

Equality Impact Assessment Template – Policy, function or strategy

This document should be completed when a new policy, function or strategy is introduced or when a substantive change to an existing policy, function or strategy is recommended.

1. Policy, function or strategy		
a.	Name/description of the policy, function or strategy ¹	Unacceptable Actions Policy
b.	Responsible organisation(s)/Lead Service	Legal, Democratic, Digital and Customer Services
c.	Lead Officer	Head of Legal, Democratic, Digital and Customer Services
d.	Date of Impact Assessment	3 March 2025
e.	Partners/other Services involved in the development of the policy, function or strategy	Corporate Management Team (CMT) Information Governance Steering Group
f.	Is the policy, function or strategy?	<input type="checkbox"/> New
		<input checked="" type="checkbox"/> Reviewed/Revised
g.	What is the purpose of the policy, function or strategy (include details of any new legislation which prompted the introduction of the policy, function or strategy or the substantive change to the policy, function or strategy)?	<p>Inverclyde Council aims to deal fairly and consistently with all customers and wants its complaints policy to be accessible to all. The purpose of the Unacceptable Actions Policy is to ensure that appropriate steps can be taken against the small number of customers whose behaviour is deemed unacceptable. There are 3 key aims:</p> <ul style="list-style-type: none">To ensure unreasonable actions of a small minority of customers do not limit the effectiveness of the Council by placing unreasonable demands on Council resources.

¹ Please attach details of the policy, function or strategy to this Template

		<ul style="list-style-type: none">• To ensure Inverclyde Council meets its duty of care towards employees by setting out clear guidance on how to deal with unacceptable actions by customers.• To ensure that, in the application of this policy, individual circumstances are taken into account, particularly where the customer may be vulnerable.	
h.	What are the intended outcomes of the policy, function or strategy?	<p>Customers and employees are aware of their rights and responsibilities when dealing with the Council.</p> <p>Customers and employees are aware of the Council's zero tolerance approach to violence, threats and abuse of staff.</p> <p>Customers who demonstrate unacceptable behaviours are dealt with fairly and consistently and in a confidential, sensitive and objective manner.</p> <p>Account is taken of the individual circumstances of customers, particularly those who are vulnerable or may have mental health conditions.</p>	
i.	Geographical area (Inverclyde-wide or a specific location)	The policy will impact on all employees who deal with customers and complainants. It will also impact on all customers who demonstrate unacceptable behaviours.	
j.	Which parts of the Equality Duty will the policy, function or strategy impact on?	X	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by The Equality Act 2010
			Advance equality of opportunity between people of different groups
		X	Foster good relations between people from different groups

k.	Will those who may be directly or indirectly affected by the policy, function or strategy be involved in its development?	No.
----	---------------------------------------------------------------------------------------------------------------------------	-----

2. Does the policy, function or strategy impact on:		
	Yes	No
a. Protected Characteristics under The Equality Act 2010: Age; Care experienced; Disability; Gender Reassignment; Marriage and Civil Partnership; Pregnancy and Maternity; Race; Religion and Belief; Sex; Sexual Orientation (see Section 3)		X
b. Reducing inequalities of outcome caused by socio-economic disadvantage – Fairer Scotland Duty ² (see Section 6)		X
c. Inverclyde Alliance Partnership Plan 2023/33 ³ (see Section 7)		X
d. Council Plan 2023/28 ⁴ (see Section 8)	X	
3. If ‘Yes’ is selected for any part of Section 2, please populate the other relevant Sections of this Template.		
4. If ‘No’ is selected for <u>every part</u> of Section 2, please state the reasons for this.		

² [Fairer Scotland Duty: guidance for public bodies](#)
³ [Inverclyde Alliance Partnership Plan 2023/33](#)
⁴ [Council Plan 2023/28](#)

Please sign below and email a copy of this Template to Karen Barclay, Corporate Policy and Performance Officer:	
<u>karen.barclay@inverclyde.gov.uk</u>	
Signature:	Date:

3. Impact – Protected Characteristics						
Which of the Protected Characteristics will the policy, function or strategy have an impact upon?						
Protected Characteristic	Impact					Reasons/Comments
	Positive High	Low	Neutral	Negative High	Low	
Age			X			The policy applies equally to all Council employees and to all Council customers/service users.
Care experienced			X			The policy applies equally to all Council employees and to all Council customers/service users.
Disability			X			The policy applies equally to all Council employees and to all Council customers/service users. The policy can be made available in other formats on request. The policy is written in simple and easy to understand language. The policy stipulates that individual circumstances must be taken into account in the application of the policy.

