

Impact Assessment (IA) form (April 2024)

The Impact Assessment (IA) helps us to consider the impact of our work.

What is an Impact Assessment?

The IA helps us to understand the impact of our work and to inform our decision making. It helps to show how our activities supports several legal duties or priorities such as mainstreaming equality, considering island communities and promoting children's rights.

How do I complete the IA and what do I need to know?

The IA Guidance explains what IAs are and how to complete them. The appendix sets out different things that you need to think about for each section in the form. The Policy and Equality Team can also help: policyandequality@sssc.uk.com

Do I need to develop an IA?

You must complete an IA if you are creating or reviewing a relevant piece of work. Examples include a policy, procedure, strategy or project. It may also include an activity that has budgetary implications or a change that affects our employees or registrants. We complete assessments for different areas including the Future Proofing Programme, review of the website, HR policies and complaints procedure. We publish completed IAs on our website.

- You must complete an IA if the piece of work needs a decision from Council, Executive Management Team or a programme board. Your report should include a summary of the IA or explain why you didn't create one. See guidance for further information.
- You may need an IA for activities such as purchasing or developing a new product, creating a new strategy or implementing a project.
- Consider what you're doing and ask questions that help you to understand the impact of your work. Ask questions such as who your work affects, what difference will it make and what evidence do you have to support your approach.
- You must complete an IA as early as possible in the process. It should be proportionate and you may not need to complete every section. Some sections cover legal duties such as the Public Sector Equality Duty. Other sections link to our priorities such as promoting trauma informed practice.
- It is your responsibility to decide whether you need to complete an IA. Heads of Department are responsible for approving and monitoring IAs.

Data Protection Impact Assessments (DPIAs) and Strategic Environmental Assessments

- Data Protection Impact Assessments (DPIAs) are separate and are not part of this IA. See the [Information Governance](#) pages on the intranet for further information.
- SEAs are also separate assessments. See the IA guidance for further information.

Impact Assessment

SECTION A: GENERAL INFORMATION

Question	SSSC approach
A1. Name of piece of work	Complaints Handling Procedure (CHP) revision
A2. Brief description of work, including purpose and summary of aims.	<p>As a public body we are required to follow the guidance and procedures set out by the Scottish Public Services Ombudsman (SPSO). We first implemented the CHP in 2013. The SPSO revised the model complaints handling procedure (MCHP) in 2020 and we adopted this in the previous version of the CHP which was produced in March 2021.</p> <p>By adopting the MCHP we have aligned our complaints handling with other public sector organisations in Scotland. This means we can benchmark with other organisations and also makes sure the public receives a consistent service across the Scottish public sector.</p> <p>This Impact Assessment relates to minor revisions to the SSSC CHP to incorporate our responsibilities under SPSO's new Child Friendly Complaints Handling Principles.</p>
A3. How does the work link to our Strategic Plan 2023-2026? Choose one strategic theme. If helpful provide more information in A2.	Trusted
A4. Responsible department for this work	Performance and Improvement

A5. Date of last Assessment or policy review (if relevant)	April 2024
A6. Have you completed a Data Protection Impact Assessment? If yes please list the title and sign-off date.	Yes – April 2024

SECTION B: EQUALITY IMPACT ASSESSMENT (EQIA)

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section B of the Appendix.

Question	SSSC approach
B1. Understanding impact: How is this piece of work relevant to equality groups? Use this section to briefly set out the context. Have you considered where there might be an impact?	Note (delete before completing your response in this box) We recognise that some people may need more support to make a complaint to the SSSC. The revisions to the Complaints Handling Procedure (CHP) will ensure that all parties are supported to make a complaint and barriers to the process will be removed wherever possible. We have identified that the CHP will have an overall positive impact on a number of groups as indicated below. No negative impact on any groups.
B2. Reviewing evidence and finding gaps What internal or external evidence on equality groups did you use to support your understanding	Gender – positive impact The Complaints Handling Procedure Guidance for Complainants includes a focus on supporting vulnerable customers regardless of their reasons for requiring support. The CHP for complainants includes a specific section with signposting to

(step 1) and assessment (step 3). Did you find gaps in the data?

Examples could include data on SSSC employees: [Mainstreaming Report, Data Annex, 2023](#) or the social work, social care and children and young people workforce: [workforce data website](#).

Population data is available from the Scottish Government's [Equality Evidence Finder](#) and [National Records of Scotland](#) website.

resources for those who need help or support to make their complaint. Customers can make a complaint in whichever way suits them best – we can accept complaints in a variety of formats including online, by phone and in person.

Ethnicity – positive impact

Customers can make a complaint in whichever way suits them best – we can accept complaints in a variety of formats including online, by phone and in person. We can also provide our guidance in different formats, such as large font or different language, upon request.

Disability – positive impact

We can accept complaints from the representative of someone who is dissatisfied with our service (for example, a relative, friend, advocate or adviser) where a complainant needs further support, is particularly vulnerable or is unable or unwilling to submit a complaint themselves.

