### **Equality Impact Analysis**

### **Section 1: Introduction**

Name of proposal  For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
Council Tenant & Leaseholder Engagement Strategy
Service area and Directorate responsible
Housing Management Service [Housing & Regeneration]
Name of completing officer
Lesley Owen, Regulatory Assurance Team
Approved by (Corporate Director / Divisional Director/ Head of Service)
Darren Reynolds, Head of Regulatory Assurance
Date of approval
TBC

Where a proposal is being taken to a committee, please append the completed EIA(s) to the cover report.

# **Conclusion – To be completed at the end of the Equality Impact Analysis process**

This summary will provide an update on the findings of the EIA and what the outcome is. For example, based on the findings of the EIA, the proposal was rejected as the negative impact on a particular group was disproportionate and the appropriate actions cannot be undertaken to mitigate risk. Or, based on the EIA, the proposal was amended, and alternative steps taken.

The focus of this is to analyse the impacts of the proposal on residents, service users and the wider community that are likely to be affected by the proposal. If the proposed change also has an impact on staff, the committee covering report should provide an overview of the likely equality impact for staff, residents and service users and the range of mitigating measures proposed.

Conclusion	Current decision rating (see Appendix A)
The new strategy will shape the council's Housing Management Services' approach to engaging with all residents living in homes managed by council. It will not have any adverse or negative effects on people who identify with one or multiple protected characteristics and no further actions are recommended at this stage.	Green
The new strategy seeks to enhance and encourage council tenants and leaseholder to become more involved. The implementation of the new formal and informal mechanisms of engagement will allow tenants and leaseholders to become involved in a way that suits them and ensure that they are supported to become involved. This includes removing any barriers to participation.	Proceed
It is in the <i>delivery</i> of the Strategy where the council must ensure potential barriers to participation are mitigated. Section 5 of this EIA sets out the mitigations that the Housing Management Service will have in place to minimise and negate any adverse or disproportionate impacts during our engagement with council tenants and leaseholders who identify with a particular or multiple protected characteristics.	

# The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between those with 'protected characteristics' and those without them
- Foster good relations between those with 'protected characteristics' and those without them

This Equality Impact Analysis provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above. For more information about the Council's commitment to equality, please visit the council's website.

### **Section 2: General information about the proposal**

# Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010

This EIA sets out how the council's Tenant and Leaseholder Engagement Strategy aligns with the general equality duties and protected characteristics under the Equality Act 2010 including age, disability, gender reassignment, marriage/civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

The Act mandates that public bodies, such as local councils, must consider these characteristics in their policies and practices to prevent discrimination and advance equality.

The council's insourced housing management services previously delivered by Tower Hamlets Homes (THH) on 1 November 2023. By doing so this has integrated the council's Housing Management Service with other council services, thereby improving service standards, ensuring safety, and delivering value in housing services to council tenants and leaseholders.

The vision of the new Council Tenant and Leaseholder Engagement Strategy is to provide a wide range of opportunities for tenants and leaseholders to influence and scrutinise Housing Management Services, strategies, and policies, ensuring transparency and respect in the process. The strategy outlines commitments to improve communication, increase participation, and ensure transparency and openness to scrutiny by tenants and leaseholders.

The approach taken to engagement with our tenants and leaseholders has been developed in consideration of the statutory framework governing the regulation of social housing (the Social Housing Regulation Act (2023)) and the Equality Act (2010). The strategy aims to address the diverse needs of council tenants and leaseholders, setting out how the council will engage with them, and to ensure that they are provided with information to help them understand and hold the council as their landlord to account.

The strategy also links into the council's strategic priorities and Community Engagement Strategy, which emphasises listening to communities and involving them in decisions that affect them. New methods of engagement are being developed to ensure that council tenants and leaseholders have meaningful opportunities to influence and scrutinise the council's Housing Management Services

In summary, the proposal for the Tenant and Leaseholder Engagement Strategy is relevant to the general equality duties and protected characteristics under the Equality Act 2010 as it seeks to engage a diverse group of council tenants and leaseholders in the decision-making process, ensuring that their voices are heard and considered. The strategy aims to eliminate discrimination, advance equality of opportunity, and foster good relations among tenants and leaseholders, in line with the requirements of the Equality Act 2010.

