

# REPORT TO GOVERNANCE AND AUDIT COMMITTEE

**REPORT OF:** Head of People, Projects and Performance

**REPORT NO:** CSCL001

**DATE:** 26 September 2013

<b>TITLE:</b>	Customer Feedback	
<b>KEY DECISION OR POLICY FRAMEWORK PROPOSAL:</b>	Not applicable	
<b>PORTFOLIO HOLDER: NAME AND DESIGNATION:</b>	Concillor Paul Carpenter Portfolio: Governance and Communication	
<b>CONTACT OFFICER:</b>	S Griffiths (01476) 406104 s.griffiths@southkesteven.gov.uk  L Sirdifield (01476) 406524 lee.sirdifield@southkesteven.gcsx.gov.uk	
<b>INITIAL IMPACT ANALYSIS:</b>  <b>Equality and Diversity</b>	Carried out and Referred to in paragraph (7) below	Full impact assessment Required:
<b>FREEDOM OF INFORMATION ACT:</b>	This report is publicly available via the Your Council and Democracy link on the Council's website: <a href="http://www.southkesteven.gov.uk">www.southkesteven.gov.uk</a>	
<b>BACKGROUND PAPERS</b>	<i>Presentation to Engagement PDG – 18 July 2013</i> <a href="http://moderngov.southkesteven.gov.uk/mgConvert2PDF.aspx?ID=11960">http://moderngov.southkesteven.gov.uk/mgConvert2PDF.aspx?ID=11960</a>	

## **1. RECOMMENDATIONS**

- 1.1 Governance and Audit approve the amendments to the customer feedback process.

## **2. PURPOSE OF THE REPORT**

- 2.1 The report details proposals for the councils customer feedback process to ensure that a consistent approach is adopted across the council and to raise the standards of service to our residents and stakeholders.
- 2.2 The report details the way in which customer feedback will be handled to minimise the number of complaints that are escalated and to ensure that we can capture and share good practice and lessons learnt across the organisation.

## **3. DETAILS OF REPORT**

- 3.1 In September 2012 it was agreed that officers would begin to analyse how well the council manages customer feedback. A review of existing processes was undertaken and this work has led to a revised customer feedback process being proposed. Evidence from our review showed that we did not have an overall consistent approach to managing customer feedback, whether it is a comment, compliment or complaint.
- 3.2 Whilst pockets of good practice exist, the ethos of how to deal with customer feedback is not explicit and compliments are not always being recorded. Difficulties have also been experienced when managing cross service complaints as they have not been seen to be owned by a particular manager. The standard of our responses to customer varied across the organisation. Some were excellent, but this good practice was not always shared.
- 3.3 Since September 2012 officers have reviewed all customer feedback in detail on a weekly basis. This has enabled us to identify trends in complaints and home in on the areas of high and low performance. Feedback has been shared with Service Managers and officers to help departments understand what they do and how they could improve.
- 3.4 Whilst undertaking this work, research has been completed to identify good practice from other Local Authorities. Training has been commissioned to develop the skills within the organisation and a suite of letters have been developed to provide a more comprehensive, high quality response to those taking the time to offer feedback to us. A customer focus group has also been established to enable officers to continue to gain more feedback, understanding and expertise.
- 3.5 We are now in a position where departments capture much more information about our customer feedback through our performance management software. This is allowing us to share the lessons that we have learnt and respond to all types of feedback, including compliments. We now thank customers for taking the time to praise our staff as well as telling us about things when they go wrong.
- 3.6 The revised processes are detailed in appendix 1 to this report. They will ensure that complaints are handled more swiftly and reduce the likelihood of a complaint escalating. This will be achieved by better management of complaints at the first stage of the process with a higher quality, more comprehensive response being sent to customers within agreed time periods. The process helps to clarify what a

complaint is and ensures that where other routes are available, that these routes are exhausted in the first instance. For example a customer may wish to question a planning decision. Whilst many customers will communicate this to us by way of a complaint, the correspondence is really a challenge against the decision that the authority has made. A statutory appeals and dispute process exists for these cases, so cases of this nature would be channelled through that route.

