

Customer Access Review – Full Assessment

Assessment details		
Assessment area		Freedom of Information (FOIA) Procedures
Date of assessment		24 May 2016
Directorate and Service		Strategic Directorate (Internal Services) – Legal Services
Manager		Marie Kelly-Stone - Head of Legal Services
Officer conducting assessment		Marie Kelly-Stone - Head of Legal Services
Step 1: Scoping the assessment		
1	What are the aims and objectives of the activity or proposal?	The Council's Freedom of Information Procedures aims to set out the obligations of the Council to comply with the Freedom of Information Act 2000 (FOIA).
2	Who will be affected?	FOIA/EIR applicants.
3	How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?	Contributes to the Corporate Plan objectives: <ul style="list-style-type: none"> • “To deliver high quality services, offering value for money and demonstrating customer satisfaction and a culture of continuous improvement.” • “To inform and consult residents and stakeholders about Council services.”
4	Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?	Largely dictated by the legislation, including adopting a publication scheme based on the Information Commissioner's (ICO) model. Some discretion with the establishment of internal procedures.
Step 2: Information collection		
Note: Equality and Diversity information for Dartford can be found at http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/equality-and-diversity-data		
5	What do you know about the groups of people who will be affected? i.e. demographic information in relation to the protected characteristic groups (age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment)	A request for a Stage Two review of the decision and complaints are dealt with under the Council's Corporate Complaints Procedure. The Council collects and reports on equality information through the Corporate Complaints Procedure annual report.
6	What consultation has taken place with affected groups? Please describe who was consulted and the key findings	None

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7	Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?	No															
Step 3: Assessing the equality impact																	
8	Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the General Equality Duty: a) tackling unlawful discrimination b) promoting equality of opportunity c) promoting good relations <u>NOTES:</u> <ul style="list-style-type: none"> The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration For existing activities, consider how they are working in practice for each relevant protected group For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9 If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9 																
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;"></th> <th style="width: 30%;">POSITIVE IMPACTS</th> <th style="width: 30%;">NEGATIVE IMPACTS</th> <th style="width: 10%;">NO IMPACT</th> <th style="width: 10%;">UNKNOWN</th> </tr> </thead> <tbody> <tr> <td style="text-align: center; vertical-align: top;">a</td> <td style="padding: 5px;">Age Information not required</td> <td></td> <td style="text-align: center; vertical-align: middle;"><input type="checkbox"/></td> <td style="text-align: center; vertical-align: middle;"><input type="checkbox"/></td> </tr> <tr> <td style="text-align: center; vertical-align: top;">b</td> <td style="padding: 5px;">Disability The FOIA requires the application to be in writing, but the ICO guidance advises on ways of dealing with this where a disabled person finds it impossible or unreasonably difficult to make a written request. The Council makes a reasonable adjustment for applicants under the Equality Act 2010. This may include treating a verbal request for information as though it were a valid subject access request. The Council may also have to respond in a particular format which is accessible</td> <td></td> <td style="text-align: center; vertical-align: middle;"><input type="checkbox"/></td> <td style="text-align: center; vertical-align: middle;"><input type="checkbox"/></td> </tr> </tbody> </table>				POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN	a	Age Information not required		<input type="checkbox"/>	<input type="checkbox"/>	b	Disability The FOIA requires the application to be in writing, but the ICO guidance advises on ways of dealing with this where a disabled person finds it impossible or unreasonably difficult to make a written request. The Council makes a reasonable adjustment for applicants under the Equality Act 2010. This may include treating a verbal request for information as though it were a valid subject access request. The Council may also have to respond in a particular format which is accessible		<input type="checkbox"/>	<input type="checkbox"/>
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		to the disabled person, such as braille, large print, email or audio formats. The applicant may specify the format of the information, and the Council must deal with reasonable requests.			
c	Gender (including reassignment)	Gender neutral		<input type="checkbox"/>	<input type="checkbox"/>
d	Race	The FOIA leaflet features the translation strapline. Applicants can request information in different formats and the Council must comply with reasonable requests (a statutory requirement and referred to in the procedures).		<input type="checkbox"/>	<input type="checkbox"/>
e	Religion/Belief	Not applicable		<input type="checkbox"/>	<input type="checkbox"/>
f	Sexual Orientation	Not applicable		<input type="checkbox"/>	<input type="checkbox"/>
g	Pregnancy/Maternity	Not applicable		<input type="checkbox"/>	<input type="checkbox"/>
9	If 'no impact' or 'unknown' was selected, please explain				
10	If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups	Not applicable			
11	Any other comments	FOIA and EIR requirements are referred to in terms and conditions of contract between the Council and its partners/contractors. Non-discrimination provisions are referred to in contracts.			

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Step 4: Action plan

11. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:
 a) any gaps in information and consultation
 b) how any negative impacts on equality will be mitigated or eradicated

a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer

b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer

Step 5: Decision making and future monitoring

13	Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?	Management Team - Sarah Martin –Strategic Director (Internal Services)
14	How will you continue to monitor the impact of the activity or proposal on the equality groups?	Through the complaints process if and when a Stage Two review of the initial decision on a request is undertaken or a complaint is received.
15	When will you review this Customer Access Review?	Every three years

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Step 6: Final steps

16	Once this Customer Access Review has been approved, send this assessment to the Policy & Projects Officer
17	If the subject of the Customer Access Review is going to committee, summarise your findings in the committee report
18	Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded