

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Families Homelessness Service Relocation
DEPARTMENT:	Partnerships, Housing and Resident Services
TEAM:	Change and Customer Insight
LEAD OFFICER:	Marta Portalska
DATE:	02/10/2024

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.

This analysis concerns the Families Homelessness Service and proposals for its relocation from the Brent Civic Centre, Wembley Park to the New Millennium Centre, Roundwood.

Overview

The Council has a statutory duty to assess applications from homeless households, pursuant to the Homelessness Reduction Act 2017 and the Housing Act 1996, Part 7 (the 1996 Act).

The families homelessness service is currently based in the Brent Civic Centre and is responsible for assessing homelessness applications from families with dependent children and pregnant women. The service has been experiencing high demand for the past 2 years, due to the national housing crisis and sees an average of 61 families per week. There has also been a recent influx of larger families, many of whom come directly to the Civic Centre at the point they become homeless.

New Millennium Centre

On 5th February 2024, Cabinet approved proposals to develop a **new model of support for Brent residents**. The ambition is to provide a multifaceted programme including the space, tools and knowledge to support residents to improve their situation and increase opportunities, reducing long-term dependency on services.

The new model has been developed in accordance with the following Design Principles:

1. The model should support residents to become more resilient and independent.
2. The programmes and support available should be targeted and easily accessible to those who need them most.
3. The model should incentivise skills and employment and address physical and mental health challenges.
4. The model should align with and support connectivity between related support offers (including those detailed in the Brent Cost-of-Living statement).
5. Development of the model should be intelligence-led.

6. The model should be sustainable.

The approved model includes a 'Community Wellbeing Service' – an expanded version of the Community Wellbeing Project piloted at Bridge Park Leisure Centre which supported up to 400 families per year with access to food and household essentials, as well as providing wraparound support to improve their situations in the longer-term. The Community Wellbeing Service will operate five days per week at the New Millennium Centre, where it will be co-located with wider support provision such as Brent Hubs and specialist debt and immigration advice and will have capacity to support up to 1,000 families and residents per year. The New Millennium Centre site provides the space and core facilities required to deliver the expanded Kitchen, Café and Shop offer of the new Community Wellbeing Service, as well as make use of other on-site facilities including the garden

Management responsibility for the New Millennium Centre will transfer from Adult Social Care (ASC) to Partnerships, Housing and Resident Services in-line with the 1st November 2024 phased launch of the new service. ASC client groups that currently access a day support offer from the site will continue to do so on a sessional basis under new arrangements. This client group will also be able to access and benefit from the new wider suite of services delivered from the site, with support where required.

The New Millennium Centre is accessible for residents including through 206 and 226 Bus Routes and is located in a deprived area with low food accessibility (based on e-food desert index EFDI) and high levels of RSF applications and Council Tax Arrears. It is also within walking distance of the Willesden Centre for Health and Care (2 minutes) and both Harlesden and Willesden High Roads (15 minutes).

Proposal

It is proposed the Families Homelessness Service relocates from the Brent Civic Centre to the New Millennium Centre, Roundwood. The proposed relocation offers several opportunities. The site is located in the south of the borough, with high levels of homelessness demand and is walking distance from the Single Homelessness Service at the Turning Point, The Design Works, Park Parade, Harlesden, NW10 4HT (10 minutes). It is also conveniently located a walking distance to the Crisis Skylight building (15 minutes) and Job Centre Plus Harlesden (15 minutes), both key partners in tackling the homelessness emergency.

The service would also benefit from co-location with other complementary services based at the New Millennium Centre. The site will be host to services designed to support vulnerable adults and families. This includes the Community Wellbeing Service which is targeted at families and as part of which a free, evening Community Kitchen meal service will be available to all (including non-members). Families accessing the families homelessness service may access elements of the food support, as well as potential be eligible to join the wider scheme. Brent Hubs will also be based on site, as well as Debt and Immigration advisors on a timetable basis. The Brent Hubs already work directly with and alongside volunteer and charity organisations, such as Citizens Advice, Age UK, Brent Mind, and many others, enabling much clearer referral pathways and knowledge sharing.

Building works to prepare the site ahead of the service launch offer an opportunity to expand the scope of the works to include an area in the site for delivery of the Family Homeless Service, which would provide purpose-built facilities for the service.

