



Equality & Diversity Impact Assessment (EIA)

The aim of the EIA is to assess the equality implications of a policy, practice or service on people in possession of protected characteristics under The Equality Act 2010. By conducting this EIA, Bridgewater Housing Association strives to:

- Eliminate unlawful discrimination, harassment and victimisation.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

By considering these elements, we are doing our best to ensure none of our people serve to experience adverse consequences to our policy, practice or service in the course of their involvement with Bridgewater Housing Association. This assessment therefore records the likely impact of any changes by anticipating the consequences and making sure that positive impacts are maximised, with any negative impacts being eliminated or minimised.

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| What policy/practice/service does the EIA assess? | Customer Engagement Strategy for 2023-2026 | Is this a new policy/practice/service or a revision to an existing? | Revision to Tenant Participation Strategy and Policy 2018 |
| Person(s) responsible for carrying out the EIA | Drafting: Ruth Brogan, Head of Housing Services and finalising: Leadership Team | Date of EIA | 31 st January 2024 |

| A: INITIAL SCREENING | |
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| <p>1. <u>What</u> are the aims, objectives and purpose of the policy/practice/service?</p> | <p>The Strategy sets out the framework for how Bridgewater will work with its customers over the next three years to ensure they can influence and be involved in decisions about Bridgewater’s direction and services. This framework provides Bridgewater with a range of tools to allow its customers to engage with the Association in different ways, which will allow Bridgewater to be responsive to their needs by adapting their products and services to suit.</p> <p>Bridgewater as a social housing landlord must comply with the Scottish Social Housing Charter and, the Scottish Housing Regulator framework, including ensuring that the performance measures and action plan within the Customer Engagement Strategy is developed with customers and kept under review.</p> <p>Customers will be engaged and consulted on in relation to the following:</p> <ul style="list-style-type: none"> • Significant changes to policy and service standards affecting the Association’s main services. • Changes to agreements with customers. • Planned or cyclical works programmes. • Procurement of the most significant services and contractor. • Changes to the Customer Engagement Strategy. • Local issues affecting tenants and residents. • Standard setting and monitoring around performance. • Measuring performance against the Scottish Social Housing Charter standards. |
| <p>2. <u>Who</u> is intended to benefit from the policy/practice/service? (e.g. staff, members, tenants, contractors)</p> | <p>Bridgewater’s customers, which mostly comprises tenants and owners to whom Bridgewater provides a factoring service, but also housing applicants, leaseholders, Care and Repairs service to owners in mixed tenure estates where Bridgewater manages scheme repairs and other Registered Tenant Organisations. .</p> |
| <p>3. <u>How</u> do we hope people will benefit from this policy/practice/service?</p> | <p>Customers are intended to benefit from the strategy by being consulted and involved in decision-making, which will lead to Bridgewater’s services being better informed and meeting customers’ needs more.</p> |

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| | <p>The initial draft revised policy mainly updated dates, more information on the business plan, expands the benefits of delivering change and improvements, widens the use of technology (i.e. improved website, video conferencing software where appropriate),</p> <p>By customers themselves being consulted on decisions and organisational direction, considerations can arise which Bridgewater may otherwise have missed, which can remove barriers and disadvantages to particular groups as a result of them having been engaged with.</p> <p>As a by-product, Bridgewater as an organisation, as well as its staff, will benefit from providing a higher quality, more responsive service to its customers (better reputation, improved culture, meeting its targets and achieving its wider business plan).</p> |
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4. Which protected characteristics could be affected (positively or negatively) by the policy/proposal/report? (x) tick all that apply

| | |
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| Age <input checked="" type="checkbox"/> | Disability <input checked="" type="checkbox"/> |
| Gender Reassignment <input checked="" type="checkbox"/> | Marriage/Civil Partnership <input checked="" type="checkbox"/> |
| Pregnancy/Maternity <input checked="" type="checkbox"/> | Race <input checked="" type="checkbox"/> |
| Religion or Belief <input checked="" type="checkbox"/> | Sex <input checked="" type="checkbox"/> |
| Sexual Orientation <input checked="" type="checkbox"/> | |

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| 5. If the policy/practice/service is not relevant to any of the characteristics listed in section 4, state why and end the process here. | n/a |
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B. FULL SCREENING don't know

6. What *internal* data or research has been used in conducting this EIA?

(e.g. performance data, workforce demographics, service user feedback, etc.)

Quantitative data:

Bridgewater have a range of diversity information which is available from our records and held in our Housing Management System for all those customers receiving housing management services. Anonymised equalities information has recently started to be collated using Housing Online Portal, this includes information on age, gender, ethnicity, sexual orientation, and disability. The range of information is limited in relation to certain characteristics (e.g., sexual orientation).

