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	Issue No: 02
Equality Impact Assessment (EqIA)	Issue date: 09/08/2013
	Review date: 08/08/2016
	Originator: Carol Gillespie
	Authorised by: Jennifer Russell

It is important to note that not all policy, strategy or projects will require a full impact assessment to be carried out. In order to ascertain whether this is required or not please ensure that you have carried out an Initial Equality Impact Assessment. The following table provides further details on each of the protected characteristics and definitions of each strand.

Protected characteristic	Definition
Age	Protects people of all ages
Disability	Applies to a range of people that have a condition (physical or mental) which has a significant and long-term adverse effect on their ability to carry out 'normal' day-to-day activities. This protection also applies to people that have been diagnosed with a progressive illness such as HIV or cancer
Gender	Applies to male or female
Gender Reassignment	The definition of gender reassignment includes people who chose to live in the opposite gender to the gender assigned to them at birth removing the previously legal requirement for them to undergo medical supervision
Marriage or civil partnership (HR projects only)	The Act protects employees who are married or in a civil partnership against discrimination. Single people are not protected
Sexual Orientation	The Act protects lesbian, gay, bi-sexual and heterosexual people
Race	This includes colour, ethnic / national origin or nationality
Religion or Belief	The Act covers any religion, religious or non-religious beliefs. Also includes philosophical belief or non-belief
Pregnancy and Maternity	A woman is protected against discrimination on the grounds of pregnancy and maternity. With regard to employment, the woman is protected during the period of her pregnancy and any statutory maternity leave to which she is entitled

Name of Business Unit	Programme Management Office-Datasets Governance Project
Name/designation of person(s) responsible for managing/ conducting this policy, strategy or projects	Lindsay Hailes (Business Analyst)
Have you carried out an Initial Equality Impact Assessment?	Yes

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Name of Policy, Strategy or Project	Online Complaints Registration Form	
Is it (*delete as applicable)	*New	
Is responsibility for delivery shared with others? (*delete as applicable)	*No	
If yes, who are your partners?		

Which of the following equality areas are relevant to this policy, strategy or projects?			
Age	Yes	Sexual Orientation	Yes
Disability	Yes	Race	Yes
Gender	Yes	Religion or Belief	Yes
Gender Reassignment	Yes	Pregnancy and Maternity (HR projects only)	Yes
Marriage or Civil Partnership (HR projects only)	Yes		

Start Date	September 2014	Completion Date	
Approved by	JR	Date Approved	June 2014
Date sent to: <a href="mailto:equalities@sepa.org.uk">equalities@sepa.org.uk</a>		Signed:	
Date the Equality Impact Assessment was published		Signed:	

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1. Identify ALL the Aims of the policy, strategy or projects

1. What is the purpose of the policy, strategy or projects? (consider explicit and implicit aims)
2. Who does the policy, strategy or projects affect?
3. Who does the policy, strategy or projects benefit directly? (e.g. employees/service users; equality groups, other stakeholders)
4. What results/outcomes are intended?

1. The primary purpose of the Online Complaint Registration Form is:
  - To capture Service Complaints and Equalities screening information from both internal and external users through the SEPA website through a simple online form. This will ensure that complaints are captured and directed to the correct area within SEPA in the first instance. The form will capture information using, radial buttons, drop down boxes, free text sections and an interactive GIS based map.
2. The Online Complaints Registration Form may affect:
  - SEPA staff- SEPA staff will use the form to log details of complaints where appropriate.
  - Members of the public who wish to register a complaint with SEPA online.
3. The Online Complaints Form will directly benefit:
  - SEPA staff (all of those who may wish to register a complaint a complaint received and those members of staff involved in management and resolution of complaints).
  - Members of the public who wish to register a complaint with SEPA online
  - Organizations who wish to register a complaint with SEPA online.
4. The intended outcomes are:
  - Offer the opportunity for customers to register complaints online
  - Capture all necessary information within a standard format
  - Gather Equalities monitoring data in an anonymous manner
  - Direct complaints to the correct department within SEPA in the first instance

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2. Consider the Evidence (data and information)

1. What information or data would it be useful to have? What data (quantitative and qualitative) is available? (in-house/external)
2. How reliable/valid/up-to-date is it?
3. What information is available?
4. What does the data/information tell you about
  - Different needs?
  - Different experiences?
  - Different access to services, information or opportunities?
  - Different impacts/different outcomes?
5. Are there any gaps that you should fill now/later by further evidence gathering/commissioning or by secondary analysis of existing data? Are there any experts or stakeholders you should consult now? Have you consulted any experts already? What were their views?

Currently evidence regarding equalities is not gathered through the complaints process. The complaints handling process was updated in April 2014 and no data is available from this date.

- From 1<sup>st</sup> April 2013 to 31<sup>st</sup> March 2014 16 complaints were logged of which 3 were taken to stage 2
- From 1<sup>st</sup> April 2012 to 31<sup>st</sup> March 2013 22 complaints were logged of which 12 were taken to stage 2

See complaints handling process for explanation of stage 2 complaints

[http://stir-app-net05/Intranet/governance\\_portfolio/information\\_management/complaints/overview\\_of\\_process.aspx](http://stir-app-net05/Intranet/governance_portfolio/information_management/complaints/overview_of_process.aspx)

Evidence regarding equalities and impacted groups will be gathered continuously through use of the Equalities screening section of the Online Complaints Form. This data will be held separately from the details of the complaint in order to ensure anonymity and will be used to inform any future improvements in both the complaints process and the Online

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Complaints form. Evidence from the process will also help determine whether there are issues relating to the culture of the organization that need to be addressed through for example training and awareness

Currently evidence from the 2011 Scottish Census provides details on the demographic make up of the population of Scotland. Especially relevant is the fact that 7% of the Scottish population are from a minority ethnic group. In addition Scotland has an aging population and 19% of the population currently identify as having a disability or limiting illness. Although this method of capturing complaints is on line only and this affects these particular groups, it is supported by other means of lodging a complaint. Although SEPA users and staff will be indicative to some extent of that generic picture, without SEPA specific equality monitoring data, it is difficult to determine whether the methods of capturing complaints needs to change.

Source of Evidence – Scottish Census 2011 and SEPA Complaints data.

### 3. Assess the likely impact on different groups

1. Does your analysis of the evidence indicate any possible adverse impact on a particular group (age, disability, gender, transgender, sexual orientation, race, religion or belief, pregnancy or maternity and marriage or civil partnership)
2. If it is adverse, is it likely to be discriminatory?
3. In what areas does it have an impact? E.g. access to information, experience of services.
4. Even if there is no evidence of adverse impact, is there an opportunity to promote equality more effectively, or foster good relations between groups.

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1. Analysis of the evidence has identified a possible adverse impact on those individuals who may fall under the Race, Age or Disability protected characteristics.

Those people with visual impairments may be disproportionately impacted due to the nature of the product and those individuals who fall under the Race protected characteristic may have difficulty accessing information where English is not their first language, those who fall under the Age protected characteristic may have restricted access to the internet.

2. The impacts identified may be discriminatory if the user prefers to register their complaint online rather than using any other medium which may be available to them.

3. The Online Complaints Registration form may limit someone with protected characteristics accessing that service due to its nature, although this should not limit their ability to register a complaint using other channels.

4. There has been no direct opportunity to promote equality or foster good relations between groups identified by the publication of this information, although providing users the option to receive the complaints form in different formats will help to foster good relations.

5. Capturing data will contribute toward eliminating unlawful discrimination by identifying any issues that related to the protected characteristics and providing an opportunity to improve services.

4. Consider alternatives (what to do if you find adverse impact)

1. How can you change your proposal in a way that is proportionate, and will

- Remove discrimination?
- Reduce any adverse impact?
- Promote equality more effectively?

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- Foster good relations between groups?
2. If there are none, can the policy, strategy or projects still be justified?
  3. Can the aims be met in some other way? What can you do now/later?
  4. What are you recommending?

1. Several other channels are available for customers to register complaints where using an online form may not be appropriate. This includes: via e-mail, mail, phone or in person at any SEPA office. The Online Complaints Form will be used in conjunction with these methods to enhance access to the complaints process.  
At a corporate level the SEPA Communications Department are also working to put in place a process whereby all information published by SEPA can be translated on request which will remove discrimination against those under the protected characteristic of Race
2. As detailed above other means to allow access to the complaints process are already in place, the Online Complaints Registration form will be used in conjunction with these other methods in order to provide an additional route to register complaints and enhance rather than diminish the customer experience.
3. As above the Online Complaints Form can and will be used in conjunction with all other methods for registering a complaint, ensuring that all channels where a complaint may be registered remain in place will mitigate discrimination to those customers with protected characteristics.
4. Recommendation is that the Online Complaints Form is used to provide a channel for customers wishing to register a complaint online in conjunction with other methods.

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5. Consult formally (relevant stakeholders)

1. What are the views of the people who are likely to be affected or who have an interest about?
  - Whether you have identified the right issues?
  - Whether you have proposed suitable modifications?
  - Whether your proposals will meet their needs?
2. How will you consult?
3. Whom do you need to get views from?(internally/externally)
4. What methods will you use?
5. What formats will you use for communicating with different groups?

1. Issues have been identified and solutions proposed based on knowledge of equalities from SEPA staff, a training course on equalities legislation and previous experience of similar products.
2. Internal consultation has taken place with an equalities champion.
3. Feedback on SEPA online services may be gathered as part of other projects and programmes specifically related SEPA's website and digital services offered and may be gathered in several formats

6. Decide whether to adopt this policy, strategy or project- (consider these questions to prompt answers)

What were your findings from the consultation?

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Taking into account all of the data, information, potential impact issues and consultation feedback, what will you recommend?

- Stop and remove the policy, strategy or project
- No major change the policy, strategy or project is robust
- Modify the policy, strategy or project (Say how your changes will deal with adverse impacts) (consider if there are any new adverse impacts for any equality group)
- Adopt the policy, strategy or project as proposed. (You should justify this where you identified adverse impact, or where you are not incorporating feedback from your consultations)

Adopt the policy, strategy, or project as proposed.

- The Online Complaints Registration Form will offer an additional way for customers to contact SEPA to register a complaint, this will be in addition to customers being able to register complaints via: email, mail, phone and in person. All of these channels for registering a complaint should allow customers with and without protected characteristics to register a complaint in a way that they are comfortable with.

7. Make Monitoring (and review) Arrangements - (consider these questions to prompt answers)

1. How will you know what the actual effect of the policy, strategy or project is?
2. In what ways will you monitor? e.g. continuously or irregularly, quantitative methods such as surveys, qualitative methods such as interviews
3. How often will monitoring information be analysed (and published)?

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4. When will you review the policy, strategy or project taking into account any monitoring information?

1. The effect of the Online Complaints Registration form will be identified and analyzed in line with the complaints reporting process.
2. All complaints received in SEPA are routinely collated and analyzed for trend information to ensure that service failures are identified and appropriate action is taken.
3. SEPA publish the outcome of complaints and the actions taken on a quarterly basis as per the SEPA complaints handling procedure, data gathered from the Online Complaints registration form will form part of this reporting.
4. The Online Complaints Registration form will be regularly reviewed in line with identified service improvements

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