



Equality, Diversity and Inclusion Policy

Status: Approved

Policy Lead :	People & Culture Lead
Owned By :	Leadership Team
Date Approved:	25 th March 2025
Approved By :	BHA Board
Review Date:	April 2028
Regulatory / Legislative Considerations/ References	<ul style="list-style-type: none"> • Equality Act 2010 • Housing (Scotland) Act 2010 • Scottish Housing Charter (April 2017) • Human Rights Act 1998 • European Convention on Human Rights • Scottish Housing Regulator, Regulatory Requirements • UK General Data Protection Regulation • Employment Rights Bill
Other Documents to be read in conjunction with this policy:	<ul style="list-style-type: none"> • Code of Conduct – Staff • Code of Conduct – Governing Body Members • Modern Slavery statement • Staff Handbook • Allocations policy • Complaints policy • Procurement policy • Recruitment and Selection policy • Rent and Service Charge policy • Rent Arrears policy • Protecting Vulnerable Customers policy • Unacceptable Actions policy • Responding to Neighbour Nuisance and Anti-social Behaviour policy • Domestic Abuse Policy • Aids and Adaptations policy • Dignity at Work Policy

Policy Title:	Equality, Diversity and Inclusion Policy
Purpose / Aim of policy:	<p>The purpose of the policy is to set out Berwickshire Housing Association’s (BHA) approach to promoting and ensuring equality, diversity and inclusion for both customers and colleagues.</p> <p>BHA will ensure respect, fairness and understanding on how customers and colleagues are treated. BHA is committed to ensuring everyone has the same opportunities regardless of their background and is committed to valuing diversity and eliminating discrimination.</p> <p>This policy aims to ensure that the nine protected characteristics covered within the Equality Act 2010, are considered in relation to discrimination, harassment or victimisation, which is unlawful. Those protected characteristics are:</p> <ul style="list-style-type: none"> • age • disability • gender re-assignment • marriage and civil partnership • pregnancy and maternity • race • religion or belief • sex; and • sexual orientation <p>The policy is not restricted to only the nine key characteristics. BHA also recognises that factors such as socio-economic status and background, including income, education, employment and social supports can impact on an individual’s life experiences, their ability to access opportunities and their sense of inclusion. BHA will take this in to consideration wherever appropriate.</p>
Scope of Policy:	<ul style="list-style-type: none"> • Legal framework • Roles and responsibilities • Information and analysis • Recruitment • Provision of housing related services • Complaints • Training and development • Workplace conduct • Monitoring and review
Approval Source:	BHA Board

<p>Equality Impact Assessment:</p>	<p>A full Equality Impact Assessment has been carried out and is at Appendix 1 of this policy.</p>
<p>Sustainability Assessment:</p>	<p>Engagement and retention of colleagues: BHA will promote a positive work environment which empowers colleagues to contribute fully, this means colleagues participate in surveys and want to remain with BHA in the longer term. Employee satisfaction is measured annually which offers BHA the opportunity to flag any areas for improvement relating to diversity and inclusion.</p> <p>Colleague development: BHA will offer targeted training and development opportunities both within the organisation and with external partners such as Chartered Institute of Housing. This ensures skills gaps can be met whilst ensuring equal opportunities for career progression across all colleague groups.</p> <p>Social responsibility and community impact: BHA is a key anchor within the communities they serve and will continue to work in partnership with other organisations and customers, to promote diversity and inclusion in the wider community and to address social inequalities.</p> <p>Long-term impact: BHA will evaluate how this policy contributes to building a sustainable organisation through a range of KPI's which are reported annually to the Board.</p>
<p>Partnership Assessment:</p>	<p>BHA will work in partnership with organisations and stakeholders within the communities served. This is particularly key where communities are disadvantaged through social inequalities as a joined up approach will provide a more comprehensive resolution to tackling such issues.</p>
<p>Definitions:</p>	<p>Equality: ensuring that every individual has an equal opportunity to make the most of their lives and talents and believing that no one should have poorer life chances because of where, when or whom they were born, or because of other characteristics. Promoting equality is about behaving in a way that tackles inequalities, aiming to ensure that all colleagues and service users are treated fairly, and do not experience discrimination.</p> <p>Diversity: recognising that everyone is different and creating a working environment that values each customer and colleague (including Board Members), ensuring that services are delivered that suit all sections of the community.</p> <p>Inclusion: positively striving to meet the needs of different people and taking deliberate action to create environments where everyone feels respected and able to achieve their full potential.</p> <p>Protected characteristics: within the Equality Act 2010 are: race, religion or belief, sex, age, gender reassignment, disability, sexual orientation, marriage and civil partnership and pregnancy and maternity, as specified by the Equality Act 2010.</p> <p>Equal Opportunities: within the Scotland Act 1998 refers to the elimination, regulation and prevention of discrimination across a number of areas: sex, marital status, race, disability, age, sexual orientation, language, social origin or other</p>

