



Equality Impact Analysis Initial Screening Tool

Section 1.0: Background Information

Name of Completing Officer:	Tracey St Hill
Date of Initial Screening:	14 th December 2020
Service Area & Directorate:	Affordable Housing Team – Place
Head of Service:	Ann Sutcliffe

Section 2.0: Summary of policy, proposal or activity being screened

Name of policy, proposal or activity:
George Green's Almshouses - Transfer of grant payments from Right to Buy receipt following GGA's move to Charitable Incorporated Organisation status.
What are the aims / objectives of the policy, proposal or activity?
<p>George Green's Almshouses (GGA) is a registered charity that provides social housing for financially and economically disadvantaged women in Tower Hamlets. The charity is changing its status from a charitable organisation to a charity of the same name which will be constituted as a new Charitable Incorporated Organisation.</p> <p>GGA is also seeking to change its status to that of a Registered Provider. As part of the registration process, GGA requires the Council's permission and approval to transfer grant payments previously issued to them from the Council's Right to Buy receipts to the new incorporated organisation.</p> <p>This EIA Screening tool considers the impacts of the proposal being sought from Cabinet to permit GGA to transfer previously issued grant payments from the Council's Right to Buy receipts to the new Charitable Incorporated Organisation.</p>



Section 3.0: Equality Impact Analysis Test:

<p>Is there a risk that the policy, proposal or activity being screened disproportionately adversely impacts (directly or indirectly) on any of the groups of people listed below?</p> <p>Please consider the impact on overall communities, residents and Council employees.</p> <p>This should include people of different:</p>		No	Comments:
<ul style="list-style-type: none"> ▪ Sex 		X	<p>GGA provides accommodation to women with limited financial means. The change in proposed status of the GGA from a charitable organisation to a charitable incorporated organisation does not reflect a shift in the intended purpose of the accommodation, which has long been accepted by the Council. The proposal to permit the transfer of previously awarded Right to Buy receipt grants to the GGA's new charitable incorporated organisation will assist the GGA towards achieving Registered Provider status. In achieving Register Provider status, GGA will be obligated to meet the regulatory standards of a Registered Provider as set out by the Regulator of Social Housing. This will provide greater scrutiny and assurance for residents who live in GGA accommodation.</p>
<ul style="list-style-type: none"> ▪ Age 		X	<p>GGA provides accommodation for economically disadvantaged women of all ages. The proposal to permit the transfer of previously awarded Right to Buy receipt grants to the GGA's new charitable incorporated organisation will assist the GGA to achieve Registered Provider status. In achieving Register Provider status, GGA will be obligated to meet the regulatory standards of a Registered Provider as prescribed by the Regulator of Social Housing. This will provide greater scrutiny and assurance for residents who live in GGA accommodation.</p>
<ul style="list-style-type: none"> ▪ Race 		X	<p>In approving the transfer of Right to Buy receipt grants to the new Charitable Incorporated Organisation, it will benefit all residents who live in these units as the change in status to Registered Provider will bring greater regulation of GGA's activities against regulatory standards, set by the Regulator of Social Housing, affording assurance to residents who live in a GGA unit.</p>
<ul style="list-style-type: none"> ▪ Religion or Philosophical belief 		X	<p>There is no evidence to suggest that the proposal to transfer previously awarded Right to Buy Receipt grants to GGA's proposed charitable incorporated organisation will impact on a resident's religious or philosophical belief. In approving the transfer of Right to Buy receipt grants to the new Charitable Incorporated Organisation, it will only benefit all residents, irrespective of any protected characteristic which they may identify with, who live in these units. The change in status to Registered Provider will bring greater regulation of GGA's activities against regulatory standards, affording assurance to residents who live in a GGA unit.</p>
<ul style="list-style-type: none"> ▪ Sexual Orientation 		X	<p>There is no evidence to suggest that the proposal to transfer previously awarded Right to Buy Receipt grant to GGA's proposed charitable incorporated organisation will have a detrimental effect on those who identify with a particular protected characteristic. In granting the transfer of Right to Buy grants to the new Charitable Incorporated Organisation, it will only benefit all residents, irrespective of any protected characteristic which they may identify, who live in these units. The change in status to Registered Provider will bring greater regulation of GGA's activities against regulatory standards, set out by the Regulator of Social Housing, affording assurance to residents who live in a GGA unit.</p>
<ul style="list-style-type: none"> ▪ Gender re-assignment status 		X	<p>There is no evidence to suggest that this proposal will have a detrimental effect on a person due their gender re-assignment status. In approving the transfer of Right to Buy receipt grants</p>



