



EQUALITY IMPACT ASSESSMENT (EqIA)

Summary results of the EqIA

Title of policy/practice/process/service:

Customer Service Policy.

Is the policy new (proposed), a revision to an existing policy or a review of current policy?

New.

Key findings from this assessment (or reason why an EqIA is not required):

The policy is a high level statement of general expectations of service delivery and is supported by a number of specific policies and duties that have been subject to separate equalities impact assessments.

Although the policy itself has no direct impact, its role as a set of “umbrella” principles will have an overall positive impact.

Summary of actions taken because of this assessment:

Existing supporting policies will have an explicit link to the Customer Service Policy.

Ongoing actions beyond implementation include:

The supporting policies will be reviewed if the implementation of the principles of the Customer Service Policy flags any operational issues that might require changes to those supporting policies and vice-versa.

Lead person(s) for this assessment (job title and department only):

Corporate Governance and Policy Officer.

Senior responsible owner agreement that the policy has been fully assessed against the needs of the general duty (job title only):

Corporate Support Manager.

Publication date (for completion by Communications):

07/11/2022

Document control		
Document control:	V0.4	
Date policy live from:	November 2022	
Review/ Approval Group:	CEO and Equalities teams	
Last reviewed:	12 October 2022	
Review cycle:	3 years	
Document change log		
Version/ Author	Date	Comment
V0.1	1 September	
V0.2	20 September	Reviewed by Corporate Support Manager prior to sending to Equalities Officer for comment.
V0.3	07 October	Further clarification and edits after feedback from Equalities Officer and Executive Team.
V0.4	12 October	Further review and approval by Corporate Support Manager to be sent to CE
Final	1 November	Chief Executive approved final version for publication.

Step 1 - Framing the planned change

Discussing step 1 and step 2 with the Policy Officer (Equalities) at an early stage will help identify appropriate evidence. This may include support from the wider Policy and Development team.

1.1 Briefly describe the aims, objectives and purpose of the policy/practice/process/service. You can use the information in your project specification, business case etc.

The aim of the policy is to clearly articulate expectations in the way that we interact with people and how people interact with us.

It aims to increase the transparency of our performance in this area, better align our service delivery with our values and better enable customers to hold us to account.

The policy aims to increase the likelihood that any failings in our service are highlighted and put right.

1.2 Customer service, and this policy itself, is a key thread of our Corporate Plan. Why is the change required? Legislative, routine review etc.

We are a public body and strive for good levels of customer service. Our service in certain areas is regulated by the Scottish Public Services Ombudsman (SPSO) who takes its authority from the Scottish Public Services Ombudsman Act 2002. For example our Complaints Handling Procedure must follow the model prescribed by the SPSO.

We do not currently have a document that clearly brings together what customers can expect from us, what we expect from our customers, and how our performance on customer services is managed and reported. This means that, although standards of service may be good, there can be a fragmented approach to customer service and behaviour of our customers across the organisation.

1.3 Who is affected by this policy/practice/process/service? Be clear about who the 'customer' is.

SLAB staff, applicants, opponents, other members of the general public and (indirectly) solicitors, as well as opponents and other interested parties in the case. A policy should facilitate predictability and consistency for people in their interactions with SLAB whilst providing SLAB staff with greater clarity on what they need to do and what they can expect from those they interact with.

1.4 Policy/practice/process/service implementation date? *Project end date, date new legislation will take effect.*

01/11/2022

1.5 What other SLAB policies or projects may be linked to or affected by changes to this policy/practice/process/service?

The policy is a set of high-level statements of general expectations of service delivery and is supported by a number of specific policies and duties that have been subject to separate equalities impact assessments.

Specific policies that support the Customer Services Policy are the Complaints Handling Procedure and the Unacceptable Behaviour Policy.

Our public sector equalities duties (PSED) and associated policies on communications are linked.

Other linked work includes improvements to template letters and other written correspondence with assisted persons/ applicants, opponents and other interested parties in the case, as well as early stage work in relation to an [interpreting service](#) which forms part of a [central government framework](#). A suite of [accessibility](#) and [language](#) options are available through SLAB's website.

Step 2: Consider the available evidence and data relevant to your policy/practice/process/service

The information you gather in this section will:

- help you to understand the importance of your policy/practice/process/service for different equality groups,
- inform the depth of equality impact assessment you need to do (this should be proportional to the potential impact on equality groups), and
- provide justification and an audit trail behind your decisions, including where it is agreed an equality impact assessment is not required.

