

## **Managing Customer Contact Policy**

### **Equality Impact Assessment Form**

See Equality Impact Assessment Policy and Procedure for detailed guidance on how to complete this form.

### Section 1: Purpose and scope of policy

|  |   |
|--|---|
| <b>Title</b>   | Managing Customer Contact Policy  |
| <b>New or existing</b>                                   | Existing  |
| <b>Owner</b>   | Jenny Strinati  |
| <b>Officer(s) undertaking the EIA</b>                    | Jenny Strinati<br>Tariq Khan<br>Ania Rolewska   |
| <b>What does the policy aim to achieve?</b>              | This policy sets out how contact with complainants may be managed in the very small number of cases where the actions or behaviour of a complainant challenges our ability to deliver an effective service to all |
| <b>How is the policy related to other areas of work?</b> | This policy is linked to the Equality Plan objectives, in that it relates to the accessibility of our complaint handling process.   |
| <b>Who is likely to be affected by this policy?</b>      | Service users<br>Casework staff interacting with service users  |

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## Section 2: Assessment of relevance and proportionality

Key points to remember:

- to assess relevance you must consider evidence related to all equality characteristics
- you must record all evidence considered in [section 4](#) of this form.

| Question  | No                                  | Yes                                 | Comments   |
|---|-------------------------------------|-------------------------------------|--|
| Does the policy relate to PSOW's equality objectives and identified actions?  | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | This policy is linked to the Equality Plan objectives, in that it relates to the accessibility of our complaint handling process.  |
| Does the policy relate to functions that evidence, or previous activities have identified as being important to, particular characteristics?                          | <input type="checkbox"/>            | <input type="checkbox"/>            | The policy relates to our complaint handling function. This function must be accessible to all service users. However, we are particularly aware of the need to ensure good access for people with disabilities / users of languages other than English and Welsh. |
| Does the policy relate to an area where there are known inequalities, or a significant potential for reducing inequalities or improving outcomes?                     | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |  |
| Is there evidence to suggest that this policy may affect:   |                                     |                                     |  |
| <ul style="list-style-type: none"> <li>• equal treatment of people with certain characteristics</li> </ul>  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |  |
| <ul style="list-style-type: none"> <li>• meeting the needs of people with equality characteristics (including through provision of reasonable adjustments)</li> </ul> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | Yes, possibly people whose challenging behaviour is linked to disability (.e.g mental health condition).   |
| <ul style="list-style-type: none"> <li>• participation of people with equality characteristics</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |  |
| <ul style="list-style-type: none"> <li>• community relations between different equality groups</li> </ul>   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |  |
| Is there evidence to suggest that this policy may influence disadvantage due to people's socio-economic status?   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |  |
| Is there evidence to suggest that this policy may affect opportunities for people to use Welsh or affect how PSOW treats the Welsh language?                          | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |  |

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If you answer 'yes' to any of these questions, proceed to [section 3](#).

If a policy is not deemed relevant for conducting a full EIA, proceed to [section 4](#).

### Section 3: Full Equality Impact Assessment

Key points to remember:

- you must consider at this stage any need for collection of further evidence - including through engagement with groups potentially affected by the policy;
- you must record all evidence informing this stage in [section 4](#) of this form.

## Equality Impact Assessment Form

| Characteristic  | Negative impact          |                          |                          | Positive impact          |                          |                                     | n/a                                 | Justification based on the evidence considered  | Proposed actions to mitigate negative impact /maximise positive impact  | Negative impact          |                          |                          | Positive impact          |                                     |                          |
|-----------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|-------------------------------------|---|---|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|
|                 | H                        | M                        | L                        | H                        | M                        | L                                   |                                     |   |   | H                        | M                        | L                        | H                        | M                                   | L                        |
| General aspects | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | The policy has a general positive equality impact in that it aims to protect our staff from discrimination.   | This impact is strengthened by addition of a bullet point which specifically forbids behaviours that discriminate based on protected characteristics, socio-economic status and the Welsh language. This impact would be set to 'high' if it wasn't for the fact that the policy is applied comparatively infrequently. | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| Age             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |   |   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |
| Disability      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> | <p>There is a potential risk that this policy will negatively impact people with some mental health conditions. However, the policy already contains safeguards to ensure that this does not happen. These include the following:</p> <ul style="list-style-type: none"> <li>the policy allows for multiple steps to be taken before implementing a restriction on contact</li> <li>referral of complex cases of challenging behaviour for consideration to our internal Equality and Human Rights Advice Group</li> <li>the policy includes an appeal mechanism</li> </ul> | n/a   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> |