# Section 3: Evidence (consideration of data and information)

# What evidence do we have which may help us think about the impacts or likely impacts on residents, service users and wider community?

The following data has been compiled from the Tower Hamlets Housing Management System – Protected Characteristics Summary, from June 2023. Data on council tenants is more complete than that held on leaseholders. This is partly a result of resales following the original Right to Buy and partly because a substantial proportion of the leasehold stock is sub-let with the leaseholder living elsewhere.

In addition, we have consulted with council tenants and leaseholders to gauge their support for the strategy, their feedback on whether our methods of engagement - as set out in the strategy - will make it more convenient and accessible to enable their views to be heard and to influence decisions when it comes to the management of the council homes in which they live.

In total, the council received **215** responses during a consultation exercise which was ran from 5 July – 19 August 2024.

Across all council tenants and leaseholders, **88%** of respondents felt the draft Strategy was easy to understand and showed support for how the strategy was written and presented

Further, 82% of respondents to the consultation survey agreed that the proposed methods of engagement would make it more convenient and accessible to have their voices heard and to enable them to influence decisions.

While respondents to the consultation have been encouraged to provide information around any protected characteristics with which they may identify, it is important to note that this is an elective process on the part of residents who can chose whether to disclose this information.

#### <u>Age</u>

Age range	Number of council tenants & leaseholders
18-29	713
30-39	3,150
40-49	5,557
50-64	6,867
65+	5,357
REFUSED	43
NOT KNOWN	6,526
TOTAL	28,213

Table 1 – Age range of all council tenants and leaseholders (from Housing Management Information)

Table 1 provides data held from Tower Hamlets Housing Management System which shows that most council tenants and leaseholders are aged 40+. The smallest represented age group are those aged 18-29.

However, in terms of those who responded to the consultation are high number of council tenants and leaseholders within the 18-24 age group responded in comparison to the wider number of those represented among this cohort of the wider tenants and leaseholders (Table 2)

Age	Survey	Overall
	%	
18-29	21%	3%
30-39	23%	15%
40-49	23%	26%
50-64	26%	32%
65+	7%	25%

Table 2: Age range of respondents compared to information held on the age ranges across all council tenants and leaseholders

Residents aged 50-65 years of age provided the greatest volume of responses to the survey (26%) while overall, 93% of respondents were of working age with the remaining 7% of respondents aged 65+.

The level of engagement among tenants and leaseholders aged over 65 suggests that older people in Tower Hamlets may struggle with digital literacy illustrating that there may be potential issues for this age group in terms of accessing online consultation or engagement materials. Mobility issues may also affect older people which could lead to difficulties for them in accessing live/in person events. English language skills may also be an issue for older people particularly women from a BAME background as they may struggle to access and understand materials in English. In the delivery of engagement opportunities, appropriate adjustments will be made to ensure that no age group is excluded from participating.

#### **Disability**

The number of council tenants and leaseholders for whom the council holds data on disability status for is lower than for other protected characteristics. Data on current residents indicates that 15.27% have a disability. Disability status has not been provided by 19% of residents. The prevalence of disability in households across the UK is 17.7%, this implies that Tower Hamlets council tenants and leaseholders are marginally less likely to have a member of their household with a disability, compared to the general population.

Table 3 shows from data from the council's Management Information system provided by existing council tenants and leaseholders who identify with this protected characteristic.

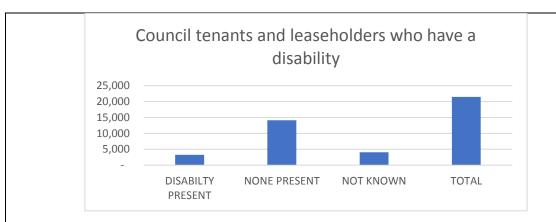


Table 3: Housing Management Data on council tenants and leaseholders who identify as having a disability

Of those who provided responses to the consultation survey on the new strategy, 18% of those who completed and provided equalities and diversity information identified as have a disability which is not dissimilar to the information the council holds on residents as a percentage in the borough's population.