2.1 What information is available about the experience of each equality group in relation to this policy/practice/process/service?

Stay focused on the topic and scope of your policy/practice/process/service. Does the policy/practice/process/service relate to an area where there are already known inequalities? Refer to the EqlA guidance for sources of evidence.

Remember, this step in the EqlA process is NOT about the impact your policy has on equality groups and what we need to do to mitigate those. That assessment is done under Step 4.

Note: If you proceed to a full EqlA you should continue to add to this section as you develop the policy/practice/process/service, come across new evidence and/or undertake a consultation.

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
Age	EqlA's for complaints policy , unacceptable behaviour policy and system letters .	The supporting policies and duties that sit under the umbrella of the charter have identified a number of issues and have been developed to take account of those. These policies and practices - and any subsequent ones developed as part of departmental implementation of the elements of the charter - either have or will have equalities impact assessments.
Disability		As above.

Equality characteristics	Evidence source (web link, report, survey, complaint)	What does the evidence tell you about the experiences of this group in relation to the policy/practice/process/service? <i>Lack of evidence may suggest a gap in knowledge/need for consultation (step 3).</i>
Race		As above.
Sex		As above.
Gender Reassignment		As above.
Sexual orientation		As above.
Religion or Belief		As above.
Pregnancy or maternity		As above.
Marriage/civil partnership		As above.
Care Experienced <i>(corporate parenting duty)</i>		As above.

2.2 Using the information above and your knowledge of the policy/practice/process/service, summarise your overall assessment of how important and relevant the policy/practice/process/service is likely to be for equality groups.

The policy is of relevance to all protected characteristics and care experienced people. It will facilitate predictability and consistency for people in their interactions with SLAB whilst providing SLAB staff with greater clarity on what they need to do and what they can expect from those they interact with. The policy itself as a set of “umbrella” principles will have an overall positive impact.

2.3 Outcome of step 2 and next steps. Complete the table below to inform the next stage of the EqIA process.

Consult with the project group and/or Corporate Policy Officer (Equalities) on completing this section.

Outcome of Step 2 following initial evidence gathering and relevance to equality characteristics	Yes/ No (Y or N)	Next steps
There is no relevance to equality or our corporate parenting duties		Proceed to Step 5: agree with decision makers that no EqIA is required based on current evidence
There is relevance to some or all of the equality groups and/or our corporate parenting duties	Y	Proceed to Step 3: complete full EqIA
It is unclear if there is relevance to some or all of the equality groups and/or our corporate parenting duties		Proceed to Step 3: complete full EqIA

Step 3 - stakeholder involvement and consultation

This step will help you to address any gaps in evidence identified in Step 2. Speaking to people who will be affected by your policy/practice/process/service can help clarify the impact it will have on different equality groups.

Remember that sufficient evidence is required for you to show ‘due regard’ to the likely or actual impact of your policy/practice/process/service on equality groups. An inadequate analysis in an assessment may mean failure to meet the general duty.

The Policy and Development team can help to identify appropriate ways to engage with external groups or to undertake research to fill evidence gaps.

3.1 Do you/did you have any consultation or involvement planned for this policy/practice/process service?

Yes

3.2 List all the stakeholder groups that you will talk to about this policy/practice/process/service.

The Directors of Operations and Corporate Services. Key managers within those directorates and the Executive Team.

3.3 What did you learn from the consultation/involvement? Remember to record relevant actions in the assessment action log.

Consultees were supportive of the policy.

Step 4 - Impact on equality groups and steps to address these

You must consider the three aims of the general duty for each protected characteristic. The following questions will help:

- Is there potential for discrimination, victimisation, harassment or other unlawful conduct that is prohibited under the Equality Act 2010? *How will this be mitigated?*
- Is there potential to advance equality of opportunity between people who share a characteristic and those who do not? *How can this be achieved?*
- Is there potential for developing good relations between people who share a relevant protected characteristic and those who do not? *How can this be achieved?*

4.1 Does the policy/practice/process/service have any impacts (whether intended or unintended, positive or negative) on any of the equality characteristics?

In the tables below, record the impact the policy/practice/process/service might have on each equality characteristic, as it is planned or as it operates, and describe what changes in policy/practice process/service or actions will be required to mitigate that impact. Copy any actions across to the project action log.

