

## Appendix 3: Equalities Impact Analysis Screening – Residents (Tenants & Leaseholders)

### Section 1: Background information

Name of completing officer	Date of screening
Alice Jones, National Management Trainee and Nicola Klinger, Programme Lead – Housing Management Review	11/01/2023
Service area and Directorate responsible	
Housing Management Review Programme - Housing and Regeneration	
Approved by (Director / Head of Service)	Date of approval
Karen Swift, Director of Housing & Regeneration	16/01/2023

The Equality Act 2010 places a ‘General Duty’ on all public bodies to have ‘due regard’ to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with ‘protected characteristics’ and those without them
- Fostering 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: Summary of proposal being screened

For the purpose of this document, ‘proposal’ refers to a policy, function, strategy or project

Name of proposal
Proposal to bring housing management services back in-house, under the direct control of the Council.

### The aims/objectives of the proposal

The Council is proposing to bring housing management services back in-house, under the direct control of the Council.

The current Management Agreement between Tower Hamlets Homes (THH) and the Council ends on 31 March 2024 (with a possible extension of a further four years). The Council must take a decision on whether to extend the management agreement no later than six months prior to this date.

Having reviewed the options for the future of housing management services, the Council has assessed that bringing services back in-house will provide an opportunity to join up services, increase accountability to residents and the Regulator for Social Housing (RSH), and enable the Council to take a strategic approach to delivering good quality homes.

This Equality Impact Analysis screening will look at whether the above proposal is likely to have a disproportionate adverse impact on any residents based on their protected characteristics. It will also explore if there are potential benefits that might be achieved for specific groups as a result of the proposal.

## Section 3: Equality Impact Analysis screening

<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, service users and Council employees.</p> <p>This should include people of different:</p>	Yes	No	Comments
<ul style="list-style-type: none"> <li>▪ Sex</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>There will be no reduction in housing management services available to residents based on their sex. Where service integration projects are planned and when organisational structures are finalised, a full EIA will be completed.</p> <p>In the consultation response, there was no indication that any group held a different view to the general trend</p>

		<p>(in agreement for the proposal to insource housing management services) based on their sex. This indicates that no group from this protected characteristic feels that the proposal may disproportionately impact them.</p>
<ul style="list-style-type: none"> <li>▪ <b>Age</b></li> </ul>	<input checked="" type="checkbox"/>	<div style="display: flex; align-items: flex-start;"> <input type="checkbox"/> <div style="margin-left: 10px;"> <p>People of all ages will continue to receive the same level of service following the insourcing of housing management functions. Where the Council identifies opportunities to integrate services and when organisational structures are finalised, a full EIA will be completed to ensure no age group is disproportionately impacted.</p> <p>There was support for insourcing housing management services across all age groups in the consultation response, indicating that no group felt the changes would negatively impact them.</p> <p>There is a risk of disruption to service delivery during the transfer of services from the ALMO back into the Council. Some older people may be at greater risk of negative impacts, due to their increased vulnerability relative to other groups and existing barriers to accessing services due to mobility issues or digital exclusion. This must be carefully monitored on an ongoing basis, and the relevant mitigations implemented.</p> <p>Once the transfer is complete, however, there could be some benefits for people of all ages, particularly those who access a greater number of Council services, likely children, and older people.</p> <p>Service integration and occupying a shared space in the Whitechapel Town Hall would offer opportunities for closer working between housing</p> </div> </div>

			and age-specific services, such as children's services or support for older persons. It will be possible to assess the scope and impact of these changes following the completion of the transfer.
<ul style="list-style-type: none"> <li>▪ <b>Race</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>All residents will continue to receive the same level of service regardless of their race. There may be options for service integration that could impact on residents of different races in different ways, so a full EIA will be completed when organisational structures are finalised and all proposals for service integration projects will be accompanied by a full EIA to ensure there is no direct or indirect discrimination against members of any racial group.</p> <p>In the consultation response, there was a broad representation of participants from different racial groups. There was no specific racial group which indicated a different view to the general trend (support for bringing housing management services back in-house). This indicates that no racial group is opposed to the proposal on the grounds that it would negatively impact them.</p>
<ul style="list-style-type: none"> <li>▪ <b>Religion or Philosophical belief</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>People with religious or philosophical beliefs will not experience a reduction in services due to the transfer. When organisational structures are finalised and if service integration projects are subsequently proposed, a full EIA will be undertaken to ensure that people within this category are accounted for.</p> <p>Residents with a range of religious and philosophical beliefs responded to the consultation. There is broad support for insourcing across religious and philosophical groups. None appeared to think that the proposal would directly or indirectly</p>