Classification : Official

						When unacceptable actions are connected with a disability, reasonable adjustments will be made in applying the policy. This can include the use of third party advocates to assist customers in outlining their complaint.
Gender Reassignment			X			The policy applies equally to all Council employees and to all Council customers/service users.
Marriage and Civil Partnership			X			The policy applies equally to all Council employees and to all Council customers/service users.
Pregnancy and Maternity			X			The policy applies equally to all Council employees and to all Council customers/service users.
Race			X			<p>The policy has no differential impact with regards to the race of customers. Translated copies of the policy will be made available if required.</p> <p>The policy applies equally to all Council employees and to all Council customers/service users.</p>
Religion and Belief			X			The policy applies equally to all Council employees and to all Council customers/service users.
Sex			X			The policy applies equally to all Council employees and to all Council customers/service users.
Sexual Orientation			X			The policy applies equally to all Council employees and to all Council customers/service users.
Other groups to consider <ul style="list-style-type: none">• Carers			X			The policy applies equally to all Council employees and to all Council customers/service users.

Classification : Official

<ul style="list-style-type: none">The Armed Forces Covenant Duty						
--------------------------------------------------------------------------------	--	--	--	--	--	--

4. Which parts of the Equality Duty will the policy, function or strategy have an impact upon?	
X	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by The Equality Act 2010
<input type="checkbox"/>	Advance equality of opportunity between people from different groups
X	Foster good relations between people from different groups

5. Impact – Groups	
From the information you have highlighted above, describe the positive and negative impacts and the groups affected under The Equality Act 2010.	
Positive impact + (Describe groups affected.)	Negative impact - (Describe groups affected.)

6. Impact – Fairer Scotland Duty

What impact will the policy, function or strategy have on reducing inequalities of outcome caused by socio-economic disadvantage?

Positive impact +	Neutral impact =	Negative impact -
	X	
Briefly describe how the policy, function or strategy will impact on reducing inequalities of outcome.		

7. Impact – Inverclyde Alliance Partnership Plan 2023/33

Which Themes from the Inverclyde Alliance Partnership Plan 2023/33 will the policy, function or strategy impact on?

<input type="checkbox"/>	Theme 1: Empowered people <ul style="list-style-type: none">Communities can have their voices heard, and influence the places and services that affect themGaps in outcomes linked to poverty are reduced
<input type="checkbox"/>	Theme 2: Working people <ul style="list-style-type: none">More people will be in sustained employment, with fair pay and conditionsPoverty related gaps are addressed, so young people can have the skills for learning, life and workBusinesses are supported and encouraged to reduce their carbon footprint and develop green jobs
<input type="checkbox"/>	Theme 3: Healthy people and places <ul style="list-style-type: none">People live longer and healthier livesSupportive systems are in place to prevent alcohol and drug misuse

	<ul style="list-style-type: none">• Our natural capital is looked after, and we are effectively adapting and mitigating the effects of climate change
<input type="checkbox"/>	Theme 4: A supportive place <ul style="list-style-type: none">• Vulnerable adults and children are protected and supported, ensuring they can live safely and independently• We recognise where people are affected by trauma, and respond in ways that prevent further harm and support recovery• Public protection and community safety are improved through targeting our resources to reduce the risk of offending and harm
<input type="checkbox"/>	Theme 5: A thriving place <ul style="list-style-type: none">• Growth in our working age population by encouraging people to stay here, and attracting new people to settle here• Development of strong community-based services that respond to local need• Homes are energy efficient and fuel poverty is reduced• Increased use of active travel and sustainable transport options• Easy access to attractive and safe public spaces, and high-quality arts and cultural opportunities
Briefly describe how the policy, function or strategy will impact on the Inverclyde Alliance Partnership Plan 2023/22 Themes.	

