

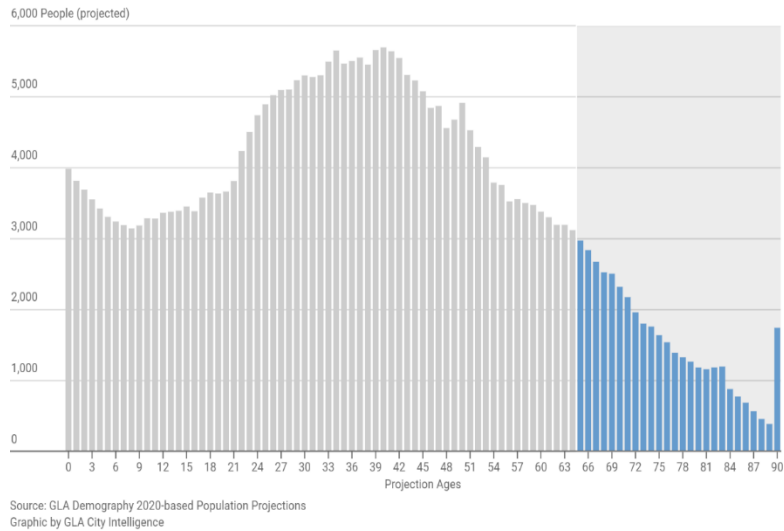
## Equality Impact Assessment: Vulnerability Policy

<b>Title</b>	Equality Impact Assessment: Vulnerability Policy
<b>Service</b>	Housing and Safer Communities
<b>Author/s</b>	Michael Burke and Michael Hammonds
<b>Chief Officer</b>	Jamie Carswell, Director of Housing and Safer Communities
<b>Date</b>	March 2025
<b>Detail of Assessment</b>	
<p>The data used to inform this impact assessment has been captured from:</p> <ul style="list-style-type: none"> <li>• Royal Borough of Greenwich’s housing management system</li> <li>• Office for National Statistics</li> </ul>	
<b>What is its purpose?</b>	
<i>Is this a new service/policy or a change to an existing service/policy?</i>	
<p>The proposed Vulnerability Policy seeks to consolidate existing HSC protocols and processes, and this Equality Impact Assessment (EIA) aims to evaluate the potential effects of the proposed Vulnerability Policy on Tenants and Leaseholders’ protected characteristics, as set out in the Equalities Act (2010).</p>	
<b>What are its main objectives (of the new/revised service or policy)?</b>	
<p>The core objectives of the proposed Vulnerability Policy are to deliver fair access to HSC services and equitable outcomes from those HSC services for <i>all</i> Tenants and Leaseholders, and where necessary, prospective Tenants and Leaseholders.</p>	
<b>Context</b>	
<p>The proposed Vulnerability Policy is a ratification of existing HSC protocols and processes vis-à-vis this consolidation policy document comprising RBG’s HSC overall approach to vulnerability. Therefore, there should not be any immediate change and limited (if any) improvement to those HSC protocols and processes, and no impact on equality characteristics as set out in the Equalities Act (2010).</p>	
<b>Criteria</b>	

<i>Is this function designed to meet specific needs of groups with protected characteristics?</i>
<p>The proposed Vulnerability Policy deals with the problem of intersectionality - when a vulnerable Tenant may be considered in more than one of the equality characteristics - by considering multiple protected characteristics to ensure the best possible support available at point of contact.</p> <p>Secondly, the proposed Policy document will have a cross-functional usage across Royal Borough of Greenwich's Housing and Safer Communities Directorate, making identification easier and treatment of vulnerable Tenants and Leaseholders consistent.</p> <p>Lastly the increased visibility and accessibility of the proposed Vulnerability Policy to staff and colleagues will have the benefit of increasing the knowledge about what standards Tenants and Leaseholders should expect from RBG's HSC department.</p>
<p><b>Outcomes of Assessment</b></p> <p><i>Identify which, if any of the protected groups will be affected (as identified by the initial screening form), including likelihood of impact (high, med, low, none)</i></p>
<p>It is envisaged that the proposed Vulnerability Policy will impact positively on all equality characteristics as set out in the Equalities Act (2010). This assessment will not cover the impact of vulnerability on every type of imagined case, but has used likely examples, and assessed the likely impact from these examples.</p>

Group	Level of Impact (high, med, low, none)	Impact	Mitigation / action																		
Age	None	<p>On the basis that the proposed Vulnerability policy will apply to all Tenants and Leaseholders, it is not considered to disproportionately disadvantage tenants on the grounds of age.</p> <p>According to the 2021 census, the median age in Royal Greenwich was 35 years, this compares with a median age across England and Wales of 40 years.</p> <p><b>Elderly People</b></p> <p>According to the data held in the Housing Management System (NEC Northgate) in December 2024, 23.26% of our Tenants are 66 years old or older.</p> <table><tr><th>Age ranges</th><th>Count of Age</th><th>% of tenant population</th></tr><tr><td>18-24 Years</td><td>357</td><td>1.79%</td></tr><tr><td>25-65 Years</td><td>14429</td><td>72.50%</td></tr><tr><td>66 Years and above</td><td>4628</td><td>23.26%</td></tr><tr><td>No data</td><td>487</td><td>2.45%</td></tr><tr><td><b>Total</b></td><td><b>19901</b></td><td><b>100%</b></td></tr></table> <p>According to the GLA, there is projected growth in the age group 66-90, growing from 31,362 in 2024 to 37,780 in 2030, meaning we will have more residents of state pension age by 2030 (Source: <a href="#">GLA Population Projections</a> accessed on 28/11/24).</p> <p>Whilst not all elderly people can be classed as being vulnerable, we can consider that a high proportion of older people will have vulnerabilities, and people will become more vulnerable with age.</p>	Age ranges	Count of Age	% of tenant population	18-24 Years	357	1.79%	25-65 Years	14429	72.50%	66 Years and above	4628	23.26%	No data	487	2.45%	<b>Total</b>	<b>19901</b>	<b>100%</b>	Promote the new policy and ensure new procedures are easily accessible.
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Population by Age: Greenwich  
Identified Capacity, 2030, Borough Total, All Persons



Disability

None

On the basis that the proposed Vulnerability Policy will apply to all Tenants and Leaseholders it is not considered to disproportionately disadvantage tenants on the grounds of disability.

According to NEC Northgate data, 3.07% of our tenants have a disability with an additional 6.19% who could potentially have a disability as shown in the table below. This data was collected a number of years ago and is not up to date.

Indicated as Disabled	Count of Disability indicated	% of tenant population
No	18060	90.75%
Yes	610	3.07%
No data	1231	6.19%
<b>Total</b>	<b>19901</b>	<b>100%</b>

*(Data held in NEC Northgate V6 correct as of 1 December 2024)*

According to census data (2021) 45% of households in RBG have at least one disabled person living in them, compared to 28% of households across the borough. This

Promote the new policy and ensure new procedures are easily accessible.

