

## APPENDIX 5: EQUALITY ANALYSIS (EA)

<b>POLICY/PROPOSAL:</b>	Morland Gardens Redevelopment
<b>DEPARTMENT:</b>	Regeneration and Environment
<b>TEAM:</b>	Employment, Skills and Enterprise
<b>LEAD OFFICER:</b>	Matt Dibben
<b>DATE:</b>	17.12.2019

*NB: Please ensure you have read the accompanying EA guidance and instructions in full.*

### 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 redevelopment of 1 Morland Gardens, Stonebridge, London NW10 8DY, delivering a new adult education centre, 65 new council homes, affordable workspace, a public facing café, and public realm improvements.

This replaces the existing adult education centre on site. It is a council owned site.

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

Brent Start is the adult education provider on site currently and who will move to a decant site and then back into the building when it is completed.

The adult learners are 19+ and from a diverse demographic mix primarily from within Brent.

The new housing will be provided to those on based on the Housing Allocation Policy.

New business space will be let to a third party with encouragement in the specification to engage the local community,

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.

The Equality Act 2010 and Public Sector Equality Duty informs that the Council must, in the making of decisions in exercise of its functions, have due regard to the need to:

- (a) eliminate discrimination, harassment and victimisation;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it, pursuant to s149 (1) Equality Act 2010. This is known as the Public Sector Equality Duty.

Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

The Public Sector Equality Duty covers the following nine protected characteristics: age, disability, marriage and civil partnership, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The development will deliver the following, with relevance to the Equality Act 2010 and Public Sector Duty:

- Brent Start provides education to circa 3,000 adults per annum from a broad geographic and demographic spectrum. This includes adults with learning difficulties and disabilities, low skills, parents and carers.
- New affordable council homes will be provided including 7 accessible units, as per planning policy, 10% of units are wheelchair adaptable, across all unit sizes. There are also disabled parking spaces for these tenants. 100% of units are affordable as London Affordable Rent (council housing).
- New affordable workspace will be provided responding to demand for low cost business space in London.

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”.

<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.

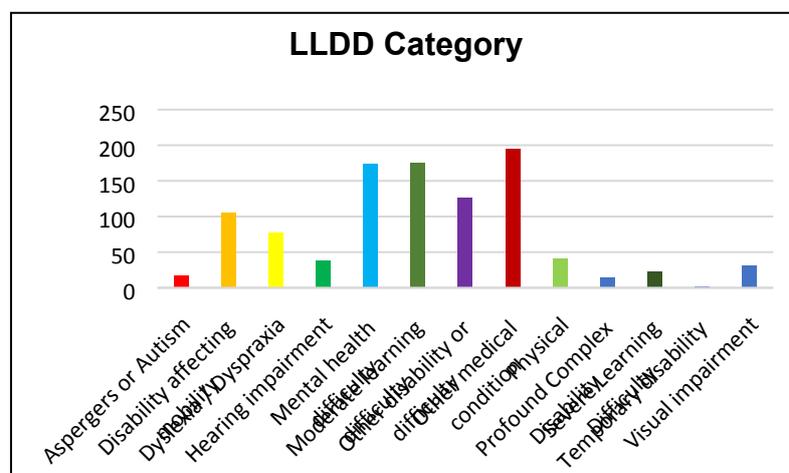
### Brent Start learner demographics:

- 30% of learners are employed, 70% are economically inactive.
- 42% of learners are from the 5 most deprived wards in the borough.
- Diverse ethnivity make-up, with 20% 'Black or Black British – African' and 10.5% 'Asian or Asian British – Indian' being the largest proportion of learners.
- Age profile is diverse and covers all ages 19+

1819 Proportion of Learners by Age			
Borough	Age Band	Starts	%
Brent	19-29	679	11.7%
	30-39	1781	30.8%
	40-49	1271	22.0%
	50-59	778	13.4%
	60-69	326	5.6%
	70+	223	3.9%
Neighbouring Boroughs			12.6%

- 83% of learners are female.
- Overall 18.4% of enrolments have some form of recorded learning difficulty or disability.