- 3.7 On occasion, customers wish to challenge a decision and complain about their customer experience. In these circumstances we would investigate and respond to the matters that are truly a complaint and advise the customer that the other items will be considered through the formal appeals channel.
- 3.8 Our improved procedure is based on best practice and the research that we have completed. It links directly into our values and behaviours to ensure that we listen and respond to our customers. Clear time scales are set out in the process so both officers and customers know what is expected. The procedure sets out the following stages:
- Stage 1: Response from Service Manager with Head of Service reviewing all letters
  - Stage 2: Response from independent Head of Service review (within 3 months of initial complaint)
  - Stage 3: Response from independent Director – thorough review prior to Local Government Ombudsman
  - *For Housing Complaints a housing panel will consider cases after stage 3*
- 3.9 During each of these stages we have recognised that good communication with our customers is essential to effectively manage their complaint. At all stages we will acknowledge receipt of their complaint within three days of receipt. For stage 1 and stage 2 of the process we will complete a full response within 15 days of the complaint being made, unless otherwise agreed with the customer. To be escalated between stages a customer must indicate that they are unhappy with the outcome within three calendar months.
- 3.10 We also want to make sure that we tackle repeated failures in service delivery. Where a customer reports the same complaint within a two month time period it will usually relate to a repeated service failure. In these cases, the complaint will be re-opened at stage 2 of the process. However, if more than two months have elapsed since the original complaint we will treat it as a new complaint and work from stage 1 of the process.
- 3.11 The Council must also ensure that it meets the requirements of the Localism Act 2011 in relation to complaints from tenants. Stage 4 of our process ensures these requirements are met. This legislation provides tenants with a right to a “democratic filter” to assist in their complaints about housing being resolved at a more local level. The democratic filter enables a tenant to bring their complaint before a tenant panel once stage three of the process has been exhausted. Specially trained tenants will hear the complaint and try and help to get a resolution. Tenants will still have a right to complain to the Local Government Ombudsman if they are still unhappy after the panel has considered their case.

- 3.12 The revised procedure provides customers and the authority with an increase level of independence at an earlier stage. This brings fresh eyes to the problem and allows a greater level of challenge. The senior managers involved in the process will be able to change procedures or policies if they are causing problems and help to show that we act on the feedback that we are given.
- 3.13 Having clear timescales within the process will help to ensure that customer feedback is dealt with in a timely manner. It will prevent customers escalating their complaint at a later date when there has been a significant delay in the customer responding to our correspondence. The process also enables a quicker route to the Ombudsman for those who feel that they have a serious grievance.
- 3.14 The process removes the requirement for complaints to be passed to a member panel. Feedback from customers, members and other organisations is that the panels typically met infrequently and operated in an adversarial manner. There were concerns from customers that the hearing was not truly independent and often members would have limited powers to make amendments. This change was discussed at the Engagement PDG on 18<sup>th</sup> July 2013 and received support from that group. It was also agreed that an annual report detailing customer feedback would be made available to members to ensure that they continue to have visibility of our customers' views.
- 3.15 Member feedback will be provided by way of an annual report to cabinet and scrutiny committee, together with a copy of the Ombudsman letter for the authority. A clear procedure will be introduced to enable members to help their residents with complaints. Members will be able to make recommendations from the feedback provided and be confident that the feedback process operated by the council conforms to best practice. Feedback will also be provided on a monthly basis to the Performance Board.
- 3.16 The revised process will provide customers with refreshed documentation clearly detailing our approach to customer feedback. An example leaflet will be available to the Governance and Audit Committee. The process will be accessible through our website and through each of our customer facing offices as will a revised leaflet detailing the feedback process.

#### **4. OTHER OPTIONS CONSIDERED**

- 4.1 As detailed earlier in the report, officers have evaluated existing processes and those operated by others to identify best practice. These findings have been used to develop the proposed customer feedback process.

#### **5. RESOURCE IMPLICATIONS**

- 5.1 The introduction of the new Customer Feedback process will ensure that existing resources are used effectively to manage the customer experience. No additional resources will be required as a result of this change.

#### **6. RISK AND MITIGATION**

- 6.1 Risk has been considered as part of this report and any specific high risks are included in the table below:

Category Risk	Action / Controls
Reputational	<p>Failure to respond to complaints in a timely manner can result in complaints escalating and a poor image for the organisation.</p> <p>This process ensures that customer feedback is dealt with in a timely manner.</p>
Legislative	<p>There is a requirement to ensure that our process meets the requirements of the Localism Act 2011. A failure to update our processes would result in us not meeting our statutory obligations.</p> <p>This process ensures that our obligations are met.</p>

## 7. ISSUES ARISING FROM IMPACT ANALYSIS

- 7.1 An initial impact assessment has been completed. This is shown as appendix 2. There are no adverse impacts from this change in process.

