



Equality Impact Assessment (EIA)

Activity being assessed	Speak Up Policy	
Purpose of activity being assessed	Review and update of the Speak Up Policy	
Lead officer	Lauren Ricketts, Risk and Assurance Manager	
EIA completed by (colleagues involved in completing EIA with lead officer)	Completed by: Lauren Ricketts	Reviewed / amendments suggested by: Duncan Short
Date EIA completed	05 May 2026	

Data used in preparing EIA

Data used	Insight obtained and associated considerations
Service users	No direct service user data was analysed, as the policy relates to internal reporting arrangements rather than service delivery. Potential impacts on customers were considered through the scope of the policy and links to our Complaints and Safeguarding processes.



• Uptake data	Previous Speak Up reporting trends and volumes were considered at a high level to understand typical use of the policy and the importance of clarity and accessibility.
• Service satisfaction data	Not directly applicable, as this policy does not relate to satisfaction with a specific service
• Complaints and compliments about the service	Consideration given to how concerns raised by customers and other stakeholders are appropriately routed between Speak Up, Complaints and Safeguarding processes.
• Survey of customers/colleagues	No specific surveys undertaken for this update. The changes focus on clarity and accessibility rather than altering underlying processes
• Focus groups	N/A
• Written responses to policy	N/A
• Other - please list source	The update was informed by the Economic Crime and Corporate Transparency Act 2023 (ECCTA) and associated Government guidance on “failure to prevent fraud”, as well as existing whistleblowing good practice

Data gaps

Info needed	Notes
N/A	



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	Yes

Potential impact on protected characteristics

Protected Characteristic	Summary of potential impacts	
Age	Positive Impact Clearer, plain English examples and multiple reporting routes support confidence to speak up across all age groups, including younger colleagues or older residents who may otherwise be unsure how to raise concerns	Negative Impact None identified
	Neutral impact The policy applies equally regardless of age and does not restrict access based on age	
Disability	Positive Impact Multiple reporting routes (manager, senior contact, independent and external routes)	Negative Impact None identified



	provide flexibility for people with physical, sensory, cognitive or mental health conditions Confidential and non-confrontational routes may support individuals who find direct reporting challenging	
	Neutral impact The policy does not impose requirements that would disadvantage disabled individuals	
Race	Positive Impact - Explicit inclusion of bullying, harassment and discrimination supports early reporting of race-related concerns. - Independent reporting options can increase confidence for individuals who may fear bias or lack of understanding.	Negative Impact None identified
	Neutral Impact The policy treats all concerns consistently, regardless of race or ethnicity	
Religion or Belief	Positive Impact - Provides a safe route to raise concerns about inappropriate behaviour, pressure, or unfair treatment linked to religion or belief. - Confidential handling supports those worried about visibility or stigma	Negative Impact None identified



	Neutral Impact The policy does not differentiate based on belief	
Sex	Positive Impact Clear pathways to raise concerns about harassment, discrimination or inappropriate behaviour may particularly support individuals who face gender-based barriers to reporting	Negative Impact None identified
	Neutral Impact The policy applies equally to all sexes	
Sexual orientation	Positive Impact - Inclusion of harassment and discrimination as examples of when to speak up supports early escalation of concerns related to sexual orientation. - Independent reporting routes may increase confidence for those concerned about disclosure	Negative Impact None identified
	Neutral Impact The policy is inclusive and does not create differential treatment	
Gender reassignment	Positive Impact The policy explicitly supports reporting of discrimination, bullying and pressure to act	Negative Impact None identified



	against values, which may benefit people with protected gender identities. Confidential and independent routes reduce fear of negative consequences	
	Neutral Impact The policy is inclusive and does not create differential treatment	
Marriage or Civil Partnership	Positive Impact No specific differential impact identified; the policy provides equal protection and access	Negative Impact None identified
	Neutral Impact The policy is not related to marital or partnership status	
Pregnancy and Maternity	Positive Impact A supportive speak-up culture and multiple reporting routes may help individuals raise concerns about pressure, treatment or safety issues during pregnancy or maternity	Negative Impact None identified
	Neutral Impact The policy does not place additional requirements on individuals during pregnancy or maternity	



Actions to Mitigate Impact

No adverse impacts on protected characteristics have been identified. The policy update is expected to have a neutral to positive impact, supporting inclusion, early reporting and protection for all groups



Additional characteristics to consider

Literacy	Positive impact - The policy has been updated to use clearer, more practical language and recognisable examples, which can help people with lower literacy levels or those who are less confident with formal policy wording understand when and how to speak up. - Multiple verbal reporting routes reduce reliance on written communication	Negative impact None identified
	Neutral impact The policy does not require written submissions; concerns can be raised verbally or through trusted contacts	
Socio economic status	Positive impact - Confidential and independent reporting routes may particularly benefit individuals who feel less empowered to raise concerns due to their role, employment status, financial dependence, or position within the organisation or supply chain. - The ability to speak up without proof or certainty supports early escalation regardless of seniority or status	Negative impact None identified
	Neutral impact Access to Speak Up routes is not restricted by employment grade, contract type or financial circumstances	



Consultations

Consultation completed (what, when, outcome)	Consultation needed (what, when due)
With customers: N/A	With customers: N/A
With colleagues: No formal consultation has been undertaken as part of this policy update. The policy will continue to be reviewed through ongoing monitoring of Speak Up activity and feedback	With colleagues: We may consider engaging with colleagues in the future to confirm that reporting routes are understood, accessible and operating as intended

Mitigating negative impacts

Outline actions being undertaken to mitigate any potential or actual negative impact identified	
Identify any further action that could be undertaken to mitigate any potential or actual negative impacts	No significant negative impacts have been identified. We will however • Undertake internal comms to raise awareness and to reinforce confidence in Speak Up arrangements and clarify reporting routes • Consider future engagement with colleagues to test awareness and understanding of Speak Up routes and identify any perceived barriers to reporting. • Regularly review the policy to ensure it remains accessible, proportionate and effective, with updates made where lessons are learned or risks change.



Result of EIA

Tick 1	Possible Outcomes
☒	No change needed: there's no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.
☐	Adjust the approach*: EIA has identified problems and the project will be amended to ensure these problems are mitigated.*** as outlined above as recommendations in line with our corporate commitment to embed best practice throughout our service delivery
☐	Continue the policy: 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.
☐	Remove the policy: EIA shows that the policy is having a discriminatory effect and should be stopped immediately.

Continual Monitoring

Potential triggers for early review: Feedback/lessons learnt from Speak Up cases

EIA approved by: Sarah Phillips

Date approved: May 2026

Final copy of EIA emailed to Natalie Pearton on: May 2026