The primary goal of the proposals in this report is to empower residents to become more independent, yet during times of unprecedented crisis support will be available to help with

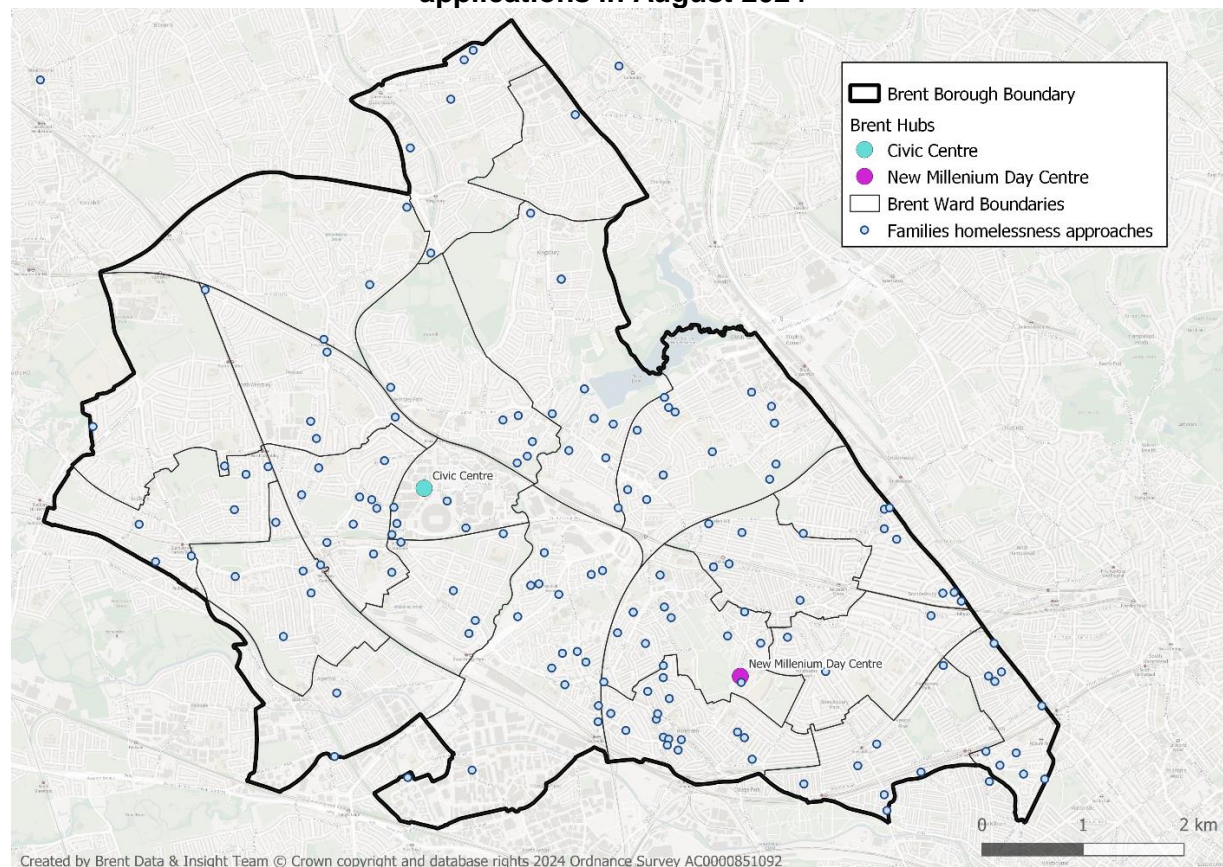
immediate responses to issues such as homelessness risk. Co-location with wider services including Brent Hubs, debt and food support is expected to help vulnerable families with wider challenges they may be facing. Proposals aim to prevent future rough sleeping, and to prevent future homelessness main duty acceptances through the intervention of support services.

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

Proposals may affect families with dependent children and pregnant women who are seeking support from the Families Homelessness Service in the Civic Centre or will seek support from the service in the future.

It is intended that through co-location with services designed to support with access to food and other essentials, general welfare and advice, debt support, immigration advice, employment support and other complementary offers, the proposed relocation will facilitate positive and more sustainable outcomes for residents in the longer-term.

Image 1: Map of contact post codes of families who completed Housing Needs applications in August 2024



*Data shows applications received in August 2024. 238 families completed Housing Needs applications in August 2024. 184 of these provided a contact post code. From the 184, 164 were within Brent (shown in the image), and 20 outside of Brent.

Image 1 above shows the contact post codes provided by 184 families who completed a Housing Needs application in August 2024, in relation to the Brent Civic Centre and the New Millennium Centre. A further 20 applications who provided contact post codes were located outside of Brent.

The 206 Bus Route offers a direct link between the Civic Centre and New Millennium Centre. Other transport methods from the Brent Civic Centre to New Millennium include the 18 Bus Route (29 mins), driving (16 mins), Jubilee line and other bus routes.

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 – this is a statutory service to meet the needs of homeless people in Brent.

Proposals for the relocation may have an impact on Brent residents who require support from the Families Homelessness Service. In considering the proposals, the impact on this group has been considered and outlined in Section B. In proposing the new model of support approved by Brent's Cabinet in February 2024 to be delivered at the New Millennium Centre, an Equalities Impact Assessment was also completed.

