



## Equalities Committee

**Monday 19 February 2018 at 6.00 pm**

Boardroom 4 - Brent Civic Centre, Engineers Way,  
Wembley HA9 0FJ

### Membership:

#### Members

Councillors:

McLennan (Chair)  
Davidson (Vice-Chair)  
Harrison  
Mashari  
Thomas

#### Substitute Members

Councillors:

Conneely, Crane, Hoda-Benn and Hylton  
  
Councillors:  
Maurice and Warren

**For further information contact:** Nikolay Manov, Governance Officer  
Tel: 020 8937 1348; Email: [nikolay.manov@brent.gov.uk](mailto:nikolay.manov@brent.gov.uk)

For electronic copies of minutes, reports and agendas, and to be alerted when the minutes of this meeting have been published visit:  
**[www.brent.gov.uk/committees](http://www.brent.gov.uk/committees)**

**The press and public are welcome to attend this meeting.**

## **Notes for Members - Declarations of Interest:**

If a Member is aware they have a Disclosable Pecuniary Interest\* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent and must leave the room without participating in discussion of the item.

If a Member is aware they have a Personal Interest\*\* in an item of business, they must declare its existence and nature at the start of the meeting or when it becomes apparent.

If the Personal Interest is also a Prejudicial Interest (i.e. it affects a financial position or relates to determining of any approval, consent, licence, permission, or registration) then (unless an exception at 14(2) of the Members Code applies), after disclosing the interest to the meeting the Member must leave the room without participating in discussion of the item, except that they may first make representations, answer questions or give evidence relating to the matter, provided that the public are allowed to attend the meeting for those purposes.

### **\*Disclosable Pecuniary Interests:**

- (a) **Employment, etc.** - Any employment, office, trade, profession or vocation carried on for profit gain.
- (b) **Sponsorship** - Any payment or other financial benefit in respect expenses in carrying out duties as a member, or of election; including from a trade union.
- (c) **Contracts** - Any current contract for goods, services or works, between the Councillors or their partner (or a body in which one has a beneficial interest) and the council.
- (d) **Land** - Any beneficial interest in land which is within the council's area.
- (e) **Licences**- Any licence to occupy land in the council's area for a month or longer.
- (f) **Corporate tenancies** - Any tenancy between the council and a body in which the Councillor or their partner have a beneficial interest.
- (g) **Securities** - Any beneficial interest in securities of a body which has a place of business or land in the council's area, if the total nominal value of the securities exceeds £25,000 or one hundredth of the total issued share capital of that body or of any one class of its issued share capital.

### **\*\*Personal Interests:**

The business relates to or affects:

(a) Anybody of which you are a member or in a position of general control or management, and:

- To which you are appointed by the council;
- which exercises functions of a public nature;
- which is directed is to charitable purposes;
- whose principal purposes include the influence of public opinion or policy (including a political party of trade union).

(b) The interests a of a person from whom you have received gifts or hospitality of at least £50 as a member in the municipal year;

or

A decision in relation to that business might reasonably be regarded as affecting, to a greater extent than the majority of other council tax payers, ratepayers or inhabitants of the electoral ward affected by the decision, the well-being or financial position of:

- You yourself;
- a member of your family or your friend or any person with whom you have a close association or any person or body who employs or has appointed any of these or in whom they have a beneficial interest in a class of securities exceeding the nominal value of £25,000, or any firm in which they are a partner, or any company of which they are a director
- any body of a type described in (a) above

# Agenda

Introductions, if appropriate.

Item	Page
<b>1 Apologies for absence and clarification of alternate members</b>	
<b>2 Declarations of interests</b> Members are invited to declare at this stage of the meeting, any relevant disclosable pecuniary, personal or prejudicial interests in the items on this agenda.	
<b>3 Deputations (if any)</b> To hear any deputations received from members of the public in accordance with Standing Order 67.	
<b>4 Minutes of the previous meeting</b> To approve the minutes of the previous meeting as a correct record.	1 - 8
<b>5 Matters arising (if any)</b> To consider any matters arising from the minutes of the previous meeting.	
<b>6 Modern Slavery</b> Members will hear the 'Modern Slavery in London - Your Duty to Identify and Protect Victims' presentation by Tamara Barnett from the Human Trafficking Foundation.	
<b>7 Accessibility Audit Report</b>  This report presents the findings of a review commissioned by the previous Equalities Team on the accessibility of frontline Council services.	9 - 20

**Wards Affected:** All Wards  
**Contact Officer:** Adina Maglan, Equalities Officer  
Email: [adina.maglan@brent.gov.uk](mailto:adina.maglan@brent.gov.uk)  
Tel: 020 8937 3153

## 8 Impact and equality analysis of the Overall Benefit Cap

21 - 48

The report provides details of the actual impacts on residents of the reduced cap, and briefly outlines the steps taken to offer support and services to residents affected.

**Ward Affected:**  
All Wards

**Contact Officer:** David Oates  
Head of Customer Services and Benefits  
Email: [david.oates@brent.gov.uk](mailto:david.oates@brent.gov.uk)  
Tel: 020 8937 1931

## 9 Homelessness Reduction Act: Equality Impact Analysis

*To follow.*

**Ward Affected:**  
All Wards

**Contact Officer:** Laurence Coaker, Head of  
Housing Needs  
Email: [laurence.coaker@brent.gov.uk](mailto:laurence.coaker@brent.gov.uk)  
Tel: 020 8937 2788

## 10 Progress update on Brent's 2017/18 Equality and Diversity Action Plan 49 - 52

The item provides the Committee with a progress update on the 2017/18 Equality and Diversity Action Plan.

**Wards Affected:**  
All Wards

**Contact Officer:** Adina Maglan, Equalities Officer  
Email: [adina.maglan@brent.gov.uk](mailto:adina.maglan@brent.gov.uk)  
Tel: 020 8937 3153

## 11 Achievements of the Equalities Committee (verbal update)

Members will hear an update on the achievements of the Equalities Committee since its establishment in July 2015.

**Ward Affected:**  
All Wards

**Contact Officer:** Pascoe Sawyers, Head of  
Strategy and Partnerships  
Email: [pascoe.sawyers@brent.gov.uk](mailto:pascoe.sawyers@brent.gov.uk)  
Tel: 020 8937 1045

## 12 Any other urgent business

Notice of items to be raised under this heading must be given in writing to the Head of Executive and Member Services or his representative before the meeting in accordance with Standing Order 60.



Please remember to **SWITCH OFF** your mobile phone during the meeting.

- The meeting room is accessible by lift and seats will be provided for members of the public.



## MINUTES OF THE EQUALITIES COMMITTEE Tuesday 12 September 2017 at 6.00 pm

**PRESENT:** Councillors McLennan (Chair), Harrison, Maurice and Thomas

Absent: Councillor Mashari

### 1. **Apologies for absence and clarification of alternate members**

The Governance Officer informed the Committee that the Chair had been delayed and it was **RESOLVED** that Councillor Thomas would chair the meeting until the arrival of Councillor McLennan.

*Councillor Thomas took the chair.*

Apologies for absence were received from Councillor Davidson, with Councillor Maurice being present as substitute.

### 2. **Declarations of interests**

There were no declarations of Interests made by Members.

### 3. **Deputations (if any)**

None.

### 4. **Minutes of the previous meeting**

**RESOLVED** that the minutes of the previous meeting, held on 2 May 2017, be approved as an accurate record of the meeting.

### 5. **Matters arising (if any)**

Members of the Committee enquired about the Harlesden Hub and the Eastern European Fair which had taken place on 17 June 2017. Peter Gadsdon (the Council's Director of Performance, Policy and Partnerships) informed the Committee that the Harlesden Hub was providing support to residents to access services delivered by the Council and its partners. In relation to the Eastern European Fair, Andreyana Ivanova (the Council's Head of Equality) explained that a comprehensive update would be provided under item eight to the agenda.

Ms Ivanova invited Members to an event to celebrate Black History Month on 26 October 2017.

### 6. **Progress update on Brent's Digital Strategy (presentation delivered on the day)**

Peter Gadsdon (the Council's Director of Performance, Policy and Partnerships) introduced Ms Abigail Malley (Digital Strategy Officer as part of the Civil Service

Fast Stream scheme) and delivered a presentation on Brent's Digital Strategy. The Committee heard that the Strategy had been agreed by the Cabinet in June and six million pounds over the course of two and half years had been allocated to transform the way services were delivered. Mr Gadsdon said that the digital revolution had left the most vulnerable residents excluded so the Strategy covered issues such as technical and digital offers to access services, the rollout of assistive technology (AT) at residents' homes and making Brent a digital place where infrastructure would provide connectivity for residents and businesses.

*Councillor McLennan entered the meeting at 6:08 pm and took the chair.*

Mr Gadsdon pointed out that age was the main indicator of digital exclusion and spoke about the negative correlation between people's age and their desire and ability to use digital technology, but acknowledged that this would be less of a barrier over time. In addition, Mr Gadsdon said that one in seven residents had a disability limiting their activities, which combined with the fact that 11% of Brent's population was aged 65 and over, meant that focus had to be placed on this group of people to help them access services. He said that an important part of making Brent a digital place was helping residents feel more confident and supported which could be achieved by working with the Community and Voluntary Sector (CVS), via community hubs, and through the increased provision of self-service. However, Mr Gadsdon stressed that face-to-face contact would never be removed as the Council acknowledged the need to provide support people directly in some circumstances.

As far as connectivity was concerned, he informed the Committee that the Council was looking into ways to provide WiFi to housing estates, which led to a question about the technology used to ensure this. In response, Mr Gadsdon said that Closed Circuit Television (CCTV) cameras could be used as broadband routers and said that the Strategy looked into alternatives that private providers could not or would not provide. In addition, Ms Malley noted a special team had been set up to address the lack of connectivity in certain areas of Brent and they would bid for funding to address this issue.

Mr Gadsdon gave examples of projects delivered as part of the Strategy – the introduction of homelessness reduction customer relationship management (CRM); the digital offer to foster carers; telehealth; the improvement of the digital offer for school admissions; borough-wide digital skills development, etc. The Committee heard that the Digital Strategy was due for renewal in 2020 by when the majority of the projects would have been delivered.

Members of the Committee commented on the experience of using the Council's automated switchboard system and expressed their concerns related to the voice recognition system and the need to add an 'operator' option which would connect the caller to a member of staff. In response, Councillor McLennan said that Cabinet had approved the award of the contract for the provision of telephony services, including the automated call distribution system (ACD). Carolyn Downs (the Council's Chief Executive) said that using webchat might be better than calling the switchboard as enquires would be resolved quicker and residents would know the outcome immediately. Mr Gadsdon commented that people had to be pointed to the channel that would provide them with the best service, which meant that the Council's webpage had to be easy to navigate. This led to a discussion about the need for an application for residents of the former Brent Housing Partnership

(BHP), who would like to use technology to report maintenance issues. Members heard that a big investment in CRM software would be made to deliver a new offer to BHP residents. As far as the engagement of young people in designing digital services was concerned, Ms Malley said that there had been conversations with the Children and Young People Department how to engage with schools and involve them in application development and design.

In relation to a suggestion for the creation of a technology park in Brent, Ms Downs explained that the Council explored different options in this direction. However, this depended on who owned the land and informed the Committee that despite the broadband in Brent being better than other areas of London, some companies preferred certain postcodes.

**RESOLVED that:**

- (i) The Progress update on Brent's Digital Strategy be noted; and
- (ii) An update on the implementation of the Strategy be provided at a future meeting of the Committee.

**7. European Union Referendum Implications for Brent**

Mark Cairns (the Council's Policy and Scrutiny Manager) introduced the report which provided an update on developments since the 'European Union Referendum and the Impact of Uncertainty on European Union Nationals Living in Brent' report had been presented to the Committee in February 2017. Mr Cairns said that the outcome of the negotiations was going to have a huge impact on European Union (EU) nationals living and working in Brent as well as on the economic health of the United Kingdom (UK) and Brent. Although the official position of the UK was that EU residents already living in the country would be offered a settlement status, no cut-off date had been set after which anyone arriving in the UK would need to apply for a work permit or return to the EU. Moreover, despite the fact that free movement of people was expected to end in 2019, it had not been clear what immigration arrangements would replace it. In relation to EU-derived law, Mr Cairns said that The European Union (Withdrawal) Bill would enshrine all existing law into UK law at the point of Brexit, following which this would be reviewed and amended by Parliament. The Council would be able to lobby and influence the review and there might be opportunities for further devolution.

