

Appendix B



Equality Impact Assessment [version 2.12]

Title: Annual Complaints Report 2023/2024	
<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Jordan Crawford
Service Area: Housing and Landlord Service	Lead Officer role: Service Development Manager

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

This is the Bristol City Council Landlord Service ‘Complaints Performance and Service Improvement Report’, provided to the Homes and Hosing Delivery Policy Committee Chair, in line with requirements set out in the Housing Ombudsman Complaint Handling

Under section 8.1 of the Housing Ombudsman Complaint Handling Code (the Code), Bristol City Council (BCC), in its role as a social housing landlord, must produce an ‘Annual Complaints Performance and Service Improvement Report’ for scrutiny and challenge, which must include:

- a. an annual self-assessment against the Housing Ombudsman Code to ensure our complaint handling policy remains in line with their requirements.
- b. a qualitative and quantitative analysis of our complaint handling performance, which must include a summary of the types of complaints we have refused to accept.
- c. any findings of non-compliance with the Code by the Ombudsman.
- d. the service improvements made as a result of the learning from complaints.
- e. any annual report about the landlord’s performance from the Ombudsman; and
- f. any other relevant reports or publications produced by the Ombudsman in relation to the work of the landlord.

In addition, section 8.2 of the Code states that the annual complaints performance and service improvement report must be reported to the landlord’s governing body (or equivalent) and published on the on the section of its website relating to complaints. The governing body’s response to the report must be published alongside this.

This report provides complaints performance by the landlord service between April 2023 – March 2024.

1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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While the report itself does not have any adverse impacts on protected characteristics, this EqIA has identified potential impacts on the process of a making a complaint and these have been considered in this EqIA

Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: [How we measure equality and diversity \(bristol.gov.uk\)](https://www.bristol.gov.uk/equality-diversity)

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\); Joint Strategic Needs Assessment \(JSNA\); Ward Statistical Profiles.](#)

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
<i>Bristol Council Census</i>	The census shows us that 18.7% of the Bristol population live in social housing. Within this, 13% of social housing tenants are in Bristol City Council tenancies. This number has changed since the last census in 2011 where Bristol City Council tenants made up 14.5% of the population. Nonetheless any change to the way that BCC maintains its properties and tenancies will have an impact on a significant portion of Bristol.

	<p>The population of Bristol is increasingly diverse with 18.9% identifying as a minority ethnic group, In Bristol the largest minority ethnic groups in 2021 were Somali 9,167 (1.9%), Pakistani, 9,103 (1.9%) and Indian 8,371 (1.8%).</p> <p>The 2021 census details that nearly half of all Bristol residents meet at least one of the four measures of deprivation. It is known that residents within social housing are more likely to experience deprivation and therefore it is clear that many of BCC's tenants will be part of this category.</p> <p>It is important to know the data regarding housing in Bristol to add perspective to the proposed policy implementation. We know that our tenants are likely to face issues that many other residents in Bristol do not face and therefore need to consider that within the proposal.</p>														
Complaints data	<p>Within Landlord Services, a total of 1514 complaints, 77 comments and 23 compliments were received. A breakdown by service area is shown in the table below.</p> <table border="1"> <thead> <tr> <th>Service</th> <th>Complaint</th> </tr> </thead> <tbody> <tr> <td>Estates & Housing Management</td> <td>466</td> </tr> <tr> <td>Repairs & Maintenance</td> <td>886</td> </tr> <tr> <td>Business Development</td> <td>5</td> </tr> <tr> <td>Housing Delivery (new homes)</td> <td>2</td> </tr> <tr> <td>Housing Options</td> <td>155</td> </tr> <tr> <td>Total</td> <td>1514</td> </tr> </tbody> </table>	Service	Complaint	Estates & Housing Management	466	Repairs & Maintenance	886	Business Development	5	Housing Delivery (new homes)	2	Housing Options	155	Total	1514
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Tenant Satisfaction Measures	<p>During 2023-24, 2309 residents (council tenants) responded to the annual resident satisfaction survey (TSM's). 33% of residents were satisfied with the how BCC (as a landlord) handled complaints.</p>														
Quality of life Survey	<p>This indicated that 83% of residents are satisfied with their home which leaves scope for complaints from residents who are living in poor conditions or unable to access the housing or housing services they require.</p>														
Additional comments:															

