

# Appendix D: Equalities Impact Analysis Screening – The piloting of x2 new schemes 1) Cost of Living Grant and 2) Find your own PRS Accommodation Grant

## Section 1: Background information

Name of completing officer	Date of screening
Una Bedford, Senior Strategy and Policy Officer	7 January 2024
Service area and Directorate responsible	
Housing Management & Procurement, Housing and Regeneration	
Approved by (Director / Head of Service)	Date of approval
Karen Swift, Director of Housing	

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

Approval of two pilot schemes:

1. Cost of Living Grant Scheme
2. Find Your Own PRS Accommodation Grant

### The aims/objectives of the proposal

The council is proposing to pilot two new schemes, the Cost of Living Grant and the Find Your Own PRS (Private Rented Sector Accommodation) Grant.

#### **Cost of Living Grant**

The Cost of Living Grant provides a cash grant to hosts to allow family members (non-dependents who could be adult children or other extended family members) to remain in the host's household – where the host is evicting family members as a consequence of the continued cost of living pressures that householders face.

The availability of this grant may help to stem the flow and contribute to the reduction in costs associated with the council placing those to whom it owes a housing duty into expensive statutory temporary accommodation.

#### **Find Your Own PRS Accommodation Scheme**

The Find Your Own PRS Accommodation Grant will be delivered by the Housing Options Service, who proactively work with households who are threatened with homelessness, to help them to secure accommodation in the PRS, before they become homeless.

The main purpose of the Find Your Own PRS Accommodation Grant scheme, is to prevent homelessness and to achieve a better outcome for households who are threatened with homelessness, by avoiding the need for them to have to access emergency temporary accommodation (bed and breakfast or commercial hotel accommodation) and to empower residents to secure accommodation which is suitable and affordable for them.

Through the scheme, households will be enabled to access support and resources to secure a property in the PRS, which they are able to choose for themselves. In the main, this will assist residents at risk of homelessness. In addition, residents currently placed in Temporary Accommodation will also be encouraged to utilise this scheme.

## 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>Applicants irrespective of their gender will benefit from the piloting of both of these grant schemes.</p> <p>Female applicants in particular represent a greater proportion of residents who the Housing Options Service supports in the provision of temporary accommodation and moves into the PRS from Temporary Accommodation.</p> <p>Gender is an issue in relation to economic status with women being adversely affected. National, London-wide and local level research indicates women earn less than their male counterparts and have a higher representation in economically inactive households, largely explained by the take up of care roles. The trends described and the notable 'gender pay-gap' affects women's ability to access affordable housing in the borough and places women at greater risk of homelessness.</p> <p>The FYO PRS Accommodation grant may remove the financial barriers that residents face in finding and maintaining a tenancy in the PRS, particularly where we are unable to find suitable move-on PRS accommodation in the borough. The grant will empower and provide financial relief in the costs related to securing accommodation in the PRS.</p>

<ul style="list-style-type: none"> <li>▪ <b>Age</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Both grant schemes are available to residents over working age.</p> <p>For residents under the age of 35, who are single or couples without children, they may have difficulties if they are in receipt of Local Housing Allowance (LHA) to source PRS accommodation which is affordable within the borough. This is because they can only receive the Single Room Rate of LHA. These residents will benefit from the incentivisation of hosts through the Cost of Living Grant to allow non-dependents to remain in the property.</p> <p>This will negate any financial obstacle which places a resident at risk of homelessness where friends and family who host the resident are no longer willing or able to accommodate them. It should ensure that residents living in host households do not become roofless as a result of the cost of living crisis and negate their need for accommodation to be found by the Housing Options Service, in turn helping to alleviate the financial costs to the council in the delivery of this service.</p> <p>Residents who successfully apply for the Find Your Own Scheme will have additional financial assistance to source their own PRS accommodation giving them an element of choice as to where they chose to move to. As the FYO PRS Accommodation Grant can cover expenses associated with finding and moving into PRS Accommodation, this may provide further financial relief to residents to residents who have no choice but to move out of the borough with the additional associated expenses this may bring.</p>
<ul style="list-style-type: none"> <li>▪ <b>Race</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Data from the Housing Options Service demonstrates that the demographics on race and ethnicity among residents who approach because they are at risk of, or, who become homeless is very much in keeping with the demographic of the wider population in Tower Hamlets. Both of these grant's schemes will be considered on a case by case basis and applicants who are eligible for assistance under either of these schemes will benefit from such an award.</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 be negatively impacted by the introduction and piloting of these two new grant schemes.</p>

