

# Equality Impact Assessment

Title:	<b>Unreasonable persistent complainants and unreasonable complainant behaviour policy</b>	
Version:	<b>1.0</b>	
Date of draft:	<b>4.8.16</b>	
Date approved by Equalities Group	<b>15.9.16</b>	

## Section 1A: Overview

<b>Name of Policy, Procedure, Practice, Strategy or Service:</b>	<b>Unreasonable persistent complainants and unreasonable complainant behaviour policy</b>
<b>Service, Group, Team:</b>	Performance and Community
<b>Equality Assessment Lead Officer:</b>	Rachel Fernandez (Performance and Community Manager)
<b>Head of Service</b>	Lorraine Poyser (Director of Community Services)

**1B: Please state the intended outcomes of the policy**

**How will you know these have been achieved?** *What performance monitoring is in place?*

To identify and manage complaints of a vexatious nature and to limit the contact of the complainant where this action is deemed to be necessary.

The policy will ensure that staff understand the process of action that is available, enable them to identify potential issues where action is required.

A record of any action will be kept to identify the process which led to a customer or their behaviour being deemed to be unreasonable. The record will record how the customer will be corresponded to in the future.

**Section 2A: The policy. How will the policy/plan/strategy impact on residents, visitors, businesses or other agencies that we work with?** *What work has been undertaken to advise these groups about the changes planned in the policy/plan/strategy?*

The council welcomes feedback from residents, businesses and visitors to the borough and recognises that sometimes customers make comments and complaints and that this is a way to identify improvements in the way we provide activities, information and services. Where the frequency or nature of the customer's contact with the council impacts on our resources, in that we are hindered in our delivery of services to others the council must take action to reduce this impact.

**2B: What needs is the policy/service designed to meet?** *You could also refer to your current Service Plans and how the policy/service fits into EBC's Corporate Plan Priorities. How does the policy, procedure, practice, strategy or service align with Corporate Priorities*

This policy will meet the Corporate Priorities 2016-19:

- Improved access to services,
- Delivering efficient and effective services that residents need,
- A well run efficient council.

Where a customer is identified as being persistent in making complaints or their behaviour judged to be unreasonable a designated officer can be authorised to be a single point of contact with that customer to provide consistency for that customer and ensure the effective use of resources for all other customers.

**2C: Is the service provided subject to any element of outsourcing?** *Is the service delivered in part, or in its entirety by an outside company or organisation? If challenged about a service delivered on our behalf you must show that the organisation meets the expectations with regard to equalities in its customer service and recruitment and retention of staff.*

No

## **Section 3A: Gathering Information**

**What equality monitoring information do you gather and how is this information used to develop services, functions and policies at the current time.** *You could look at the take up of services, customer satisfaction (complaints and compliments) and enforcement action.*

When a customer uses the CCC system they are invited to complete an equality monitoring survey. Comparatively few register this information to make its use meaningful. Any CCCs that identify access or issues affecting equality and diversity are reported to the Corporate Equality Group for discussion, to identify possible solutions that can be implemented to prevent such issues re-occurring.

**3B: What does available data and the results of any consultations show about the take up of services? What is the impact on different groups? (qualitative and quantitative).** *You could look at previous community consultation exercises, customer reviews, census data, staff feedback etc.*

**Remember:** by law you are required to be able to demonstrate, through data analysis and evidence, that you have considered the impact of your service on **ALL** of the relevant protected groups. This document is just a short summary of this process and a tool to help you to check that you have taken the Equality Act 2010 and the Council's equality objectives into consideration.

Records have not identified any issues where the persistent or unreasonable behaviour of customers has required the need to invoke the policy in the last 12 month period.