2.2 Do you currently monitor relevant activity by the following protected characteristics?

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

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

Yes

From carrying out a self-assessment, we have identified that Bristol City Council are unable to evidence that reasonable adjustments are taking into account in complaint handling. Further work is required with the equalities team to identify a robust and transparent process to record reasonable adjustments.

More generally we know that there are gaps in our diversity data for some protected characteristics citywide, especially where this has not historically been included in census and statutory reporting. We also know there are some gaps in our organisational diversity information - especially where personal and confidential information is voluntarily requested from staff. For example, only 1% of BCC residents have disclosed in diversity monitoring that they are Lesbian, Gay or Bisexual – however there is a high level of underreporting. We have additional data on Nationality, Ethnicity, Language & Self-certified disability. Gaps in data will exist as it becomes out of date or is limited through self-reporting. Bristol City Council tenant profile information may not be reliable. A tenancy audit is completed by BCC approximated every 5 years during the life of a tenancy, however equalities data is given voluntarily with a “prefer not to say” option. Bristol City Council may not be advised of changes in personal circumstance between audits, and it is not always possible to carry out a new tenancy audits immediately at the start of a new tenancy.

Information about Leaseholders and/or their tenants may not be available. An updated tenancy audit policy and related processes is currently being produced.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol’s diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing a change process or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

No, we are currently developing a governance pathway and with further consultation being captured in this pathway.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

We are going to develop a consultation piece which includes workshops and reviewing the current offer and assessing how we can engage with residents and provide complaints information in an accessible way.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)	
As previously stated, the report itself does not have any adverse impacts on Bristol residents upon completion of the self assessment of the complaint handling code it has been identified that there are accessibility barriers for residents which is explained below.	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Some older people are less likely to be comfortable using digital services. The accessibility of the complaints service could be considered a barrier as it is centred around an online system.
Mitigations:	The service does have an offline access point to mitigate this barrier.
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	This report recognises that some Disabled residents may find it difficult to access the service to make a complaint and receive support from the service, depending on impairment.
Mitigations:	We have a number of different access points for the complaints service including: in person, online, writing and telephone. We also encourage residents to notify us if they would prefer for us to engage with a representative.
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	It has been identified that there has been accessibility barriers for residents with English as a Second Language and may require language requirements when accessing the service.
Mitigations:	The service is providing documentation in alternative languages and staff have access to translator services to engage with residents.

Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Other groups [Please add additional rows below to detail the impact for any other relevant groups as appropriate e.g. asylum seekers and refugees; care experienced; homelessness; armed forces personnel and veterans]	
Potential impacts:	
Mitigations:	

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our [Public Sector Equality Duty](#) to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

The proposal aims to promote an accessible complaints service which reduces barriers to citizens accessing the service and promotes positive complaints culture where we are able to engage with a range of views and take learning from complaints data and shape the service.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

We are reviewing the complaints access points to start capturing more information around the vulnerabilities and adjustments required. Further training is being delivered to staff to identify vulnerabilities within the complaint handling process and adapt the service where appropriate to do so.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Review digital options to promote accessibility to the complaints service.	Jorden Crawford	30 th September
Develop a training plan to improve the complaints service delivery including responding to vulnerabilities and requests for reasonable adjustments.	Jorden Crawford	30 th September

4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

We will be able to provide data on the vulnerabilities information and adjustments stated. We have updated our complaints templates to acknowledge vulnerability information and will report on this data.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director¹.

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off: Reviewed by Fiona Lester
Date: 09/09/2024	Date: 02/09/2024

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.