

Equality & Health Impact Assessment (EqHIA)

Document control

Title of activity:	Complaints and Compliments Policy and Procedure
Lead officer:	Jodie Gutteridge Corporate Policy & Performance Lead
Approved by:	Caroline Little Head of Service, PMO, Executive Support, Complaints & FOIs
Scheduled date for next review:	July 2024 – when the policy is reviewed.

Did you seek advice from the Corporate Policy & Diversity team? Please note that the Corporate Policy & Diversity and Public Health teams require at least <u>5 working days</u> to provide advice on EqHIAs.	Yes
Did you seek advice from the Public Health team?	Yes
Does the EqHIA contain any confidential or exempt information that would prevent you publishing it on the Council's website? See Publishing Checklist.	No

Please note that EqHIAs are **public** documents and unless they contain confidential or sensitive commercial information must be made available on the Council's <u>EqHIA</u> <u>webpage</u>.

Please submit the completed form via e-mail to EqHIA@havering.gov.uk thank you.

1. Equality & Health Impact Assessment Checklist

Please complete the following checklist to determine whether or not you will need to complete an EqHIA and ensure you keep this section for your audit trail. If you have any questions, please contact EqHIA@havering.gov.uk for advice from either the Corporate Diversity or Public Health teams. Please refer to the Guidance in Appendix 1 on how to complete this form.

About your activity

ADC	out your activity	ı			
1	Title of activity	Complaints a	and Complim	ents Policy	and Procedure
2	Type of activity	Policy			
3	Scope of activity	guidance for	staff and cor ocial care cor	nplainants nplaints, ho	which will include on Members ousing complaints
4a	Are you changing, introducing a new, or removing a service, policy, strategy or function?	Yes	If the answer to either of these		
4b	Does this activity have the potential to impact (either positively or negatively) upon people from different backgrounds.	Yes	questions is 'YES', please continue to question 5. If the answer all of the		If the answer to all of the questions (4a, 4b
4c	Please use the use the answer please		& 4c) is ' NO ', please go to question 6 .		
5	If you answered YES:	Please complete the EqHIA in Section 2 of this document. Please see Appendix 1 for Guidance.			
6	If you answered NO:	N/A			

Completed by:	Jodie Gutteridge
Date:	07/06/2023

2. The EqHIA – How will the strategy, policy, plan, procedure and/or service impact on people?

Background/context:

This policy is aimed at anyone who is dissatisfied with any services delivered by the Council and is considering contacting us seeking a viable solution, as well as those who would like to praise or provide positive recognition for a job that you feel we have done well.

Our complaint process has been tailored to accommodate all complaints to ensure one clear consistent approach across all areas of the organisation, which will be more efficient and easier to communicate. This process will allow us to determine each complaint on its own merits. We will investigate all complaints to allow us to identify any service failures, and will review all compliments, which in turn will allow us to act on learning opportunities, ensuring the lessons learnt, both good and bad, reach those officers in the council who can affect change.

*Expand box as required

Who will be affected by the activity?

Anybody wishing to contact the Council to make a complaint or provide a compliment. This includes our residents, Councillors / MPs, stakeholders, partners and volunteers.

Protected Characteristic - Age: Consider the full range of age groups		
Please tick (,	Overall impact:
Positive		The number of people that live in Havering has increased over the last decade from 237,232 in 2011 to 262,052 in 2021. This is a 10.5% increase compared to a 7.7%
Neutral	✓	increase across London and a 6.6% increase across England.
Negative		The number of children aged under 18 has seen an increase of 15.2% (from 50,827 to 58,550), greatly outpacing the 4.8% and 3.9% increases in London and England, respectively. Havering now has a higher proportion of children aged 0-17 (22.3%) than 80% of local authorities in England. This increase is slightly lower than the latest ONS projections (2018). The ONS predicts that the 0-17 population will grow to 61,350 by 2031. Furthermore, Havering still has one of the highest proportions of older people aged 65+ in London (second after Bromley). The combined impact of having both a large older population and now a large (and growing) young population is that Havering now has the lowest proportion of working-age adults in London.