	<p>personal attributes, including beliefs or opinions, such as religious beliefs or political opinions.</p> <p>Direct Discrimination: less favourable treatment of an individual or group because of a protected characteristic.</p> <p>Associated Discrimination: this is direct discrimination against someone because they are associated with another person who possess a protected characteristic.</p> <p>Perceptive Discrimination: direct discrimination against someone because others think that they possess a particular protected characteristic. They do not need to possess the characteristics, just to be perceived to.</p> <p>Indirect Discrimination: when a neutral requirement or condition impacts adversely or has a disproportionate effect on a particular equity group.</p> <p>Harassment: when a person engages in unwanted conduct which is related to a protected characteristic, and which has the purpose or the effect of (i) violating the dignity of another person or (ii) creating for that person an intimidating, hostile, degrading, humiliating or offensive environment.</p> <p>Victimisation: this occurs when someone faces discrimination because she or he has made an allegation of unlawful discrimination or because of assisting or supporting a complainant.</p>
<p>Risk Implications:</p>	<p>Reputational Risk: A failure to implement any part of the Equality Act 2010, will not only put the reputation of BHA at risk but there may also be a financial penalty levied against the organisation. This risk can be reduced by ensuring all colleagues, board/committee members and volunteers are trained and fully understand their responsibility in relation to equality, diversity and inclusion. If BHA’s reputation is damaged it may cause difficulty in future recruitment.</p> <p>Confidentiality: It is important customers know how information about themselves will be used but more importantly, will be protected. The disclosure, retention, storage, access to, provision and disclosure of data will be dealt with in accordance with the Data Protection Act 2018, to reduce the risk of the misuse of data in anyway. ED&I data must remain anonymous, failure to do so could cause it to be used to discriminate against an individual, putting the organisation at risk of being challenged.</p> <p>Financial Risk: Discrimination in any way will open BHA up to a potential legal claim which may have a financial penalty with compensation being paid or a fine.</p> <p>Implicit Biases Risk: Lapses of judgment during decision making are often caused by implicit biases, which are subconscious attitudes that affect how people perceive and interact with others. Different implicit biases can pose an ED&I challenge, stopping employees from making purely objective decisions. This risk can be reduced through regular training and a culture of open challenge when this type of attitude is observed.</p>

1. Introduction

- 1.1 Berwickshire Housing Association and its subsidiary entities (collectively referred to as “BHA” throughout the remainder of the document) is committed to its Equality Diversity and Inclusion (ED&I) policy which will not discriminate against any group, or groups of persons, or treat anyone less favourable because of a protected characteristic they have or are thought to have.
- 1.2 This policy sets out how BHA is committed to supporting and promoting ED&I. This commitment is embraced by the board and committees and informs all of our activities and their impact on customers, colleagues and stakeholders.
- 1.3 The policy applies to everyone who receives a service from BHA, forms part of our governance, is employed and contracted by us or volunteers their services. We will also seek to ensure that anyone who works on behalf of BHA, demonstrates commitment to ED&I.