The Committee heard that structural funds would cease in December 2018 – Brent was part of two projects receiving EU funding, through the European Social Fund, so alternative funding had to be secured to continue beyond this point. In addition, any economic downturn would have a negative impact on the income generated through business rates.

Members of the Committee enquired whether the Council could write to government officials and Members of Parliament to emphasise that as a result of Brexit, the quality of life for the people living in Brent had deteriorated. In response, Carolyn Downs (the Council's Chief Executive) advised Councillors that there was nothing stopping the Council to raise the issue and added that the Greater London Authority (GLA) and the Mayor had been considering a similar approach. She noted that if Brexit was not carried out in a way that would allow skills transition, the economy of Brent would suffer – approximately half of the 40, 000 EU nationals living the area

worked in the Borough, filling roles in various sectors, ranging from construction to healthcare. A Member of the Committee noted that the negative effect could have an impact on Brent prior to the official leaving of the EU and gave an example with the Polish community and the number of people moving back to Poland as a result of the improved economy of their native country.

The Committee agreed that the situation would be monitored and action would be taken in line with the Borough's interests if necessary.

**RESOLVED that:**

- (i) The contents of the European Union Referendum Implications for Brent report, be noted;
- (ii) A briefing session for all Elected Members be organised; and
- (iii) An update on the issue be provided to a future meeting of the Committee.

**8. Progress report on the Council's work with Eastern European communities**

Pascoe Sawyers (the Council's Head of Strategy and Partnerships) introduced the paper which provided a progress update and outlined the next steps on the Council's outreach work with local Eastern European communities. The Committee heard that three out of the five recommendations endorsed by the Committee had been completed, with one ongoing and one due to be completed in the autumn of 2017 (page 16 to the Agenda pack).

Mr Sawyers highlighted the key outcomes of the project to date:

- The network of organisations working with Eastern Europeans had grown from 15 to 28 members
- The Eastern European Fair had been very successful with approximately 600 guests attending, among whom Mr Barry Gardiner Member of Parliament, the Mayor of Brent and the Leader of Brent as well as Councillors Davidson and McLennan who co-hosted the event.
- In partnership with Advice4Renters, a leaflet providing tailored information and advice had been translated into the main Eastern European languages

The Committee heard that work on the recommendation on providing training and capacity building was ongoing. What remained outstanding was to deliver drop-in sessions in various locations across the Borough in the autumn of 2017. In terms of next steps, the Committee heard that Brent would be submitting a bid for available funding through the Department of Communities and Local Government (DCLG) and would be exploring opportunities for joint working with other Local Authorities and third parties.

Members of the Committee enquired about the cohesion among various Eastern European communities. In response, Andreyana Ivanova (the Council's Head of Equality) said that the Equalities Team interaction with Eastern European communities and feedback from Eastern European organisations supporting the team showed there was willingness of communities to mix and the Eastern European Fair and other engagement activities were a clear demonstration and celebration of community cohesion. She noted, however, that there was more work



to be done with groups such as the Gypsy and Roma communities who have distinct needs and challenges that could not be addressed via the mainstream approach. This work was due to commence shortly as part of the next phase of the project, in partnership with the Eastern European network.

**RESOLVED that:**

- (i) The contents of the progress report on the Council's work with East European communities, be noted;
- (ii) The Committee's appreciation for the good work completed be noted; and
- (iii) An update on the next stage of the project be provided to a future meeting of the Committee.

**9. Progress update on actions taken to address employees' feedback from Your Voice survey (presentation delivered on the day)**

Mildred Phillips (the Council's Head of Employee Services) delivered a presentation on the actions taken to address employees' feedback as per the Committee's request. She provided background information to the survey which had been conducted in the period March-April 2016. She said that, overall, 70% of respondents were satisfied with the job they did, but expressed concern that the percentage of people who believed action would be taken to address the outcomes of the survey was low (37%). She continued by focusing on the top and the bottom five responses. The issues identified were that employees did not feel that there had been a strong culture of performance management; change was managed effectively; and the Council Management Team (CMT) was open and honest in their communication with staff. Carolyn Downs (the Council's Chief Executive) said that her biggest concern was that employees did not consider managers to be open and transparent.

Ms Phillips highlighted the actions taken to increase the visibility of senior managers. Forward Together sessions with CMT were being held and were very well received by employees, with over 50% of the workforce attending the last round of sessions. Minutes of CMT meetings were published on the Intranet and employees were regularly shadowing these. The Chief Executive held bi-monthly breakfast/lunch meetings and attended team meetings. The staff and managers' newsletter had been re-launched and the usage of Yammer had increased significantly. In addition, the 'Love Where You Live' campaign had been launched. The Chair commented that politicians, especially the Cabinet, had to be active and visible and gave an example of the Question Time sessions with the Leader and herself where in-depth discussions on important matters were taking place.

In terms of performance management, the appraisal scheme had been simplified and guidance for managers had been issued, along with support how to handle complex situations. The Council had reviewed the corporate training offer which led to the introduction of the My Development portal. A Member of the Committee asked if Brent had mental health champions and Ms Phillips explained that this had been considered and it would be introduced, with the Occupational Health Adviser being available to provide support until the changes were introduced.

The Committee discussed when the next staff survey would be taking place and it was suggested that this could be in April 2018. In response to a question about the gender pay gap (GPG), Andreyana Ivanova (the Council's Head of Equality) said that the 2015-16 GPG was 6.8% which was relatively low compared to the average public sector GPG of 11%. She reminded the Committee that GPG reporting was now mandatory and noted that it would receive a report on the 2016-2017 GPG at a future meeting.

**RESOLVED that** the progress update on actions taken to address employees' feedback from Your Voice survey, be noted.

**10. Update on Management Development 2016/17**

Mildred Phillips (the Council's Head of Employee Services) introduced the report which gave an overview of management development during 2016 and 2017. She said that two key programmes had been implemented during this period- 'Aspire' and 'Inspire', with the former one being linked to two levels of Chartered Management Institute (CMI) qualifications – Level 3 for employees at grades PO1 to PO4 and Level 5 for staff at grades PO5 to PO8. Ms Phillips drew the Committee's attention to paragraph 5.5 of the report (page 32 to the Agenda pack), which provided details about the career progression of participants. She noted that 70% of those promoted following the completion of the Level 3 Certificate (10) were from black, Asian and minority ethnic (BAME) background. In relation to the 'Inspire' programme, Ms Phillips said that Module 1 had been completed, feedback so far had been positive and more details would be provided at a future meeting of the Committee.

The Committee discussed the outcomes of the 'Aspire' programme and Althea Loderick (the Council's Strategic Director for Resources) noted that the proportion of BAME staff at senior levels within the organisation was continuously increasing from 11% in 2015 to 28% in 2017, which was a significant achievement in such short period of time.

**RESOLVED that** the Update on Management Development 2016/2017, be noted.

**11. Progress update on Brent's 2017/18 Equality and Diversity action plan**

Andreyana Ivanova (the Council's Head of Equality) drew the Committee's attention to Brent's 2017/2018 Equality and Diversity Action Plan (pages 39-41 to the Agenda Pack) and highlighted that the only action with an amber status was the streamlining and re-launching of the Council's Equality Analysis (EA) process. She explained that there had been a slight delay and the action was expected to be completed in Autumn 2017. A new more user-friendly template was being drafted and it would be piloted with staff members in due course, with the Equalities Team arranging drop-in and team sessions to promote it.

Ms Ivanova informed the Committee that she had managed to submit an application for the Best 100 Employers for Race 2017. Feedback received had been positive and the final result would be known in November 2017. As far as the Stonewall Workplace Equality Index (WEI) annual application was concerned, Ms Ivanova confirmed its submission and expressed her confidence that Brent had chances to

improve its position in the overall ranking (ranked 200th in 2017), although this also depended on the number of employers participating in 2018 Stonewall WEI.

Members of the Committee enquired about future actions. Ms Ivanova said that the Equalities Team had been working with services and forums to identify key equality and diversity matters to taken forward but reminded the Committee that there were a few actions in green (i.e. on track) that were still due to be completed. She invited Members to share their ideas about relevant areas to be included in the 2018/19 Action Plan. In response, a Member suggested that leaving the European Union and the impact on Brent residents had to be added.

**RESOLVED** that the progress update on Brent's 2017/2018 Equality and Diversity Action Plan, be noted.


12. **Any other urgent business**

There was no other urgent business.

The meeting closed at 7.51 pm

COUNCILLOR MARGARET MCLENNAN  
Chair

**This page is intentionally left blank**

	<p align="center"><b>Equalities Committee</b> 19 February 2018</p>
	<p align="center"><b>Report from the Director of Performance, Policy and Partnerships</b></p>
<p><b>A Review of the Accessibility of Council Services for Disabled Residents</b></p>	

<b>Wards Affected:</b>	ALL
<b>Key or Non-Key Decision:</b>	N/A
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>No. of Appendices:</b>	One: • Evidence Collected from Departments
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Adina Maglan Equality Officer Email: <a href="mailto:adina.maglan@brent.gov.uk">adina.maglan@brent.gov.uk</a> Tel: 020 8937 3153

## 1.0 Purpose of the Report

- 1.1 The purpose of this report is to present the findings of a review commissioned by the previous Equalities team on the accessibility of frontline Council services.

## 2.0 Recommendation(s)

- 2.1 That the Equalities Committee notes the contents of this review, and agrees that a survey of residents and users with disabilities is undertaken to understand their experience of frontline services.

## 3.0 Detail

- 3.1 In 2016, the Committee considered an item on the accessibility of the Civic Centre for people with disabilities, as well as another on online accessibility of services. Following on from this, the 2017/18 Equality Action Plan included an action to establish a cross-council Task and Finish working group to map out and assess the accessibility of Council services for customers with disabilities, and work in partnership with relevant local community organisations to agree recommendations to address identified inconsistencies and gaps.

- 3.2 The first part of this work was undertaken by the previous Equalities team, and an officer was recruited on a temporary basis to carry out a review to ascertain the levels of accessibility of Council services. This was done through meeting and corresponding with officers and managers. The evidence gathered is set out in Appendix 1, along with observations from the services in question and possible activity which could be undertaken to improve accessibility.
- 3.3 There were few or no substantive issues identified for areas in the Environmental Services Directorate, Planning & Building Control, Housing, and Adults Social Care. The Children and Young People's Department may wish to consider engagement and communication with community groups, and in a range of languages, to raise awareness of its services for children with disabilities, as well as continuing to review the Local Offer website to make sure that services are easy to find and understand.
- 3.4 The Employment and Skills service is advised to provide more classes inclusive of learners with disabilities, as well as to ensure staff and tutors are regularly undertaking disability awareness training. In Customer Services, the review also identified the need to ensure up-to-date disability awareness training, as well as to ensure that the impacts of changes to the benefits system are communicated to people with disabilities in a timely fashion and the full implications for them are understood. It also made recommendations around braille and British Sign Language communication.
- 3.5 For Public Health and Cultural Services, there is a wide range of options to make libraries and sports centres and provision more accessible to people with disabilities, from investing in assistive equipment to closer consultation and engagement with disabled users, training and qualifications for staff. However, it is recognised that implementing some of these would have resource implications for these services.
- 3.6 The review has also made a number of overarching potential recommendations which might further improve engagement with disabled residents. These include:
- Ensuring a joined-up approach between departments and sharing information so there is awareness of the needs of disabled residents (whilst ensuring data protection rules are followed). In particular, Adult Social Care will have detailed knowledge on residents who have extra support needs, which could be useful for other teams in tailoring their services, and would avoid residents having to disclose repeatedly.
  - Surveying disabled residents accessing different services to ascertain their levels of satisfaction and provide customer feedback. This information could help improve services.
  - Developing and maintaining a resource which provides information on the accessible services available for disabled residents (though this would have a cost implication, including ensuring it is kept up to date).
  - Ensuring ongoing training for all staff to ensure there is a good understanding of equality and diversity including understanding the legal responsibility to make reasonable adjustments for disabled residents and customers.

3.7 It should be recognised that the findings of this review are preliminary, and the decisions around implementing improvement activities will be subject to further detailed analysis and consultation with the relevant services. However, the first step will be undertaking a survey of disabled residents and service users, and plans for this are set out below.

