



Social Security Scotland
Tèarainteachd Shòisealta Alba

Equality Impact – Assessment Record

Complaints Handling Procedure

Aim

Complaints give us valuable information we can use to improve client satisfaction. Our complaints handling procedure will enable us to address a client's dissatisfaction and may also prevent the same problems that led to the complaint from happening again.

This procedure introduces a standardised approach to handling complaints across Social Security Scotland, which complies with the [Scottish Public Services Ombudsman's guidance on a model complaints handling procedure](#).

This contributes to the strategic objective in our [Corporate Plan](#) where we commit to:

- Gather feedback on what people think of our service so we can make it better.

Our complaints handling procedure will enable us to address a client's dissatisfaction and may also prevent the same problems that led to the complaint from happening again. For our staff, complaints provide a first-hand account of the client's views and experience, and can highlight problems we may otherwise miss. Handled well, complaints can give our clients a form of redress when things go wrong, and can also help us continuously improve our services.

The complaints handling procedure will help us keep the client at the heart of the process, while enabling us to better understand how to improve our services by learning from.

All of our clients will be impacted by this procedure and a clear, inclusive complaints process will ensure that we obtain feedback from our clients in order to improve our services.

Workshops

The policy document and the front facing part 5 detailing the process for our clients was circulated around a group comprising of colleagues from Local Delivery, Client Experience, Inclusive Communications and Corporate governance colleagues.

Framing exercise found that the initial wording was too complex. Amendments suggested as a result of this workshop on

- getting help to support making complaints
- emphasise that we accept complaints anonymously
- accessibility (easy read)
- highlighting face to face complaint method with local delivery
- use of flow charts and icons to make things easier to show the flow of the process
- Improvements to the section on what can and cannot be complained about to make this easier to understand
- Increased emphasis on encouraging complaints to improve our services

Data and evidence gathering, involvement and consultation

The policy document and the front facing Part Five detailing the process for our clients was amended, circulated around the same group of colleagues from Local Delivery, Client Experience, Inclusive Communications and Corporate governance colleagues and also to an external third party organisation, Glasgow Disability Alliance.

As the procedure is prescribed to us by Scottish Public Services Ombudsman, the improvements suggested related mainly on how we communicate the procedure to our clients.

As a result of the Equality Impact Assessment workshops the following improvements were suggested:

- Document should encourage complaints and highlight how easy it is to make a complaint
- Language simplified and first person used throughout for consistency
- Communications on the Complaints Handling Procedure should be in different formats, including written leaflets (in other languages) easy read and video formats
- Emphasise that complaints may help others/improve our service
- Clarification on who can complain and what is required for a third party to complain

- Increased information on what support is available to make a complaint
- Highlight the different methods we have of communicating with clients and the methods used to make a complaint
- Highlight that anonymous complaints can be taken and when these may be appropriate
- Provide more detail on what can be claimed about (using our new categories for complaints)
- Be clearer on when complaints can be taken
- Use complaint examples to reflect protected characteristics to encourage and demonstrate the inclusivity of the process
- Use of a flow chart and icons to visually demonstrate the complaints procedure

The above improvements have now been incorporated into the [Complaints Handling Procedure](#) Part 5 communication for our clients.

Assessing the impacts and identifying opportunities to promote equality

The [Complaints Handling Procedure](#) has a positive impact on people across the protected characteristics.

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation
- Care experienced

The Complaints Handling Procedure is defined by Scottish Public Services Ombudsman. It provides a consistent approach to ensure complaints are dealt with in an efficient and timely manner. The procedure provides a variety of different ways in which complaints can be made to ensure this is as easy as possible for all of our clients. This includes:

- Telephony
- Web chat
- Face to face
- Email
- Letter
- Social Media

Information is provided in our public facing communications on where to go for further support and the variety of formats which can be used within the procedure to communicate with our clients. This, along with the improvements suggested and implemented from the workshops, will further provide assurance that the procedure is inclusive and accessible.

Further to this, we are looking at additional products to publicise the [Complaints Handling Procedure](#), and encourage feedback in easy read format, videos and hard copy printed posters.

Decision making

The activity is not directly or indirectly discriminatory under the Equality Act 2010.

The Equality Impact Assessment identified a gap in the collection of any data on users of our complaints system. Scottish Public Services Ombudsman recommends that qualitative reports be published on complaint handling satisfaction rates

No analysis has been possible to enable any work to be done on analysing who is using the complaints system or how effective it is in meeting their needs.

Monitoring and Review

The [Complaints Handling Procedure](#) is reviewed when Scottish Public Services Ombudsman makes any changes to their guidance for all Scottish public bodies.

There is work being undertaken to put in place a system to collect data on the users of our complaints system. This will include the timeframe for the collection and agreed reporting structure on any survey or data collected.

Two questions have now been added to the [Client Survey for 2021](#) to seek some feedback from any clients who have made a complaint to Social Security Scotland.

Given the low numbers of complaints and the return rate for surveys, we may not gain sufficient information to form any valid analysis from this exercise.

We are considering a survey of all clients who use the system at the point where their complaint is resolved, to gain further insight into the inclusiveness and ease of use of the policy. Once this is in place a review of the communication of this policy and how it is operating will take place.

Authorisation of Equality Impact Assessment

Please confirm that:

- This Equality Impact Assessment has informed the development of this activity:
Yes No
- Opportunities to promote equality in respect of age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation and care experience have been considered, i.e.:
 - Eliminating unlawful discrimination, harassment, victimisation;
 - Removing or minimising any barriers and/or disadvantages;
 - Taking steps which assist with promoting equality and meeting people's different needs;
 - Encouraging participation (e.g. in public life)
 - Fostering good relations, tackling prejudice and promoting understanding.Yes No
- If the Marriage and Civil Partnership protected characteristic applies to this activity, the Equality Impact Assessment has also assessed against the duty to eliminate unlawful discrimination, harassment and victimisation in respect of this protected characteristic:
Yes No Not applicable

Declaration

I am satisfied with the equality impact assessment that has been undertaken for the Complaints Handling Procedure and give my authorisation for the results of this assessment to be published on Social Security Scotland's website.

Name: Janet Richardson

Position: Deputy Director

Authorisation date: 28 September 2022

Once complete please send completed record:

Corporateassuranceteam@socialsecurity.gov.scot