	There is no minimum or maximum age limit in which you can make a complaint and the Complaint and Compliment policy covers all complaint processes, including those statutory children's and Adult Social Care complaints.
	*Expand box as required
Evidence:	
	*Expand box as required
Sources used:	
Census 2021	

Protected Characteristic - Disability: Consider the full range of disabilities; including physical, mental, sensory, progressive conditions and learning difficulties. Also consider neurodivergent conditions e.g. dyslexia and autism.

the relevant box:		
Positive		In Ha
		is an
Maritral		Lond
Neutral	v	rono

Please tick (✓)

Overall impact:

In Havering an estimated 38,449 residents reported having a disability in 2021. This is an age-standardised proportion (ASP) of 15.3%, which is slightly lower than London (15.6%) and lower than England (17.7%). In Havering, an ASP of 6.6% reported that their day-to-day activities were limited a lot and 8.7% reported their day-to-day activities were limited a little, due to a disability.

Negative

29,742 households in Havering had at least one person with a disability. Of these households, 6,181 had two or more members with a disability.

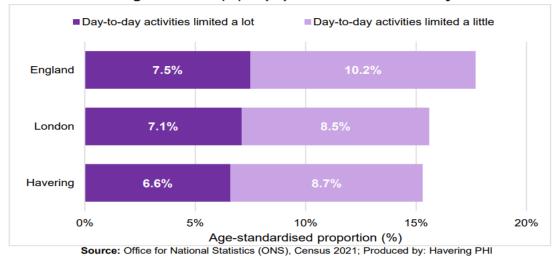
Having a disability doesn't affect the rights of the customers to make a complaint or compliment, however they may require additional support in order to do so, which is why we offer the option to complain and provide a compliment online, via the telephone, email or face to face.

*Expand box as required

*Expand box as required

Evidence:

Figure 4: ASP (%) of population with a disability



Sources used:

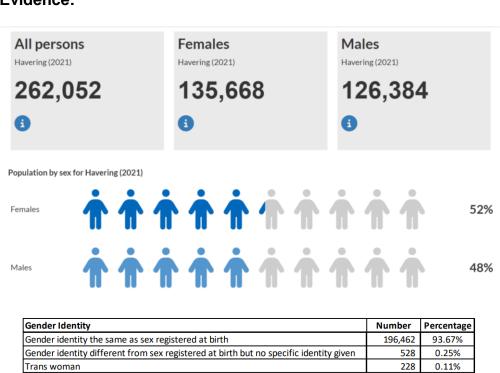
Census 2021

https://www.haveringdata.net/wp-content/uploads/2023/02/Census-2021-Topic-Summary-Health-Disability-and-Unpaid-Care.pdf

*Expand box as required

Protected Characteristic – Sex / gender: Consider both men and women			
Please tick (🗸) Ove		Overall impact:	
Positive		Havering has 135,668 females (52%) and 126,384 males (48%) in the borough. 93.67% of Havering residents identify as the same gender as when they were born.	
Neutral	✓	The policy explains our complaints procedure and a persons sex / gender will not	
Negative		affect how a customer contacts the council, so it's not considered likely that there will be a disproportionate impact of these proposals on this protected characteristic group.	
		*Expand box as required	

Evidence:



Gender Identity	Number	Percentage
Gender identity the same as sex registered at birth	196,462	93.67%
Gender identity different from sex registered at birth but no specific identity given	528	0.25%
Trans woman	228	0.11%
Trans man	212	0.10%
Non-binary	60	0.03%
All other gender identities	39	0.02%
Not answered	12,201	5.82%
Total	209,730	100.00%

Source: Office for National Statistics (ONS), Census 2021; Produced by: Havering PHI

Sources used:

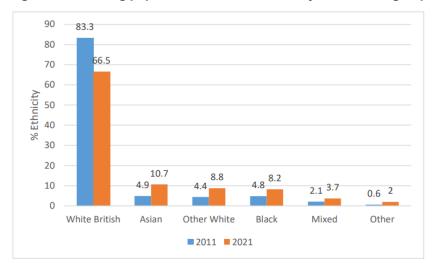
 $\underline{https://www.havering data.net/wp-content/uploads/2023/03/Topic-Summary-Sexual-orientation-and-gender-identity.pdf}$

