

## Section 4 Integrated Impact Assessment

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| Interim report |  | Final report | X |
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(Tick as appropriate)

### 1. Title of proposal

The City of Edinburgh Council – Managing Customer Complaints.

### 2. What will change as a result of this proposal?

The Council introduced its Complaints Handling Procedure in April 2012. This was based on recommendations and guidance from the Scottish Public Services Ombudsman (SPSO) and related to the Council’s complaints process.

As part of a Complaints Improvement Plan, a Corporate Complaints Policy was introduced in 2013 to reinforce the Complaints Handling Procedure, with a particular emphasis on roles and responsibilities. Together both documents provide the Council with a framework for managing complaints.

Both documents were lightly refreshed April 2021, with the addition of a new ‘Resolved’ category as a potential complaint outcome. This change was again mandated by the SPSO and highlighted to Council committee as part of the policy refresh cycle in February 2021.

As the framework continues to evolve with further changes planned (including the introduction of a new complaints process for use by children and young people), there is a need to carry out a renewed assessment of impacts through the Integrated Impact Assessment process to ensure that the Council’s complaints framework is ‘fit for purpose’ and used in an appropriate way, and that impacts (with particular regard to impacted population groups) are properly understood and communicated.

### 3. Briefly describe public involvement in this proposal to date and planned

The public have not been directly involved in this IIA because the Council’s complaints framework has not significantly changed. However, the consultation group convened as part of this process consisted of highly experienced individuals, from complaint or customer settings, with a depth of knowledge concerning complaint processes and issues. The group was also

representative of different areas of the Council and was able to offer practitioner and strategic insight into the complaints process.

**4. Is the proposal considered strategic under the [Fairer Scotland Duty](#)?**

No.

**5. Date of IIA**

Thursday, 6 October 2022.

**6. Who was present at the IIA? Identify facilitator, Lead Officer, report writer and any partnership representative present and main stakeholder (e.g. NHS, Council)**

| <b>Name</b>  | <b>Job Title</b>  | <b>Date of IIA training</b> |
|--|---|-----------------------------|
| Kevin Wilbraham, Lead Officer, Facilitator & Report Writer | Information Governance & Strategic Complaints Manager (Corporate Services)                      |                             |
| Ronnie Henderson, Note Taker                               | Strategic Complaints Officer (Corporate Services)   |                             |
| Brian Henderson  | Senior Practitioner; Professional Adviser; Advice & Complaints Officer (Communities & Families) |                             |
| Gavin Thomson  | Advice & Complaints Officer (Communities & Families)  |                             |
| Debbie Stephen   | Advice and Complaints Lead (Edinburgh Health & Social Care Partnership)                         |                             |
| Alasdair Oliphant  | Advice and Complaints Lead (Edinburgh Health & Social Care Partnership)                         |                             |
| Stephanie Hayward  | Customer Contact Officer (Corporate Services)   |                             |

**7. Evidence available at the time of the IIA**

| <b>Evidence</b>   | <b>Available – detail source</b>                                     | <b>Comments: what does the evidence tell you with regard to different groups who may be affected?</b> |
|---|--|---|
| Corporate Complaints Policy   | <a href="#">Complaints policy</a>                                    | Current policy  |
| Managing Customer Contact in a Fair and Positive Way Policy                                       | <a href="#">Managing customer contact in a fair and positive way</a> | Current policy  |
| Council Complaints Procedure (Based upon the SPSO Model Complaints Handling Procedure)            | <a href="#">Complaints procedure</a>                                 | Current procedure   |
| Cambridge City Council Equality Impact Assessment   | Attached   | Current IIA (comparison example) – attached.  |
| Scottish Social Services Council Impact Assessment - Complaints Handling Procedure (CHP) revision | Attached   | Current IIA (comparison example) – attached.  |
| Scottish Borders Council Revised Complaints Handling Procedure Integrated Impact Assessment       | Attached   | Current IIA (comparison example) – attached.  |

**8. In summary, what impacts were identified, and which groups will they affect?**

| <b>Equality, Health and Wellbeing and Human Rights</b>   | <b>Affected populations</b>   |
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| <p><b>Positives</b></p> <p>The complaints process is available to all residents and visitors who make use of City of Edinburgh Council services. The procedure can be accessed through a number of pathways such as a dedicated email address, customer service telephone number, and complaints card and leaflet that is made available through all Council frontline offices, facilities, and schools.</p> <p>Reasonable adjustments are made to allow all groups to use the procedure to make a complaint, including multi modal approach to making complaints, and the availability of translation facilities</p> <p>Advocacy services are available for all customers, including those with long term health and Mental Health issues.</p> <p>The policy and procedure apply to all customers regardless of protected characteristics and set out how complaints can be made in a people centred way.</p> | <p><b>Population groups</b></p> <p><b>Older people</b><br/> <b>Young people and Children</b><br/> <b>Care experienced adults and young people</b><br/> <b>People with disabilities</b><br/> <b>People with long term health and Mental Health issues</b><br/> <b>Ethnic minority groups</b></p> |
| <p><b>Negatives</b></p> <p>People on the periphery of society are often in receipt of Council services. If difficulties are experienced by individuals, it may create barriers around accessing Council complaints procedure. Appropriate signposting and access to complaints procedure information needs to be carefully considered in this context. Ethnic minority groups / asylum seekers may also have limited access to the complaints process. Further work is required to ensure complaints information is more widely available to reduce potential negative impacts, particularly around</p>  |   |