### BSL Charter

3.8 The Council is also considering signing up to the BSL Charter, as per the 2017/18 Equalities Action Plan. In order to be eligible it must commit to at least three of the below five pledges and evidence its commitment via a self-assessment process, in partnership with the local deaf community. It must also demonstrate its commitment to improve on the remaining pledges. The five key pledges to improve access and rights for deaf people who use sign language are:

- Consult formally and informally with the local Deaf community on a regular basis
- Ensure access for Deaf people to information and services
- Support Deaf children and families
- Ensure staff working with Deaf people can communicate effectively using British Sign Language
- Promote learning and high quality teaching of British Sign Language.

3.9 While the cost of signing the pledge is small a, there would be resource implications, including but not limited to:

- the self-assessment and evidence gathering process, which would require the establishment of a cross-council working group and engagement with external stakeholders (including a mystery shopping exercises to identify any gaps);
- arrangements to address the identified gaps and areas of improvement;
- communication with and training of employees (e.g. Deaf Awareness, Basic BSL interpreting, etc), particularly frontline staff to ensure a consistent approach is applied across the council; and
- regular review of progress against each of the pledges and ongoing engagement with the deaf community in Brent and celebration of achievements.

3.10 Some evidence has been gathered in the course of this review regarding provision for deaf residents, and the gaps and areas of improvement (as per the second point above). However, it is again very preliminary and insufficient at this stage to determine clearly whether or not signing up to the Charter is feasible or desirable. Further work would be needed to do so, and this is reflected in the update on the Equalities Action Plan.

## Next Steps

- 3.11 The next stage will involve a survey of people with disabilities to gauge their views and experiences of the accessibility of council services. This will be carried out online for a period of four weeks, scheduled at the time of writing to launch on 15 February 2018. The consultation will be publicised via relevant Council channels, and brought to the attention of service-users through our partners at CVS Brent, Volunteering Brent, and through the Disability Forum.
- 3.11 In addition, other recent surveys of users with disabilities will be drawn upon, including those carried out by the council's Facilities, Customer Services and Communications teams. Following review of these findings, relevant actions will be incorporated into the 2018/19 Equalities Action Plan.

### **4.0 Financial Implications**

- 4.1 There are no financial implications of this review itself. Financial implications of particular actions will be considered when these are being recommended for implementation.

### **5.0 Legal Implications**

- 5.1 The Equality Act 2010 places specific duties on public sector bodies to eliminate unlawful discrimination and harassment, advance equality of opportunity and increase community cohesion. This review seeks to ensure that the Council is undertaking the first two parts of this by ensuring equitable access to services for disabled people and putting in place reasonable adjustments which is a legal requirement.

### **6.0 Equality Implications**

- 6.1 This review was undertaken in line with the Public Sector Equality Duty as set out in the Equality Act 2010. In particular, this review seeks to ensure that the provision of Council services does not lead to unlawful discrimination against disabled residents. This would be the case if they are unable to access any Council services. The review also seeks to advance equality of opportunity for disabled residents by looking at what departments can specifically do to remove the barriers disabled people may experience in accessing employment and other services.

### **7.0 Consultation with Ward Members and Stakeholders**

- 7.1 The report includes the findings following a desktop audit only and feedback from our front line teams.
- 7.2 In the next stage, the Council will engage with service users via a four-week consultation that will be launched on 15 February 2018.



**8.0 Human Resources/Property Implications (if appropriate)**

8.1 There are no staffing or accommodation implications of this review itself. Financial implications of particular actions will be considered when these are being recommended for implementation.

**Report sign off:**

**PETER GADSDON**

Director of Performance, Policy and Partnerships.

**This page is intentionally left blank**

Services	Lead contact	Potential barriers for disabled people	Current provision in place	Service feedback and possible improvement activity
<b>CHILDREN &amp; YOUNG PEOPLE'S DEPARTMENT</b>				
All department	Nigel Chapman Brian Grady	<ul style="list-style-type: none"> <li>- Special educational needs</li> <li>- Building access if student has physical conditions</li> <li>- Needs of children with autism</li> <li>- Insufficient information on services available</li> <li>- People with disabilities unable to access the webpage</li> <li>- Webpage layout and design</li> </ul>	<ul style="list-style-type: none"> <li>- Family focused support</li> <li>- Early support for disabled children under 5 or who have additional needs</li> <li>- Portage – a free home visiting service for pre-school children with a disability or additional needs from birth to four years old.</li> <li>- Family Solutions Service - confidential advice and support for families with children aged 0 to 18 (up to 19 for young people with disabilities)</li> <li>- Children's centres - where you can access a range of services including speech and language therapy and SEND parent support groups</li> <li>- Parenting courses</li> <li>- Childcare: <ul style="list-style-type: none"> <li>o Nurseries that offer specialist places for children with SEND</li> <li>o Childminders who have experience of looking after youngsters with additional needs</li> <li>o Out-of-school and holiday clubs</li> <li>o Brent's Children and Families Information Service (CFIS), which holds details of all registered providers in the borough.</li> </ul> </li> <li>- Two year olds may be able to get free early education if family is low income, in receipt of benefits or child has a disability or additional needs.</li> </ul> <p>Brent's Local Offer webpage - a single point of information and advice for children and young people from 0 to 25 with special educational needs and disabilities (SEND) and their families with information on services, advice and other useful information. This was developed in partnership with parents, carers, young people and schools.</p> <p>Comments and requests to join the Local Offer submitted online and new provisions are implemented to cover any identified gaps.</p>	<ul style="list-style-type: none"> <li>- Targeted communication in different community languages to raise awareness amongst new communities</li> <li>- Engagement with community groups for information campaigns and signposting</li> <li>- Continue to review the Local Offer site to make sure that services are easy to find and understand.</li> </ul>
<b>REGENERATION &amp; ENVIRONMENT</b>				
Parking & Lighting	Gavin Moore	<ul style="list-style-type: none"> <li>- Parking close to home / workplace / shops /leisure activity</li> </ul>	<ul style="list-style-type: none"> <li>- Blue badge parking</li> <li>- A disabled person's parking place (DPPP) is a parking space marked on the public highway by a white painted box with a sign indicating that it is for the use of blue badge holders only. provision of a disabled bay (DB) in residential streets is considered on a needs basis and subject to the completion of an application</li> <li>- The Personalised Disabled Person's Parking Places scheme is an initiative designed to assist vulnerable Brent disabled residents experiencing problems using their existing Disabled Person's Parking Places.</li> </ul>	<ul style="list-style-type: none"> <li>- Few complaints in relation to disabled parking provision.</li> </ul>
Transportation	Tony Kennedy	<ul style="list-style-type: none"> <li>- Inaccessible public transport</li> <li>- Infrequent transport</li> <li>- Expensive transport</li> <li>- Transport is not close enough to workplaces/home/leisure and social activities</li> </ul>	<ul style="list-style-type: none"> <li>- Older person's and disabled person's freedom passes (forms from libraries)</li> <li>- Taxi cards scheme allows Brent residents with a mobility impairment that prevents them from using public transport to travel in taxi cabs at a subsidised rates.</li> <li>- "Please offer me a seat" badge</li> <li>- Come on board – help for disabled and older passengers to access London's public transport network.</li> </ul>	<ul style="list-style-type: none"> <li>- 'Travel support for those with needs' webpage to be kept up-to-date</li> </ul>

Services	Lead contact	Potential barriers for disabled people	Current provision in place	Service feedback and possible improvement activity
Environmental Services (other)	Chris Whyte	<ul style="list-style-type: none"> <li>- Insufficient support for people with hidden disabilities</li> <li>- Disability awareness of staff not sufficient</li> </ul>	<p>Public Realm:</p> <ul style="list-style-type: none"> <li>- Adjustments are made to collection points for people with mobility issues</li> <li>- For people with dementia or a mental health condition which makes it difficult to separate waste and recycling, one bin can be used.</li> </ul> <p>Community Protection:</p> <ul style="list-style-type: none"> <li>- adjustments to control orders where the person is disabled</li> <li>- Disability awareness is part of contracts for commissioned services.</li> </ul> <p>Brent Transport Services:</p> <ul style="list-style-type: none"> <li>- Specialist transport service for people who have significant disabilities</li> <li>- Drivers and escorts receive diversity training, and escorts trained in supporting residents' conditions, including administering medicines.</li> </ul>	
Planning and Building Control	Alice Lester	<ul style="list-style-type: none"> <li>- People with disabilities unable to access the service</li> </ul>	<p>Customers can:</p> <ul style="list-style-type: none"> <li>- Speak by phone to a Duty Planning Officer (referred by Customer Services if they cannot assist)</li> <li>- Submit planning applications electronically or in hard copy)</li> </ul> <p>Details on all planning applications are published on our website.</p> <p>Translation and Interpreting services can be accessed by all staff members; information available on intranet.</p> <p>All new planning policies or Supplementary Planning Documents (SPDs) screened using the Equality Analysis tool when published for public consultation. May be part of wider Integrated Impact Assessment which other impacts, to satisfy legislative requirements.</p> <p>Statement of Community Involvement sets out how the Council will engage those with protected characteristics, including disability.</p> <p>Our Development Management Policies set out accessibility as "a fundamental component" of a development's success, whatever individuals' characteristics. Policy DMP12 Parking and Appendix 1 Parking Standards include standards for parking for disabled people.</p> <p>Recent Local Plan engagement included Disability Rights and Politics (DRAP) Brent.</p> <p>In contact with customers, approach varies depending on needs of customers, but includes measures such as the use of plain English for consultation documents and reports, and provision of additional information to those who require this to be able to understand proposals or to submit applications to the Council.</p> <p>Building Regulations applications assessed for compliance with 'Access to and Use of Buildings' standards.</p> <p>No Equality Analysis assessments undertaken.</p>	


Services	Lead contact	Potential barriers for disabled people	Current provision in place	Service feedback and possible improvement activity
Employment & Skills	Matthew Dibben	<ul style="list-style-type: none"> <li>- Insufficient support for disabled people looking for work /out of work</li> <li>- Insufficient reasonable adjustments in the workplace</li> </ul>	<p>All Brent Start provision is accessible to disabled learners, and there is dedicated provision for learners with disabilities.</p> <p>At enrolment the services collect data on disabilities and chronic conditions for every applicant.</p>	<ul style="list-style-type: none"> <li>- More classes inclusive of learners with disabilities to be provided</li> <li>- Disability awareness training to be completed by staff and tutors on a regular basis</li> </ul>
<b>RESOURCES</b>				
Customer Services	Collette Hamilton	<ul style="list-style-type: none"> <li>- All services, either online or face to face must be accessible</li> </ul>	<ul style="list-style-type: none"> <li>- Specific training for customer service staff on working with disabled people</li> <li>- Online BSL video on current provision in place</li> <li>- Self-service kiosk desk, are adjustable for wheelchair users</li> <li>- 2 self-service kiosks have keyboards for partially sighted customers.</li> </ul>	<ul style="list-style-type: none"> <li>- Consider provision for providing notifications in braille for blind residents</li> <li>- Ensure that staff disability awareness and refresher professional training is up to date</li> <li>- Information for staff on how to access BSL interpreting services</li> <li>- Explain changes to benefits system to disabled people in a timely fashion</li> <li>- Joined-up approach with other council services when changes to benefits impact a person's housing or other service.</li> </ul>
<b>COMMUNITY WELLBEING</b>				
Housing	Laurence Coaker Fidery Lavrine	<ul style="list-style-type: none"> <li>- Housing is inaccessible</li> <li>- Housing is not easily adaptable</li> <li>- Accessible housing is away from a person's family, work or social life and may therefore isolate.</li> </ul>	<ul style="list-style-type: none"> <li>- Council has a list of ways to adapt homes including suggested equipment, retailers and personal online assessment tool. Council can help where eligibility criteria met.</li> <li>- Information available on telecare includes: <ul style="list-style-type: none"> <li>o pendant alarms</li> <li>o community alarms (e.g. pull-cord alarms to call for help or alert a call centre automatically)</li> <li>o home sensors (e.g. gas sensors).</li> </ul> </li> <li>- Disabled facilities grant also available.</li> </ul>	
Public Health and Cultural Services	Melanie Smith	<ul style="list-style-type: none"> <li>- Accessibility of libraries and leisure activities</li> <li>- Insufficient green spaces within easy reach of disabled people</li> <li>- Public Health services are accessible to people with disabilities</li> </ul>	<p>Core library service is accessible, including:</p> <ul style="list-style-type: none"> <li>- flat access or lifts</li> <li>- hearing loop</li> <li>- stock, text and interactives at accessible heights for wheelchair users</li> <li>- public toilets disabled accessible</li> <li>- large print keyboard and ball mouse on PC's.</li> <li>- stock in large print and spoken word.</li> <li>- all text produced using colours for people with visual impairment in mind.</li> <li>- activities accessible to all including chair based exercises, story time for special educational needs.</li> </ul> <p>Home Library Service for customers who struggle to reach the library with monthly deliveries of stock by volunteers. Also outreach</p>	<ul style="list-style-type: none"> <li>- Invest in more assistive equipment and deliver more programming for disabled library users e.g. reading aloud groups for health (would require significant additional resources)</li> <li>- Closer working between libraries, Public Health and GP networks to increase social prescribing referrals</li> <li>- Consultation with disabled groups/individuals to identify further barriers, particularly on exhibitions</li> </ul>