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| Characteristic               | Negative impact          |                          |                          | Positive impact          |                          |                                     | n/a                                 | Justification based on the evidence considered   | Proposed actions to mitigate negative impact /maximise positive impact | Negative impact          |                          |                          | Positive impact          |                                     |                          |                          |
|------------------------------|--------------------------|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|-------------------------------------|--|--|--------------------------|--------------------------|--------------------------|--------------------------|-------------------------------------|--------------------------|--------------------------|
|                              | H                        | M                        | L                        | H                        | M                        | L                                   |                                     |  |  | H                        | M                        | L                        | H                        | M                                   | L                        |                          |
|                              |                          |                          |                          |                          |                          |                                     |                                     | More generally, the steps outlined in this policy are applied extremely infrequently (see evidence section). Overall, the above justifies identifying no negative impact on service users whose challenging behaviour may be linked to disability. |  |                          |                          |                          |                          |                                     |                          |                          |
| Gender                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |
| Gender reassignment          | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |
| Marriage & civil partnership | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |
| Pregnancy & maternity        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |
| Race                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |
| Religion or belief           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |
| Sexual orientation           | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |  |  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |
| Socio-economic status        | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | See above  |  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Welsh language               | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/>            | See above  |  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

## Section 4: Register of evidence and engagement

| Existing evidence considered      |  |
|-----------------------------------|--|
| <b>Equality screening</b>         |  |
| <b>Equality Impact Assessment</b> | <p>We use this policy very infrequently, maybe c.4 times a year. Even then, we might just use it as a warning of the need to modify behaviour. No one is on a restriction under the policy currently. Therefore, overall the impact of this policy on our service users is very limited. In addition, given the very small number of complainants involved, it is difficult to draw any more general conclusions about the profile of service users affected by this policy.</p> <p>In 2020/21, 26% of our complainants who responded to equality monitoring stated that they had a disability. 3% stated that they were from national background different than Welsh, English, Scottish or British (though over 7% chose not to answer this question).</p> |
| Additional evidence collected n/a |  |

# Equality Impact Assessment Form

## Section 5: Outcomes report

|  |                                     |                                     |                            |
|--|-------------------------------------|-------------------------------------|----------------------------|
| <b>EIA stage completed</b>   | Screening                           | <input checked="" type="checkbox"/> |                            |
|  | Impact assessment                   | <input checked="" type="checkbox"/> |                            |
| <b>Outcome of the EIA procedure</b>  | Proceed with policy – no changes    | <input checked="" type="checkbox"/> |                            |
|  | Make changes to policy              | <input type="checkbox"/>            |                            |
|  | Do not proceed with policy          | <input type="checkbox"/>            |                            |
| <b>Action plan (full EIA only)</b>   |                                     |                                     |                            |
| Where actions are required to mitigate the level of negative impact or maximise positive impact, please specify: |                                     |                                     |                            |
| <b>Key issue</b>   | <b>Action to be taken</b>           | <b>Responsible officer</b>          | <b>Date for completion</b> |
|  |                                     |                                     |                            |
| <b>Monitoring (full EIA only)</b>  |                                     |                                     |                            |
| <b>Please outline monitoring arrangements</b>  |                                     |                                     |                            |
| <b>Please specify responsible officer</b>  |                                     |                                     |                            |
| <b>Publication needs (full EIA only)</b>   |                                     |                                     |                            |
| Was the impact deemed as substantial (high)?   | NO                                  |                                     |                            |
| Authorised by the MT   | <input checked="" type="checkbox"/> |                                     |                            |
| Date   | 14/12/2021                          |                                     |                            |