Qualitative data

In 2022 a Tenant Satisfaction Survey was carried out by an independent researcher between the 30th August and 25th September 2022. 343 interviews were carried out with tenants and produced the following statistics on satisfaction with the service opportunities to participate and language or communication preferences, ethnic origin and disabilities. The data showed that:

Age and gender

Just over 1 in 3 tenants were aged 65 and over (38%), 43% were aged 35-64 and 19% were aged 16-34. More respondents were female (58%) than male (42%).

| Q43 What is your age group? | | |
|-------------------------------------|-----------|----------|
| Base: All respondents, n=343 | No | % |
| 16-24 | 5 | 1.5% |
| 25-34 | 60 | 17.5% |
| 35-44 | 55 | 16.0% |
| 45-54 | 49 | 14.3% |
| 55-64 | 43 | 12.5% |
| 65-74 | 78 | 22.7% |

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| 75-84 | 45 | 13.1% |
| 85+ | 8 | 2.3% |

Disability and long term health problems

Over half of respondents (57%) said either they or a member of their household had a long term health condition or disability.

Ethnicity

The vast majority of tenants (95%) identified as White Scottish. A full breakdown of the ethnic origin of respondents is shown in the table below:

| Q46 What is your ethnic group? | | |
|--|-----|-------|
| Base: All respondents, n=343 | No | % |
| White Scottish | 327 | 95.3% |
| White English | 5 | 1.5% |
| White Irish | 2 | 0.6% |
| Polish | 2 | 0.6% |
| Pakistani, Pakistani Scottish or Pakistani British | 1 | 0.3% |
| Other, please write in: | 2 | 0.6% |
| Prefer not to say | 4 | 1.2% |

Overview of satisfaction

- In terms of overall satisfaction, 93% of respondents said they were very or fairly satisfied with the overall service provided by Bridgewater which is in line with the 2019 results (94%).
- Almost all respondents (97%) were of the opinion that the Association is very or fairly good at keeping tenants informed about their services and decisions. This is not significantly different from the overall satisfaction value in 2019 (95%).
- The vast majority of respondents (92%) were very or fairly satisfied with the opportunities provided to them to participate in Bridgewater's decision making processes which is up from 83% in 2019.

Communication and Participation

Analysis by age reveals that younger respondents were more likely to prefer digital communications such as social media, email, contact through the website or app and text messaging. Older respondents aged 65 and over were most likely to prefer to be kept updated via letters and postcards (83%).

| Q4 Bridgewater use a range of methods to keep their tenants informed about their services and decisions. In which of these ways would you prefer to be kept informed? | | | | |
|--|--------------|--------------|--------------|------------|
| | 16-34 | 35-54 | 55-74 | 75+ |
| Base | 65 | 104 | 121 | 53 |
| Newsletters | 75% | 74% | 84% | 79% |
| Letters / Postcards | 63% | 59% | 68% | 83% |
| Social Media | 9% | 5% | 2% | - |
| Website / App | 15% | 14% | 3% | - |
| Email | 17% | 16% | 5% | - |
| Text Message | 12% | 6% | 2% | 2% |
| Telephone | - | 3% | 7% | 8% |

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| Video Calls e.g., Near Me or Facetime? | - | - | - | - |
| Other | - | - | 2% | 11% |

Two thirds of tenants (67%) were aware of at least one way they could get involved in Bridgewater Housing Association's decision making processes. Tenants were most likely to be aware they can read and comment on the newsletter (38%), become a member of the Association and attend the AGM (37%) and become a member of the Board (23%). 33% of tenants were not aware of any of the ways they can get involved which is an increase on the 2019 results (16%).

Q7 Were you aware that you could get involved in Bridgewater Housing Association's decision-making processes in any of the following ways?

Base: All respondents, n=343

| | No | % |
|--|-----|-------|
| Read and comment on our newsletter | 130 | 37.9% |
| Become a member of the Association and attend the AGM | 126 | 36.7% |
| Become a member of the Board | 80 | 23.3% |
| Respond to the annual rent setting survey | 68 | 19.8% |
| Participate in telephone or online surveys | 55 | 16.0% |
| Being part of a Focus Group | 30 | 8.7% |
| Visit our Web Site and post questions | 23 | 6.7% |
| Comment on the report on the Scottish Social Housing Charter | 12 | 3.5% |
| Get involved in mystery shopping | 5 | 1.5% |
| None | 112 | 32.7% |

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Analysis by age shows that tenants aged 16-34 were most likely to say they weren't aware of any of the ways they can get involved (40%) and tenants aged 55-74 were least likely to be unaware (26%).

