

## EQUALITY ANALYSIS (EA)

<b>POLICY/PROPOSAL:</b>	Amendments to the Housing Allocation Scheme - Transfers
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### 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 Equality Analysis covers proposals to make amendments to the Housing Allocation Scheme, that impact existing Council tenants who require a transfer, namely

- Give priority to existing Council tenants, who need a transfer, to bid for all new build properties
- Emergency Management Transfers
- Transfers due to Overcrowding

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. However, the Council is also able to set its own transfer policies in relation to tenants who have asked for a transfer but do not meet the reasonable preference criteria. It proposed that existing Council tenants who are registered for a transfer should be given priority to bid for all new build Council properties. Higher priority will be given to those tenants living in the new development area for new build properties compared with Council tenants living outside the relevant new development area.

Brent Council tenants and tenants of Registered Providers where the Council has nomination rights, may be provided with an emergency management transfer. This will occur when the Allocations Panel has determined that a transfer to alternative social housing is essential to ensure the personal safety of the tenant, members of their household and/or the local community. Where the Allocations Panel approves the transfer, the household will be placed in Priority Band A and may be made a 'direct offer' of alternative accommodation on a like-for-like basis in terms of the number of bedrooms in the new property. It is proposed that the scheme should be amended so that households who are transferred due to an emergency, are moved to the appropriate size accommodation to meet all of their housing needs, including overcrowding.

The current Allocation Scheme is framed to give priority banding to Council tenants as follows;

- Lacking one bedroom no priority
- Lacking two bedrooms – Priority Band C
- Statutory Overcrowded – Priority Band B

It is proposed to amend the scheme to automatically award priority band B to all Council tenants who are lacking three bedrooms or more

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 they will be better placed to secure a property, over homeless households living in temporary accommodation and other tenants who may have been waiting for a transfer for a longer period

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 or old age

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	Impact Neutral/None	Impact 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

- 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 these proposal, we have identified and analysed 291 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.

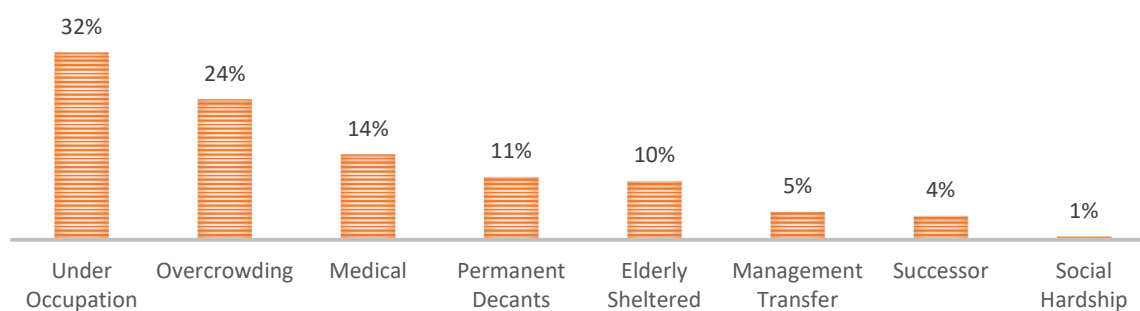
### Methodology

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

In addition, the band reason was analysed for all 291 households on the transfer waiting list. This is because the reason for being on the transfer waiting list is key to understanding patterns and trends. The following graph illustrates the banding reasons for both cohorts:

