

**EQUALITY ANALYSIS (EA)**
**Proposal 1 - Reasonable Rents**

<b>POLICY/PROPOSAL:</b>	Brent Equality Analysis - Introduce a new nominations agreement with Registered Providers
<b>DEPARTMENT:</b>	Community Wellbeing
<b>TEAM:</b>	Housing Needs
<b>LEAD OFFICER:</b>	Omari Gayle
<b>DATE:</b>	24/04/2019

**SECTION A – INITIAL SCREENING**

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

As there is an insufficient supply of affordable housing to meet demand, the Council is working to increase all forms of housing supply. This proposal is to implement a policy to offer newly accepted homeless households' accommodation with Assured Shorthold Tenancies (AST) from a Registered Provider (RP) / Registered Social Landlord pursuant to Part 6 of the Housing Act 1996 under the Council's revised allocations scheme (if approved by Cabinet) to end the main homelessness duty.

Under this proposal, the Council will work with RPs to nominate homeless families to accommodation with ASTs that the RP will lease from private owners by offering a more competitive 'Reasonable Rent' through a nominations agreement.

This is not currently possible if the accommodation is classified as TA or for homelessness prevention (where Housing Benefit will only cover 90% of the January 2011 LHA rate). It is also not possible for Private Rented Sector Offers (PRSOs) into RP leased accommodation (where HB and Universal Credit (UC) will only pay 100% of the current LHA rate).

However, if an offer of an AST from a Registered Provider / Registered Social Landlord pursuant to Part 6 of the Housing Act 1996 is made in order to end the main homelessness duty or the relief duty, then a Reasonable Rent charged by an RP can be charged and fully reclaimed from HB or UC.

This would not be classified as TA and so accommodating households through a Part 6 offer would also have the effect of substantially reducing the number of households living in TA. It should be added that such an offer of accommodation under Part 6 of the Housing Act 1996 must be suitable and affordable for the housing applicant in order to discharge the Council's duty to provide temporary accommodation to accepted homeless households under section 193 of the Housing Act 1996. Practically this will not be used for homeless applicants who have already been placed in assured shorthold tenancies in temporary accommodation with a registered social landlord or private registered provider of social housing as temporary accommodation under Part 7 of the 1996 Act. In practice, this proposal will be implemented for newly accepted homeless households. Officers have considered the content of the

Council's Tenancy Strategy, which currently recommends to registered providers of social housing grant that the norm for a fixed term tenancy should be five years but with shorter and/or longer periods for specified groups/circumstances and with Introductory or starter tenancies to be for a term of 12 months. Officers submit that the Council's tenancy strategy is being reviewed and changes thereto will go out for consultation and then submitted to Cabinet for a decision. Officers advise that this proposal will be covered in the Council's revised tenancy strategy.

The Council could expect to immediately avoid cost as a result of not paying the £70.00 PW management fee currently charged by RP's under the HALS scheme, as well as from reduced use of B&B and Annex accommodation.

2. Who may be affected by this policy or proposal?

This proposal may affect homeless households who the council accepts the main homelessness duty to, under homelessness legislation. This means the Council has a statutory duty to secure these households suitable accommodation.

In the past three years, the council has accepted the main homelessness duty to 1,848 households from 01 April 2015 to 31 March 2018. This is an average of approximately 600 per year.

However, since April 2018 the average number of households that the Council has accepted the main homelessness duty to has reduced to an average of 30 households per month or approximately 400 per year, significantly less than previous years due to changes introduced through the Homelessness Reduction Act 2017, which introduced a statutory duty to prevent and relieve homelessness.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, there is relevance to equality and the council's public sector equality duty as within the cohort of people accessing this service some protected groups are over-represented compared to the borough as a whole.

This is due to the criteria through which priority need is established under the relevant legislation: for example, a household may be regarded as being in priority need owing to age, to a physical disability or mental health condition or to pregnancy. It is also an effect of poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households. Black Africans make up 21% of current accepted homeless households compared to 7.9% in the wider borough.

(Source: 2016 population from GLA)

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative

Age		<b>X</b>	
Sex		<b>X</b>	
Race		<b>X</b>	
Disability	<b>X</b>		<b>X</b>
Sexual orientation		<b>X</b>	
Gender reassignment		<b>X</b>	
Religion or belief		<b>X</b>	
Pregnancy or maternity		<b>X</b>	
Marriage		<b>X</b>	

5. Please complete **each row** of the checklist with an “X”.

<b>SCREENING CHECKLIST</b>		
	<b>YES</b>	<b>NO</b>
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	<b>X</b>	
Does the policy or proposal relate to an area with known inequalities?	<b>X</b>	
Would the policy or proposal change or remove services used by vulnerable groups of people?	<b>X</b>	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	<b>X</b>	
<b>If you have answered YES to ANY of the above, then proceed to section B.            If you have answered NO to ALL of the above, then proceed straight to section D.</b>		

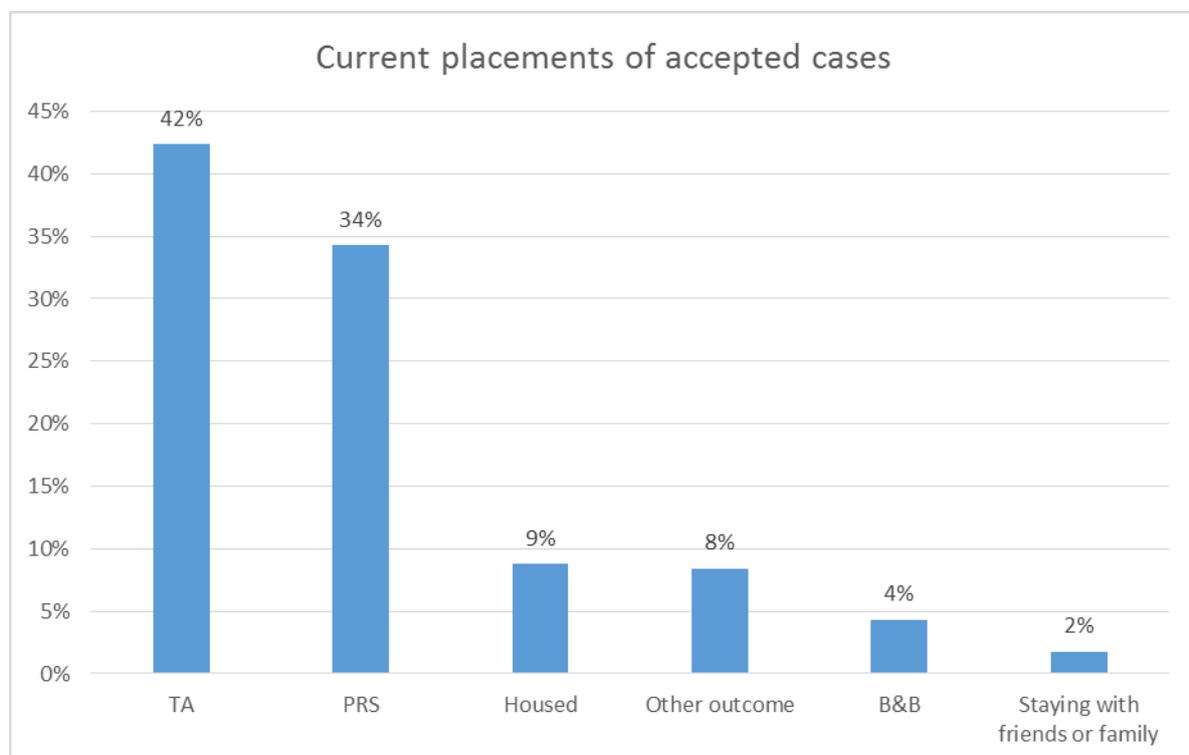
### **SECTION B – IMPACTS ANALYSIS**

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

To evaluate the impact of this proposal, we have analysed the 1,848 homeless households where the main homelessness duty has been accepted for the previous three financial years (April 2015 – March 2018) and assessed their current placements based on their protected characteristics.

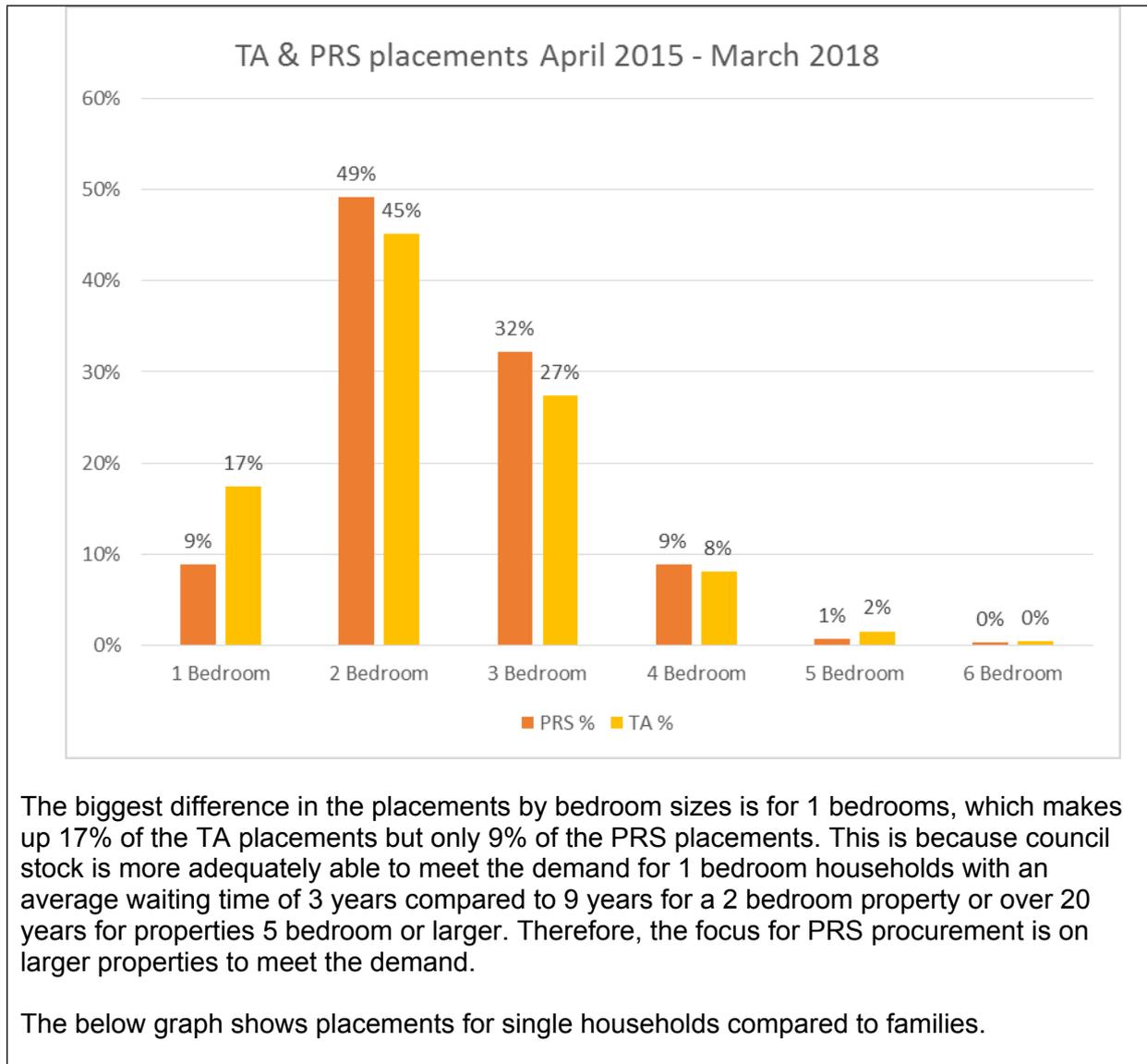
According to the data over the last 3 years:

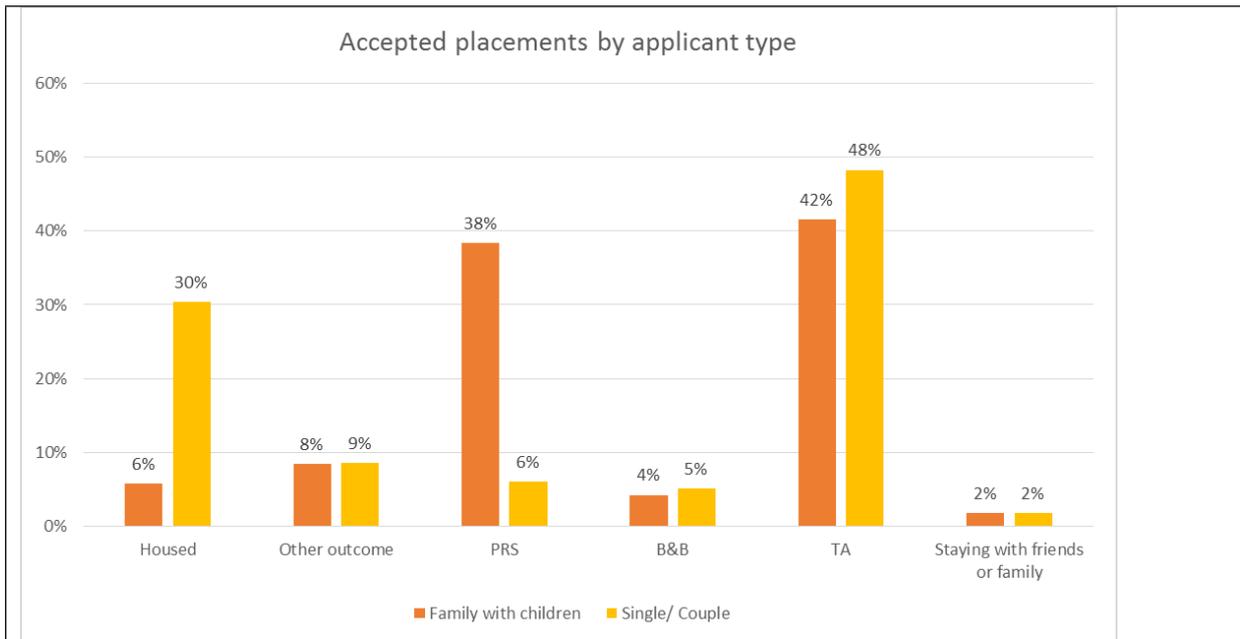
- 42% (783) of homeless households are placed in to TA
- 34% (633) have been placed into the Private Rented Sector (PRS).
- 4% (80) applicants are in emergency bed & breakfast accommodation (B&B)
- 9% (163) have been housed in social housing
- 8% (156) of applicants have had other outcomes i.e. cases discharged or withdrawn.
- 2% (33) of applicants have made other arrangements for TA, potentially staying with family and friends



Cases with other outcomes, staying with family or friends, in B&B or housed will be excluded from the analysis, as the reasonable rents model will not affect these outcomes. The 9% of cases that have been housed have had higher bandings due to medical or other reasons.

76% (1,416) of accepted cases are placed into TA or PRS. The below data shows the different outcomes for this cohort by bedroom need which is proportionately similar for both Stage 2 TA and PRS placements after acceptance.



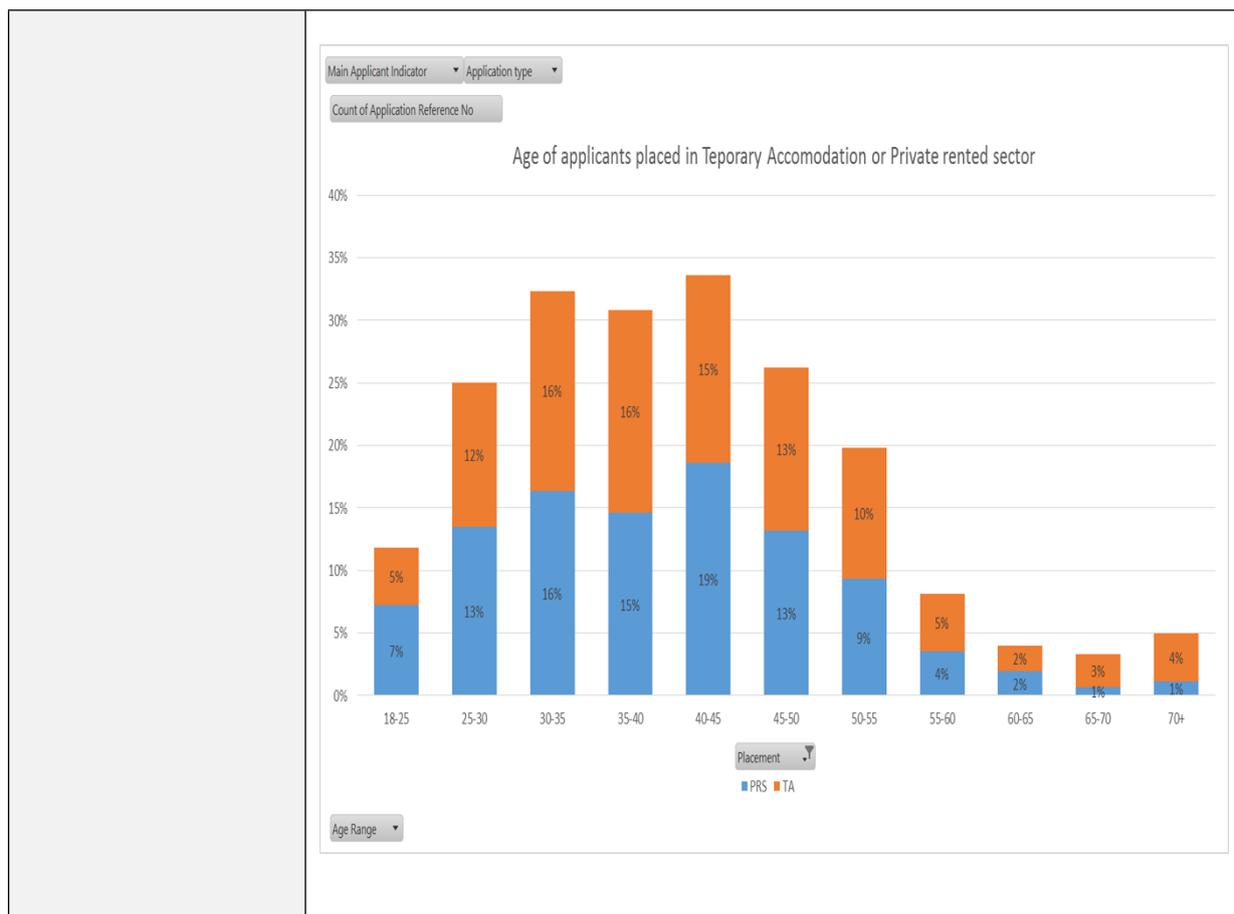


100% of single households have a 1 bedroom housing need. For this cohort the proportion of PRS placements is much lower at 6% of the overall outcomes for single households in the last 3 years.

