



Equality Impact Assessment (EIA) Form

Please refer to the Equality Impact Assessment Guidance when completing this form.

Step 1 – Overview	
Policy Name	Repair and Maintenance Policy
Policy Lead	David Wells Executive Director of Customer Experience
Policy Author	Emma Humphries Regional Director
Equality Impact Assessment completed by	Karen Bushell, Stacey Owens, Andy Green, Jon Coomer, Joanne Webb, Kathryn Spittle, Michael Parr, Craig Bishop, Shandy Price, Sophie Hadley, Paula Steen, Mandy Parkinson, Adrian Rawlings, Kevin Davies, Colin Pritchard, Darren Kynaston, James Cooper, Nicholas Phillips, Chloe Meredith, Carol Roe, Colette Simonczyk, Peter Dugdale, Norah Ward, Jon Evans, Emma Wells
Has an EIA previously been completed? If so when?	Yes – LWrekin: January 2024
Date EIA commenced	28 th April 2026
Date EIA completed	28 th April 2026
Briefly describe the aims, objectives and purpose of the policy	
The Repair and Maintenance Policy sets out the Group’s responsibility and commitment to providing homes that are safe and well maintained. It also sets out customers responsibilities in maintaining and looking after our homes. The policy ensures compliance with the Regulatory Consumer Home Standard.	
Why is this EIA being completed?	
The policy is being reviewed to bring together a new HPG approach to repairs and maintenance.	
Who does the policy affect?	
The policy affects all Housing Plus Group customers who live in our properties. It also applies to all staff who deliver the repair and maintenance service to customers.	

Step 2 – Screening

Indicate whether you have identified a people impact

<p>Yes Progress to step three</p>	<p>X</p>	<p>No Explain in the box below why there is no people impact and progress to step six</p>
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Explain why there is no people impact

- *Briefly describe why there is no people impact.*
- *For example, ‘the policy has no people impact as it focuses solely on summarising the regulatory, legal and governmental approach to xx which must be complied with.’*

Step 3 – Research and Impact Assessment

EIA Team Meeting

Present	Karen Bushell, Stacey Owens, Andy Green, Jon Coomer, Joanne Webb, Kathryn Spittle, Michael Parr, Craig Bishop, Shandy Price, Sophie Hadley, Paula Steen, Mandy Parkinson, Adrian Rawlings, Kevin Davies, Colin Pritchard, Darren Kynaston, James Cooper, Nicholas Phillips, Chloe Meredith, Carol Roe, Colette Simonczyk, Peter Dugdale, Norah Ward, Jon Evans, Emma Wells	Date of Meeting(s)	28 th April 2026
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Consider the available data

1. What existing sources of equality information (quantitative and qualitative) will you use to help you assess / mitigate the likely effect on different protected groups of people?
This could be profiling information and data / feedback from customers / complaints made and lessons learnt / statistical data / results of staff and customer surveys / inspection reports / anecdotal feedback
2. What equality information gaps have you identified and how will you fill them?
3. What research / consultation / engagement is required and what has already been carried out?

Consider the potential or actual impact of the policy on each of the 9 protected characteristics

<p>Protected Characteristic Refer to the EIA Guidance for definitions and descriptions.</p>	<p>Summary of Impact Outline the actual or potential impact associated with the policy. Is the impact positive or negative?</p>	<p>Mitigation If a negative impact, how will this be mitigated?</p>
<p>Age</p>	<p>The Repair and Maintenance Policy has a positive impact regardless of an individual's age.</p>	<p>The procedures and processes in place for reporting a repair are not limited to new technology and traditional approaches for reporting repairs are still maintained. HPG will support customers to report repairs and access the service in the way that is appropriate for them.</p>
<p>Disability</p>	<p>We need to ensure that we give tenants enough time to answer the door when attending a repair – especially in Retirement Living and ALD Schemes.</p> <p>If we are unable to complete an effective repair to a key fixture or fitting, we must consider whether this could have a negative impact on someone with a disability.</p>	<p>Notifications have been added to Cadre where tenants require additional time to answer the door. A generic notification will be delivered on a operatives hand held device advising if a tenant needs additional time to answer the door, is hard of hearing, or has vulnerabilities that require extra time. It was acknowledged that this will not include all vulnerabilities — only those relevant to access requirements, such as needing additional time or being hard of hearing.</p> <p>Repairs should always be left safe, even if they cannot be resolved during the visit. As all repairs will be delivered as part of the same-day service, this helps mitigate any immediate risk and repairs are prioritised appropriately for all individuals. If we attend a repair that requires a component replacement or a full replacement, we may not be able to complete the full</p>