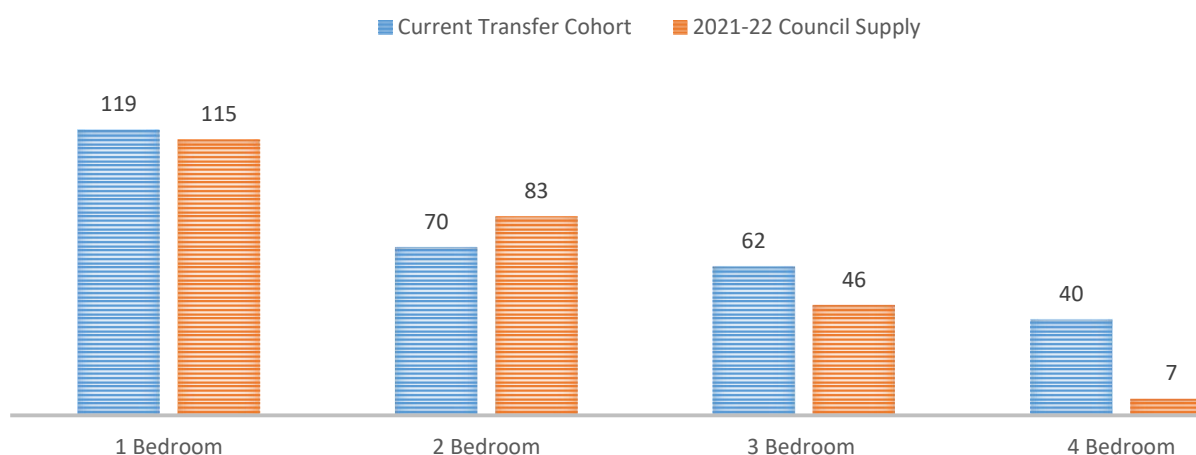
Band reason	Count	%
Under Occupation	92	32%
Overcrowding	69	24%
Medical	42	14%
Permanent Decants	31	11%
Elderly Sheltered	29	10%
Management Transfer	14	5%
Successor	12	4%
Social Hardship	2	1%

### SOCIAL HOUSING TENANTS REASON FOR PLACEMENT ON THE TRANSFER LIST (TOTAL 291)



by reviewing the benefit of this policy based on upcoming supply for this financial year against our current transfer cohort we are able to establish the following:

## CURRENT TRANSFER APPLICANT REPORTED BEDROOM NEED IN COMPARISON TO INCOMING HOUSING SUPPLY



- Although the above graph displays those having a 1 bedroom need being equalled by upcoming housing supply. It is worth noting that as mentioned previously, under occupiers and elderly sheltered applicants are over 50% of the 1 bedroom transfer cohort.
- 100% of transfer tenants who have reported a bedroom need of two bedrooms will benefit from the policy change. If all upcoming two bedroom stock is taken by our transfer cohort there by an 18% (13) surplus properties which will go through to others on the housing needs list.
- 74% (46) of transfer tenants will benefit from this policy who require a bedroom need. In terms of ethnicity the black community will be over-represented within this cohort as they are 60% of the cohort who will would benefit from a transfer three bedroom property, followed by the Asian community who are 17% of the benefiting cohort.
- 17% (7) of those reporting a four bedroom need within the transfer cohort will benefit positivity from this policy change. From the seven that will benefit, we can see that 71% will come from the black community (5), although this is an overrepresentation of the black community, they make up 35% of the overall Brent community.

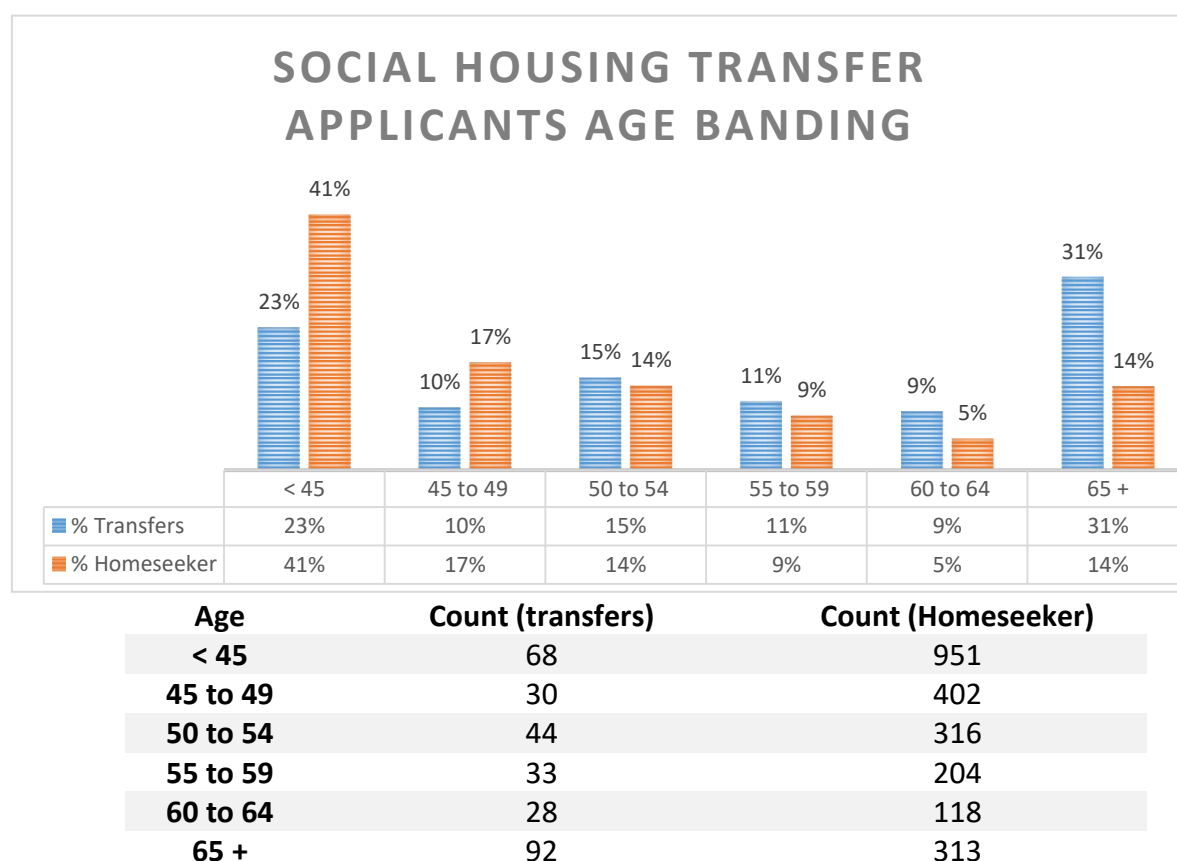
It is also worth noting that Choice Based Letting (CBL) policy still applies; meaning that it is down to applicant whether or not they will accept the offer being presented to them. Although CBL is positive towards tenants and others on the housing list it can also have negative effects the transfer list due to the fact that these decisions cannot be enforced by the Housing Needs Service and could possibly refuse to move to alternative accommodation

2. 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

The below graph shows a significant disproportion at both sides of the age demographic of our social housing tenants.

Although between ages 45-64 there are no significant differences in terms of age of the cohort despite the number of people within both the transfer and homeseeker categories, we can see there is a high representation of our homeseekers are aged under 45 (951) as well as there being a high representation of the transfer tenants aged over 65+ (92). From this analysis we can see this policy change would greatly benefit those 65+ in the transfer category in terms of access of new build properties.