		<p>is partly because people with a disability are more likely to be in housing need, and partly because our residents are more likely to be older and therefore to develop a disability even if they did not have one when they started living in our homes.</p> <p>Not all disabled people can be identified as vulnerable, but some will experience vulnerability due to their condition, and may become vulnerability temporarily, permanently or in the future.</p>																																														
Race	None	<p>On the basis that the proposed Vulnerability policy will apply to all Tenants and Leaseholders, it is not considered to disproportionately disadvantage tenants on the grounds of race.</p> <p>The profile of our tenants shows that the largest proportions of tenants are of the following ethnicities:</p> <table><tr><th>Ethnic background</th><th>Count of Ethnic background</th><th>% of tenant population</th></tr><tr><td><b>All Asian backgrounds</b></td><td><b>1147</b></td><td><b>5.76%</b></td></tr><tr><td>Asian - Bangladeshi</td><td>90</td><td>0.45%</td></tr><tr><td>Asian - Indian</td><td>138</td><td>0.69%</td></tr><tr><td>Asian - Pakistani</td><td>68</td><td>0.34%</td></tr><tr><td>Asian - Chinese</td><td>120</td><td>0.60%</td></tr><tr><td>Asian - Vietnamese</td><td>171</td><td>0.86%</td></tr><tr><td><b>All other Asian backgrounds</b></td><td><b>560</b></td><td><b>2.81%</b></td></tr><tr><td>All Black backgrounds</td><td>5200</td><td>26.13%</td></tr><tr><td>Black - African</td><td>3077</td><td>15.46%</td></tr><tr><td>Black - Caribbean</td><td>656</td><td>3.30%</td></tr><tr><td>Black - Somali</td><td>1141</td><td>1.64%</td></tr><tr><td>All other Black backgrounds</td><td>1141</td><td>5.73%</td></tr><tr><td><b>All mixed backgrounds</b></td><td><b>542</b></td><td><b>2.72%</b></td></tr><tr><td>Mixed - White and Asian</td><td>66</td><td>0.33%</td></tr></table>	Ethnic background	Count of Ethnic background	% of tenant population	<b>All Asian backgrounds</b>	<b>1147</b>	<b>5.76%</b>	Asian - Bangladeshi	90	0.45%	Asian - Indian	138	0.69%	Asian - Pakistani	68	0.34%	Asian - Chinese	120	0.60%	Asian - Vietnamese	171	0.86%	<b>All other Asian backgrounds</b>	<b>560</b>	<b>2.81%</b>	All Black backgrounds	5200	26.13%	Black - African	3077	15.46%	Black - Caribbean	656	3.30%	Black - Somali	1141	1.64%	All other Black backgrounds	1141	5.73%	<b>All mixed backgrounds</b>	<b>542</b>	<b>2.72%</b>	Mixed - White and Asian	66	0.33%	<p>Promote the new policy and ensure new procedures are easily accessible.</p>
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Gender (sex)	None	On the basis that the proposed Vulnerability policy will apply to all Tenants and Leaseholders regardless of the gender of tenants, it is not considered to disproportionately disadvantage Tenants on the grounds of gender.	Promote the new policy and ensure new procedures are easily accessible.																														

		<p>The profile of our Tenants show that we have more female lead Tenants (59.15%) than male (34.41%) as shown below:</p> <table><tr><th>Gender</th><th>Count of Gender</th><th>% of tenant population</th></tr><tr><td>Female</td><td>11771</td><td>59.15%</td></tr><tr><td>Male</td><td>6847</td><td>34.41%</td></tr><tr><td>No data</td><td>1283</td><td>6.45%</td></tr><tr><td><b>Total</b></td><td><b>19901</b></td><td><b>100%</b></td></tr></table> <p>(Data held in Northgate V6 correct as of 1 December 2024)</p>	Gender	Count of Gender	% of tenant population	Female	11771	59.15%	Male	6847	34.41%	No data	1283	6.45%	<b>Total</b>	<b>19901</b>	<b>100%</b>	
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Sexual orientation	None	<p>On the basis that the proposed Vulnerability Policy will apply to all Tenants and Leaseholders regardless of their sexual orientation, it is not considered to disproportionately disadvantage Tenants on the grounds of sexual orientation.</p> <p>4.42% of people in the borough identified their sexuality with an LGBTQ+ orientation according to the 2021 Census data collected by the Office of National Statistics (ONS).</p> <p>(Source: <a href="https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualorientationenglandandwales/census2021">https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualorientationenglandandwales/census2021</a> Accessed on 19/11/2024)</p> <p>That said, we cannot currently be sure of the total population of LBG+ community who are also a council Tenant, as we do not currently collect this data from our Tenants directly. However, we are confident that the proposals within the report will not discriminate against people depending on their sexual orientation.</p>	Promote the new policy and ensure new procedures are easily accessible.															
Religion or belief	None	<p>On the basis that the proposed Vulnerability Policy will apply to all Tenants and Leaseholders it is not considered to disproportionately disadvantage tenants on the grounds of religion or belief.</p> <p>The Council does not hold data on this protected characteristic in relations to our housing tenants. We</p>	Promote the new policy and ensure new procedures															