Q7 Were you aware that you could get involved in Bridgewater Housing Association's decision-making processes in any of the following ways? READ OUT LIST AND SELECT ALL THAT APPLY.

| | 16-34 | 35-54 | 55-74 | 75+ |
|--|-----------|------------|------------|-----------|
| Base | 65 | 104 | 121 | 53 |
| Read and comment on our newsletter | 32% | 25% | 50% | 42% |
| Respond to the annual rent setting survey | 17% | 21% | 24% | 11% |
| Get involved in mystery shopping | 2% | 2% | 1% | 0.02 |
| Become a member of the Association and attend the AGM | 29% | 34% | 42% | 0.4 |
| Become a member of the Board | 11% | 19% | 29% | 0.34 |
| Visit our Web Site and post questions | 5% | 9% | 7% | 4% |
| Comment on the report on the Scottish Social Housing Charter | 5% | 4% | 3% | 2% |
| Participate in telephone or online surveys | 20% | 15% | 16% | 13% |
| Being part of a Focus Group | 8% | 8% | 8% | 13% |
| None | 40% | 37% | 26% | 30% |

Bridgewater want to build a list of tenants to consult with on matters that are of interest to them. This could be a Focus group who meet in person, or it could be informal telephone or email conversations. Just 4% of

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tenants (14 individuals) expressed an interest and of these individuals, half said they would prefer to participate by attending meetings in person or remotely.

| Q11 If yes, how would you prefer to be consulted | | |
|--|----|-------|
| Base: would like to join tenants list, n=14 | No | % |
| Attending meetings in person or remotely | 7 | 50.0% |
| Telephone consultation | 2 | 14.3% |
| Email consultation | 2 | 14.3% |
| A dedicated webpage for consultations | - | - |
| A combination of the above | 3 | 21.4% |

7. What *external* data or research has been used in conducting this EIA?

(e.g. national surveys, external reports, benchmarking, etc.)

Quantitative data:

Benchmarking our results from the 2022 Tenant Satisfaction Survey with a comparison against the average of other RSL's performance in the SHR Annual Return on the Charter shows high satisfaction levels for the Association.

| Scottish Housing Regulator indicators (Tenants only) | | | | | |
|--|------|------|------|------|-------------|
| | 2013 | 2016 | 2019 | 2022 | ARC 2021/22 |
| Taking everything into account, how satisfied or dissatisfied are you with the overall service provided by Bridgewater Housing Association? (% very/ fairly satisfied) | 89% | 98% | 94% | 93% | 88% |
| How good or poor do you feel Bridgewater is at keeping you informed about their services and decisions? (%very good/ fairly good) | 92% | 100% | 95% | 97% | 91% |

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| How satisfied or dissatisfied are you with the opportunities given to you to participate in Bridgewater decision making process? (% very/ fairly satisfied) | 70% | 98% | 83% | 92% | 87% |
|---|-----|-----|-----|-----|-----|

The Department for Levelling Up, Housing and Communities (DLUHC residents survey¹, 2022 found that satisfaction levels were notably highest among:

- Older residents aged 65-74 (74%) and 75 and over (83%)
- Men (70% compared with 65% of women)
- White residents (69%) compared with 57% of ethnic minority residents (excluding white minorities)

Dissatisfaction was higher than average among those:

- Aged between 25 and 54 (22%)
- Ethnic minority residents (excluding white minorities (25%))

Interesting male residents and shared owners were more likely to participate in several activities and despite lower levels of satisfaction so too were ethnic minorities.

Scottish Housing Regulator, Tenant Participation and Digital Access Report 2019²– 93% indicated that they have access to the internet at home and nearly all of those that responded use the internet (98%). However, there were concerns about privacy and security or/and prefer to do things at over the phone. A small number indicated that they struggle to use digital options due to poor health or sensory impairment. Some do not use digital services this may include Gypsy/Travellers and those that are homeless.

Qualitative data: The ‘Responsible’ Tenant and the Problem of Apathy, McKee, 2009 -

In this paper the research describes that tenant focus groups explained apathy was down to a lack of available transport and inconvenient meeting times; the cost and availability of childcare; a lack of awareness of the opportunities available to them; and perceived cliques within formal participation structures.

