



## Equality Impact Assessment (EIA) – Compensation Policy

| Activity being assessed                                                       | Compensation Policy                                                                                                                                     |                                                                                |
|-------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| Purpose of activity being assessed                                            | Outlines our approach to providing compensation in a fair, consistent and proportionate way and in line with the Housing Ombudsman’s remedies guidance. |                                                                                |
| Lead officer                                                                  | Nicola Bucklan , Customer Resolution and Service Improvement Manager                                                                                    |                                                                                |
| EIA completed by<br>(colleagues involved in completing EIA with lead officer) | Completed by: Customer Resolution &Service Improvement Manager                                                                                          | Reviewed / amendments suggested by: Place Shaping & Customer Influence Manager |
| Date EIA completed                                                            | 29/09/25                                                                                                                                                |                                                                                |

### Data used in preparing EIA

| Data used                                                     | Insight obtained and associated considerations                                                                                     |
|---------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|
| <ul style="list-style-type: none"><li>Service users</li></ul> | Consultation survey sent to 643 customers who’ve previously been awarded compensation .There were 26 respondents                   |
| <ul style="list-style-type: none"><li>Uptake data</li></ul>   | Review of current approaches around compensation – benchmarked and due consideration of HOS remedies guidance to ensure compliance |



|                                                |                                                                                                                   |
|------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|
| • Service satisfaction data                    | TSM data, The leadership factor survey results and transactional survey                                           |
| • Complaints and compliments about the service | Complaints escalated to Stage 2 due to seeking additional compensation (total of 19 over 3 months)                |
| • Survey of customers/colleagues               | Co – creation – survey of 26 customers to gain feedback round accessibility, clarity, wording and ease of process |
| • Focus group                                  | n/a                                                                                                               |
| • Written responses to policy                  | Customer survey responses                                                                                         |
| • Other - please list source                   | Best practice approaches within housing sector. Housing Ombudsman requirements under Remedies Guide               |

## Data gaps

| Info needed                                                                     | Notes                                                                                                                  |
|---------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| Insufficient data available regarding accessibility for full range of customers | Existing VIVID data will require refreshing to enable this gap analysis<br>Will develop policy in formats to meet need |

## Outline who this activity affects

| Affected groups                  | Yes/No |
|----------------------------------|--------|
| Customers                        | Yes    |
| Residents within wider community | Yes    |
| Involved customers               | Yes    |



|                             |                                  |
|-----------------------------|----------------------------------|
| Landlord employees / agents | Yes                              |
| VIVID colleagues            | Yes                              |
| Others – please list        | MPs , councillors ,third parties |

### Potential impact on protected characteristics

| Protected Characteristic | Summary of potential impacts                                                                                                                                                                                                                                                                                                                                               |                                                                                                          |
|--------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| Age                      | Positive Impact                                                                                                                                                                                                                                                                                                                                                            | Negative Impact                                                                                          |
|                          | Neutral impact                                                                                                                                                                                                                                                                                                                                                             |                                                                                                          |
| Disability               | <b>Positive Impact</b><br>Customers do not need to request compensation for it be awarded when service failure identified as handlers adhere to HOS remedies guide<br>Reassurance throughout the complaint journey could provide assurance to those customers with mental health challenges. e.g. allay anxiety , provide reassurance<br>Tone of voice communication style | <b>Negative Impact</b><br>Process may not be accessible in written format – alternative formats required |
|                          | Neutral impact                                                                                                                                                                                                                                                                                                                                                             |                                                                                                          |



|                     |                                                                     |                 |
|---------------------|---------------------------------------------------------------------|-----------------|
| Race                | Positive Impact<br>Key documentation can be translated where needed | Negative Impact |
|                     | Neutral Impact                                                      |                 |
| Religion or Belief  | Positive Impact                                                     | Negative Impact |
|                     | Neutral Impact                                                      |                 |
| Sex                 | Positive Impact                                                     | Negative Impact |
|                     | Neutral Impact                                                      |                 |
| Sexual orientation  | Positive Impact                                                     | Negative Impact |
|                     | Neutral Impact                                                      |                 |
| Gender reassignment | Positive Impact                                                     | Negative Impact |



|                               |                            |                 |
|-------------------------------|----------------------------|-----------------|
|                               | Neutral Impact             |                 |
| Marriage or Civil Partnership | Positive Impact            | Negative Impact |
|                               | Neutral Impact             |                 |
| Pregnancy and Maternity       | Positive Impact            | Negative Impact |
|                               | Neutral Impact             |                 |
|                               | Actions to Mitigate Impact |                 |



### Additional characteristics to consider

|                       |                                                                                                                                                                                                                                    |                 |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| Literacy              | Positive impact<br>Compensation awarded when service failure identified. Customers are not required to process a 'claim'                                                                                                           |                 |
|                       | Neutral impact                                                                                                                                                                                                                     |                 |
| Socio economic status | Positive impact<br>recompense can be used to offset any arears customer arrears to enable tenancy sustainment<br>Complaint handlers can call customer back if needed to avoid use of limited data allowance within phone contracts | Negative impact |
|                       | Neutral impact                                                                                                                                                                                                                     |                 |

**General** – all customers are able to ask for third party to act on their behalf when seeking remedies to complaints, concerns ref service delivery – permission to discuss, authority to disclose, Clear commitment from VIVID to work with relevant/ specialist support agencies to enable effective resolution of customers concerns / complaints



## Consultations

| Consultation completed (what, when, outcome)                    | Consultation needed (what, when due) |
|-----------------------------------------------------------------|--------------------------------------|
| With customers: August 2025                                     | With customers: complete             |
| With colleagues: Circulated to all operational managers Sept 25 | With colleagues: complete            |

## Mitigating negative impacts

|                                                                                                           |                                                                                                                                                                                         |
|-----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Outline actions being undertaken to mitigate any potential or actual negative impact identified           | Create alternative formats                                                                                                                                                              |
| Identify any further action that could be undertaken to mitigate any potential or actual negative impacts | Promote policy on VIVID website, through Knowledge articles and training so any member of staff can answer customer queries. Highlight changes, ensure equality aspects are understood. |

## Result of EIA

| Tick 1                              | Possible Outcomes                                                                                                                                                                                  |
|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/>            | <b>No change needed:</b> there's no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.                                                         |
| <input checked="" type="checkbox"/> | <b>Adjust the approach*:</b> EIA has identified problems and the project will be amended to ensure these problems are mitigated. Policy to be created in alternate formats to ensure accessibility |



|                          |                                                                                                                                                                                                                                                 |
|--------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input type="checkbox"/> | <b>Continue the policy:</b> there's a potential for the policy to adversely impact some groups or help some groups more than others. However, the reasons for this can be well justified and the policy will be implemented without amendments. |
| <input type="checkbox"/> | <b>Remove the policy:</b> EIA shows that the policy is having a discriminatory effect and should be stopped immediately.                                                                                                                        |

## Continual Monitoring

### Potential triggers for early review:

Failure to raise complaints when dissatisfaction identified

Failure to ask if there are reasonable adjustments required for complaint investigation

Housing Ombudsman requirements (e.g Remedies Guidance Spotlight reports, best practice, Centre for learning, Orders, recommendations)

Ongoing commitments to develop and embed best practice

Customer feedback through the delivery of the Customer influence strategy and associated delivery plan

Customer feedback via transactional survey

EIA approved by: Head of Customer Experience

Date approved: 02 October 2025