

# Equality Impact Assessment / Equality Analysis

(Version 4)

Item name	Details
<b>Title of service or policy</b>	Adult Social Care Services Complaints and Feedback Policy and Procedure
<b>Name of directorate and service</b>	One West, Complaints and Data Protection Team
<b>Name and role of officers completing the EqIA</b>	Sarah Watts, Complaints and Data Protection Team Manager
<b>Date of assessment</b>	January 2026

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on people and different groups within our community. The main aim is to identify any adverse impacts (i.e. discriminatory or negative consequences for a particular group or sector of the community, and to identify areas where equality can be better promoted). Equality impact Assessments (EqIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EqIA) or Equality Analysis. **Not all sections will be relevant – so mark N/A any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website following relevant service lead approval.

## 1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
1.1 Briefly describe purpose of the service/policy e.g. <ul style="list-style-type: none"><li>• How the service/policy is delivered and by whom</li><li>• If responsibility for its implementation is shared with other departments or organisations</li><li>• Intended outcomes</li></ul>	<p>The Council has a duty to handle complaints and related feedback in line with The Local Authority Social Services and NHS complaints (England) Regulations 2009 and The Local Authority Social Services and NHS Complaints (England) Amendment regulations 2009</p> <p>The Adult Social Care Service Complaints and Feedback policy sets out how feedback, including complaints and compliments, will be received, recorded and responded to ensure service failures are identified and put right when they have gone wrong for the individual and ensure the outcome is used for continuing improvement and development of service delivery.</p> <p>The Complaints and Data Protection Team Manager based in One West (Information Assurance) is responsible for the implementation of the policy and procedure; however, Adult Social Care managers work with the Complaints Manager to ensure complaints are investigated and responded to in a timely way and they are responsible for identifying and implementing the learning derived from complaints.</p>

<p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> <li>● Is it a new service/policy or review of an existing one?</li> <li>● Is it a national requirement?).</li> <li>● How much room for review is there?</li> </ul>	<p>It is a requirement for the Council to have a procedure in place to handle complaints about Adult Social Care which is managed in line with the Regulations. The procedure has been in place since 2009.</p> <p>A review of the procedure was undertaken in April 2024 when services previously provided by HCRG Care Group were insourced into the Council. The Council reverted to managing all complaints about Adult Social Care and reviewed the procedure to ensure it was being implemented in line with the Regulations and guidance provided by the Local Government and Social Care Ombudsman.</p>
<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>The procedure links with the Council's Corporate Complaints and Feedback Policy and the Children's Social Care statutory complaints procedure to ensure all expressions of dissatisfaction from residents of Bath and North East Somerset are dealt with in line with the appropriate complaints procedure.</p> <p>The Council will treat all information received in relation to complaints in accordance with the Council policies relating to GDPR and the Data Protection Act 2018.</p>

## 2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<p><b>2.1</b> What equality focussed training have staff received to enable them to understand the needs of our diverse community?</p>	<p>Members of staff in the Complaints and Data Protection Team update their Equality, Diversity and Inclusion training on an annual basis. The author of this report has also completed the Equalities Training for the Adults' and Children's workforce in 2025.</p>
<p><b>2.2</b> What is the equality profile of service users?</p>	<p>The Adult Social Care Complaints Procedure is available to all adults with care and support needs and their carers and anyone who has requested a service.</p>

	<p>Information is available on the B&amp;NES Strategic Evidence Base  <a href="https://www.bathnes.gov.uk/strategic-evidence">https://www.bathnes.gov.uk/strategic-evidence</a></p> <p>The number of complaints received on an annual basis is available in the Complaints and Feedback Annual Report.</p>
<b>2.3</b> Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	No customer satisfaction surveys have been carried out in recent years. Experience has shown that it is difficult for respondents to differentiate between their satisfaction with the complaints process and the outcome of their complaint.
<b>2.4</b> What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	Engagement has taken place with manager in Adult Social Care services.
<b>2.5</b> If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equality considerations within this?	There is no consultation planned for the near future.