www.Haveringdata.net

Census 2021

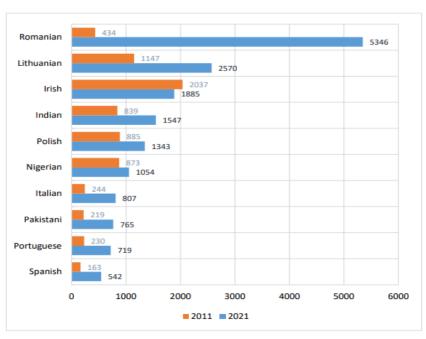
the relevant bo	Havering is becoming more diverse. In 2021 census, White British remains the most
	common ethnic group in Havering, with 66.5% (174,232) of the population, down
Neutral	from 83.3% (197,615) in 2011. The next most common ethnic group is Asian, accounting for 10.7% (28,150) of the population, up from 4.9% (11,545) in 2011.
Negative '	In 2021, 87.8% (230,091) of usual Havering residents identified with at least one UK national identity (English, Welsh, Scottish, Northern Irish, British and Cornish). This is a decrease from 93.6% (222,066) in 2011. The figure for London in 2021 is 73.1% an England 90.3%. People who identified with at least one UK and one non-UK identity accounted for 1.8% (4,843) of the Havering population in 2021; this is an increase from 0.7% (1,680) in 2011. Those selecting a non-UK identity only accounted for 10.3% (27,118) of the Havering population in 2021, which is an increase from 5.7% (13,486) in 2011. Among those who described a non-UK national identity, the most common response was those describing "Romanian" as their national identity 2.0% (5,346) up from 0.2% (434) in 2011. The most common responses in 2011 were Irish 0.9% (2,037) and Lithuanian 0.5% (1,147).
	90.1% of residents aged 3 and over describe their main language as English, next main languages Romanian 2.3% and Lithuanian 0.9%. 4.8% of households have no members where their main language is English. Although there are a number of residents who identify as non-uk, it is not considered likely that introducing this policy will have a disproportionate impact on
	this protected characteristic group, as the policy enables all customers the opportunity to complain or provide a compliment via different route, including on our accessible website. *Expand box as require
Evidence:	

Figure 1 – Havering population in 2011 and 2021 by main ethnic group



Source: Office for National Statistics (ONS), Census 2011 & 2021; Produced by: Havering PHI

Figure 6 - Top 10 national identity excluding British



*Expand box as required

Sources used:

Census 2021

Protected Characteristic – Religion / faith: Consider people from different religions or			
beliefs, inclu	beliefs, including those with no religion or belief		
١,	Please tick (🗸) the relevant box: Overall impact:		
Positive		The religion question is voluntary in the Census, but 94.5% of usual residents answered the question in 2021. The most commonly reported religion in Havering is	

Neutral	✓	Christian, with 52.2% of the total population in 2021 describing themselves as Christian. This is a reduction from 65.6% in 2011. No religion was the second most	
	common response, with 30.6% identifying in this category, up from 22.6% in 20 Other religions accounted for 11.7% of the total Havering population, which is a increase from 5.1% in 2011.		
Negative		The policy sets out the councils complaints and Compliments policy and procedure, so it's not considered likely that there will be a disproportionate impact of these proposals on this protected characteristic group. *Expand box as required	
Evidence:		*Expand box as required	
Sources us	ed:	,	
Census 2021		*Expand box as required	

Protected Characteristic - Sexual orientation: Consider people who are heterosexual,				
lesbian, gay or b	isexual			
Please tick (✓) the relevant box:		Overall impact:		
Positive		The Census question on sexual orientation was a voluntary question asked of those aged 16 years and over. The number of people responding was very		
Neutral	✓	high with 93% (195,099) of Havering residents answering the question. In total, 91.07% (191,007) of Havering residents identified as straight or		
Negative		heterosexual. In total, 1.95% (4,092) Havering residents identified as one of the LGB+ orientations ("Gay or Lesbian", "Bisexual" or "Other sexual orientation"). In total, 6.98% (14,631) Havering residents did not answer the question. The policy sets out the councils complaints and Compliments policy and		
		procedure, so it's not considered likely that there will be a disproportionate impact of these proposals on this protected characteristic group. *Expand box as required		

Evidence:

Figure 1: Detailed breakdown of sexual orientation in Havering for residents aged 16 and over