			<p>The council recognises that religious households are supported by the communities that they live in, and it is important to ensure that wherever an individual or household resides that the communities that we are placing into are supportive and sufficiently diverse. All requests for funding from these two grant schemes will be assessed on their merits.</p> <p>The FYO PRS Accommodation support will assist residents to settle into their new home and will help residents to adjust to their new area.</p>
<ul style="list-style-type: none"> <li>▪ <b>Sexual Orientation</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Like all residents who identify with any one or number of protected characteristic, residents who identify as LBGTQ+ will benefit from the intended outcomes of both of these pilot grant schemes.</p>
<ul style="list-style-type: none"> <li>▪ <b>Gender re-assignment status</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>People who identified as in the process of, or who have undergone gender reassignment will not be negatively impacted by the piloting of these two Grant Schemes and will be able to apply for these funds to support them to remain in their current households or to source alternative PRS accommodation on their terms.</p> <p>All requests for assistance from these grant schemes will be considered on a case by case basis on their own merits.</p>
<ul style="list-style-type: none"> <li>• People who have a <b>Disability</b>(physical, learning difficulties, mental health and medical conditions)</li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Residents who have identified as having severe disabilities and or health, mental health conditions are more likely to be directly offered council accommodation and/or meet high priority banding within the council and its partner's Common Housing Register Allocations scheme.</p> <p>The Cost of Living Grant will enable those residents whose disabilities are less severe to remain in the host's home.</p> <p>If a resident at risk of homelessness or needing to move-on from temporary accommodation identifies with this particular characteristic, the additional costs that the FYO PRS Grant scheme will cover may give the resident greater financial choice as they move on from Temporary Accommodation and relieve the worries of the additional financial costs associated with securing PRS accommodation.</p>
<ul style="list-style-type: none"> <li>▪ <b>Marriage and Civil Partnerships status</b></li> </ul>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Residents irrespective of their marital or civil partnership status will benefit from the piloting of both of these grant schemes. Each request</p>

			for assistance from these two grant schemes will be considered on a case by case basis on their own merits.
<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>Residents who identify with this protected characteristic will benefit from the Cost of Living Crisis Grant because it will enable the resident to remain in their current home, particularly important where the resident is reliant on the support of household members during and after their pregnancy.</p> <p>This protected group will also benefit from the FYO PRS Accommodation scheme as they will be able to use the funds associated to meet the costs of moving and the associated costs of resettling into a new area.</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>Single parent or carers who may have only one source of income may struggle with the financial costs of moving home or may need additional financial support to find accommodation that meets their needs.</p> <p>The FYO PRS Accommodation Grant may remove any additional financial costs that might dissuade a resident from sourcing accommodation in the PRS. Where a household is unable to remain in the borough and the household includes children, new school uniforms will be needed if the move means that children need to change schools. The grant can also be used to support families in taking part in social and supporting activities in their new area to make the transition into their new local area smoother.</p> <p>Similarly, those who are hosted by another household may find that the Cost of Living Grant enables them to remain in their current home and they may be able to retain the existing support network that they have in their current home.</p> <p>There is a lack of data concerning residents who identify as having 'other' identities but those who may want to remain in the family home but are threatened with eviction as a result of the cost of living crisis may benefit from remaining in the family home, particularly where the source of tension is derived from the household costs arising from the national cost of living crisis.</p>

		Similarly, if the resident needs to source accommodation in the PRS, they may be able to exert choice into where they move to and will be able to negate the additional financial costs associated with moving and settling into the PRS accommodation that they have secured.
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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 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 type="checkbox"/>	<input checked="" 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

Householders currently providing accommodation for friends or relatives do not receive financial help associated with having long-term guests. Financial assistance to meet these costs at a time when household budgets are already overstretched could help to sustain hosting arrangements and prevent and reduce the incidence of family and friends no longer willing or able to allow a homeless applicant or household to remain in the property.

The Find Your Own PRS Accommodation Schemes empowers residents to take ownership and control over their housing options with more flexibility and choice in terms of the location and type of property they are able source in the PRS. Those residents who receive a "Find Your Own" Grant payment should see the payment help to reduce any financial barriers which prevented a resident from securing and settling into a new PRS tenancy. This in turn should minimise the risk of the tenancy breaking down.

The Grant also encourages households to take pride in their new home and supports long-term tenancy sustainment and fundamentally aims to reduce the risk of repeat homelessness which is costly to the council and disruptive to the resident and their household.

The use and payment of both grants will be considered and managed in line with Tower Hamlets Adult Safeguarding procedures to ensure minimal risk of harm or exploitation to vulnerable individuals and families. Any concerns raised or noted regarding a particular individual or family will be considered on a specific case-by-case basis.