For the equality impact modelling we will focus on the TA and PRS placements as it is these placements that will be impacted by the introduction of the reasonable rents model.

- For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

<b>AGE</b>	
<b>Details of impacts identified</b>	<p>The below graph shows the proportion of placements by age band. We do see that placement in TA are proportionately higher for those in the age bands of 65 -70 and 70+. This age band makes up 4.7% of the entire cohort of accepted homeless households.</p> <p>We can also see that this age group tends to be single applicants (57%) and / or requiring smaller bedroom sizes 60% require a 1 bed property, 30% a 2 bed and 10% a 3 bed property.</p> <p>The older households on the waiting list are more likely to have a housing need due to disability or health concern, which is being met by suitable accommodation in the TA stock.</p> <p>It is not anticipated that the introduction of the reasonable rents model will change this distribution based on age as properties are allocated on a needs basis.</p>



### DISABILITY

#### Details of impacts identified

Through data matching with housing benefit data we can see that 143 (8%) accepted homeless households are currently receiving some form of disability allowance.

Of the households identified as receiving a disability allowance, the proportion of placement is 97% into TA while 4 (3%) households were placed in PRS.

The other way we can identify disability in our data is through the acceptance decision reason which could be for the below vulnerability reasons:

- ELDERLY
- VULNERABLE ALCOHOL ABUSE
- VULNERABLE INCAPABLE OF FINDING OWN ACCM
- VULNERABLE MEDICAL
- VULNERABLE MENTAL ABUSE
- VULNERABLE OTHER
- VULNERABLE PROBATION OFFICER RECOM.
- VULNERABLE SOC.SERVICES RECOMMENDATION
- VULNERABLE VIOLENCE/PHYSICAL ABUSE

- VULNERABLE:FLEEING HOME IN VIOLENCE/THRE
- VULNERABLE:HAVING BEEN IN CUSTODY/ON REM

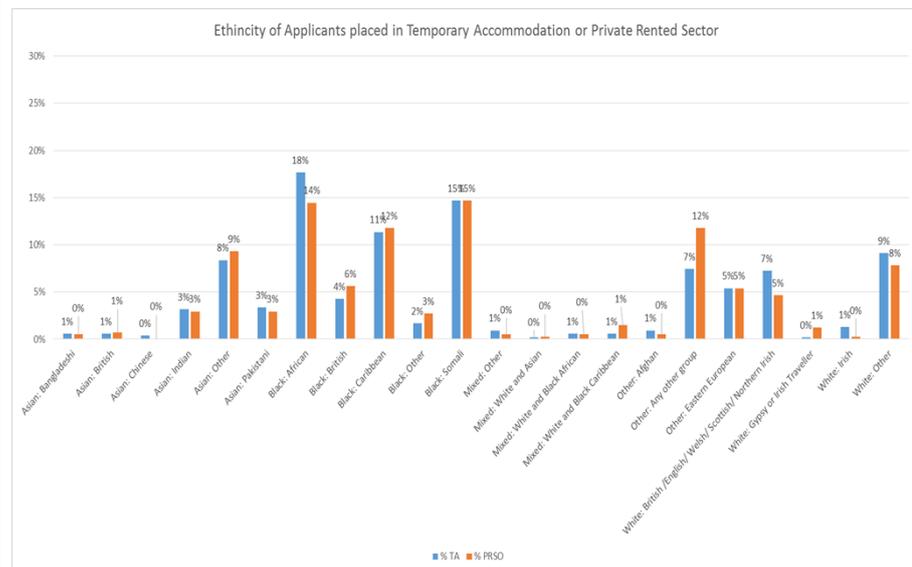
143 (13%) accepted households have been identified as vulnerable in their acceptance decision. Of this cohort 126 (88%) were placed in TA while 17 (12%) had PRS placements.

Through both data sets, we see a higher proportion of households with disability or vulnerability indicators placed in TA. Officers acknowledge that this is can be because of the limitations in procuring accommodation in the private rented sector that can meet the needs of the vulnerable or be managed by those who are vulnerable.

We can only end homelessness duty with an offer of suitable accommodation and this may mean that social housing is the only option for some households and they will continue to be placed in TA while waiting for an offer.

### RACE

The below graph shows placements for accepted households in the last three years by ethnicity.

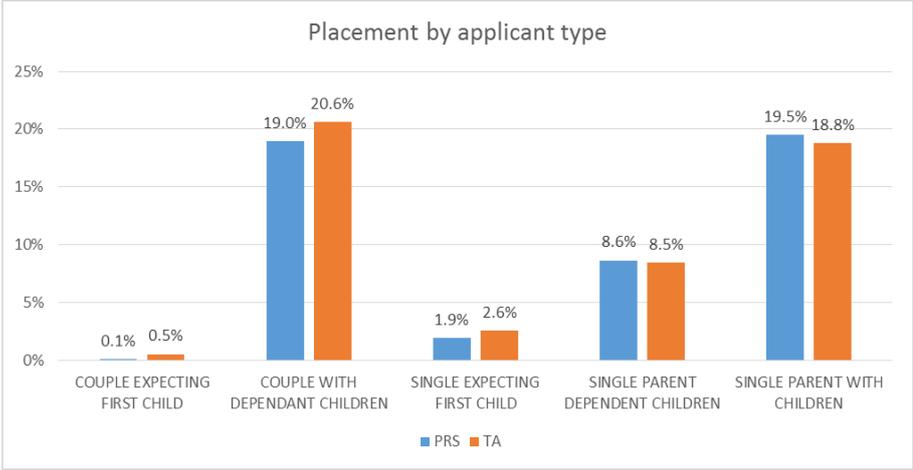


### Details of impacts identified

The graph shows proportionately similar distribution for TA and PRS placements among those ethnic groups being accepted on the housing waiting list. Therefore officers expect a neutral impact with the introduction of the reasonable rents model.

Officers note that the ethnicity of the main applicant of the household has been used here as a proxy for the ethnicity of the household. We are mindful that using main applicant only may makes an assumption about a homogenous household makeup that may disproportionately exclude the mixed race community in our analysis.

	<p>Ethnicity data is unknown for 619 (33%) applicants.</p>									
<b>SEX</b>										
<b>Details of impacts identified</b>	<p>The below graph shows the proportion of applicants placed in TA or PRS based on their sex.</p>  <table border="1" data-bbox="488 640 1353 1223"> <caption>Sex of applicants placed in Temporary Accommodation or Private Rented sector</caption> <thead> <tr> <th>Sex</th> <th>PRS (%)</th> <th>TA (%)</th> </tr> </thead> <tbody> <tr> <td>FEMALE</td> <td>69%</td> <td>65%</td> </tr> <tr> <td>MALE</td> <td>31%</td> <td>35%</td> </tr> </tbody> </table> <p>The proportion of placements in PRS and TA are relatively similar for both sexes.</p> <p>It is anticipated that the introduction of the reasonable rents model will have a neutral impact on households based on their sex.</p>	Sex	PRS (%)	TA (%)	FEMALE	69%	65%	MALE	31%	35%
Sex	PRS (%)	TA (%)								
FEMALE	69%	65%								
MALE	31%	35%								
<b>SEXUAL ORIENTATION</b>										
<b>Details of impacts identified</b>	<p>There is insufficient data regarding sexual orientation of the applicants accepted as homeless in the last three years to assess the impact on these groups.</p> <p>Although we do know that LGBTQI people make up between 5 and 7% of the UK population and between 4-6% of Brent's. (Source: Stonewall and GLA for population projection)</p> <p>We do not however, consider there to be any adverse impacts on this group.</p>									
<b>PREGNANCY AND MATERNITY</b>										

<p><b>Details of impacts identified</b></p>	<p>There is insufficient data on pregnancy or maternity in the data set to carry out full analysis. However, there are acceptance reasons based on pregnancy.</p> <p>The below graph shows placement of families accepted based on their family composition. Other acceptance reasons could include medical or vulnerability, which is not mutually exclusive.</p> <div data-bbox="488 544 1401 1014" data-label="Figure">  <table border="1"> <caption>Placement by applicant type</caption> <thead> <tr> <th>Applicant Type</th> <th>PRS (%)</th> <th>TA (%)</th> </tr> </thead> <tbody> <tr> <td>COUPLE EXPECTING FIRST CHILD</td> <td>0.1%</td> <td>0.5%</td> </tr> <tr> <td>COUPLE WITH DEPENDANT CHILDREN</td> <td>19.0%</td> <td>20.6%</td> </tr> <tr> <td>SINGLE EXPECTING FIRST CHILD</td> <td>1.9%</td> <td>2.6%</td> </tr> <tr> <td>SINGLE PARENT DEPENDENT CHILDREN</td> <td>8.6%</td> <td>8.5%</td> </tr> <tr> <td>SINGLE PARENT WITH CHILDREN</td> <td>19.5%</td> <td>18.8%</td> </tr> </tbody> </table> </div> <p>Placements in TA or PRS and are similar for families accepted based on family composition.</p> <p>We do not expect any impact on these groups with the introduction of reasonable rents.</p>	Applicant Type	PRS (%)	TA (%)	COUPLE EXPECTING FIRST CHILD	0.1%	0.5%	COUPLE WITH DEPENDANT CHILDREN	19.0%	20.6%	SINGLE EXPECTING FIRST CHILD	1.9%	2.6%	SINGLE PARENT DEPENDENT CHILDREN	8.6%	8.5%	SINGLE PARENT WITH CHILDREN	19.5%	18.8%
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<b>RELIGION OR BELIEF</b>																			
<p><b>Details of impacts identified</b></p>	<p>There is insufficient data regarding religion of the applicants accepted as homeless in the last three years to assess the impact on these groups.</p> <p>2011 Census data provides us with the following information about religion and belief in the wider borough.</p> <table border="1" data-bbox="488 1597 1393 1845"> <thead> <tr> <th>Religion or belief</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Christianity</td> <td>41%</td> </tr> <tr> <td>Islam</td> <td>19%</td> </tr> <tr> <td>Hinduism</td> <td>18%</td> </tr> <tr> <td>No religion</td> <td>11%</td> </tr> <tr> <td>Judaism</td> <td>1%</td> </tr> <tr> <td>Buddhism</td> <td>1%</td> </tr> </tbody> </table> <p>We do not however consider there to be any adverse impacts on any religious group based on their religion or belief.</p>	Religion or belief	Percentage	Christianity	41%	Islam	19%	Hinduism	18%	No religion	11%	Judaism	1%	Buddhism	1%				
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<b>GENDER REASSIGNMENT</b>	
<b>Details of impacts identified</b>	<p>There is insufficient data regarding gender reassignment of the applicants accepted as homeless in the last three years to assess the impact on these groups.</p> <p>The Diversity in Brent document states that 3,400 people in Brent experience gender variance (based on GLA population projections that equates to 1% of the borough population) Source: Stonewall.</p> <p>We do not however consider there to be any adverse impacts on this group based on gender variance.</p>
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	
<b>Details of impacts identified</b>	<p>There is insufficient data regarding marital status of the applicants accepted as homeless in the last three years to assess the impact on these groups. We do not however consider there to be any adverse impacts on this group.</p>

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No, the proposal to introduce a new nominations agreement with RPs does not identify any impacts that could be unlawful under the Equality Act.

The new nominations agreement with RPs will provide a household with an offer of accommodation under Part 6 of the Housing Act 1996. This offer must be suitable and affordable for the housing applicant in order to discharge the Council's duty to provide temporary accommodation to accepted homeless households under section 193 of the Housing Act 1996.

Therefore, it advances equality of opportunity in the way that it is a fair and transparent means of allocating homes, based on the needs to the applicant.

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes, a number of engagement initiatives were undertaken to gather the views of those affected by the changes to the policy as outlined below. Further engagement is not required.

Formal consultation was launched on 12 November 2018 and ended on 21 January 2019, through an on-line consultation survey. As well as advertising the consultation survey on the Council's website, and on the Locata home page, every household currently on the housing register (including Band D) was notified. Consultation workshops were also held with the following stakeholders;

- Members
- Temporary Accommodation User Forums (attended by approximately 500 households over 5 Forums)
- Registered Providers
- Voluntary Sector
- Adult Social Care
- Children's and Young People Services
- Brent Housing Management

As some of the issues that were being consulted on are fairly technical, the purpose of these workshops was to go through each issue in detail and to give people the opportunity to ask questions to clarify what we were asking them to give their opinion on. Attendees were then encouraged to express their opinions via the consultation survey that was made available via the Council's consultation portal.

An independent research company, bmg Research were also commissioned to facilitate 2 workshops on the 12 March 2019. The first workshop was made up of a group of housing professionals and the second made up of a cross section of residents of the borough. The purpose of these workshops was to give people more of an opportunity to debate the implications and express their views of the various proposals and possible impact on households seeking social housing.

5. Please detail any areas identified as requiring further data or detailed analysis.

Data on applicants and households in regards to their protected characteristics, particularly in areas where limited data prevents us drawing any conclusions (as listed below) would help improve our equality analysis.

- Disability
- Sexual orientation
- Gender reassignment
- Religion or belief
- Pregnancy or maternity
- Marriage

The introduction of a new customer portal from April 2018 where homeless applicants can make an application directly and include their demographic information will help to improve data capture in this area.

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

No negative impacts have been identified based on protected characteristics.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

All allocations of properties made under this proposal will be monitored in line with the Council's Allocation Scheme and statutory reporting requirements to relevant agencies. Operational meetings.

**SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Analysis of placements carried out in the last three years shows that different housing products can be more appropriate for different groups based on needs and availability. The emphasis of the allocations scheme is to ensure suitable accommodation is offered to those households that are in priority need based on clear and equitable guidelines.

The reasonable rents model introduces another option for households to access suitable accommodation, however for those households in need through disability or medical reasons access will remain the same to social housing either directly or through TA.

**SECTION D – RESULT**

<i>Please select one of the following options. Mark with an "X".</i>		
<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	<b>X</b>
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	

**SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>

**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Omari Gayle
<b>REVIEWING OFFICER:</b>	Lavdrim Krashi
<b>HEAD OF SERVICE:</b>	Laurence Coaker

**EQUALITY ANALYSIS (EA)**
**Proposal 2 – Retain Band D waiting time**

<b>POLICY/PROPOSAL:</b>	Allowing households currently in Band D to retain the waiting time they accrued when in a higher band if they become homeless and are placed in Temporary Accommodation
<b>DEPARTMENT:</b>	Community Wellbeing
<b>TEAM:</b>	Housing Needs Service
<b>LEAD OFFICER:</b>	Omari Gayle
<b>DATE:</b>	24/04/2019

**SECTION A – INITIAL SCREENING**

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Following the implementation of the Localism Act 2011, the Council made amendments to the Allocation Scheme that was in place at that time, to reduce the number of households who were in a priority band for social housing. These changes were made because at the time, there were approximately 19,500 households in a priority band on the Housing Register, and the supply of social housing to meet this demand was approximately 600 properties per year. Therefore, the vast majority of these households would never realistically receive an offer of social housing. This change was therefore made in order to manage expectations.

In 2014 amendments were made to the scheme, to prioritise those households in the greatest need, e.g. homeless families, severe overcrowding, medical conditions that were severely affected by the current housing, and poor housing conditions that met the definition of a Category 1 Hazard (defined by the 2005 Regulations) (Part 1 & 7 of the Housing Act 2004).

These changes affected approximately 14,000 households, the majority of whom (approximately 10,000) were cases of overcrowding in the Private Rented Sector (PRS) who were lacking one bedroom. These 14,000 households would never realistically have received an offer of social housing, because there were approximately 5,500 households who had a greater need. Therefore, these 14,000 households were moved from priority Band C to Band D, resulting in them being ineligible to bid.

The waiting time these households had accrued while they were in Band C, was retained when they were relegated to Band D. If one of these households subsequently become homeless and are placed in TA, they are automatically placed in Band C, as a cohort who are given reasonable preference – accepted homeless. However, their registration date starts from the date of their placement in TA for being homeless, and they do not retain any

of the waiting time they accrued when they were previously in Band C due to being prioritised under the former Allocation Scheme.