	<p>Negative impacts should be considered in situations such as wet room installations, where the work may take 2–3 days to complete. We need to ensure we remain at the forefront of supporting customers and that alternative accommodation is provided when needed.</p>	<p>installation during that visit. However, we must, and do, ensure that the property is made safe and remains as usable as possible until the permanent repair can be completed. The repair will then be referred into the planned works programme.</p> <p>The Repairs Teams work closely with the Housing Executive (HE) to make sure appropriate arrangements are in place. Where works are expected to last longer or have a greater impact on the customer, we may need to provide appropriate temporary accommodation. We have access to a Travelodge account to provide temporary accommodation and we also have ShireLiving guest bedrooms available for customers to stay in, although these may not suit the needs of all customers – for example, they are not always on the ground floor so accessibility could be a problem. We also need to remain conscious of the needs of residents already living within the schemes. The Temporary Move Policy and Procedure is currently in the process of being reviewed.</p> <p>The Retirement Living Team are also in the process of creating a 'catalogue' of all guest bedrooms across the schemes. This will include the facilities in each room, accessibility information and a standardised entry procedure for out of hours. The catalogue will be made available to the regions once ready.</p>
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	<p>We need to work closely with contractors and ensure relevant information is shared appropriately, particularly where disabilities or specific needs need to be considered. Communication is key. One example discussed involved a neurodiverse household, where contractor visits had to be carefully planned so they did not overlap with the daughter's routine due to her specific needs.</p> <p>When carrying out repairs in one flat within a block, we need to be conscious that the work could trigger or negatively affect someone else living nearby who may be neurodivergent, suffer from poor mental health or have PTSD. Noise is one example that could have a significant impact on someone with PTSD or other sensitivities. Where extensive works are taking place in a flat, consideration should also be given to other residents within the block and wider community impacts. Customer support should not only focus on the individual property affected, but also on neighbouring residents where appropriate. This also applies to sub-contractors, who need to be aware of these considerations and the importance of communication and customer service throughout the works.</p> <p>There was discussion about ensuring that the same level of customer care is delivered when works are completed by contractors and sub-contractors and it was acknowledged that this was an area where improvement was needed.</p>	<p>Work is underway with the Procurement Team to improve how sub-contractors are managed. A new process is being developed where all sub-contractors will operate through a central portal. This will allow KPIs to be measured consistently, improve oversight and enable customer satisfaction feedback to be logged and monitored.</p>
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	<p>The current roadmap outlines that we let customers know if we are running late, but there was a query about what would happen if a tradesperson was due to arrive earlier than stated and whether customers would be notified of this before they attended the property. A complaint had been received recently where a tradesperson had attended the home of a neurodiverse individual early and this had caused significant distress as the customer was not ready or prepared for the visit. This highlighted the importance of including communication around both early and late arrivals and it was recognised that arriving early can also create problems for customers.</p>	<p>The Customer Contact Centre currently manage this process by contacting customers if operatives are running early or late, and text messages are also sent where possible. However, it was acknowledged that not all customers have mobile phones, so this approach may not always be effective. Adrian Rawlings agreed to take this feedback on board when reviewing and developing future roadmaps, including updating the current version.</p> <p>It was commented that communal doors in Retirement Living Schemes should not be carded. Any examples of cards being posted through communal doors, should be passed to the Customer Manager (Operations), as these would not reach the customer.</p> <p>Over the next 12 months, as Awaab's Law phases 2 and 3 are introduced, our approach to damp and mould will continue to develop. This will include asking customers whether they have any characteristics or circumstances that mean we need to respond more quickly or complete follow-on works within shorter timescales. Our same-day service already ensures we respond quickly in the first instance, but we are now moving into a period where we also need to consider these factors when planning and completing follow-on works, as well as for all repairs. This will be an important consideration for the future due to the potential impact on</p>
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		<p>customers due their characteristics or temporary circumstances.</p> <p>By law, we have to make reasonable adjustments for anyone with a disability and we are bound by this in statute</p>
Gender Reassignment	<p>It is important that customer facing staff are aware of how customers identify and what their preferred name is so to avoid inadvertently offending anyone.</p>	<p>This information is available within Cadre and should be clearly recorded so that it is available as part of the jobs that are delivered to operatives through their handheld devices.</p> <p>As part of completing in-house stock condition surveys and the wider data cleaning and validation exercise, David Hall has developed three EDI questions for customers to be asked. These focus on preferred names, additional vulnerabilities and any other information that may need updating or amending. The Customer Voice and Value Team are supporting this with the intention for this to be implemented during Q1 2026/27. The Team are also going to continue work on Cadre Icons and Vulnerability Markers.</p>
Marriage and Civil Partnership	<p>No negative impact identified.</p>	
Pregnancy and Maternity	<p>Vulnerabilities can be temporary and pregnant women may be at higher risk from damp and mould.</p>	<p>When damp and mould is reported, customers are asked whether anyone in the household is pregnant. This allows us to better understand how we should respond and manage issues at the property. When we are made aware of a pregnancy, assuming the pregnancy progresses well, an enhanced approach to managing damp and mould will need to be taken in that property</p>

