**Lisburn & Castlereagh City Council**

**Section 75 Equality and Good Relations Screening template**

**Part 1. Activity/Policy Scoping**

**Information about the activity/policy**

# Name of the activity/policy

|  |
| --- |
| **Customer Care Policy (Complaints, Comments & Compliments)** |

**Appendix I provides a copy of the reviewed LCCC Customer Care Policy.**

# Is this activity/policy

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| An existing policy? |  | A revised policy? | **X** | A new policy? |  |

A review of the LCCC Customer Care Policy has been undertaken to stipulate timescales at each stage of the complaints process to improve our timeliness of response.

During this review we were made aware of NIPSO’s (Northern Ireland Public Service Ombudsman) plans to recommend a standardised two staged complaints procedure throughout the public sector. This model is not likely to be launched until the end of 2021. When the best practice is released the Customer Care Policy will again be reviewed to ensure we are compliant as a Council.

What are the intended aims/outcomes the activity/policy is trying to achieve?

|  |
| --- |
| 1 The purpose of this policy is to provide a clear statement of intent with regards to the assessment, handling and investigation of customer complaints. |
| 2 The aim of this policy is to ensure that all customer complaints, either written or verbal, are handled in a consistent and regulated manner and that further complaint incidents are mitigated and where possible, prevented. |
| 3 This review of the policy stipulates timescales at each stage of the complaints process, in order to improve our timeliness of response. |

Are there any expected benefits to the Section 75 categories/groups from this activity/policy? If so, please explain

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| --- |
| The policy is aimed at everyone who uses LCCC services and is not targeted at any particular equality group. |

Who initiated or wrote the activity/policy?

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| --- |
| The policy was drafted by the Council’s Performance Improvement Officer and has been approved by the Corporate Management Team, it will be presented to the Corporate Services Committee for approval and eventually adopted by full Council. |

Who owns and who implements the activity/policy?

|  |
| --- |
| The policy is a corporate document and details the processes necessary for the assessment, handling and investigation of customer complaints. Complaints assessment and handling will be administered by the Customer Care Team who will then inform the relevant Department or Service. All Directors and Heads of Service are responsible for investigating complaints in relation to their service areas. Progress is co-ordinated and reported on by the Performance Improvement Officer to CMT and the Governance & Audit Committee. |

**Implementation factors**

Are there any factors which could contribute to/detract from the intended aim/outcome of the activity/policy/decision?

If yes, are they

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| Financial? |  | Legislative? |  | Other? | **X** |

If other, please detail below

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| --- |
| While commitments are included in the policy, it can be a challenge to ensure that they are actually implemented as intended. The successful implementation of the policy is dependent on awareness of the policy and delivery of training and support as necessary across all Council functions. |

**Main stakeholders affected**

Who are the internal and external stakeholders (actual or potential) that the activity/policy will impact upon?

|  |  |
| --- | --- |
| Staff | X |
| Service Users | X |
| Other Public Sector Organisations – please list | NIPSO (NI Public Services Ombudsman) |
| Voluntary/Community/Trade Unions – please list | X |
| Other, eg, Elected Members – please list | Elected Members |

**Other documents/activities/polices with a bearing on this activity/policy**

|  |  |
| --- | --- |
| **Name of document/activity/policy** | **Who owns or implements document/activity/policy?** |
| 1 Corporate Plan 2018-2022 <https://www.lisburncastlereagh.gov.uk/uploads/general/CORPORATE_PLAN_2018.pdf> | Chief Executive’s Office/all services |
| 2 Communications activity | Corporate Communications |
| 3 HR policies and activity | HR & OD |
| 4 Equality Scheme and associated equality policies and plans | Equality Officer |
| 5 NIPSO standardised two staged complaints procedure throughout the public sector (due at end of 2021)  <https://nipso.org.uk/> | NIPSO |

The above would include both internal and external documents/activities/policies. If there is a web-link/link to any of the above please provide details.

**Available evidence**

What evidence/information (both qualitative and quantitative) have you gathered to inform this activity/policy? Specify details for each of the Section 75 categories.