¹ [SHQP Residents Survey Report \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

² [national-panel-of-tenants-and-service-users-year-6-tenant-participation-and-digital-access-august-2019.pdf \(housingregulator.gov.scot\)](https://www.housingregulator.gov.scot/national-panel-of-tenants-and-service-users-year-6-tenant-participation-and-digital-access-august-2019.pdf)

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| | <p>Scottish Social Housing Charter Outcome 3: Participation - <i>Social landlords manage their businesses so that tenants and other customers find it easy to participate in and influence their landlord's decisions at a level they feel comfortable with.</i></p> |
| <p>8. What positive impacts might the policy/practice/service have on the groups identified in part 4?</p> | <p>All protected characteristic groups:</p> <p>The Strategy provides key mechanisms for engagement such as:</p> <ul style="list-style-type: none"> • Customer Experience Panel/ Scrutiny Team • Independent Tenant Satisfaction Survey • E-Consultation Register • Ongoing Service Satisfaction Surveys and Questionnaires • Service Review Groups • Tenants' Conferences and Public Events • Estate Inspections • Registered Tenants Organisations (RTOs) • Informal Community Groups • Community Partnership Meetings and Community Councils • Newsletters • Review of Complaints • Areas for Development • Mystery Shopping • Tenant Led Inspections • Giving Feedback <p>By having such a variety of means by which customers can engage with the Association, there are more opportunities for customers from protected characteristic groups to raise issues which could affect them. This way, Bridgewater is not only able to be more <i>responsive</i> to any issues raised by customers from protected characteristic groups, but is able to identify and <i>anticipate</i> potential barriers, risks and also <i>positive opportunities</i> on an ongoing basis, allowing the Association to address these proactively rather than reactively.</p> |

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Social Housing providers also must contend with customers who have a tendency to over report satisfaction. Many social housing tenants are grateful for the safe and affordable housing they receive and are anxious not to rock the boat. This lulls organisations into a false sense of security and perpetuates wasteful, poor quality service practice. Having a breadth of engagement options may help ensure that customer satisfaction is not under-reported, especially for protected characteristic groups.

Currently in place is a Code of Conduct for Staff, Contractors and for Board Members. The Associations Unacceptable Behaviour Policy advises customers of what is acceptable behaviour and what is not acceptable when communicating with our staff.

The document is in Arial 12, a universally acceptable font (however, please note below re negative impacts). It is written in plain English.

In terms of General Duties under the Public Sector Equality Duties this strategy helps:

- a) Eliminate discrimination
- b) Advance equality of opportunities
- c) Foster good relations

The document makes relevant reference to the law and statutory standards. Signposting to the Association’s complaints handling procedure provides an explanation of appeals and complaints.

The strategy clearly outlines the performance monitoring that will measure the effectiveness in 7.4.

9. What negative impacts might the policy/proposal/report have on the groups identified in part 4? How might these impacts be removed or minimised?

| Issue Identified | Recommendation | Agreed action | Responsibility and Timeframe |
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| <p>While under 5.5.2, it states that Customers will be offered information in the appropriate format where requested (e.g., Braille, large print, audio, and in other languages), the strategy does not state availability of these at the front of the document, instead stating this at the end, which may be superfluous.</p> | <p>Consider moving 5.5.2 and 12.1 to the front page, i.e. <i>“This document can also be provided in large print, braille, audio or other non-written format and in a variety of languages, on request”</i></p> | <p><i>Bridgewater to review Text moved to page 1 of document. Recommendation accepted</i></p> | <p>HoHS 27/02/24</p> |
| <p>Under 5.5.2, it states: “When arranging meetings, we will consider the different needs of different customers and endeavour to meet them. We will assist customers by providing signers and interpreters for meetings on request and will ensure that all venues are fully accessible. We will consider the timing of meetings or providing crèche facilities to assist parents or working tenants to attend”.</p> <p>However, in line with the ‘Responsible Tenant and Apathy’ findings, it fails to mention careful consideration of the timing of engagement activities to ensure, as reasonably as is practicable, that people’s religious observances and beliefs are not compromised. It is also unclear if travel assistance is provided.</p> | <p>Add: “There will also be careful consideration of the timing of engagement activities to ensure, as reasonably as is practicable, that people’s religious observances and beliefs are not compromised”.</p> <p>Review any insertion about travel assistance e.g. in exceptional circumstances travel assistance to in person engagement events may be paid but prior approval must be obtained from [Bridgewater to insert]</p> <p>Review employees’ awareness of how to access interpreters where English is not the first language.</p> | <p><i>Bridgewater to review Recommendation accepted</i></p> <p><i>Bridgewater to review, text added to Section 5.5.2 Recommendation accepted</i></p> <p><i>Bridgewater to review Recommendation accepted</i></p> | <p>HoHS 27/02/24</p> <p>HoHS 27/02/24</p> <p>HoHS Ongoing</p> |
| <p>While there is a Codes of Conduct in place, there is no reference within these documents to behaviour expected when formally engaging with customers.</p> | <p>Add link to these Codes and Policies to the front page.</p> | <p><i>Bridgewater to review. Customer Service Standards included Appendix 2 Recommendation accepted</i></p> | <p>HoHS 27/02/24</p> |
| <p>Under 6.3, estate inspections may impact people with a disability.</p> | <p>Ensure that walkabouts are accessible for all customers wishing to engage with</p> | <p><i>Bridgewater to review. Include in review of Estate Management</i></p> | <p>HoHS – Aug 24</p> |