2. Policy Statement

- 2.1 This policy sets out BHA’s stance and approach to discrimination, bullying or harassment in the workplace and within our communities.
- 2.2 BHA will prevent discrimination, eliminate prejudice, promote inclusion and celebrate diversity within and outside of the organisation. We will be fair in dealings with all people; board members, colleagues, customers, volunteers and partners, with whom there is a relationship, taking into account the diverse nature of their culture and backgrounds. This includes contractors who may be working with BHA.
- 2.3 The introduction of any policy, significant project or change programme which BHA embarks upon will have an equality impact assessment carried out. This will ensure any changes deliver on BHA’s ED&I objectives and that ED&I is embedded in everything we do.
- 2.4 BHA will collect, review and measure data on a regular basis to inform on ED&I performance and outcomes including lettings, complaints, satisfaction, governance and recruitment. This will identify where positive action is required to address a different customer or colleague experience across protected characteristic, with the purpose of promoting and ensuring equality and fairness and improving outcomes.

3. Legal framework

- 3.1 BHA must comply and adhere with legal requirements and regulations outlined in statute. This policy will promote a culture of dignity and respect for all. The legislation particularly relevant to this policy includes:
 - Worker Protection (amendment of Equality Act 2010) at 2023 Human Rights Act 1998
 - Housing (Scotland) Act 2010
- 3.1.1 **Worker Protection (amendment of Equality Act 2010) at 2023**

The Worker Protection (amendment of Equality Act 2010) at 2023 consolidates much of the previous equalities-related legislation into one single Act.

The Act has three main aims: the first is to harmonise previous pieces of anti-discrimination legislation, the second is to strengthen and extend the law in a number of respects and thirdly the introduction on 26 October 2024 for employers to take preventative measures to prevent sexual harassment of their employees.

3.1.2 **Human Rights Act 1998**

The Human Rights Act 1998 confers rights and freedoms granted by the European Convention on Human Rights. The rights protected by the Act include the right to:

- Life
- Respect for private and family life, home and correspondence
- Freedom of religion or belief
- Freedom of expression
- Peaceful enjoyment of your possessions

3.1.3 **Housing (Scotland) Act 2010**

Section 39 states: 'Encouragement of Equal Opportunities - social landlords, when performing housing services, must act in a manner which encourages equal opportunities and in particular the observance of the requirements of the law for the time being relating to equal opportunities.'

3.2 **Regulatory requirements**

3.2.1 The Scottish Social Housing Charter sets out the standards and outcomes that all social landlords should aim to achieve when performing their housing activities. The Government's commitment to ensuring that Registered Social Landlords (RSLs) behave in a way that promotes equality and diversity and seeks to eliminate discrimination is demonstrated by Outcome 1 of the Charter which states:

'Outcome 1: Equalities - Social landlords perform all aspects of their housing services so that:

- *every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.'*

3.2.2 This outcome describes what social landlords, by complying with equalities legislation, should achieve for all tenants and other customers regardless of age, disability, gender reassignment, marriage and civil partnership, race, religion or belief, sex or sexual orientation. It includes landlords' responsibility for finding ways of understanding the rights and needs of different customers and delivering services that recognise and meet these.

3.3 **Regulatory Standards of Governance and Financial Management**

3.3.1 At the same time as the Charter was introduced, the Scottish Housing Regulator (SHR) introduced the Regulatory Standards for Governance and Financial Management:

'Standard 5 - The Registered Social Landlord (RSL) conducts its affairs with honesty and integrity and 5.3 The RSL pays due regard to the need to eliminate discrimination, advance equality and human rights, and foster good relations across the range of protected characteristics in all areas of its work, including its governance.'

3.4 The SHR also promotes equality impact assessments through the regulatory requirement to:

‘Have assurance and evidence that (each social landlord) considers equality and human rights issues properly when making all of its decisions, in the design and review of internal and external policies, and in its day-to-day service delivery.’

