

## Equality Impact Assessment Recording Form

This is a new and important process that will require different perspectives to be considered and, in some cases, difficult decisions may need to be made about policy and service delivery.

Whilst it is necessary to identify a lead officer, it is advised that they do not undertake the impact assessment on their own, but set up a group comprising a diverse range of staff responsible for delivery the service, there may also be an opportunity to include a customer, stakeholder, partner or critical friend to get a more rounded understanding of the full implications of the policy, practice, service or function.

For more information on carrying out the assessment please refer to the guidance notes or contact the Equalities and Diversity Officer or your Department's Equality Champion.

### STEP1 Equality Impact Assessment Team

Name of Policy, practice, service or function: Complaints, Compliments and Enquiries Policy & Procedure.  
Service Standards- Putting things right  
Business Plan-Mission, vision, values.

Assessment Manager Name: Heather Summers

March 2009

Directorate Responsible: Neighbourhood Services

Service Area: Community Involvement

Other members of the assessment team:

Name	Position	Area of Expertise
Su Gomer	Chief Executive	Equality/Diversity
Jason Spencer	Business Support Manager / Company Secretary	Estate and tenancy management
Christine Holmes	Tenant Board Member	user
Jim Brown	Tenant Board Member	User / older persons disability representative
Heather Summers	Community Involvement Manager	

## STEP2 Identifying the aims/objectives of the policy, practice, service or function

### Questions

1	<p>What are the main aims and objectives or purpose of the policy, practice, service or function? To set out the standards by which RH Ltd delivers its services. To develop, deliver and improve the complaints, compliments and enquiries service to tenants to learn from complaints and improve services as a direct result.</p> <p>What outcomes do you want to achieve? Agreement to levels of service set out within service standards. Service improvements as a direct result of tenant, resident and leaseholder feedback. Decrease in number of complaints received.</p>
2	<p>Are there any associated services, policies or procedures? Yes</p> <p>If 'Yes' please list below All policies and strategies as approved by Board should have a commitment to service improvement and taking account of any complaints received. Specific policies include: Complaints Policy and service standard and the Access Strategy once developed. The results from the STATUS survey also provide indication as to the services tenants feel are most important to them. This can be compared to the trends of complaints coming in on a monthly basis.</p>
3	<p>Who is affected by this policy, practice, service or function, or by the way it is carried out? i.e. Who are the internal and external customers, groups, communities or any other stakeholders? All service areas within Rykneld Homes All Tenants, Hsg Applicants, staff, LSP partners=Police, PCT, NEDDC, DCC, Mosaic presentation attached User surveys-Repairs, Aids/Adaptations Self Assessment refers to known profile and current strengths &amp; weaknesses in complaints policies and practices, -e-mail from SG dd 2<sup>nd</sup> Oct refers Current status survey asks Ts to update profile,</p>

4	<p>Who implements, carries out or delivers the policy, practice, service or function? Please state where more than one person, team, department or body? – and include any outside organisations who deliver under procurement arrangements etc.</p> <p>RH Staff within each service area as set out in the Business Plan and complaints policy/service standard itself Co-ordination by the Community Involvement Team / Service Quality Champion Federation of North East Derbyshire Tenants and Residents</p>
5	<p>Is the policy, practice, service or function affected by external drivers for change? e.g. new legislation, national policy, external inspection etc. Yes</p> <p>See Business Plan-our operating Environment para 6 Complaints best practice and government guidance together with Obudsman expectations. Tenant Services Authority (TSA) as the new regulatory body for social housing will bring ALMO's into its remit from April 2010.</p>
6	<p>What existing or previous inspections of the policy, practice, service or function are there? E.g. Best Value Inspections, policy reviews, research into the effects of a policy or practice.</p> <p>Self Assessment-Mock ALMO Inspection-attached Mock Inspection report from the Audit Commission Nov.08 Complaints review report as initiated by Community Involvement Manager</p> <p>What did they tell you?</p> <p>The service is in need of a review and updating in terms of the data collected once a complaint, compliment or enquiry is logged. The method for monitoring and reporting on performance needs to be upgraded to take away the manual recording of performance figures.</p>
7	<p>How is information about the policy, practice, service or function publicised?</p> <p>RH Ltd comms plan-under review</p>

	Involvement Monitoring group, Governance BP par 7 Web internet, Estate Inspections/Assessments, Via the Tenant Groups and Federation Homing In – Tenants Newsletter
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## STEP 3 Equality Impact Assessment

Although this form is set out under the six strands of equality we are focusing on (race, disability, gender, age, religion and belief and sexuality), consider any impacts/barriers that might cross over between race/disability, gender/religion and belief, sexuality/age etc. or all three. Use the boxes on the next couple of pages to indicate where the policy, practice, service or function could have a positive or negative impact for different groups and your reasons.