This proposed amendment would allow households who were moved from a higher Band to Band D, to retain the waiting time accrued in that higher band, and subsequently Band D, if the Council accepts the main duty under homeless legislation and they are placed in settled TA (as opposed to stage 1 emergency TA).

2. Who may be affected by this policy or proposal?

There are two groups impacted by this proposal:

1. Those currently in Band C and accepted as homeless or households who are new to homelessness as they may be negatively impacted
2. Those currently in Band D who have previously accrued waiting time in a higher band as they may be positively impacted by this proposal if they were to become homeless

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, there is relevance to equality and the council's public sector equality duty as within the cohort of people accessing this service some protected groups are over-represented compared to the borough as a whole.

This is due to the criteria through which priority need is established under the relevant legislation: for example, a household may be regarded as being in priority need owing to age, to a physical disability or mental health condition or to pregnancy. It is also an effect of poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households. Black households make up 52% of current accepted homeless households compared to 21% in the wider borough.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		x	
Sex		x	
Race		X	
Disability		X	

Sexual orientation		<b>X</b>	
Gender reassignment		<b>X</b>	
Religion or belief		<b>X</b>	
Pregnancy or maternity		<b>X</b>	
Marriage		<b>X</b>	

5. Please complete **each row** of the checklist with an “X”.

<b>SCREENING CHECKLIST</b>		
	<b>YES</b>	<b>NO</b>
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	<b>X</b>	
Does the policy or proposal relate to an area with known inequalities?	<b>X</b>	
Would the policy or proposal change or remove services used by vulnerable groups of people?	<b>X</b>	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	<b>X</b>	
<b>If you have answered YES to ANY of the above, then proceed to section B.            If you have answered NO to ALL of the above, then proceed straight to section D.</b>		

## **SECTION B – IMPACTS ANALYSIS**

8. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

To analyse the impact of this proposal we have compared the protected characteristics of the two cohorts impacted by this proposal:

1. The 2,310 households currently in Band C and accepted as homeless
2. The households currently in band D who have previously accrued waiting time in a higher band.

For the analysis, we want to focus on the cohort who are more likely to benefit from this proposal. To isolate these households from the 18,250 in Band D we have used the priority date to identify the households impacted in 2014 by amendments to the allocations scheme. These households have a priority date before 01 February 2014. There are currently 8,793 households who meet this criterion or 48% of the Band D waiting list.

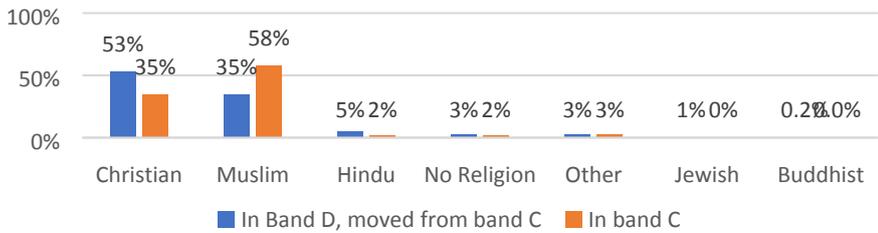
It is noted above that approximately 14,000 households were moved to Band D in 2014. However, changes in circumstances in the intervening 5 years has reduced this number to 8,793.

9. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

<b>AGE</b>													
<b>Details of impacts identified</b>	<p>As shown in the following graph, there are small differences in the age characteristic of the two cohorts.</p> <div style="text-align: center;"> <table border="1" style="margin: 10px auto; border-collapse: collapse;"> <caption>Age band distribution in two cohorts</caption> <thead> <tr> <th>Age Group</th> <th>In Band D, moved from band C (%)</th> <th>In band C (%)</th> </tr> </thead> <tbody> <tr> <td>16-24</td> <td>1%</td> <td>2%</td> </tr> <tr> <td>25-64</td> <td>92%</td> <td>95%</td> </tr> <tr> <td>65 and over</td> <td>6%</td> <td>3%</td> </tr> </tbody> </table> </div> <p>However, the presence of younger and older households is smaller than that in the wider Brent population.</p> <ul style="list-style-type: none"> <li>• Younger households are under-represented in the two cohorts, whereas, they make up 12% of Brent population.</li> <li>• Similarly, older households are between 6% to 3% in the two cohorts, whereas, they make up 11% of Brent population.</li> </ul>	Age Group	In Band D, moved from band C (%)	In band C (%)	16-24	1%	2%	25-64	92%	95%	65 and over	6%	3%
Age Group	In Band D, moved from band C (%)	In band C (%)											
16-24	1%	2%											
25-64	92%	95%											
65 and over	6%	3%											
<b>DISABILITY</b>													

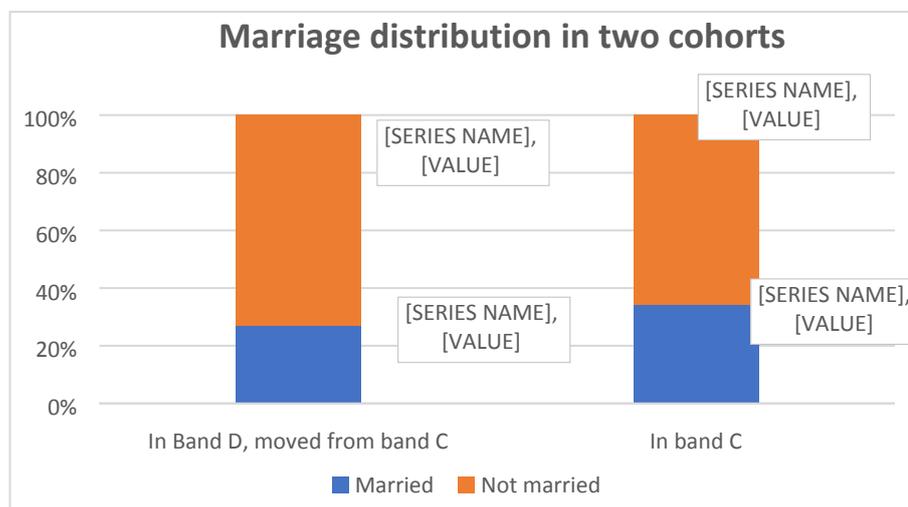
<b>Details of impacts identified</b>	<p>Less than 1% of the pre-Feb 2014 cohort in D have a disability. This is 2% in band C cohort. The presence of disability in both cohorts is much less than the 14% in the wider Brent population.</p> <p>We believe the low presence of disability is likely to be caused by the lack of data collection on this characteristic. Only 45% of the records in both cohorts have disability data completed, as it is not routinely recorded in Locata applications.</p> <p>Disability of households is criteria used in assessing housing priority and need, therefore if households' circumstances changed based on disability their case would be re-assessed to account for any change in housing need.</p>																		
<b>RACE</b>																			
<b>Details of impacts identified</b>	<p>As presented in the following graph, the ethnic makeup of the two cohorts are very similar. There would be no impact on the race characteristics as both cohorts are similar.</p> <div data-bbox="488 1021 1401 1424" data-label="Figure"> <p style="text-align: center;"><b>Ethnicity distribution in two cohorts</b></p> <table border="1"> <thead> <tr> <th>Ethnicity</th> <th>In Band D, moved from band C (%)</th> <th>In band C (%)</th> </tr> </thead> <tbody> <tr> <td>Black</td> <td>51%</td> <td>52%</td> </tr> <tr> <td>Asian</td> <td>21%</td> <td>21%</td> </tr> <tr> <td>White</td> <td>20%</td> <td>18%</td> </tr> <tr> <td>Other</td> <td>5%</td> <td>6%</td> </tr> <tr> <td>Mixed</td> <td>3%</td> <td>3%</td> </tr> </tbody> </table> </div> <p>However, compared to the wider Brent population, black households are over-represented in both cohorts. In Brent, black people make up 21% whereas this is 51% to 52% in both cohorts.</p> <p>Officers note that the ethnicity of the main applicant of the household has been used here as a proxy for the ethnicity of the household. We are mindful that using main applicant only may makes an assumption about a homogenous household makeup that may disproportionately exclude the mixed race community in our analysis.</p>	Ethnicity	In Band D, moved from band C (%)	In band C (%)	Black	51%	52%	Asian	21%	21%	White	20%	18%	Other	5%	6%	Mixed	3%	3%
Ethnicity	In Band D, moved from band C (%)	In band C (%)																	
Black	51%	52%																	
Asian	21%	21%																	
White	20%	18%																	
Other	5%	6%																	
Mixed	3%	3%																	
<b>SEX</b>																			

<p><b>Details of impacts identified</b></p>	<p>As the graph below shows, female- headed households are over-represented in both pre-Feb band D cohort (56%) and band C cohort (69%). Females make up 49% of Brent’s population.</p> <div data-bbox="488 443 1401 779"> <p style="text-align: center;"><b>Gender distribution in two cohorts</b></p> <table border="1"> <caption>Gender distribution in two cohorts</caption> <thead> <tr> <th>Gender</th> <th>In Band D, moved from band C</th> <th>In band C</th> </tr> </thead> <tbody> <tr> <td>Male</td> <td>54%</td> <td>31%</td> </tr> <tr> <td>Female</td> <td>56%</td> <td>69%</td> </tr> </tbody> </table> </div> <p>In general, women are over represented in the cohorts receiving housing services, as women are more likely to access statutory homelessness support as “a person with whom dependent children reside or might reasonably be expected to reside” places them in priority need for accommodation. (Source: Housing Act 1996, Section 189)</p>	Gender	In Band D, moved from band C	In band C	Male	54%	31%	Female	56%	69%						
Gender	In Band D, moved from band C	In band C														
Male	54%	31%														
Female	56%	69%														
<p><b>SEXUAL ORIENTATION</b></p>																
<p><b>Details of impacts identified</b></p>	<p>LGBT households make up only 2% of the pre-Feb band D and 3% of band C. These two percentages are below that of LGBT in Brent’s population, which 4.6%. The following graph shows the sexual orientation in the two cohorts:</p> <div data-bbox="488 1328 1401 1653"> <p style="text-align: center;"><b>Sexuality distribution in two cohorts</b></p> <table border="1"> <caption>Sexuality distribution in two cohorts</caption> <thead> <tr> <th>Sexuality</th> <th>In Band D, moved from band C</th> <th>In band C</th> </tr> </thead> <tbody> <tr> <td>Bisexual</td> <td>1%</td> <td>2%</td> </tr> <tr> <td>Gay</td> <td>1%</td> <td>1%</td> </tr> <tr> <td>Heterosexual</td> <td>98%</td> <td>96%</td> </tr> <tr> <td>Other</td> <td>0%</td> <td>1%</td> </tr> </tbody> </table> </div> <p>We think these discrepancies are because statutory priorities given to households with children plays a key role in the smaller numbers of LGBT in both cohorts.</p> <p>Officers are mindful that data on sexual orientation is only available on 9% of records.</p>	Sexuality	In Band D, moved from band C	In band C	Bisexual	1%	2%	Gay	1%	1%	Heterosexual	98%	96%	Other	0%	1%
Sexuality	In Band D, moved from band C	In band C														
Bisexual	1%	2%														
Gay	1%	1%														
Heterosexual	98%	96%														
Other	0%	1%														
<p><b>PREGANCY AND MATERNITY</b></p>																

<b>Details of impacts identified</b>	<p>There is insufficient data on pregnancy and maternity for the Band D cohort as this is not routinely recorded in the Locata system where these cases are held. It is recorded in Northgate where homeless applications are processed so we can see that 10% of those on band C have a pregnancy indicator.</p> <p>Pregnancy and maternity are criteria in assessing housing priority and need, therefore if households' circumstances changed based on pregnancy or maternity their case would be re-assessed to account for any change in housing need.</p>																								
<b>RELIGION OR BELIEF</b>																									
<b>Details of impacts identified</b>	<p>We see similar distribution of religion in both cohorts.</p> <div data-bbox="488 819 1401 1160" style="border: 1px solid gray; padding: 10px; margin: 10px 0;"> <p style="text-align: center;"><b>Religion distribution in two cohorts</b></p>  <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 5px;"> <thead> <tr> <th>Religion</th> <th>In Band D, moved from band C (%)</th> <th>In band C (%)</th> </tr> </thead> <tbody> <tr> <td>Christian</td> <td>53%</td> <td>35%</td> </tr> <tr> <td>Muslim</td> <td>35%</td> <td>58%</td> </tr> <tr> <td>Hindu</td> <td>5%</td> <td>2%</td> </tr> <tr> <td>No Religion</td> <td>3%</td> <td>2%</td> </tr> <tr> <td>Other</td> <td>3%</td> <td>3%</td> </tr> <tr> <td>Jewish</td> <td>1%</td> <td>0%</td> </tr> <tr> <td>Buddhist</td> <td>0.2%</td> <td>0%</td> </tr> </tbody> </table> </div> <p>Compared to the wider Brent population, Muslim households are over represented in both the band D pre Feb 2014 cohort (35%) and in the band C cohort (58%). Christian households are over represented only in the band D pre Feb 2014 cohort (53%). Hindus are underrepresented, as they make up 5% and 2% compared to 20% in the Brent population.</p> <p>It is important to note that data on religion is available on 27% of the household records, which is not robust enough to draw conclusions.</p>	Religion	In Band D, moved from band C (%)	In band C (%)	Christian	53%	35%	Muslim	35%	58%	Hindu	5%	2%	No Religion	3%	2%	Other	3%	3%	Jewish	1%	0%	Buddhist	0.2%	0%
Religion	In Band D, moved from band C (%)	In band C (%)																							
Christian	53%	35%																							
Muslim	35%	58%																							
Hindu	5%	2%																							
No Religion	3%	2%																							
Other	3%	3%																							
Jewish	1%	0%																							
Buddhist	0.2%	0%																							
<b>GENDER REASSIGNMENT</b>																									
<b>Details of impacts identified</b>	<p>There is insufficient data on gender reassignment within these cohorts. We do not however expect there to be any impacts on these groups based on this protected characteristic</p>																								
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>																									

**Details of impacts identified**

Of the band D pre-Feb 2014 cohort, 73% of the households are not married or in civil partnership. In band C cohort, 62% are not married. The following graph illustrates this. In the wider Brent population, 47% are not married.



The above figures are expected for the households in need of the council's housing services. The figures reflect gender roles, single parenting and economic deprivation related to the households seeking the council is housing services.

**10. Could any of the impacts you have identified be unlawful under the Equality Act 2010?**

The proposal to retain priority time accrued in a higher band does not impact on any cohort based on their protected characteristics.

Housing assessments are reviewed when the circumstances of a household change and a households priority need and the type of accommodation required will be reassessed as appropriate to ensure fair and equitable allocation of housing.

**11. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?**

Yes, a number of engagement initiatives were undertaken to gather the views of those affected by the changes to the policy as outlined below. Further engagement is not required.

Formal consultation was launched on 12 November 2018 and ended on 21 January 2019, through an on-line consultation survey. As well as advertising the consultation survey on the Council's website, and on the Locata home page, every household currently on the housing register (including Band D) was notified. Consultation workshops were also held with the following stakeholders;

- Members
- Temporary Accommodation User Forums (attended by approximately 500 households over 5 Forums)

- Registered Providers
- Voluntary Sector
- Adult Social Care
- Children's and Young People Services
- Brent Housing Management

As some of the issues that were being consulted on are technical, the purpose of these workshops was to go through each issue in detail and to give people the opportunity to ask questions to clarify what we were asking them to give their opinion on. Attendees were then encouraged to express their opinions via the consultation survey that was made available via the Council's consultation portal.

An independent research company, bmg Research were also commissioned to facilitate 2 workshops on the 12 March 2019. The first workshop was made up of a group of housing professionals and the second made up of a cross section of residents of the borough. The purpose of these workshops was to give people more of an opportunity to debate the implications and express their views of the various proposals and possible impact on households seeking social housing.

12. Please detail any areas identified as requiring further data or detailed analysis.

Data on applicants and households in regards to their protected characteristics, particularly in areas where limited data prevents us drawing any conclusions (as listed below) would help improve our equality analysis.

- Disability
- Sexual orientation
- Gender reassignment
- Religion or belief
- Pregnancy or maternity
- Marriage

The introduction of a new customer portal from April 2018 where homeless applicants can make an application directly and include their demographic information will help to improve data capture in this area.

13. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

No negative impacts have been identified based on protected characteristics

14. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

All allocations of properties made under this proposal will be monitored in line with the Council's Allocation Scheme and statutory reporting requirements to relevant agencies. Operational meetings.

## **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The analysis of data available shows no advantage or disadvantage to any groups based on their protected characteristics, therefore the impact of this proposal is neutral.

**SECTION D – RESULT**

*Please select one of the following options. Mark with an “X”.*

<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	<b>X</b>
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	

**SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>

**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Omari Gayle	
<b>REVIEWING OFFICER:</b>	Lavdrim Krashi	
<b>HEAD OF SERVICE:</b>	Laurence Coaker	

**EQUALITY ANALYSIS (EA)**
**Proposal 3 – Local Lettings Transfer List**

<b>POLICY/PROPOSAL:</b>	Local Lettings Policy - Give priority to households who need a transfer to bid for new accommodation that becomes available on their current estate.
<b>DEPARTMENT:</b>	Community Wellbeing
<b>TEAM:</b>	Housing Needs Service
<b>LEAD OFFICER:</b>	Omari Gayle
<b>DATE:</b>	24/04/2019

**SECTION A – INITIAL SCREENING**

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

A tenant can apply for a transfer on the basis of housing need – for example that the household is overcrowded – and the application will be assessed on the basis of reasonable preference.