Customers can make a complaint in whichever way suits them best – we can accept and respond to complaints in a variety of formats including online, by phone and in person. We can also provide our guidance in different formats, such as large font or different language, upon request. BSL users can also contact us via contactSCOTLAND-BSL, the online British Sign Language interpreting service. This information is signposted on our public website.

The complaints form also asks complainants how they would prefer to be contacted, and when responding to complaints, staff are advised via the CHP to respond in the preferred method wherever possible (although it may be necessary to follow up in writing to confirm complaint outcomes).

Sexual orientation – neutral impact

No impact identified.

Gender reassignment – neutral impact

We recognise there could be a potential negative impact on customers who are transitioning or have transitioned if complaints are not handled sensitively. However, we feel this has been mitigated by the inclusion of guidance in the CHP on how to sensitively handle complaints where the complainant may contact us under a different name or pronoun than is held on their record. We regularly analyse complaints received under the CHP, and through the life of the process there has been no evidence that anyone has been negatively impacted on the basis of gender reassignment.

Age – positive impact

We can accept complaints from the representative of someone who is dissatisfied with our service (for example, a relative, friend, advocate or adviser) where a complainant needs further support, is particularly vulnerable or is unable or unwilling to submit a complaint themselves.

Customers can make a complaint in whichever way suits them best – we can accept complaints in a variety of formats including online, by phone and in person. We can also provide our guidance in different formats, such as large font or different language, upon request.

Where a complaint is made by a child (anyone under the age of 18), or where a complaint is made by an adult on behalf of a child, we will follow the [SPSO's Child Friendly Complaints Handling Principles](#).

Each complaint should be dealt with on a case-by-case basis. The child will be supported to make their complaint in a way that empowers them to make their views heard and make their own decisions on how they wish their complaint to be handled. This may include (but is not limited to) using the child's preferred method of communication, or communicating with an advocate the child has identified.

	<p>Full details on how a complaint from a child will be handled can be found in the SPSO's Child Friendly Complaints Handling Process Guidance.</p> <p>Marital and Civil partnership – neutral impact</p> <p>No impact identified.</p> <p>Pregnancy and maternity – neutral impact</p> <p>No impact identified.</p> <p>Religion/belief/non-belief – neutral impact</p> <p>No impact identified.</p>
<p>B3: Assessing impact and taking action</p> <p>Will your piece of work have a negative, neutral or positive equality impact? Explain why. List any actions and summarise in Section H.</p>	<p>Positive impact</p> <p>As identified above, the CHP will have a positive impact in terms of gender, ethnicity, disability and age, and a neutral impact on all other groups.</p>

SECTION C: CHILDREN'S RIGHTS AND CARE EXPERIENCE ASSESSMENT

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section C of the Appendix.

Question	SSSC approach
C1. Understanding impact: How is this piece of work relevant to children's rights and care experienced children and young people?	The proposal will have a positive impact on children and young people. We are aware that anyone may have experienced trauma, particularly care experienced children and young people.

<p>Use this section to briefly set out the context. Have you considered where there might be an impact?</p>	<p>We take a trauma informed approach to handing complaints. The CHP allows for complaints to be made by children and their carers or another representative such as an advocate complaining on their behalf in relation to the services provided.</p> <p>The revisions to this edition of the CHP will bring us inline with SPSO's Child Friendly Complaints Handling Principles, which were launched on 16 July 2024.</p> <p>Where a complaint is made by a child (anyone under the age of 18), or where a complaint is made by an adult on behalf of a child, we will follow the SPSO's Child Friendly Complaints Handling Principles.</p> <p>Each complaint should be dealt with on a case-by-case basis. The child will be supported to make their complaint in a way that empowers them to make their views heard and make their own decisions on how they wish their complaint to be handled. This may include (but is not limited to) using the child's preferred method of communication, or communicating with an advocate the child has identified.</p> <p>Full details on how a complaint from a child will be handled can be found in the SPSO's Child Friendly Complaints Handling Process Guidance.</p>
<p>C2. Reviewing evidence and finding gaps</p> <p>What internal or external evidence on children's rights or care experience did you use to support your understanding (step 1) and assessment (step 3). Did you find gaps in the data?</p> <p>Examples: Children's social work statistics available from Scottish Government website. The Promise</p>	<p>The changes to the procedure were made using the outcomes of SPSO's child friendly principles consultation, and changes were made to bring the policy in line with SPSO's process guidance.</p>

Scotland and the Children and Young People's Commissioner Scotland have several resources on care experience and children's rights.	
C3: Assessing impact and taking action Will your piece of work have a negative, neutral or positive impact on children's rights or care experience? Explain why. List any actions and summarise in Section H.	Positive impact – as outlined above, children will be supported to make a complaint themselves or to have a complaint made on their behalf by an advocate of their choosing.