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	
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**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

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.

The proposed service relocation may have impacts on families with dependent children and pregnant women that currently access the Families Homelessness Service in the Civic Centre or are likely to seek support from the service in the future. To consider impacts on this group, data of Housing Needs applications submitted by families or pregnant women in August 2024 was analysed. In August 2024, 238 applications were received from this cohort. Brent Council holds the following information on the 238 Lead Applicants from each application.

It is important to note:

- Housing Needs applications are completed online. Once submitted, subject to individual circumstances, a combination of a telephone assessment and/or face to face appointment may follow. Some families present directly at the Civic Centre at the point they become homeless without prior contact with the Council and are encouraged to complete the online application. Of the 238 applications analysed, not all presented at the Civic Centre or resulted in a face-to-face appointment. The data analysed is intended to provide an indication of the types of users accessing the service.
- Some fields in the application form are not mandatory, meaning data shown is representative of those who have provided the information.
- Data shown is representative of the Lead Applicant for a family and doesn't represent all persons within the household.

Table 1: Age Band of Lead Applicant

Age Bracket	Count	Percentage (%)
18 – 24	13	5.5
25 – 34	73	30.7
35 – 44	82	34.5
45 – 54	46	19.3
55 – 64	16	6.7
65 – 74	5	2.1
Over 75	3	1.3
Total	238	100

Table 2: Ethnic origin of Lead Applicant

Ethnicity Category	Count	Percentage (%)
Asian or Asian British	31	13
Black, Black British, Caribbean or African	84	35.3
White	31	13
Mixed or multiple ethnic groups	20	8.4
Other ethnic group	55	23.1
Prefer not to say / not provided	17	7.1
Total	238	100

*Ethnic origin data is available in 38 categories. For the purposes of this report and due to small sample sizes, it has been categorised into 5 groups.

Table 3: Gender of Lead Applicant

Gender	Count	Percentage (%)
Female	169	71
Male	68	28.5
Transgender	1	0.5
Total	238	100

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	
Details of impacts identified	<p>According to the 2021 Census, Brent has a relatively young population when compared with England and Wales, characterised by more adults aged 20-44 and fewer older residents. Around 12% of Brent residents were aged 65 and over compared with 19% nationally. In line with wider trends, the Brent population is ageing – 29% of residents are now aged 50 or over, up from 25% in 2011.¹</p> <p>In August 2024, Lead Applicants of families or expecting families who completed Housing Needs applications were mainly between the ages of 35 – 44 (34.5%), followed by those aged 25-34 (30.7%), and those aged 45-54 (19.3%). Positive impacts are expected for these and all other age groups of service users through benefits of co-</p>

¹ 2021 Census: First Release results. What the new data tells us about the Brent population. Brent Open Data. The publication can be found at: <https://data.brent.gov.uk/dataset/29kgo/2021-census-first-release>

	<p>location of the service with other related support services for vulnerable residents and families, and improved connectivity with a wider support package designed to support residents with things like access to food, debt and immigration support, Brent Hubs and other existing provision (e.g. employment and skill support) which will result in improved longer-term outcomes</p> <p>It is also anticipated that for some applicants within these age groups, there will be positive impacts due to the New Millennium Centre being closer to or more accessible from their current location. However, this positive impact is expected to be largely offset by the reverse impact on service users in these groups who are currently located closer to the Civic Centre.</p>
DISABILITY	
Details of impacts identified	<p>The Equality Act defines disability as a physical or mental impairment that has a "substantial and long-term adverse effect" on the ability to carry out normal day-to-day activities. At this stage we do not have any data to analyse on this cohort, however the positive impacts of co-location of the service at the New Millennium Centre alongside a unique range of complementary services are expected to benefit all service users.</p>
RACE	
Details of impacts identified	<p>Brent has one of the most ethnically diverse populations in the country. The population of Brent at the time of the 2021 Census was 339,800 and is as follows (high-level groupings)²:</p> <ul style="list-style-type: none"> - White ethnic groups – 34.6% - Asian/Asian British groups - 32.8% - Black/Black British groups – 17.5% - Mixed/multiple ethnic groups – 5.1% - Other ethnic groups – 10% <p>Applications received in August 2024 are predominantly from residents of ethnic minority background with Black, Black British, Caribbean or African (35.3%), Other ethnic group (23.1%) and Asian or Asian British (13%) the largest groups. 13% of applications were also from White residents. Therefore, impacts of relocating the service will be most felt by these ethnic groups.</p> <p>It is anticipated all service users, irrespective of race, will experience positive impacts from the relocation, as benefits of co-location with other complementary support services will enable them to be connected with a wider support package.</p>

² Census 2021: Ethnicity in Brent. Topic briefing. 6th January 2023. Available from Brent Open Data at: <https://data.brent.gov.uk/dataset/vq9nd/ethnicity-in-brent-2021-census-topic-report>