A range of sources have been considered, including the previous Customer Care Policy; analysis of previous complaints, evaluations of complaints handling, other Council Complaints policies, etc.

|  |  |
| --- | --- |
| **Sec 75 Category** | **Details of evidence/information** |
| Religious Belief | NI Census 2011 data for the Lisburn and Castlereagh area:  67% Protestant (or other Christian)  24% Catholic  8% Other  1% None |
| Political Opinion | National identity is often used as an indicator of political opinion – unionist/nationalist. Analysis of Census 2011 data for LCCC showed:  65.39% identified as British  14.83% Irish  30.46% Northern Irish  Political party representation on LCCC from local government elections 2019 (40 Members):  DUP – 15  UUP – 11  Alliance – 9  Sinn Fein – 2  SDLP – 2  Green Party NI – 1  Total – at least 64% unionist |
| Racial Group | NINIS statistics (2011 census) suggest 88.72% of the LCCC population were born in N Ireland. The same data indicates **2.36%** were from an ethnic minority **97.64%** were white (including Irish Traveller).  The LCCC area has a small population of Syrian refugees and a minority of residents will speak languages other than English as their first language. |
| Age | NISRA 2019 mid-year population estimates for LCCC area were:  0-15 years – 20.3%  16-64 years – 62.3%  65+ years – 17.4% |
| Marital Status | The 2011 census records for people over the age of 16 for the LCCC area:  Single (never married or never registered a same-sex civil partnership) – 30.7%  Married – 53.8%  In a registered same-sex civil partnership – 0.1%  Separated (but still legally married or still legally in a same-sex civil partnership) – 3.3%  Divorced or formerly in a same-sex civil partnership which is now legally dissolved – 5.5%  Widowed or surviving partner from a same-sex civil partnership – 6.7% |
| Sexual Orientation | Census data – no data available for sexual orientation. However, UK government statistics (ONS) estimate around 2% of the NI population identify as lesbian, gay or bi-sexual. Feedback from LGB support groups and from surveys suggests the percentage of people who identify as something other than 100% heterosexual may be much higher, with the 18-25 year age group significantly more likely to identify as LGB. Government Equalities Office research (2018) suggests over 4% of the 18-25 year age group identify as LGB, confirming that younger people are more likely to be open about sexual orientation. |
| Men & Women Generally | The estimated population of LCCC local government district at 30 June 2019 was 146,002, of which 71,654 (49.1%) were male and 74,348 (50.9%) were female.  There is no official statistic on the number of people in N Ireland who identify as Transgender or non-binary but referrals to advice services are increasing year on year which suggests a small but growing minority.  Women are significantly under-represented as Elected Members on LCCC with only 17.5% female councillors (NI average -  At present (April 2021), women are over-represented in the senior management team (3 of 5 (60%) senior staff are female). |
| Disability | The 2011 Northern Ireland Census collected data on ‘persons with a limiting long-term illness’ which covered any long-term illness, health problem or disability which limits daily activities or work. Statistics for LCCC showed:  **18.29%** of people had a long-term health problem or disability that limited their day-to-day activities;  **82.13%** of people stated their general health was either good or very good; and |
| Dependants | 2011 Census data:  **12.51%** of people stated that they provided unpaid care to family, friends, neighbours or others.  People with dependants includes parents of young children, parents of older dependant or disabled people, carers of elderly family members and others. |

### Needs, experiences and priorities

Taking into account the information referred to above, what are the different needs, experiences and priorities of each of the following categories, in relation to the particular activity/policy/decision? Specify details for each of the Section 75 categories

|  |  |
| --- | --- |
| **Sec 75 Category** | **Details of needs/experiences/priorities** |
| Religious Belief | No evidence of different experience or needs of people according to religion in relation to this policy |
| Political Opinion | No evidence of different experience or needs of people depending on their political opinion in relation to this policy |
| Racial Group | People who are from a minority ethnic background may face difficulties understanding their rights and how Council’s Complaints Policy is relevant to them. Information may need to be targeted to race support groups. Information or responses to complaints may need to be translated for someone who does not have English as a first language. |
| Age | Some older people may need additional help to understand the policy or to go through the process |
| Marital Status | No different experience/needs identified |
| Sexual Orientation | No different experience/needs identified |
| Men & Women Generally | No different experience/needs identified |
| Disability | Some disabled people may need to have information about the policy or responses to complaints provided in accessible formats as a reasonable adjustment. |
| Dependants | No different experience/needs identified |