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| | Bridgewater via this engagement process and look to make reasonable adjustments. | <i>Policy Recommendation accepted</i> | |
| 3.11 Digital accessibility. | Ensure, if they ask, that the Strategy and/or involvement is available in a different format and a revision to the wording to say that feedback from those that do not utilise technology will be combined with the digital feedback. | <i>Bridgewater to review. Additional text added to 3.11 Recommendation accepted</i> | HoHS 27/02/24 |
| 2.6.2 “[We will] encourage involvement of all customers regardless of age gender, race, religion, marital status, political or sexual orientation or disability or any other characteristic.” This statement does not include all the protected characteristics under the Equality Act 2010. | Ensure this statement includes the 9 protected characteristics, which are: age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. Ensure this revised wording is also reflected in other relevant policies and documentation across the organisation as they are introduced/come up for renewal. Consider whether appropriate to state “any other characteristic” e.g. only involve those with blue eyes | <i>Bridgewater to review. Text amended at 2.6.2 detailing the 9 protected characteristics. Recommendation accepted</i> <i>Bridgewater to review. Text amended at 2.6.2 detailing the 9 protected characteristics. Recommendation accepted</i> <i>Bridgewater to review. Text amended at 2.6.2 detailing the 9 protected characteristics Reference to “any other characteristics” deleted. Recommendation accepted</i> | HoHS 27/02/24 Leadership Team Ongoing HoHS 27/02/24 |
| 4.5 The strategy misses an opportunity to acknowledge you recognise customer needs | Consider updating strategy under 4.5 to include that you will undertake equality | <i>Bridgewater to review. Text added at 4.5</i> | HoHS 27/02/24 |

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| and as a result promote equality of opportunity. | monitoring to understand in more detail the equality related demographics of your tenants and other key stakeholders so that services can be more closely attuned and responsive to specific needs of people from different PC groups | <i>Recommendation accepted</i> | |
| 5.1 lists when customers are consulted and engaged but may miss other opportunities when minority groups may be disadvantaged such as when introducing a new initiative, policy, procedure etc. | Consider wording revision re Bridgewater may also decide to consult and engage with customers on other key areas such as new initiatives particularly if there may be potential impacts on minority groups or It is touched on briefly in Action 3 of your Equalities Strategy, so might be worth making more explicit in there and then referring to that strategy within this strategy instead or expand 5.5.1 (note a typo with a dot missing on the strategy i.e. 5.51) | <i>Bridgewater to review. Text added at 5 .1 Recommendation accepted</i> | HoHS 27/02/24 |
| 6.3 defines membership of Service Review Groups but fails to mention minority groups or proactively fostering good relations across groups | Consider adding additional wording | <i>Bridgewater to review. Text added at 6.3 Recommendation accepted</i> | HoHS 27/02/24 |

C. NEXT STEPS

**10. What is the decision on the policy/practice/service?
(i.e. no change, amend, cease, progress with risk – in which case add to risk monitor if applicable)**

External consultant's recommendation: amend based on recommendations above.

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| <p>11. Where will the EIA be published?</p> <p>Bridgewater has published the Strategy on MyBHA portal and website and issued to all staff members for feedback and input.</p> <p>Consider wording, e.g. “[insert job title] conducted an EIA on [date] in relation to [insert policy/practice/service], and was satisfied there is no associated negative impact on people from protected characteristic groups. [if applicable] this will be reviewed [insert timeframe].”</p> | <p>MyBHA portal and Bridgewater website www.bridgewaterha.org.uk</p> <p>Ruth Brogan, Head of Housing Services conducted an EIA on 27/02/24 in relation to the Customer Engagement Strategy and was satisfied there is no associated negative impact on people from protected characteristic groups.</p> |
| <p>Review date (if applicable)</p> | <p>3 years</p> |



Signed:

Date: 27/02/24

Job title: Head of Housing Services