### Race

This question looks broadly at adverse impacts/barriers in terms of race, whilst the next page considers adverse impacts/barriers which may be particular to people from one ethnic group.

Question 9 considers impact/barriers for different ethnic groups within the five broad census headings.

8	<p>Identify any adverse impacts/barriers of the policy or procedure on people who may be disadvantaged because of their race</p> <p>Status survey identifies 99% white British, white 1% Irish.</p> <p>2001-census 97.95% white British.</p> <p>No identified adverse impact.</p> <p>Working with NEDDC to identify gen community groups and progress compliance to LGES level 2, Equality framework for LGvt – Approaching excellence wef April 2009.</p> <p>We have contact with translation services if necessary and offer all documentation to be translated also.</p>	
9	Broad categories used in 2001 census	Identify any adverse impact/barriers of the policy, practice, service or function on people who may be disadvantaged because of their race
	<ul style="list-style-type: none"> <li>• Asian or Asian British</li> </ul>	
	<ul style="list-style-type: none"> <li>• Black or Black British</li> </ul>	

	<ul style="list-style-type: none"> <li>• Chinese</li> </ul>	
	<ul style="list-style-type: none"> <li>• Dual Heritage</li> </ul>	
	<ul style="list-style-type: none"> <li>• White</li> </ul>	
	<ul style="list-style-type: none"> <li>• Any other people</li> </ul>	
	<ul style="list-style-type: none"> <li>• Gypsies and Travellers</li> </ul>	
	<ul style="list-style-type: none"> <li>• Asylum Seekers and Refugees</li> </ul>	
10	<p>Where do you think improvements could be made for people of different racial groups?</p> <p>Monitoring complaints by ethnicity and reporting upon this in all evaluation/performance reports so any changes in trends can be captured and actions revised accordingly.</p>	

## Gender

It is worthwhile remembering that women and men have different priorities in relation to what services they want and different needs for how these are provided. Men-only or women-only delivery for some services could be an option.

11	Identify any adverse impact/barriers of policy, practice, service or function on people who may be disadvantaged because of their gender.	
	Women	<p>Service standards=Access Customer care, Implementation of service Access principles Strategy, , Rent pyt options, , ASB, tenant Involvement, Asset Mgt strategy, Repairs, Decent Homes, Aids/Adaptations policy, <b>complaints, compliments and enquires policy –‘getting things right’ service standard.</b></p> <p>HR strategy-numbers of women employed by RH ltd.</p> <p>Status survey details note no. of single families-women/older women may be affected by caring responsibilities, isolation, can’t access the office in school hrs, school holidays.</p> <p>Women live longer-fraility, disability</p> <p>Not many women in the DLO-inbalance with the local community</p> <p>Clarify roles of male heads households-if a woman partner calls in to the area office, requests a service, is that subsequently influenced by the male partner,?</p> <p>Instances of DV are rapidly increasing in DCC-see Police partner report 22<sup>nd</sup> September</p> <p>Work commitments and care commitments</p> <p>All of the above issues could have an impact on someone’s ability to get involved.</p>
	Men	<p>Service standards: Complaints / Getting things right.</p> <p>Contact with women HH members gains info that often the household has literacy problems-there may be hidden literacy needs for men.</p> <p>Hidden Domestic violence.</p> <p>Work commitments and care commitments</p>

	Transgender	Complaints / Getting things right. RH Ltd/NEDDC holds negligible info on Transgender. E/D training for Board , SMT, Service managers June 08, staff 07/08, raise possible roles experienced, role plays-ebnsourages staff to be on the lookout for Transgender hidden needs.
12	Where do you think improvements could be made for people experiencing disadvantage because of their gender? The complaints monitoring needs to be developed to ensure complaints by gender can be reported upon so trends can be identified and relevant action taken accordingly.	

## Disability

All service providers have a duty to make reasonable adjustments for people with disabilities, including physical features of premises, so it is advisable to anticipate any adjustments that may be required. Consider the barriers faced by different groups of people with disabilities as listed in the boxes below. Note also that changes to legislation mean that conditions such as MS, HIV and cancer are now included under the DDA from the time of diagnosis.

13	Identify any adverse impact/barriers of policy, practice, service or function on people who may be disadvantaged because of their disability.	
	People with physical or mobility impairments	Access, to ensure all events hosted or organised by Rykneld Homes and associated groups ensure fully DDA compliant venues. People with a mobility disability make up 17.6% of our tenants with another 51.2% unknown. From a recent survey of tenant groups those attending these meetings report they have quite a large attendance from people with mobility disabilities. Services need to be designed to accommodated people with mobility disabilities to ensure complaints are reduced.
	People with sensory impairments (hearing, visual and speech)	Access , Customer care, Tenant involvement—Tenants can't hear/can;t hear clearly, hear what you are saying-telephone contact needs to be supplemented , update Tenant profile ref preferred methods contact. Written information inability to read of the complaints procedure or policy, publicity needs to take more forms than just written.