Services	Lead contact	Potential barriers for disabled people	Current provision in place	Service feedback and possible improvement activity
			<p>collections in community locations such as care homes and hospital wards.</p> <p>Specialist stock to help users with long term conditions including mental health conditions and dementia.</p> <p>24-hour e-library service with variations for reading including larger fonts, audio text, dyslexia display etc.</p> <p>BookStart free book scheme for babies and toddlers supported with specialist packs for children who are deaf, visually impaired, and with conditions affecting fine motor skills.</p> <p>National campaigns supported with stalls run by community groups, community information folders in libraries, displays and appropriate stock available to support a range of conditions.</p> <p>All library staff to receive relevant Making Every Contact Count training – currently in early stages of roll out.</p> <p>Vale Farm sports centre Inclusive Fitness Initiative (IFI) accredited; Bridge Park and Willesden centres have IFI equipment. A proportion of equipment is DDA/IFI compliant.</p> <p>Gym staff trained to work with people with disabilities.</p> <p>Group classes open to disabled customers, as well as dedicated multi-sports sessions and swimming for adults &amp; children</p> <p>B.Active card discount for people with disabilities to access free swimming and up to 40% off many other activities</p> <p>Sportsability for Children – rebound therapy trampoline sessions available</p> <p>Each centre has a Sports Development Outreach officer, through whom disability sports is promoted, as well as through communications channels.</p> <p>Deaf clients are seen by Smoking Cessation Services with a BSL interpreter booked via their medical practice.</p> <p>Blind clients seen by Smoking Cessation Services may come with a friend /partner to help guide them.</p> <p>Where clients cannot attend face to face sessions due to illness or disability, telephone support is offered over the same period of time as the face to face sessions.</p>	<ul style="list-style-type: none"> <li>- Library staff to attend disability user group or equivalent on more regular basis to consult on accessibility.</li> <li>- Continue rollout of MECC training</li> <li>- Continue with plan to train staff to raise awareness and ensure simple solutions implemented to make libraries dementia friendly.</li> <li>- Disabled change facility in libraries to meet industry standard.</li> <li>- Gym equipment is limited due to space and resources.</li> <li>- If the resources were available more targeted classes. Need for more specialist coaches.</li> <li>- Disabled residents may be unable to attend sports sessions due to long commutes to centres.</li> <li>- Include information on local offer from independent community groups/projects</li> </ul>

Services	Lead contact	Potential barriers for disabled people	Current provision in place	Service feedback and possible improvement activity
			<p>Easy-to-understand pictorial presentations available.</p> <p>All abilities welcome to physical activity sessions. Level of activity is appropriate for ability/condition etc. Walks and outdoor gyms are accessible to all.</p>	
Adult social care		<ul style="list-style-type: none"> <li>- Insufficient support for people with different mental and physical health conditions to get an assessment</li> <li>- Insufficient support for disabled people with caring responsibilities</li> <li>- Is independent advocacy support provided where relevant to assessment?</li> </ul>	<ul style="list-style-type: none"> <li>- Assessment based on need and ability to carry out basic tasks</li> <li>- Carers are involved when assessment is undertaken</li> </ul>	

**This page is intentionally left blank**



 <b>Brent</b>	<b>Equalities Committee</b> 7 February 2018
<b>Report from the Strategic Director of Resources</b>	
<b>Impact and Equality Analysis of the Overall Benefit Cap</b>	

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Non-Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>No. of Appendices:</b>	Three: <ul style="list-style-type: none"> <li>• Welfare benefits included in the Benefit Cap and exemptions</li> <li>• Overall Benefit Cap (OBC) Analysis</li> <li>• Detailed Ethnicity Breakdown</li> </ul>
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	David Oates Head of Customer Service and Benefits Email: <a href="mailto:David.Oates@Brent.gov.uk">David.Oates@Brent.gov.uk</a> Tel: 0208 937 1931

## 1.0 Purpose of the Report

1.1 In February 2017, officers reported on the expected impacts of the government's reduced welfare benefits cap, based on data provided by the DWP of the Housing Benefit claimants expected to be affected by the new limit. This report provides details of the **actual** impacts on residents of the reduced cap, and briefly outlines the steps taken to offer support and services to residents affected.

## 2.0 Recommendation

2.1 The Committee is asked to note the contents of the report, and the impacts on specific claimant cohorts within the Borough.

## 3.0 Detail

3.1 The Overall Benefit Cap (OBC) was first introduced nationally in 2013 and in Brent during August 2013 and refers to the maximum amount of specified Government welfare benefits that can be received by a household on a weekly basis unless they are exempt. It originally equated to £500 per week for working age couples and single parents and £350 per week for single persons. Where

a household received more in weekly benefits than the current cap permits, their Housing Benefit (HB) was reduced by the excess.

- 3.2 Since 7 November 2016 these limits had been reduced to £442.31 per week for working age couples and single parents and £296.35 per week for single persons resident in the London area. Unlike previously, there is now a separate, lower Benefit Cap limit for residents of properties outside of the London area.
- 3.3 Residents already subject to the benefit cap immediately prior to 7 November 2016, experienced a further reduction in their Housing Benefit entitlement from that date. Residents who were subject to the benefit cap for the first time due to the reduced limits, experienced a reduction in their Housing Benefit entitlement in the weeks following 23 January 2017.
- 3.4 Details of the welfare benefits which are included in the cap, and those which provide exemptions from it, are provided in Appendix A. Primarily, exemptions relate to claimants who are in receipt of certain disability benefits, and thus a large number of disabled people completely avoid the impact of the cap. Those claimants with less severe disabilities (ie receiving Employment & Support Allowance (unless this includes the care component)) are still subject to the cap, and the impact on this group is shown in paragraph 4.10 below.
- 3.5 The original cap in 2013 affected 1320 households in Brent, predominantly single parents. Through a combination of factors, including extensive mitigation activities carried out by various Council departments and partner organisations; the incentivising or penalising policy intention of the cap; and – arguably – a generally improving economic situation, the number of capped household in Brent had reduced to 631 affected by the existing cap immediately prior to 7 November 2016.
- 3.6 It should also be noted that the cap also applies to claimants of Universal Credit, of whom there are approximately 2,200 in Brent. Full details of these households is not available to the Council, although it is understood that approximately 60 of these households are capped.
- 3.7 It will also be appreciated that many households impacted by the Cap may also be affected by other welfare reforms including restrictions to Local Housing Allowance rates in private sector housing, the Bedroom Tax in the social sector, the local Council Tax Support scheme and the general four-year freeze in benefit allowances and premiums introduced from 2016.

#### **4.0 Financial Implications**

- 4.1 At the time of the previous report, in February 2017, not all of the expected instructions to cap claimants from 23 January 2017 had been received from DWP, and that report therefore was based on a file of predicted capped cases provided by the DWP in September 2016 for pro-active mitigation purposes. This file identified 1875 cases potentially liable for the cap, three times the 631 still impacted by the original cap immediately prior to 7 November 2016.
- 4.2 The new, lower cap was introduced over a number of weeks from 23 January 2017, and by the end of February 2017, a total of 1290 cases were capped, which was significantly less than originally predicted but still double the previous capped caseload. In almost all cases, however, when broken down into amount

of cap, household or tenure type, age, ethnicity, etc., the relative proportion of the capped caseload falling into each category mirrored the proportions in the advance data file. Comparisons of the predictive and actual data (as at January 2018) are provided in more detail in Appendix B, which also contains details of cap levels, length of cap and ward-level analysis.

- 4.3 Over the ensuing 10 months the capped caseload rose to a maximum of 1340 cases in June but had decreased to 1168 by December. On average 99 new cases are capped each month with 109 cases becoming uncapped.
- 4.4 Despite the regular movement on and off the cap indicated above, a large number of claimants remain capped for significant periods. For example, 44% of claimants capped in January 2017 remained in receipt of capped HB for the whole of 2017. (See Appendix B, page 4.)
- 4.5 A total of 299 households (26%) are capped by up to £24.99 per week; 405 (36%) by £25.00 to £49.99 per week; and 207 (18%) by £50.00 to £74.99 per week. A complete breakdown by amount of cap is provided in Appendix B, page 6.
- 4.6 Whereas the original cap largely affected lone parents and couples with dependants (85%), the reduced cap affects a far greater proportion of single claimants. (See Table 1)

<b>Type</b>	<b>Number</b>	<b>%</b>	<b>Average Cap</b>
Single People	535	47%	£40.00
Single Parents	439	39%	£61.98
Couple with dependents	152	13%	£70.66
Couple no dependents	3	0%	
<b>Total</b>	<b>1129</b>		

- 4.7 The singles group is less likely to be in priority need if made homeless, presenting a potential risk of increased rough sleeping, sofa surfing or overcrowding if forced to leave their accommodation. However, this group is also the focus of the Council's Single Homeless Prevention project which commenced during 2017, which should help to mitigate some of this impact.
- 4.8 Although there are increases of households capped across all tenancy types, by far the most significant increase is in the private sector, and predominantly affects single claimants, aged over 35. (Single claimants aged under 35 are already restricted within the HB scheme to the cost of a room in a shared house.) (See Tables 2 and 3)

<b>Table 2: Age Range</b>	<b>Number</b>	<b>%</b>	<b>Average Cap</b>
18-24	46	4%	£30.95
25-34	274	24%	£57.62
35-44	343	30%	£57.13
45-54	305	27%	£51.19
55-64	161	14%	£43.60
<b>Total</b>	<b>1129</b>		

<b>Table 3: Tenancy Type</b>	<b>Number</b>	<b>%</b>	<b>Average Cap</b>
Council Tenant (BHP)	23	2%	£41.64
Housing Association	198	18%	£51.10
Private Tenant	830	74%	£48.56
Temporary Accommodation	78	7%	£123.08
<b>Total</b>	<b>1129</b>		

4.9 Table 3 also shows that although the most significantly affected tenancy type is private tenants, a significant minority of Housing Association tenants are also impacted.

4.10 It is also worthwhile considering the types of claimant affected based on their main income type, as demonstrated in the tables 4 and 5 below.

<b>Table 4: Main Income Type ("Passported" benefits)</b>	<b>Number</b>	<b>% of Passported</b>	<b>Average Cap</b>
Income Support	282	32%	£60.79
Job Seekers Allowance	367	42%	£42.21
Employment & Support Allowance	223	26%	£58.37
Total "Passported" Incomes:	872		

<b>Table 5: Income from working</b>		
<b>Main income Type</b>	<b>Number</b>	<b>Average Cap</b>
Earned Income	137	£59.18
Self Employed	31	£55.73

4.11 It is significant that only 42% of capped cases on "passported" benefits are in receipt of Jobseeker's Allowance (ie are actively required to seek work and are arguably the most "job ready" of claimants). 32% are on Income Support, largely single parents, many with children aged under 5, and technically not required to be available for work; the cap, however, makes working near-mandatory if the claimant wishes to remain in their present accommodation.

4.12 It is also significant to note that merely being in work does not in itself enable the claimant to escape the cap; the work must be of sufficient hours to enable them to qualify for Working Tax Credit (16 hours per week for a single claimant

with children; 24 hours for a couple; 30 hours for a single claimant). Table 5 above shows that there are a significant number of working Brent residents who do not meet this threshold and who are, therefore, capped.