There are currently 267 Brent Council Tenants who are registered for a management transfer due to overcrowding, medical or other reason and have been assessed in Bands A-C and therefore are able to place bids.

The Council is proactively working to increase the supply of affordable accommodation in Brent, including building new Council homes. Unfortunately, Brent is not blessed with swathes of brownfield sites, therefore most of the new homes will be built on available land on existing estates i.e. infill. The intention is to make the best use of existing available land, for example by demolishing underutilised garages.

This proposal is to give existing tenants who are registered for a transfer priority to bid for new units that become available on their estate, to enable them to remain on the estate and avoid having to relocate to another area. This will also increase community acceptance of infill schemes, as residents can see how it would benefit them.

2. Who may be affected by this policy or proposal?

By giving existing tenants registered for a transfer priority to bid for new units that become available on their estate they will be better placed to secure a transfer, over other tenants who may have been waiting for a longer period but with no new units available on their estate.

This proposal offers benefit to those who are on the transfer list and have no issue with the area they are living, but there are some on the transfer list who may be there due to fear of violence or hate crime in their area and need to move from the area they are in.

It also affects homeless households who the council has accepted the main rehousing duty under homelessness legislation, currently there are 2,450 such households. The new in-fill unit/s will be 100% marked for council tenants (transfers) – the voids they subsequently leave will be allocated 70% to Homeless families.

At present Council social lettings plan aims at:

- 70% of properties are prioritised to approve homeless households.
- 20% of properties are prioritised to council tenants (transfers).
- 10% of properties are prioritised for households in the Private Rented Sector (PRS) who have an identified housing need.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, there is relevance to equality and the council's public sector equality duty as within the cohort of people accessing this service some protected groups are over-represented compared to the borough as a whole.

This is due to the criteria through which priority need is established under the relevant legislation: for example, a household may be regarded as being in priority need owing to age, to a physical disability or mental health condition or to pregnancy. It is also an effect of poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households. Black Africans make up 21% of current accepted homeless households compared to 7.9% in the wider borough.

(Source: 2016 population from GLA)

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		x	
Sex		x	
Race		x	
Disability		x	
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity		x	

Marriage		<b>x</b>	
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5. Please complete **each row** of the checklist with an “X”.

<b>SCREENING CHECKLIST</b>		
	<b>YES</b>	<b>NO</b>
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	<b>x</b>	
Does the policy or proposal relate to an area with known inequalities?	<b>x</b>	
Would the policy or proposal change or remove services used by vulnerable groups of people?	<b>x</b>	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	<b>x</b>	
<b>If you have answered YES to ANY of the above, then proceed to section B.            If you have answered NO to ALL of the above, then proceed straight to section D.</b>		

**SECTION B – IMPACTS ANALYSIS**

15. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

To assess the impact of this proposal, we have identified and analysed 267 households that make-up the council’s transfer waiting list. This cohort was obtained from the social housing allocation system (Locata) used by Brent Council.

The 267 households were then matched against a list of 25 “in-fill” sites. 18 households (out of the 267 households) were successfully selected as they matched eight “in-fill” sites. This is 6.7% of 267 households in the transfer waiting list.

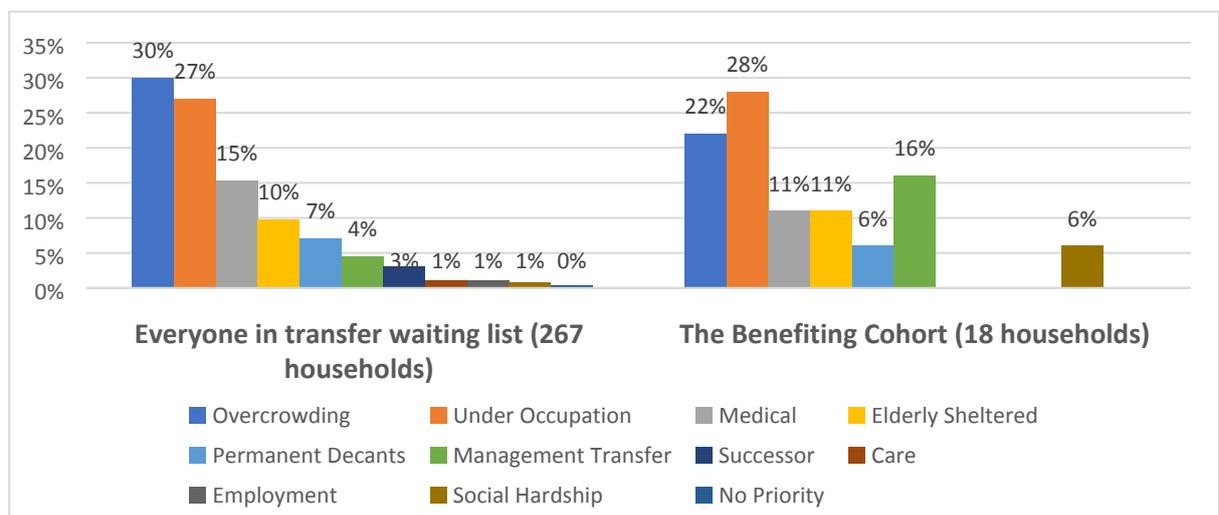
The following methods were used to search for matches:

- Exact postcode match.
- Exact address match.
- Same block or street match.
- Partial postcode matching using ‘postcode sectors’, this is by using postcodes without the last two digits (example: HA9 0). This resulted in a large number of matches, which were then investigated individually, and further matches were identified.

Households were labelled to indicate which cohort they belong to. Therefore, 18 households were labelled as ‘matched’ and 249 were labelled as ‘unmatched’.

A series of pivot tables and illustrative graphs were created to analyse data related to each of the protected characteristics for the heads of the households, these were repeated for each cohort. In some areas, further complex analysis was concluded. For example, when analysing age data, we also added banding reasons from the housing register to show the type of needs of the cohort.

In addition, the band reason was analysed for all 267 households on the transfer waiting list and the matched 18 households. This is because the reason for being in the transfer waiting list is key to understanding patterns and trends. The following graph illustrates the banding reasons for both cohorts:

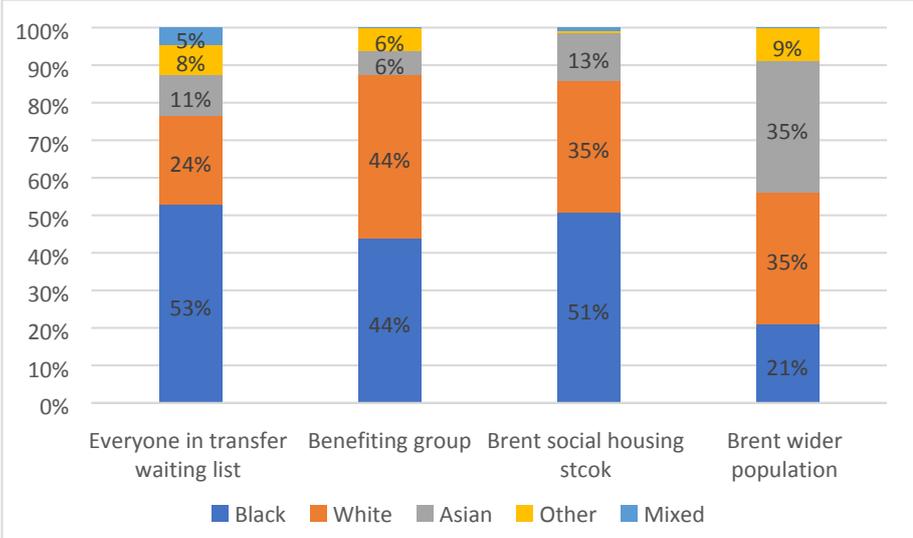


To clarify the meaning of the unclear categories in the above graph. 'Management Transfer' covers households with critical need for a transfer such as harassment and fear of violence. 'Social Hardship' refers to complex multiple priority needs such as being overcrowded and have a medical condition.

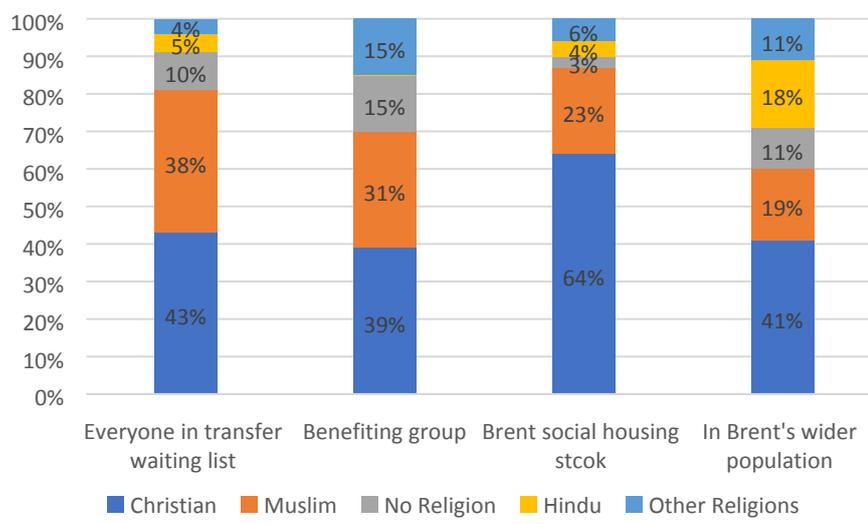
The availability of equality data on each protected characteristics was evaluated. The validity of the analysis on this data was confirmed in the supplied commentary in each section of the protected characteristics.

16. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

<b>AGE</b>																	
<b>Details of impacts identified</b>	<p>The following graph shows strong similarity in proportion of all age groups in both cohorts, the cohort in the transfer waiting list (blue columns) and the benefiting cohort (orange columns).</p> <table border="1"> <caption>Age Group Comparison Data</caption> <thead> <tr> <th>Age Group</th> <th>Everyone in transfer waiting list (%)</th> <th>Benefiting group (%)</th> <th>Winder Brent population (%)</th> </tr> </thead> <tbody> <tr> <td>Aged 20-24</td> <td>1%</td> <td>0%</td> <td>12%</td> </tr> <tr> <td>Aged 25-64</td> <td>73%</td> <td>72%</td> <td>57%</td> </tr> <tr> <td>Aged 65 and over</td> <td>27%</td> <td>28%</td> <td>11%</td> </tr> </tbody> </table> <p>However, when comparing these two cohorts with the age of the wider population in Brent (grey column), the percentage of households aged 65 and over in the transfer waiting list is over a double of that in the Brent's population.</p> <p>The transfer list is overrepresented with older people who were allocated social housing a long time ago and then over time their needs have changed. The needs of these older people tend to be due to under occupying (43%), elderly sheltered accommodation needs (30%) and medical needs (16%).</p>	Age Group	Everyone in transfer waiting list (%)	Benefiting group (%)	Winder Brent population (%)	Aged 20-24	1%	0%	12%	Aged 25-64	73%	72%	57%	Aged 65 and over	27%	28%	11%
Age Group	Everyone in transfer waiting list (%)	Benefiting group (%)	Winder Brent population (%)														
Aged 20-24	1%	0%	12%														
Aged 25-64	73%	72%	57%														
Aged 65 and over	27%	28%	11%														
<b>DISABILITY</b>																	

<b>Details of impacts identified</b>	<p>In households with disability data, 36% of the benefiting households are disabled. Similarly, 35% are disabled in the larger cohort of households in the transfer waiting list.</p> <p>The representation of households with disabilities in both cohorts is almost equal in both cohorts. However, this over double of percentage of disabled people in the Brent population, which is 14.4% again this is because the nature of the transfer list prioritises those with medical needs.</p> <p>Disability data is obtained on 54% of the 267 households that are in the transfer waiting list. Disability data is obtained in 78% of the 18 households that would benefit from the proposal</p>																														
<b>RACE</b>																															
<b>Details of impacts identified</b>	<p>The below graph shows the transfer list compared to the benefiting cohort by ethnicity, households in Brent social housing stock and the wider Brent population.</p>  <table border="1"> <caption>Ethnicity Distribution Data</caption> <thead> <tr> <th>Group</th> <th>Black</th> <th>White</th> <th>Asian</th> <th>Other</th> <th>Mixed</th> </tr> </thead> <tbody> <tr> <td>Everyone in transfer waiting list</td> <td>53%</td> <td>24%</td> <td>11%</td> <td>8%</td> <td>5%</td> </tr> <tr> <td>Benefiting group</td> <td>44%</td> <td>44%</td> <td>6%</td> <td>6%</td> <td>0%</td> </tr> <tr> <td>Brent social housing stock</td> <td>51%</td> <td>35%</td> <td>13%</td> <td>0%</td> <td>0%</td> </tr> <tr> <td>Brent wider population</td> <td>21%</td> <td>35%</td> <td>35%</td> <td>9%</td> <td>0%</td> </tr> </tbody> </table> <p>As shown in the graph above, Asian households are under-represented in both cohorts compared to the wider population in Brent and the households currently in Brent social housing stock. In addition, mixed ethnic backgrounds households are not represented in the benefiting cohort at all.</p> <p>Data on ethnicity is available on 90% of the larger cohort (267 households) in the transfer waiting list. This is 89% in the benefiting cohort (18 households).</p>	Group	Black	White	Asian	Other	Mixed	Everyone in transfer waiting list	53%	24%	11%	8%	5%	Benefiting group	44%	44%	6%	6%	0%	Brent social housing stock	51%	35%	13%	0%	0%	Brent wider population	21%	35%	35%	9%	0%
Group	Black	White	Asian	Other	Mixed																										
Everyone in transfer waiting list	53%	24%	11%	8%	5%																										
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Brent social housing stock	51%	35%	13%	0%	0%																										
Brent wider population	21%	35%	35%	9%	0%																										
<b>SEX</b>																															

<b>Details of impacts identified</b>	<p>The majority (67%) of the 267 households in the transfer waiting list are headed by women. Likewise, the majority (72%) of the 18 households that would benefit from the proposal are also headed by women. Both cohorts share similarity in their gender structure.</p> <p>Households headed by men are under-represented in both the transfer cohort and the benefiting cohort; men make up 50.9% of Brent's population.</p> <p>However, this is expected as due to the criteria through which priority housing need is established under the relevant legislation for example pregnancy and children. Female-headed households make up over half of the council's housing waiting list and those living in council housing.</p>
<b>SEXUAL ORIENTATION</b>	
<b>Details of impacts identified</b>	<p>LGBT households make up 3% of the 267 households in the transfer waiting list. However, 100% of the benefiting cohort are heterosexual with no LGBT households in this cohort. LGBT people make up 5-7% of the population in Brent.</p> <p>Data on households' sexual orientation is available on 76% of households in the transfer waiting list. This is 66% in the 18 households that would benefit from the proposal.</p>
<b>PREGANCY AND MATERNITY</b>	
<b>Details of impacts identified</b>	<p>Of the 267 households in Brent Council's transfer list, 9% have a pregnancy/maternity indicator. This is 6% in the cohort that would benefit from the proposal changes; this is actually just one household.</p> <p>It is important to underline that data on pregnancy/maternity is mostly historical indicators and do not confirm that the pregnancies are current.</p>
<b>RELIGION OR BELIEF</b>	
<b>Details of impacts identified</b>	<p>The below graph shows the religion or belief of the applicants on the transfer list compared to the benefiting cohort, households in Brent's social housing stock and the wider Brent population.</p>



As shown in the graph above, households with no religion or other religion are over-represented in the benefiting group; this is a glitch resulting from the random nature of selecting a small benefiting cohort.

In addition, Hindus are not represented in the benefiting group at all despite being 18% of the Brent population.

The above graph points to a significant difference in the religion characteristics of the households in Brent social housing stock and the wider Brent population. The largest two religion groups, Christians (64%) and Muslims (23%) are over-represented in Brent's social housing stock. Christians in Brent make up 41% of the population and Muslims make up 19%.

Data on religion/belief is stated on 76% of the 267 households in the larger transfer waiting time, this is 72% of the 18 households that would benefit from the proposal.

## GENDER REASSIGNMENT

### Details of impacts identified

There is insufficient data regarding gender reassignment of the 267 households in the transfer waiting list. Subsequently, none of the matched 18 households (out of the 267) had data available on gender reassignment.

The Diversity in Brent document states that 3,400 people in Brent experience gender variance (based on GLA population projections that equates to 1% of the borough population) Source: Stonewall.

We do not however consider there to be any adverse impacts on this group based on gender variance. This is because of the small size of both cohorts in the transfer list and the matched cohort.

**MARRIAGE & CIVIL PARTNERSHIP**
**Details of impacts identified**

There is insufficient data regarding marital status of the households on the transfer list to assess the impact on these groups. We do not however consider there to be any adverse impacts on this group.

17. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No, the proposal to prioritise households who need a transfer to bid for accommodation that becomes available on their current estate upholds the objectives of the Council's Allocations scheme, particularly

- To increase the sustainability of local communities  
This proposal will promote the sustainability of local communities by prioritising those within the estate for any new build property on that estate
- To ensure that the scheme allows the Council and its partner organisation to make best use of homes and in particular adapted properties

This proposal will help the council make best use of homes by matching those with a transfer need to newly built properties on the estate.

18. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes, a number of engagement initiatives were undertaken to gather the views of those affected by the changes to the policy as outlined below. Further engagement is not required.