## 8. CRIME AND DISORDER IMPLICATIONS

- 8.1 Not applicable

## 9. COMMENTS OF FINANCIAL SERVICES

- 9.1 There are no specific financial comments to make in respect of this report.

## 10. COMMENTS OF LEGAL AND DEMOCRATIC SERVICES

- 10.1 The terms of reference of the Governance and Audit Committee provide for the committee to review the process for dealing with complaints. The proposals provide a more streamlined approach to dealing with complaints and provide for a tenants panel which was introduced in the Localism Act 2011.

## 11. COMMENTS OF OTHER RELEVANT SERVICES

- 11.1

## 12. APPENDICES:

**Appendix 1:** Customer Feedback Process

**Appendix 2:** Initial Impact Assessment

**SOUTH KESTEVEN DISTRICT COUNCIL  
CUSTOMER FEEDBACK PROCESS  
Compliments, Comments & Complaints  
June 2013**

# Customer Feedback Procedure

## Introduction

South Kesteven District Council are committed to delivering an excellent quality of service and want to hear what you think of us, whether you were really pleased with your experience, felt we could have done better or simply want to share your thoughts.

We want to learn from what our customers have to say and that is why it is so important to us. We need to know if you feel we got it wrong or could have done something better or if we didn't meet your expectations.

We hope this procedure for dealing with comments, compliments and complaints will make it easier for you to provide us with this valuable feedback.

We aim to:

- ✓ Enable our customers to give us their feedback by whatever means they find easiest
- ✓ Ensure all feedback is responded to fully and efficiently within reasonable timescales
- ✓ Learn important lessons from all our feedback and share that across all of our organization

Why do we want your feedback?

**All the colleagues within South Kesteven District Council work in line with our Values and Behaviours and when it comes to customer feedback, there's no exception:**

**“We listen and respond to our customers”**

- ✓ **We know who our customers are both external and internal**
- ✓ **We listen to our customers and make decisions based on their needs**
- ✓ **We put ourselves in our customers shoes**
- ✓ **We do not pass the buck when something goes wrong**
- ✓ **We are honest when we get things wrong and learn from the feedback people give us**

If you require assistance in completing the feedback form, please phone us or call into your nearest office where our staff will be happy to help you.

To ensure everyone has access to our information it is available in a range of different formats, including large print and computer disc on request.

## What type of feedback can you give?

### Tell us what you liked.....

This could be about a person, a service, a single event or a chain of circumstances that made your experience a positive one.

Definition of **compliment - noun**

Pronunciation: [/ˌkɒmplɪm\(ə\)nt/](#)

- ✓ a polite expression of praise or admiration
- ✓ an act or circumstance that implies praise or respect

Definition of **comment - noun**

- ✓ a verbal or written remark expressing an opinion or reaction

### Tell us what you thought.....

About a standard of service, process or decision made by SKDC or our team. Maybe you have a suggestion about something we could do differently.

### Tell us what you didn't like.....

Perhaps about a standard of service, a failure to meet your expectations, an action or a lack of action or because you found it difficult to access our services – anything which you feel is unacceptable

Definition of **complaint - noun**

- ✓ a statement that something is unsatisfactory or

## **Is there anything that we won't include in this process?**

**An initial request for service to be delivered is not a complaint.**

We are also unable to include matters that have an alternative statutory appeals process. For example:

- appeals about parking fines/penalty charge certificates
- **appeals about homeless decision**
- **appeals about points allocation in your application for council housing**
- **appeals about planning applications/decisions**
- **planning consultation responses**
- **appeals about recharge fees for repairs**
- **appeals about fixed penalties**
- **matters subject to legal action**
- **political comments**
- **complaints from staff about personnel issues**

This list is not exhaustive.