The council acknowledges that there may be barriers to accessing some engagement activities for council tenants and leaseholders who have a disability. There are likely to be council tenants and leaseholders with learning difficulties who may find the engagement difficult to understand. Those with mobility issues may also find it hard to attend in-person events, as may people who experience mental health issues. People with visual impairment issues may also require adjustments to access events and written materials. The council will ensure that it makes the appropriate arrangements to ensure equal access to its engagement activities for those with any type of disability.

#### <u>Sex</u>

Information from the 2023 EDI data demonstrates that Tower Hamlets has a slightly higher proportion of females to males (Table 4)



Table 4: Information from the Housing Management Information System provided by council tenants and leaseholders on the sex they identify with

The number of council tenants and leaseholders who responded to the consultation survey had a greater level of participation among females (70%) compared to males (30%) in comparison to the representation across these two sexes in the wider council tenant and leaseholder population in the borough.

There are potential barriers to accessing engagement events or activities based on the council tenant or leaseholder's sex. In terms of council tenants and leaseholders, there are slightly more women who are heads of the household. Women in the borough, especially older women from Black, Asian, and Multi-Ethnic groups may have lower English language skills and therefore have some difficulty understanding engagement materials. The council must attempt to lower barriers to access for women. This can be mitigated by ensuring that translation and interpretation services are made available and promoted at engagement activities.

#### **Gender Reassignment**

According to the EDI data from June 2023, there are just 35 council tenants and leaseholders who have declared that their gender is not the same as at birth.

From a total of 28,213, (0.1%) of council tenants and leaseholders have confirmed that they had undergone gender reassignment, 35% have stated they had not, and the remainder declined to answer, or it is unknown. Therefore, data is only available for 35% of council tenants and leaseholders.

Reliable data is not collected for this protected characteristic.

The range of participation opportunities is open to all council tenants and leaseholders.

No impact has been identified.

The Strategy aims to ensure we provide a wide range of opportunities to ensure residents' views are heard and develop an engagement framework accessible to all.

#### Marriage and civil partnership

No data on marital or civil partnership status has been collected on council leaseholders, and for 75% of council tenants, this information is also unknown. It is important to note that a person's marital and civil partnership status may vary over time and residents often do not tell us when changes happen during their tenancy or during the lifespan of their leasehold, this data can be unreliable. From the current data available, 2,631 of council tenants are married and 5 have recorded they are in a same-sex civil partnership.

Reliable data is not collected for this protected characteristic.

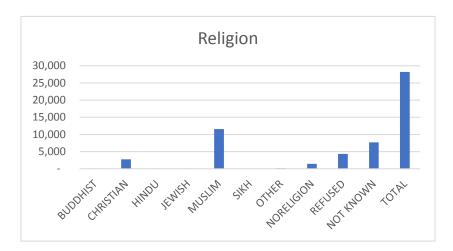
The range of participation opportunities is open to all council tenants and leaseholders regardless of marital/civil partnership status.

No impact has been identified.

The strategy aims to ensure we provide a wide range of opportunities to ensure residents' views are heard and develop an engagement framework accessible to all.

#### Religion and philosophical belief

Demographic data in Tower Hamlets suggests that the majority of council tenants and leaseholders identify as Muslim (41%). This is followed by 10% who identify as Christian, and then in far lower numbers, Hindu, Jewish, Buddhist and Sikh. 43% of council tenants and leaseholders chose not to provide this information or their religious or philosophical belief is unknown.



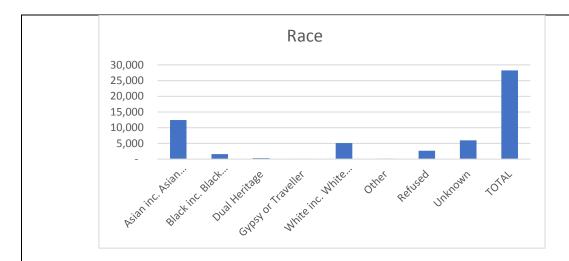
There are some implications for a tenant or leaseholder's ability to participate in the engagement activity if they practice a religion. Tenants and leaseholders in this category may be excluded from events/webinars if they occur at the same time as a religious commitment/holiday/festival. The council will endeavour to avoid any such days/times in planning engagement activities.

#### Race

The largest ethnic group which council residents identify with is Asian including Asian British, at 44%.

The second highest ethnic group which both tenants and leaseholders identify as is White including White British, at 18%.

