


Equality Impact Assessment (EIA) Form

Please refer to the Equality Impact Assessment Guidance when completing this form.

<b>Step 1 – Overview</b>	
<b>Policy Name</b>	Complaints Policy
<b>Policy Lead</b>	Hazel Edwards Head of Customer Voice and Value
<b>Policy Author</b>	Dona Guy Customer Voice Co-Ordinator
<b>Equality Impact Assessment completed by:</b>	Dona Guy, Dave Lewis, Laura Gregory, James Sale, Paula Phillips-Steen, Carol Denning, Robin Cooper, Janine Hayter, Roger Woodward, Emma Wells
<b>Has an EIA previously been completed? If so when?</b>	Yes – October 2022. This EIA is being re-visited as part of the Complaints Policy being updated to ensure compliance with the Complaint Handling Code.
<b>Date EIA commenced</b>	28 <sup>th</sup> March 2024
<b>Date EIA completed</b>	28 <sup>th</sup> March 2024
<b>Briefly describe the aims, objectives and purpose of the policy</b>	
<p>The Complaints Policy seeks to ensure that any person who wishes to make a complaint to The Wrekin Housing Group (the ‘Group’) has the appropriate access to be able to communicate it with the Group, as well as to the right of fair and consistent treatment of the complaint and its resolution.</p> <p>While the Group does aim to get everything right first time, it does appreciate that on occasions something might be unsatisfactory and where this is the case the Group encourages feedback to be able to rectify any issues where possible and to learn from the complaint to help to improve service delivery for the future.</p>	
<b>Why is this EIA being completed?</b>	
This EIA is being re-visited following the Complaints Policy being updated to reflect the requirements of the Complaint Handling Code.	
<b>Who does the policy affect?</b>	
The Complaints Policy is intended to benefit the wider community and stakeholders of The Wrekin Housing Group, including: tenants or prospective tenants; residents and leaseholders; service users or their advocates; the general public and those who wish to report a complaint anonymously.	

<b>Step 2 – Screening</b>			
<b>Indicate whether you have identified a people impact</b>			
<b>Yes</b> Progress to step three		<b>No</b> Explain in the box below why there is no people impact and progress to step six	
<b>Explain why there is no people impact</b>			
<b>Step 3 – Research and Impact Assessment</b>			
<b>EIA Team Meeting</b>			
<b>Present</b>	<ul style="list-style-type: none"> <li>Dona Guy, Dave Lewis, Laura Gregory, James Sale, Paula Phillips-Steen, Carol Denning, Robin Cooper, Janine Hayter, Roger Woodward, Emma Wells</li> </ul>	<b>Date of Meeting(s)</b>	<ul style="list-style-type: none"> <li>28<sup>th</sup> March 2024</li> </ul>
<b>Consider the available data</b>			
<p>1. What existing sources of equality information (quantitative and qualitative) will you use to help you assess / mitigate the likely effect on different protected groups of people? <i>This could be profiling information and data / feedback from customers / complaints made and lessons learnt / statistical data / results of staff and customer surveys / inspection reports / anecdotal feedback</i></p> <ul style="list-style-type: none"> <li><b>Mystery Shopper work undertaken to objectively review the complaint’s process to identify strengths and weaknesses</b></li> <li><b>Reverse Engineering review to retrospectively look at last 12-month period to ensure the policy and procedure have not unintentionally negatively impacted upon any groups of people</b></li> <li><b>The policy and procedure make consider to the Code of Conduct Handling Code and the Equality Act 2010</b></li> <li><b>Risk Assurance Services LLP conducted an internal audit which provided Reasonable Assurance of the Group’s Complaint Framework</b></li> </ul> <p>2. What equality information gaps have you identified and how will you fill them?</p> <ul style="list-style-type: none"> <li><b>The policy and procedure will be discussed as part of this EIA meeting and any future actions will be noted (listed below) to assist with the policy review and to form an ongoing EDI action plan for completion to improve service delivery for The Wrekin Housing Group</b></li> </ul> <p>3. What research / consultation / engagement is required and what has already been carried out?</p> <ul style="list-style-type: none"> <li><b>The Complaints Policy receives consultation from Senior Management, Policy Users, Involved Resident group, the Executive Management Group and Service Quality Committee.</b></li> </ul>			