- 4.13 Table 6 below shows the ethnicity breakdown of the capped cohort, which broadly mirrors the proportions of the same ethnic groups in the overall HB caseload. The Black group would appear to be more highly represented amongst the capped cohort, but this data should be treated with caution, given the high degree of potential variance due to the claims where ethnic monitoring data has not been provided.

<b>Table 6: Ethnicity</b>	<b>HB caseload</b>	<b>%</b>	<b>Capped cases</b>	<b>%</b>	<b>Average Cap</b>
Asian	4026	12%	113	10%	£60.30
Black	6269	18%	269	24%	£52.15
White	6700	19%	217	19%	£51.80
Mixed	946	3%	51	5%	£44.66
Other	1188	3%	52	5%	£50.68
Not Held	15630	45%	427	38%	£52.56
<b>Total</b>	<b>34579</b>		<b>1129</b>	<b>100%</b>	

## 5.0 Mitigation

- 5.1 The options most likely to be available to a resident affected by the Benefit Cap are as follows:
- Apply for one of the benefits that will [exempt](#) them from the cap (see Appendix A);
  - Make up any shortfall in rent from other money received or negotiate a rent reduction with their landlord;
  - Find somewhere more affordable to live (which may need to be outside Brent);
  - Find work sufficient to qualify for [Working Tax Credit](#);
- 5.2 In most cases the first two options above will not be viable leaving only the latter two options available. However, as seen above, merely finding work may not be sufficient in itself to avoid the cap, and even those in work in the Borough are subject to the high rents and scarcity of affordable accommodation due to the Housing Benefit Local Housing Allowance rates.
- 5.3 A welfare reform mitigation strategy was developed in February 2016 via a coordinated cross-Council approach, and with external partners, to provide a joined-up response in response to the challenge of the reduced cap (and other welfare reforms, notably Universal Credit).
- 5.4 With regard to OBC, the strategy has specifically targeted vulnerable residents for assistance, including those residents in the following cohorts:
- Working With Families
  - Mental health
  - Substance abuse
  - Children with disabilities
  - Children with a child protection plan

- Families in Temporary Accommodation or at risk of statutory homelessness
  - Claimants with learning difficulties or physical disabilities
- 5.5 General and specific advice is available to all claimants via a central information hub (on the Council’s website) and in 2016/17 there was an associated publicity and engagement campaign across various media. An electronic Partner Toolkit is also located on the Council’s website, with a Benefit calculator which provides claimants and caseworkers with a tool for calculating potential entitlement to welfare benefits (including Universal Credit), “better off” calculations and a household budgeting tool.
- 5.6 More specifically, those claimants vulnerable through Mental Health, Troubled Families, and addiction issues etc. and / or likely to present a future statutory demand on the Council are prioritised for more dedicated support. The greatest impacts of the Cap also coincide broadly with the Council’s priority neighbourhoods and officers have targeted support through place-based initiatives such as the Living Room and the Harlesden Hub.

## 6.0 Discretionary spending

- 6.1 The Benefits Service administers two discretionary funds which are for the alleviation of hardship for benefit claimants, not exclusively aimed at those affected by welfare reforms, but heavily utilised by those claimants:
- The **Local Welfare Assistance (LWA) scheme** provides emergency payments to vulnerable residents in crisis situations or for large one-off costs (e.g. white goods).
  - The **Discretionary Housing Payment (DHP)** fund has an annual government grant (which authorities may supplement with their own funds) to assist Benefit claimants (on HB or UC) who are experiencing hardship through housing-related costs. Payments may be one-off (e.g. costs associated with moving to a more affordable property) or ongoing for prescribed periods (e.g. paying the shortfall in rent while the claimant undertakes a job brokerage course).

## 7.0 Implications of further reductions in the OBC

- 7.1 Although there is no indication from central government of there being a further future reduction in the level of the cap, this cannot be ruled out entirely, despite growing evidence of links between welfare reforms and homelessness.
- 7.2 Unfortunately, the impacts of such a reduction are not easily predicted, as these depend partially on the level of the cut, and also on claimant and landlord behaviour. For example, the impacts of the current cap are evident from the data presented in this report, but despite this, and the fact that only 10% of currently capped claimants receive a DHP to cover their rent shortfall, a large number of claimants remain in their property while receiving their capped benefit (the majority capped by more than £25 per week). This suggests that activity is going on beneath the radar, whether this be claimants choosing to pay their rent rather than other household expenses, landlords accepting less than the contractual rent, or even potential fraud.

7.3 A further reduction in the cap level would undoubtedly exacerbate the current impacts, increase evictions and homelessness, and potentially increase the level of “under the radar” activity. It also raises the potential that claimants who have already had to move to cheaper accommodation to avoid the cap, may be required to do so again. Since the introduction of the current cap in November 2016 there has been the added factor that moving outside London is less likely to provide a solution to capped households, given that a (lower) cap is now in force outside the capital.

## **8.0 Legal Implications**

8.1 Covered in the main body of the report.

## **9.0 Equality Implications**

9.1 Covered in the main body of the report.

## **10.0 Consultation with Ward Members and Stakeholders**

10.1 Consultation and liaison with a wide variety of internal and external stakeholders occurs on a bi-monthly basis via the Welfare Reform Partners’ Network Group meetings, particularly focusing on information sharing and co-ordination of mitigation activities. Internally, there is a monthly meeting of all relevant Heads of Service concerning welfare reform activities. The Welfare Reform Strategy went to CMT and PCG in 2016. There has been no specific consultation with Ward members over the implementation of the benefit cap, partly because this is a government initiative, but there are regular (at least annual) member development sessions held on the various aspects of welfare reform.

**Report sign off:**

**ALTHEA LODERICK**  
Strategic Director of Resources

**This page is intentionally left blank**



## Appendix A

### Welfare benefits included in the Benefit Cap and exemptions

#### Benefits included in the Benefit Cap calculation:-

- Housing Benefit;
- Income Support;
- Job Seeker's Allowance;
- Employment and Support Allowance (except where it is paid with the support component);
- Child Benefit;
- Child Tax Credit;
- Maternity Allowance;
- Incapacity Benefit;
- Severe Disablement Allowance;
- Widowed Parent's and Widowed Mother's Allowance;
- Widow's Pension;
- Bereavement Allowance

#### Exemptions

Exemptions from the benefit cap will apply if the Housing Benefit claimant or their partner receive any of the following:

- Attendance allowance
- Disability living allowance
- Personal independence payment
- Employment and support allowance (support component)
- Industrial injuries benefits
- War widow or war widower's pension
- Guardian's Allowance and Carer's Allowance (subject to Government changes to be made later this year).

Additionally, an exemption from the benefit cap will apply if:

- The Housing Benefit claimant qualifies for Working Tax Credit because they work for at least 16 hours per week if they are a single parent, 24 hours per week between them if they are a couple with one of them working at least 16 hours per week or 30 hours if they are a single person.
- They are responsible for a child or young person getting Disability Living Allowance, Personal Independence Payment, or an Armed Forces Injuries Payment

The cap will also not apply for a period of 39 weeks if the claimant or their partner, if appropriate, has ceased paid work that lasted for at least 50 of the 52 weeks immediately prior to their leaving and in the final week, they worked at least 16 hours.

The Benefit Cap applies solely to working age claimants and therefore persons of pension credit age are exempt provided that both members of a couple are of pension credit age.

**This page is intentionally left blank**

# Overall Benefit Cap (OBC) Analysis

Comparative analysis of current OBC data against forecasted impact and current caseload

GIBBS, RUSSELL

## Table of Contents

Capped Claim Movement .....	2
Total Capped Claims & Average Cap: January 2017 to December 2017 .....	2
Length of cap: January 2017 to December 2017 .....	3
General .....	4
Totals: DWP Predicted Cap Data vs January 2018 Cap .....	4
Broad Distribution: DWP Predicted Cap Data vs January 2018 Cap .....	4
Detailed Distribution: DWP Predicted Cap Data vs January 2018 Cap.....	5
General Notes .....	5
Age Analysis .....	6
Age: DWP Predicted Cap Data vs January 2018 Cap .....	6
Age: January 2018 Cap vs Caseload .....	6
Age Summary .....	6
Tenancy Analysis .....	7
Tenancy Type: DWP Predicted Cap Data vs January 2018 Cap .....	7
Tenancy Type: January 2018 Cap vs Caseload .....	7
Tenancy Summary.....	8
Household.....	10
Household Type: DWP Predicted Cap Data vs January 2018 Cap .....	10
Household Type: January 2018 Cap vs Caseload .....	10
Household Summary.....	10
Main Income .....	11
Income: DWP Predicted Cap Data vs January 2018 Cap .....	11
Income: January 2018 Cap vs Caseload .....	11
Tenancy Summary.....	11
Ethnicity .....	13
Ethnicity: DWP Predicted Cap Data vs January 2018 Cap .....	13
Ethnicity: January 2018 Cap vs Caseload .....	13
Ethnicity Summary .....	13
Ward Analysis .....	14
Ward: DWP Predicted Cap Data vs January 2018 Cap .....	14
Ward: January 2018 Cap vs Caseload .....	15
Ward Summary .....	15

# Capped Claim Movement

This section provides an overview of the monthly capped caseload snapshots between January 2017 and December 2017 and how the number of claims and average weekly cap as varied during that time frame.

## Total Capped Claims & Average Cap: January 2017 to December 2017

Table 1: Capped Caseload & Average Cap Movement

Tenure	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17
<b>Total Capped</b>	1145	1290	1246	1309	1321	1340	1308	1264	1215	1203	1199	1168
<b>Average Cap</b>	£60	£60	£60	£58	£59	£58	£58	£55	£57	£55	£54	£53

Chart 1: Capped Caseload movement

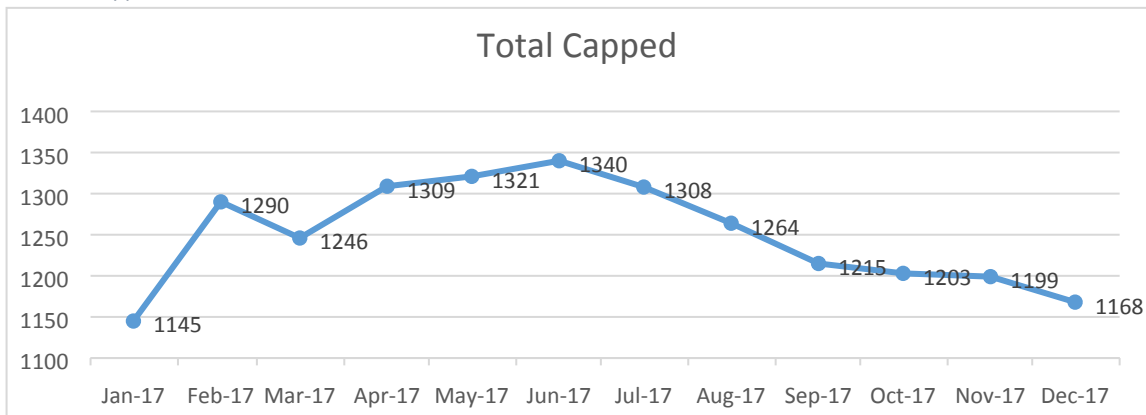
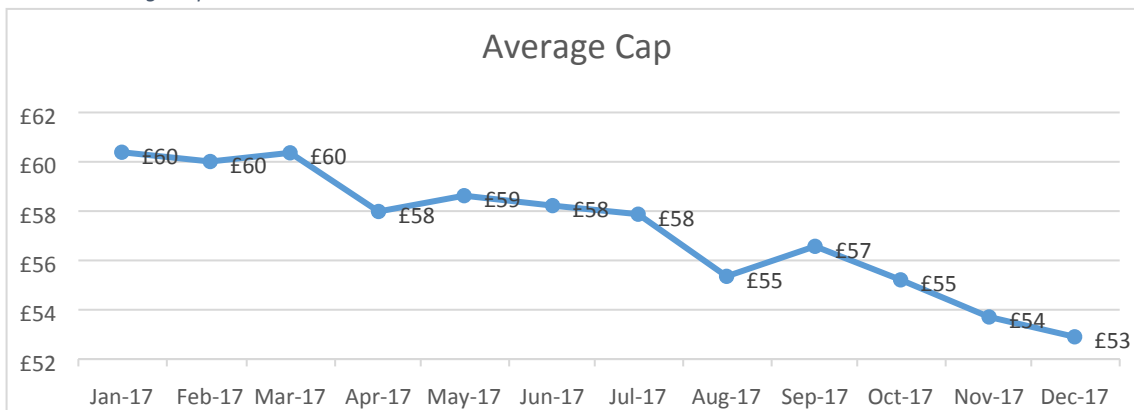


Chart 2: Average cap movement



- Caseload in January 2017 was 1145 but it seemed at the time that not all claims being impacted by the lower cap had come through. This seemed to be confirmed by the fact that in February the capped caseload jumped up by 12% to 1290. By June 2017 the capped caseload had reached 1340.
- Since June 2017 the capped caseload has steadily decreased, reaching 1168 by December 2017.
- The average cap has decreased from £60 to £53 per week between January 2017 and December 2017.