	<p>It is also anticipated that for some applicants within these groups, including the Black, Black British, Caribbean or African groups (i.e. 35.3% of service users), which the Census 2021 analysis indicates are more likely to live in nearby wards (Stonebridge, Roundwood, Harlesden & Kensal Green), there will be positive impacts due to the New Millennium Centre likely being closer to or more accessible from their current location. However, this positive impact is expected to be partially offset by the reverse impact on service users in groups who are currently located closer to the Civic Centre.</p>
SEX	
Details of impacts identified	<p>Census 2021 findings show that women comprise just over half (51%) of the Brent population, with 49% male. The sex ratio in Brent is similar to that across London and England and Wales (both 51% female).³</p> <p>From applications received in August 2024, 71% of applicants were female, 28.5% male and 0.5% transgender. This suggests female applicants will disproportionately feel the impacts of relocation of the service, including the expected benefits of co-location with other complementary support services will enable them to be connected with a wider support package.</p> <p>Impacts relating to accessing the service at a new location are expected to be neutral for sex, with broadly similar numbers of service users overall (regardless of sex) living closer to either the New Millennium Centre and Civic Centre.</p>
SEXUAL ORIENTATION	
Details of impacts identified	<p>Service data is not currently held for this characteristic, but it is anticipated all service users, irrespective of sexual orientation, will experience positive impacts from the relocation, as benefits of co-location with other complementary support services will enable them to be connected with a wider support package.</p>
PREGNANCY AND MATERNITY	
Details of impacts identified	<p>Of the 238 applications received in August 2024, 24 specified that someone on the application is expecting a child.</p> <p>This group are anticipated to benefit from the co-location of the service with other complementary support services and increased connectivity with a wider support package.</p>

³ 2021 Census: First Release results. What the new data tells us about the Brent population. Brent Open Data. The publication can be found at: <https://data.brent.gov.uk/dataset/29kgo/2021-census-first-release>

RELIGION OR BELIEF	
Details of impacts identified	Service data is not currently held for this characteristic, but it is anticipated that all service users, irrespective of religion or belief, will experience positive impacts from the relocation of the service.
GENDER REASSIGNMENT	
Details of impacts identified	Brent Council doesn't hold data pertaining to this characteristic, but it is anticipated that all service users, irrespective of gender reassignment, will experience positive impacts from the relocation and increased connectivity with a wider support offer.
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	Brent Council does not hold data pertaining to this characteristic, but it is anticipated that all service users, irrespective of marriage and civil partnership status, will experience positive impacts from the relocation and increased connectivity with a wider support package.

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?

The design of the model which will be based at the New Millennium Centre was directly informed by pilot projects developed through a Cost-of-Living themed Outcomes Based Review (OBR). OBR engagement included a wide range of community research activity with stakeholders and residents through interviews, workshops, pop-ups and focus groups. Findings from this discovery work were synthesized and used at a large-scale collaboration event (Visioning Day) where stakeholders jointly developed ideas and priorities to inform the pilots.

Monitoring indicators and feedback from those accessing support provided by the Cost-of-Living pilots including the Community Wellbeing Project, debt and immigration advice are regularly collected and evaluated and have been positive.

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

N/A

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

N/A

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

As part of the new model of support based at the Community Wellbeing Service, a digital tracking system will be created to support with monitoring of impacts and outcomes of members of the Community Wellbeing Programme, against an agreed outcomes framework. There is potential for this to include referrals to/from the Housing Needs service, which will track and monitor outcomes of improved partnership working and referral pathways between co-located services. A Community Wellbeing Services manager will be in post and based on site to coordinate a smooth and efficient customer journey and partnership working of services on site.

This is in addition to existing data collection and monitoring completed by the Housing Needs and Housing Performance teams.

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.

Overall, the relocation of the Families Homelessness Service is anticipated to have positive impacts on families with dependent children and pregnant women.

The intention is to ensure all changes are clearly communicated. External communications will be key to ensure residents are aware of the relocation of the service and the wider support offer available at the New Millennium Centre as part of the Community Wellbeing Programme.

SECTION D – RESULT

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

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
Tender for contractor to carry out Phase 2 building works	Purpose built facilities are created for the Service and cohort.	Marta Portalska/Jon Cartwright	Early 2025
Subject to approvals, transition of service from the Brent Civic Centre to New Millennium	Ensure a smooth transition of the service between the two locations	Service leads/CCI Leads	Early 2025
Develop comms to notify residents of the service move, update existing forms and documents with new location	Appropriate messaging to notify residents of the service move, as well as to raise awareness of the various services available on site	Communications team/Service leads/ CWS Manager	Early 2025

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Marta Portalska
REVIEWING OFFICER:	
HEAD OF SERVICE:	Jon Cartwright