SECTION D: TRAUMA INFORMED ASESMENT

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section D of the Appendix.

Question	SSSC approach
D1. Understanding impact: How is this piece of work relevant to trauma informed practice? Use this section to briefly set out the context. Have you considered where there might be an impact?	We are aware that anyone may have experienced trauma. We take a trauma informed approach to handing complaints, and do not want people to be retraumatised during the complaints process. The CHP allows for complaints to be made by any individual themselves, or by another representative such as an advocate complaining on their behalf in relation to the services provided where a complainant needs further support, is particularly vulnerable or is unable or unwilling to submit a complaint themselves.
D2. Reviewing evidence and finding gaps What internal or external evidence on trauma informed practice did you use to support your	We take a trauma informed approach to all our work. The CHP has been developed to take a trauma informed approach in line with all SSSC policies and procedures.

understanding (step 1) and assessment (step 3). Did you find gaps in the data?	
D3: Assessing impact and taking action Will your piece of work have a negative, neutral or positive impact on our work to promote trauma informed practice? Explain why. List any actions and summarise in Section H.	Positive – as outlined above.

SECTION E: ISLANDS, FAIRER SCOTLAND AND VULNERABLE PEOPLE ASSESSMENT

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section E of the Appendix.

Question	SSSC approach
E1. Understanding impact: How is this piece of work relevant to the Scottish Islands, promoting a Fairer Scotland or supporting vulnerable people? Use this section to briefly set out the context. Have you considered where there might be an impact?	The proposal will have a neutral impact on Island Communities. There is no identified impact on this group.
E2. Reviewing evidence and finding gaps What internal or external evidence on the Islands, Fairer Scotland or vulnerable people did you use to	N/A

<p>support your understanding (step 1) and assessment (step 3). Did you find gaps in the data?</p> <p>Examples: Scottish Government publishes data on composition of island population. We publish workforce data on proportion of staff in island local authority areas. The Government also publishes data on poverty and carers: Poverty and Income inequality statistics and Carers Census.</p>	
<p>E3: Assessing impact and taking action</p> <p>Identify any actions here, including timescales, lead responsibility and how you'll monitor success.</p>	<p>N/A</p>

SECTION F: EMPLOYER ASSESSMENT

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section F of the Appendix.

Question	SSSC approach
<p>F1. Understanding impact: How is this piece of work relevant to employers?</p> <p>Use this section to briefly set out the context. Have you considered where there might be an impact?</p>	<p>All SSSC stakeholders, including employers, are supported to use the CHP.</p> <p>The proposal will have a neutral impact on employers. There is no identified impact on this group.</p>
<p>F2. Reviewing evidence and finding gaps</p> <p>What internal or external evidence on employers did you use to support your understanding (step 1) and assessment (step 3). Did you find gaps in the data?</p> <p>Examples: Our data website has information on employers and active services registered with the Care Inspectorate. For example, have you consulted employers on your proposals? Have you identified any challenges or options?</p>	N/A
<p>F3: Assessing impact and taking action</p> <p>Identify any actions here, including timescales, lead responsibility and how you'll monitor success.</p>	N/A

SECTION G: SUSTAINABILITY ASSESSMENT

Please see guidance notes before completing the second column in this section, particularly Part 2 and Section G of the Appendix.

Question	SSSC approach
G1. Understanding impact: How is this piece of work relevant to sustainability? Use this section to briefly set out the context. Have you considered where there might be an impact?	The CHP is largely an online process. There are no sustainability concerns.
G2. Reviewing evidence and finding gaps What internal or external evidence on sustainability did you use to support your understanding (step 1) and assessment (step 3). Did you find gaps in the data?	N/A
G3: Assessing impact and taking action Identify any actions here, including timescales, lead responsibility and how you'll monitor success.	N/A

H. FINAL REVIEW AND SIGN-OFF

SSSC approach	SSSC approach
---------------	---------------

<p>H1. Summary of Assessment</p> <ul style="list-style-type: none"> a. Summary of any actions or changes found during assessment b. How will we monitor this piece of work and any further impacts? 	<p>The updated CHP contains only minor revisions to the previous procedure. The revisions allow us to incorporate the SPSO's Child Friendly Complaints Handling Principles to keep us in line with SPSO's current best practice. These changes further support the procedure to have a positive impact on children and young people, particularly care experienced children.</p> <p>We will continue to review our complaints performance in line with SPSO guidelines and best practice.</p>
<p>H2. Owner (Head of Department):</p> <p>Date approved by Head of Department:</p> <p>12th July 2024</p>	<p>Head of Performance and Improvement</p>

NEXT STEPS

Send completed IA to [Policy and Equality Team](#). Please let know the Team know when the IA should be published on our website or if there is any reason why we should not publish the IA.

Reports to Council, Committee, Executive Management Team and Programme Boards must include your IA. Please contact [Legal and Corporate Governance team](#) for further information.