<b>Consider the potential or actual impact of the policy on each of the 9 protected characteristics</b>		
<b>Protected Characteristic</b> Refer to the EIA Guidance for definitions and descriptions.	<b>Summary of Impact</b> Outline the actual or potential impact associated with the policy. Is the impact positive or negative?	<b>Mitigation</b> If a negative impact, how will this be mitigated?
<b>Age</b>	<p>The Complaints Policy has a positive impact on this characteristic as it helps to promote fair and equal access for any person wishing to make a complaint to The Wrekin Housing Group;</p> <p>The policy and complaints form and procedure can be issued in a larger print document if requested, ensuring an easy-read version is available for any age group which may require it.</p> <p>The policy and complaints form and procedure can be issued in a paper-based format to help ensure it is accessible for anybody who may experience digital exclusion through not having the technical or equipment capabilities to be able to access and complete a complaint form via an online submission.</p> <p>Equally, for anybody who is very technically savvy and would prefer this as a method of communication, they would not be restricted that a complaint can only be made in writing; the Group has several social media channels which do allow for communication to be made both formally or informally, which will be followed up by a member of staff upon receipt of notification.</p> <p>The policy and the Group's website both list several ways in which a complaint -and compliment- can be made. This is helpful and transparent to all complainants to be able to source a suitable method for all. For example, some age groups of people may prefer to write to the Group using the postal option, whereas some groups may lack confidence to be able to log a complaint in-person and the open and fair procedure should encourage all ages to be able to approach the Group with their complaints via any option. The Group encourages this to be able to reflect and learn upon all feedback received.</p> <p>The timescales to make a complaint, and to receive the Group's response to a complaint made, are the same regardless of the complainant's age or age group. The timescales showing in the policy are set by the Housing Ombudsman and are fair for all complainants, regardless of this characteristic. If timescales need to be extended for a customer to provide evidence to the Group or respond to correspondence from us due to exceptional circumstances (such as a customer being rushed in to hospital for example) this can be requested by the customer and the Group will respond appropriately. Each complaint and request will be dealt with on an individual basis. We try to do everything as quickly as we</p>	<p>As part of the review of the policy, we have strengthened the way that any individual can contact us to make a complaint and will foster an approach that everyone is responsible for managing complaints. At the end of every survey sent to customers, it is highlighted how complaints can be made to the Group. The ability for front line staff, such as tradespeople, to log a complaint on Homecheck has also been introduced, if they feel that a complaint is being made through conversations with our customers. A member of the Customer Voice and Value Team will contact the tenant to ask how we can assist, help and put things right. Homecheck Training will be implemented for all trades so that they know how to use this system and are able to log complaints where necessary.</p> <p>Learning Pathways are being completed for all staff at Wrekin and we need to ensure that complaints training, including how to effectively log a complaint on Homecheck, is provided to all front-line customer facing staff.</p>

	<p>can in discussion with the customer to reach a satisfactory resolution and avoid any further negative impacts on an individual, whether this be their physical or mental health.</p> <p>The Group's website has been changed to reflect our ageing communities; icons have been included as a visual aid to illustrate the procedure to help with understanding and to negate the need for too much text on screen.</p> <p>There are 'complaints' posters and leaflets available throughout the Group's various shops and care schemes to further advertise that the Group is encouraging of all feedback, both complaints and compliments, to be received from any person of any age in our communities who might become impacted by our services, staff, care or housing.</p> <p>Any member of staff is able to take details of a complaint, which could transpire from a person walking into a Group building, to a member of staff who might happen to be in the complainant's presence at the time of a complaint being made, such as a Housing Executive. The Complaints procedure further details the way to handle this situation to ensure fairness, consistency and sensitivity is applied.</p>	
<p><b>Disability</b></p>	<p>The Complaints Policy has a positive impact on this characteristic as it helps to promote fair and equal access for any person to be able to make a complaint to The Wrekin Housing Group;</p> <p>The Group can provide copies of the policy and procedure in alternative formats if requested, such as Braille or larger-print versions.</p> <p>The accessibility option on the Group's website shows several options which are available. Reachdeck is used to help any person with sight, hearing or webpage usage limitations. The website also signposts to both digital and non-digital options to use to log a complaint.</p> <p>Any person, in a 3<sup>rd</sup> party capacity, can make a complaint on behalf of another person to ensure that a complaint can always be made regardless of any physical or mental disability that the complainant may have, which may have otherwise become a barrier to accessing the complaints procedure.</p> <p>Every complaint is listened to and will be responded to within the timescales as advised. However, there may be times when a timescale cannot be adhered to, such as if the complainant is in temporary respite or hospital care, for example, and cannot continue with the complaint within the specified timeframes. In such circumstances, the timescales can be flexed and will be communicated and mutually agreed upon, conducted on a case by case basis.</p>	<p>The Complaints Policy could have a negative impact on this characteristic, as although it helps to promote fair and equal access for any person to be able to make a complaint to the Group, people with poor health or ability could find it challenging to complain within the prescribed timescales. To help mitigate this at a time when a person may be feeling unwell or unwilling to complain or respond with the timescales, discretion can be applied on a case by case basis to the timescales as appropriate.</p> <p>The Housing Teams are currently completing a 'Getting to Know You' campaign so we can capture more details about our customers who we have not had much contact with in a long period of time.</p> <p>Consideration to be provided to the wider communication and accessibility of policies and how complaints can be made generally. Can this information be shared in a text, email, letter, posters on notice boards at the Shireliving and Retirement Living Schemes or through a voice note? Accessibility to policies was also raised in the Repair and Maintenance Policy EIA and the Risk and Policy Manager will provide further thought to this.</p>