		do not, however, consider there to be any proposals included in the report that will disproportionately negatively impact people from particular religious groups or with specific beliefs.	are easily accessible.
Gender identity (Gender re-assignment)	None	<p>On the basis that the proposed Vulnerability Policy will apply to all Tenants and Leaseholders it is not considered to disproportionately disadvantage tenants on the grounds of gender identity.</p> <p>We do not hold data on this characteristic in relation to our housing tenants. We do not, however, consider the proposals within the report will adversely impact on this group. The Council is committed to treating all service users equitably and respecting people's gender identity.</p> <p>On the basis that the increased rent charge is applied consistently across all properties and not targeted to individual occupants, i.e. it applies to the tenant regardless of gender reassignment, the increase is not considered to disproportionately disadvantage tenants on the grounds of gender re-assignment.</p>	Promote the new policy and ensure new procedures are easily accessible.
Pregnancy or maternity	None	<p>On the basis that the proposed Vulnerability Policy will apply to all Tenants and Leaseholders it is not considered to disproportionately disadvantage tenants on the grounds of pregnancy and maternity/parental leave.</p> <p>Pregnancy is one of the 'priority need' groups defined in legislation, which means that women who become homeless will be accommodated in emergency situations in line with Part VII of the Housing Act 1996.</p>	Promote the new policy and ensure new procedures are easily accessible.
Caring responsibilities	None	<p>On the basis that the proposed Vulnerability Policy will apply to all Tenants and Leaseholders, it is not considered to disproportionately disadvantage tenants on the grounds of caring responsibility.</p> <p>The Council does not hold data on this protected characteristic in relations to our housing tenants. However, the 2021 Census tells us that 3.5% of Greenwich residents (aged five years and over) reported to provide up to 19 hours of unpaid care each</p>	Promote the new policy and ensure new procedures are easily accessible.



		<p>week with a further 1.8% reported providing between 20 and 49 hours of unpaid care each week.</p> <p>Having unpaid caring responsibilities means they look after a family member, partner or friend who needs help because of their illness, frailty, disability, a mental health problem or an addiction and cannot cope without their support.</p> <p>The care they give is unpaid. Unpaid carers who provide high levels of care for sick, or disabled relatives and friends, are more than twice as likely to suffer from poor health compared to people without caring responsibilities.</p>	
Socio-economic background	None	<p>On the basis that the proposed Vulnerability policy will apply to all Tenants and Leaseholders it is not considered to disproportionately disadvantage tenants from any particular Socio-economic background.</p> <p>We currently have 9167 tenants in receipt of Housing Benefit and 8973 tenants receiving Universal Credit (Data held in Northgate V6 correct as of 1 December 2024).</p>	Promote the new policy and ensure new procedures are easily accessible.

## Consultation

*How were groups/individuals consulted (in particular those groups identified as being affected)?  
What research was used to help decision-makers understand the different impact on protected groups?*

The proposed Vulnerability Policy is a ratification of existing RBG protocols and processes. RBG have engaged with stakeholders from relevant directorates and with a clear and transparent Vulnerability policy document in place, and plan to work collaboratively with these stakeholders on processes involving vulnerable Tenants and Leaseholders, whilst monitoring their impact on equality characteristics at the service level.

Some additional light research was undertaken with resident volunteers. The residents were signed up for the council's YourView engagement programme.

39 volunteers completed an online survey, over a 10-day period in February 2025, which captured some thoughts about their experience of receiving an adapted service due to a perceived vulnerability. It also told us about their views on what vulnerability means and who in the community might be considered vulnerable.

Only 11 of the 39 respondents had received such a service, however none of them had been dissatisfied.

- 45% were very satisfied (5)
- 36% were somewhat satisfied (4)
- 18% were neither satisfied nor dissatisfied (2)

Although this was a very small sample – it offered some assurances that adapted services happened and that generally people were happy with them. This will be a good place to start when we come to engage on the procedures.

The topics drawn out from the survey responses included:

- Appropriate amendments made to issuing repairs for people with a vulnerability
- People feeling their needs were met
- Staff/services and their attitudes to the customer
- Inclusive communication channels for easy access to services.