		<p>for the next five years due to their being a child under the age of five living there.</p> <p>There was discussion around adding time limited vulnerabilities to Cadre, something that the Retirement Living Team had previously requested. Examples included temporary circumstances such as being pregnant, oxygen users, long-term hospital stays or respite care. In these situations, reminders would need to be set — for example, after six months — so that flags can be reviewed and removed where appropriate. Kathryn Spittle agreed to follow up with IT about the progress in this function being available within Cadre.</p>
Race	No impact identified.	
Religion or Belief	<p>Some female tenants may not be able to be alone in the property with a male operative due to religious or cultural reasons. At the moment, this could be difficult for the repairs service to accommodate because of the lack of female operatives.</p> <p>Consideration should also be given to holiday periods also need consideration. During Ramadan customers may be fasting and while they may not mind operative eating or drinking in their home during this time, staff need to be mindful and the appointment time should be considered. Prayer times can also affect appointments and we need to offer flexible times to suit an individual's needs.</p>	<p>A female member of staff from the Housing Team can also attend a property where a repair is taking place to ensure that the service is still delivered to a female customer.</p> <p>The repairs service operates 8am – 8pm so a later appointment time can be arranged to accommodate this. When customers call us to report a repair, we aim to attend and complete this on the same day. However, if a customer would prefer a future appointment, we will accommodate this and provide a time and date that is suitable.</p>
Sex	No negative impact identified.	Gender must not be assumed by name or how somebody sounds on the phone. If gender is mistaken by any member of staff, an apology

		must be offered, demonstrating how we treat individuals with respect.
Sexual Orientation	No negative impact identified.	
<p>Socio-Economic Groups If you have identified any other groups of people that could be affected, provide the detail here.</p> <p><i>For example, this could include socio economic status, caring responsibilities, ex-forces, those who have experienced the care system or who have been 'looked after' etc</i></p> <p><i>Also consider other 'vulnerabilities' or life factors that an individual may be facing at any one time. For example – grief, financial distress etc.</i></p>	<p>Where repairs are rechargeable, we must consider the impact of this on those who are experiencing financial hardship.</p> <p>The repairs service must be flexible and tailored to all customers needs.</p>	Manageable Payment Plans will be offered and arranged.