## Length of cap: January 2017 to December 2017

Table 2: Length of Cap

Claims Capped in January 2017					
Total Months Capped (Jan 17 to Dec 17)	No Break in Cap		Break in cap		Total Capped
	Number	% of Total Capped	Number	% of Total Capped	
1	28	2%		0%	28
2	84	7%	2	0%	86
3	51	4%	7	1%	58
4	42	4%	8	1%	50
5	63	6%	12	1%	75
6	40	3%	10	1%	50
7	61	5%	8	1%	69
8	40	3%	11	1%	51
9	31	3%	10	1%	41
10	37	3%	20	2%	57
11	49	4%	26	2%	75
12	505	44%		0%	505
<b>Total</b>	<b>1031</b>	<b>90%</b>	<b>114</b>	<b>10%</b>	<b>1145</b>

- 56% (640) of claims capped at January 2017 ceased being subject to the cap during the 12 months that followed. However 18% (114) of those returned to being capped during that same time frame.
- 44% (505) of claims capped at January 2017 were still capped 12 months later.

## General

This section provides an overview of all capped claims based on a snapshot of the capped caseload in January 2018 along with some comparative analysis against predicted cap data based on DWP information provided in September 2016.

### Totals: DWP Predicted Cap Data vs January 2018 Cap

Table 3: Totals - DWP predicted vs Jan 18 Actuals

General						
Description	DWP Predicted Cap (Sep 17)		January 2018 Actual Data		Difference	
	Capped	Average Cap	Capped	Average Cap	Capped Claims	Cap Amount
Total Claims	1878	£64.89	1129	£52.65	-749	-£12.24

### Broad Distribution: DWP Predicted Cap Data vs January 2018 Cap

Table 4: Broad Distribution - DWP predicted vs Jan 18 Actuals

Broad Cap Distribution					
Range	DWP Predicted Cap (Sep 16)		January 2018 Actual Data		Distribution Difference
	Capped	%	Capped	%	
£0 to £99.99	1565	83%	1017	90%	7%
£100 to £199.99	210	11%	87	8%	-3%
£200 to £299.99	73	4%	20	2%	-2%
£300 to £399.99	19	1%	3	0%	-1%
£400 to £499.99	8	0%	1	0%	0%
£500 to £599.99	3	0%	1	0%	0%

## Detailed Distribution: DWP Predicted Cap Data vs January 2018 Cap

Table 5: Detailed Distribution - DWP predicted vs Jan 18 Actuals

Detailed Cap Distribution					
Range	DWP Predicted Cap (Sep 16)		January 2018 Actual Data		Distribution Difference
	Capped	%	Capped	%	
£0 to £24.99	462	25%	299	26%	2%
£25 to £49.99	580	31%	405	36%	5%
£50 to £74.99	319	17%	207	18%	1%
£75 to £99.99	204	11%	106	9%	-1%
£100 to £124.99	73	4%	31	3%	-1%
£125 to £149.99	75	4%	25	2%	-2%
£150 to £174.99	39	2%	16	1%	-1%
£175 to £199.99	23	1%	15	1%	0%
£200 to £224.99	31	2%	9	1%	-1%
£225 to £249.99	22	1%	6	1%	-1%
£250 to £274.99	14	1%	3	0%	0%
£275 to £299.99	6	0%	2	0%	0%
£300 to £324.99	2	0%	0	0%	0%
£325 to £349.99	10	1%	1	0%	0%
£350 to £374.99	5	0%	1	0%	0%
£375 to £399.99	2	0%	1	0%	0%
£400 to £424.99	3	0%	1	0%	0%
£425 to £449.99	2	0%	0	0%	0%
£450 to £474.99	1	0%	0	0%	0%
£475 to £499.99	2	0%	0	0%	0%
£500 to £524.99	0	0%	0	0%	0%
£525 to £549.99	2	0%	0	0%	0%
£550 to £574.99	1	0%	1	0%	0%

### General Notes

- Actual number of claims capped is almost 40% lower than that which had been anticipated by the initial DWP scan data provided in September 2016, with total predicted claims being 1878 and figure at January 2018 being 1129
- Average actual cap is £12.24 (19%) lower than expected, being £52.65 in January 2018 against a predicted average cap of £64.89.
- The reduction in the overall average cap is borne out in the cap bandings with the number of cases capped between £0 to £100 per week increasing to 90% from the 83% originally predicted.



## Age Analysis

This section provides an overview of claims as broken down by Age bands, based on a snapshot of the caseload in January 2018 along with some comparative analysis against predicted cap data based on DWP information provided in September 2016 and the total HB caseload at January 2018.

### Age: DWP Predicted Cap Data vs January 2018 Cap

Table 6: Age- DWP predicted vs Jan 18 Actuals

Age Breakdown								
Description	DWP Predicted Cap (Sep 17)			January 2018 Actual Data			Difference	
	Capped	%	Average Cap	Capped	%	Average Cap	Distribution	Cap Amount
18-24	96	5%	£52.39	46	4%	£30.95	-1%	-£21.45
25-34	480	26%	£69.00	274	24%	£57.62	-1%	-£11.38
35-44	629	33%	£71.27	343	30%	£57.13	-3%	-£14.14
45-54	474	25%	£60.10	305	27%	£51.19	2%	-£8.91
55-64	194	10%	£48.93	161	14%	£43.60	4%	-£5.33

### Age: January 2018 Cap vs Caseload

Table 7: Age- Jan 18 Caseload vs Capped

Age Breakdown						
Description	January 2018 Caseload		January 2018 Capped Claims			caseload % vs capped % variance
	Number	% of caseload	Capped	% of capped	Average Cap	
18-24	792	2%	46	4%	£30.95	2%
25-34	4874	14%	274	24%	£57.62	10%
35-44	8653	25%	343	30%	£57.13	5%
45-54	8399	24%	305	27%	£51.19	3%
55-64	5295	15%	161	14%	£43.60	-1%

### Age Summary

- Distribution of the cap between the age groups is broadly in line with the DWP's predicted cap data.
- Most affected group still 35-44, accounting for 30% of all capped claims, and the second highest average cap at £57.13
- 18-24 group see the biggest decrease in average cap (£21.45) reducing from £52.39 per week to £30.95, and representing a 41% change.
- 35-44 group see the second biggest decrease to cap at £14.14 (20%)
- Lowest change to cap is the 55-64 age group at only £5.33 per week.

## Tenancy Analysis

This section provides an overview of claims as broken down by broad tenancy type, based on a snapshot of the caseload in January 2018 along with some comparative analysis against predicted cap data based on DWP information provided in September 2016 and the total HB caseload at January 2018.

### Tenancy Type: DWP Predicted Cap Data vs January 2018 Cap

Table 8: Tenancy Type - DWP predicted vs Jan 18 Actuals

Income Type	Broad Tenancy Types							
	DWP Predicted Cap (Sep 17)			January 2018 Actual Data			Difference	
	Capped	%	Average Cap	Capped	%	Average Cap	Distribution	Cap Amount
Council Tenant (BHP)	37	2%	£51.72	23	2%	£41.64	0%	-£10.08
Housing Association	393	21%	£66.04	198	18%	£51.10	-3%	-£14.94
Mixed (TA & Social Care)	25	1%	£144.08	21	2%	£49.56	1%	-£94.52
Private Tenant	1301	69%	£57.67	830	74%	£48.56	4%	-£9.11
Temporary Accommodation (TA)	117	6%	£125.75	57	5%	£123.08	-1%	-£2.67

### Tenancy Type: January 2018 Cap vs Caseload

Table 9: Tenancy Type - Jan 18 Caseload vs Capped

Income Type	Broad Tenancy Types					
	January 2018 Caseload		January 2018 Capped Claims			caseload % vs capped % variance
	Number	% of caseload	Capped	% of capped	Average Cap	
Council Tenant (BHP)	4762	14%	23	2%	£41.64	-12%
Housing Association	11823	34%	198	18%	£51.10	-16%
Mixed (TA & Social Care)	207	1%	21	2%	£49.56	1%
Private Tenant	16668	48%	830	74%	£48.56	26%
Temporary Accommodation (TA)	1208	3%	57	5%	£123.08	2%

Chart 3: HB Caseload Distribution by Tenancy

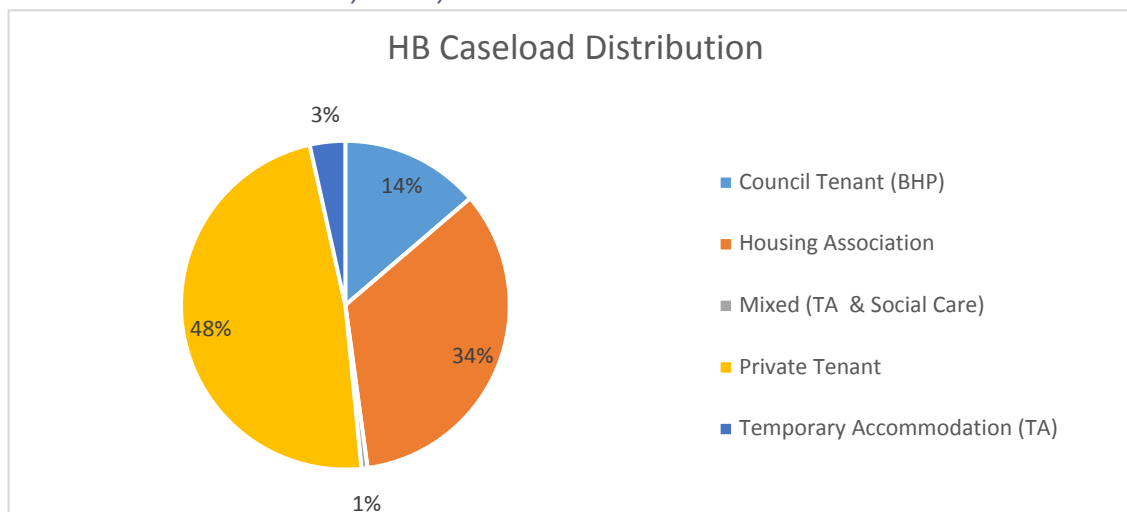


Chart 4: Capped Caseload Distribution by Tenancy

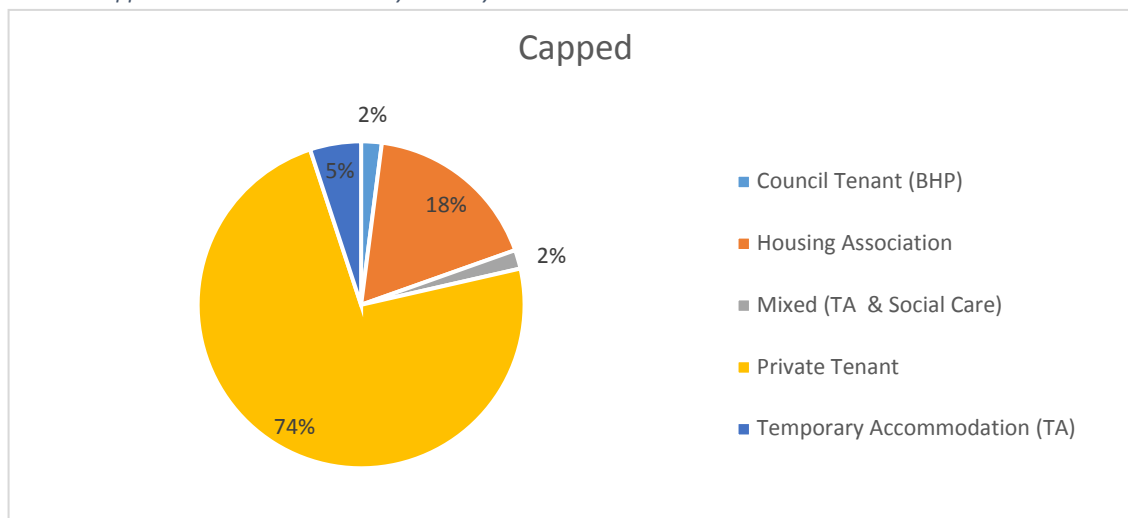


Table 10: Average HB Eligible Rent by Tenancy

Average HB Eligible Rents (January 2018)		
Broad Tenancy Type	Average Eligible Rent (Capped Claims)	Average Eligible Rent (All Claims)
Council Tenant (BHP)	£155.89	£121.77
Housing Association	£242.52	£178.08
Mixed (Temporary Accommodation & Social Care)	£320.34	£345.99
Private Tenant	£293.92	£282.92
Temporary Accommodation	£349.18	£363.92

