

# RBKC Equality Impact Assessment (EqIA)

EqIAs evidence that you have considered the impact or potential impact on groups in our community who share protected characteristics. These are characteristics that are protected against discrimination by the Equality Act 2010. We are required by law under the Public Sector Equality duty (PSED) which is contained in Section 149 of the Equality Act and requires public authorities to have due regard to several equality considerations when exercising their functions.

**When do I need to complete an EqIA?** You need to complete an EqIA when:

- Planning or developing new services including business services, policies, strategies, practices and plans
- Reviewing, amending or substantially changing existing services, policies, strategies, practices and plans
- Considering a change management process or organisational review, particularly those that could involve relocating staff or rationalisation of posts
- Reviewing or introducing forms, leaflets, guidance, codes of practice such as changes to how residents access services
- When considering and developing a tender document for procurement of services

## **Who should complete an EqIA?**

The person completing the EqIA should have detailed knowledge of the proposal or project. They should be able to identify the impact on those with protected characteristics be they residents, workforce, visitors or others. They should also have knowledge or access to any consultations and where relevant, have knowledge of the area of the Borough that is impacted. The ownership and responsibility for an EqIA lies at Head of Service level and above, however, managers and staff play a key role in the assessment process as they will be involved in implementing the necessary actions identified and integrating equalities into planning. As a rule, any work that needs a decision e.g. Lead Member decision or Leadership Team should be signed off by the Executive Director. Anything that is not going through a formal decision-making process can be signed off by Head of service.

## **At what point do I need to complete an EqIA?**

You need to complete an EqIA at the very beginning when considering your proposal and therefore before a decision is taken.

**Please note an EqIA is a live document which means it must be regularly reviewed and updated considering new evidence or information.**

It is important to consider equalities issues at every stage of the process. You may not have all the data you need at the beginning, or you may not have finalised what your project will look like. However, an EqIA is there to help guide your thinking on how your work might affect different groups in our community and support your planning and consultation work.

## **Where can I get support to complete an EqIA?**

There are resources available on the SharePoint site, including example EqIAs. You can also get support from the EqIA Champion in your Team/Directorate, see the SharePoint site for details. You can email any queries to the EqIA inbox [eqia@rbkc.gov.uk](mailto:eqia@rbkc.gov.uk). Finally further support is available for strategic and crosscutting EqIAs from Mandeep Kaur Bains ([mandeep.kaurbains@rbkc.gov.uk](mailto:mandeep.kaurbains@rbkc.gov.uk)) in the Corporate Strategy Team. If your EqIA focuses on workforce changes or development, then contact Charlaine Nkum ([Charlaine.nkum@rbkc.gov.uk](mailto:Charlaine.nkum@rbkc.gov.uk)) or Lee Sykes ([lee.sykes@rbkc.gov.uk](mailto:lee.sykes@rbkc.gov.uk)) in HR.

## SECTION 1: Programme details

Name of the policy, project, service, or strategy being assessed	Annual Corporate Complaints Policy
Give a brief overview of your works aims and objectives	<p>The Council develops and implements a Corporate Complaints Policy which addresses all aspects of complaint handling, including redress and how it will deal with unreasonable complainants.</p> <p>The policy is intended to be open and transparent with customers about the complaints process, providing details about timescales, stages, how the Council aims to investigate complaints as well as the approach it will take to trying to put things right when things go wrong.</p> <p>The policy also aims to enable consistency in complaint handling as well as ensuring the Council can be held to account for the way it deals with complaints.</p>
Name of person completing this EqlA	Veronica Lazarus (Corporate Complaints, Learning and Improvement Manager)
Name of Director	Sophie Evans (Director for Customer Delivery)
Team	Customer Experience
Directorate	Resources
Contact Email	<a href="mailto:Veronica.lazarus@rbkc.gov.uk">Veronica.lazarus@rbkc.gov.uk</a> <a href="mailto:Sophie.evans@rbkc.gov.uk">Sophie.evans@rbkc.gov.uk</a>
Where is this EqlA stored. (This is to ensure colleagues can pick this up in your absence. )	
Is this EqlA accompanying a report that is going through a formal decision process?  If so which meeting, is it going to for decision?	Yes – This is a Key Decision Report which will be presented at Overview and Scrutiny Committee Meeting on <b>7 November 2023?</b>

## SECTION 2: EqIA Screening – Do you need to complete a full EqIA?

Please complete the checklist below, including impact to help determine if a full EqIA is necessary.