Formal consultation was launched on 12 November 2018 and ended on 21 January 2019, through an on-line consultation survey. As well as advertising the consultation survey on the Council's website, and on the Locata home page, every household currently on the housing register (including Band D) was notified. Consultation workshops were also held with the following stakeholders;

- Members
- Temporary Accommodation User Forums (attended by approximately 500 households over 5 Forums)
- Registered Providers
- Voluntary Sector
- Adult Social Care
- Children's and Young People Services
- Brent Housing Management

As some of the issues that were being consulted on are fairly technical the purpose of these workshops was to go through each issue in detail and to give people the opportunity to ask questions to clarify what we were asking them to give their opinion on. Attendees were then encouraged to express their opinions via the consultation survey that was made available via the Council's consultation portal.

An independent research company, bmg Research were also commissioned to facilitate 2 workshops on the 12 March 2019. The first workshop was made up of a group of housing professionals and the second made up of a cross section of residents of the borough. The purpose of these workshops was to give people more of an opportunity to debate the implications and express their views of the various proposals and possible impact on households seeking social housing.

19. Please detail any areas identified as requiring further data or detailed analysis.

Data on applicants and households in regards to their protected characteristics, particularly in areas where limited data prevents us drawing any conclusions (as listed below) would help improve our equality analysis.

- Disability
- Sexual orientation
- Gender reassignment
- Religion or belief
- Pregnancy or maternity
- Marriage

The introduction of a new customer portal from April 2018 where homeless applicants can make an application directly and include their demographic information will help to improve data capture in this area.

20. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

Households with pending medical needs and those fleeing violence or hate crime and waiting for a transfer would have less priority, as the priority would be given to households who live on the estate first.

Households feeling violence or hate crime make up 5% of the transfer waiting list, these are mostly females. Households with medical priority needs make up 15% of the transfer waiting list, one-third of these households have a disability.

Because households would be transferred to the same neighbourhood, any local issues on an estate could be perpetuated.

21. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

All allocations of properties made under this proposal will be monitored in line with the Council's Allocation Scheme and statutory reporting requirements to relevant agencies. Operational meetings.

## **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Although the number of households on the transfer waiting list is small, this proposal would positively enable transferees in retaining their local connections, communities and services. For example, children would maintain accessing the same schools and activities. In addition, this would enable older people to continue accessing the same services and community activities.

On the other hand, due to the randomness of the selection process, this proposal could deprive households with legitimately urgent needs to transfer from enhancing their quality of life.

**Age:** Older (aged 65 and over) households are over-represented in the transfer waiting list. Older households make up 27% of the transfer waiting list and 28% of the benefiting cohort. Whereas, this group make up only 12% of Brent's population.

Many of these older households are under-occupiers that the Council is actively working with to help find them suitable accommodation, which would in turn release larger sized properties for overcrowded households in the borough.

**Disability:** The high presence of disabled households in the transfer waiting list is expected as these households seek properties that meet their medical needs. The ability to move to suitable accommodation within their estate would offer a positive impact for this group.

**Race:** Asian households are under-represented in both cohorts compared to the wider population in Brent. In addition, households of mixed ethnic backgrounds are not represented in the benefiting cohort. Due the availability of social housing, the numbers and structure of ethnic groups in the transfer waiting list reflect the presence of established communities with the larger groups represented in line with Brent's population statistics.

The smaller number of available properties for transfer and the random nature of selecting households for the transfer would result in less or no households from the smaller ethnic groups.

**Sex:** Households headed by men are under-represented in both the transfer cohort and the benefiting cohort. However, this is expected as due to the criteria through which priority-housing need is established under the relevant legislation for example pregnancy and children. Female-headed households make up over half of the council's housing waiting list and those living in council housing.

**Sexual orientation:** LGBT households make up only 3% of the transfer waiting list. Moreover, none of the households benefiting from the proposal is LGBT. This is likely to be attributed to the priority given to households with children in the initial stages of allocating social housing in Brent. This is another example where due to the randomness of the selection process, smaller minority groups could miss already limited opportunities.

**Religion:** Households with no religion or other smaller religions are over-represented in the benefiting group. Moreover, Muslim households are over-represented in both cohorts compared to the wider Brent population.

The smaller number of available properties for transfer and the random nature of selecting households for the transfer would result in less or no households from the smaller faith groups.

**SECTION D – RESULT**

<i>Please select one of the following options. Mark with an "X".</i>		
<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	<b>X</b>
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	

**SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>

**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Omari Gayle
<b>REVIEWING OFFICER:</b>	Lavdrim Krashi
<b>HEAD OF SERVICE:</b>	Laurence Coaker

**EQUALITY ANALYSIS (EA)**
**Proposal 4 – Local Lettings Temporary Accommodation**

<b>POLICY/PROPOSAL:</b>	Local Lettings Policy - Give priority to accepted homeless households living in Temporary Accommodation on an estate that is being regenerated, for an allocation of social housing that becomes available on the same estate
<b>DEPARTMENT:</b>	Community Wellbeing
<b>TEAM:</b>	Housing Needs Service
<b>LEAD OFFICER:</b>	Omari Gayle
<b>DATE:</b>	24/04/2019

**SECTION A – INITIAL SCREENING**

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

This proposal is similar to the proposed *Local Lettings Policy - Give priority to households who need a transfer to bid for accommodation that becomes available on their current estate above*, and would give existing households who the Council has accepted the main homelessness duty to and who are living in Temporary Accommodation priority for an offer of social housing on the same estate, if the estate is being regenerated.

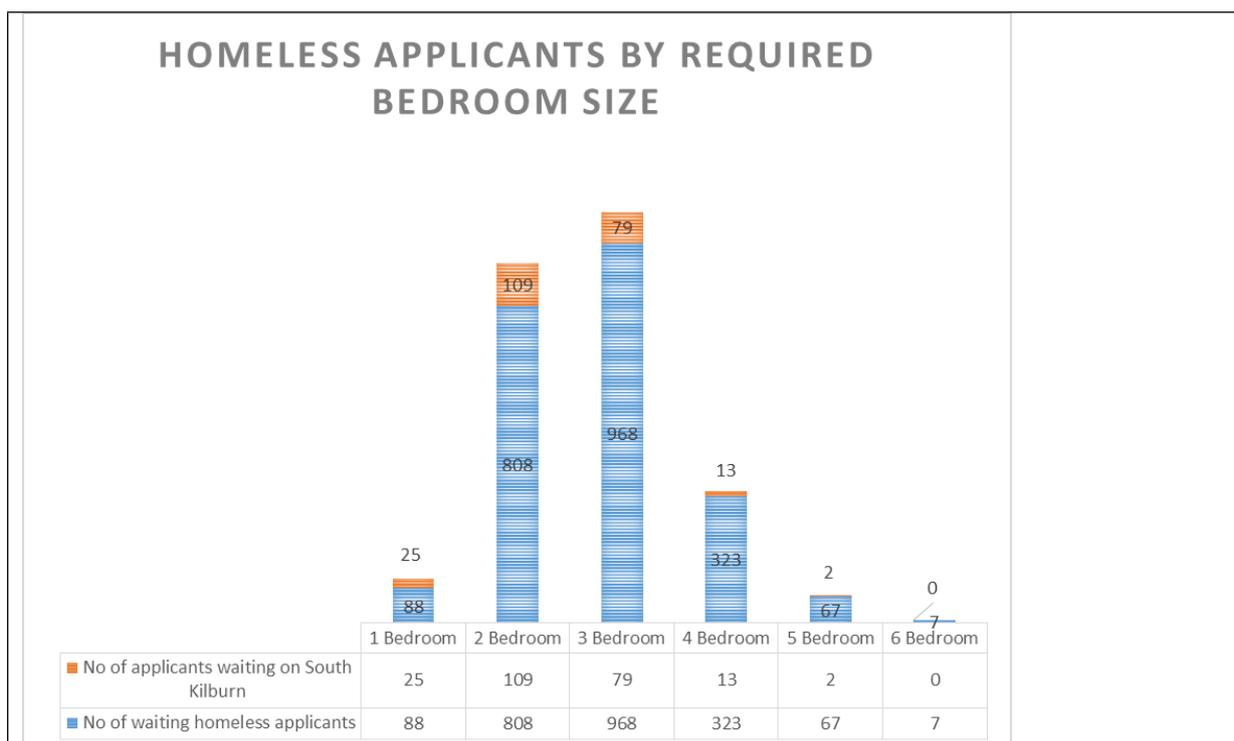
2. Who may be affected by this policy or proposal?

This proposal affects the 2,261 accepted homeless households on the council's waiting list in band C. The majority of these households are waiting in temporary accommodation while others may have made their own arrangements for temporary accommodation for example staying with friends or family. These households are waiting for suitable accommodation to be allocated for them through the council's allocations policy.

Of this group 228 currently, reside on the councils South Kilburn Estate. These applicants make up 10% of the waiting list. By offering this group priority on their estate, they would potentially benefit by accessing social housing much faster than they would have in the general waiting list. This effectively allows them to 'jump the queue'.

In 2017/18, 618 units of social housing were available to be allocated to meet this demand. Of these units, 44% were 1 bed properties, whereas 83% of the demand, in Bands A-C is for family sized accommodation. The limited supply of stock means that households can wait for years in temporary accommodation.

The below graph shows the applicants on the waiting list by bedroom required.



The average waiting time for a household varies depending on their bed size need. The below table shows the average waiting time for each property size and the number of each cohort who have waited longer than this time.

Bedroom Size	Average Waiting Time	No of Homeless applicants meeting the average waiting time	No of South Kilburn applicants meeting the average waiting time
1	2 Years	23	12
2	9 Years	98	9
3	16 Years	127	8
4	20 Years	31	0
5	20 Years	8	0
6	20 Years +	1	0
Total		294	29

On average homeless applicants residing on South Kilburn Estate currently have a waiting time that is lower than their counterparts living in Temporary Accommodation outside of South Kilburn. South Kilburn residents who have waited over the average waiting time have waited on average 9 years for their social housing accommodation, while other homeless applicants who have waited over the average waiting time have waited on average 15.4 years over the average waiting time.

- Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, there is relevance to equality and the council's public sector equality duty as within the cohort of people accessing this service some protected groups are over-represented compared to the borough as a whole.

This is due to the criteria through which priority need is established under the relevant legislation: for example, a household may be regarded as being in priority need owing to age, to a physical disability or mental health condition or to pregnancy. It is also an effect of poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households. Black Africans make up 21% of current accepted homeless households compared to 7.9% in the wider borough.

(Source: 2016 population from GLA)

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	

**If you have answered YES to ANY of the above, then proceed to section B.  
If you have answered NO to ALL of the above, then proceed straight to section D.**

## SECTION B – IMPACTS ANALYSIS

22. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

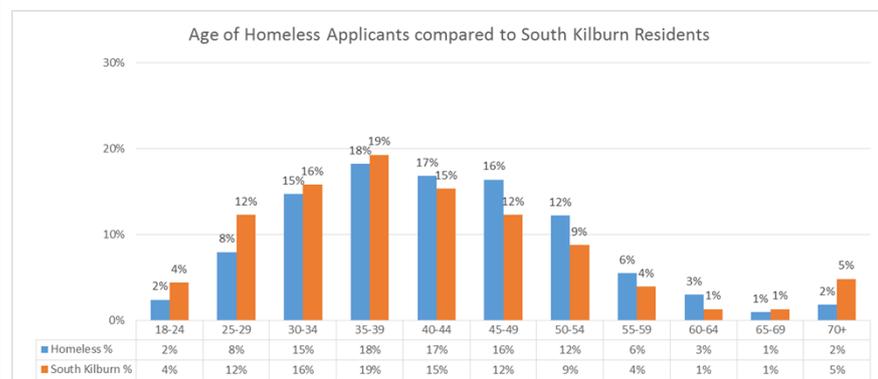
To analyse the impact of this proposal officers have compared the characteristics of the 2,261 accepted homeless households on the council’s waiting list in band C to the 228 households living on the South Kilburn Estate in temporary accommodation.

23. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

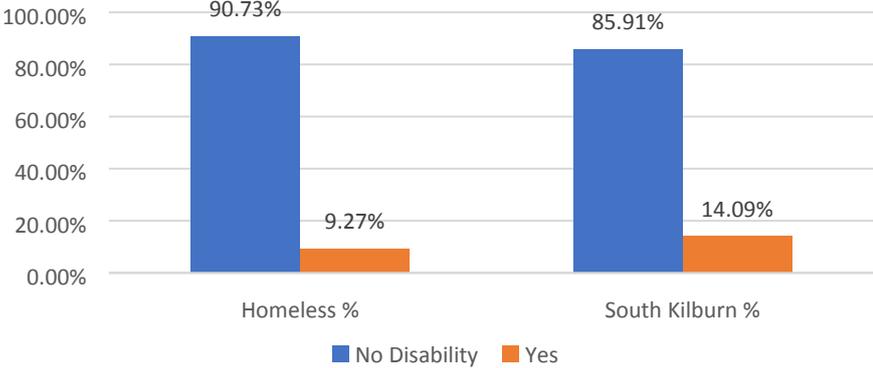
### AGE

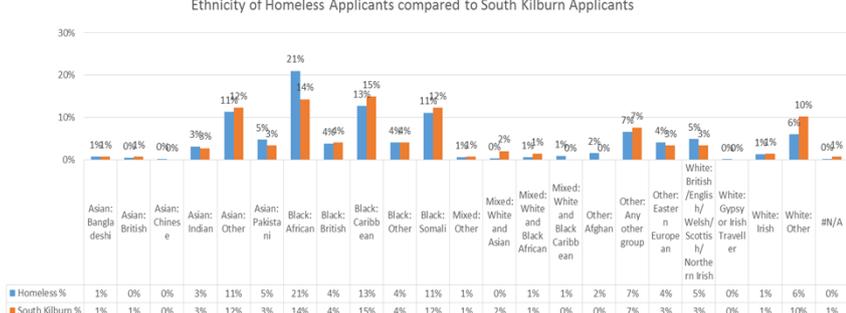
#### Details of impacts identified

The below graph shows the proportion of homeless applicants by age band compared to the age banding of the 228 homeless applicants living on the South Kilburn Estate.



The data shows that those on the South Kilburn Estate are proportionately younger than those on the waiting list as well as those aged 65 and over.

	<p>As those on the South Kilburn Estate have been placed there in the last five years of the regeneration programme, we would anticipate a slightly younger group to be living there, as they are newer to homelessness.</p> <p>This also may be due to the property sizes that have become available on these estates. 10% of those on the South Kilburn estate require a 1 bedroom property, which is a much higher proportion than that of the full waiting list, which is 3%. Therefore, there is a higher proportion of childless households on the South Kilburn estate, which may account for the overrepresentation of younger and older households.</p>									
<b>DISABILITY</b>										
<b>Details of impacts identified</b>	<p>The below graph shows the proportion of homeless applicants who have stated they have a disability compared to the 228 homeless applicants living on the South Kilburn Estate.</p> <div data-bbox="488 853 1402 1400" style="border: 1px solid #ccc; padding: 10px; margin: 10px 0;"> <p style="text-align: center;"><b>Disability of Homeless Applicants compared to South Kilburn Applicants</b></p>  <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 10px;"> <thead> <tr> <th>Group</th> <th>No Disability</th> <th>Yes</th> </tr> </thead> <tbody> <tr> <td>Homeless %</td> <td>90.73%</td> <td>9.27%</td> </tr> <tr> <td>South Kilburn %</td> <td>85.91%</td> <td>14.09%</td> </tr> </tbody> </table> </div> <p>We see similar rates of disability in both cohorts and expect no advantage or disadvantage to those with disabilities based on the introduction of this policy.</p> <p>Disability data is available for 11% of the waiting list and 4% of the South Kilburn cohort.</p>	Group	No Disability	Yes	Homeless %	90.73%	9.27%	South Kilburn %	85.91%	14.09%
Group	No Disability	Yes								
Homeless %	90.73%	9.27%								
South Kilburn %	85.91%	14.09%								
<b>RACE</b>										
<b>Details of impacts identified</b>	<p>The below graph shows the ethnicity of homeless applicants compared to the 228 homeless applicants living on the South Kilburn Estate.</p>									



	Homeless %	South Kilburn %
Asian: Bangladeshi	1%	1%
Asian: British	0%	1%
Asian: Chinese	0%	0%
Asian: Indian	3%	3%
Asian: Other	11%	12%
Asian: Pakistani	5%	3%
Black: African	21%	14%
Black: British	4%	4%
Black: Caribbean	13%	15%
Black: Other	4%	4%
Black: Somali	11%	12%
Mixed: Other	1%	1%
Mixed: White and Asian	0%	2%
Mixed: White and Black African	1%	1%
Mixed: White and Black Caribbean	1%	0%
Other: Afghan	2%	0%
Other: Any other group	7%	7%
Other: European	4%	3%
Other: English/Welsh/Scottish/Northern Irish	5%	3%
White: Gypsy or Irish Traveller	0%	0%
White: Irish	1%	1%
White: Other	6%	10%
#N/A	0%	1%

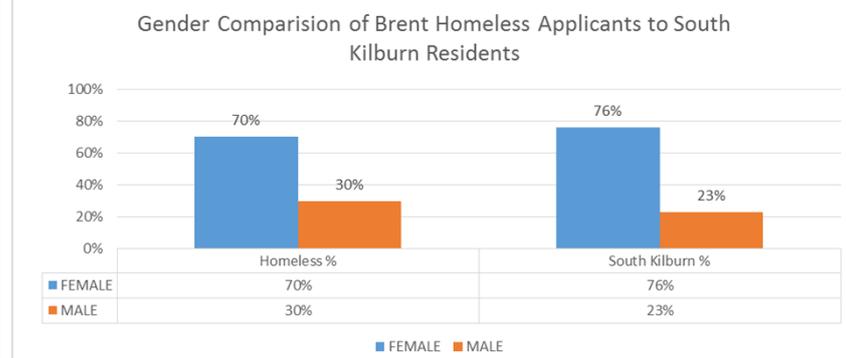
We see similar distribution in the South Kilburn cohort as we do across the all homelessness applicants.