A significant number of residents (6%) also identify as Black including Black British. The number of residents for whom data is unknown or undisclosed is quite high, at 31.



The council recognises that there is the potential for council tenants and leaseholders for whom English is not their first language who may have difficulty in understanding engagement materials. The council will adjust ensure that materials are translated where needed to allow for the equal participation of those with lower English language skills.

#### Sexual orientation

49.6% of council tenants and leaseholders identify as heterosexual. Less than 1% (0.68%) identify as lesbian, gay, bisexual, or other. 49.7% of council tenants and leaseholders chose not to disclose their sexual orientation or it was unknown. We recognise that residents may be reluctant to disclose this information and that this is an elective process on the part of the council tenant or leaseholder. The council respects the confidence given to our officers when an individual chooses to disclose this information to us.

Reliable data is not collected for this protected characteristic.

The range of participation opportunities is open to all council tenants and leaseholders regardless of sexual orientation.

No impact has been identified.

The Strategy aims to ensure we provide a wide range of opportunities to ensure residents' views are heard and develop an engagement framework accessible to all.

#### Pregnancy and maternity

The only data which the council collects for this protected characteristic is due dates for pregnancy, this is usually collected at the point of entry to the Common Housing Register and again at the point when a resident signs up for a council tenancy. The council may also become aware where a council tenant is looking to move to a property with more bedrooms. From a total of 13,814 council tenants, there are currently 4 households in which it is known that a baby is due. There is no data on this category in relation to leaseholders.

Reliable data is not collected for this protected characteristic.

The range of participation opportunities is open to all council tenants and leaseholders.

No impact has been identified.

The Strategy aims to ensure we provide a wide range of opportunities to ensure residents' views are heard and develop an engagement framework accessible to all.

#### Other

In addition to the nine protected characteristics defined in the Equality Act 2010, the council also considers the impacts of the draft Tenant and Leaseholder Engagement Strategy on the following characteristics:

#### Socio-economic status

No data is collected by the council on the socio-economic status of its council tenants and leaseholders. Borough profiling shows that 60% of the borough is still within the 30% most deprived areas of England. 29,000 employees in Tower Hamlets earn below the London Living Wage and 72% of children live in a household that receives either Child Tax Credit or Working Tax Credit.

There are several potential impacts on tenants and leaseholders from lower socio-economic backgrounds that should be considered. Those of a lower socio-economic status may have lower English language skills, or lower comprehension skills. They also may be digitally excluded due to being unable to afford internet access. The council must implement measures to ensure that they are able to access engagement and consultation materials.

Reliable data is not collected for this protected characteristic.

The range of participation opportunities is open to all council tenants and leaseholders.

No impact has been identified.

The Strategy aims to ensure we provide a wide range of opportunities to ensure residents' views are heard and develop an engagement framework accessible to all.

#### Parents and carers

There is no data held on the Tower Hamlets Housing Management system in relation to the number of tenants and leaseholders who are parents or carers. It can be assumed, however, from the number of households in which one or more members have a disability, that there are likely to be family members in households providing unpaid care. As Tower Hamlets has an estimated 74,700 children and young people aged 0-19 living in the borough, with the highest level, at 42%, of child poverty in the country, it can also be assumed that many of the council's tenants and leaseholders are parents.

There are some potential impacts on those with parental or caring responsibilities that should be considered. Parents and carers may have limited time to participate in consultation or to attend events, webinars, and other information sessions. They may also be prevented from participating at certain times – for example during school holidays or

drop-off and pick-up times. To mitigate this, the council will endeavour to avoid these times when scheduling engagement activities.

Reliable data is not collected for this protected characteristic.

The range of participation opportunities is open to all council tenants and leaseholders.

No impact has been identified.

The Strategy aims to ensure we provide a wide range of opportunities to ensure residents' views are heard and develop an engagement framework accessible to all.

#### People with different gender identities

No specific question is asked by the council in relation to gender identity, however, within the question regarding sex there is an option to select 'Other Gender Identity'. 0.01% of residents selected this option.

Reliable data is not collected for this protected characteristic.

The range of participation opportunities is open to all council tenants and leaseholders.

No impact has been identified.