### 3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equality groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what
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		<b>steps have been or could be taken to address this</b>
<b>3.1 Issues relating to all groups and protected characteristics</b>	When submitting a complaint, complainants are given the opportunity to identify any support or reasonable adjustments they need in order to access the procedure and successfully pursue their complaint.	The failure to capture information about protected characteristics is limiting the information available to the service and complaints team about which equalities groups are potentially unable to access the complaints procedure.
	The online form on the Council website does not currently capture information about protected characteristics.	This is currently being addressed in a review of the online form which will be updated and relaunched by 1 <sup>st</sup> April 2026.
<b>3.2 Sex</b> – identify the impact/potential impact of the policy on women and men.	The complaints procedure is available to all adults with care and support needs and their carers, and anyone who has requested a service.	No adverse impact for men or women has been identified.
<b>3.3 Pregnancy and maternity</b>	The complaints procedure is available to all adults with care and support needs and their carers, and anyone who has requested a service.	No adverse impact has been identified in relation to pregnancy or maternity.
<b>3.4 Gender reassignment</b> – identify the impact/potential impact of the policy on transgender people	The complaints procedure is available to all adults with care and support needs and their carers, and anyone who has requested a service.	No adverse impact has been identified for transgender people.
<b>3.5 Disability</b> – identify the impact/potential impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences)	The complaints procedure is available to all adults with care and support needs and their carers, and anyone who has requested a service.  Disabled people are encouraged to speak to the Complaints Team if they need any reasonable adjustment.	Due to a physical, sensory or mental health needs/differences, it can be difficult to navigate the complaints procedure, especially when emotions are heightened.  The Complaints Team will make a referral to the advocacy service where someone requests additional support to

		make their complaint. The Team will also speak with the service to understand how best to support the complainant.
<b>3.6 Age</b> – identify the impact/potential impact of the policy on different age groups	The complaints procedure is available to all adults with care and support needs and their carers, and anyone who has requested a service.	Many older adults have someone who will make a complaint on their behalf but where that is not the case and pursuing a complaint will be difficult due to a physical, sensory or mental health need, the Complaints Team will make a referral to the advocacy service on their behalf and will speak with the relevant service to understand how best to support the complainant.
<b>3.7 Race</b> – identify the impact/potential impact on across different ethnic groups	The complaints procedure is available to all adults with care and support needs and their carers, and anyone who has requested a service.	No adverse impact has been identified. Translation services are used where a need has been identified.
<b>3.8 Sexual orientation</b> – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual, questioning people	The complaints procedure is available to all adults with care and support needs and their carers, and anyone who has requested a service.	No adverse impact has been identified in relation sexual orientation.
<b>3.9 Marriage and civil partnership</b> – does the policy/strategy treat married and civil partnered people equally?	The complaints procedure is available to all adults with care and support needs and their carers, and anyone who has requested a service.	No adverse impact has been identified in relation to marriage and civil partnership.
<b>3.10 Religion/belief</b> – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	The complaints procedure is available to all adults with care and support needs and their carers, and anyone who has requested a service.	No adverse impact has been identified in relation to religion or belief.
<b>3.11 Socio-economically disadvantaged*</b> – identify the impact on	The complaints procedure is available to all adults with care and support needs	No adverse impact has been identified.

<p>people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances <b>(this is not a legal requirement, but is a local priority).</b></p>	<p>and their carers, and anyone who has requested a service.</p>	
<p><b>3.12 Rural communities*</b> identify the impact / potential impact on people living in rural communities</p>	<p>The complaints procedure is available to all adults with care and support needs and their carers, and anyone who has requested a service.</p>	<p>No adverse impact has been identified.</p>
<p><b>3.13 Armed Forces Community **</b> serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>	<p>The complaints procedure is available to all adults with care and support needs and their carers, and anyone who has requested a service.</p>	<p>No adverse impact has been identified.</p>
<p><b>3.14 Care Experienced ***</b> This working definition is currently under review and therefore subject to change:  In B&amp;NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential, foster care,</p>	<p>The complaints procedure is available to all adults with care and support needs and their carers, and anyone who has requested a service.</p> <p>The Complaints Team also manages complaints about Children's Services and has a good knowledge of support available to people who are care</p>	<p>No adverse impact has been identified.</p>

kinship care, or a special guardianship arrangement.	experienced who wish to pursue a complaint.	
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\*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

\*\* The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

\*\*\*The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

## 4. Bath and North East Somerset Council Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
For the online complaint form on the Council website to capture information about protected characteristics.	To work with IT to update the current online form and database.	Draft wording prepared.	David Langman, Customer Feedback and	1 <sup>st</sup> April 2026

			Standards Manager	

## 5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equality Team ([equality@bathnes.gov.uk](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's website. Keep a copy for your own records.

**Signed off by:** Rob Long – Head of Information Assurance (Divisional Director or nominated senior officer)



**Date:** 8<sup>th</sup> January 2026