Please see table in Section 3 for a breakdown of the protected characteristics

Question	Answer (Yes, No, Unclear)	Impact (Positive, Negative or Neutral)
<b>Does your programme have the potential to disproportionately affect men, women or those who identify as non-binary?</b>	Yes	Positive
<b>Does your programme have the potential to disproportionately affect people of a particular race or ethnicity?</b> This includes refugees, asylum seekers, migrants and gypsies and travellers.	Yes	Positive
<b>Does your programme have the potential to disproportionately affect people with a disability?</b> Consider physical and learning disabilities and mental health conditions.	Yes	Positive
<b>Does your programme have the potential to disproportionately affect people of certain sexual orientations?</b>	Yes	Positive
<b>Does your programme have the potential to disproportionately affect people of different age groups?</b> Consider children and elderly populations.	Yes	Positive
<b>Does your programme have the potential to disproportionately affect those undergoing or intending to undergo the process of gender reassignment?</b>	Yes	Positive
<b>Does your programme have the potential to disproportionately affect those due to pregnancy or maternity?</b> The Equality Act protects women or birthing people from discrimination from when you become pregnant until your right to maternity leave ends and you return to work. If you do not have the right to maternity leave this is 2 weeks after the child is born.	Yes	Positive
<b>Does your programme have the potential to disproportionately affect those who are married or in a civil partnership?</b>	Yes	Positive
<b>Does your programme have the potential to disproportionately affect people of different faiths and beliefs?</b>	Yes	Positive
<b>Does your programme have the potential to disproportionately affect people on low incomes or living in poverty?</b>	Yes	Positive
<b>Does your programme have the potential to disproportionately affect people living in the most deprived areas of RBKC?</b>	Yes	Positive

Think about North Kensington, in particular Golborne, Notting Dale, Dalgarno and those living on the Worlds End Estate. There is further detail in Section 3 below in the socioeconomic and geographical box.		
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**If you have assessed the impact to any of the above questions to be Negative, Neutral or Unclear, then you will need to complete Sections 3, 4 and 5. If you have assessed the impact as Positive, explain the rational for this in the box below and then go to Section 5.**

The impact is positive because all citizens and service users will be able to make a complaint as at present, and there are a number of channels available to do this. If a potential complainant feels that there is a risk of discrimination associated with a protected characteristic they will now have the additional option of going to the corporate complaints team to inform them they have a complaint.

RBKC has an independent corporate complaints team that provides citizens and service users with the opportunity to directly lodge their complaint through the online channel, email, and via telephone. The corporate complaints team will signpost customers to appropriate organisations such as Age Concern, Citizens Advice, Action Disability Kensington and Chelsea and others where appropriate, so that they will have independent help in composing their complaint. To enable accessibility for those with learning difficulties, or do not speak English as a first language, or with sensory impairments, adjustments/adaptations will be made.

### **SECTION 3: Assessing the Impact**

Please use this section to assess the impact of the programme on those with protected characteristics. Please answer the following questions in your assessment for each characteristic.

- 1. How many people currently use the service? Or who and how many people will be affected by the policy or strategy?** We have provided data from the latest census on the population of RBKC for each protected characteristic. Additional Census data can also be accessed from the RBKC Census Dashboard. Please add data about your service users/populations in the relevant boxes.
- 2. What consultation have you completed to gather feedback from service users? Or what other relevant data have you gathered to support your work?** Include the findings in each relevant group.  
For more information on consultation please refer to the [12 principles of good governance and consultation in the Constitution](#). You can also speak with the Consultations Team for further advice.
- 3. How will you ensure that the policy, project, service, or strategy will be accessible to all groups? and how will you address or breakdown any barriers to achieving this.** Explain if your proposal takes steps to meet the needs of people from protected groups, where these are different from the needs of other people; and encourages people from protected groups to participate in public life or in other activities where their participation is disproportionately low?
- 4. How is this group impacted and determine whether the proposed activity will have a positive, neutral or negative impact.**
- 5. If the impact is negative, what mitigations will you put in place to reduce the impact?**
- 6. If the impact is positive, what actions have you taken to achieve a positive impact?**

Protected characteristic	Analysis	Impact (Positive, Negative or Neutral)
Age		
Disability		
Gender reassignment		
Marriage and Civil Partnership		
Pregnancy and maternity		
Race		
Religion/belief		
Sex		
Sexual Orientation		
<p><b>In addition to the nine protected characteristics, where relevant we ask that you also think about the socio-economic and geographical considerations of our residents. Some data has been included below for your reference.</b></p>		
<p><b>Socio-economic and Geographical</b></p>	<p>A recent report on data from the Index of Multiple Deprivation for 2019 showed that a high concentration of the most deprived Lower Super Output Areas being found in the Golborne, Notting Dale and Dalgarno wards.</p> <p>North Kensington also has higher numbers of people on low incomes, who are unemployed or who have no qualifications than the rest of the borough and has a higher proportion of social housing. There are also pockets of low income, higher unemployment, and lower skills levels in parts of the south and west of the borough, again in areas where there are greater proportions of social housing.</p> <p>According to recent ONS data RBKC continues to have the highest life expectancy in the country, however this varies between the north and the south, between people from different ethnic minorities, and between homeowners, private renters, and those in social housing.</p>	