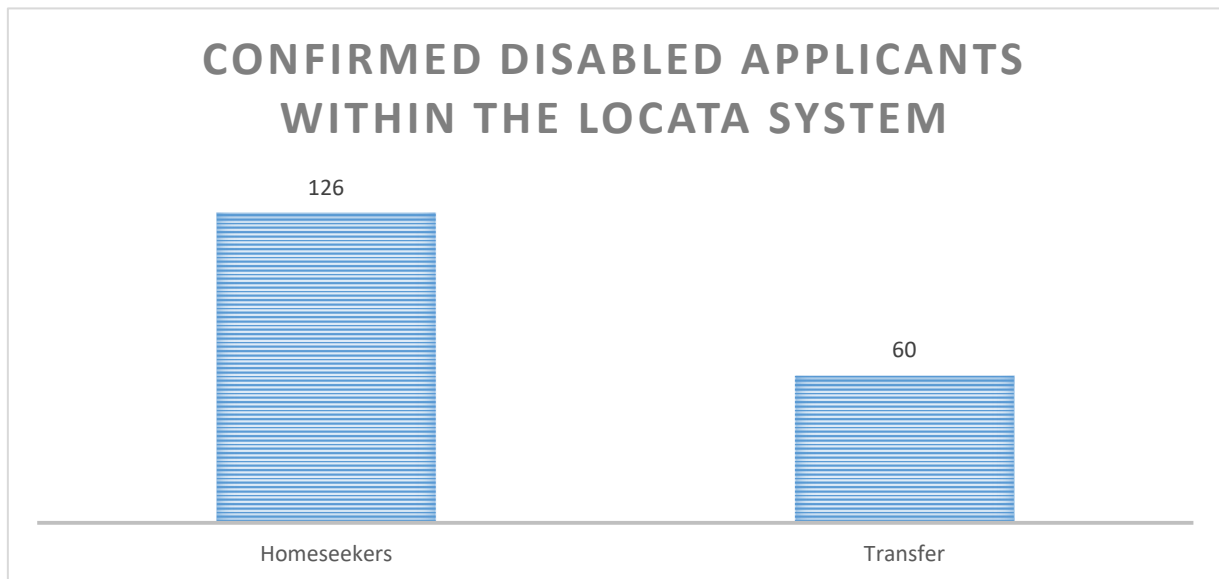


Due to the nature of the transfer list, it is not unexpected that we see an older group represented as those on the list would have been allocated social housing based on their need at the time and then over time their needs have changed. For the older group this

tends to be due to under occupying (43%), elderly sheltered accommodation needs (29%) and medical needs (13%).

## **DISABILITY**

On Locata there are currently 186 confirmed disabled applicants, from which 64% (126) are homeseekers and 32% (60) are transfer cases.

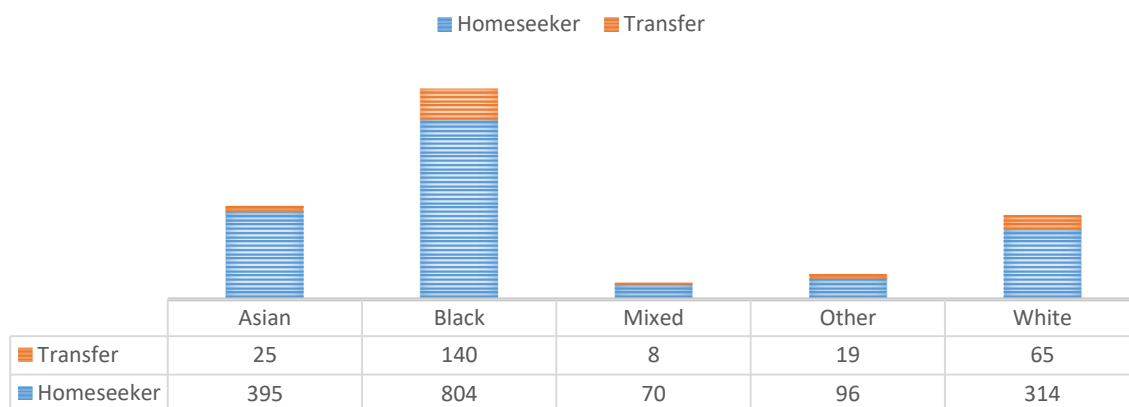


The representation of households with disabilities in the Homeseekers cohort (64%) is over twice the size of the transfer cohort (32%). Both cohorts are over double of percentage of disabled people in the Brent population, which is 14.4% again this is because the nature of the transfer list prioritises those with medical needs as well as the age demographic of the transfer cohort due to moving to elderly sheltered accommodation.

## **RACE**

The below graph shows the transfer list compared to the benefiting cohort by ethnicity. The below data is based on the 257 transfer applicants where ethnicity data was available to analyse, which is 88% of the total transfer cohort.