		Sign language users-DLO,
	People who use mental health services	We do not know /share enough detail ref this user group. We too often list complainers as Persistent complainants, generally cross, without considering whether there is a need for mental health support or whether this is already being given. Link age to dementia possibilities.  Check supporting people plans and profile information
	People with learning disabilities	Local knowledge from Area Office staff, DLO, identifies where Tenants have literacy problems-use of face to face contact is maintained. Options are available for people to get involved who have learning difficulties flexibility of method is always adhered to. We know that 1.8% of tenants consider themselves to have a learning disability another 51% is not known. We therefore have to cater for the possibility of people getting involved who have learning needs. We have contact with community groups and organisations who can provide help and support in this remit.
	People who have a non-visible condition such as epilepsy or diabetes	As above
14	<p>Where do you think improvements could be made for people experiencing disadvantage because of their disability?</p> <p>This is a key area for RH Ltd and NEDDC due to the Resident and Tenant profile., and the MOSAIC resident profile-which will facilitate delivery of Equality framework for LGvt wef April 09.</p> <p>Make sure that the implementation of Service Access principles, does not loose the local Knowledge gained by Area office staff.</p> <p>Ensure monitoring of complaints takes into account disability so trends can be identified and action taken as a direct result.</p>	

## Age

When answers the following questions consider the needs of the wider age range of District

15	Identify any adverse impact/barriers of policy, practice, service or function on people who may be disadvantaged because of their age.	
	0-9	Caring responsibilities may disadvantage Tenant Households from accessing services, resulting in isolation-link to Sure start opportunities
	10-15	These are the tenants of tomorrow-Involve young persons eg Youth parliaments, do not disadvantage young people from indiscriminate application of the ASB strategy.
	16-19	School leavers, high level of teenage pregnancies-partner reports 22 <sup>nd</sup> September 2008-support for new Tenants.
	20-29	Tranches of DV –apply ASB strategy, high levels of HB dependency-Rents service standards, time availability of busy lifestyles, work and family. Complaint policy takes account of this and is flexible to accommodate their needs.
	30-44	Tranches of DV-apply ASB strategy, as above. Time availability of busy lifestyles, work and family.
	45-59	Employment discrimination-Rents/leasehold service standards, Strategies/Policies, Corporate debt recovery policy
	60-64	As above-Age/disability adverse impact, sheltered hsg, supporting people QAF assessments. Transport and mobility issues.
	65-74	As above
	75-over	As above
16	Where do you think improvements could be made for people experiencing disadvantage because of their age?	

	No specific actions to note.
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## Religion and Belief

17	Identify any adverse impact/barriers of policy, practice, service or function on people who may be disadvantaged because of their religion or belief.	
	Christian	35.44% as of 10 <sup>th</sup> March 09 This accounts for the majority of our tenant base.
	Buddhist	0.08%
	Hindu	0.01%
	Jewish	0.02%
	Muslim	0.07%
	Sikh	0.01%
	Other	1.37%
	No religion or belief	6.55%
18	<p>Where do you think improvements could be made for people experiencing disadvantage because of their religion or religion?</p> <p>We/NEDDC do not know enough about religious impact. We do know of the support to reduce isolation offered by local churches-the proposed pilot to work with the Churches to reduce worklessness, isolation will explore this further.</p> <p>We also need to ensure services are monitored by religion, complaints may come in due to our service not taking into account their religious practices. This is to be monitored from April 09.</p>	

## Sexuality

19	Identify any adverse impact/barriers of policy, practice, service or function on people who may be disadvantaged because of their sexuality.	
	Lesbian, gay or bisexual people	See 11 above. We are encouraging Tenants/staff to identify their profile, so that we can meet unmet needs. It is known that a lot of tenants prefer not to say or leave this question blank when completing the tenant profile. We know that 0.34% state they are bisexual, 0.09% gay male/female, 12.16% heterosexual, 1.81% prefer not to say and 84.92% is not known.
20	Where do you think improvements could be made for people experiencing disadvantage because of their sexuality? See 11 above See actions 18 and 14 – similar actions to take account of sexuality too.	

