

July 2015

**KENT COUNTY COUNCIL
EQUALITY ANALYSIS / IMPACT ASSESSMENT (EqIA)**

**This document is available in other formats, Please contact
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telephone on 03000 417025**

You need to start your Equality Analysis and data collection when you start to create or change any policy, procedure project or service

When developing high-level strategies under which other policies will sit, if those policies are jointly owned by KCC and partner organisations, they will need to take the partnership approach to EqIAs,

Directorate: Strategic and Corporate Services

Name of policy, procedure, project or service – Customer Feedback Policy

What is being assessed? Policy

Responsible Owner/ Senior Officer

- Amanda Beer

Date of Initial Screening – 23rd May 2016

Date of Full EqIA :

Update each revised version below and in the saved document name.

Version	Author	Date	Comment
			This is an update on the previous Customer Feedback Policy
V.0.1	Pascale Blackburn-Clarke (PBC)	23/05/16	Initial Screening
V0.2	Akua Agyepong	13/06/2016	Comments for review
V0.3	PBC	23/06/2016	Additional amendments
V.0.4	PBC	25/07/2016	Additional amendments following feedback from Akua Agyepong

Updated 26/10/2015

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Updated 26/10/2015

Screening Grid

Characteristic	Could this policy, procedure, project or service, or any proposed changes to it, affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative	Internal action must be included in Action Plan	If yes you must provide detail
Age	No		None	<p>A range of communication channels are available which should ensure access across a broad range of ages. This includes;</p> <ul style="list-style-type: none"> • Phone • Online • Post • Face to face • Email • Comment cards • Text Messaging (Children Social Care) • Fax • Through an advocate such as a relative, friend, carer, MP, Member or charitable organisation <p>The policy has also been amended to reflect that we will also accept feedback left on our social media pages such as KCC's Facebook pages and Twitter feeds.</p>	<p>The Customer Feedback process is available to all customers and their representatives. It is designed to be open and impartial and the process does not discriminate in terms of age.</p> <p>We recognise that some customers may find it harder to make a complaint for example young people who may wish to text Children Social Services or use an advocacy. KCC offers a variety of ways to give feedback to ensure that customers can approach us in the way in which they are able or want to.</p>

Disability	No		None	<p>A range of communication channels are available which should ensure access across a broad range of ages. This includes;</p> <ul style="list-style-type: none"> • Phone • Online • Post • Face to face • Email • Comment cards • Text Messaging (Children Social Care) • Fax • Through an advocate such as a relative, friend, carer, MP, Member or charitable organisation <p>The policy has also been amended to reflect that we will also accept feedback left on our social media pages such as KCC's Facebook pages and Twitter feeds.</p>	<p>The policy will be universally applied and is not expected to have any impact on those customers with disabilities. The Policy takes into account those statutory obligations the Council has for Adult and Children Social Services and Special Educational Needs. The acceptance of feedback through a variety of methods also means that customers can give us feedback through the communication medium they are most comfortable with. For example customers can call KCC using Textrelay which enables customer who are deaf or hard of hearing to talk to officers in the Council.</p> <p>The online form is accessible to those who use screen readers and other access technology. The online form meets section 508/WAA standards. The procurement of a new system has included accessibility standards to ensure both staff and customers with disabilities can access the form.</p> <p>Customers can request alternative formats (for example Braille).</p> <p>We recognise that some customers may find it harder to make a complaint for example those customers who have learning difficulties. KCC offers a variety of ways to give feedback to ensure that customers can approach us in the way in which they are</p>
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Gender	No		None		The Customer Feedback process is available to all customers and their representatives. It is designed to be open and impartial and the process does not discriminate in terms of gender.
Gender identity	No		None	Risk that customers may target staff on Social Media. Guidance on what to do if comments of this nature are made against a staff member will be added to internal guidance	<p>The Customer Feedback process is available to all customers and their representatives. It is designed to be open and impartial and the process does not discriminate in terms of gender identity.</p> <p>Customers are able to give feedback anonymously; the Council will consider and investigate all complaints it receives regardless of whether the complainant makes themselves known.</p>

Race	No		None	Contract for language line is in place within the Contact Centre enabling customers whose first language is not English to be able to speak to an agent via an interpreter.	<p>The Customer Feedback process is available to all service users and their representatives. It is designed to be open and impartial and the process does not discriminate in terms of a person's race.</p> <p>We have our own language translation and interpreting service called Connect 2 Staff.</p> <p>The contact centre has use of translation services for those customers whose first language is not English. Other communication methods are used by local teams but this may need to be addressed corporately.</p>
Religion or belief	No		None		The Customer Feedback process is available to all customers and their representatives. It is designed to be open and impartial and the process does not discriminate in terms of religion or belief.