**Part 2. Screening questions**

1 What is the likely impact on equality of opportunity for those affected by this activity/policy, for each of the Sec 75 equality categories? (minor/major/none\*)

|  |  |  |
| --- | --- | --- |
| **Sec 75 Category** | **Details of activity/policy impact** | **Level of impact (minor/major/none\*)** |
| Religious Belief | The measures in the Complaints policy will potentially benefit everyone, regardless of religious belief or any other personal characteristic | No differential impact identified |
| Political Opinion | The measures in the Complaints policy will potentially benefit everyone, regardless of political opinion | No differential impact identified |
| Racial Group | The measures in the Complaints Policy will potentially benefit everyone, regardless of racial background | No differential impact identified |
| Age | The measures in the Complaints policy will potentially benefit everyone, regardless of age | No differential impact identified |
| Marital Status | The measures in the Complaints Policy are intended to potentially benefit everyone, regardless of marital status | No differential impact identified |
| Sexual Orientation | The measures in the Complaints Policy are intended to potentially benefit everyone, regardless of sexual orientation | No differential impact identified |
| Men & Women Generally | The measures in the Complaints Policy are intended to potentially benefit everyone, regardless of gender. | No differential impact identified |
| Disability | The measures in the Complaints Policy are intended to potentially benefit everyone, regardless of disability. | No differential impact identified |
| Dependants | The measures in the Complaints Policy are intended to potentially benefit everyone, regardless of whether or not they have dependants. | No differential impact identified |

\*See Appendix 1 for details.

**2 Are there opportunities to better promote equality of opportunity for people within the Sec 75 equality categories?**

|  |  |  |
| --- | --- | --- |
| **Sec 75 Category** | **IF Yes, provide details** | **If No, provide details** |
| Religious Belief |  | None identified through this screening exercise. Can be kept under review over the life of the policy. |
| Political Opinion |  | None identified through this screening but can be kept under review. |
| Racial Group |  | Yes, the policy and responses to complaints can be translated if necessary for anyone who does not have English as a first language. |
| Age |  | Yes, any older person who needs additional help to understand the policy or with the process will have their needs met. For example, someone might need a staff member to phone them to explain something rather than just deal in written communication, etc |
| Marital Status |  | None identified |
| Sexual Orientation |  | None identified |
| Men & Women Generally |  | None identified |
| Disability |  | Yes, we are prepared to make reasonable adjustments for disability. The policy and response to complaints, etc, can be provided in alternative formats to ensure accessibility for people with certain disabilities. |
| Dependants |  | None identified |

**3 To what extent is the activity/policy likely to impact on good relations between people of different religious belief, political opinion or racial group? (minor/major/none\*)**

|  |  |  |
| --- | --- | --- |
| Good Relations Category | Details of activity/policy impact | Level of impact (minor/major/none\*) |
| Religious Belief |  | No specific impact identified through this screening exercise |
| Political Opinion |  | No specific impact identified |
| Racial Group |  | No specific impact identified |

\*See Appendix 1 for details.

**4 Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?**

|  |  |  |
| --- | --- | --- |
| Good Relations Category | IF Yes, provide details | If No, provide details |
| Religious Belief |  | Not at this time, but can be kept under review |
| Political Opinion |  | As above |
| Racial Group |  | As above |

**Additional considerations**

**Multiple identity**

Provide details of data on the impact of the activity/policy on people with multiple identities. Specify relevant Section 75 categories concerned.

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| --- |
| We are aware that most people have more than one identify and may experience additional disadvantage accordingly. We are proposing measures to accommodate the particular needs of different groups and multiple identity has been taken into account in developing this policy. |

**Part 3. Screening decision**

There are 3 screening decision outcomes, as noted below.

Choose only 1 of these and provide reasons for your decision outcome and ensure evidence is noted/referenced for any decision outcome reached.

|  |  |
| --- | --- |
| **Screening Decision Outcomes Options** | **Reasons/Evidence** |
| Option 1  Screen out without mitigation |  |
| Option 2  **Screen out with mitigation** | Equality screening of the Customer Care Policy has concluded that a full Equality Impact Assessment is not necessary. This is because no significant impacts have been identified for any equality group. However, we are proposing a number of mitigation measures to address potential issues. |
| Option 3  Screen in for a full EQIA |  |

**Mitigation (Relevant to Option 2)**

When the public authority concludes that the likely impact is ‘minor’ and an equality impact assessment is not to be conducted, the public authority may consider mitigation to lessen the severity of any equality impact, or the introduction of an alternative policy to better promote equality of opportunity or good relations.

Can the activity/policy/decision be amended or changed or an alternative activity/policy introduced to better promote equality of opportunity and/or good relations?