## **What will we do when we receive your feedback?**

**We will:**

- ✓ **acknowledge and respond to your feedback within the laid down time limits**
- ✓ **in our acknowledgement, tell you the name of the person or section that will deal with your feedback**
- ✓ **if the investigation results in complexities which mean we can't meet our own timescales we will keep you fully informed**
- ✓ **in our response tell you what we are able to do or what we are not able to do and why**
- ✓ **admit when things go wrong**

- ✓ **learn from your feedback, and share that learning across the organisation**
- ✓ **if this process does not cover your complaint (eg if there is a statutory right of appeal etc) we will advise you the course of action you need to take**

## **The process**

We want to make it as easy as possible for you to feedback to us, you can do this by:

- ✓ **filling in a feedback form online**  
[www.southkesteven.gov.uk/feedback](http://www.southkesteven.gov.uk/feedback)
- ✓ **emailing Customer services**  
[customerservices@southkesteven.gov.uk](mailto:customerservices@southkesteven.gov.uk)
- ✓ **calling our customer service team on 01476 406080**
- ✓ **filling in a feedback form – available from our 4 customer service centres in Grantham, Bourne, Stamford or Market Deeping**
- ✓ **write us a letter and send it to:**

**The Customer Services Team  
South Kesteven District Council  
Council Offices  
St Peters Hill  
Grantham  
Lincs  
NG31 6PZ**

## **Compliments**

Customers don't always have the time to let us know if they have been particularly pleased with our service so when they do we want to make sure we learn from what we did right and do it more!

We will ensure that the positive feedback is shared with the service and if appropriate the individual involved and acknowledge your compliment with a response within 3 working days.

## **Comments**

These are important because it could help us shape the ways services look or influence decisions we make in the future.

We can't guarantee that we can always make the suggested or requested changes but we will reply in full within 15 working days to explain why a decision or process exists in its current form, what we might do differently or why we won't be able to change things in the future

## **Complaints**

### ***Stage 1***

**We are sorry that you feel that a matter is so serious that it needs to be dealt with as a formal complaint.**

**We will acknowledge it within 3 working days and we will tell you who will be dealing with it – it will usually be the service manager for the department it relates to. They will provide you with a full response within 15 working days or explain why they are unable to and give you an achievable date for you to receive a response by.**

### ***Stage 2***

**If you are unhappy with the stage 1 response you have the right to request that it is looked at by a service head, who is not directly linked to the original department the complaint was about; this is to ensure the review is as objective as possible. This request should be received within 3 months of you receiving your stage 1 response. The service head will review the previous decisions and decide if they were fair and reasonable.**

**We will acknowledge your communication within 3 working days. The service head will investigate your complaint and will provide you with a full response within 15 working days or explain why they are unable to and give you an achievable date for you to receive a response by.**

### ***Stage 3***

**If you still feel our response is unacceptable you can request that it is reviewed by a director. To ensure an objective review the director will not have direct line management responsibility for either the service head or service manager who**

has already been involved in your complaint. This request should be received within 3 months of you receiving your stage 2 response.

We will acknowledge your communication within 3 working days. The director will investigate your complaint and will provide you with a full response within 15 working days or explain why they are unable to and give you an achievable date for you to receive a response by.

Ombudsman

If you are still dissatisfied with the way we have dealt with your complaint, you have the right to ask the Local Government Ombudsman, an independent body, to investigate allegations of maladministration causing an injustice to anybody who has complained.

This means there has been a fault in the way the Council has or has not done something and it has created difficulties for you personally. The Ombudsman does not usually criticise the merits of a decision which has been properly taken simply because someone may disagree with it. They will however look at the way the decision was made.

The Ombudsman will not usually consider a complaint until the Council has had a chance to resolve the matter through its own procedure.

Their contact details are:

The Local Government Ombudsman  
PO Box 4771  
Coventry  
CV4 0EH  
Tel: 0300 061 0614  
Fax 024 7682 0001  
Web [www.lgo.org.uk](http://www.lgo.org.uk)

Tenant complaints

The Localism Act 2011 introduced changes including that, from April 2013, tenants have a right to a 'democratic filter' to assist in their complaints about housing being resolved at a more local level. Housing complaints which are referred to the Ombudsman service will now go to the separate Ombudsman for Housing rather than, as previously, to the Local Government Ombudsman. This is intended to ensure that all tenants of councils and other social landlords are treated consistently.

If you are a council tenant and you are making a complaint about a housing issue, and you feel that we have not been able to resolve your issue at 'stage 3' of our complaints policy, then you are entitled to bring it before our tenant panel. This panel meets the requirements of the Localism Act for a 'democratic filter' and is made up of specially trained tenants that will hear your complaint to try and help get a resolution.

To do this, please put your request in writing to:

**Tenants Panel  
Council Offices  
St Peters Hill  
Grantham  
Lincs  
NG31 6PZ**

**After this, if you are still unhappy you can take your complaint to the housing ombudsman, not the Local Government Ombudsman as other complainants do.**

**Their contact details are:**

**Housing Ombudsman Service  
81 Aldwych  
London  
WC2B 4HN  
Tel: 0300 111 3000  
Fax: 020 7831 1942  
Email: [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk)**

How was your experience of our feedback process?