<p>Safeguarding Issues: In the review of this policy are there any considerations that need to be made from an EDI perspective with regards to safeguarding issues, modern slavery, domestic abuse?</p>	<p>A trades operative might be the first person from the organisation who has been in to a home for a long time so they have a key role in being mindful and vigilant for safeguarding concerns. This needs to be reinforced in the policy and procedure documents.</p> <p>Repeat repairs could indicate underlying issues within a household. The Tenancy Insight Model is being reviewed which shows repair repairs and interactions.</p>	<p>This applies to all staff who enter a customers home. All staff need to be supported to raise concerns and understand when and how to do so. If a member of staff raises a concern, it should be fed back to them what the result was without breaching confidentiality or data protection.</p> <p>It was confirmed that the concerns alert button had been updated to also include concerns about Child to Parent Abuse. Front line staff</p>
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	<p>It is important that confidentiality is maintained at all times. The example was given around the use of cameras / video recordings of works completed in a property. Photos within the household should not inadvertently be captured in these (the example was given a fostered / adopted child who had been removed from their parents for safeguarding reasons).</p>	<p>must have the right training to be able to identify potential issues and report these appropriately.</p> <p>The Group is exploring the use of video technology to support the repairs service and this point would be taken away to ensure it is built in to policies, processes and procedures in order to reduce this risk and ensure that all operatives are aware of their responsibilities under GDPR.</p> <p>We must ensure that the training delivered to staff is applied in practice and implemented across the organisation. Examples of following the right processes when entering a tenants home were provided – showing ID badges, introducing themselves by name etc. Referring to the early conversation about an operative attending an appointment early – while they may view this as a positive, this could have a negative impact on an individual with poor mental health or who suffers from anxiety. It was acknowledged that as service re-alignment is completed, there will be an opportunity to ensure that all staff follow the same processes and deliver the same level of consistently good service. It was also commented that spot checks / audits could be completed. This would be reflected in the road map (showing badges etc on arrival). The policy will reflect that we will listen to customer feedback and constantly make adjustments to the service for those who need them.</p>
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		We need to ensure that we ‘close the loop’ and trades are provided with feedback after they have raised a concerns alert. This feedback is also provided at the Locality Boards.
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<p>Access to Services</p> <p>Are there any considerations that need to be accounted for in respect of accessing this service? Are there any barriers?</p> <p>Do any reasonable adjustments need to be made for any of the protected characteristics?</p>	<p>Non-verbal customers would be unable to report an emergency repair out of hours through the contact centre which would reduce their access to the service and create barriers.</p> <p>Individual circumstances can change in a day (the example of a stroke was provided). We need to ensure we have the right data and that information on Cadre is up to date. Every opportunity to capture data should be taken – whether it be through calls or when repairs / stock condition surveys are completed at a property.</p>	<p>It was queried whether a chatbot / live chat could be used in this instance. If a non-verbal customer was to email us out of hours, this wouldn’t get picked up until 8am the following morning meaning that the service would not be accessible in an emergency situation. In the absence of a live chat option for OOH, LHPG can currently provide an email address for the OOH service for non-verbal customers. The use of assistive technology outside of the 8-8 service should be explored along with other potential measures that could be introduced. It will be important to reference in the policy that we seek to resolve challenges presented by any individual with specific needs.</p> <p>It was agreed that focus should not only be on recording vulnerabilities on Cadre, but also clearly identifying what service adjustments are required. Simply adding information into the system is not always enough if staff do not understand what it means in practice when delivering services.</p>
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Step 4 – Action Plan			
Action	Responsibility	Timeframe	Comments

<p>If an operative is going to arrive early to a repair's appointment, ensure that the same process is followed as when an operative is running late. Build this in to the policy and associated procedures and ensure this is reflected on the road map and communicated with staff.</p>	<p>Adrian Rawlings – Operational Services Manager</p>		
<p>Follow up required with the ICT Team about time limited vulnerabilities being added to Cadre.</p>	<p>Kathryn Spittle – Team Leader: Retirement Living</p>		
<p>When exploring the use of video technology to support repairs, ensure that all data protection, confidentiality and GDPR considerations are accounted for. Build these in to the policy, procedures and processes and ensure they are communicated with staff.</p>	<p>Adrian Rawlings – Operational Services Manager / Jo Webb – Legal Services Manager</p>		
<p>We must ensure that the training delivered to staff is applied in practice and implemented across the organisation. Process to be introduced / strengthened to ensure that policies and procedures are being delivered in practice.</p>	<p>Learning & Development Team – in conjunction with the direct leads for the relevant service area.</p>		
<p>Explore the use of a chatbot / live chat / appropriate solution for customers who are non-verbal and unable to report an emergency over the phone outside of the 8-8 service.</p>	<p>Adrian Rawlings – Operational Services Manager</p>		
<p>Ensure that the policy demonstrates our commitment to resolve any barriers to a</p>	<p>Colette Simonczyk – Operational Services</p>		

customer being able to access the repairs service.	Manager / Emma Wells – Head of Risk and Assurance		
Step 5 – Making a judgement			
Having considered the potential or actual impact and the action plan, indicate what action you intend to take.			
Option 1 - no change	The assessment demonstrates that the policy is robust and there is no potential for discrimination or negative impact. All opportunities to promote equality are being taken.		
Option 2 - adjust the policy	The assessment identifies potential negative impact or missed opportunities. Remove or adjust certain aspects or introduce mitigating actions to reduce the impact.		X
Option 3 – remove the policy	The policy shows actual or potential unlawful discrimination. It must be stopped and removed or significantly changed. Document the removal of any significant changes in the Action Plan.		
Step 6 – Approval and Housekeeping			
This assessment was approved by:			
Name	<To be completed by the Direct Lead of the Policy>		
Job title			
Contact number			
Policy Control Sheet - date of EIA updated	Yes / No		
Copy of EIA forwarded to Risk and Policy Team	Yes / No		