If so, give the **reasons** to support your decision, together with the proposed changes/amendments or alternative activity/policy.

|  |
| --- |
| As people who do not have English as a first language may have difficulty understanding the complaints policy and process, translation will be provided if required. Responses to complaints will also be translated if needed.  We will make reasonable adjustments for people with certain disabilities as required. For example, the policy and information about the process or responses to complaints can be provided in accessible formats as requested/required.  If an older person has difficulty understanding the policy or process, additional efforts will be made to help to ensure they are not disadvantaged. |

**Timetabling and prioritising (Relevant to Option 3) -** Not applicable

Factors to be considered in timetabling and prioritising activities/policies for equality impact assessment.

If the activity/policy has been **‘screened in’** for equality impact assessment, then please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1-3, with 1 being the lowest priority and 3 being the highest, assess the activity/policy in terms of its priority for equality impact assessment.

|  |  |
| --- | --- |
| **Priority criterion** | **Rating (1-3)** |
|  |  |
| Effect on equality of opportunity and good relations |  |
| Social need |  |
| Effect on people’s daily lives |  |
| Relevance to a public authority’s functions |  |
|  |  |
| Total Rating Score |  |

Is the activity/policy affected by timetables established by other relevant public authorities?

If yes, please provide details

|  |
| --- |
| N/A |

**Part 4. Monitoring**

Public authorities should consider the guidance contained in the Commission’s Monitoring Guidance for Use by Public Authorities (July 2007).

The Commission recommends that where the activity/policy has been amended or an alternative policy introduced, the public authority should monitor more broadly than for adverse impact (See Benefits, P.9-10, paras 2.13 – 2.20 of the Monitoring Guidance).

Effective monitoring will help the public authority identify any future adverse impact arising from the activity/policy which may lead the public authority to conduct an equality impact assessment, as well as help with future planning and activity/policy development.

Who will undertake and sign-off the monitoring of this activity/policy and on what frequency?

Please give details below:

|  |  |
| --- | --- |
| **Will be undertaken by:**  **Name & Position/Job Title:** | **Frequency (eg. Annually):** |
| Performance Improvement Officer in relation to the Policy as a whole | The policy will be reviewed annually. Complaints will be reported upon a quarterly basis through CMT & Governance & Audit Committee. |
| Departments and Services | All services and departments will carry out regular monitoring of complaints within their areas. |
|  |  |
| Will be signed-off by: |  |
| ***Caroline Magee - Head of Human Resources & Organisation Development*** |  |

**Part 5 - Approval and authorisation**

|  |  |  |
| --- | --- | --- |
| **Screened by:** | **Position/Job Title** | **Date** |
| Kerrie-Anne McKibbin | Performance Improvement Officer | 20/04/21 |
| Mary McSorley | Equality Officer | 20/04/21 |
|  |  |  |
| **Approved by:** |  |  |
| ***Caroline Magee*** | ***Head of Human Resources & Organisation Development*** | 20/04/21 |

Note: A copy of the Screening Template, for each activity/policy screened should be ‘signed off’ and approved by a senior manager responsible for the activity/policy, made easily accessible on the public authority’s website as soon as possible following completion and made available on request.

Appendix 1

Major impact:

1. The policy is significant in terms of its strategic importance;
2. Potential equality matters are unknown, because, for example, there is insufficient data upon which to make an assessment or because they are complex, and it would be appropriate to conduct an equality impact assessment in order to better assess them;
3. Potential equality and/or good relations impacts are likely to be adverse or are likely to be experienced disproportionately by groups of people including those who are marginalised or disadvantaged;
4. Further assessment offers a valuable way to examine the evidence and develop recommendations in respect of a policy about which there are concerns amongst affected individuals and representative groups, for example in respect of multiple identities;
5. The policy is likely to be challenged by way of judicial review;
6. The policy is significant in terms of expenditure.

Minor impact

1. The policy is not unlawfully discriminatory and any residual potential impacts on people are judged to be negligible;
2. The policy, or certain proposals within it, are potentially unlawfully discriminatory, but this possibility can readily and easily be eliminated by making appropriate changes to the policy or by adopting appropriate mitigating measures;
3. Any asymmetrical equality impacts caused by the policy are intentional because they are specifically designed to promote equality of opportunity for particular groups of disadvantaged people;
4. By amending the policy there are better opportunities to better promote equality of opportunity and/or good relations.

No (none) impact

1. The policy has no relevance to equality of opportunity or good relations;
2. The policy is purely technical in nature and will have no bearing in terms of its likely impact on equality of opportunity or good relations for people within the equality and good relations categories.

Appendix 2

The following documentation (as a minimum) should be available to support the screening outcome decision:

* A written copy of the activity/policy in question;
* The screening template duly completed with the screening decision made explicit;
* All evidence utilised/referenced to support the screening decision to be available.