Sexual orientation	No		None	Risk that customers may target staff on Social Media. Guidance on what to do if comments of this nature are made against a staff member will be added to internal guidance	The Customer Feedback process is available to all customers and their representatives. It is designed to be open and impartial and the process does not discriminate in terms of sexual orientation. Customers are also able to give feedback anonymously; the Council will consider and investigate all complaints it receives regardless of whether the complainant makes themselves known.
Pregnancy and maternity	No		None		As this is an employment related characteristic any complaints relating to employment within the Council will be referred to KCC's internal grievance processes.
Marriage and Civil Partnerships	No		None		As this is an employment related characteristic any complaints relating to employment within the Council will be referred to KCC's internal grievance processes.
Carer's responsibilities	No		None		The policy allows carers to raise feedback on behalf of someone who they provide care for and for themselves as a carer.

Part 1: INITIAL SCREENING

Proportionality - Based on the answers in the above screening grid what RISK weighting would you ascribe to this function – see Risk Matrix

Low	Medium	High
Low relevance or Insufficient information/evidence to make a judgment.	Medium relevance or Insufficient information/evidence to make a Judgment.	High relevance to equality, /likely to have adverse impact on protected groups

State rating & reasons

Low – This policy is an update of an existing policy to include new methods of communication and to establish a clear route for School Governors to make complaints. It is judged that there will be minimal adverse impact to customers following the implementation of the updated Policy as customers will experience no change in the timelines or response rate to their complaint.

The policy does not seek to reduce the ways in which customers can offer feedback, it will put in place mechanisms to ensure that these are actually increased and will increase access, for example formalising that complaints can be received via Social Media platforms.

Context – What we do now and what we are planning to do

The Customer Feedback Policy is an updated version of the Council’s Complaints, Comments and Compliment Policy. This new version intends to take into account feedback that is left by customers on our social media pages such as KCC’s Twitter feeds and Facebook pages. The addition of social media to the policy is to highlight to staff that customers who directly contact or leave feedback via this medium should be responded to in line with KCC’s procedures. The policy will also implement learning from a complaint received in relation to School Governors and their rights in raising complaints about the Council to the Council.

Currently the policy sets out the expected timeframes in which customers should receive a response; this will not change in the updated version of the policy. These timescales are similar to other authorities.

Aims and Objectives

The council is committed to enabling our customers to give us feedback about where we have got things wrong and also where we have got them right. By making it easier for our customers to offer feedback we are able to learn from that feedback to improve our services for the better.

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The purpose of this policy is to:

- clarify how the public may make a complaint about us
- define the standards the public can expect when they make a complaint
- recognise the importance of customer feedback in providing feedback about council services and performance
- set out how the Council will monitor customer feedback and use that information to improve services and identify training needs

The updated policy also seeks to provide a clear process for those School Governors who have a complaint against the Council but previously had no clear escalation process.

Beneficiaries

Customers should be clearer about their rights and how the Council will consider their feedback as the policy will be made available to customers.

The policy is clear about how complaints will be considered and how customers should be updated during the course of KCC's investigations.

Staff will also have a clearer understanding of KCC's definitions of customer feedback received and the expectations on them as staff in responding to customer feedback.

Information and Data used to carry out your assessment

The following table gives an overview of the feedback received by KCC as a whole compared with the previous year.

Year	Complaints	Comments	Compliments	Local Government Ombudsman complaints
2014/2015	2,944	1,561	2,358	205
2015/2016	3,070	1,490	2,079	185

The breakdown below indicates by percentage which channel customers have chosen to communicate feedback (Compliments, comments & complaints) during 2015/16.

	Phone	Letter	Email	Comment/ Face to Face	Online	Other

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Complaint	35%	15%	38%	3%	9%	Negligible
Compliment	12%	18%	50%	2%	5%	3%
Comment	10%	20%	54%	13%	2%	2%

The above table shows that email is currently the preferred method of communication for our customers wishing to give us feedback across the board, however when making a complaint customers also show preference for telephone. This may be due the immediacy of being able to speak to someone directly and receive reassurance it will be looked into.