			to the new Charitable Incorporated Organisation, it will only benefit all residents irrespective of any protected characteristic which they may identify, who live in these units. The change in status to Registered Provider will bring greater regulation of GGA's activities against regulatory standards, affording assurance to residents who live in a GGA unit.
<ul style="list-style-type: none"> People who have a Disability (Physical, learning difficulties, mental health and medical conditions) 		X	There is no evidence that to suggest that this proposal will have a detrimental effect on residents with a disability. In approving the transfer of Right to Buy grants to the new Charitable Incorporated Organisation, it will only benefit all residents, irrespective of any protected characteristic which they may identify with, who live in these units. The change in status to Registered Provider will bring greater regulation of GGA's activities against regulatory standards, affording assurance to residents who live in a GGA unit.
<ul style="list-style-type: none"> Marriage and Civil Partnerships status 		X	There is no evidence that to suggest that this proposal will have a detrimental effect on residents irrespective of their marital or civil partnership status. In approving the transfer of Right to Buy grants to the new Charitable Incorporated Organisation, it will benefit all residents, irrespective of any protected characteristic which they may identify who live in these units. The change in status to Registered Provider will bring greater regulation of GGA's activities against regulatory standards, affording assurance to residents who live in a GGA unit.
<ul style="list-style-type: none"> People who are Pregnant and Maternity 		X	There is no evidence that to suggest that this proposal will have a detrimental effect on residents who may identify with this protected characteristic. By approving the transfer of Right to Buy grants to the new Charitable Incorporated Organisation, it will be of benefit of all residents, irrespective of any protected characteristic which they may identify with, who live in these units .The change in status to Registered Provider will bring greater regulation of GGA's activities against regulatory standards, affording assurance to residents who live in a GGA unit.
<p>You should also consider:</p> <ul style="list-style-type: none"> Parents and Carers Socio and Economic status People with different Gender Identities e.g. Gender fluid, Non-Binary etc. 		X X X	There is no evidence that to suggest that this proposal will have a detrimental effect on residents who may identify with any of these characteristics. In agreeing the transfer of Right to Buy grants to the new Charitable Incorporated Organisation, it will assist GGA in its efforts to become a Registered Provider. This will benefit all residents, irrespective of any protected characteristic which they may identify with, who live in these units. The change in status to Registered Provider will bring greater regulation of GGA's activities against regulatory standards, affording assurance to residents who live in a GGA unit.

If you have answered **Yes** to one or more of the groups of people listed above, **a full Equality Impact Assessment is required.**

The only exceptions to this are listed in sections 5.1 and 5.2 of this documents.

Section 4.0: Justifying Discrimination:

Are all risks of inequalities identified capable of being justified because there is a:



(i) *Genuine Reason* for implementation

 X

(ii) The activity represents a *Proportionate Means* of achieving a *Legitimate Council Aim*

 X

(iii) There is a *Genuine Occupational Requirement* for the council to implement this activity

 X



Section 5.0: Conclusion

Before answering the next question, please note that there are generally only two reasons a full Equality Impact Analysis is not required. These are:

- 5.1 The policy, activity or proposal is likely to have **no or minimal impact** on the groups listed in section three of this document.
- 5.2 Any discrimination or disadvantage identified is **capable of being justified** for one or more of the reasons detailed in the previous section of this document.

5.3 Conclusion Details:

5.4 Do you recommend a fully Equality Impact Analysis is performed?

Yes

No

5.5 Reasons a full Equality Impact Analysis is not required:

If the Council approves the transfer of the existing grants from Right to Buy receipts to the new entity, it will enable GGA to continue its objective of providing social housing for Tower Hamlets Residents. The Primary beneficiaries of existing and any new homes will be financially disadvantaged women.

Given the difficulty of securing affordable housing to rent in the borough and the disproportionate number of women likely to be in low paid work, this will have a direct impact of the ability of GGA to support this disadvantaged group.

It will also facilitate further opportunities for GGA to invest in the provision of affordable housing rather than expose residents to the high costs of the private rented sector. The purpose of GGA has not changed, but in seeking to transfer existing grants made from Right to Buy payments, this move will contribute towards GGA's goal of attaining Registered Provider status. If GGA are successful and become a Registered Provider, this will not only be of benefit to current but also future borough residents who occupy GGA accommodation. I will also provide opportunities to access GLA grant funding thereby contributing to the delivery of more affordable homes

In achieving Registered Provider status, GGA will be required to meet the Regulator of Social Housing's published standard which concern:

- **Governance and Financial Viability** - which ensures effective governance and resource management to deliver long-term financial viability
- **Value for Money** - to obtain best value from assets and resources
- **Rent Charge** - charge rent in line with Government rules
- **Home** - keep homes safe, decent and in a good state of repair
- **Tenancy** – let homes and manage tenancies in a fair, transparent and efficient way
- **Neighbourhood and Community** - keep the wider area clean and safe, help to tackle anti-social behaviour and promote community wellbeing.
- **Tenant Involvement and Empowerment** - understand and respond to the diverse needs of tenants, provide choice and opportunities for involvement, resolve complaints fairly and promptly

This will be advantageous to all residents irrespective of any protected groups that they identify with and if this proposal is agreed, it will allow GGA to continue with its ambition to achieve Registered Provider status which will if successful, will entail a continuing obligation to comply with the Regulator of Social Housing's requirements as listed above. Following Grenfell and the recently published White Paper 'The Charter for social housing tenants', (December 2020), the focus of the Social Housing sector is to provide greater transparency and accountability to tenants. Although GGA have less than 1,000 units of accommodation, and would therefore not be subject to many of the proposed changes in the White Paper, if Registered Provider status is granted, this will enhance resident's confidence in GGA and facilitate some assurance of their purpose and intentions as providers of social housing.



Section 6.0: Sign Off:

Signed

Date:

Name:

Position: