

SOUTH GLOUCESTERSHIRE COUNCIL



CUSTOMER INSIGHT

Guidance covering the personal information the Council collects, monitors, analyses and uses

Introduction

This document sets out South Gloucestershire Council's guidelines for collecting, monitoring, analysing and using customer data (customer insight).

The guidance covers the collection of equalities monitoring and other personal data relating to:-

- Customer feedback and complaints;
- Customer satisfaction surveys, consultation exercises and other research;
- Applications for services;
- Enquiries for services;
- Other contacts with the council.

It has been written to clarify why the Council collects customer data and assist officers in how to use the insight categories, and how to analyse and use the information collected.

Equality Responsibilities

Complying with The Equality Act 2010, including the Public Sector Equality Duty, Council Policy and the council's Equality Responsibilities (see below) will require the collection, monitoring, analysis and utilisation of customer data.

Equality

1. The Equality Act 2010 places a legal duty on the council to improve equality as a service provider and as an employer by:
 - a) Eliminating discrimination, harassment, and victimisation of individuals and groups on the basis of 'protected characteristics' (Age; Disability; Gender Reassignment; Pregnancy and Maternity; Race; Religion or Belief; Gender; Sexual Orientation; or Marriage / Civil Partnership);
 - b) Improving equality of opportunity between those who share protected characteristics and those who do not;
 - c) Fostering good relations between those who share protected characteristics and those who do not;
2. "Championing equality of opportunity for all" is clearly set out as one of the council's core values
3. The Council has a Corporate Equality and Diversity Policy which details our commitments and aims. We are committed to valuing and treating all people with dignity and respect. Our approach is three fold:-
 - a) To recognise that people, whether as communities or individuals, will have specific needs that need to be recognised and addressed in order for them to develop their full potential;
 - b) To acknowledge that the majority view is not always right and the rights of minorities will need to be protected;
 - c) To mainstream equalities into all aspects of our policy development and service delivery.

Management and Employee Duties

- 4. All employees, supervisors and managers are responsible for ensuring equality in their treatment of colleagues, service users and the public in their work and decision making. These responsibilities are stated in general terms in the council’s Equality Plan. This document describes in more detail the obligations depending on your role.
- 5. Overall, the equality management framework is based on the principle that the people responsible for controlling an aspect of work are responsible for ensuring that equality obligations are met as it is carried out.

Chief Officers Management Team
<ul style="list-style-type: none"> 6. The Chief Executive and Chief Officers Management Team (COMT) are responsible for the overall leadership and effective operation of the management of equality within the council. 7. In doing so they are supported by the Equality and Diversity Action Team (EDAT) which provides guidance and advice. 8. The Director of Environment and Community Services is the corporate champion for Equality and Diversity. This post holder provides internal and external leadership and raises equality issues at COMT.
Equality and Diversity Action Team (EDAT)
<ul style="list-style-type: none"> 9. The Equality and Diversity Action Team (EDAT) provides guidance and advice to COMT on the implementation of the council’s equality management framework, and on developments in the management of equality. 10. EDAT includes representatives from all departments of the Council and provides a network of good practice advice which can be called on by services and departments. 11. EDAT is also responsible for co-ordination of the council’s Equality Plan and its Annual Equality Report.
Directors and Departmental Management Teams
<ul style="list-style-type: none"> 12. Directors are responsible for ensuring the Council’s equality framework is effectively implemented across their department, and that Eq AAs are included as part of all Cabinet / officer reports.
Heads of Service
<ul style="list-style-type: none"> 13. Heads of Service are responsible for the equality performance of activities and premises under their control. This requires them to <ul style="list-style-type: none"> • Ensure that managers under their control are aware of their responsibilities and support them in meeting those responsibilities. • Ensure that people who manage and carry out work within their area are provided with suitable training, information, supervision and systems of work. • Ensure Eq AAs are included from the outset as part of policy development and review; and that Eq AAs are included as part of all decisions on changes to service. • Carry out Equality Impact Analysis and Assessments (Eq AAs) on a regular basis using performance measures and consultation results to identify imbalances in outcomes related to protected characteristics, and to implement changes to address these imbalances where appropriate.
Line managers
<ul style="list-style-type: none"> 14. Line Managers are responsible and accountable for ensuring equality both in the delivery of their service and in the management of their staff.
All staff
<ul style="list-style-type: none"> 15. All staff are responsible for championing equality within their work and delivery of services. 16. Achieving this will involve taking reasonable care to ensure there is no discrimination on the basis of protected characteristics in their delivery of services, or in their interaction with colleagues, partners, and the public.

The Purpose of Customer Insight

South Gloucestershire Council is committed to ensuring that it is operating fairly and equitably in service delivery. In order to put this commitment into practice, it is essential that we understand our customers and their needs so that we can respond appropriately and effectively. Understanding the needs of all our customer groups is a big step towards ensuring that our service delivery is appropriate and effective in meeting the needs of all our customers.

Customer Insight is not a bureaucratic data gathering exercise. Collecting and monitoring customer data will enable us to:-

- Find out which customer groups are using our services and how satisfied they are with them – this will enable us to identify and make changes which enhance our services where necessary;
- Ensure that our services can be easily accessed by all customer groups;
- Target our services to customer groups;
- Determine whether we are offering equality of opportunity, access and treatment to all groups in the provision of services;
- Find out if our equalities policies are effective and highlight areas where our policies need to be changed in order to offer greater equality of opportunity, access and treatment;
- Use real data and evidence to inform changes rather than risk relying on assumptions;
- Use real data and evidence to inform our Equality Impact Assessment and Analysis work rather than risk relying on assumptions;
- Improve our reputation as a fair provider of goods or services;
- Evidence that we know who our users and non users are and that we have found out what their needs are.

The usefulness of the data we collect can be increased if all services consistently collect and monitor the same data fields.

It is important that customer insight is used to understand any significant differences or gaps that exist for all customer groups and that this understanding is used to inform our practices (including our Equality Impact Assessment and Analysis) and the actions we take.

What Data Should be Collected?

The Equality Framework for Local Government makes the collection, monitoring, analysis and usage of a number of customer data categories mandatory.

The Public Sector Equality Duty also requires that we collect, monitor, analyse and use customer equalities data and information.

We need to ensure that we are consistent in the questions we ask and the categories we use so that the data we collect can be used effectively. There are minimum standards for the data that need to be collected.

Mandatory categories:-

- **Age group**
- **Gender**
- **Disability**
- **Ethnic Group**

We must also ask **geography** (preferably postcode, but at least ward) if we are to effectively interpret the information.

Optional categories that will be used by service areas where it is considered relevant:-

- **Religion or belief**
- **Sexual orientation**
- **Transgender**

Other optional categories:-

- Nationality (e.g. Polish, Irish)
- First language
- Household type (e.g. owned outright, buying on mortgage, rented)
- Combined household income
- Relationship status (e.g. married, single)
- Career status (e.g. in employment, retired, student)
- Employment status / occupation (e.g. managers, professional, skilled trade)
- Preferred method of communication / contact (e.g. post, email, phone)

Questions and categories are included in Appendix 1.

Wherever possible we should use the Office for National Statistics classifications to enable comparison with wider data sets. For more information see www.statistics.gov.uk.

It is worthwhile noting that we also work with our partner organisations, such as the police and NHS, to align categories used.

When Should Data Be Collected?

There clearly needs to be a balance between the work involved in collecting the data and what it is used for; so a degree of common sense is needed from managers around what is collected. For instance, it would be virtually impossible to collect and monitor the customer data of all South Gloucestershire residents who pay Council Tax or have their bins collected, so it may be easier to monitor enquiries or complaints about the service and then compare these with the South Gloucestershire profile.

Customer Insight questions should be asked for **all**:-

- Customer feedback and complaints;
- Customer satisfaction surveys, consultation exercises and other research;
- Applications for services.

Customer Insight questions should also be asked of a **sample of** customers contacting the council with an enquiry or other contact. However, managers may decide that this should be done through enclosing equalities questionnaires with regular customer satisfaction surveys.

Managers can decide that for a specific service it is not appropriate to ask all of these Customer Insight questions. However, managers will be required to explain their reasoning for including or not including certain categories.

In terms of the optional questions, services need to consider what is relevant and what the information will inform. Services can obtain advice from their Departmental / Divisional Equalities Representatives, the Corporate Equalities Team or the Corporate Research & Consultation Team.