Ethnicity data is available for 77% of the waiting list and 45% of the South Kilburn cohort.

**SEX**

**Details of impacts identified**

The below graph shows the gender of homeless applicants compared to the 228 homeless applicants living on the South Kilburn Estate.



	Homeless %	South Kilburn %
FEMALE	70%	76%
MALE	30%	23%

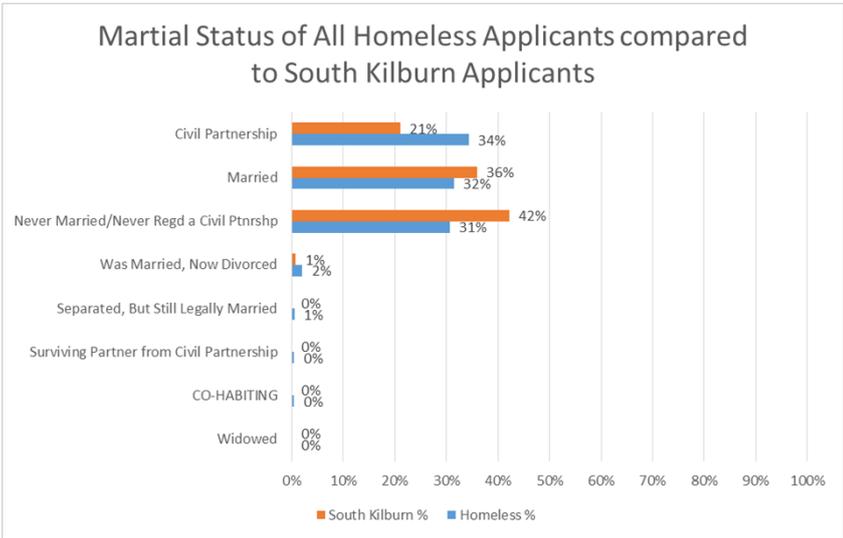
We see similar distribution in the South Kilburn cohort as we do across the all homelessness applicants.

**SEXUAL ORIENTATION**

**Details of impacts identified**

The below graph shows the proportion of homeless applicants by sexual orientation compared to the 228 homeless applicants living on the South Kilburn Estate.

	<p style="text-align: center;"><b>Sexual Orientation of Homeless Applicants compared to South Kilburn Applicants</b></p> <table border="1"> <caption>Sexual Orientation Data</caption> <thead> <tr> <th>Sexual Orientation</th> <th>Homeless %</th> <th>South Kilburn %</th> </tr> </thead> <tbody> <tr> <td>Bisexual</td> <td>0%</td> <td>0%</td> </tr> <tr> <td>Heterosexual</td> <td>89%</td> <td>84%</td> </tr> <tr> <td>Lesbian</td> <td>0%</td> <td>2%</td> </tr> <tr> <td>Other</td> <td>0%</td> <td>4%</td> </tr> <tr> <td>Prefer Not to Say</td> <td>11%</td> <td>11%</td> </tr> </tbody> </table> <p>We see similar reported rates in both groups and therefore do not anticipate any impact based on this protected characteristic.</p> <p>Sexual orientation data is only available for 21% of the waiting list and 15% of the South Kilburn cohort.</p>	Sexual Orientation	Homeless %	South Kilburn %	Bisexual	0%	0%	Heterosexual	89%	84%	Lesbian	0%	2%	Other	0%	4%	Prefer Not to Say	11%	11%
Sexual Orientation	Homeless %	South Kilburn %																	
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Other	0%	4%																	
Prefer Not to Say	11%	11%																	
<b>PREGANCY AND MATERNITY</b>																			
<b>Details of impacts identified</b>	<p>There is insufficient data regarding pregnancy or maternity of the households on the waiting list to assess the impact on these groups.</p> <p>We do not however consider there to be any adverse impacts on any household based on their pregnancy.</p>																		
<b>RELIGION OR BELIEF</b>																			
<b>Details of impacts identified</b>	<p>There is insufficient data regarding religion of the households on the waiting list to assess the impact on these groups.</p> <p>2011 Census data provides us with the following information about religion and belief in the wider borough.</p> <table border="1" data-bbox="488 1559 1393 1809"> <thead> <tr> <th>Religion or belief</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Christianity</td> <td>41%</td> </tr> <tr> <td>Islam</td> <td>19%</td> </tr> <tr> <td>Hinduism</td> <td>18%</td> </tr> <tr> <td>No religion</td> <td>11%</td> </tr> <tr> <td>Judaism</td> <td>1%</td> </tr> <tr> <td>Buddhism</td> <td>1%</td> </tr> </tbody> </table> <p>We do not however consider there to be any adverse impacts on any religious group based on their religion or belief.</p>	Religion or belief	Percentage	Christianity	41%	Islam	19%	Hinduism	18%	No religion	11%	Judaism	1%	Buddhism	1%				
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<b>GENDER REASSIGNMENT</b>																			

<b>Details of impacts identified</b>	<p>There is insufficient data regarding gender reassignment of the applicants accepted as homeless in the last three years to assess the impact on these groups.</p> <p>The Diversity in Brent document states that 3,400 people in Brent experience gender variance (based on GLA population projections that equates to 1% of the borough population) Source: Stonewall.</p> <p>We do not however consider there to be any adverse impacts on this group based on gender variance.</p>																											
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>																												
<b>Details of impacts identified</b>	<p>The below graph shows the proportion of homeless applicants by marital status compared to the 228 homeless applicants living on the South Kilburn Estate.</p> <div data-bbox="488 853 1331 1391" style="text-align: center;">  <table border="1" data-bbox="488 853 1331 1391"> <caption>Marital Status of All Homeless Applicants compared to South Kilburn Applicants</caption> <thead> <tr> <th>Marital Status</th> <th>South Kilburn %</th> <th>Homeless %</th> </tr> </thead> <tbody> <tr> <td>Civil Partnership</td> <td>21%</td> <td>34%</td> </tr> <tr> <td>Married</td> <td>36%</td> <td>32%</td> </tr> <tr> <td>Never Married/Never Regd a Civil Ptnrshp</td> <td>42%</td> <td>31%</td> </tr> <tr> <td>Was Married, Now Divorced</td> <td>1%</td> <td>2%</td> </tr> <tr> <td>Separated, But Still Legally Married</td> <td>0%</td> <td>1%</td> </tr> <tr> <td>Surviving Partner from Civil Partnership</td> <td>0%</td> <td>0%</td> </tr> <tr> <td>CO-HABITING</td> <td>0%</td> <td>0%</td> </tr> <tr> <td>Widowed</td> <td>0%</td> <td>0%</td> </tr> </tbody> </table> </div> <p>We see higher rates of marriage and those never married or in a civil partnership on the South Kilburn estate compared to all homeless applicants while there is a lower rate of those in a civil partnership.</p> <p>As noted in the age section there is a higher proportion of childless households on the South Kilburn estate, which may be due to the property sizes available, this may also contribute to a higher proportion of those never married or in a civil partnership.</p> <p>Marital status information is available for 60% of the waiting list and 56% of the South Kilburn cohort therefore we need to be mindful about drawing conclusions with this data.</p>	Marital Status	South Kilburn %	Homeless %	Civil Partnership	21%	34%	Married	36%	32%	Never Married/Never Regd a Civil Ptnrshp	42%	31%	Was Married, Now Divorced	1%	2%	Separated, But Still Legally Married	0%	1%	Surviving Partner from Civil Partnership	0%	0%	CO-HABITING	0%	0%	Widowed	0%	0%
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Widowed	0%	0%																										

24. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

The proposal to offer those living in temporary accommodation on the South Kilburn estate prioritises some households over others simply by the where they were placed in TA accommodation. We see a higher proportion of households requiring 1 bedroom properties on the South Kilburn Estate and the nature of those requiring a 1 bedroom property means there is a higher proportion of childless households and we therefore see overrepresentation in younger and older households and households that were never married or in a civil partnership compared to the housing waiting list as a whole.

While the South Kilburn group will benefit from this proposal, the additional homes being built through regeneration will be specified based on the demand of the entire waiting list and therefore offer knock on benefit to the entire group.

25. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes, a number of engagement initiatives were undertaken to gather the views of those affected by the changes to the policy as outlined below. Further engagement is not required.

Formal consultation was launched on 12 November 2018 and ended on 21 January 2019, through an on-line consultation survey. As well as advertising the consultation survey on the Council's website, and on the Locata home page, every household currently on the housing register (including Band D) was notified. Consultation workshops were also held with the following stakeholders;

- Members
- Temporary Accommodation User Forums (attended by approximately 500 households over 5 Forums)
- Registered Providers
- Voluntary Sector
- Adult Social Care
- Children's and Young People Services
- Brent Housing Management

As some of the issues that were being consulted on are fairly technical, the purpose of these workshops was to go through each issue in detail and to give people the opportunity to ask questions to clarify what we were asking them to give their opinion on. Attendees were then encouraged to express their opinions via the consultation survey that was made available via the Council's consultation portal.

An independent research company, bmg Research were also commissioned to facilitate 2 workshops on the 12 March 2019. The first workshop was made up of a group of housing professionals and the second made up of a cross section of residents of the borough. The purpose of these workshops was to give people more of an opportunity to debate the implications and express their views of the various proposals and possible impact on households seeking social housing.

26. Please detail any areas identified as requiring further data or detailed analysis.

Data on applicants and households in regards to their protected characteristics, particularly in areas where limited data prevents us drawing any conclusions (as listed below) would help improve our equality analysis.

- Sexual orientation

- Gender reassignment
- Religion or belief
- Pregnancy or maternity
- Marriage

The introduction of a new customer portal from April 2018 where homeless applicants can make an application directly and include their demographic information will help to improve data capture in this area.

27. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

The Council knows that a lot of the households in TA on South Kilburn have been waiting less time for social housing than households in other parts of the borough, but under this change, they would get priority access to the new social houses on South Kilburn. However, it should also be noted that without this change it is unlikely that the South Kilburn regeneration would go ahead, and therefore, these additional homes would not be built.

28. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

All allocations of properties made under this proposal will be monitored in line with the Council's Allocation Scheme and statutory reporting requirements to relevant agencies. Operational meetings.

## **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Those positively impacted by this proposal are those who are on the council's waiting list and given temporary accommodation in South Kilburn Estate. As they will be prioritised for a property on the regenerated South Kilburn estate when it becomes available. This gives them an advantage over those who may have been waiting on the waiting list longer but were not given temporary accommodation on South Kilburn estate, effectively allowing them to 'jump the queue'.

It is accepted that this proposal gives an unfair advantage to those households placed in South Kilburn temporary accommodation however as the GLA has changed rules regarding regeneration on estates it is now important that those tenants have a say and a stake in the regeneration on the SK estate.

The regeneration of the South Kilburn estate is aiming to maximise housing on the land and therefore will bring in more supply to meet homelessness demand for the Council.

We can see from the comparative demographic data that no group is advantaged or disadvantaged in this proposal by their protected characteristics.

**SECTION D – RESULT**

<i>Please select one of the following options. Mark with an “X”.</i>		
<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	<b>X</b>
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	

**SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>

**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Omari Gayle	
<b>REVIEWING OFFICER:</b>	Lavdrim Krashi	
<b>HEAD OF SERVICE:</b>	Laurence Coaker	

**EQUALITY ANALYSIS (EA)**

Proposal 5 – Quota System Review

<b>POLICY/PROPOSAL:</b>	Quota system review
<b>DEPARTMENT:</b>	Community Wellbeing
<b>TEAM:</b>	Housing Needs
<b>LEAD OFFICER:</b>	Omari Gayle
<b>DATE:</b>	24/04/2019

**SECTION A – INITIAL SCREENING**

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Under the current Allocation Scheme, quotas exist enabling services to have direct access to social housing for the cohort of households the quota has been arranged for as set out below.

- **Children Leaving Care** - Young people referred by Brent Children and Young People service who are unable to make alternative arrangements.
- **Probation Service** - Applicants nominated to Brent Council by the Probation Service to avoid the risk of reoffending and where housing is a particular issue as judged by the Probation Service in Brent.
- **Children Services** - Existing tenants and non-tenants referred by Brent Social Services where accommodation is needed on grounds of children's welfare e.g. child protection cases.
- **Adult Social Care** - To release supported housing and approved for independent living by Brent Social Services and The Housing Department.
- **Voluntary Sector** – To release supported housing but not known to Adult Social Care, and approved for independent living by Brent Housing Needs.

This amendment is proposing that we abolish the quota system for the cohorts listed above and instead consider referrals on a case by case referral from the service.

In 2015, the Brent Cabinet agreed to use the powers under the Localism Act to break the link between homelessness and social housing under Part 7 of the Housing Act 1996. However, the quota system, which offers direct access to social housing, does not align with this. By abolishing the quota system, we can ensure the allocation of social housing is based on fair and equitable criteria to all.

2. Who may be affected by this policy or proposal?

The proposal affects individuals who have access to these quotas based on the services they are currently engaged with. The below table shows the agreed quotas per annum for each service. There are 50 social housing properties allocated for the quota system per annum.

<b>Service</b>	<b>Children Leaving Care</b>	<b>Probation Service</b>	<b>Children's Services</b>	<b>Adult Social Care</b>	<b>Voluntary Sector</b>	<b>Total</b>
Quota per annum	30	5	5	5	5	50

The table below shows the number of allocations of social housing made under the quota system in the last three years. Individuals supported by these quotas require one-bedroom properties and, where supply has been available; more allocations through these quotas have been accepted.

<b>Year</b>	<b>Children Leaving Care</b>	<b>Probation Service</b>	<b>Children's Services</b>	<b>Adult Social Care</b>	<b>Voluntary Sector</b>	<b>Total</b>
2015/16	40	2	0	2	9	<b>53</b>
2016/17	39	0	0	4	10	<b>53</b>
2018/19	42	2	0	0	5	<b>49</b>
<b>Total</b>	<b>121</b>	<b>4</b>	<b>0</b>	<b>6</b>	<b>24</b>	<b>155</b>

Allocations to care leavers make up 78% of the 155 allocations under the quota in the last three years. The remaining 22% of allocations under the quota system in the last three years has been to applicants accessing services in the Voluntary Sector (15%), adult social care (4%) and probation services (3%).

Those who may be impacted by this proposal are those households who are currently accessing services that enable them to access these quotas.

There are currently 300 children in care in Brent to whom Brent Council has a corporate parent responsibility. Brent Council has a duty to support care leavers into suitable accommodation once they are ready to live independently.

There are currently 524 individuals living in housing related support through the Voluntary Sector. This type of housing is seen as a pathway to achieve independent living with the aim of securing suitable accommodation for the individual within two years.

There are currently 256 individuals living in supported living schemes and 206 in extra care schemes managed by Adult Social Care services. These are individuals with very high needs and independent living is not always an option of them.

Allocations through the Probation Services and Children's Services quotas have been limited in the last three years. Demand is based on exceptional circumstances and so we cannot quantify those immediately impacted by this proposal.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, there is relevance to equality and the council's public sector equality duty as within the cohort of people referred through the quota system some protected groups are over-represented compared to the borough as a whole.

79% of applicants referred through quota system in the last three years (excluding care leavers) were identified as having a physical or mental health disability compared to 14.4% of Brent's population who say their day-to-day activities are limited.

4. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age		X	
Sex		X	
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an "X".

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
<b>If you have answered YES to ANY of the above, then proceed to section B.</b> <b>If you have answered NO to ALL of the above, then proceed straight to section D.</b>		



**SECTION B – IMPACTS ANALYSIS**

29. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

To evaluate the impact of this proposal we have evaluated the groups of individuals currently accessing services these five quotas have been arranged for, the demand from the group, the way they access housing allocations and their likelihood to be impacted by this proposal.

Children Leaving Care

Children leaving care make up the largest proportion of those accessing social housing through the quota system. While this proposal recommends abolishing all existing quotas, it recommends a new protocol be established with the Children and Young People (CYP) service to establish a Service Level Agreement guaranteeing access to Social Housing for care leavers, along with a shared CYP/Housing Allocation Panel.

This recommendation is made on the basis that the Council has a Corporate Parent responsibility to care leavers and removal of direct access to social housing for this cohort may impact negatively on young people's long-term stability and mental health. Therefore, analysis of Care Leavers has been excluded from this report.

Voluntary Sector

Individuals accessing housing related support through the voluntary sector are the second biggest beneficiaries of the quota system as social housing is one avenue to achieve independent living for this group.