Age, Sex, Disability, Gender reassignment, Race, Religion or Belief, Sexual Orientation, Pregnancy & Maternity, Marriage & Civil Partnership, Care experienced young people	Place 'X' in the relevant box(es)			Describe the changes or actions (if any) you plan to take. For example, to mitigate any impact, maximise the positive impact, or record your justification to not make changes despite the potential for adverse impact.
	Positive impacts	Negative impacts	No impact	
potential for discrimination	X			The potential for discrimination will be reduced as the policy provides an accessible portal connecting people with the practical policies that have been tailored to reduce the likelihood of discrimination. It is a clear statement of intention and allows people to understand quickly the level of service to expect and the expectations of their behaviour

				without needing to become familiar with the more complex and detailed underlying policies.
potential for developing good relations	X			By clearly stating expectations of service and behaviour in an accessible format it should reduce the scope for misunderstanding and accordingly improve the development and management of good relations between staff and customers.
potential to advance equality of opportunity	X			The policy provides a bridge from detailed, complex policies that in themselves have the potential to advance equality of opportunity and easy to understand statements supported by those policies.

4.2 Describe how the assessment so far might affect other areas of this policy/practice/process/service and/or project timeline?

N/A.

4.3 Having considered the potential or actual impacts of your policy/practice/process/service on equality groups, you should now record the outcome of this assessment below. Choose from one of the following (mark with an X or delete as appropriate):

Please select (X)	Implications for the policy/practice/process/service
	<p>No major change Your assessment demonstrates that the policy/practice/process/service is robust. The evidence shows no potential for unlawful discrimination and that you have taken all opportunities to advance equality of opportunity and foster good relations, subject to continuing monitoring and review.</p>
X	<p>Adjust the policy/practice/process/service You need to take steps to remove any barriers, to better advance equality of to foster good relations. You have set actions to address this and have clear ways of monitoring the impact of the policy/practice/process/service when implemented.</p>

	<p>Continue the policy/practice/process/service with adverse impact</p> <p>The policy/practice/process/service will continue despite the potential for adverse impact. You have justified this with this assessment and shown how this decision is compatible with our obligations under the public sector equality duty. When you believe any discrimination can be objectively justified you must record in this assessment what this is and how the decision was reached.</p>
	<p>Stop and remove the policy/practice/process/service</p> <p>The policy/practice/process/service will not be implemented due to adverse effects that are not justified and cannot be mitigated.</p>

Step 5 - Discuss and review the assessment with decision makers and governance structures

You must discuss the findings of this assessment with senior decision makers during the lifetime of the project/review and before you finalise the assessment. Relevant groups include, but are not limited to, a Project Board, Executive Team or Board members. EqlA should be on every project board agenda therefore only note dates where key decisions have been made (for example draft EqlA sign off, discussion about consultation response).

5.1 Record details of the groups you report to about this policy/practice/process/service and impact assessment. Include the date you presented progress to each group and an extract from the minutes to reflect the discussion.

The draft policy was shared with the Executive Team on 29 September 2022, where it was supported.

Step 6 - Post-implementation actions and monitoring impact

There may be further actions or changes planned after the policy/practice/process/service is implemented and this assessment is signed off. It is important to continue to monitor the impact of your policy/practice/process/service on equality groups to ensure that your actual or likely impacts are those you recorded. This will also highlight any unforeseen impacts.

6.1 Record any ongoing actions below.

This can be copied from the project action log or elsewhere in this assessment and should include timescales and person/team responsible. If there are no outstanding items please make this clear.

No further action required.

6.2 Note here how you intend to monitor the impact of this policy/practice/process/service on equality groups. In the table below you should:

- *list the relevant measures,*
- *identify who or which team is responsible for implementing or monitoring any changes,*
- *identify where the measure will be reported to ensure any issues can be acted on as appropriate.*

Measure	Lead department/ individual	Reporting (where/ frequency)
Data on requests for communication support needs as part of the CHP	CEO	Annually

6.3 EqlA review date.

This EqlA should be reviewed as part of the post-implementation review of the policy/practice/process/service. The date should not exceed three years from the policy/practice/process/service implementation date.

01/11/2023

Step 7 - Assessment sign off and approval

Once final consultation has been undertaken with Corporate Policy Officer (Equalities), all equality impact assessments must be signed off by the relevant Director or Senior Responsible Owner (SRO), even where an EqIA is not required. The Chief Executive must approve all equality impact assessments. Note the relevant dates here:

Director/SRO sign off: 01/11/2022

Chief Executive approval: 01/11/2022

All full equality impact assessments must be published on SLAB's website as early as possible after the decision is made to implement the policy, practice, process or service.