Although individual equalities data is not collected from customer, staff are expected to report on complaints in which customers have raised an equalities issue. In 2015/16 of the 3,070 complaints received 18 complaints specifically raised an equalities issue.

The following table gives an overview of the type of complaints received

Protected Characteristic	Complaint
Age/Disability	Relating to vulnerable children travelling to school
Age	Falls as a result of broken pavements
Gender	Inappropriate behaviour
Disability	Dropped curbs
Age/Disability	Night lighting policy
Disability	Clearing of vegetation from a tree owned by Council
Disability	Removal of bollards that are needed by a disabled resident
Disability/Age	Lack of phone number for the Floating Support service
Race	Racial discrimination
Race	Allegation that staff refused to interact with a customer due to their ethnic background.
Disability	Right of access for disabled customer

In light of the gaps highlighted in an early version of this EQiA, we have amended the reporting to ask services what was the outcome of those complaints which have raised an equalities issue, to help us understand how the feedback received has informed service changes.

We are currently working on implementing a county wide feedback system which will make it easier to identify these types of complaints and ensure that any lessons learned are applied to all services where possible.

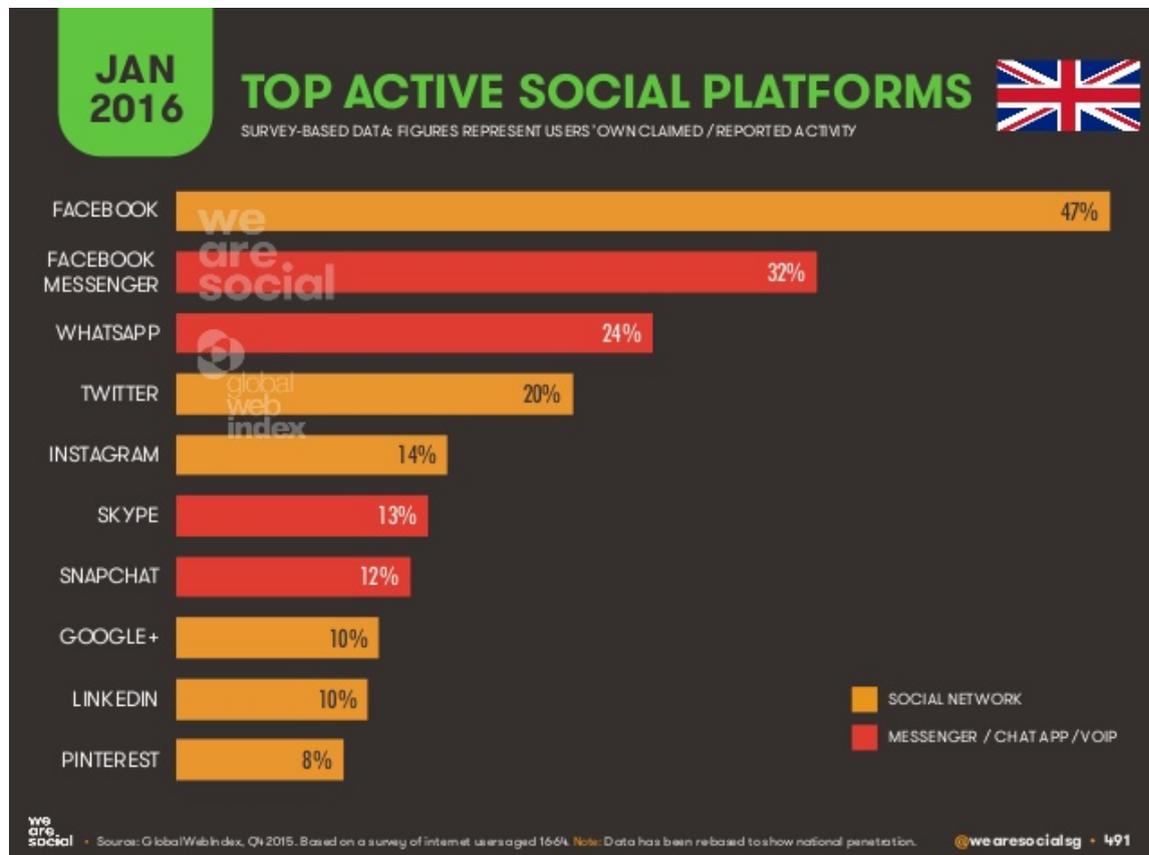
Every effort is made to ensure that a variety of feedback methods are available to our customers ensuring that they have choice and are able to use a communication method which suits their needs. This includes giving feedback directly through our staff, via our Members, by post, by phone, by text relay, by text, comment cards and via the internet either through an online form or by Social Media.