			discriminate against them due to their beliefs.
<ul style="list-style-type: none"> <li>▪ <b>Sexual Orientation</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>There will be no reduction in services for people of any sexual orientation due to the transfer of housing management services back in-house under the direct control of the Council. There may be proposals for integration of services that could have an impact on groups in this category. A full EIA will be completed in every case, as well as when organisational structures are finalised, and any necessary mitigations implemented.</p> <p>In the consultation response, there was no sexual orientation group that was in overall disagreement with the proposal to insource housing management services, indicating that groups within this category do not feel that the proposal will negatively affect them.</p>
<ul style="list-style-type: none"> <li>▪ <b>Gender re-assignment status</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>There will be no reduction in services for anyone due to their gender re-assignment status. Where service integration projects are proposed, a full EIA will be completed by that service, accounting for the challenges people who undergo gender reassignment face when accessing services.</p> <p>People who identified with a status of gender reassignment in their consultation response did not indicate a different view to the general trend (support for the proposal to insource housing management services). This indicates that residents with gender reassignment status do not feel that the proposal will disproportionately adversely impact them.</p>
<ul style="list-style-type: none"> <li>▪ <b>People who have a Disability</b></li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>People with disabilities may access a wide range of council services across their lives. The proposal to insource</p>

<p>(physical, learning difficulties, mental health and medical conditions)</p>		<p>housing management functions will not cause a reduction in these services. When organisational structures are finalised, an EIA will be completed and any service integration projects will be accompanied by a full EIA to ensure that changes to service delivery will not negatively impact on people with disabilities.</p> <p>In the consultation response, people who stated that their day-to-day activities were limited by a disability or health problem did not indicate a different view to the general trend, which agreed with bringing services back in-house. This was also true across all the categories of disability, with no group who specified that they were living with one or more disability (physical, learning difficulties, mental health, medical conditions or a specified other) responding in overall disagreement with the proposal. This suggests that groups who identify as having a disability do not feel that the proposal will disproportionately negatively affect them.</p> <p>There is a risk of disruption to the delivery of services during the transfer period. This will be heavily monitored and mitigated against, but some people with disabilities may be at a greater risk of being impacted by this due to their increased vulnerability relative to other groups. As there are already barriers for this group to access council services, these mitigations must account for a range of challenges that could be experienced when accessing services.</p> <p>Once the transfer is complete, however, it is anticipated that there could be some long-term benefits for people with disabilities. Service integration and improved</p>
--	--	--

			<p>communication resulting from insourcing housing management functions could provide a more streamlined customer journey. These changes might also enable the council to share information and resources to better tailor services to the individual needs of residents with disabilities. The transfer could also make it easier for residents with disabilities to tell the council what they need. Once the transfer is complete and a bedding-in period has passed, the scope and impact of these changes can be fully assessed.</p>
<ul style="list-style-type: none"> <li>▪ <b>Marriage and Civil Partnerships</b> status</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>There will be no reduction in services for residents who are married or in civil partnerships, resulting from the transfer. Where service integration projects are proposed and when organisational structures are finalised, a full EIA will be completed to account for this group.</p> <p>The consultation indicated that residents were broadly in support of the Council's proposal to insource housing management services, regardless of their marriage or civil partnership status. This indicates that a resident's marital or civil partnership status had no significant bearing on how they might respond to the proposal.</p>
<ul style="list-style-type: none"> <li>▪ People who are <b>Pregnant</b> and on <b>Maternity</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Women may access a greater number of council services while pregnant or on maternity. There will be no changes to how they access these services because of the transfer, or any reduction in the services they access. There may be service integration opportunities during the transfer that could impact on women who are pregnant and on maternity. A full EIA would be completed alongside any integration plans and when organisational structures are finalised, to mitigate</p>