	<p>ONS data also shows that life expectancy in the borough can vary significantly by different wards. There are larger gaps between the least and most deprived wards, these are as much as 14.8 years for males and 11.9 years for females. Females in Notting Dale live on average 15 years less than their neighbours in Holland Ward.</p> <p>The 2021 census data on general health of our residents shows that 58% of all residents, reported being in 'very good' health, 29.6 reported 'good' health, 10.1% reported 'fair health', 3.7% reported 'bad health' and 1.1% of residents reported 'very bad' health. However, these figures vary greatly across the Borough. Campden residents had the highest proportion reporting 'very good' health, 67.4% and Dalgarno in the north of the Borough had the lowest, 48.5%.</p> <p>Demographics of the Borough have been reviewed; specifically the cultural diversity within the Borough. However, it is noted that equalities data collected through complaints does not currently reflect this because the majority of complainants do not provide it.</p> <p>Listening Tool feedback has also been reviewed to inform the content of the policy, specifically responding to customers' views about being kept updated.</p> <p>RBKC has an independent corporate complaints team that provides citizens and service users with the opportunity to directly lodge their complaint through the online channel, email, and via telephone.</p>	
<p><b>Other Groups</b></p>	<p>Please consider groups that may be affected by your work, such as Grenfell Bereaved and Survivors, Carers and Members of the Armed Forces etc.</p> <p>N/A</p>	

## SECTION 4: Action Plan

Have you identified the need to reduce or remove any negative impacts, conduct work with those from protected groups to participate where their participation is disproportionately low, or fill any data gaps? If so, complete the Action Plan below to show the work that is planned.

Issue identified	Planned Action	Lead Officer and Timeframe
Residents say that they have inconsistent experiences when trying to access the complaints process.	Carry out a communications campaign to raise general, external awareness of the complaints	Hemali Cheema (Head of Customer Experience)

<p>We need to improve awareness and access to the complaints process.</p>	<p>process, including how residents can contact the complaints team directly.</p>	<p>Veronica Lazarus (Corporate Complaints, Learning and Improvement Manager)</p> <p>Comms Team</p>
<p>Some residents say that there is a fear of reprisal and that the Council needs to address residents' sensitivity around using the complaints process.</p> <p>We need to identify which services residents are apprehensive about raising complaints against.</p>	<ol style="list-style-type: none"> <li>1. Complaints Team to explore resident engagement feedback to identify if this is specific or wide-spread problem.</li> <li>2. Complaints team to work with the relevant services and support them to address and overcome residents' concerns about using the complaints process.</li> </ol>	<p>Hemali Cheema (Head of Customer Experience)</p> <p>Veronica Lazarus (Corporate Complaints, Learning and Improvement Manager)</p>
<p>Ensuring that those whose first language is not English are able to access the complaints policy and raise a complaint online.</p>	<p>Provide residents with the opportunity to translate the complaints page on the Council website into a language of their choice.</p>	<p>Hemali Cheema (Head of Customer Experience)</p> <p>Veronica Lazarus (Corporate Complaints, Learning and Improvement Manager)</p> <p>Web Services Team</p> <p>Comms Team</p> <p>Digital Inclusion Team</p>

## SECTION 5: Sign-off

<p>Director/ Head of Service Name</p>	<p>Sophie Evans/ Hemali Cheema</p>
<p>Contact Email</p>	<p><a href="mailto:Sophie.evans@rbkc.gov.uk">Sophie.evans@rbkc.gov.uk</a> <a href="mailto:Hemali.cheema@rbkc.gov.uk">Hemali.cheema@rbkc.gov.uk</a></p>
<p>Date of sign off</p>	
<p><b>Review</b>  <b>It is important to consider equalities issues at every stage of the process. Remember an EqIA is a live document which means it must be regularly reviewed and updated considering new evidence or information, for example, have you now completed your consultation or has there been news on funding. Please ask your Director or Head of</b></p>	

**Service to sign-off at every review stage. You can have as many reviews as are appropriate for your work.**

Date of 1 <sup>st</sup> Review	<b>20 October 2023</b>
Name of Reviewer	<b>Mandeep Kaur Bains</b>
Director signature	
Date of 2 <sup>nd</sup> Review	<b>26 October 2023</b>
Name of Reviewer	<b>Mandeep Kaur Bains</b>
Director signature	
Date of 3 <sup>rd</sup> Review	
Name of Reviewer	
Director signature	