	<p>For any person experiencing hearing limitations, there are alternative ways to make a complaint which does not have to be limited to a phone call for example. Other options are available such as in-person, via the MyWrekin App or via text or post or email.</p> <p>The Policy has a positive impact on the characteristic of disability as reasonable adjustments will be made and each complaint will be responded to on an individual level. If a tenant or occupier of a Group property has autism for example, and their complaint is having a negative impact on their health because of this, we will provide compensation that is reasonable to the case and will go above and beyond to ensure that there is an appropriate solution.</p> <p>The Complaints Policy ensures that we comply with the Local Government &amp; Social Care Ombudsman for our residents who live in our care settings and LD Homes. Third parties can make complaints on behalf of individuals who live in these properties.</p> <p>We need to ensure that we are reaching people who are blind and that they know how to make a complaint. We promote the complaints process as widely as we can but leaflets and surveys will not work for these individuals. This ties in with the data that we hold on customers. If we know that a tenant is blind, this should be recorded on Cadre and a symbol could be on the home page of the property. We should also ensure that any communications that are sent to these customers are in their preferred format – brail for example – although not all blind people will read braille.</p>	<p>Details of how to make a complaint are at the bottom of surveys or on the back of letters in small print. We should consider re-ordering this so there is more focus and awareness on how customers can make a complaint. This can be explored through the EDI Assurance Review that is currently being completed on communication with our customers.</p>
<b>Gender Reassignment</b>	<p>The Complaints Policy has a positive impact on this characteristic as it helps to promote fair and equal access for any person to be able to make a complaint to The Wrekin Housing Group.</p>	
<b>Marriage and Civil Partnership</b>	<p>The Complaints Policy has a positive impact on this characteristic as it helps to promote fair and equal access for any person to be able to make a complaint to The Wrekin Housing Group;</p> <p>The person who makes the complaint becomes the ‘complainant’ when the matter is recorded, which doesn’t have to be the lead tenant of the property. However, for transparency of communication thereafter, any responses will be made to all named tenants of the household.</p>	
<b>Pregnancy and Maternity</b>	<p>The Complaints Policy has a positive impact on this characteristic as it helps to promote fair and equal access for any person to be able to make a complaint to The Wrekin Housing Group;</p> <p>Timescales can be flexed to accommodate for medical appointments, bereavements or unplanned/ early/ late labours.</p>	