How Should Data Be Collected?

Sometimes people do not wish to share information about themselves. We must accept this, but we should explain to people why we ask for this. The questions which are likely to be the most sensitive are disability, religion/belief, sexual orientation and transgender.

The quality of the data relies on individuals personally answering the questions so staff should never prompt or attempt to classify people themselves.

All the questions covering personal data should be included either at the end of the form / questionnaire or as a separate sheet. Depending on the nature of the service some teams may wish to ensure confidentiality by including a separate envelope for its return. However, this approach means that valuable information about differences in service take up or satisfaction levels etc. could be overlooked so care must be taken.

Data should be based on the standard categories set out in Appendix 1. However, it is up to individual services whether they include all the categories on the form / questionnaire, or whether they instead provide a free text box which staff then code to the standard categories when it is received in the office. If the former option is chosen then each pick list must include the option of 'prefer not to say'.

All Customer Insight questions must be labelled as optional.

We must be clear about how the data will be used and shared, so there must be a security and confidentiality statement. This should include:-

- That the data will be solely used for measuring the performance of local services and planning future services;
- That the data will only be used by the local authority (and where applicable partner organisation involved in the delivery of local services¹);
- That the data will be confidential or anonymous (unless the law requires the disclosure of this information);
- Contact details for an officer based on the service area who could answer further queries.

Example text is included in Appendix 2.

If people are aware that the data is used in order to **improve our services for all customer groups** they may be more likely to feel comfortable in responding.

How Should Data be Stored?

The Data Protection Act 1998 requires sensitive information to be stored in a secure manner where access to the information is restricted to named officers.

Personal data should always be used properly. It should be used for research only, and not to make decisions about individuals.

Information should always be held in confidence unless the law specifically requires the information to be disclosed, e.g. through freedom of information (FOI).

¹ Where information is shared with partners a list of these partner organisations must be publicised on the public website www.southglos.gov.uk

The LGA / IDeA / National Consumer Council's Customer Insight Protocol advises that law does not prevent local authorities from:-

- Holding personal details in connection with survey results (e.g. date of birth);
- Holding data for long periods of time;
- Using data for a number of purposes;
- Sharing data between agencies.

However, it advises that these activities must be done in adherence with the key principles of:-

- Transparency – customers need to understand how the data will be used; and
- Consent – respondents must consent for the data to be used in this way.

It is good practice for the data collected to be saved securely and a new dataset produced with the minimum personal data (e.g. anonymised with date of birth changed into age bands etc). Services should also allocate a small number of 'data custodians'. These staff will be the only people who see the original (rather than the anonymised) data.

There is a facility within our Customer Relationship Management (CRM) system to hold customer information which in the long term should prevent customers repeatedly being asked the same personal questions, so further work will be undertaken to consider whether this is a suitable option for storing the original data.

What do I do With the Results?

It is important that Customer Insight is used to inform practices so if one group is not found to figure well in statistics, action should be taken to understand why.

Key questions for services include:-

- What will the information be compared with?
- How will the information be analysed?
- How will the results be published?
- How will the data feed into service improvements?
- How will outcomes be measured?

The results can be cross referenced with other service information, for instance:-

- Take up of services
- Satisfaction levels
- Outcomes
- Complaints and compliments
- Applications for services
- Successful applications
- Numbers of people accessing services / information
- Funding levels
- Consultation responses

Small differences between these results and the service information are to be expected and can be put down to chance. Significant differences and those which continue over time will need further analysis.

Collection of data is not the end, but is the start of a process where the information that has been collected is proactively evaluated and analysed so that improvements and developments in service provision can be identified.

Overall, this approach can be seen as a three-step process as follows:

1. Collect data
2. Analyse data (analysis may include consultation)
3. Plan and implement service improvements as a result of data collection and analysis

Collect Data

Customer Insight provides full details of how equalities monitoring information should be collected. Key principles include:

1. Use the exact monitoring categories shown within Appendix 1, always ensuring that you include the option “*prefer not to say*”. **Note:-** in the few instances where you need to reduce the number of categories used within your monitoring activity, contact the Equalities Officers for guidance.
2. Mandatory categories used for monitoring are the areas of Age, Sex, Race and Disability. The use of additional monitoring categories such as Religion or Belief, Sexual Orientation and Gender Reassignment should be used where there is clear, identified rationale for their usage – the rationale you have developed for using these additional monitoring categories should be agreed with your service manager and Equalities Officers.
3. When collecting data, customers should always be clearly informed of the reasons why you are asking for this information and how it will be used. Examples of statements that can be used to inform customers of reasons why we ask these questions are shown in Appendix 2.

Analyse Data

Data is collected in respect of a number of key service information areas such as take up of services, satisfaction levels, complaints and compliments, applications for services, successful applications, numbers of people accessing services/information, funding levels, consultation responses. These service information areas should be reviewed and analysed in respect of equalities categories and considerations.

When analysing the equalities data you have collected, you should consider the following:-

- What is your sample size. Is this large enough to give reliable results?
- Are there any groups for whom data does not exist? Does this mean that these groups are unaware of your service or are not confident to access your service? Consider methods that you may adopt to promote your service specifically to these groups.
- Are there any groups for whom data shows a low level or high level of take-up or satisfaction? What is considered to be low and high levels of take-up/satisfaction will depend upon factors such as:
 - What are your own service area expectations for service take-up/satisfaction amongst diverse groups?
 - How do levels of take-up/satisfaction compare with other service areas delivering comparable activities?
 - How do levels of take-up/satisfaction compare with similar services delivered by other Local Authorities, partners and organisations?
 - How do levels of take-up/satisfaction compare with population estimates of diverse groups in South Gloucestershire?
- Have you received any feedback (e.g informal, verbal, written etc.) that identifies equalities gaps or barriers that need to be considered?
- Data collected will need to be cross-referenced with data that you have collected historically in order to identify emerging trends. Trends should be analysed in order to identify reasons for this e.g. a higher number of people from the Chinese group has been identified recently and this is due to promotional activity which the service area has conducted.

If you identify a need to improve any of your results in respect of any equalities groups, consultation should be conducted. This can commence with contacting the Equalities Officers for guidance.

You should inform others of your data and a route for doing this is via your Departmental Equalities Working Group.

Plan and Implement Improvements

Equality Impact Assessment and Analysis is itself an equalities analysis tool. The form used by the council is the main vehicle which should be used to evidence your formal analysis of equalities data. Your data should be fed into the form which will then guide you through the process of analysing positive, negative and neutral impact in respect of equalities groups. The action planning element of the form should be used to identify activity which you will deliver in order to address the issues emerging from your analysis.

Further Support and Information

- Equalities Officers: equalities@southglos.gov.uk
- Corporate Research & Consultation Team: consultation@southglos.gov.uk
- [Equality Measurement Framework](#)
- [Measuring Customer Satisfaction Guidance](#)
- [Consultation Toolkit](#)
- [Equality Impact Assessment and Analysis guidance and forms](#)

Service areas will be expected to report annually on how they are doing compared to the South Gloucestershire profile (see ProfilePoint <http://intranet/content/ceandcr/sections/profilepoint/> and the [Equality Measurement Framework](#)).

In presenting data, care should be taken to ensure that individuals are not easily identified. For example, you should not show educational attainment data where a single pupil in the year is from a particular diversity group. Where necessary small numbers can be replaced by a hash symbol (#).

In the longer term the data we collect will allow us to more effectively involve the community in setting our targets.

References

LGA / IDeA / National Consumer Council – Customer Insight Protocol
<http://www.lga.gov.uk/lga/aio/37749>

Bath & North East Somerset Council, Equalities Monitoring Guidance

London Borough of Barnet, Diversity Monitoring Guidance

Appendix 1: Standard Questions and Categories

Good practice is to list alphabetically, not to put the most common first, with 'Other' and 'prefer not to say' options last.

Age

Wherever possible age bands should be used instead of date of birth.
Age bands should be in line with Census categories.

