

Equality Impact Assessment

Report title	SHDC Housing Landlord Service Complaint Handling Policy and Procedure
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The following statements will help you decide whether an EIA is necessary:	Tick all that apply
Does it affect customers, colleagues or the wider community, and therefore potentially have an effect in terms of equality (for example, removing a service, workforce restructure, employment practices)	☒
Could it result in a decision being made that would significantly affect how functions and services are delivered (for example, reducing a service or introducing a charge for a service)	☒
Does it relate to a service that previous engagement has identified as being important to people	☒
Does it, or could it in the future, affect different groups of people differently	☒
Does it relate to a policy or service where there is significant potential for reducing inequalities or improving outcomes	☒
Have there been, or are there likely to be, any public concerns about the policy or proposal	
Does it have an effect on how other organisations operate in terms of equality (i.e. commissioned services)	

Section 3 Equality impacts	
Briefly explain what the policy/service/project aims to achieve	SHDC Housing Landlord Service have revised their Housing Complaints Policy to ensure it reflects the guidance and requirements from the Housing Ombudsman.

	The policy explains in detail who can make a complaint, how long it may take to investigate and what will and will not be investigated. It is expected that by providing this information to SHDC tenants, it will assist them in locating the information and advice they require in order to make a complaint and helpful links and advice to assist them. SHDC Housing Landlord Service have a separate Complaints policy from the corporate arrangements to ensure maximum compliance with the Housing Ombudsman complaint handling code. By adhering to a separate policy it will deliver real operational benefits for SHDC landlord service as well as improving tenant perception and relationships with SHDC service users. The policy provides a clear and concise methodology to both tenants wishing to complain and to officers managing the complaints process. The revised policy has been undertaken with our Complaints and Performance Focus Group to ensure that the policy reflects the voice of the tenant.
Have you undertaken consultation or involved people who are most likely to be affected or interested? Please include: data or community feedback, gaps in data, and how you intend to fill these gaps (where possible)	The revised policy responds to the requirements of the Housing Ombudsman and self assessment in line with the complaints handling code. The newly established Complaints Working Group has been informed of the changes, which reflect the work that they have been heading towards. The policy has been communicated to tenants in the Annual Report. This will also be published on the website. Tenants went through these revisions at the Focus Group meeting in November 2025. The policy has been drafted in accordance with the complaint handling code has been drafted with accessibility and equitable access in mind. The policy and complaint handling process are available in other formats including online and alternative languages upon request. The online policy has a high rating for accessibility. The service continues to promote the revised policy internally and externally and officers have Equality Diversity and Inclusion training scheduled for completion.

Is there any evidence or research that demonstrates why some individuals or groups are, or are not, affected	This policy seeks to ensure fair, robust and transparent investigation and resolution of complaints for everybody. It is clear that complaints can be received in a range of formats and can also be submitted by a third party or advocate. Consideration will be given to collating and monitoring information relating to diverse groups.
What impacts are there for each of the following characteristics	
Characteristics	Positive and negative impact
Gender	2019 report by ONS indicated that there was a higher proportion of women who had never used the internet 8.7%, compared with men at 6.3% potentially putting them of experiencing a negative impact of participating via online surveys or accessing online services. Positive: Range of options Negative: Digital Exclusion Any mitigation required: The complaint handling code specifies at 3.1 that organisations must make it easy for individuals to complain by providing difference channels to complain which minimises the risk of restriction from making a complaint due to digital exclusion. We have mitigated this by providing telephone numbers so that residents can ring the office and lodge their complaint. They have also been given a postal address should they wish to write into the office. Complaints can be received in a range of formats and via a third party or advocate.
Age	The median age of South Holland tenants is 63, however it should also be noted that there are more 76 year old tenants than any other single tenant age (modal average), eight of the top ten biggest single ages are in the mid sixties to mid seventies. There are around 100 residents aged 90 or above (Tenant census 2023) Positive: Making it easier for individuals to complain by providing different channels to complain which minimises the risk of over 65 from being restricted from making a complaint as a digital exclusion. Negative: Digital Exclusion It is possible that a higher percentage older residents may not have proficient ICT skills so may have difficulty

