

Equality impact assessment

Name of proposed policy, practice, project or service: Complaints policy	New [] Existing [X]
Assessment conducted by: Claire Naylor	Date of Assessment: 25/01/2024
Department and directorate: Operations	
<p>1. Aims of the proposal.</p> <p><i>What are the aims of the proposal and the intended outcome(s)? What is the scale of the proposal?</i></p> <p>Our complaints policy is being updated to align with the requirements outlined within the Housing Ombudsman’s Complaint Handling Code. An equality impact assessment (EIA) will ensure that we are able to identify and reduce any adverse impact on our customers and we have assessed the impact of decisions on individuals with protected characteristics.</p> <p>Changes being made to the policy will be beneficial for our customers in making it easier for customers to complain through different channels. We must consider our duties and anticipate the needs and reasonable adjustments of individuals who may need to access the complaints process.</p> <p>The Housing Ombudsman Service has undertaken its own equality impact assessment.</p>	
<p>2. Evidence considered.</p> <p><i>What data or other information have you used to evaluate if this proposal is likely to have a positive or an adverse impact upon protected groups when implemented? Where there were information gaps, what steps can you take to remedy these gaps?</i></p> <p>Age – We have adequate provisions in place for customers to contact us to make a complaint, over the phone, via email/letter and in person – regardless of their age. I have reviewed the equalities data relating to age and it is evident from CX records that even our oldest resident is able to effectively communicate with us.</p> <p>Disability – According to the Housing Ombudsman, 54% of resident households have recorded a disability as part of the English Housing Survey (EHS). In the Office for National Statistics (ONS) housing and disability data, 76% of social renters are recorded as having a disability within their household. Those with a disability are accessing/using the service less when we compare this with the ONS data, but it is comparable if we use the EHS data on disability.</p> <p>In Section 3 of the Complaint Handling Code, it specifies that landlords must consider their duties under the Equality Act 2010 and anticipate the needs and reasonable adjustments of individuals who may need to access the complaints process.</p> <p>Complainants can physically access our office at the rear of the building which is accessible to wheelchair users and those less able to use stairs. Our data shows that our customers have a range</p>	

of disabilities from mental health and learning difficulties to mobility and visual disabilities. Our communications can be customised for disabled customers – we can use audio or large print letters etc. We will accept a complaint in any format and will work with customers to understand their communication needs and preferences.

Gender reassignment – The complaints policy does not favour any gender and offers equal opportunities for all.

Marriage and civil partnership – Office for National Statistics data: Although the percentage of households without an internet connection has generally been declining, those who live alone are less likely to have an internet connection at home, than their peers. 41% of households with a single adult aged 65 years and over had no household internet connection compared with 13% of households with two adults, at least one of whom was 65 years or older. 99% of contact from those married or in a civil partnership is digital.

Our complaints policy is the same for all customers regardless of their marital status and we do not restrict ways in which residents can contact us to make a complaint.

Pregnancy and maternity – Our complaints policy does not discriminate against pregnancy, maternity, or those who are adopting. We tailor our services to meet the needs of our customers.

Race – We have considered potential language barriers and can utilise an interpreter if required to ensure all groups have equal access. Cultural practices will be considered, and services tailored to meet the needs of our customers.

Religion and belief – General consideration is given for ethnic groups, for example, where some groups expect to have women or men only meetings. Our complaints policy deals directly with a complainant and not a group of complainants. Our services are tailored to meet the needs of individuals.

Sex – The complaints policy does not promote or advertise outcomes based on sex. It is inclusive and has been developed for all.

Sexual orientation – The complaints policy has not been designed based on assumptions of sexual orientation. Our services offer equal access regardless of sexual preferences.

3. Consultation.

How have you consulted staff and tenants/staff communities and representatives including those from protected groups? What were their views? Who else has been consulted in this proposal?

We have consulted with Head of Operations, Service Improvement Lead and Customer Engagement Officer which offers a range of individuals from protected groups.

4. Promoting equality.

Does this policy have a positive impact on equality? What evidence is there to support this? Could it do more?

Local Space understands the need for gathering equalities information to ensure a fair and accessible service is delivered to all our customers.

Further work is required to understand the demographics within our homes, as we do not hold a full list of all characteristics, but we will continue to collect and utilise this information to tailor our services.

The complaints policy offers equal opportunities for all customers and does not discriminate.

5. Monitoring

How will you monitor the actual impact that your proposal has had following its implementation? When will you do this?

IFF Research will conduct satisfaction surveys for complaints and feedback from our customers will enable us to monitor levels of satisfaction. We do not believe that we are discriminating against any of the protected characteristics based on our current data. When collecting and analysing future data samples, we will ensure that we continue to offer fair and accessible services, tailoring our services as appropriate. As part of the Tenant Satisfaction Measures surveys IFF Research carry out, they review and take a representative sample to ensure any findings can be analysed by protected characteristics.

6. Summary

Summarise the outcome of this equality impact assessment and state any actions you will be taking as a result.

Changes proposed to the complaints policy will not have a negative impact on our customers or employees. The changes to the policy are beneficial in ensuring we offer an inclusive service to meet the diverse needs of our customers, as set out by the Housing Ombudsman Service.

Has a [data protection impact assessment \(DPIA\)](#) been completed or considered for this project? If not, explain why a DPIA is not relevant to this project.

A DPIA is not required for this policy. Our complaints are recorded in line with GDPR requirements and data is not shared with or processed by third parties without a data sharing or data processing agreement.

DPIAs are mandatory under the General Data Protection Regulation (GDPR) when processing of personal data is likely to result in a high risk to individuals. A DPIA is designed to describe the processing of personal data, assess its necessity and proportionality, and help manage the risks to the rights and freedoms of data subjects which result from this processing, by determining measures to address the risks. This will help us to ensure we comply with our data protection obligations, reduce harm caused to individuals, and prevent reputational and financial damage to Local Space through a data breach.

Assessment lead: I confirm this equality impact assessment is an honest assessment of the Equality Impact of the proposed policy, practice, project or service.			
Name of assessment lead	Claire Naylor		
Signed	Claire Naylor	Date	25 January 2024
Head of Department/Director: I am satisfied with the results of this equality impact assessment and agree to ensure the actions will be undertaken to monitor the actual impact of the proposed policy, practice, project or service.			
Name of Head of Department/Director	Mark Kent		
Signed	Mark Kent	Date	25 January 2024