**We want to make sure that we deliver against this process as we have committed to so every month we will carry out a survey of 10 random customers who have been through our customer feedback process in that month.**

**We hope that regardless of whether the outcome of your feedback was what you had wanted you will be able to take part in a survey on your experience of the process.**

**This allows us to ensure that we are performing consistently across the organisation when it comes to responding to feedback and that we are following our own document process in all cases**

**If you do not wish to take part in a survey relating to your customer feedback experience, please let us know directly when you have received your feedback response.**

## **Unreasonable persistent complaints**

On rare occasions we may have to make a difficult decision about a complainant who we feel is being unfair or persistent in the manner or frequency of their contact.

The decision to do this will not be taken easily and will be taken by the Head of People, Projects and Performance (after taking legal advice if appropriate)

The options that will be considered on such occasions are likely to be:

- ✓ identifying a single point of contact within the organization that customer may contact in relation to their complaint/s
- ✓ only accepting contact by a particular channel (only by letter for example)

In some cases we may decide that the only option is to:

1. Refer the complaint to the Ombudsman before we have completed all the stages of our complaints process – this is the result of an agreement between South Kesteven District Council and the complainant.
2. Advise the complainant that we cannot assist with the complaint any further and advise them that the next option available is to approach the Ombudsman – this may be necessary when South Kesteven District Council and the complainant cannot agree on a way forward. In these cases we will not contact the ombudsman but will advise the complainant in writing that we will not be responding to the complaint any further

In all cases of unreasonable or persistent complaints the Customer Service manager will write to the complainant to explain why we feel the complaint falls into this category and what action we are taking

## **Further contact details**

**If you wish to complain about your local Councillor, contact:**

**The Legal & Democratic Services Team  
South Kesteven District Council  
Council Offices  
St Peters Hill  
Grantham  
Lincs  
NG31 6PZ**

[www.southkesteven.gov.uk/memberscomplaints](http://www.southkesteven.gov.uk/memberscomplaints)

Tel: 01476 40 60 80



## South Kesteven District Council

### Equality Analysis (Stage 1)

### Customer Feedback Process

<b>Service Area:</b>	<b>Lead officer:</b> Lee Sirdifield	<b>Date of Meeting</b>
CORPORATE	<b>Assessor:</b> Kirsty Callacher	12/09/13
	<b>Neutral Assessor:</b> Carol Drury	

**1. Name and description of policy/service/function/strategy**

Customer Feedback Process

**South Kesteven District Council are committed to delivering an excellent quality of service and want to hear what our customers think of us, whether they were really pleased with their experience, felt we could have done better or simply want to share their thoughts.**

**We want to learn from what our customers have to say and that is why it is so important to us. We need to know if they feel we got it wrong or could have done something better or if we didn't meet their expectations.**

The policy aims to:

- ✓ Enable our customers to give us their feedback by whatever means they find easiest
- ✓ Ensure all feedback is responded to fully and efficiently within reasonable timescales
- ✓ Learn important lessons from all our feedback and share that across all of our organisation

It is important that the council effectively manages feedback from its customers. A revised policy has been designed to enable us to gain a more detailed insight into our customers' expectations and respond more appropriately to them.

**Is this a new or existing policy?**

**Existing**

2. Complete the table below, considering whether the proposed policy/service/function/strategy could have any potential positive, or negative impacts on groups from any of the protected characteristics (or diversity strands) listed, using demographic data, user surveys, local consultations evaluation forms, comments and complaints etc.

Equality Group	Does this policy/service/function/strategy have a positive or negative impact on any of the equality groups?  Please state which for each group	Please describe why the impact is positive or negative. If you consider this policy etc is not relevant to a specific characteristic please explain why
<b>Age</b>	Neutral	Age would not be a determining factor in either the ability to feedback or in the response. Policies are available in large print and assistance can be provided where necessary.
<b>Disability</b>	Neutral	We can assist customers with disabilities in several different ways. We have: <ul style="list-style-type: none"> <li>• hearing loops in all our offices,</li> <li>• coloured overlays for customers with colour blindness and dyslexia</li> <li>• forms available on our website</li> <li>• A Text Relay service available for people with hearing impairments</li> <li>• officers that can help with the completion of the form.</li> </ul>
<b>Race</b>	Neutral	We recognise that some customers may have difficulty communicating their concerns if their first language is not English. However: <ul style="list-style-type: none"> <li>• the form is available in a variety of languages</li> <li>• It is available on our website that can be viewed in different languages</li> <li>• We have Language Line available to help customers and then an officer can assist with filling in the form.</li> <li>• We can also organise for</li> </ul>

