



## Equality Impact Assessment (EIA) -

|                                                                               |                                                                                                                                                                                                                                  |                                                       |
|-------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------|
| Activity being assessed                                                       | Prevention against Financial Crime Policy                                                                                                                                                                                        |                                                       |
| Purpose of activity being assessed                                            | The purpose of the policy is to confirm our commitment to preventing, detecting and guarding against the impacts of financial crime and to reporting concerns appropriately and responsibly. This policy outlines how we do this |                                                       |
| Lead officer                                                                  | Lauren Ricketts, Risk and Assurance Manager                                                                                                                                                                                      |                                                       |
| EIA completed by<br>(colleagues involved in completing EIA with lead officer) | Completed by:<br>Lauren Ricketts<br>Lauren Cannon                                                                                                                                                                                | Reviewed / amendments suggested by:<br>Sarah Phillips |
| Date EIA completed                                                            | 19.02.2026                                                                                                                                                                                                                       |                                                       |

### Data used in preparing EIA

| Data used                                                                 | Insight obtained and associated considerations |
|---------------------------------------------------------------------------|------------------------------------------------|
| <ul style="list-style-type: none"><li>Service users</li></ul>             | N/A                                            |
| <ul style="list-style-type: none"><li>Uptake data</li></ul>               | N/A                                            |
| <ul style="list-style-type: none"><li>Service satisfaction data</li></ul> | N/A                                            |



|                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| • Complaints and compliments about the service | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| • Survey of customers/colleagues               | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| • Focus groups                                 | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| • Written responses to policy                  | N/A                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| • Other - please list source                   | <ul style="list-style-type: none"> <li>• Bribery Act 2010;</li> <li>• Computer Misuse Act 1990;</li> <li>• Criminal Finances Act 2017;</li> <li>• The Money Laundering, Terrorist Financing &amp; Transfer of Funds (Information on the Payer) Regulations 2017 (MLR);</li> <li>• Fraud Act 2006;</li> <li>• Prevention of Social Housing Fraud Act 2013;</li> <li>• Proceeds of Crime Act 2002 (PoCA);</li> <li>• Serious Crime Act 2015;</li> <li>• Terrorism Act 2000;</li> <li>• Economic Crime and Corporate Transparency Act 2023</li> </ul> |

## Data gaps

| Info needed | Notes |
|-------------|-------|
|             |       |



## Outline who this activity affects

| Affected groups                  | Yes/No                 |
|----------------------------------|------------------------|
| Customers                        | Yes                    |
| Residents within wider community | Yes                    |
| Involved customers               | Yes                    |
| Landlord employees / agents      | Yes, including NEDs    |
| VIVID colleagues                 |                        |
| Others – please list             | Contractors, suppliers |

## Potential impact on protected characteristics

| Protected Characteristic | Summary of potential impacts |                 |
|--------------------------|------------------------------|-----------------|
| Age                      | Positive Impact              | Negative Impact |
|                          | Neutral impact - Yes         |                 |
| Disability               | Positive Impact              | Negative Impact |
|                          | Neutral impact - Yes         |                 |



|                     |                      |                 |
|---------------------|----------------------|-----------------|
| Race                | Positive Impact      | Negative Impact |
|                     | Neutral Impact - Yes |                 |
| Religion or Belief  | Positive Impact      | Negative Impact |
|                     | Neutral Impact - Yes |                 |
| Sex                 | Positive Impact      | Negative Impact |
|                     | Neutral Impact - Yes |                 |
| Sexual orientation  | Positive Impact      | Negative Impact |
|                     | Neutral Impact - Yes |                 |
| Gender reassignment | Positive Impact      | Negative Impact |



|                               |                            |                 |
|-------------------------------|----------------------------|-----------------|
|                               | Neutral Impact - Yes       |                 |
| Marriage or Civil Partnership | Positive Impact            | Negative Impact |
|                               | Neutral Impact - Yes       |                 |
| Pregnancy and Maternity       | Positive Impact            | Negative Impact |
|                               | Neutral Impact - Yes       |                 |
|                               | Actions to Mitigate Impact |                 |



### Additional characteristics to consider

|                       |                      |                 |
|-----------------------|----------------------|-----------------|
| Literacy              | Positive impact      | Negative impact |
|                       | Neutral impact – Yes |                 |
| Socio economic status | Positive impact      | Negative impact |
|                       | Neutral impact - Yes |                 |

**Comments:** This is an internal, corporate governance policy that applies equally to all colleagues and associated persons. It sets standards on reporting and investigation of financial crime and does not create barriers or differential impacts relating to any protected characteristic



## Consultations

| Consultation completed (what, when, outcome) | Consultation needed (what, when due) |
|----------------------------------------------|--------------------------------------|
| With customers: N/A                          | With customers: N/A                  |
| With colleagues: N/A                         | With colleagues: N/A                 |

## Mitigating negative impacts

|                                                                                                           |                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Outline actions being undertaken to mitigate any potential or actual negative impact identified           |                                                                                                                                                                                             |
| Identify any further action that could be undertaken to mitigate any potential or actual negative impacts | We'll ensure routes for reporting concerns are accessible to colleagues with disabilities or differing communication needs, and materials can be provided in alternative formats on request |

## Result of EIA

| Tick 1                              | Possible Outcomes                                                                                                                                                                                                                                                     |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> | <b>No change needed:</b> there's no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.                                                                                                                            |
| <input type="checkbox"/>            | <b>Adjust the approach*:</b> EIA has identified problems and the project will be amended to ensure these problems are mitigated.*** as outlined above as recommendations in line with our corporate commitment to embed best practice throughout our service delivery |
| <input type="checkbox"/>            | <b>Continue the policy:</b> there's a potential for the policy to adversely impact some groups or help some groups more than others. However, the reasons for this can be well justified and the policy will be implemented without amendments.                       |



**Remove the policy:** EIA shows that the policy is having a discriminatory effect and should be stopped immediately.

## Continual Monitoring

### Potential triggers for early review:

We'll continue to monitor this policy to ensure is applied in practice through incident reporting, Speak Up reporting, training feedback and internal audit findings.

The policy and EIA will be reviewed earlier than scheduled if:

- An investigation highlights an equality concern or disproportionate impact
- Patterns in Speak Up or fraud reports suggest barriers to reporting
- Changes in legislation or regulatory guidance (e.g. ECCTA, AML requirements)
- Feedback indicating accessibility issues
- Internal audit identifies weaknesses related to fairness, bias, accessibility etc

**EIA approved by:** Sarah Phillips

**Date approved:** 20.02.2026

**Final copy of EIA emailed to Natalie Pearton on:** February 2026