The 524 individuals accessing housing related support come from the following client groups:

<b>Client group</b>	<b>Number</b>	<b>Percentage</b>
Mental Health	155	30%
Single Homeless	120	23%
Multiple Needs	89	17%
Ex-Offenders	20	4%
Learning Disabilities, Physical Disabilities, Sensory Impairment	51	10%
Young people 18-25	45	9%
Teenage Mums	19	4%
Domestic Violence	19	4%
Complex Needs - Women	6	1%
<b>Total</b>	<b>524</b>	<b>100%</b>

Access to suitable housing is an important outcome for this group and over the last three years, 24 households have been allocated social housing through this scheme.

Adult Social Care

The 462 individuals accessing supported housing and extra care have the following primary support reasons.

<b>Primary Support Reason</b>	<b>Number</b>	<b>Percentage</b>
Physical Support	187	40%
Learning Disability Support	148	32%
Mental Health Support	102	22%
Support with memory and cognition	22	5%
Other	3	1%
<b>Total</b>	<b>462</b>	<b>100%</b>

There has been low demand from this service over the last three years with just 6 households accessing housing through the quota system. These are individuals with very high needs and independent living is not always an option of them.

#### Probation & Children's Services

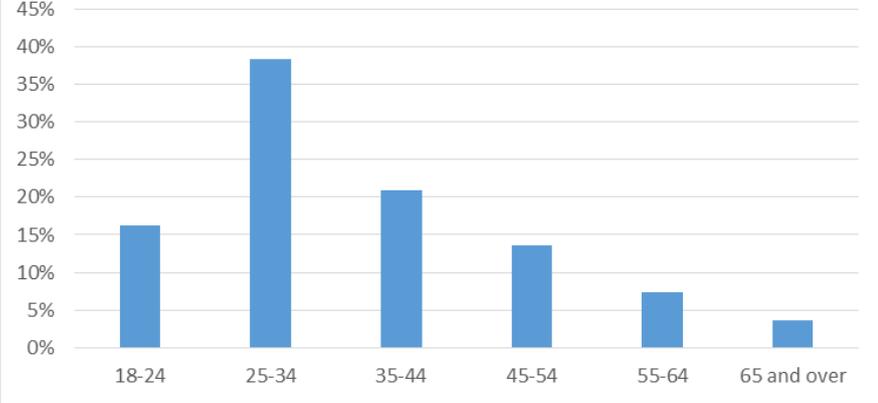
Demand for these quotas is based on referrals in exceptional circumstances and so we cannot quantify those immediately impacted by this proposal. We have analysed the protected characteristics of the four individuals allocated social housing through the Probation Services quota in the last three years. There were no allocations through Children's Services in the last three years.

Evaluation of the five groups identified that the key group that will be impacted by this proposal is those accessing housing related support through the voluntary sector. These are the individuals that our analysis will focus on.

We have also analysed the protected characteristics of the individuals who have been housed through the quota system in the last three years through each quota. However, we are mindful that this group is small and may not be representative of future demand.

30. For each "protected characteristic" provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state "not applicable".

<b>AGE</b>	
<b>Details of impacts identified</b>	The below graph shows the age banding for households accessing housing related support. Data on age is available for 86% of households.

	<p style="text-align: center;"><b>Age banding of households accessing housing related support</b></p>  <p>Households accessing housing related support are overall a younger cohort than the Brent population. 11% of people in the borough are 65 and over while only 4% (11) of those in supported accommodation are.</p> <p>Of those housed through the quota system in the last three years, none have been aged 65 and over. The below table shows the age banding distribution of those housed through the quota system. We see similar age distribution coming through each of the three quota streams: Adult Social Care, Voluntary Sector and Probation services.</p> <table border="1" data-bbox="491 1209 877 1496"> <thead> <tr> <th>Age banding</th> <th>% applicants</th> </tr> </thead> <tbody> <tr> <td>16-24</td> <td>3%</td> </tr> <tr> <td>25-34</td> <td>21%</td> </tr> <tr> <td>35-44</td> <td>26%</td> </tr> <tr> <td>45-54</td> <td>26%</td> </tr> <tr> <td>55-64</td> <td>24%</td> </tr> <tr> <td><b>Total</b></td> <td><b>100%</b></td> </tr> </tbody> </table> <p>This is because individuals over 60 are able to access sheltered accommodation and tend to be placed here to meet their needs.</p>	Age banding	% applicants	16-24	3%	25-34	21%	35-44	26%	45-54	26%	55-64	24%	<b>Total</b>	<b>100%</b>
Age banding	% applicants														
16-24	3%														
25-34	21%														
35-44	26%														
45-54	26%														
55-64	24%														
<b>Total</b>	<b>100%</b>														
<b>DISABILITY</b>															
<b>Details of impacts identified</b>	<p>Disability information on individuals in housing related support is not available from the services.</p> <p>However, we can see through client group data above that 11% of those accessing housing related support are accessing this based on Learning Disabilities, Physical Disabilities or Sensory Impairment.</p>														

Officers do believe the proportion of those with disabilities will be higher than this; however, it is not the primary reason that they are accessing services.

Data shows the majority of applicants (79%) who have been placed through the quota system in the last three years have a physical or mental disability. This is 83% of those referred through adult social care and the voluntary sector and 50% of those referred through probation services.

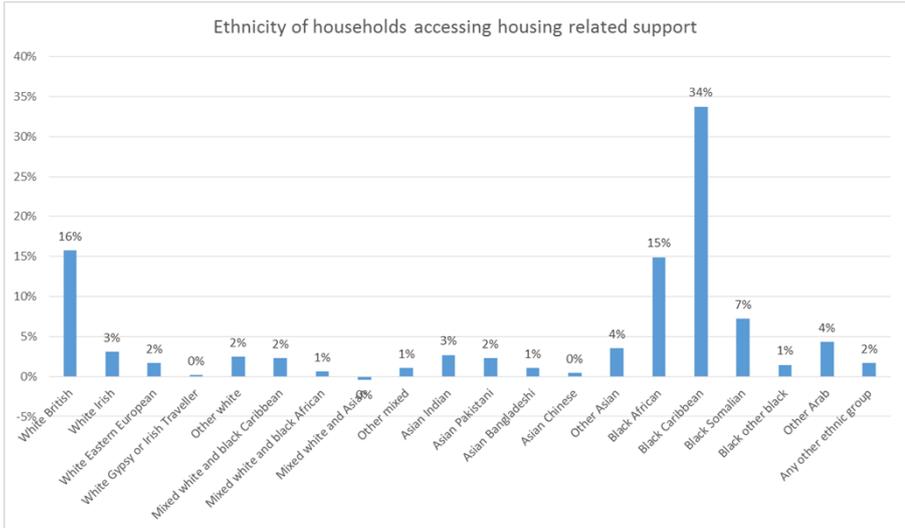
We see a high proportion of households with disability or vulnerability indicators placed through the quota system. The proposal to remove the quotas means that assessment of housing priority of these individuals will be carried out on a case-by-case basis. In line with the council’s commitment to equality of access, those with a disability who have an information or communication (e.g. hearing impairment or learning disability) are offered support to navigate the housing application process.

Housing legislation states that priority need should be given to “a person who is vulnerable as a result of old age, mental illness or handicap or physical disability or other special reason, or with whom such a person resides or might reasonably be expected to reside” (Source: Housing Act 1996, Section 189). Therefore, we do not anticipate any impact based on disabilities.

**RACE**

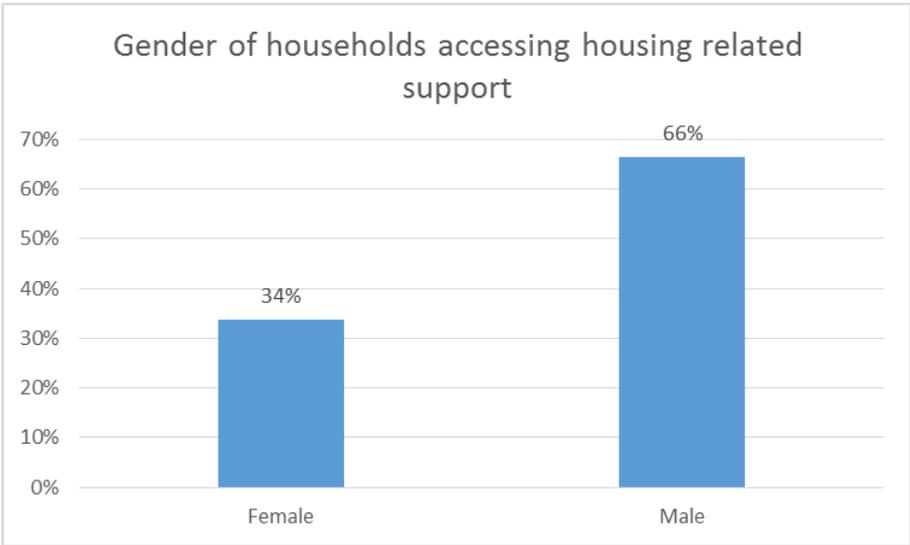
**Details of impacts identified**

The below graph shows the ethnicity for households accessing housing related support. Data on ethnicity is available for 100% of households.



Ethnicity	Percentage
White British	16%
White Irish	3%
White Eastern European	2%
White Gypsy or Irish Traveller	0%
Other white	2%
Mixed white and black Caribbean	2%
Mixed white and black African	1%
Mixed white and Asian	0%
Other mixed	1%
Asian Indian	3%
Asian Pakistani	2%
Asian Bangladeshi	1%
Asian Chinese	0%
Other Asian	4%
Black African	15%
Black Caribbean	34%
Black Somali	7%
Black other black	1%
Other Arab	4%
Any other ethnic group	2%

The data shows that an over-representation of Black households accessing housing related support at 54%, whereas 21% of the Brent

	<p>population is identified as black. Black Caribbean's make up 31% of those accessing housing related support.</p> <p>We see a similar distribution of ethnicity among applicants housed through the quota system in the last three years. 32% of these households were Black Caribbean, 21% were White British.</p> <p>Black African and Caribbean households are also over-represented on the housing waiting list and this is likely to be due to deprivation levels among these communities in the borough.</p>						
<b>SEX</b>							
<b>Details of impacts identified</b>	<p>The below graph shows the gender of households accessing housing related support. Data on gender is available for 83% of applicants.</p> <div data-bbox="488 819 1398 1364" data-label="Figure">  <table border="1"> <caption>Gender of households accessing housing related support</caption> <thead> <tr> <th>Gender</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>34%</td> </tr> <tr> <td>Male</td> <td>66%</td> </tr> </tbody> </table> </div> <p>The housing related support data shows much higher rates of males accessing these services.</p> <p>Males also make up 76% of those housed through the quota system in the last three years.</p> <p>We see higher rates of men in housing related support services due to the client groups these services support for example ex-offenders and homelessness services. Nationally males make up 95% of the prison population. (Source: Ministry of Justice Prison, Population Statistics 06 April 2019) and therefore higher rates accessing support services after leaving prison. There is also a higher proportion of males sleeping rough 84% of the national population (Source: MHCLG, Rough Sleeping Statistics Autumn 2018)</p> <p>Anecdotally, officers comment that males tend to access housing related support services due to a breakdown in a relationship, as they will be the ones to leave the family home while women tend to stay with children.</p>	Gender	Percentage	Female	34%	Male	66%
Gender	Percentage						
Female	34%						
Male	66%						

	<p>Women are more likely to access statutory homelessness support as “a person with whom dependent children reside or might reasonably be expected to reside” places them in priority need for accommodation. (Source: Housing Act 1996, Section 189)</p> <p>9% of the clients accessing supported accommodation services are accessing women’s only services for example teenage mums and domestic abuse refuges.</p>								
<b>SEXUAL ORIENTATION</b>									
<b>Details of impacts identified</b>	<p>There is insufficient data regarding sexual orientation of applicants accessing housing related support or those housed through the quota system in the last three years to assess the impact on these groups.</p> <p>Although we do know that LGBTQI people make up between 5 and 7% of the UK population and between 4-6% of Brent’s. (Source: Stonewall and GLA for population projection)</p> <p>We do not however, consider there to be any adverse impacts on this group.</p>								
<b>PREGANCY AND MATERNITY</b>									
<b>Details of impacts identified</b>	<p>Pregnancy and maternity information on the group accessing housing related support can be derived from the type of supported accommodation they are accessing.</p> <p>4% of those in supported accommodation have accessed it, as they are teenage mums.</p> <p>Those with children or expecting a child are given priority need under homelessness legislation and therefore access to housing support will be available to them through these channels when they are ready to access it.</p> <p>“A person with whom dependent children reside or might reasonably be expected to reside” places them in priority need for accommodation. (Source: Housing Act 1996, Section 189)</p>								
<b>RELIGION OR BELIEF</b>									
<b>Details of impacts identified</b>	<p>There is insufficient data regarding religion of the applicants accessing housing related support or those housed through the quota system in the last three years to assess the impact on these groups.</p> <p>2011 Census data provides us with the following information about religion and belief in the wider borough.</p> <table border="1" data-bbox="488 1888 1393 2029"> <thead> <tr> <th>Religion or belief</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Christianity</td> <td>41%</td> </tr> <tr> <td>Islam</td> <td>19%</td> </tr> <tr> <td>Hinduism</td> <td>18%</td> </tr> </tbody> </table>	Religion or belief	Percentage	Christianity	41%	Islam	19%	Hinduism	18%
Religion or belief	Percentage								
Christianity	41%								
Islam	19%								
Hinduism	18%								

	<table border="1"> <tr> <td>No religion</td> <td>11%</td> </tr> <tr> <td>Judaism</td> <td>1%</td> </tr> <tr> <td>Buddhism</td> <td>1%</td> </tr> </table> <p>We do not however consider there to be any adverse impacts on any religious group based on their religion or belief.</p>	No religion	11%	Judaism	1%	Buddhism	1%
No religion	11%						
Judaism	1%						
Buddhism	1%						
<b>GENDER REASSIGNMENT</b>							
<b>Details of impacts identified</b>	<p>There is insufficient data regarding gender reassignment of the applicants accessing housing related support or those housed through the quota system in the last three years to assess the impact on these groups.</p> <p>The Diversity in Brent document states that 3,400 people in Brent experience gender variance (based on GLA population projections, which equates to 1% of the borough population) Source: Stonewall.</p> <p>We do not however consider there to be any adverse impacts on this group based on gender variance.</p>						
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>							
<b>Details of impacts identified</b>	<p>There is insufficient data regarding marital status of the applicants accessing housing related support or those housed through the quota system in the last three years to assess the impact on these groups.</p> <p>However, anecdotally officers are aware that the majority of those in supported accommodation are single with many client groups accessing supported housing due to relationship breakdown. As we see from the data, they also tend to be younger and therefore may not have entered a marriage or civil partnership yet.</p> <p>We do not consider there to be any adverse impacts on this group.</p>						

31. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No, the proposed to abolish the quota system and replace with case-by-case referrals from the service enhances the Public Sector Equality Duty. The new process for review is needs based and aims to eliminate discrimination by ensuring that housing is allocated on the basis of clear criteria.

It advances equality of opportunity in the way that it is a fair and transparent means of allocating homes, recognising that some households require housing more urgently than others, as their needs are greater.

It also ensures all allocation of housing is assessed on the basis of the same set of criteria. This will assist in ensuring that unfair perceptions about the allocation of social housing among both users of the system and residents in general are addressed.

32. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes, a number of engagement initiatives were undertaken to gather the views of those affected by the changes to the policy as outlined below. Further engagement is not required.

Formal consultation was launched on 12 November 2018 and ended on 21 January 2019, through an on-line consultation survey. As well as advertising the consultation survey on the Council's website, and on the Locata home page, every household currently on the housing register (including Band D) was notified. Consultation workshops were also held with the following stakeholders;

- Members
- Temporary Accommodation User Forums (attended by approximately 500 households over 5 Forums)
- Registered Providers
- Voluntary Sector
- Adult Social Care
- Children's and Young People Services
- Brent Housing Management

As some of the issues that were being consulted on are fairly technical the purpose of these workshops was to go through each issue in detail and to give people the opportunity to ask questions to clarify what we were asking them to give their opinion on. Attendees were then encouraged to express their opinions via the consultation survey that was made available via the Council's consultation portal.

An independent research company, bmg Research were also commissioned to facilitate 2 workshops on the 12 March 2019. The first workshop was made up of a group of housing professionals and the second made up of a cross section of residents of the borough. The purpose of these workshops was to give people more of an opportunity to debate the implications and express their views of the various proposals and possible impact on households seeking social housing.

33. Please detail any areas identified as requiring further data or detailed analysis.

Data on applicants and households in regards to their protected characteristics, particularly in areas where limited data prevents us drawing any conclusions (as listed below) would help improve our equality analysis.

- Disability
- Sexual orientation
- Gender reassignment
- Religion or belief
- Pregnancy or maternity
- Marriage

Referrals from services will require a full housing application from homeless applicants or their support workers directly and requires all demographic information on an applicant, coming through this process will help to improve data capture in this area.

34. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

We do not anticipate any negative impacts on individuals due to this proposal.

The allocation of social housing is assessed on the basis of the same set of criteria set out in the Allocation Scheme. It is a fair and transparent means of allocating homes, recognising that some households require housing more urgently than others, as their needs are greater.

35. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

All allocations of properties made under this proposal will be monitored in line with the Council's Allocation Scheme and statutory reporting requirements to relevant agencies. Operational meetings.

### SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The quota referral system is based on an area of inequality in the council. Those accessing services from which quota referrals are accepted are often the most vulnerable in society and certain protected characteristics are therefore overrepresented within this group.