### **Overall Enrolments by Learning Difficulty and LLDD Health Category**



Meeting wider socio-economic needs:

**Improving Skills**

- 7% of Brent residents having no qualification and 28% of residents do not have NVQ 2 qualifications (equivalent to 4/5 GCSEs A-C), which in particular hampers people's ability to access employment.
- The education centre will be a major contributor to Brent Start's ability to improve skills in the borough for the benefit of local communities. 42% of Brent Start's learners reside in the five most deprived Wards of the borough.

**High Value Employment and Increase in Average Wage:**

- Currently Brent workers are relatively low paid with almost one third of residents (31%) earned less than the London Living Wage – the second highest rate in London, after Newham. Brent Start supports residents to develop skills to access quality work (preferably paid Living Wage and not zero hour contracts). Also to develop skills of residents in-work, to help them progress in employment.
- The new enterprise hub will also be a boost for local business start-ups, providing support to residents with latent skills that aren't being utilised.

**Outcomes for Young Black Men:**

- In 2016, the unemployment rate for Black Caribbean and Black African young men (aged 16 to 24) was 29%. This was almost double the average unemployment rate for all young men, which was 15%.
- The Moving on Up project to support young black men into quality employment has highlighted the demand from the community for access to entrepreneurship programmes. There are opportunities to link the Moving on Up project to the new enterprise workspace to support self-employment skills and start-up businesses.

**Outcomes for residents with learning disabilities:**

- There are 648 service users 18-64 years old known to social care, of which 18 (2.8%) are in employment, compared to a London average for 2017-18 of 7.5%, with some London boroughs achieving over 10%.
- The specification for the café will make available social value opportunities to support Brent Start learners with learning disabilities, building on the existing café enterprise programme. This will help them to gain work experience and improve their skills and where appropriate to access employment.

**Employment and health:**

- In 2019 there are over 10,800 residents in receipt of Employment Support Allowance (ESA) in Brent, the out of work benefit related to disability or sickness. Of this number, over 5,000 are known to have a mental health issue.

- The Work and Health Programme provided by The Shaw Trust will be able to provide outreach support from the building, responding the Mental Health and Employment Outcome Based Review findings, ensuring that there is a locally accessible offer linking health and employment.

**Preventing re-offending:**

- The new Bright Futures project to help ex-offenders into employment can run skills related activities in the building.

Housing needs demand:

- There are 12,200 households currently in affordable housing need in Brent. Of these, 3,657 currently occupy housing that does not meet their needs. Also, to re-house residents currently in Temporary Accommodation (TA), from the current cohort of over 2,300 homeless households living in TA.
- The new scheme provides 65 new social rented homes that will assist in responding to this need.
- The mix of affordable housing: 100% will be council housing at London Affordable Rent, which was informed through the consultation with the community, staff, learners, and Elected Members.
- Mix of home sizes: Within Brent, there are communities who tend to have larger family sizes. 32% of the homes in the scheme are 3 and 4 bed homes.
- Accessible homes: Many households in London already require accessible or adapted housing in order to lead dignified and independent lives: 28,000 are attempting to move to somewhere more suitable to cope with a disability and more than 267,000 need a home adaptation. More Londoners are living longer and more older people are choosing to remain in their own homes rather than go into residential institutions. To address these and future needs, 90 per cent of London's new build housing should be built to Building Regulation requirement 'M4 (2): Accessible and adaptable dwellings and the remaining 10 per cent of new build housing should be built to Building Regulation requirement 'M4 (3): Wheelchair user dwellings', which is the case in this scheme with 7 of the 65 units to be accessible accommodation.

1. 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>More social housing will be made available. This will be allocated based on the Housing Allocations Policy. Lift access will be available throughout the scheme.</p> <p>The new adult education centre will be available for 19+ year olds. Demographic information shows a broad range of residents accessing Brent Start. The new centre will be larger and have greater capacity than the existing centre. It will be accessible on one floor.</p> <p>New workspace will provide opportunities for people that aren't currently available.</p> <p>The decant location for Brent Start will need to be fitted out appropriately to be accessible. It is all on one ground floor level and has sufficient parking to ensure accessibility. It is also easily accessible via bus or Stonebridge underground.</p>
<b>DISABILITY</b>	
<b>Details of impacts identified</b>	<p>More social housing will be made available. This will be allocated based on the Housing Allocations Policy. It will include homes with disability access, and 7 accessible homes designed for people with disabilities. There is lift access to all properties above the ground floor level.</p> <p>The new adult education centre will be available for 19+ year olds. Demographic information shows a broad range of residents accessing Brent Start. The new centre will be larger and have greater capacity than the existing centre. It will be based across 1 highly accessible floor, as opposed to the current site that is across a number of floors, including areas that aren't accessible by wheelchair.</p> <p>A Changing Places toilet will be considered for inclusion in the education centre.</p> <p>Dementia friendly design principles will be adopted for the garden space.</p>