**Section 4: Impact Assessment** *Here you need to analyse the needs of different groups and the possible impacts the service may have on them. How is the policy or decision likely to affect the **promotion of equality** and the **elimination of discrimination** in **each** of the groups?*

Stake Holder Group	Is this group likely to be affected in a positive way?	In what way will they be affected?	Is this group likely to be affected in a negative way?	In what way will they be affected?
Age (older people, young people)	<b>Yes</b>	The policy would ensure the customer would have a single point of contact should there be a need for action.	<b>Yes</b>	There is a need to ensure that the single point of contact has dementia awareness training, where a resident has been identified as having dementia.
People with Disabilities (Both physical and mental impairments)	<b>Yes</b>	The policy would ensure that any vulnerable customers would have a single point of contact should there be need for action.	<b>Yes</b>	There is a need to ensure that the single point of contact has access to services that allow the customer to have full access to information and support, e.g. BSL
Gender (Women, Men,	<b>No</b>	There would be a neutral impact on this group.	<b>No</b>	

Transgender, Transsexuals)				
Race (Black, Asian, Minority Ethnic groups. Include people whose first language is not English)	<b>Yes</b>	The policy would ensure that there would be a single point of contact should there be need for action.	<b>Yes</b>	There is a need to ensure that the single point of contact has access to the facility to a translation service, or a Community Language Speaker where the complainant's first language is not English
Sexual Orientation	<b>No</b>	There would be a neutral impact on this group.	<b>No</b>	
Religion and belief	<b>No</b>	There would be a neutral impact on this group.	<b>No</b>	
Dignity, Human Rights and Socio-economic disadvantage	<b>No</b>	There would be a neutral impact on this group.	<b>No</b>	
Marriage and Civil partnerships	<b>No</b>	There would be a neutral impact on this group.	<b>No</b>	
Pregnancy and maternity/paternity	<b>No</b>	There would be a neutral impact on this group.	<b>No</b>	

<b>Section 5A: Actions</b> <b>How will you monitor the ongoing effect of the policy/strategy/plan?</b>	<b>When will this be undertaken?</b>	<b>Expected outcomes / performance measures</b>	<b>Which Corporate Plan aim will this action meet?</b>
The Customer Care Officer (CCO) will monitor the CCC system to identify any recurring complainants.	The CCC system is monitored on a daily basis and quarterly analysis of CCCs recorded is provided.  The CCO reports any CCCs that raise an issue of Equality and Diversity at the bi-monthly meetings of the Corporate Equality		Delivering efficient and effective services that residents need.  Improved access to

	Group (CEG)		services.
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**5B: If you have identified any negative impacts on any of the groups in section 4 how will you mitigate the effect?**

<b>Negative impact</b>	<b>Action required to mitigate any potential negative impact</b>	<b>Outcome / performance measure</b>	<b>Lead Officer – who will the monitoring of this action be reported to?</b>	<b>Date that the monitoring will be undertaken, how often will it be done?</b>	<b>Which of the current Equality Objectives does this action meet? (State number *)</b>
There is a need to ensure that the single point of contact has dementia awareness training, where a resident has been identified as having dementia.	The council has approved a request to join the Erewash Dementia Action Alliance, after this the council will look at dementia awareness sessions for staff.	All front line staff will have been invited to attend a dementia awareness session	S Gorman (CCO)	The first dementia awareness session will be delivered before 31.12.16	Objective 2
There is a need to ensure that the single point of contact has access to services that allow the customer to have full access to information and support, e.g. BSL	The council is reviewing access to information and services as part of its Equality Objective Action Plan.	Action completed and reported to the CEG	S Gorman (CCO)	31.12.16 – action date for this equality objective.	Objective 2
There is a need to ensure that the single point of contact has access to the facility to a	The council is reviewing access to information and services as part of	Action completed and reported	S Gorman (CCO)	31.12.16 – action date for this equality objective.	Objective 2

translation service, or a Community Language Speaker where the complainant's first language is not English	its Equality Objective Action Plan.	to the CEG			
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\*The objectives are:

1. **Provide a welcoming and safe place for our communities, visitors and businesses which embraces equality and is free from discrimination.**
2. **Provide relevant services that are free from discrimination and delivered in a way that is responsive and accessible.**
3. **Understand and value the diversity of our communities through community engagement**
4. **Foster an accessible and inclusive working environment for all our staff and strive to achieve a workforce that is representative and diverse.**