	locating online web forms. Any mitigation required: The complaint handling code specifies at 3.1 that organisations must make it easy for individuals to complain by providing difference channels to complain which minimises the risk of adults over 65 from being restricted from making a complaint due to digital exclusion. We have mitigated this by providing telephone numbers so that residents can ring the office and lodge their complaint. They have also been given a postal address should they wish to write into the office. Complaints can be received in a range of formats and via a third party or advocate. The code goes onto specify that organisations must anticipate the needs and reasonable adjustments of individuals who need to access the complaints process. We have mitigated this by carrying out a tenant census to understand the diverse needs of our tenants and further work will be done to understand our tenants' preferences. Awareness of the policy will form a key part of the implementation plan.
Disability	40% of all council housing residents have a limiting disability. This compares to just 19% of the South Holland district population as whole that has a limiting disability. When restricting analysis to just tenants, the proportion with a limiting disability increases to 51%. This proportion is higher than average, as only 41% of tenants in social housing in England and Wales in the UK 2021 census have a limiting disability (household reference person). Almost two thirds of households had at least one member with a disability (60%). (Tenant census 2023) Positive: Produce and document reasonable adjustments Our complaints handling process takes a pro-active approach in finding out if the tenant needs any assistance in making their complaint. Complaints can be received in a range of formats and via a third party or advocate. The complaint handling code states organisations must keep a record of any reasonable adjustments agreed, as well as a record of any disabilities an individual has disclosed. These reasonable adjustments can be recorded on the complaint handling spreadsheet. We will not report on where reasonable adjustments have been made but recording the information may help our service provision in the future. Negative: Using online webforms may lead to lower participation or digital exclusion by those that are disabled who account for 51% of tenants. Any mitigation required:

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Race	Positive: Reasonable adjustments The complaint handling code states organisations must keep a record of any reasonable adjustments agreed. These reasonable adjustments can be recorded on the complaint handling spreadsheet. We will not report on where reasonable adjustments have been made but recording the information may help our service provision in the future. Negative: Any mitigation required:
Religion or belief	No impact identified
Sexual orientation	No impact identified
Gender reassignment	No impact identified
Pregnancy, maternity and paternity	No impact identified
Marriage and civil partnership	No impact identified
Rural isolation	Positive: Range of options Negative: Digital exclusion. There is a possibility that rural isolation may impact a tenants ability to access online webforms. Any mitigation required: We have mitigated this by providing telephone numbers so that residents can ring

	the office and lodge their complaint. They have also been given a postal address should they wish to write into the office. Complaints can be received in a range of formats and via a third party or advocate. Awareness of the policy will form a key part of the implementation plan. Home visits offered by investigating officer.
Socio-economic factors	Positive: • Range of options for raising complaints in any way that suits them. • Review of our letters and use of appropriate and understandable language to meet the needs to the tenants. Negative: Digital exclusion. There is a possibility that socio-economic factors may impact a tenants ability to access online webforms. Any mitigation required: We have mitigated this by providing telephone numbers so that residents can ring the office and lodge their complaint. They have also been given a postal address should they wish to write into the office. Complaints can be received in a range of formats and via a third party or advocate. Awareness of the policy will form a key part of the implementation plan. Home visits offered by investigating officer.
Other (for example, those with dependents/caring responsibilities, asylum seeker and refugee communities, children in the care system, etc)	No impact identified
Overall, if there is a potential adverse impact after the mitigation, please state why and whether this is justifiable.	No adverse impact identified.

How will you monitor this to ensure there is no adverse effect in the future?	Protected characteristics will be recorded as part of the complaint handling process, by asking for this information it can be monitored how the Council has dealt with a complaint, and this might help identify any gaps or where people with protected characteristics are disproportionately affected which would in turn inform the annual review of the policy and when reporting on the relevant KPIs.
Outcome of EIA:	• Ensure the policy can be made available in a range of formats and media to make it accessible for all tenants upon request. • Continue to promote the complaints policy internally and externally. • On-going promotion of the policy via engaged tenants and groups. Who needs to know about the EQIA Internally • Officers – EQIA to be published Externally • Tenants – EQIA to be published. Others • EQIA to be published on the website • Update to Member responsible for complaints • Implementation briefing to Housing Service Managers