	<p>Input to the Community Steering Group will also be sought from a disability charity. Bang who are on the group provide expertise in mental health.</p> <p>Two contemplation rooms are being provided in the new building, which can be utilised for mental health first aid or meditation as well as for prayer.</p> <p>New workspace will provide opporutnities for people that aren't currently available.</p> <p>The decant location for Brent Start will need to be fitted out appropriately to be accessible. It is all on one ground floor level and has sufficient parking to ensure accessibility. It is also easily accessible via bus or Stonebridge underground.</p>
<b>RACE</b>	
<b>Details of impacts identified</b>	<p>More social housing will be made available. This will be allocated based on the Housing Allocations Policy.</p> <p>The new adult education centre will be available for 19+ year olds. Demographic information shows a broad range of residents accessing Brent Start. The new centre will be larger and have greater capacity than the existing centre.</p> <p>New workspace will provide opportunities for people that aren't currently available. The aim of the lease is to focus on opportunities for local residents.</p>
<b>SEX</b>	
<b>Details of impacts identified</b>	<p>More social housing will be made available. This will be allocated based on the Housing Allocations Policy.</p> <p>The new adult education centre will be available for 19+ year olds. Demographic information shows a broad range of residents accessing Brent Start. The new centre will be larger and have greater capacity than the existing centre. There is a greater proportion of women than men accessing the adult education, which the new centre can seek to redress by providing access to a wider range of services on site.</p> <p>New workspace will provide opporutnities for people that aren't currently available. The aim of the lease is to focus on opportunities for local residents.</p>

<b>SEXUAL ORIENTATION</b>	
<b>Details of impacts identified</b>	<p>More social housing will be made available. This will be allocated based on the Housing Allocations Policy.</p> <p>The new adult education centre will be available for 19+ year olds. Demographic information shows a broad range of residents accessing Brent Start. The new centre will be larger and have greater capacity than the existing centre.</p> <p>New workspace will provide opporutnities for people that aren't currently available. The aim of the lease is to focus on opportunities for local residents.</p> <p>The offer will be available to residents with all protected characteristics and will not disadvantage any of them.</p>
<b>PREGANCY AND MATERNITY</b>	
<b>Details of impacts identified</b>	<p>More social housing will be made available. This will be allocated based on the Housing Allocations Policy.</p> <p>The new adult education centre will be available for 19+ year olds. Demographic information shows a broad range of residents accessing Brent Start. The new centre will be larger and have greater capacity than the existing centre.</p> <p>Brent Start provides Family Learning and has flexible access to courses for parents or parents to be. There is collaboration with the nearby children's centres at Fawood and Curzon.</p> <p>Childcare support is available via a flexible fund at Brent Start, allocated on a needs basis. Childcare advice is also provided and signposting is given to the Childminder network locally and Family Information Services.</p> <p>New workspace will provide opporutnities for people that aren't currently available. The aim of the lease is to focus on opportunities for local residents.</p>
<b>RELIGION OR BELIEF</b>	
<b>Details of impacts identified</b>	<p>More social housing will be made available. This will be allocated based on the Housing Allocations Policy.</p> <p>The new adult education centre will be available for 19+ year olds. Demographic information shows a broad range of residents accessing Brent Start. The new centre will be larger and have greater capacity than the existing centre.</p> <p>The new centre will have two contemplation rooms, which are not, which is not available in the current building. Current prayers take</p>