The Strategy aims to ensure we provide a wide range of opportunities to ensure residents' views are heard and develop an engagement framework accessible to all.

### Section 4: Assessing the impacts on different groups and service delivery

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?	
Protected					
Age (All age groups)				The low response rate to the consultation exercise of those aged 65+ may indicate that there have been difficulties in engaging with this age group and officers will need to ensure that this cohort are able to engage and provide their opinions to inform decision making on the part of the Housing Management Service.	
				Engaging with council tenants and leaseholders of all ages will help to shape and improve the council's Housing Management Service and decision making. The strategy intends to increase opportunities for tenant and leaseholder involvement. This includes implementing, a model of engagement so that council tenants and leaseholders can get involved in a way that suits them. This will include removing any barriers to participation so all tenants have an opportunity to be represented regardless of age.	
				The strategy identifies multiple informal and informal opportunities which the Housing	

			Management Service will use to engage with council tenants and leaseholder and in different media formats to try to meet the needs and preferences of all age groups.
Disability (Physical, learning difficulties, mental health and medical conditions)			The Strategy looks to offer a variety of ways for tenants to get involved; using formal and informal mechanisms which the council will make available with varying levels of commitment and requirements which ensures tenants and leaseholders can get involved in a way that suits them. The Strategy looks to remove any disadvantage or barriers to participation, which includes any that may be because of a disability. This will include ensuring any meeting venues are accessible and local, providing a loop system at public meetings, and providing information in accessible formats. i.e. braille, large print, audio and provision of sign language services.  For events that require in person attendance, we will continue to make reasonable adjustments where needed, to ensure that all council tenants and leaseholders are able to be involved and have a voice.
Sex	×		There are no identified negative impacts on this protected characteristic.
			The delivery plan being developed in line with the engagement mechanisms being brought forward in the strategy should ensure that residents irrespective of their sex will be able to

			participate and feed into the delivery of their Housing Management Service.  When delivering our engagement opportunities, consideration will be given to what may prevent men or women from engaging, such as caring or parenting responsibilities and work patterns etc. and how these barriers to participation can be removed.
Gender reassignment			There is insufficient data to assess if there are any negative or disproportionate implications arising from this strategy on tenants and leaseholders who may identify with this protected characteristic.  The delivery plan which will be developed arising from this strategy will include actions to ensure that the Housing Management Service supports and responds to the needs of LGBTQI+ people, including those from marginalised groups, such as ethnic minorities, trans and disabled LGBTQI+ people through the activities set out within it.
Marriage and civil partnership		⊠	No particular impact has been identified for this group however increasing opportunities for engagement for all tenants will ensure that any tenant who is married or in a civil partnership is able to become involved in way that suits them.
Religion or philosophical belief			The Strategy provides a wide range of opportunities for council tenants and leaseholders to get involved which are open to all irrespective of any religion or belief that they may hold.

		Religious commitments and significant dates may make it difficult for some council tenants and leaseholders to engage with the Housing Management Service particularly when live 'in person' events or meetings are being held. The council recognises this and will take this into consideration when planning live events and meetings. Recordings of the events should also be made viewable online after the event where applicable.
Race		The Strategy aims to ensure that all tenants are represented and can become involved. This includes engaging with communities that are currently underrepresented and / or seldom heard from, particularly tenants from different black and minority ethnic communities and making every effort to accommodate cultural needs.  There is a potential that residents whose first language is not English may not be able to take part. The Housing Management Service will use interpretation and translating services to enable participation.
Sexual orientation		Insufficient data to identify if there are any negative impacts on this protected characteristic. The Strategy however aims to remove any disadvantage or barriers to participation and create adaptable solutions, which includes any that may be because of sexual orientation. This includes providing any appropriate support that may be required so that

			council tenants and leaseholders can become involved.
Pregnancy and maternity		×	Data is collected at the point of a household registering to join the Common Housing Register and at the point at which a tenant signs up to a tenancy, however unless a council tenant or leaseholder informs us of a change in their circumstances, it is difficult to infer how many council tenants and leaseholders identify with this protected characteristic.
			It may be difficult for those who are heavily pregnant or have young children to attend meetings or live events in person. The Strategy aims to remove any disadvantage or barriers to participation, which includes any that may be as a result of pregnancy or maternity. This includes ensuring there are sufficient comfort and rest breaks in meetings and providing any additional support wherever possible that may be required to meet a need.
			Engagement opportunities will be made available in the daytime, evenings and weekends to maximise council tenant and leaseholders availability. The strategy also provides that there are opportunities for formal or informal engagement and includes provision to ensure that where a tenant or leaseholder, may not have a regular amount of time available to commit but who may wish to be involved 'as and when' - where they are interested in the topic - that they are able to engage.