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| <p>ensuring access to advocacy services and support.</p> <p><b>Positives</b></p> <p>There is on-going work at a national level which is aimed at making easier for children to make a complaint. For example, Who Cares Scotland? is looking at advocacy rights for children in relation to making a complaint. The SPSO has also initiated a project to introduce a child friendly element of the Model Complaints Handling Procedure to make it simpler for children to make complaints. In a Council context, young people in care do have a named contact person to whom they can make complaints. In short, as work develops nationally, the Council will be able to adopt new standards of working in this area.</p> <p><b>Negatives</b></p> <p>Looked after and accommodated children or children in foster care may find it difficult to make a complaint. The work referenced above will hopefully make it easier for children to make complaints.</p> <p><b>Positives</b></p> <p>CEC staff have access to a range of information on complaints, either from the website, Orb, and online training material. CCMG members are also on hand to advise accordingly, and a Trauma Advisory Board (and associated training) has been established by CEC and NHS Lothian.</p> <p><b>Negatives</b></p> <p>Due to the potentially disturbing nature of some complaints, some compliant handlers may be subject to vicarious trauma.</p> <p>Lack of readily available information on complaints handling contacts within services could lead to a potential delay in forwarding complaints received</p> | <p><b>Young people and Children<br/>Care experienced young people<br/>Young people with disabilities<br/>Young people with long term health and Mental Health issues</b></p> <p><b>Staffing Groups</b></p> |
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| <p>centrally on to the appropriate officers. Directorate audit actions on this point will hopefully facilitate improvement.</p> |  |
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| <p><b>Environment and Sustainability including climate change emissions and impacts</b></p> <p><b>Positive</b></p> <p>Channel shift in the main from paper complaints cards and mailing to online and telephone provision helps to reduce the carbon footprint</p> <p><b>Negative</b></p> <p>A form of paper complaints card continues to be required for those who have difficulty making complaints in other ways.</p> | <p><b>Affected populations</b></p> <p><b>Older people, young people in care settings</b></p> <p><b>Minority ethnic groups</b></p> |
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| <p><b>Economic including socio-economic disadvantage</b></p> <p><b>Positive</b></p> <p>Our complaints Procedure is published on-line and divided into sections to promote greater accessibility and understanding.</p> <p><b>Negative</b></p> <p>The full complaints Policy is only published on-line; however, the basics of the policy are summarised on our complaints leaflet. This leaflet needs improved availability through community facilities and included in care packs to ensure all customers have good access to complaints information.</p> | <p><b>Affected populations</b></p> <p><b>All populations.</b></p> |
|---|---|

9. **Is any part of this policy/service to be carried out wholly or partly by contractors and if so how will equality, human rights including children’s rights, environmental and sustainability issues be addressed?**

No.

10. **Consider how you will communicate information about this policy/ service change to children and young people and those affected by sensory impairment, speech impairment, low level literacy or numeracy, learning difficulties or English as a second language? Please provide a summary of the communications plan.**

An annual communications plan will be developed through the Council’s Corporate Complaints Management Group (CCMG) meetings. The audit will aim to include elements of public engagement, including key audiences of children and adult service users, as well as approaches to reach audiences without on-line access. In addition, improvements in our website content will enhance access to our policy and complaints performance information.

11. **Is the policy likely to result in significant environmental effects, either positive or negative?** If yes, it is likely that a [Strategic Environmental Assessment \(SEA\)](#) will be required and the impacts identified in the IIA should be included in this.

No.

**12. Additional Information and Evidence Required**

**If further evidence is required, please note how it will be gathered. If appropriate, mark this report as interim and submit updated final report once further evidence has been gathered.**

The Panel did not consider that they required any further evidence to consider as part of the process.

13. **Specific to this IIA only, what recommended actions have been, or will be, undertaken and by when? (these should be drawn from 7 – 11 above) Please complete:**

| Specific actions (as a result of the IIA which may include financial implications, mitigating actions and risks of cumulative impacts) | Who will take them forward (name and job title) | Deadline for progressing | Review date |
|--|---|--------------------------|-------------|
|  |   |                          |             |

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| Revise website guidance to ensure sources of advocacy and support are clearly stated.                            | Kevin Wilbraham  | Mar 2023. |           |
| Issue communications to ensure appropriate levels of awareness around the policy.                                | Ronnie Henderson | Mar 2023. |           |
| Ensure there is oversight and monitoring of policy use to ensure appropriate levels of organisational awareness. | Kevin Wilbraham  | Mar 2023. |           |
| Update complaints leaflet / card and ensure this is made available in all Council offices and facilities.        | CCMG             | Mar 2024. | Mar 2023. |

**14. Are there any negative impacts in section 8 for which there are no identified mitigating actions?**

No.

**15. How will you monitor how this proposal affects different groups, including people with protected characteristics?**

The Council's Corporate Complaints Group can monitor policy use and application, with reporting to the Council's Strategic Complaints Group, if required.

**16. Sign off by Head of Service**

**Name: Nick Smith, Service Director for Legal & Assurance**

**Date: x**

**17. Publication**

Completed and signed IIAs should be sent to

[strategyandbusinessplanning@edinburgh.gov.uk](mailto:strategyandbusinessplanning@edinburgh.gov.uk) to be published on the IIA directory on the Council website [www.edinburgh.gov.uk/impactassessments](http://www.edinburgh.gov.uk/impactassessments)

**Edinburgh Integration Joint Board/Health and Social Care**

[sarah.bryson@edinburgh.gov.uk](mailto:sarah.bryson@edinburgh.gov.uk) to be published on the [www.edinburghhsc.scot/theijb/integrated-impact-assessments/](http://www.edinburghhsc.scot/theijb/integrated-impact-assessments/)