3.5 Each social landlord, therefore, should carry out equality impact assessments of their policies and practices, taking account of locally generated equality data. The impact on equality should be considered as a key part of policy development as the act of equality impact assessment drives improvements and removes barriers to access. BHA will complete equality impact assessments on all key policies.

4. Roles and responsibilities

4.1 There are clear roles and responsibilities within BHA for promoting and maintaining EDI principles.

BHA Group Board and Executive Team	<ul style="list-style-type: none"> • Providing overall leadership, championing ED&I across the organisation and approving policy. • Setting the overall ED&I strategy and monitoring BHA approach and performance against agreed objectives.
Executive Team	<ul style="list-style-type: none"> • Leading the implementation of the policy and the strategy, ensuring there are clear expectations for colleagues. • Ensuring adequate resources are made available to enable policy and strategic objectives to be met.
Lead Officers	<ul style="list-style-type: none"> • Supporting the delivery of the key policy objectives and associated actions. • Monitoring legislative and regulatory changes and ensuring they are reflected in BHA’s policy, strategy and actions.
All Colleagues	<ul style="list-style-type: none"> • Taking responsibility for delivering positive ED&I outcomes, by being aware of the policy and knowing how it affects their relationships with other colleagues and their work and service delivery to customers. • Challenge discriminatory behaviour and draw it to the attention of the Executive Team where necessary.

5. Information and Analysis

5.1 BHA will consider positive action to identify significant underrepresentation of groups with protected characteristics within the wider base of customers, board/ committee members or colleagues.

- 5.2 Where introducing new policies, significant change programmes or reviewing existing policies, an equality impact assessment will be carried out in all cases to ensure they deliver on ED&I requirements.
- 5.3 BHA will collect, review and measure data on a regular basis to inform on ED&I performance and outcomes including lettings, complaints, satisfaction, governance, recruitment and colleagues.
- 5.4 The data gathered will be summarised and reported to Board no less than annually.
- 5.5 Data gathered will be used to identify where positive action may be taken to address a different customer or colleague experience across protected characteristics.
- 5.6 At BHA we will provide a full explanation of why information is collected and what it is used for, treating sensitive personal data confidentially and only for the purpose of promoting and ensuring equality and fairness and improving outcomes.

6. Recruitment

6.1 *General*

- 6.1.1 BHA is committed to ensuring that it provides equality of opportunity in employment by ensuring that no job applicant or employee be directly or indirectly discriminated against on grounds of any of the protected characteristics. As an employer, BHA believes that its workforce should reflect the community that it serves and that all groups should be properly represented at all levels within the organisation. BHA accepts that it should take action to eliminate discrimination.

6.2 *Recruitment*

- 6.2.1 Recruitment advertising will be undertaken in such a manner as to avoid discriminatory effects. Experience necessary to perform duties will be the main determinant of candidate suitability, along with candidates' ability to demonstrate their values align with those of BHA whilst academic qualifications will be quoted where applicable at a reasonable and realistic level required for the position. Initial shortlisting will be undertaken blind, meaning name, age, sex, etc., will not be visible to the recruitment panel. EDI data collection will be separated from any application forms and held anonymously.
- 6.2.2 BHA has a duty to make reasonable adjustments for anyone with a disability to ensure they can access employment and services.

6.3 *Training*

- 6.3.1 All employees will receive training to ensure they understand and implement all aspects of the EDI Policy. As part of the BHA Induction Programme, it is the responsibility of the line manager to ensure any new colleague is fully aware of the EDI Policy. All employees, board and committee members, will receive regular refresher training at least bi-annually or more frequently as required.

6.4 *Working Environment*

6.4.1 BHA aim to create a supportive and inclusive working environment where everyone can realise their full potential, regardless of their background or characteristics.