8. Impact – Council Plan 2023/28

Which Themes from the Council Plan 2023/28 will the policy, function or strategy impact on?

<input type="checkbox"/>	Theme 1: People <ul style="list-style-type: none">• Our young people have the best start in life through high quality support and education• Gaps in outcomes linked to poverty are reduced• People are supported to improve their health and wellbeing• More people will be in employment, with fair pay and conditions• Our most vulnerable families and residents are safeguarded and supported
<input type="checkbox"/>	Theme 2: Place <ul style="list-style-type: none">• Communities are thriving, growing and sustainable• Our strategic housing function is robust

Classification : Official

	<ul style="list-style-type: none">• Our economy and skills base are developed• We have a sufficient supply of business premises• Our natural environment is protected
X	Theme 3: Performance <ul style="list-style-type: none">• High quality and innovative services are provided, giving value for money• Our employees are supported and developed
Briefly describe how the policy, function or strategy will impact on the Council Plan 2023/28 Themes. <u>Theme 3:</u> The Unacceptable Actions Policy applies to all Council customer/services users and will support employees, consistent with the Council's zero tolerance approach to the abuse of employees.	

9. Evidence

What evidence do you have to help identify any potential impacts of the policy, function or strategy?

Note: Evidence could include information from consultations, surveys, the Citizens’ Panel, focus groups, interviews, projects, user feedback, complaints, Officers’ knowledge and experience, equalities monitoring data, publications, research, reports, and local and national groups.

Evidence	Details
Consultation/engagement (including any carried out while developing the policy, function or strategy)	The updated policy has been prepared in consultation with the CMT and the Information Governance Steering Group.
Research	The Unacceptable Actions Policy is a refreshed version of the policy which has been in place for 10 years, and no issues were identified in the operation of the policy in that time.

Classification : Official

	The policy is consistent with the best practice guidance provided by the Scottish Public Services Ombudsman.
Officers' knowledge and experience (including feedback from frontline staff)	The updated policy has been prepared in consultation with the CMT and the Information Governance Steering Group. The policy has been in place from 2015 onwards and no issues were identified in the operation of the policy in that time.
Equalities monitoring data	n/a
User feedback (including complaints)	n/a
Stakeholders Other	n/a
Are there information gaps and, if so, what are these?	n/a

10. Consequences of Analysis

What steps will you take in response to the findings of your analysis? Please select at least one of the following and provide a brief explanation.

a.	Continue development with no changes	<input checked="" type="checkbox"/>	Review and update of existing policy with no material issues having been highlighted. The policy will be reviewed on a five yearly basis and as required following any legislative or organisational changes.
b.	Continue development with minor alterations	<input type="checkbox"/>	

c.	Continue development with major changes	<input type="checkbox"/>	
d.	Discontinue development and consider alternatives (where relevant)	<input type="checkbox"/>	
<p>How will the effect of the policy, function or strategy be monitored following implementation?</p> <p>The application of the policy and implementation of restrictions will be continually reviewed during the timeframe of the policy.</p>			
<p>When is the policy, function or strategy due to be implemented?</p> <p>The policy has been in place since 2015. The updated policy will take effect once approved by Policy and Resources Committee at its meeting on 25 March 2025.</p>			
<p>When will the policy, function or strategy be reviewed?</p> <p>The policy is reviewed every five years and will therefore next be reviewed in 2030, unless there are organisational or other changes that require such a review to be conducted sooner.</p>			
<p>What resources are available for the implementation of the policy, function or strategy? Have these resources changed?</p> <p>The application of this policy and the implementation of restrictions will be contained within existing budgets.</p>			

11. Please use the space below to detail any other matters arising from the Equality Impact Assessment process, including what action could be taken to mitigate the impact of the policy, function or strategy.

Details of the Person(s) who completed the Assessment:	
Name:	Vicky Pollock
Position:	Legal Services Manager
Date:	3 March 2025
Authorised by:	
Name:	Louise Long
Position:	Chief Executive
Date:	5 March 2025

Please send a copy of the completed Template to Karen Barclay, Corporate Policy and Performance Officer at karen.barclay@inverclyde.gov.uk.