Customers are not expected to formalise their complaints in writing.

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To date we have not formalised that feedback given via social media, customers are already choosing to communicate with us using this channel through our corporate and service pages and feeds.

The following¹ demonstrates the type of social media platforms that are most used by residents in the UK. KCC has corporate pages on Facebook and Twitter. Other services use social media that is appropriate for their customer's demographics.



Mosaic data shows that 59.5% of the KCC population are likely to access Facebook every or most days compared to 61% of England's population, whilst 55.3% of KCC's population are likely to access Twitter every or most days compared to 59.8% of England's population.

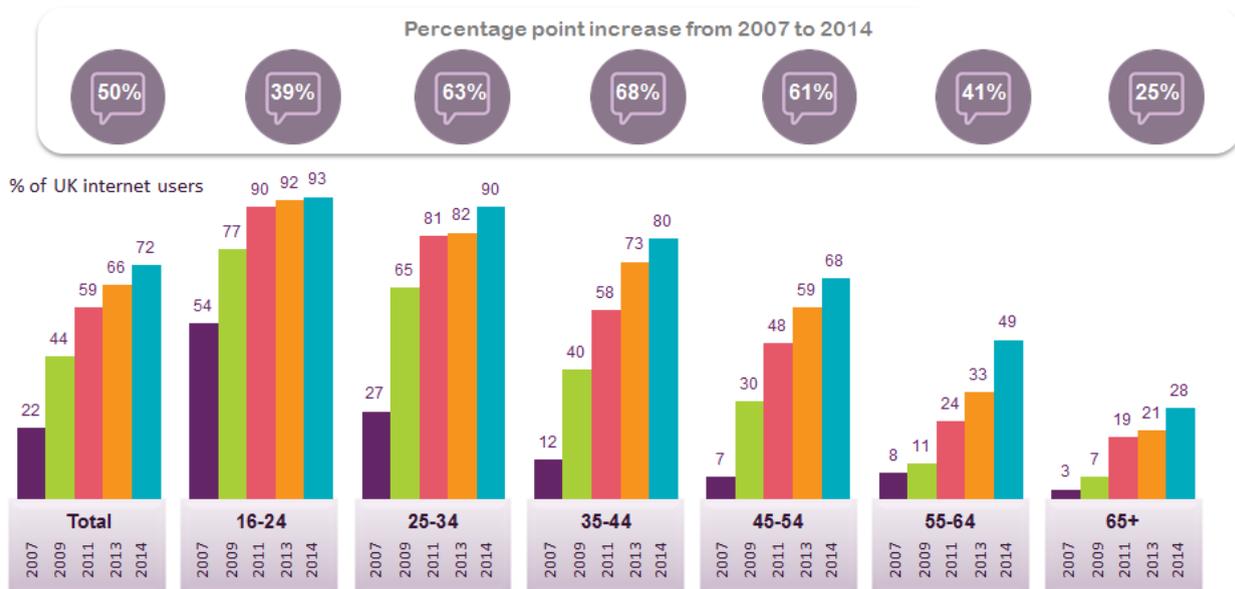
The below breaks down social media users who have an online profile, by age for the United Kingdom. Social Media is used by 59% of the UK population and is a significant channel used by those in the 16-44 year old brackets.

There has been uptake of internet users who have a social media profile between 2007–2014².

Those who were 65+ and had a social media profile increased to 28% of their demographic who had access to the internet.

¹ Source Globalwebindex, Q4 2015 <http://www.smartinsights.com/social-media-marketing/social-media-strategy/new-global-social-media-research/>

² http://stakeholders.ofcom.org.uk/binaries/research/media-literacy/media-lit-10years/2015_Adults_media_use_and_attitudes_report.pdf



The Legal department worked alongside a School Governor following their complaint to KCC. The complaint revealed that there was a gap in process for those who needed to escalate their complaint but were unable to. Their views were captured when formulating a process on how complaints from School Governors could be considered and escalated.

The following guidance was used to inform the updated policy;

- Local Government Ombudsman Guidance – Guidance on running a complaints system and Guidance on Managing Unreasonable complaint behaviour
- Information Commissioner Guidance – Dealing with Vexatious Complaints
- Department of Education - Schools Complaints Toolkit 2016

Who have you involved and engaged with

Customer Feedback Forum (Internal KCC) which includes complaints officers from across the different services were asked for their input and feedback on the revised policy and internal guidance.