The following categories should be used by all services as a minimum:

- Under 18
- 19 - 24
- 25 – 44
- 45 - 64
- 65 - 74
- Over 75
- Prefer not to say

Services can add additional age bands as required e.g. 75-84, 85-94, over 95

Ethnic Origin

(based on the ethnicity questions used in the 2011 census)

- Arab
- Asian/Asian British – Bangladeshi
- Asian/Asian British – Indian
- Asian/Asian British – Pakistani
- Asian/Asian British – Chinese
- Asian/Asian British – Other (please state)
- Black/African/Caribbean/Black British – African
- Black/African/Caribbean/Black British – Caribbean
- Black/African/Caribbean/Black British – Other (please state)
- Gypsy or Traveller of Irish Heritage
- Mixed/Multiple Ethnic Groups – White & Asian
- Mixed/Multiple Ethnic Groups – White & Black African
- Mixed/Multiple Ethnic Groups – White & Black Caribbean
- Mixed/Multiple Ethnic Groups – Other (please state)
- White – English/Welsh/Scottish/Northern Irish/British
- White – Irish
- White – Other (please state)
- Other ethnic group (please state)
- Prefer not to say

Gender

- Female
- Male
- Other
- Prefer not to say

Disability

Do you consider yourself to be disabled?

No	
Prefer not to say	
Yes - Physical impairment, such as difficulty using arms or mobility issues which may mean using a wheelchair or crutches	
Yes - Sensory impairment, such as being blind / having a serious visual impairment or being deaf / have a serious hearing impairment	
Yes - Mental health condition, such as depression, anxiety or schizophrenia	
Yes - Learning disability/difficulty (such as Down's Syndrome, dyslexia, dyspraxia) or cognitive impairment (such as autistic spectrum disorder)	
Yes - Long standing illness or health condition, such as cancer, HIV, diabetes, chronic heart disease or epilepsy	
Yes - Other (please state)	

If yes, please tell us how this affects the way that you access or use council services.

Sexual Orientation

(USED BY SERVICE AREAS WHERE DEEMED TO BE RELEVANT, I.E. A CLEAR RATIONALE FOR ASKING THIS QUESTION HAS BEEN IDENTIFIED)

- Bisexual
- Gay man
- Gay woman / lesbian
- Heterosexual
- Other
- Prefer not to say

Religion / belief

(USED BY SERVICE AREAS WHERE DEEMED TO BE RELEVANT, I.E. A CLEAR RATIONALE FOR ASKING THIS QUESTION HAS BEEN IDENTIFIED)

- Buddhist
- Christian
- Hindu
- Jewish
- Muslim
- Sikh
- Any other religion (please state)
- No religion
- Prefer not to say

Transgender

(USED BY SERVICE AREAS WHERE DEEMED TO BE RELEVANT, I.E. A CLEAR RATIONALE FOR ASKING THIS QUESTION HAS BEEN IDENTIFIED)

Do you identify as a transgender person?

Yes

No

Prefer not to say

Employment status

Use National Standard Occupational Classification 2000 (SOC-2000)

(www.statistics.gov.uk)

Appendix 2: Standard Text Examples about the Use of Data

“...By answering the following questions you will help us ensure we give a good and fair service to everyone. Your answers will be treated as confidential...”

“...South Gloucestershire Council would like to reassure you that your comments and suggestions remain strictly confidential...”

“...Your answers will be treated in the strictest confidence and will only be used to monitor the local authority’s services...”

“...All responses will remain confidential, however, if you would like to take part in our prize draw then please make sure you include your contact details at the end of the questionnaire...”

“...Please detach your answers from the main form and include in the separate envelope...”

“...We will use your comments to help improve our understanding of needs, improve our services and raise our standards. All your answers will be treated in the strictest confidence and will only be used to monitor and help improve the Council’s services...”

“...Data will be used for statistical purposes and may be shared with departments across the council to help improve our services...”

“...Anonymised data may be passed to local authority partners to enable regional patterns to be studied...”

“...No third party will use your details for any other market research purpose such as direct mailings...”

“...Monitoring data enables us to identify how we could potentially improve our services to you in the future...”

“...I would like to ask you some further questions to help us to monitor and improve our services, however you do not need to answer them if you prefer not to...”

“...Some of these questions may feel a little personal, but the information we collect is confidential / anonymous and can not be traced back to you...”

“...If you would like any further information about how we use this data please contact on 01454 86xxxx...”

“...The council believes it is important to understand the different types of communities who use our services and it is only by asking you these questions that we can be confident we are meeting your needs...”

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