Sexual Orientation	Number	Percentage
Straight or Heterosexual	191,007	91.07%
Gay or Lesbian	1,993	0.95%
Bisexual	1,540	0.73%
Pansexual	436	0.21%
Asexual	56	0.03%
Queer	21	0.01%
All other sexual orientations	46	0.02%
Not answered	14,631	6.98%
Total	209,730	100.00%

Source: Office for National Statistics (ONS), Census 2021; Produced by: Havering PHI

Sources used:

Census 2021

https://www.haveringdata.net/wp-content/uploads/2023/03/Topic-Summary-Sexual-orientation-and-gender-identity.pdf

*Expand box as required

Protected Characteristic - Gender reassignment: Consider people who are seeking, undergoing or have received gender reassignment surgery, as well as people whose gender identity is different from their gender at birth

Please tick (✓) the relevant box:		Overall impact:	
Positive		The Census question on gender identity was also a voluntary question, asked of those aged 16 years and over. It was added to provide the first official data	
Neutral	✓	on the size of the transgender population in England and Wales. The question asked was "Is the gender you identify with the same as your sex registered at	
Negative		birth?" The number of people responding was very high with 94.2% (197,529) Havering residents answering the question. In total, 93.67% (196,462) Havering residents answered "Yes" and 0.51% (1,067) answered "No". 5.82% (12,201) Havering residents did not answer the question. The policy sets out the councils complaints and Compliments policy and procedure, so it's not considered likely that there will be a disproportionate impact of these proposals on this protected characteristic group.	
		*Expand box as required	

Evidence:

Figure 3: Detailed breakdown of gender identity in Havering for residents aged 16 and over

Gender Identity	Number	Percentage
Gender identity the same as sex registered at birth	196,462	93.67%
Gender identity different from sex registered at birth but no specific identity given	528	0.25%
Trans woman	228	0.11%
Trans man	212	0.10%
Non-binary	60	0.03%
All other gender identities	39	0.02%
Not answered	12,201	5.82%
Total	209,730	100.00%

Source: Office for National Statistics (ONS), Census 2021; Produced by: Havering PHI

*Expand box as required

Sources used:

Census 2021

 $\underline{https://www.havering data.net/wp-content/uploads/2023/03/Topic-Summary-Sexual-orientation-and-gender-identity.pdf}$

		cteristic - Marriage / civil partnership: Consider people in a marriage
or civil partn	ership	
Please tick (1	Overall impact:
the relevant b	oox:	-
Positive		The policy sets out the councils complaints and Compliments policy and procedure, so it's not considered likely that there will be a disproportionate impact of these
Neutral	✓	proposals on this protected characteristic group.
Negative		*Expand box as required
Evidence:		*Expand box as required
Sources us	ed:	
		*Expand box as required

Protected Characteristic - Pregnancy, maternity and paternity: Consider those who			
are pregnan	nt and	those who are taking maternity or paternity leave	
Please tick (the relevant		Overall impact:	
Positive		The policy sets out the council's complaints and Compliments policy and procedure, so it's not considered likely that there will be a disproportionate impact of these	
Neutral	✓	nronosals on this protected characteristic group	
Negative		*Expand box as required	
Evidence:		*Expand box as required	
Sources us	sed:	Expand box as required	

Socio-economic status: Consider those who are from low income or financially excluded backgrounds				
Please tick () the relevant box:		Overall impact:		
Positive		59.5% of residents in Havering have a job, an increase from 58.9% in 2011.		
Neutral		3.6% of residents are unemployed, which is the fourth lowest rate in London but an improvement from the rate of 5.0% in 2011.		
Negative	✓	21.0% of residents are retired - the highest rate in London, which is in line with or high older person population. Being on a low income or financially excluded doesn't necessarily mean customers / households will be disadvantaged by this policy, but this could mean that they do not have access to a computer, internet or a phone to make a complaint or compliment. However, if customers cannot access services online, or via the phone, the policy has made sure that we mitigate this by providing alternative channels like being able to make a complaint or compliment face-to-face at the Libraries.		
		*Expand box as required		

Evidence:

Table 1 Reasons for economic inactivity, Havering, London and England, 2021

Reason for economic inactivity	England and Wales	London	Havering
Economically inactive: Long-term sick or disabled	4.2%	3.6%	3.1%
Economically Inactive: Looking after home or family	4.8%	6.0%	5.1%
Economically inactive: Other	3.1%	4.1%	3.0%
Economically inactive: Retired	21.6%	12.9%	21.0%
Economically inactive: Student	5.6%	7.2%	4.6%

Source: Office for National Statistics (ONS), Census 2021; Produced by: Havering Insight Team

*Expand box as required

Sources used:

Please tick (✓) all | Overall impact:

Census 2021

Negative

 $\frac{https://www.haveringdata.net/wp-content/uploads/2023/02/Topic-Summary-Economic-Activity-and-Iravel-to-work-Final-Version.pdf}{}$

Health & Wellbeing Impact: Please use the Health and Wellbeing Impact Tool on the next page to help you answer this question.