Other		
Socio-economic		Insufficient data to assess but the Strategy creates an engagement framework which will give a wide range of opportunities for residents to get involved, irrespective of socio-economic status.
		We know that some of our council tenants and leaseholders live in homes which are in higher deprivation areas of the borough. We anticipate that this strategy will have a positive impact as it will ensure that all council tenant and leaseholders voices will be heard and that there are a variety of ways for people to get involved.
Parents/Carers		Insufficient data to assess but no negative implications are anticipated for this resident subgroup.
		However, the Housing Management Service recognises that those who may have young children or caring responsibilities it may be difficult for them to find the time to engage with the Housing Management Service due to these commitments.
		When delivering our engagement opportunities, consideration will be given to what circumstances or situation may limit a person's ability to engage, such as work, caring or parenting responsibilities and how these barriers can be mitigated.

### Appendix 3

People with different <b>Gender Identities</b> e.g. Gender fluid, non-binary etc			Insufficient data to assess but no negative implications are anticipated for this resident subgroup.
Any other groups		⊠	No other groups have been identified who might experience an adverse or disproportionate impact.

### **Section 5: Impact analysis and action plan**

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress
	ategy has been assessed as having (or letivery of these engagement activities			
Ensure that the consultation/engagement activity is accessible to those with limited English skills.  Ensure that those with mobility issues can access the engagement events.	<ul> <li>Translation available on request during the consultation period/engagement activity</li> <li>Officers proficient in community languages in attendance to support residents</li> <li>In-person live events should be made hybrid where possible.</li> <li>Ensure accessibility of venues used</li> <li>Provision of taxis for attendance at</li> </ul>			
Ensure that those with learning difficulties can engage with written materials.	An easy read version of written materials to be made available via post and online.			
Ensure those with mental health issues that stop them from attending live events.	<ul> <li>In-person live events should be made hybrid where</li> </ul>			

	possible and recorded.  • Written materials will be made available online.
Ensure that consultation and engagement materials are available to those with visual impairments.	Provide on request     a large print version     of the materials.
Ensure those with religious commitments are not excluded from events.	<ul> <li>Ensure live events do not clash with important religious events and/or ensure events are repeated at different times and on different dates.</li> <li>Recordings of the events should also be made viewable online after the event where applicable.</li> </ul>
Ensure parents/carers are not excluded from events due to their childcare responsibilities.	<ul> <li>Ensure events take place at a wide range of times and recordings are available online where applicable.</li> <li>Provision of childcare costs for attendance at Tenants' Voice panel meetings</li> </ul>
Ensure that those facing digital exclusion are given the opportunity to participate	Provide the option     (on request) to     complete     consultation     questionnaires by     post.

on commu in Idea engage who ar access consulta	pop-up events estates, nunity hubs and lea Stores to ge residents are unable to ss ultation/engage events online.
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### **Section 6: Monitoring**

# What monitoring processes have been put in place to check the delivery of the above action plan and impact on equality groups?

Residents will be asked to answer our optional EDI questions as part of feedback from engagement events. The officer(s) responsible will be able to review the data and take appropriate measures if one or more of these groups is being negatively affected.

In addition, satisfaction with engagement will be monitored at a strategic level via our on-going satisfaction surveys.

# **Appendix A**

### **EIA decision rating**

Decision	Action	Risk
As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act and appropriate mitigations cannot be put in place to mitigate against negative impact. It is recommended that this proposal be suspended until further work is undertaken.	Suspend – Further Work Required	Red
As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.	Further (specialist) advice should be taken	Red Amber
As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Impact analysis and action plan section</i> of this document.	Proceed pending agreement of mitigating action	Amber
As a result of performing this analysis, the policy or activity does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> , and no further actions are recommended at this stage.	Proceed	Green