## Other Categories

21	<p>Rural/Urban</p> <p>This is a real issue for RH Ltd-and must be addressed in the implementation of the service access Principles strategy. Work with NEDDC/Derby CC mobile bus for rural areas welcomed by users. Complaints will vary due to the location of the tenant and their neighbourhood. Future work will look at area specific arrangements to ensure services meet the needs of our tenants taking into account where they live.</p>
22	<p>Any other</p> <p>Consider the needs of the Tenant profile who may be affected by the decline in the mining industry, effects of working in coal mines eg disabilities, Tenants paid their work pensions in coal-do not insist on the removal of coal fired heating – responding to local requirements and ensuring involvement has a direct influence over the actions RH takes.</p> <p>Hsg Health impact assessment =-linking hsg, to Health to Crime and testing impacts eg improved Capital programme reduction in respiratory disease is being progressed with the LSP. Ensuring that tenants are involved in their communities to improve their facilities and knowledge on the links between health, housing and community cohesion.</p>

## Customer Access

23	<p>How do customers currently access the service i.e. what are the access channels e.g. web, telephone, letter etc.</p> <p>Web – email Letter Telephone Open Days Tenant meetings</p> <p>What improvements can be made? See service access principles implementation and development of the Access strategy. Improvements could be made to the access via the website to all services - develop involvement opportunities over the web.</p>
	<p>Are there any physical barriers to accessing the service? No</p> <p>How are they overcome? As above</p>
	<p>What customer involvement in setting the customer service standards i.e. opening hours, response times, availability etc.</p> <p>HQN project, Involvement management group, Tenant drop ins, Editorial panel, Federation involvement in open days-include Fed under Complaints service standards as an access for Independent complaints review, Make standards simple as up front promises, the who what when message, then set out detail The IMG is set up to monitor all service standards and RH performance against them. This will include performance against complaints.</p>

## STEP 4 Collecting the information and data about how the policy, practice, service or function impact on communities

Please record your information and data below with reference to:

- Deciding what information or data you will need or desire
- Using both quantitative and qualitative data
- Ensuring that where possible there is information that allows all perspectives to be considered
- Identified any gaps in the information/data and what it can tell you

<b>Data or information</b>	<b>When and how collected</b>	<b>Source</b>	<b>What it tells you – please consider all 6 equality strands where possible</b>	<b>Gaps in information</b>
Customer feedback and complaints	Performance and quality team		As above when considering strands	Robust complaints analysis required-being addressed as part of Complaints review
Consultation and community involvement	Involvement agreement, strategy and policy. Involvement timetable.		As above	Satisfaction questionnaire details need to be joined up and co-ordinated throughout RH. Timetable will develop further during 2009/10 to accommodate this.
Performance information including Best Value	See above Audit commission Inspections		As above	Gaps in all equality strands relating to the Tenant profile.
Take up and usage data	variable		As above	To be channeled and systematically analysed through the performance and quality team

<b>Data or information</b>	<b>When and how collected</b>	<b>Source</b>	<b>What it tells you – please consider all 6 equality strands where possible</b>	<b>Gaps in information</b>
Comparative information or data where no local information	MOSAIC Resident profile			
Census, national or regional statistics	Census 2001			
Access audits or assessments e.g. DDA assessments	DDA office assessments			
Workforce profile	Inadequate for purposes of detecting adverts impact			To be developed
Where service delivered under procurement arrangements – workforce profile for deliverers	Set out in Procurement strategy			
Monitoring and scrutiny outcomes	Board Governance, -see BP para 9			LGES level 2 being identified

## STEP 5 Monitoring

For this step it is important to refer to any monitoring information which is already held. As stated in the guidance notes arrangements need to be set up for effective monitoring if this is not already taking place.

	<p>How do we know whether our service is accessible to all groups?</p> <p>Arrangements being made to collect Profile data for both staff and Tenants, analyse service data held and systematically relate back to the delivery of policies and service standards.</p> <p>Review of Complaints process, development of Performance and quality services,</p> <p>Review of service specific surveys</p> <p>Involvement Impact assessment due to be carried out in March 09</p> <p>Performance indicator information</p>
	<p>If there is a lack of information, what research will be carried out, and for which groups?</p> <p>As above</p>
	<p>If this is a new policy, or one not currently monitored, what are the arrangements to begin monitoring the actual impacts of the policy?</p> <p>Complaints will be monitored via ANITE and through the Balanced Scorecard. Quarterly Comprehensive performance reports. This will be monitored also by Sub-Board and Board.</p>

## STEP 6 Consultation

	<p>What have service users/non-users or other stakeholders (including employees) already told you about the policy and negative impacts?</p> <p>Complaints are traditionally an area where tenant satisfaction can be quite low, how we deal with complaints is highly important to ensure the complainant understands the reasoning behind any decision made.</p> <p>Who has been consulted and what methods were used?</p> <p>Business Plan consultation-report to board April 08 refers,          Business plan consultation BP 2009/10 –report t Board Oct 08 refers,          Service Standards focus group considered the complaints process in detail.</p>
	<p>If you need to carry out further consultation, who will you be consulting with and by what methods?</p> <p>Complaints service satisfaction survey.</p>

## STEP 7 Equality Action Plan

Problem/barrier identified

Actions to overcome problem/barrier

Resources required Responsibility Target date –

**see SIPS –Business Plan 2009/10**

**See Community Involvement Service Action Plan**