<p><b>Race</b></p>	<p>The Complaints Policy has a positive impact on this characteristic as it helps to promote fair and equal access for any person to be able to make a complaint to The Wrekin Housing Group;</p> <p>The accessibility option on the Group's website shows several options which are available – such as using Reachdeck and the translation of webpages using the 'Translate This Page' function at the foot of the webpage. This function will convert the web content into multiple languages to help to overcome this barrier if English was not an individual's preferred written or spoken language.</p> <p>The Group can help to guide a complainant through the process, should a family member or 3<sup>rd</sup> party not be available to assist, and the Group can help this further by accessing an interpreter if needed. Awareness needs to be raised about the translation service that staff can access if they need it. It will be explored whether information about this can be added to the Knowledge Library on Workplace.</p>	<p>The group's website can be translated into multiple languages using the drop-down option at the footer of the webpage. However, this doesn't apply to images or downloaded documents, although these can be supplied to the complainant upon request.</p> <p>There is a universal symbol on the Group website that individuals can click on to change the language of the website or have the page read aloud. Unless you know what the symbol means and represents, you would not know to click on it to change the language. Consider whether a page can be added to the Group website which explains what each symbol on the website means.</p>
<p><b>Religion or Belief</b></p>	<p>The Complaints Policy has a positive impact on this characteristic as it helps to promote fair and equal access for any person to be able to make a complaint to The Wrekin Housing Group;</p> <p>The Group's complaint's process aims to remain as accessible as possible around religious holidays and festivals; phonelines are in operation 8am to 8pm, the online services and email are available on a 24/7 basis, the postal service is available 6 days a week and staff are available in-person during opening hours at Group's premises.</p> <p>At Group's discretion, timescales can be flexed to accommodate any festivities which may interrupt the complaint resolution process.</p> <p>The Group does observe the Christian holiday season and is closed for Christmas; however, complaints can still be received during this time and will be handled as soon as staff members return in the following January. Skeleton staff continue to work in the Contact Centre, operational and care teams during the Christmas break so the complainant can still speak to a member of staff and be advised that their complaint has been received. If a complaint relates to an emergency repair, these will still be completed at any time through the Group's 8-8 repairs service which is delivered 365 days a year.</p> <p>When a complaint is made, no protected characteristics are known at that time. However, information relating to this characteristic may be disclosed by the complainant where it may be appropriate to make reasonable adjustments such as sending particular tradespeople to the property or having two people in attendance at a time, etc. to ensure we do not discriminate against any person's religious beliefs. The Group holds only a small proportion of data relating to religion and belief for our customers. Conversations about completing a customer census have previously taken place and it will be followed up</p>	<p>Consideration to be provided to 'Christmas' being referred to as the December Holiday on our website and in communications with our staff and customers.</p>

	whether a decision has been made about this. If it has been decided to complete a customer census, an update about progress will be requested.	
<b>Sex</b>	The Complaints Policy has a positive impact on this characteristic as it helps to promote fair and equal access for any person to be able to make a complaint to The Wrekin Housing Group.	
<b>Sexual Orientation</b>	The Complaints Policy has a positive impact on this characteristic as it helps to promote fair and equal access for any person to be able to make a complaint to The Wrekin Housing Group.	
<b>Socio-Economic Groups</b>	<p>When a complaint is logged, information is required as to who to liaise with regarding the progress made and any resolution reached. On occasion there may be no fixed abode for the complainant, however the Group can assist with this by offering multiple options of communication and permitting another party to act on a person's behalf to make a complaint.</p> <p>Social Economic Status could determine whether an individual has access to the internet or a phone. This could impact on their ability to raise a complaint or complete a CX survey which is completed through digital means. We need to ensure that we are using a range of methods to communicate with our customers so they know how to make a complaint and can do this in various formats.</p>	
<b>Safeguarding Issues:</b>	<p>In the review of this policy are there any considerations that need to be made from an EDI perspective with regards to safeguarding issues, modern slavery, domestic abuse?</p> <p>Upon receipt of a complaint, any safeguarding issues would be unknown at that time. However, if any concerns were identified through further investigations and contact made with the complainant, these would be appropriately handled and reported via the Group's internal 'See Something Say Something' processes.</p> <p>A complainant could be a victim of domestic abuse and only able to contact the Group to make a complaint or provide further details when the perpetrator is not around. If a complaint was raised and an individual in this situation had not made contact within the required timeframes (or a period of a few months) to continue with their complaint, the Group has discretion to extend the time period if they are made aware of the situation. A customer can re-open a complaint up to 12 months after it was initially raised if the Group is kept in the know. Customers are at the heart of the complaints process and the Group will tailor its approach to dealing with a complaint in the most appropriate way.</p> <p>A Complaints EDI Assurance Review is completed annually. Consider whether we can extend this review to cover any known cases of domestic abuse and whether there was an impact on timeframes and how the complaint was dealt with as a result of this. Explore whether these individuals were signposted to the necessary support services or if the Group was able to provide further support, help and guidance to these individuals.</p>	