## Tenancy Summary

- Distribution between tenancy types is largely in line with the predicted cap data from September 2016, with the largest movements being a 4% increase to Private tenants - now representing 74% of all capped claims - and a 3% decrease to Housing Association claims, now making up 18% of all capped claims.
- Tenancy types that have seen the most notable change to the average cap are (see Table 8):
  - Mixed TA & Social care down by 66% (£94.52) from £144.08 to £49.56. NOTE: these only comprise of 21 claims in total (2% of the capped caseload)
  - Housing Association claims have reduced by 23% from £66.04 to £51.10 (£14.94 reduction)
- At 74%, the proportion of claims capped in the private sector is 26% higher than seen in the overall HB caseload where they make up 48% of claims (see Chart 3 & Chart 4)
- Conversely, at 18%, the proportion of housing association claims is 16% lower than seen in the overall HB caseload where they make up 34% of claims. (see Chart 3 & Chart 4)
- The disproportionate number of capped claims in Housing Association and Private tenancies can in part be attributed to the fact that rents are 59% (£104.85) higher in the private sector.
- Additionally, 41% of HB claims for single customers are found in the private sector and 39% in Housing Association properties.
- Taking into account
  - the significant difference in average HB eligible rents

- that the new lower level of cap exposes many more single customers to being affected
- that 80% of single customer are split almost equally between HA's and the Private Sector

It is not unexpected to see that of single customers affected by the cap, 84% are found in the private sector and only 14% in Housing Association tenancies.

## Household

This section provides an overview of claims as broken down by household type, based on a snapshot of the caseload in January 2018 along with some comparative analysis against predicted cap data based on DWP information provided in September 2016 and the total HB caseload at January 2018.

### Household Type: DWP Predicted Cap Data vs January 2018 Cap

Table 11: Household Type - DWP predicted vs Jan 18 Actuals

Household Type Breakdown								
Description	DWP Predicted Cap (Sep 17)			January 2018 Actual Data			Difference	
	Capped	%	Average Cap	Capped	%	Average Cap	Distribution	Cap Amount
Single People	808	43%	£40.17	535	47%	£40.00	4%	-£0.18
Couples	3	0%	£18.90	3	0%	£29.98	0%	£11.08
Single Parents	753	40%	£76.15	439	39%	£61.98	-1%	-£14.17
Families	314	17%	£101.94	152	13%	£70.66	-3%	-£31.28

### Household Type: January 2018 Cap vs Caseload

Table 12: Household Type - Jan 18 Caseload vs Capped

Household Type Breakdown						
Description	January 2018 Caseload		January 2018 Capped Claims			caseload % vs capped % variance
	Number	% of caseload	Capped	% of capped	Average Cap	
Single People	17140	49%	535	47%	£40.00	-2%
Couples	2151	6%	3	0%	£29.98	-6%
Single Parents	8239	24%	439	39%	£61.98	15%
Families	7229	21%	152	13%	£70.66	-7%

### Household Summary

- Broadly in keeping with DWP predicted cap data, though a slightly higher proportion of capped claims being single parents at 47% vs 43% previously
- Conversely slightly less Families proportionately affected at 13% down from 17%
- Families see the biggest variance in their average cap with a decrease of £31.28 (31%), going from £101.94 to £70.66 per week
- Single parents see the next biggest variance with a decrease of £14.17 (19%) per week, going from £76.15 to £61.98.
- Single Parents are the most disproportionately affected group, making up only 24% of the total HB caseload but 39% of all capped claims (therefore negatively impacted)
- The other three groups are less disproportionate when looked at against the proportion of the HB caseload they make up, and for all three groups that variance is positive (i.e. they make up a smaller proportion of capped claims than they do the total caseload).

## Main Income

This section provides an overview of claims as broken down by main income type, based on a snapshot of the caseload in January 2018 along with some comparative analysis against predicted cap data based on DWP information provided in September 2016. No real comparative analysis is made with regard to the total HB caseload at January 2018 given that the nature of the benefit cap is based upon being out of work or working too few hours. It should also be noted that the below tables only represent the main income types which represents around 92% of primary incomes for capped claims.

### Income: DWP Predicted Cap Data vs January 2018 Cap

Table 13: Main Income Type - DWP predicted vs Jan 18 Actuals

Main Income Types								
Income Type	DWP Predicted Cap (Sep 17)			January 2018 Actual Data			Difference	
	Capped	%	Average Cap	Capped	%	Average Cap	Distribution	Cap Amount
Income Support	526	28%	£72.98	282	25%	£60.79	-3%	£-12.19
Job Seekers Allowance	607	32%	£47.20	367	33%	£42.21	0%	£-5.00
Employment Support Allowance	372	20%	£63.99	223	20%	£58.37	0%	£-5.62
Earned Income	229	12%	£86.30	137	12%	£59.18	0%	£-27.12
Self Employed	51	3%	£85.67	31	3%	£55.73	0%	£-29.94

### Income: January 2018 Cap vs Caseload

Table 14: Main Income Type - Jan 18 Caseload vs Capped

Main Income Types						
Income Type	January 2018 Caseload		January 2018 Capped Claims			caseload % vs capped % variance
	Number	% of caseload	Capped	% of capped	Average Cap	
Income Support	1879	5%	282	25%	£60.79	20%
Job Seekers Allowance	1862	5%	367	33%	£42.21	27%
Employment Support Allowance	5756	17%	223	20%	£58.37	3%
Earned Income	12161	35%	137	12%	£59.18	-23%
Self Employed	2994	9%	31	3%	£55.73	-6%

## Tenancy Summary

- No discernible difference between the DWP predicted cap data and January 2018 data in terms of the proportion of capped claims receiving a particular benefit. The only small variance is in those receiving Income Support which sees that reduce from 28% of capped claims to 25%.
- Those in receipt of Income support now have the highest cap at £60.79 per week, though this is £12.19 less than predicted in by the DWP.

- The main notable difference is in the average cap amount which sees the Earned Income and Self Employed groups with the largest reduction in average caps:
  - Earned Income average cap reduced by £27.12 (31%), going from £86.30 to £59.18
  - Self Employed Income average cap reduced by £29.94 (35%), going from £85.67 to £55.73

## Ethnicity

### Ethnicity: DWP Predicted Cap Data vs January 2018 Cap

Table 15: Ethnicity - DWP predicted vs Jan 18 Actuals

Broad Ethnicity Breakdown								
Description	DWP Predicted Cap (Sep 16)			January 2018 Actual Data			Difference	
	Capped	%	Average Cap	Capped	%	Average Cap	Distribution	Cap Amount
Asian	222	12%	£74.10	113	10%	£60.30	-2%	£-13.80
Black	520	28%	£66.36	269	24%	£52.15	-4%	£-14.21
Mixed	86	5%	£75.23	51	5%	£44.66	0%	£-30.57
White	372	20%	£57.03	217	19%	£51.80	-1%	£-5.23
Not Held	595	32%	£62.66	427	38%	£52.56	6%	£-10.10
Other	83	4%	£71.56	52	5%	£50.68	0%	£-20.88

### Ethnicity: January 2018 Cap vs Caseload

Table 16: Ethnicity - Jan 18 Caseload vs Capped

Broad Ethnicity Breakdown						
Description	January 2018 Caseload		January 2018 Capped Claims			caseload % vs capped % variance
	Number	% of caseload	Capped	% of capped	Average Cap	
Asian	4026	12%	113	10%	£60.30	-2%
Black	6269	18%	269	24%	£52.15	6%
Mixed	946	3%	51	5%	£44.66	2%
White	6700	19%	217	19%	£51.80	0%
Not Held	15630	45%	427	38%	£52.56	-7%
Other	1188	3%	52	5%	£50.68	1%

### Ethnicity Summary

- Given that we do not hold ethnicity details for 45% of the HB caseload and 38% of the capped caseload, caution should be applied in any conclusions drawn from looking at distribution and average caps by ethnicity
- In terms of distribution, largely in line with the DWP predicted cap data with the largest variance (outside of the “Not Held” group) to this being that the proportion of the black ethnicity group decreases by 4%; from 28% in the predicted data to 24% at January 2018
- The largest average cap is found in the Asian group at £60.30 per week



## Ward Analysis

This section provides an overview of claims as broken down by ward, based on a snapshot of the caseload in January 2018 along with some comparative analysis against predicted cap data based on DWP information provided in September 2016 and the total HB caseload at January 2018.

### Ward: DWP Predicted Cap Data vs January 2018 Cap

Table 17: Wards - DWP predicted vs Jan 18 Actuals

Ward Breakdown								
Ward	DWP Predicted Cap (Sep 16)			January 2018 Actual Data			Difference	
	Capped	%	Average Cap	Capped	%	Average Cap	Distribution	Cap Amount
Harlesden	274	15%	£64.14	132	12%	£50.85	-3%	-£13.29
Stonebridge	204	11%	£69.85	117	10%	£56.73	0%	-£13.12
Kensal Green	162	9%	£56.04	114	10%	£52.15	1%	-£3.89
Dollis Hill	137	7%	£66.91	102	9%	£51.42	2%	-£15.49
Dudden Hill	138	7%	£63.30	102	9%	£48.27	2%	-£15.03
Willesden Green	146	8%	£62.10	89	8%	£44.22	0%	-£17.89
Mapesbury	146	8%	£50.52	85	8%	£46.23	0%	-£4.29
Kilburn	126	7%	£60.67	84	7%	£43.89	1%	-£16.78
Welsh Harp	59	3%	£74.78	42	4%	£65.75	1%	-£9.03
Queens Park	66	4%	£44.02	39	3%	£47.57	0%	£3.55
Unknown	39	2%	£123.02	34	3%	£85.88	1%	-£37.14
Brondesbury Park	59	3%	£75.58	29	3%	£46.02	-1%	-£29.56
Sudbury	35	2%	£53.55	24	2%	£69.45	0%	£15.90
Fryent	27	1%	£69.97	22	2%	£57.72	1%	-£12.25
Barnhill	50	3%	£80.06	21	2%	£57.17	-1%	-£22.88
Queensbury	27	1%	£87.11	19	2%	£56.11	0%	-£31.00
Alperton	39	2%	£72.70	18	2%	£68.29	0%	-£4.41
Preston	36	2%	£61.26	17	2%	£61.40	0%	£0.15
Tokyington	39	2%	£84.19	16	1%	£42.32	-1%	-£41.87
Wembley Central	39	2%	£55.23	13	1%	£44.39	-1%	-£10.84
Northwick Park	18	1%	£63.55	7	1%	£112.22	0%	£48.67
Kenton	12	1%	£54.99	3	0%	£12.61	0%	-£42.38

## Ward: January 2018 Cap vs Caseload

Table 18: Wards - Jan 18 Caseload vs Capped

Ward Breakdown						
Ward	January 2018 Caseload		January 2018 Capped Claims			caseload % vs capped % variance
	Number	% of caseload	Capped	% of capped	Average Cap	
Harlesden	3365	10%	132	12%	£50.85	2%
Stonebridge	3434	10%	117	10%	£56.73	0%
Kensal Green	2144	6%	114	10%	£52.15	4%
Dollis Hill	1724	5%	102	9%	£51.42	4%
Dudden Hill	1911	5%	102	9%	£48.27	4%
Willesden Green	2596	7%	89	8%	£44.22	0%
Mapesbury	1952	6%	85	8%	£46.23	2%
Kilburn	2712	8%	84	7%	£43.89	0%
Welsh Harp	1414	4%	42	4%	£65.75	0%
Queens Park	1194	3%	39	3%	£47.57	0%
Unknown	575	2%	34	3%	£85.88	1%
Brondesbury Park	1293	4%	29	3%	£46.02	-1%
Sudbury	1233	4%	24	2%	£69.45	-1%
Fryent	1017	3%	22	2%	£57.72	-1%
Barnhill	1716	5%	21	2%	£57.17	-3%
Queensbury	945	3%	19	2%	£56.11	-1%
Alperton	1067	3%	18	2%	£68.29	-1%
Preston	1134	3%	17	2%	£61.40	-2%
Tokyngton	1091	3%	16	1%	£42.32	-2%
Wembley Central	1238	4%	13	1%	£44.39	-2%
Northwick Park	565	2%	7	1%	£112.22	-1%
Kenton	439	1%	3	0%	£12.61	-1%