	<p>place in any free space that can be found but there isn't a dedicated space.</p> <p>New workspace will provide opporutnities for people that aren't currently available. The aim of the lease is to focus on opportunities for local residents.</p> <p>The project has involved input from a Community Steering Group including two of the local churches in the area to encourage involvement from the local community.</p> <p>The offer will be available to residents with all protected characteristics and will not disadvantage any of them.</p>
<b>GENDER REASSIGNMENT</b>	
<b>Details of impacts identified</b>	<p>More social housing will be made available. This will be allocated based on the Housing Allocations Policy.</p> <p>The new adult education centre will be available for 19+ year olds. Demographic information shows a broad range of residents accessing Brent Start. The new centre will be larger and have greater capacity than the existing centre.</p> <p>New workspace will provide opporutnities for people that aren't currently available. The aim of the lease is to focus on opportunities for local residents.</p>
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	
<b>Details of impacts identified</b>	<p>More social housing will be made available. This will be allocated based on the Housing Allocations Policy.</p> <p>The new adult education centre will be available for 19+ year olds. Demographic information shows a broad range of residents accessing Brent Start. The new centre will be larger and have greater capacity than the existing centre.</p> <p>New workspace will provide opporutnities for people that aren't currently available. The aim of the lease is to focus on opportunities for local residents.</p>

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

No.

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

Participants were from the local community representing the diverse demographic make-up of the local area. This included over 150 residents and a Community Steering Group of local representative groups, as well as engagement with Brent Start staff and learners.

Further engagement activity will take place to inform the management and utilisation of the building, including the Community Steering Group made up of local partner organisations, as well as local residents who will be able to utilise the building.

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

Evaluation will be required on the redesign of the decant option at the Stonebridge Primary School Annexe, to ensure it is sufficiently accessible.

The Brent Start service and future lease of the affordable workspace should continue to engage with the local community to assist with communication and access. E.g. if materials are required in different languages or formats to ensure breadth of access to available opportunities by the community.

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

There are not any further negative impacts following the action plan and proposed mitigations.

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

The housing allocations will be managed according to policy and recorded/ monitored.

The Brent Start enrollments to courses are monitored based on demographics (according to data that is offered by learners, it is not mandatory for learners to complete equality monitoring forms or to complete all sections of them).

There are also regular surveys of staff and learners at Brent Start.

The lease agreement for the affordable workspace will need to include a requirement for demographic analysis of its users of the business space.

## 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 redevelopment provides improved accessibility and contemplation/ prayer facilities for the Brent Start adult education service.

The decant building for Brent Start is in a similar location, set across one floor so with improved accessibility, and has capacity for a prayer room, as well as plentiful parking and accessible via bus.

It provides new social housing that itself is specified to be accessible and includes 7 accessible homes for people with disability.

The new workspace will also be accessible and will be targeted to people in the local community.

Communication to learners at Brent Start will have to be given throughout the process of redevelopment, decant and re-entry to the new site. This will have to be given through extensive communications.

## 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.

Action	Expected outcome	Officer	Completion Date
Deliver a communications campaign to ensure that all current and prospective learners are aware of the move to the decant site and the redevelopment plan. That the service will still be open and operational.	Continued level of enrolments from local communities and without a significant change to the demographic take-up of courses, or by those with disabilities or carers.	Adult Education Senior Manager	July 2020
Ensure air quality of the new buildings housing is managed and any affects of being adjacent to a main road are mitigated (e.g. through the planters that are included throughout the building design).	To mitigate any air quality issues for tenants of the building.	Property Development Manager	January 2020
Monitor Brent Start learner demographics	Continued balance of learners that reflects local demographics.	Adult Education Senior Manager	During decant period (December 2020) and in new building (December 2022)
Seek feedback from Brent Start learners, staff, the Community Steering Group including a disability organisation, on the accessibility of the new building.	Accessibility in new building has improved from the current offer.	Brent Start Senior Manager	August 2020
Seek feedback from Brent Start learners and staff on the new buildings contemplation rooms	Improved facilities for prayer, contemplation, mental health first aid, or meditation.	Brent Start Senior Manager	August 2020

Manage and monitor housing allocations according to the Housing Allocations Policy	Allocations reflective of housing needs.	Housing Development Manager	January 2023
Track the make-up of businesss accessing the new affordable workspace.	Take-up of business space reflective of local demographics.	Economic Growth Senior Manager	January 2023

**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Matt Dibben
<b>REVIEWING OFFICER:</b>	Natalie Gordon -
<b>HEAD OF SERVICE:</b>	Matt Dibben – Head of Employment, Skills and Enterprise 04.01.2020 