Step 4 – Action Plan			
Action	Responsibility	Timeframe	Comments
Complaints Toolkit on the intranet contains out of date (past-employee (MB)) contact number <u>Complaints Toolkit (wrekin.com)</u>	Marketing	Completed	
Reasonable adjustments policy to be considered	EDI Steering Group/ Risk and Policy Team	Completed	It has been agreed that a standalone Reasonable Adjustments Policy will not be introduced. The Equal Opportunities Policy states <i>'We will make reasonable adjustments where necessary to overcome any disadvantages due to disabilities'</i> ; and <i>'We will ensure that we communicate and provide information in accessible formats and language that is easily understood'</i> . A sentence will be added to all relevant policies that we will make any reasonable adjustments that are needed or necessary when delivering our services. The Equal Opportunities Policy and EDI Strategy will be referenced in the Policy Control Sheet of the policies where this statement is made.
Considerations made to the Complaints webpage on the Wrekin website <u>Compliment or complaint   The Wrekin Housing Group</u>	Dona Guy / Marketing	December 2022	Moving icons to the top? Communications options to be noted under complaints too? (currently under compliments and a link to make a complaint – reads as though that is only method available for complaining)
Review our customer disclosed data to find most common languages	BIA Team / CV&V Team	December 2022	Look to develop a suite of customer-facing policies which are made available in multiple languages
Learning Pathways are being completed for all staff at Wrekin and we need to ensure that complaints	Janine Hayter / David Lewis		



<p>training, including how to effectively log a complaint on Homecheck, is provided to all front-line customer facing staff.</p>			
<p>Consideration to be provided to the communication and accessibility of policies and how complaints can be made generally.</p>	<p>Customer Voice and Value Team / Risk and Policy Manager</p>	<p>Summer 2024</p>	
<p>The Customer Insight Manager had been exploring whether symbols for vulnerabilities could be added to Cadre so this is clear to staff who are logging a complaint on the system. Follow up the progress of this and whether it has been agreed to take this work forward.</p>	<p>Customer Engagement Manager</p>	<p>April 2024</p>	
<p>Follow up with the EDI Steering Group whether a decision has been made to complete a Customer Census</p>	<p>Risk and Policy Manager</p>	<p>12<sup>th</sup> April 2024</p>	
<p>Consideration to be provided to 'Christmas' being referred to as the December Holiday on our website and in communications with our staff and customers.</p>	<p>EDI Steering Group / Risk and Policy Manager</p>	<p>12<sup>th</sup> April 2024</p>	
<p>Consider where details about how to make a complaint are visible on Group letters and CX surveys. To be picked up through the EDI Assurance Review on communication with our customers</p>	<p>Head of Marketing and Communications / Customer Voice and Value Team</p>		
<p>Awareness to be raised about the translation service that staff can access if they need it.</p>			
<p>Consider whether a page can be added to the Group website which explains what each symbol on the website means.</p>	<p>Marketing and Communications Team</p>		
<p>Explore whether any complaints made were linked with any known cases of domestic abuse through the annual complaints EDI Assurance Review.</p>	<p>Head of Customer Voice and Value / Risk and Policy Manager</p>	<p>Q4 – 2024/25</p>	

Consider whether outcomes of complaints relating to the protected characteristics can be added to the Knowledge Library on Workplace so that learning can be shared across the organisation and so that consistent approaches are being taken and delivered.	Customer Voice and Value Team	Summer 2024	
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### Step 5 – Making a judgement

Having considered the potential or actual impact and the action plan, indicate what action you intend to take.

<b>Option 1</b> - no change	The assessment demonstrates that the policy is robust and there is no potential for discrimination or negative impact. All opportunities to promote equality are being taken.	✓
<b>Option 2</b> - adjust the policy	The assessment identifies potential negative impact or missed opportunities. Remove or adjust certain aspects or introduce mitigating actions to reduce the impact.	
<b>Option 3</b> – remove the policy	The policy shows actual or potential unlawful discrimination. It must be stopped and removed or significantly changed. Document the removal of any significant changes in the Action Plan.	

### Step 6 – Approval and Housekeeping

This assessment was approved by:

<b>Name</b>	Hazel Edwards
<b>Job title</b>	Head of Customer Voice and Value
<b>Contact number</b>	07816510472
<b>Policy Control Sheet - date of EIA updated</b>	Yes
<b>Copy of EIA forwarded to Risk and Policy Team</b>	Yes

<b>Step 7 – Annual Review of EIA</b>			
<b>Action</b>	<b>Date reviewed</b>	<b>Reviewed by</b>	<b>Summary of review</b>