

Full Equality Impact Assessment (EqIA)

Skills Development Scotland has a legal duty to consider the impact of any new ‘policy’ on equality groups. A ‘policy’ in this context is taken to mean any new activity, function, policy or product, essentially anything that SDS does. Assessing impact includes considering relevant evidence, including evidence received from equality groups and the likelihood of a positive or negative impact on equality groups of introducing that new product, project or policy. The final section of this form requires us to think about how negative consequences can be mitigated against or removed, and how potential positive impacts can be encouraged.

Equality impact assessment helps SDS meet its obligations under the Equality Act 2010. In addition, SDS took the decision to use the impact assessment process to make progress as a Corporate Parent in relation to care experienced young people, which is a component part of the Children and Young People (Scotland) Act 2014. The process might also be used to consider other groups that SDS has evidence of experiencing discrimination or underrepresentation.

For more detailed information about equality impact assessment, please see EHRC guidance here:

<https://www.equalityhumanrights.com/en/publication-download/assessing-impact-and-public-sector-equality-duty-guide-public-authorities>

Name of Equality Impact Assessment	Complaints handling procedure
Senior Responsible Officer (SRO)	Stewart Forrest

Approved by:	Director of:	Date approved:	Review date:
George Boag	Digital Services	7/4/21	

1. Purpose of policy

The purpose is to provide our customers with an accessible 'self-serve' process. This document will consider our current activity and how we can improve the experience for all our customers in the future.

2. Evidence and Impact

General equality considerations for all groups

2.1 Age

We provide an all-age service to individuals in Scotland. The current complaints procedure ensures that customers can contact us in several ways: in writing, by telephone, by email – this should ensure that barriers of age are addressed. Younger customers may require assistance from a parent or other adult to make a complaint – this is outlined in our complaints procedure. Some older customers who may be without access to the internet can call or send their complaint by post.

Evidence of positive or negative impact	Source of evidence	Context / activity to date	Further activity / enhancements to services required
Customers of different ages may have different communication styles.	SDS's Equality Evidence Review	Customers can access the customer complaints procedure in a number of formats written, phone, email, in person to ensure customers of all ages can access the service.	

2.2 Disability and additional support needs

[One Scotland](#) estimate that around one fifth of the Scottish population are disabled, with only 50% of those who are of working age in employment, compared to 80% of the overall population. According to [Scottish Pupil Census data](#) for 2017, around 29% of pupils on the school roll were recorded as having additional support needs. SDS is an 'appropriate agency' under the Education (Additional Support for Learning) (Scotland) Act, with duties to support the post-school transitions of pupils with additional support needs. The complaints procedure is accessible to disabled customers is written in Plain English and the online version is WCAG 2.1 AA compliant. The complaints procedure can be made available in other formats (e.g. Braille, easy read)

Evidence of positive or negative impact	Source of evidence	Context / activity to date	Further activity / enhancements to services required
Disabled/asn customers may have different communication styles or need accessibility support to use some forms of communication, including telephony and digital. This includes those with hearing loss, autism and speech, language and communication needs.	SDS's Equality Evidence Review	Customers can access the customer complaints procedure in a number of formats written, phone, email, in person to ensure customers can access the service	

2.3 Gender reassignment (sometimes under heading of Transgender)

In relation to their guidance, Supporting Transgender Young People, [LGBT Youth Scotland](#) highlight that more young people feel confident to come out to their friends and families as transgender at a younger age.

After consideration, due to no requirement to identify birth gender or require use of preferred pronouns it has been determined that there is no additional requirements at this time to address an individual's experience of using our complaints procedure.

Trans people, of all ages, face a high level of discrimination in society and the workplace. Identifying or 'coming out' as trans can be a risk and create anxiety. Everyone in an individual's life may not be aware they are trans, including those living at home.	SDS's Equality Evidence Review		
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2.4 Marriage and civil partnership

After consideration, it has been determined that this is not a factor that would negatively impact an individual's experience of using our complaints procedure.

2.5 Pregnancy and maternity

Because the complaints procedure is online and can be completed at any time anywhere the policy should be accessible and not adversely disadvantage this protected characteristic group.

2.6 Race

Race inequality persists and there is potential for this to increase due to COVID 19.

It is known that young people from Gypsy/Traveller communities and asylum seekers/refugees are more likely to be unemployed and as such are allocated a maximum level of support within our school and Next Steps service offers.

Evidence of positive or negative impact	Source of evidence	Context / activity to date	Further activity / enhancements to services required
<p>Refugees and asylum seekers are potentially some of the most isolated individuals during this current situation. They may be without services that would usually support them to navigate their new communities. They may require information in their own language and be unaware of support available. Other ethnic minority groups may also be isolated in the current circumstances due a lack of English language skills.</p>	<p>SDS's Equality Evidence Review</p>	<p>Because the complaints procedure is online and can be completed at any time anywhere the policy is widely accessible.</p>	

2.7 Religion or belief

Because the complaints procedure is online and can be completed at any time anywhere the policy should be accessible and not adversely disadvantage this protected characteristic group.

2.8 Sex (or gender)

Gender inequality persists in the workplace and there is potential for this to increase due to COVID 19. Because the complaints procedure is online and can be completed at any time anywhere the policy should be accessible and not adversely disadvantage this protected characteristic group.

2.9 Sexual orientation

Because the complaints procedure is online and can be completed at any time anywhere the policy should be accessible and not adversely disadvantage this protected characteristic group.

3. Assessing impact on other groups

3.1 Care experience

In recognition of our role as a corporate parent, care experienced individuals are a key group for consideration in the development and delivery of our services.

Because the complaints procedure is online and can be completed at any time anywhere the policy is widely accessible and not adversely disadvantage this protected characteristic group.

Evidence of positive or negative impact	Source of evidence	Context / activity to date	Further activity / enhancements to services required
<p>In 2017/18, 21% of school leavers who had been looked after for the full year before leaving school were unemployed. This rose to 29% for those who had been looked after for part of the year before leaving school. In comparison, 6% of all school leavers were unemployed. As noted under Disability/ASN, with schools closed, transition planning for young care experienced people is likely to be disrupted.</p> <p>They may have interrupted learning and often leave school earlier than young people who are not care experienced.</p>	<p>Education outcomes for Scotland's Looked After Children</p>	<p>Because the complaints procedure is available online and can be completed at any time anywhere the policy is widely accessible.</p>	

3.2 Poverty

After housing costs, around one fifth (19%) of people in Scotland were living in relative poverty in 2014-17. Those from equality groups are more likely to be living in poverty. In 2017/18, 10.2% of young people from the most deprived SIMD areas were unemployed 9 months after leaving school, compared to 2.7% of those from the least deprived SIMD areas ([Leaver Destinations supplementary data](#)).

The proportion of people in Scotland who are struggling financially or become impacted by poverty is likely to increase in the current situation and during the economic recovery.

Evidence of positive or negative impact	Source of evidence	Context / activity to date	Further activity / enhancements to services required
Many people, particularly those living in poverty and in other vulnerable groups, do not have access to digital content.	SDS's Equality Evidence Review	Because the complaints procedure is available online and offline and can be completed at any time anywhere the policy is widely accessible to everyone.	

3.3 Other vulnerable groups

Equality factor/ group	Evidence of positive or negative impact	Activity / enhancements to services required
Community Justice	www2.gov.scot/Publications/2008/06/30162955/4 : Scottish Government	

4. Action Plan

Action	Equality factor(s)	Anticipated outcome	Outcome measure	Timescale
Is an equality monitoring form part of the complaints process?	All	Ability to baseline and monitor complaints by protected characteristic group	Stats	Short to medium term