## Ward Summary

- In terms of distribution, largely in line with the DWP predicted cap data with the largest variance being a reduction of 3% in the Harlesden ward, reducing from the 15% predicted to 12% at January 2018
- However, at 12% the Harlesden Ward still has the largest proportion of capped claims followed by Stonebridge and Kensal Green respectively, each at 10%
- Harlesden and Stonebridge wards also have the highest proportion of HB recipients at 10% each
- The 5 wards with the most capped claims are Harlesden, Stonebridge, Kensal Green, Dollis Hill and Dudden Hill in that order
- The 5 most affected wards is negatively disproportionate when compared against the proportion of HB claims in those wards. These 5 wards account for 36% of the total HB caseload but 50% of all capped claims
- Of the Top 5 affected wards
  - the largest variance in average cap (between predicted and current data) is a reduction of £15.49 in Dollis Hill, going from £66.91 to £51.42.
  - the largest average cap is in Stonebridge at £56.73

## APPENDIX C

### DETAILED ETHNICITY BREAKDOWN

Detailed Ethnicity Breakdown						Broad Ethnicity Breakdown					
Description	Number	%	Capped	%	Average Cap	Description	Number	%	Capped	%	Average Cap
Asian or Asian British: Bangladeshi	90	0%	3	0%	£159.27	Asian	4026	12%	113	10%	£60.30
Asian or Asian British: Chinese	57	0%	5	0%	£80.10						
Asian or Asian British: Indian	1095	3%	18	2%	£50.37						
Asian or Asian British: Pakistani	628	2%	25	2%	£51.64						
Asian or British : Any other Backgrnd	2156	6%	62	5%	£60.30						
Black-Black British:African	3575	10%	148	13%	£54.64	Black	6269	18%	269	24%	£52.15
Black-Black British:Caribbean	2428	7%	110	10%	£49.49						
Black-Black British:Other	266	1%	11	1%	£45.26						
Mixed :Any other mixed background	208	1%	5	0%	£32.27	Mixed	946	3%	51	5%	£44.66
Mixed: White and Asian	344	1%	14	1%	£49.95						
Mixed: White and Black African	149	0%	8	1%	£44.77						
Mixed: White and Black Caribbean	245	1%	24	2%	£44.13	White	6700	19%	217	19%	£51.80
White: Any other White background	2984	9%	69	6%	£51.49						
White: British	3073	9%	138	12%	£53.24						
White: Irish	643	2%	10	1%	£34.14						
Not Held	15630	45%	427	38%	£52.56	Not Held	15630	45%	427	38%	£52.56
Other	1188	3%	52	5%	£50.68	Other	1188	3%	52	5%	£50.68

**This page is intentionally left blank**

Ref EO	Equality objective	Brent 2020	Action	Outcome	Action Owner	Due Date	Progress update	RAG rating
EO1	To know and understand all of our communities	Demand management	Further streamline and re-launch the Council's Equality Analysis (EA) process to ensure it effectively informs and supports decision-making	Council's EA process is an effective tool informing and supporting decision-making	Adina Maglan	Mar -18	The Equality team has reviewed the EA process and a new EA guidance and template have been produced. They will be reviewed by our Legal team and an external Diversity advisor to ensure that the new process is robust. The roll out will be formally launched in late March and will be complemented by EA communication and training (the first sessions will be delivered in March and, following that, one session per month between April 2018 and March 2019). The EA e-learning module is also being reviewed to reflect changes in the EA process.	AMBER
			Carry out an equality analysis of the impacts of the Government's reduced Benefit Cap on Brent residents with protected characteristics (e.g. gender, ethnicity, age) and socio-economic status (incl. family status and household composition) to inform the Council response to the identified needs and gaps	A cross-Council action plan is put in place to help alleviate some of the identified disproportionate impact on Brent residents with protected characteristics	David Oates Adina Maglan	Mar -18	The work on this Equality Analysis has been completed and it is on the Equalities Committee agenda.	GREEN
EO2	To involve our communities effectively	Employment and skills	<p>Implement the recommendations agreed by the Equalities Committee and the Task and Finish working group on Eastern European communities:</p> <ul style="list-style-type: none"> <li>- Hold an Open Doors event for local Eastern European communities in June 2017</li> <li>- Hold at least two drop-in information sessions in local churches, cafes, schools and community hubs on relevant themes identified</li> <li>- Work with Advice4Renters to offer tailored information, advice and assistance for Eastern European residents</li> <li>- Provide support and training to capacity build the organisations and groups working with local Eastern European communities</li> <li>- Apply for available Government funding to further enhance the outreach work with local Eastern European communities</li> </ul>	Emerging Eastern European communities have access to Council services and information about services	Adina Maglan Genevie George Anthony Jemmott	<p>Jun-17</p> <p>Mar-18 (ongoing)</p> <p>Oct-17 (ongoing)</p> <p>Dec-17 (ongoing)</p> <p>Mar-18</p> <p>Nov-17</p>	<p>The progress update on this project is on the Equalities Committee agenda.</p> <p>Summary of progress to date:</p> <ul style="list-style-type: none"> <li>- Brent's first Eastern European (EE) Fair was held on 17 June 2017</li> <li>- Drop in sessions scheduled for March/April 2018 to be delivered in partnership with two community organisations. The first session has been delivered on 3 November in partnership with the Romanian Embassy and Consulate and Brent Registration &amp; Nationality and Social Care services.</li> <li>- Advice4Renters is part of the EE network and offers tailored housing advice workshops for the organisations supporting EE communities. The council also supported Advice4Renters in producing a leaflet for EE residents and in promoting their services among these groups. The council's Private Sector Licensing team is also working with Advice4Renters and held an information stall at the EE Fair</li> <li>- At the EE network meeting held on 25 September the council has provided relevant information on available funding. The network organisations have been invited to submit bids for funding to further deliver tailored drop in information sessions.</li> <li>- The council has applied on 3 November for Government (DCLG) funding to further enhance its outreach work with emerging communities. The submission is based on a 2 years programme involving outreach work with the Eastern European and Latin American communities</li> </ul>	GREEN

Ref EO	Equality objective	Brent 2020	Action	Outcome	Action Owner	Due Date	Progress update	RAG rating
		Demand management	Support the development of the Stronger Communities strategy aimed at strengthening communities' resilience, improving public protection, and enhancing community cohesion and participation	Communities are more resilient and cohesive  Under-represented groups are effectively involved	Pascoe Sawyers	Mar-18	Work to develop the next Stronger Communities Strategy will commence when the next administration is in place, and is likely to be informed by a public consultation.	GREEN
EO3	To demonstrate leadership in equalities and human rights, both within the council and among partners	Employment and skills  Demand management	Submit an application to further improve Brent's position on the Stonewall Workplace Equality Index  Work in partnership with local Deaf communities and organisations to become the third Local Authority that has signed the British Sign Language (BSL) Charter  Take steps to become a more Dementia-friendly Council  Implement the new legal requirements into the Council's annual Gender Pay Gap auditing and reporting processes  Submit an application for the Best 100 Employers for Race	The Council is an exemplar of good practice on equality, diversity and human rights	Adina Maglan  Relevant services and staff networks	Sep-17  Dec-17  Mar-18  Mar-18  Jun-17  Nov-17  Oct-17	Progress update to date:  - The council's 2018 Stonewall WEI rank is 148 (52 places higher than in 2017 and 147 places higher than in 2016). The work was supported by the staff LGBT+ network. A number of improvements have been identified in terms of LGBT inclusion in the council and across the borough (non-exhaustive list): the introduction of dedicated Sexual Orientation and Transgender Awareness e-learning modules; in partnership with the LGBT+ staff network producing Transitioning at work guidance to support trans colleagues in the workplace; reviewing a number of HR policies (e.g. the Workforce Strategy; Attendance policy & procedure) to ensure these are LGBT inclusive; taking part in the Pride in London march together with Harrow; hosting an LGBT History Month event open to members of the public; establishing new working relationships with external organisations supporting the LGBT community in Brent  - In order to be eligible to sign the BSL Charter the Council must commit to at least three of the five pledges and also demonstrate its commitment to improve on the remaining ones. In carrying out the review of the accessibility of council services, some evidence has been gathered on the council's position in relation to the pledges. However, further work is needed to fully understand the resource implications related to: self-assessment and evidence gathering process, arrangements to identify areas of improvement, communication, staff training, and progress review. This work will be included in the Equalities 2018/19 Action Plan.  - The work on the council's 2016/17 Gender Pay Gap report has already commenced.  - The council successfully submitted an application for the 2017 Best 100 Employers for Race listing rated by Business in the Community. Brent is the only local authority named in the Best Employers for Race 2017 listing	GREEN
EO4	To ensure that local public services are responsive to different needs and treat users with dignity and respect	Employment and skills	Establish a cross-Council Task and Finish group to look at the socio-economic barriers and inequalities experienced by newly emerging Latin American communities and identify recommendations to address these, in partnership with relevant community organisations	Emerging Latin American communities have access to Council services and information about services	Adina Maglan  Genevie George  Melanie Smith	Mar-18	Work on this project has already commenced. The Equality team has already identified and established a contact with a number of local organisations supporting Latin American communities. The team, in partnership with other relevant departments, will engage in local initiatives and events to establish a contact and get a better understanding of the profile and needs of Latin American communities living in Brent.	GREEN

Ref EO	Equality objective	Brent 2020	Action	Outcome	Action Owner	Due Date	Progress update	RAG rating
		Demand management	Establish a cross-Council Task and Finish working group to map out and assess the accessibility of Council services for customers with disabilities, and work in partnership with relevant local community organisations to agree recommendations to address identified inconsistencies and gaps	People with disabilities have a fair access to Council services and information about services they are entitled to	Adina Maglan Margaret Read Relevant services	Mar-18	The Equality team has carried out an accessibility audit. The findings are preliminary, and the decisions around implementing improvement activities will be subject to further detailed analysis and consultation with the relevant services. The team will start engaging via a 4 week consultation with external stakeholders and forums across the wide spectrum of disability (including carers) to inform its final actions / recommendations.	GREEN
EO5  Page 51	To develop and sustain a skilled and committed workforce able to meet the needs of all local people	Employment and skills	Refresh the Equalities & Diversity training offer available to employees and managers (Cultural Diversity, Inclusive Leadership, relevant front-line services training)	The Equalities & Diversity training offer is refreshed, in line with the Council's Workforce strategy and Brent 2020 Vision	Adina Maglan Debra Norman	Oct -17	The Equality and Diversity training offer has been reviewed and was informed by the council's Learning Needs Analysis and the new Workforce Strategy.	GREEN
			Revisit and re-launch the Council's Reasonable Adjustments (RAs) process to ensure that employees' needs are effectively identified and addressed	The needs of employees with disabilities and long term illnesses are effectively identified and addressed where possible	Adina Maglan Relevant staff equality networks	May-17 Oct-17	The Equality team piloted a face to face training on Reasonable Adjustments for managers in May 2017. The feedback from the training was very positive and constructive. Attendees' feedback was used to update the Reasonable / Workplace Adjustments guidance and to further tailor the training content to Brent's specific training needs. The Equality team also produced a handout promoting the internal support arrangements available to Brent employees.	GREEN
			Roll out a face to face RAs training for managers to further increase their awareness of and confidence in dealing with RAs	Managers feel confident in initiating conversations about and dealing with employees' RAs requests				
			Achieve the Timewise accreditation to drive cultural change and best practice on flexible working	The Council is recognised for and builds on its best practice on flexible working	Debra Norman Matthew Dibben	Mar-18	Work on this accreditation has commenced and a meeting with a Timewise representative and Service Managers was held in September 2017.	GREEN

**This page is intentionally left blank**