6.4.2 We will provide a working environment that recognises the individual needs of colleagues, ensuring proper access through adaptations or relevant reasonable adjustments made for those with disabilities. Working arrangements will have regard to a colleague's responsibility for dependents and/or personal circumstances, however it is essential that BHA can continue to provide high quality services.

6.5 *Harassment*

6.5.1 BHA will not tolerate the harassment or victimisation of employees by other members of staff, volunteers, tenants, contractors or members of the public in any circumstances and will take appropriate action against the perpetrators.

6.6 *Conditions of Employment*

6.6.1 It is a condition of employment that all employees adhere to BHA's ED&I policy and failure to do so will be cause for disciplinary action to be taken which may result in dismissal.

7. Provision of Housing and Related Services

7.1 *General*

7.1.1 BHA is committed to equal access to housing and services for all existing and prospective customers. As a provider of social housing, BHA believes its tenants should reflect the community it serves and that all groups should be represented. We will take positive measure to ensure that all members of the community are aware of the services we provide including the availability of housing stock.

7.2 *Access to Information*

7.2.1 BHA is committed to ensuring that access to information on housing and related services will be available to existing and prospective customers. BHA will take such measures as are reasonably practicable to ensure that its services are publicised in such a way as to be accessible to all identified sections of the community, including the supply of information to organisations working on behalf of minority groups. Where required, this would also include the translation of essential tenancy information for any customers whose first language is not English.

7.2.2 Information will be accessible to those groups who have a hearing or visual impairment either through audit, large print or Braille where requested.

7.3 *Allocations*

7.3.1 BHA will ensure that there is fair and equal treatment to all groups in terms of access to housing and quality of housing allocated. BHA will have in place an Allocations Policy which sets out these requirements in more detail. Proper recording, reporting and monitoring procedures will be carried out.

7.4 *Arrears*

7.4.1 The collection of rent arrears or other debts to BHA, will be dealt with sensitively and fairly. BHA will have policies and procedures highlighting the importance of arrears prevention and action for control and recovery.

7.5 *Maintenance and Repairs*

- 7.5.1 BHA will ensure properties are in a good state of repair and that installations are maintained and in proper working order to ensure properties are fit for human habitation and that no defects place anyone in potential danger.
- 7.5.2 BHA will ensure that all tenants receive the same quality of maintenance and repairs service, although BHA considers that certain groups, such as older people, may be more vulnerable and consequently may be given additional assistance with certain repairs.
- 7.5.3 Disabled people/people with disabilities will be given priority to reflect the additional threshold afforded to people who share the protected characteristic of disability within the Equality Act 2010.

7.6 *Design Brief and Standards*

- 7.6.1 BHA will seek to ensure that all new developments are built to comply with the standards laid down in the publication 'Housing for Varying Needs' and to agreed minimum standards to allow tenants to reduce their dependence on others and maximise choice in their daily life. Wherever possible BHA will attempt to involve tenants and prospective tenants in the design process.

8.0 Workplace Conduct

- 8.1 BHA will not tolerate behaviour from colleagues which is aggressive, abusive, bullying, harassment, including sexual and gender-based harassment, racism, ableism and ageism.
- 8.2 Any reports of such conduct will be investigated swiftly and dealt with through the relevant HR processes including disciplinary.
- 8.3 Conduct towards BHA colleagues by customers, contractors or any other third party will be dealt with in accordance with the Unacceptable Actions Policy.

9.0 Complaints

- 9.1 BHA expects all complaints to be dealt with in a professional manner, with courtesy, respect, and dignity. All members of the community have the right to equal access to our complaints service. To enable all tenants and customers to have clear information and equal access to our complaints policy, we will accept complaints, compliments, and feedback in any form, including in person, over the telephone or via email, in line with our Complaints Handling Procedures.
- 9.2 If after exhausting our internal complaints procedure the customer is unhappy with the outcome they can apply to the Scottish Public Services Ombudsman (social rented tenants).