## TRANSFER AND HOMESSEEKER APPLICANTS BASED ON ETHNICITY



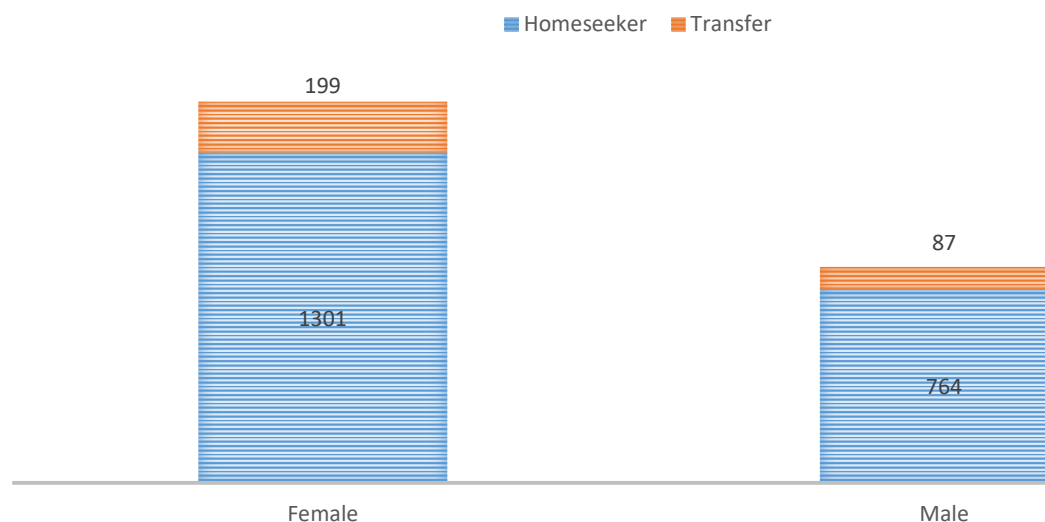
- 19% (379) of the Housing waiting list is white. 25% (65) of the 257 households on the transfer waiting list are white, who would benefit positively from this policy change. In the wider Brent population, 35% are white.
- 48% (944) of the Housing waiting list is black. 54% (140) of the 257 households in the transfer waiting list are also black, who would benefit positively from this policy change. In Brent population, 35% are black.
- 24% (420) of the Housing waiting list is Asian. 10% (25) of the 257 households in the transfer waiting list are Asian, who would benefit positively from the policy change. In Brent's population, 21% are Asian.
- 6% (115) of the Housing waiting list stated their ethnicity as other. 7% (19) of the 257 households in the transfer waiting list are of other ethnic backgrounds, who would benefit positively from the policy change

As shown in the graph above, Black households are highly represented in both cohorts while Asian households are under-represented in both cohorts when compared to the wider population in Brent. In addition, households of mixed ethnic backgrounds are also underrepresented in the benefiting cohort at 3% (8).

### SEX/GENDER

57% (1503) of both homeseeker and transfer cases are headed by women. Women also head likewise 68% (199) of the transfer cases, which would benefit from the policy change. Both cohorts share similarity in their gender structure

## GENDER BREAKDOWN OF HOMESEAKER AND TRANSFER CASES



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. 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**

There was insufficient information available to analyse the sexual orientation of both cohorts. LGBT people make up 5-7% of the population in Brent.

### **PREGANCY AND MATERNITY**

Of the 291 households in Brent Council's transfer list, 18 applicants have a pregnancy/maternity indicator. This is 4% in the cohort that would benefit from the proposal changes.

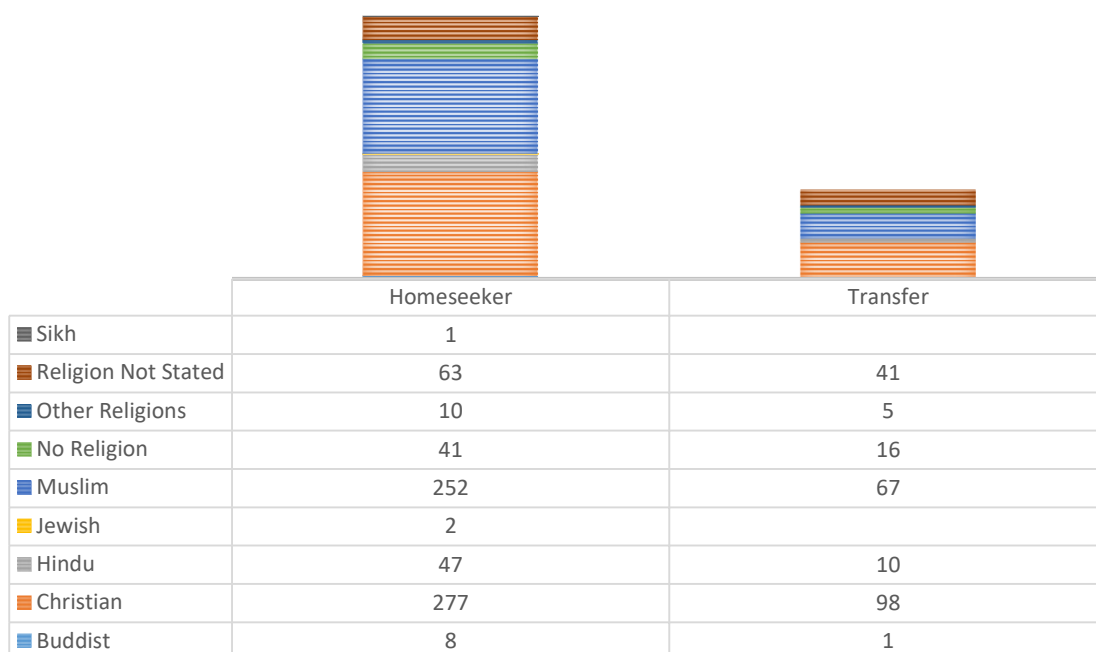
It is important to underline that data on pregnancy/maternity is mostly historical indicators and do not confirm that the pregnancies are current