However, the quota system offers direct access to social housing when referred through the quota system, which does not align with other principals of the Council's Allocations scheme. Therefore, by abolishing these quotas it ensures all allocation of housing is assessed on the basis of the same set of criteria set out in the Allocation Scheme. It is a fair and transparent means of allocating homes, recognising that some households require housing more urgently than others, as their needs are greater.

### SECTION D – RESULT

<i>Please select one of the following options. Mark with an "X".</i>		
<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	<b>X</b>
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	

**SECTION E - ACTION PLAN**

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Omari Gayle
<b>REVIEWING OFFICER:</b>	Lavdrim Krashi
<b>HEAD OF SERVICE:</b>	Laurence Coaker

**EQUALITY ANALYSIS (EA)**
**Proposal 6 – Prioritise Unaffordability**

<b>POLICY/PROPOSAL:</b>	Give priority to households living in unaffordable accommodation
<b>DEPARTMENT:</b>	Community Wellbeing
<b>TEAM:</b>	Housing Needs Service
<b>LEAD OFFICER:</b>	Omari Gayle
<b>DATE:</b>	24/04/2019

**SECTION A – INITIAL SCREENING**

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The shortage of supply of both social housing and affordable private rented accommodation in Brent continues to lead to high demand on the Housing Needs Service, and is the major issue that is driving homelessness demand. Due to the gap between the LHA rate and the market rate for private sector accommodation in Brent, the majority of households who are on low incomes or dependent on benefits find it difficult to find affordable accommodation in the private rented sector in Brent. If they do not have a recognised priority as set out in the current Allocation Scheme, they will not be eligible to bid for social housing.

2. Who may be affected by this policy or proposal?

The aim of this proposal is to offer access to affordable housing for households who may be struggling to afford rent in private sector. Therefore, households who are solely dependent on benefits, with rental income higher than the LHA rate would be positively impacted by this proposal.

The introduction of this proposal could disadvantage households in the current band D and non-priority need.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, there is relevance to equality and the council's public sector equality duty as within the cohort of people accessing this service some protected groups are over-represented compared to the borough as a whole.

This is due to the criteria through which priority need is established under the relevant legislation: for example, a household may be regarded as being in priority need owing to age, to a physical disability or mental health condition or to pregnancy. It is also an effect of

poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households. Black Africans make up 21% of current accepted homeless households compared to 7.9% in the wider borough.

(Source: 2016 population from GLA)

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	X		X
Sex	X		X
Race		X	
Disability		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
<b>If you have answered YES to ANY of the above, then proceed to section B.            If you have answered NO to ALL of the above, then proceed straight to section D.</b>		



**SECTION B – IMPACTS ANALYSIS**

36. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

To assess the impacts of this proposal we have gathered from housing benefit assessors on those who are likely to be wholly dependant on benefits and paying a shortfall to their rent.

We have excluded any shortfall occurring due to non-dependant deductions from the data supplied to make this assessment. Non-dependant deductions have been excluded as shortfall due to non-dependants is deemed as an apportionment of rent due to be paid by the non-dependant.

The below table shows tenure types of claimants. We have focussed only on claimants currently in tenures types of LHA and ODRT, as these are the households leasing in the private sector. All other claimants are in temporary accommodation or some form of social housing.

Tenure Code	Tenure Description
HA	Housing Association
HLA	Homeless person in licensed accommodation
LHA	Local Housing Allowance – Private leases
NDRT	PT New Deregulated Tenancies – Temporary accommodation tenancies now superseded by LHA tenancies
ODT	Oct Deregulated Tenancy – Now superseded by LHA tenancies

The below are the benefits we have included in the assessment:

- DLA Care Comp Higher NOTE AWARDS SDP
- DLA Care Comp Lower WARNING NO SDP
- DLA Care Middle Note Awards SDP
- DLA Mobility Comp Check Care for SDP
- ESA Main Phase Income Related
- Incapacity Ben Long Term rate
- Incapacity Ben Lower Rate
- Job Seekers All Income Based
- JSA Contribution Based
- PIP Daily Living Enhanced
- PIP Daily Living Standard

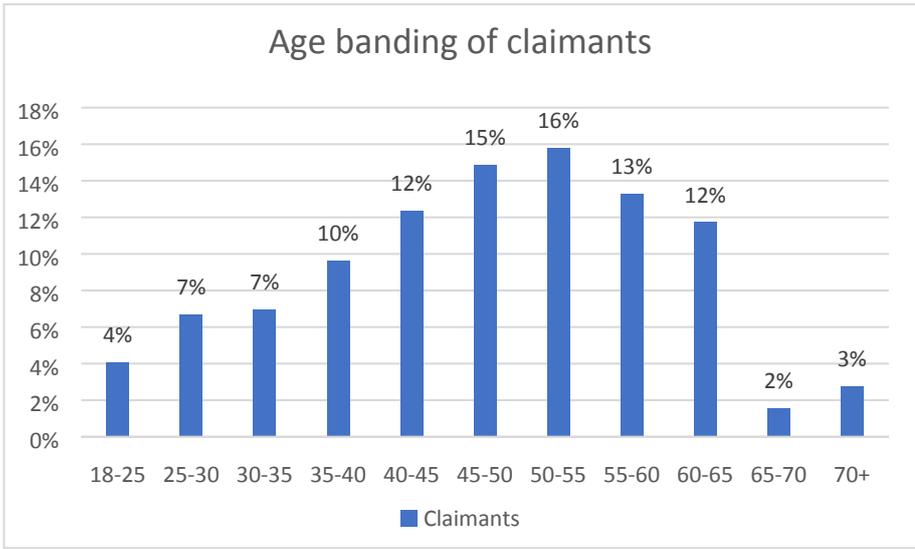
Note these were selected only after we identified the group paying a shortfall in rent, other benefits may be applicable however were not present in this group.

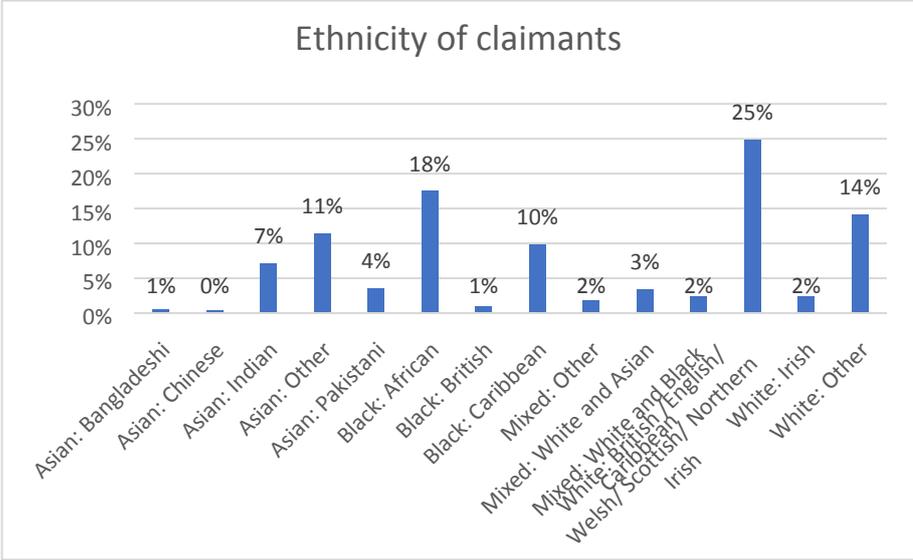
The below table shows the number and percentage of current claimants based on the amount of shortfall they are paying per week.

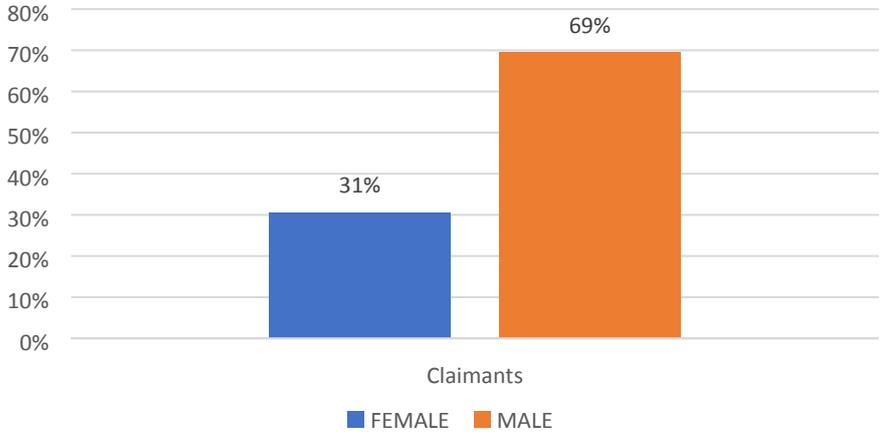
Shortfall banding	Claimants	%
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Under £5	98	9%
£5 - £49.99	691	60%
£50 - £99.99	270	23%
over £100	92	8%
<b>Total</b>	<b>1,151</b>	<b>100%</b>

37. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

<b>AGE</b>																									
<b>Details of impacts identified</b>	<p>The below graph shows the claimants potentially impacted by age band.</p> <div style="text-align: center;">  <table border="1"> <caption>Age banding of claimants</caption> <thead> <tr> <th>Age Band</th> <th>Percentage of Claimants</th> </tr> </thead> <tbody> <tr><td>18-25</td><td>4%</td></tr> <tr><td>25-30</td><td>7%</td></tr> <tr><td>30-35</td><td>7%</td></tr> <tr><td>35-40</td><td>10%</td></tr> <tr><td>40-45</td><td>12%</td></tr> <tr><td>45-50</td><td>15%</td></tr> <tr><td>50-55</td><td>16%</td></tr> <tr><td>55-60</td><td>13%</td></tr> <tr><td>60-65</td><td>12%</td></tr> <tr><td>65-70</td><td>2%</td></tr> <tr><td>70+</td><td>3%</td></tr> </tbody> </table> </div> <p>The graphs shows that claimants within this cohort tend to be within the 25-64 age range with younger and older groups under represented compared to Brent population data. 11% of the overall population of Brent is 65 and over while only 5% of this group are 65+. 12% of the overall population of Brent are aged 16-24 while only 4% of this group are under 25.</p> <p>If this proposal is introduced, we should consider offering it to a wider group of claimants for example those receiving a pension benefit, to enable a wider age group to benefit.</p>	Age Band	Percentage of Claimants	18-25	4%	25-30	7%	30-35	7%	35-40	10%	40-45	12%	45-50	15%	50-55	16%	55-60	13%	60-65	12%	65-70	2%	70+	3%
Age Band	Percentage of Claimants																								
18-25	4%																								
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40-45	12%																								
45-50	15%																								
50-55	16%																								
55-60	13%																								
60-65	12%																								
65-70	2%																								
70+	3%																								

<b>DISABILITY</b>																																	
<b>Details of impacts identified</b>	<p>Data available shows 7% of claimants are identified as disabled, a lower proportion than those in the Brent population of 14%.</p> <p>Data available shows only those identified as disabled. Therefore we are not able to distinguish between those claimants who have identified as not disabled and those where this data is unknown.</p>																																
<b>RACE</b>																																	
<b>Details of impacts identified</b>	<p>The below graph shows the claimants potentially impacted by ethnicity.</p> <div style="text-align: center;">  <table border="1"> <caption>Ethnicity of claimants</caption> <thead> <tr> <th>Ethnicity</th> <th>Percentage</th> </tr> </thead> <tbody> <tr><td>Asian: Bangladeshi</td><td>1%</td></tr> <tr><td>Asian: Chinese</td><td>0%</td></tr> <tr><td>Asian: Indian</td><td>7%</td></tr> <tr><td>Asian: Other</td><td>11%</td></tr> <tr><td>Asian: Pakistani</td><td>4%</td></tr> <tr><td>Black: African</td><td>18%</td></tr> <tr><td>Black: British</td><td>1%</td></tr> <tr><td>Black: Caribbean</td><td>10%</td></tr> <tr><td>Mixed: Other</td><td>2%</td></tr> <tr><td>Mixed: White and Asian</td><td>3%</td></tr> <tr><td>Mixed: White and Black</td><td>2%</td></tr> <tr><td>White: British</td><td>25%</td></tr> <tr><td>White: English/Scottish/Irish</td><td>2%</td></tr> <tr><td>White: Irish</td><td>2%</td></tr> <tr><td>White: Other</td><td>14%</td></tr> </tbody> </table> </div> <p>Black and white ethnicities are over represented in this group while Asian ethnicities are underrepresented compared to the Brent population.</p> <p>Ethnicity information is unknown for 40% of this group.</p>	Ethnicity	Percentage	Asian: Bangladeshi	1%	Asian: Chinese	0%	Asian: Indian	7%	Asian: Other	11%	Asian: Pakistani	4%	Black: African	18%	Black: British	1%	Black: Caribbean	10%	Mixed: Other	2%	Mixed: White and Asian	3%	Mixed: White and Black	2%	White: British	25%	White: English/Scottish/Irish	2%	White: Irish	2%	White: Other	14%
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White: English/Scottish/Irish	2%																																
White: Irish	2%																																
White: Other	14%																																
<b>SEX</b>																																	
<b>Details of impacts identified</b>	<p>The below graph shows the claimants potentially impacted by gender.</p>																																

	<p style="text-align: center;"><b>Gender of claimants</b></p>  <p style="text-align: center;">Claimants</p> <p style="text-align: center;">■ FEMALE ■ MALE</p> <p>69% of claimants in this group are male, which is a much higher proportion than the borough population data, which is 49%.</p> <p>We know that housing is an area of inequality in gender due to the criteria through which priority housing need is established under the relevant legislation, for example pregnancy and children. Female-headed households make up over half of the council’s housing waiting list and those living in council housing.</p> <p>Introducing this proposal may positively impact males and offer access to housing services that may not have been available in the past.</p> <p>Gender information is unknown for 39% of this group.</p>
<b>SEXUAL ORIENTATION</b>	
<b>Details of impacts identified</b>	There is insufficient data regarding sexual orientation to assess the impact on this group.
<b>PREGANCY AND MATERNITY</b>	
<b>Details of impacts identified</b>	There is insufficient data regarding pregnancy and maternity to assess the impact on this group.
<b>RELIGION OR BELIEF</b>	

<b>Details of impacts identified</b>	There is insufficient data regarding religion or belief to assess the impact on this group.
<b>GENDER REASSIGNMENT</b>	
<b>Details of impacts identified</b>	There is insufficient data regarding gender reassignment to assess the impact on this group.
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	
<b>Details of impacts identified</b>	There is insufficient data regarding marriage & civil partnership to assess the impact on this group.

38. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

This proposal offers to enhance access to the housing waiting list for applicants based on affordability in their current housing situation. Housing applications are reviewed based on needs and aims to eliminate discrimination by ensuring that housing is allocated on the basis of clear criteria.

39. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes, a number of engagement initiatives were undertaken to gather the views of those affected by the changes to the policy as outlined below. Further engagement is not required.

Formal consultation was launched on 12 November 2018 and ended on 21 January 2019, through an on-line consultation survey. As well as advertising the consultation survey on the Council's website, and on the Locata home page, every household currently on the housing register (including Band D) was notified. Consultation workshops were also held with the following stakeholders;

- Members
- Temporary Accommodation User Forums (attended by approximately 500 households over 5 Forums)
- Registered Providers
- Voluntary Sector
- Adult Social Care
- Children's and Young People Services
- Brent Housing Management

As some of the issues that were being consulted on are fairly technical the purpose of these workshops was to go through each issue in detail and to give people the opportunity to ask questions to clarify what we were asking them to give their opinion on. Attendees were then encouraged to express their opinions via the consultation survey that was made available via the Council's consultation portal.

An independent research company, bmg Research were also commissioned to facilitate 2 workshops on the 12 March 2019. The first workshop was made up of a group of housing professionals and the second made up of a cross section of residents of the borough. The purpose of these workshops was to give people more of an opportunity to debate the implications and express their views of the various proposals and possible impact on households seeking social housing.

40. Please detail any areas identified as requiring further data or detailed analysis.

Data on claimants in regards to their protected characteristics, particularly in areas where limited data prevents us drawing any conclusions (as listed below) would help improve our equality analysis.

- Disability
- Sexual orientation
- Gender reassignment
- Religion or belief
- Pregnancy or maternity
- Marriage

41. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

42. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

All allocations of properties made under this proposal will be monitored in line with the Council's Allocation Scheme and statutory reporting requirements to relevant agencies. Operational meetings.

## **SECTION C - CONCLUSIONS**

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

This proposal offers an opportunity for a new group to access housing services based on unaffordability. We can see through analysis of protected characteristics that this group brings different characteristics to those on the current waiting list for example there is a higher proportion of males represented.

However adding extra demand to the current waiting list gives unrealistic expectations to this group. As the average number of social housing units that become available each year is approximately 600, the majority of these households will never receive an offer of social housing. Additionally, being part of the register will create a significant additional workload for the Council.

It is therefore recommended that this proposal be not approved on the basis that the supply of social housing will never realistically be able to meet this demand, but will give false hope to these households that they will receive an offer.

## SECTION D – RESULT

*Please select one of the following options. Mark with an “X”.*

<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	<b>X</b>

## SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

<b>Action</b>	<b>Expected outcome</b>	<b>Officer</b>	<b>Completion Date</b>

## SECTION F – SIGN OFF

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Omari Gayle
<b>REVIEWING OFFICER:</b>	Lavdrim Krashi
<b>HEAD OF SERVICE:</b>	Laurence Coaker