Governance and Audit Committee will also be given an opportunity to feedback on the updated policy before it goes to Policy and Resources Committee for final scrutiny.

Due to the minimal changes to the policy the decision was made not to consult with customers formally.

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Potential Impact

The policy and its implementation should not have an adverse impact on KCC customers or residents. However it is recognised that there are some customers who may find it harder to make a complaint for example those customers who have learning difficulties or younger people who may wish to appoint an advocate to speak on their behalf.

To mitigate any risks that customers may not be confident or able to approach us directly we have enabled others to raise feedback on their behalf. Customers are also able to give feedback anonymously; the Council will consider and investigate all complaints it receives regardless of whether the complainant makes themselves known.

In addition we do not ask customers to put their complaints in writing, we will accept complaints verbally either face to face or by phone.

KCC will continue to offer a variety of ways to give feedback to ensure that customers can approach us in the way in which they are able or want to. This includes giving feedback directly through our staff, via our Members, by post, by phone, by text relay, by text, comment cards and via the internet either through an online form or by Social Media.

Adverse Impact and how can these adverse impacts be mitigated, (capture this in the action plan)

As above, there are risks that some customers with protected characteristics who may be reluctant to give feedback to the council. The council has tried to mitigate this by offering multiple channels for customers to give their feedback through, as well as enabling them to give feedback anonymously and through an advocate.

Positive Impact

This new version intends to take into account new methods of communications for example accepting feedback left via our Social Media pages/feeds and to implement learning from a complaint received in relation to School Governors and their rights in raising complaints about the Council to the Council. This will formalise avenues for customers who leave us feedback via Social Media.

The positive impact is increasing the avenues available for our customers by formalising these routes through our policy.

Set out below the implications you have found from your assessment for the relevant diversity groups. If any negative impacts can be justified please clearly explain why.

Option 1 – Screening Sufficient YES/NO

Following this initial screening our judgement is that no further action is required.

Justification:

Option 2 – Internal Action Required YES/

There is potential for adverse impact on particular groups and we have found scope to improve the proposal

(Complete the Action Plan at the end of this document)

This is an amendment to an existing policy. This Policy will be published and made available to our customers and staff. The policy intends to enable all customers regardless of protected characteristics to have the ability and the right to raise complaints/compliments/comments by any method they need or want to.

However it is recognised there is further work that could be undertaken, for example greater analysis of those complaints received which raise an equalities issue and whether there is scope for learning from them across all services.

Option 3 – Full Impact Assessment YES/NO

Monitoring and Review

Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

Senior Officer

Signed:

Name:

Job Title:

Date:

July 2015
DMT Member

Signed:

Name

July 2015

Job Title:

Date:

Please forward a final signed electronic copy to the Equality Team by emailing

diversityinfo@kent.gov.uk

The original signed hard copy and electronic copy should be kept with your team for audit purposes.

Equality Impact Assessment Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
Gender Identity, Sexual orientation	Risk that staff members will be targeted on social media	Guidance for staff will cover what to do in this eventuality.	Clear guidelines on what to do if a member of staff is targeted online	Pascale Blackburn-Clarke	Alongside launch of Policy	None
All	No corporate overview in real time of complaints that raise equalities issues	Include capture of complaints raising equalities issues in new system	Equalities issues raised in complaints are flagged early and lessons learned will be applied across the organisation if appropriate	Pascale Blackburn-Clarke	April 2017 (launch of new system)	None included as part of the specification for the system
All	Gap in knowledge across the Council as to what has been done as a result of a customer raising an equalities issue.	Include new reporting line to capture what is done as a result of customer raising equalities issue	Overview of what has been done as a result of feedback received relating to equalities issues	Pascale Blackburn-Clarke	For Quarter One reporting 2016 (July)	None
Disability/Race	Potential language barrier for customers	Ensure all content for customers is written in plain English and is accessible if online.	Clarity for customers in how to complain to the council	Pascale Blackburn-Clarke Service owners	Ongoing September 2016	None

Disability	Customers with Learning difficulties may find our process complicated to understand. Although an easy read version of the Social Care procedure is available, there is not one available for customers who may wish to complain about other KCC services	Explore production of easy read version of the Complaints KCC procedure	Clarity for customers in how to complain to the council about non-social care issues	Pascale Blackburn-Clarke	April 2017	Printing materials
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