All of these topics will be considered as part of the consolidation of the Vulnerability policy and for the joint work with residents in future to develop improved procedures to support vulnerable people to access housing related services.

66.7% of respondents agreed that the definition below was their first choice for suitable definition of vulnerability for a dealing with vulnerable persons policy

**Definition 1** - *Vulnerability means characteristics that a tenant or household member possesses, either permanently or temporarily, that may mean they need care, support or other reasonable adjustments to complete landlord-tenant transactions such as paying their rent, opening the door to allow a gas safety check. These characteristics may mean that reasonable adjustments are appropriate to actively prevent harm or distress. These can include recognised physical disabilities or mental health issues, but will also include transitory situations, such as financial difficulties or a broken leg.*

This definition was also staff's choice too and will be used in the proposed policy.

23 respondents said that they would be interested in following up by working with us to consider the procedures which sit alongside the proposed vulnerability policy.

The respondents also suggested the following as people who might be considered vulnerable.

<b>Health</b>
A person with any diagnosed health condition that lasts 12 months or more
A person with physical disabilities,
A person with sensory impairments
People with short- and long-term medical condition and learning disability
People with long term health conditions and chronic diseases/autoimmune diseases
People down with the flu
People returning home from hospital after major operations (could be temporary or longer lasting)
<b>Protected Characteristics</b>
Older people
LBGT+ people
Pregnant women
People with neurodivergent behaviours.
<b>Other Circumstances</b>
A person with low level literacy or illiterate
Domestic violence victim
A person with an addiction
People released from prison and need rehabilitation in the community.
Person whom have lost the person they live with and left alone
Widows
Person whose long-term partner has left.
Those in a household with people likely to abuse them who cannot live alone
A person living in a top flat in high rise building with maybe 3 small children
blue badge holders
People with no living close relatives such as orphans or elderly with no children
People who do not or no longer has access to the internet.
Lifts when they go out of order, making access to the higher floors even more difficult.
People with vulnerable family members

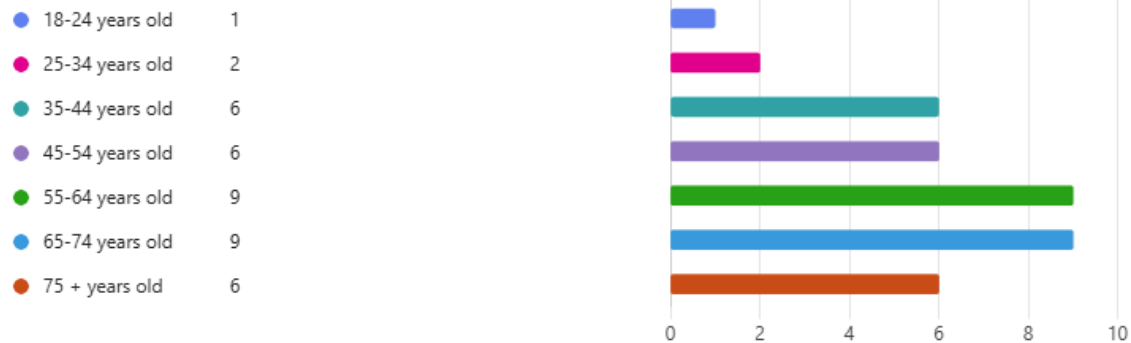
Note: Whilst consideration will be given to each suggestion, not all will be considered as vulnerable under the proposed policy.

A further consideration would be how this data if collected was made available to the council and how this data would be stored and made accessible to staff at any given time when a service request was made. This will be picked up as part of the Data Capture work which is a separate project.