		<p>against adverse impacts on this group.</p> <p>Responses from women who identified that they were pregnant or on maternity did not differ from the general trend. This indicates that this group does not feel that the proposal will have a disproportionate adverse impact on them.</p> <p>Changes made during and following the transfer could make it easier for women who are pregnant or on maternity to access council services. It will be possible for housing to work more closely with other services accessed by this group, to make it easier for residents to get what they need. Following the completion of the transfer and a bedding-in period, it will be possible to assess the extent to which the changes will benefit members of this group.</p>
<p>You should also consider:</p> <ul style="list-style-type: none"> <li>▪ <b>Parents and Carers</b></li> <li>▪ <b>Socio-economic</b> status</li> <li>▪ People with different <b>Gender Identities</b> e.g. Gender fluid, Non-binary etc.</li> <li>▪ Other</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/> <p>There will be no reduction in services for any of the groups in this category resulting from the insourcing of housing management services. Where service integration projects are considered and when organisational structures are finalised, a full EIA will be completed, accounting for the needs of all these groups.</p> <p>Parents and carers will often have to consider how changes to services may impact not only themselves, but also their dependents. Despite this, consultation responses from parents and carers showed broad support for the proposal to insource. This suggests that people from these groups do not feel that they, or those relying on them for care, will be adversely impacted by the transfer. This was also true for those who identified themselves as having a different gender identity. The consultation did not collect data on</p>

		<p>the socio-economic status of respondents.</p> <p>Once the transfer is complete, however, there may be some benefits for parents and carers, with closer working between housing and the support services they access, for themselves and their dependents, lowering barriers to access.</p> <p>There may also be benefits for people with a lower socio-economic status. As this group is likely to access more council services across their lives, they could benefit from council services being more closely joined-up, with better information and resource sharing. It might also be easier for them to communicate to the council how it could best respond to their needs.</p>
--	--	---

If you have answered **Yes** to one or more of the groups of people listed above, a **full Equality Impact Analysis is required**. The only exceptions to this is if you can 'justify' the discrimination (Section 4). **If there are equality impacts on Council staff please complete the restructure equality impact analysis on the ['Organisational change process' pages of the intranet](#).**

## Section 4: Justifying discrimination

Are all risks of inequalities identified capable of being justified because there is a:	
(i) <i>Genuine Reason</i> for implementation	<input type="checkbox"/>
(ii) The activity represents a <i>Proportionate Means</i> of achieving a <i>Legitimate Council Aim</i>	<input checked="" type="checkbox"/>
(iii) There is a <i>Genuine Occupational Requirement</i> for the Council to implement this activity	<input type="checkbox"/>

## Section 5: 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:

- The policy, activity or proposal is likely to have **no or minimal impact** on the groups listed in section three of this document.

- 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.

## Conclusion details

Based on your screening does a full Equality Impact Analysis need to be performed?

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

If you have answered **YES** to this question, please complete a full Equality Impact Analysis for the proposal

If you have answered **NO** to this question, please detail your reasons in the 'Comments' box below

Comments
<p>Although this screening tool has identified that a full Equality Impact Analysis should be completed, there will be no reduction in services for people in any group resulting from the insourcing of housing management functions. There is, however, a risk of some service disruption during the transfer. Although extensive monitoring and mitigations will be undertaken, there are certain vulnerable groups, such as those with disabilities or those who are elderly, which may be at a higher risk of suffering negative impacts from any potential service disruption.</p> <p>As the proposal is still at a relatively formative stage, it would be more useful for a full EIA to be completed once there are more detailed proposals on service structures and the target operating model. This will enable the EIA to account for specific risks to disruption for each service, and tailor mitigations accordingly. It will also be possible to identify potential benefits for different protected groups.</p>