

Equality Impact Assessment (EqIA)

Please refer to the [Equality Impact Assessments \(EQIAs\)](#) form for details on how to complete.

The aim of an equality impact assessment is to consider the equality implications of any decision (e.g. new or revised policy, process, project, function, or service) on different groups of people including employees and customers. This document helps to evaluate whether the decision may inadvertently disadvantage groups of people and identify ways to avoid discrimination and proactively advance equality.

1. Details of the proposal

Name of the proposal:	Corporate Complaints Policy (Revised 2026)
Version number:	1
Does this proposal impact on people?	Choose an item: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Explain your answer whether 'yes' or 'no'	The policy affects access and inclusion, including digital exclusion considerations, with regards to corporate complaints
Is this a new or existing policy/project/service?	Choose an item: <input type="checkbox"/> New <input checked="" type="checkbox"/> Existing
Person responsible for the proposal:	Stephen Clayton
Person responsible for the EqIA (if different to above)	
Proposal start date:	08/04/2026
When will this proposal be implemented?	08/04/2026
Briefly describe the aims and objectives of the proposal	Ensure LGSCO compliance, accessibility, governance, fairer inclusive complaint handling, greater alignment with Housing Policy

What are the anticipated outcomes of the proposal?	As above
Who is likely to be affected by the proposal?	You can select multiple options: <input type="checkbox"/> Staff <input checked="" type="checkbox"/> Service users <input type="checkbox"/> Wider community
How are they likely to be affected?	Clarity around access and addressing barriers for digitally excluded.
Is this proposal going to be approved by SMB, Executive or Council?	Select: <input type="checkbox"/> SMB <input type="checkbox"/> Executive <input checked="" type="checkbox"/> Council
When is the proposal going to SMB, Executive or Council?	17/03/2026

3. Consultation & Engagement

You will nearly always need to involve and consult with stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal. This should include the individuals/groups who are affected by your proposal. Any proposal for consultation or engagement must be done via the [Consultation and Engagement Form](#).

<p>How are you communicating with the individuals/teams who are affected by your proposal?</p> <p>You can select multiple options:</p> <input checked="" type="checkbox"/> Social media <input checked="" type="checkbox"/> Focus groups – once agreed <input checked="" type="checkbox"/> Website <input type="checkbox"/> Mail drop <input type="checkbox"/> Via community group <input type="checkbox"/> Other (please describe):
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4. Impacts on People

How will the proposed change affect people with protected characteristics? Make sure that you assess the impact based on evidence.

- Who will benefit, who won't, who can access, who can't access, who is at an advantage, who is at a disadvantage?
- What evidence has been used for this assessment? For example, employee diversity data, national statistics, customer survey, feedback etc. [Sources of equality data](#) are available on Sharepoint. (Please don't include any information that risks identifying people such as names, or the diversity data, if less than six people).

Note: You can copy and paste more rows underneath each protected characteristic if there is more than one impact

How will this proposal affect people with protected characteristics?	Identify Impact:	Why will it have this effect? Use the evidence collated, any engagement or consultation to inform your thinking and record it here. Have you identified any gaps in evidence, if so, what are the gaps? Does this need to be incorporated in the action plan?
Age	Positive (Is an improvement)	According to research commissioned by the Council 9.9% of older residents lack internet; The policy's explicit acceptance of complaints made " <i>however made</i> " (phone/post/in-person) and reasonable adjustments reduces these barriers.
Disability: including sensory, mobility, mental health, neurodiversity, long term ill health	Positive (Is an improvement)	Disability is a core driver of digital exclusion, with NHS reporting that 69% of those lacking digital skills are disabled. The policy's commitments—reasonable adjustments, multiple channels, permitted advocates, and alternative formats—address these barriers directly.
Gender reassignment	No Impact	No evidence of disproportionate digital exclusion or policy barrier.
Marriage and Civil partnership (work related only)	Choose an item.	No evidence of disproportionate digital exclusion or policy barrier.

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Pregnancy & Maternity	Positive (Is an improvement)	Flexible channels (phone, assisted, written) support those with restricted mobility or limited time capacity due to childcare responsibilities.
Race: including ethnic origin, nationality/national origin	Positive (Is an improvement)	Language barriers may impact using websites and completing online forms, resulting in reliance on face-to-face or phone-based communication The policy addresses this by: <ul style="list-style-type: none"> • Allowing all channels • Supporting advocates • Improving written clarity • Offering reasonable adjustments and multilingual formats if requested
Religion or Belief	No Impact	No evidence of disproportionate impact.
Sex	No Impact	No evidence of disproportionate impact.
Sexual Orientation	No Impact	No evidence of disproportionate impact.
Intersectionality: Could this proposal have an impact on people who have a combination or intersection of two or more characteristics?	Positive (Is an improvement)	National research finds digital exclusion is concentrated where multiple disadvantages overlap : <ul style="list-style-type: none"> • poverty • housing insecurity • disability • ethnicity • low educational attainment (LGA)

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		The policy's emphasis on flexible channels and adjustments mitigates combined digital and social barriers.

7. Outcome of Assessment

Select one of the following options:	Tick the relevant box
No barriers identified, proceed with proposed change.	<input checked="" type="checkbox"/>
Adjust the proposal/policy to remove barriers identified by the EqIA.	<input type="checkbox"/>
Continue with the proposal/policy despite potential for adverse impacts.	<input type="checkbox"/>
Stop the proposal/policy as there are adverse impacts that cannot be prevented/mitigated or justified.	<input type="checkbox"/>
<p>Please explain why the option has been chosen:</p> <p>The policy provides clarity for groups facing digital exclusion, meets equalities legal duties and LGSCO guidance around accessibility, and aligns with evidence in the digital exclusion research.</p>	

8. Action Plan

Considering the impacts, you have identified above, please detail any actions you will need take to remove barriers, eliminate negative impacts or maximise opportunities. (Add more rows if required). If an action is to meet the needs of a particular protected group please specify this. These actions should be included in your Service Plan.

Action(s) to be taken.	Expected Outcomes	Responsible Person	Timescale	Progress	Complete
Ensure non-digital complaints routes are clearly promoted alongside online form	Mitigates exclusion for 10–15% digitally excluded residents	Head of Service – Customers & Communities	April 2026		
Record all reasonable adjustments and support needs on case files	Supports disabled and digitally excluded residents	Customer Experience Manager	April 2026		
Develop internal guidance and training for staff on supporting residents with low digital skills and inclusive communication	Ensures equity and consistency	Head of Service – Customers & Communities	Q3 2026		

9. Monitoring

How will you monitor the impact of your proposed change once it has been implemented? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective and your approach is still appropriate. Include the timescale for review in your action plan above.

- Tracking complaints by access channel
- Monitoring uptake of reasonable adjustments
- Review of equalities patterns logged in complaints data
- Annual EqIA refresh aligned with LGSCO self-assessment