10.0 Training and development

- 10.1 BHA will ensure that all colleagues, volunteers, board and committee members, receive regular, relevant and up to date training and support to enable them to champion ED&I in all areas of work and projects. All new colleagues, board and

committee members will be provided with comprehensive diversity and inclusion training to raise awareness and promote inclusion.

- 10.2 We will promote equality through all our activities as an employer, service provider and partner.
- 10.3 We will take all reasonable steps to ensure our partners, contractors, suppliers and groups connected to us are actively committed to ED&I principles.
- 10.4 As part of training and development, BHA will help colleagues to understand how to address prejudice and unconscious bias.

11. Monitoring and Review

- 11.1 Within the terms of the GDPR regulations, BHA will gather information on ethnic origin, sex, age and disability from all customers, colleagues, board and committee members and all applicants applying for housing and employment. Equality data is gathered to inform service delivery and to improve our organisational policies and practices as appropriate.
- 11.2 Where applicable, indicators and measures will be identified to measure performance against any objectives set in the ED&I strategy, and achievement of any identified actions will also be monitored. Such performance measures and statistical information will be reported to the Board at least once a year.
- 11.3 This policy will be reviewed 3 years from the date of implementation or latest review; which will be the date the policy is approved by the board or earlier if deemed appropriate. In the event that this policy is not reviewed within the above timescale, the latest approved policy will continue to apply.

Appendix 1



Equality, Diversity & Inclusion (EDI) Impact Assessment Template

Please refer to the Equality, Diversity & Inclusion (EDI) Impact Assessment Guidance Notes to support the completion of this document.

STEP 1 - Overview	
Title of the policy or framework being assessed:	Equality, Diversity and Inclusion Policy
Date of assessment:	5 March 2025
Name and job title of the policy owner:	Michelle Meldrum, Chief Executive Officer
Names and job titles of other colleagues involved in completing the assessment:	Evie Copland, Director of Customer and Communities
Type of policy <i>Please tick</i>	New Policy:
	Existing Policy: <input checked="" type="checkbox"/>
Describe the purpose of the policy:	<p>The purpose of the policy is to set out how BHA will promote and ensure equality, diversity and inclusion for both customers and colleagues.</p> <p>The policy sets out how BHA will ensure respect, fairness and understanding on how customers and colleagues are treated. BHA is committed to ensuring everyone has the same opportunities regardless of their background and is committed to valuing diversity and eliminating discrimination.</p> <p>The policy aims to ensure that the nine protected characteristics covered within the Equality Act 2010, are considered in relation to discrimination, harassment or victimisation, which is unlawful. Those protected characteristics are:</p> <ul style="list-style-type: none"> • age • disability • gender re-assignment • marriage and civil partnership • pregnancy and maternity • race • religion or belief • sex; and • sexual orientation <p>The policy is not restricted to only the nine key characteristics. BHA also recognises that factors such as:</p>

	<ul style="list-style-type: none"> • socio-economic status, background, including income • education • employment • social support <p>As each can impact on an individual's life experiences, their ability to access opportunities and their sense of inclusion. BHA aim to take this into consideration wherever appropriate.</p>
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STEP 2 - Data Analysis

In relation to ED&I, please outline any relevant data/evidence analysed and the insight obtained:	<p>According to 2022 Scottish census data, the population of the Scottish Borders was 116,900 with an average population growth for Scotland.</p> <p>However the SBC local authority area has the fifth highest proportion of over 65s of all council regions in Scotland. This is not surprising to us and is in line with our own data collection from our customers in 2020.</p> <p>We recognise that our approach to collecting customer insight data needs to be increased at a more regular frequency and we will work towards this as part of our ED&I reporting during 2025/26.</p>
<p>Have any data gaps been identified? Please tick. If 'Yes' add an action point about this in the action plan in step 6.</p>	<p>Yes: Increase in collection, gaps for new customers, data and reporting available to produce information for leadership and committee review as well as publishing information, outcomes and performance to customers.</p>
	<p>No:</p>

STEP 3 - Assessment
Please consider each of the protected characteristics below and indicate with a tick where you have identified positive, negative or neutral impact. Provide details of all positive or negative impacts in relation to people in the relevant box on the right.

