

Customer Access Review – Full Assessment

Before completing this Full Assessment, please read the Guidance Note on Customer Access Reviews
Initial Screening is required before completion of a Full Assessment

Assessment details		
Assessment area		Freedom of Information (FOIA) and Environmental Information Regulations 2004 (EIR) Procedures
Date of assessment		6 November 2019: Reviewed 14.12.2022
Directorate and Service		Corporate Services – Legal Services
Manager		Head of Legal Services
Officer conducting assessment		Head of Legal Services
Step 1: Scoping the assessment		
1	What are the aims and objectives of the activity or proposal?	The Council’s FOI and EIR Procedures aim to set out the obligations of the Council to comply with the FOIA and EIR.
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?	<p>Contributes to the Corporate Plan objectives:</p> <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.” <p>The Council is subject to numerous legal duties relating to equalities e.g. race, disability, gender etc. The Council recognises and welcomes those duties, which are embraced in its Equality and Diversity Document Framework.</p> <ul style="list-style-type: none"> •
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.

Customer Access Review – Full Assessment

Step 2: Information collection

Note: Equality and Diversity information for Dartford can be found at <https://www.kent.gov.uk/about-the-council/information-and-data/facts-and-figures-about-Kent>

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
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	<p>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:</p> <p>a) tackling unlawful discrimination b) promoting equality of opportunity c) promoting good relations</p> <p><u>NOTES:</u></p> <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 				
		POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
a	Age	Information not required		<input type="checkbox"/>	<input type="checkbox"/>
b	Disability	The FOIA and EIR require the application to be in writing, but the		<input type="checkbox"/>	<input type="checkbox"/>

Customer Access Review – Full Assessment

		<p>ICO guidance advises on ways of dealing with this where a disabled person finds it impossible or unreasonably difficult to make a written request.</p> <p>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 to the disabled person, such as braille, large print, email or audio formats.</p> <p>The applicant may specify the format of the information, and the Council must deal with reasonable requests.</p>			
c	Gender (including reassignment)	Gender neutral		<input type="checkbox"/>	<input type="checkbox"/>
d	Race	The FOIA/EIR 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				

Customer Access Review – Full Assessment

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.

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

Customer Access Review – Full Assessment

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?	Chief Officer & Director of Corporate 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
Step 6: Final steps		
16	Once this Customer Access Review has been approved, send this assessment to the Community Development 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	