Consider both short and long-term impacts of the activity on a person's physical and mental health, particularly for disadvantaged, vulnerable or at-risk groups. Can health and wellbeing be positively promoted through this activity?

the relevant boxes that apply:		In Havering an estimated 219,777 residents had 'good' or 'very good' health in 2021.		
Positive		This is an age standardised proportion (ASP) of 83.0%, which is higher than London (81.9%) and England (81.7%). However, in Havering, an ASP of 48.2% residents had		
Neutral	✓	'very good' health compared to 49% in London.		
		22.78% of those residents who completed the ONS annual population survey in 2020/21 self-reported their wellbeing as high anxiety. The policy sets out the council's complaints and Compliments policy and procedure,		
		Language and the second policy of the second policy		

so it's not considered likely that there will be a disproportionate impact of these proposals on this protected characteristic group. However the timescales for response, as outlined in the policy, could affect those with high anxiety. However the timescales have all been aligned following a public consultation. We have also included a Triage for all complaints in which there is 3 days in which the complaints are looked at and either progressed to stage one or responded to / resolved straight away.

Do you consider that a more in-depth HIA is required as a result of
this brief assessment? Please tick (✓) the relevant box

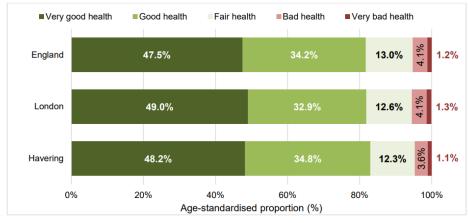
Yes

No

✓

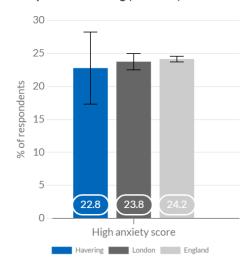
Evidence:

Figure 1: ASP (%) reported health of the population



Source: Office for National Statistics (ONS), Census 2021; Produced by: Havering PHI

Self-reported wellbeing (2020/21)



*Expand box as required

Sources used:

https://www.haveringdata.net/wp-content/uploads/2023/02/Census-2021-Topic-Summary-Health-Disability-and-Unpaid-Care.pdf

3. Health & Wellbeing Screening Tool

Will the activity / service / policy / procedure affect any of the following characteristics? Please tick/check the boxes below

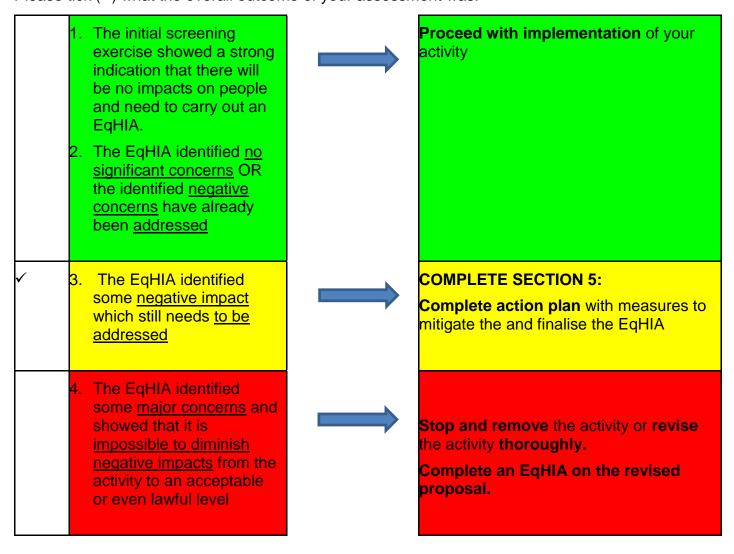
The following are a range of considerations that might help you to complete the assessment.

Lifestyle YES NO	Personal circumstances YES NO	Access to services/facilities/amenities YES \(\square\) NO \(\square\)
Diet	Structure and cohesion of family unit	to Employment opportunities
Exercise and physical activity	☐ Parenting	to Workplaces
☐ Smoking	Childhood development	to Housing
Exposure to passive smoking	Life skills	to Shops (to supply basic needs)
Alcohol intake	Personal safety	to Community facilities
Dependency on prescription drugs	Employment status	to Public transport
☐ Illicit drug and substance use	Working conditions	to Education
Risky Sexual behaviour	Level of income, including benefits	to Training and skills development
Other health-related behaviours, such	Level of disposable income	to Healthcare
as tooth-brushing, bathing, and wound	☐ Housing tenure	to Social services
care	Housing conditions	☐ to Childcare
	Educational attainment	to Respite care
	Skills levels including literacy and numeracy	to Leisure and recreation services and facilities
Social Factors YES NO	Economic Factors YES NO	Environmental Factors YES NO
Social contact	Creation of wealth	Air quality
Social support	Distribution of wealth	☐ Water quality
Neighbourliness	Retention of wealth in local area/economy	Soil quality/Level of contamination/Odour
Participation in the community	Distribution of income	☐ Noise levels
☐ Membership of community groups	Business activity	☐ Vibration
Reputation of community/area	☐ Job creation	☐ Hazards
Participation in public affairs	Availability of employment opportunities	Land use
Level of crime and disorder	Quality of employment opportunities	☐ Natural habitats
Fear of crime and disorder	Availability of education opportunities	Biodiversity
Level of antisocial behaviour	Quality of education opportunities	Landscape, including green and open spaces
Fear of antisocial behaviour	Availability of training and skills development opportunities	Townscape, including civic areas and public realm
Discrimination	Quality of training and skills development opportunities	☐ Use/consumption of natural resources
Fear of discrimination	☐ Technological development	☐ Energy use: CO2/other greenhouse gas emissions
☐ Public safety measures	Amount of traffic congestion	☐ Solid waste management
☐ Road safety measures		☐ Public transport infrastructure

4. Outcome of the Assessment

The EqHIA assessment is intended to be used as an improvement tool to make sure the activity maximises the positive impacts and eliminates or minimises the negative impacts. The possible outcomes of the assessment are listed below and what the next steps to take are:

Please tick (✓) what the overall outcome of your assessment was:



5. Action Plan

The real value of completing an EqHIA comes from identifying the actions that can be taken to eliminate/minimise **negative** impacts and enhance/optimise positive impacts. In this section you should list the specific actions that set out how you will mitigate or reduce any **negative** equality and/or health & wellbeing impacts, identified in this assessment. Please ensure that your action plan is: more than just a list of proposals and good intentions; if required, will amend the scope and direction of the change; sets ambitious yet achievable outcomes and timescales; and is clear about resource implications.

Protected characteristic / health & wellbeing impact	Identified Negative or Positive impact	Recommended actions to mitigate Negative impact* or further promote Positive impact	Outcomes and monitoring**	Timescale	Lead officer
Ethnicity	Negative – Language barrier	The policy enables all customers the opportunity to complain or provide a compliment via different routes, including on our accessible website, face to face (where an interpreter can be organized if booked in advance).	Monitoring the ethnicity of complainants and ensuring everyone is able to	Ongoing	Caroline Little
Socio-Economic	Negative – potential to not have access to internet, computer or phone	The policy has made sure that we providing alternative channels like being able to make a complaint or compliment faceto-face at the Libraries.	Performance monitoring of the number of complaints and compliments raised through face to face method. If we see a large number we will re-look at the methods of making a complaint / compliment.	Ongoing	Caroline Little

6. Review

In this section you should identify how frequently the EqHIA will be reviewed; the date for next review; and who will be reviewing it.

Review: This EqHIA will be reviewed in 2024 following the initial review of the Complaints and Compliments Policy and Procedure. Following this review the EqHIA will be reviewed thereafter every other scheduled review.

Scheduled date of review: July 2024

Lead Officer conducting the review: Caroline Little

*Expand box as required

Please submit the completed form via e-mail to EqHIA@havering.gov.uk thank you.