		a translator to assist the customer.
<b>Gender Reassignment</b>	Neutral	Gender reassignment would not be a determining factor in either the ability to feedback or in the response.
<b>Religion or Belief</b>	Neutral	Religion or belief would not be a determining factor in either the ability to feedback or in the response.
<b>Sex</b>	Neutral	Sex would not be a determining factor in either the ability to feedback or in the response.
<b>Sexual Orientation</b>	Neutral	Sexual orientation would not be a determining factor in either the ability to feedback or in the response.
<b>Pregnancy and Maternity</b>	Neutral	Pregnancy and maternity would not be a determining factor in either the ability to feedback or in the response.
<b>Marriage and Civil Partnership</b>	Neutral	Marriage and civil partnership would not be a determining factor in either the ability to feedback or in the response.
<b>Carers</b>	Neutral	Carers would not be a determining factor in either the ability to feedback or in the response.
<b>Other Groups (e.g. those from deprived (IMD*) communities; those from rural communities, those with an offending past)</b>  *(IMD = Indices of multiple deprivation)	Neutral	We recognise that people with learning difficulties or literacy issues may need assistance should they wish to raise a concern with us. Customers would be offered assistance in filling in the form at any of our contact centres. Trained officers are available during normal office hours to help wherever needed.

<b>General comments</b>	<p>The response to any feedback is not governed by any individual protected characteristic.</p> <p>Supporting guidance is provided to customers and available in a variety of formats on request.</p> <p>Wherever a need is identified we give feedback in an appropriate format.</p>
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**3. What equality data/information did you use to inform the outcomes of the proposed policy/service/function/strategy? (Note any relevant consultation who took part and key findings)**

The Council holds information about its customers in its Customer Relationship Management software. This enables us to identify the needs of individuals and households and tailor our services appropriately.

**If there are any gaps in the consultation/monitoring data, how will this be addressed?**

We believe the information we have is comprehensive, however, the introduction of a Citizens Panel, which closely resembles the demography of the district, will further assist. Also, we have the Community Focus Forum made up of representatives from hard to reach groups, who will be consulted on a regular basis.

**4. Outcomes of analysis and recommendations (please note you will be required to provide evidence to support the recommendations made): Please check one of the options.**

a)	No major change needed: equality analysis has not identified any potential for discrimination or for negative impact and all opportunities to promote equality have been taken	<input checked="" type="checkbox"/>
<b><i>If you have checked option a) you will need to complete a Stage 3 analysis when your policy/service/function/strategy has been implemented</i></b>		
b)	Adjust the proposal to remove barriers identified by equality analysis or to better promote equality.	<input type="checkbox"/>
<b><i>If you have checked option b) you will need to answer questions b.1 and b.2</i></b>		
c)	Adverse impact but continue	<input type="checkbox"/>
<b><i>If you have checked option c) you will need to answer questions c.1</i></b>		
d)	Stop and remove the policy/function/service/strategy as equality analysis has shown actual or potential unlawful	<input type="checkbox"/>

**b.1 In brief, what changes are you planning to make to your proposed policy/service/function/strategy to minimise or eliminate the negative equality impacts?**

[Empty text box]

**b.2 Please provide details of whom you will consult on the proposed changes and if you do not plan to consult, please provide the rationale behind that decision.**

[Empty text box]

*If you have checked option b) you will need to complete a Stage 2 equality analysis*

**c.1 Please provide an explanation in the box below that clearly sets out your justification for continuing with the proposed policy/function/service/ strategy.**

[Empty text box]

***If you have checked option c) you will need to complete a Stage 2 equality analysis. You should consider in stage 2 whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.***

**Signed (Lead Officer):**  
*(Name and title)*

**Lee Sirdifield**  
*Customer Services Manager*

**Date completed:**

13.9.13

**Signed (Neutral Assessor):**  
*(Name and title)*

**Carol Drury**  
*Community Engagement and Policy Development Officer*

**Date signed off:**

13/09/13