Protected Characteristic	Positive impact	Negative impact	Neutral impact	Provide details of any positive or negative impacts identified
Age			√	Hard copy provision for those not online needs to be factored into any wider comms – our customer population is reflective of wider Borders position in terms of older people.
Disability			√	60 customers have noted requirements for large print – need to be factored into provision of materials for customers who require this method

Gender Reassignment			√	Need to ensure increased options by updating these as customers feel appropriate and by checking names and suffixes when contacting customers as part of our communication/campaigns. Options at the moment for recording of information may be limited for the experience and preferences of some customers.
Marriage/Civil Partnership		√		Corporate imagery used on external documents reflects the diversity of our communities

Pregnancy and Maternity		√		
Race		√		Corporate imagery used on external documents reflects the diversity of our communities
Religion or Belief		√		
Sex		√		
Sexual Orientation		√		
Customers without English as a first language	√			Happy to Translate training completed in 2024 to assist with guidance and support for face to face interactions with customers. Further work to do to provide hard copy letters and other communications in line with customer needs when English is not their first language, particularly around enforcement and debt owed

STEP 4 - Mitigating Negative Impacts	
Set out what action is currently being undertaken to mitigate any potential or actual negative impact identified:	As above – with actions to support the policy embedding to be taken as below ahead of review in 2028.
Identify any further action that could be undertaken to mitigate any potential or actual negative impacts: <i>Remember to record any future action in the action plan in step 6.</i>	<ol style="list-style-type: none"> 1. Approach to insight data collection to refine and set out for annual rolling programme 2. Hard copy provision for those not online needs to be factored into any wider comms 3. Communications sent/offered in preferred method of contact (including translations, braille and large print) 4. Customer preferred names to be checked during communications/campaigns to

	<p>check in, recorded and used</p> <ol style="list-style-type: none"> 5. Gender reassignment approach to be reviewed in line with best practice 6. Further work to understand increasing number of mental health conditions in our communities and appropriate access to our services (particularly for neurodivergent customers) and adjustments that need be applied 7. Increased use of real customers for corporate imagery and people from our communities to represent the diversity of Berwickshire 8. Translations available and clear guidance for colleagues on when translations are required and hard copies are essential.
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STEP 5 - Making a Decision	
<i>Please tick the relevant option</i>	
Option 1 - Proceed with no changes The assessment demonstrates that the policy is robust and there is no potential for discrimination or negative impact.	
Option 2 - Proceed with adjustments The assessment identifies potential negative impact or missed opportunities. Remove or adjust certain aspects or introduce mitigating actions.	√
Option 3 - Stop The assessment identifies actual or potential unlawful discrimination. It must be stopped and removed or significantly changed.	

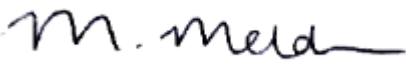
STEP 6 - Action Plan		
Action Identified	Responsibility	Target Completion Date
1. Approach to insight collection	EC	March 2026
2. Hard copy provision of comms for those who are not online	SI/EC	June 2025
3. Communications by preferred method	EC	June 2026
4. Approach to customer contact (preferred name) to develop/embed	EC/JR	August 2025
5. Approach to supporting customers and updating information for gender reassignment to develop/embed	EC/JR	December 2025
6. Mental health condition awareness training	LB	June 2026
7. Develop BHA image library	SI	January 2026
8. Translation/interpreter approach to confirm and embed	EC/JR	December 2025

Next Steps

- ★ This completed EDI Impact Assessment should be submitted alongside the policy and placed on file.

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- ★ A copy should be retained by the policy owner as it is their responsibility to ensure that the Action Plan is completed.

Signed by: This should be the policy owner	
Date:	5/3/25