### **RELIGION OR BELIEF**

The below graph shows the religion or belief of the applicants on the transfer list compared to the benefiting cohort. The below data is based on 81% (238) transfer and

30% (700 transfer applicants where data was available to analyse, which is 88% of the total transfer cohort.

## HOMESEEEK AND TRANSFER COHORT DIVIDED BY RELIGIOUS BELIEF



- 41% (98) of the 238 households in the transfer waiting list are Christians, while 40% (277) of homeseekers are Christian. This is similar to the representation within Brent's overall population, 41% are Christians.
- 28% (67) of the 238 households in the transfer waiting list are Muslims, while 36% (252) of the homeseekers are Muslim. There is an over representation of the Muslim community within the transfer cohort when compared to Brent's overall population where 19% are Muslims.
- 17% (41) of the 238 households in the transfer waiting list have no religion, while 9% (63) of the homeseeker do not have a religion. This is similar to their representation within Brent's Overall population, 11% have no religion.
- 4% (10) of the 298 households in the transfer waiting list are Hindus, while 7% (46) of homeseekers are also Hindu, this means there is underrepresentation of the Hindu community with these cohorts overall within Brent's population, where the Hindu population is 18%.
- 4% of the 267 households in the transfer waiting list have other religions. This is 15% in the cohort that would benefit from the proposal. In Brent's population, 11% practice other religions.

As shown in the graph above, Hindus are underrepresented within both cohorts based on the overall population of the Hindu community within the borough. Moreover, Muslim households are over-represented in both cohorts compared to the wider Brent population. Looking further into the data we can see that 46% of Muslim households are on the transfer list due to overcrowding and 26% are due to medical needs.

### **GENDER REASSIGNMENT**

There is insufficient data regarding gender reassignment of the 298 households in the transfer waiting list. 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**

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

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

No

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 5 August 2021 and ended on 14 October 2021, 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;

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

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.

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.

- 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?

Households who are not Brent Council Tenants would have less priority, as the priority would be given to Brent Council Tenants who are registered for a transfer first. However the properties that become void following the transfer will be available to other cohorts. Also the impact will be mitigated by increasing the overall supply of accommodation through the Stock Maximisation programme and the the New Council Homes Programme (NCHP)

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.

## 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 transfer applicants 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. Under-occupiers are a group 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.

**Age:** There is high representation of the transfer tenants aged over 65+ . This policy change would greatly benefit those 65+ in the transfer category in terms of access of new build properties.

**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 when made available will offer a positive impact for this group

**Race:** Black households are highly represented in both cohorts while Asian households are under-represented in both cohorts when compared to the wider population in Brent. In addition, households of mixed ethnic backgrounds are also under represented in the benefiting cohort at 3%. Due the availability of social housing, the numbers and structure of ethnic groups in the transfer waiting list, reflects the presence of established communities with the larger groups represented in line with Brent's population statistics. This can lead to over-representation of particular ethnic group/s, this proposal would reaffirm this situation.

**Sex:** Households headed by men are under-represented, however this is expected as due to the criteria through which priority housing need is established under the relevant legislation for example pregnancy and dependent children. .

**Sexual orientation:** None of the households benefiting from the proposal is LGBT, this could be due to data gaps regarding the sexual orientation of housing applicants..

**Religion:** Hindus are underrepresented within both cohorts based on the overall population of the Hindu community within the borough. Moreover, Muslim households are over-represented in both cohorts compared to the wider Brent population.

## 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>	