The following are the demographics of those volunteers who took part in this research

## Age

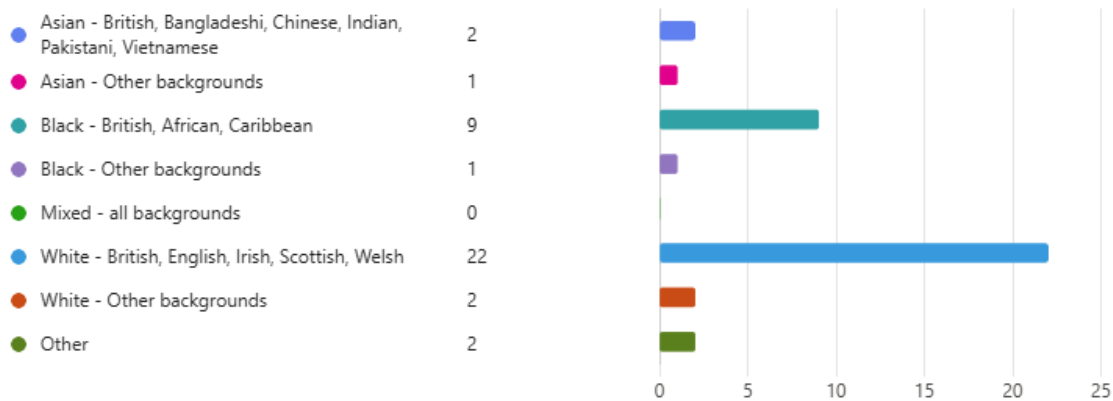
7. About you - What is your age?



A good mix of age groups took part in the research however the majority of the respondents were aged over 55 years of age.

## Ethnicity

8. About you - How would you describe your ethnicity?

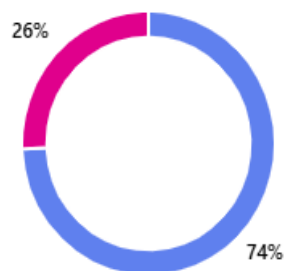


56% of all respondents described their ethnicity as White British, English, Irish, Scottish or Welsh. With 23% describing their ethnicity as Black British, African or Caribbean.

## Gender

9. About you - How would you describe your gender?

Woman	29
Man	10
Non-binary	0
Prefer not to say	0

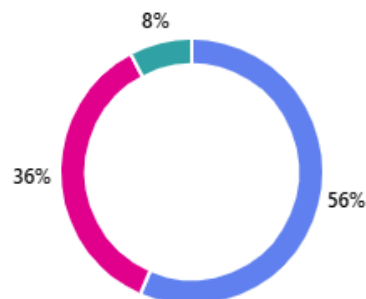


The majority of respondents were women.

## Disability

10. About you - Would you consider yourself to have sensory, physical or mental disabilities?

Yes	22
No	14
Maybe	3



56% of respondents advised that they consider themselves to have either a sensory, physical or mental disability.

## Monitoring of Impact

We will continue to monitor the performance of the services we deliver using the usual scrutiny procedures. We will create a communication plan for the proposed policy, with input from BWHP panel representatives to ensure that we utilize accessible forms of communication around the Vulnerability Policy.

## Decision

The proposed Vulnerability Policy does not discriminate and will impact positively on all equality characteristics as set out in the Equalities Act (2010). There are no changes explored by the proposed policy so there is no potential for this to create inequality, or worsen, existing inequality.

**Date of Review** March 2027

To be used following implementation of decisions, usually within six months  
– a year.

<b>Title</b>	Vulnerability Policy
<b>Service</b>	Strategy and Improvement
<b>Author</b>	Michael Burke and Michael Hammonds
<b>Chief Officer</b>	Jamie Carswell
<b>Date</b>	March 2025
<b>Describe the service/policy change or implementation</b>	
<i>Further to the previous equality impact assessment undertaken what ongoing work has been carried out to ensure that the services (including procured or commissioned services) or employment practices are fair, equitable, consistent and transparent.</i>	
Definition of Vulnerability	
<b>List actions identified in EIAs and report on progress</b>	
Promotion of Policy and procedures once written	
<b>Explain any outstanding issues</b>	
N/A	
<b>If applicable, describe any new initiatives (that contribute to equality work) undertaken that were not in the initial EIA</b>	
N/A	
<b>Please provide information on data collected and what does the analysis of the data show in relation to local population data</b>	
Included in EIA	
<b>Have there been any consultations formal or informal undertaken?</b>	
Informal with YourView panel and with internal partners	
<b>If applicable, set new targets and review timetable</b>	
N/A	