

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Enter into a contract with Capital Letters
DEPARTMENT:	Community Wellbeing
TEAM:	Housing Needs Service
LEAD OFFICER:	Saleema Nuraney
DATE:	21-10-2020

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 equalities analysis is based on the proposal to enter into a contract with Capital Letters for the provision of accommodation for homeless households.

Capital Letters is a pan London accommodation procurement and management company, set up and owned by 17 local authorities across London. By working collaboratively with London boroughs, it is their intention to reduce competition between councils and to produce better outcomes for London's homeless households.

The Ministry of Housing, Communities and Local Government (MHCLG) have allocated £38 million to support Capital Letters over a three year period and the establishment of Capital Letters was coordinated by London Councils and the London Housing Directors' Group.

This exercise is designed to provide a sufficient supply of private rented sector (PRS) accommodation to meet demand from homeless households, to allow the council to move away from the use of expensive and less desirable nightly paid accommodation and to enable the placement of households in or closer to Brent.

For the period April 2018 to March 2020, 877 housholds were placed into PRS accommodation.

The principal aim of joining Capital Letters is to:

- Increase good quality PRS supply nearer the borough
- Assist the Council to discharge its prevention and relief duties into the private rented sector and to meet its statutory duty to households who are eligible under the Housing Act 96 (as amended).
- Meet housing need through provision of appropriate affordable accommodation
- Promote a consistent approach to the letting of PRS accommodation
- Reduce competition between Councils when trying to secure the limited supply of accommodation that is available

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

The policy will directly benefit homeless families who have approached the Council and are eligible for suitable accommodation. The families are from various ethnic backgrounds and include those who may not have English as their first language as well as those who do.

Four members of Council staff may also be affected as they are seconded to Capital Letters for the duration of the project.

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.

Eliminate discrimination (including indirect discrimination), harassment and victimisation;

The council will allocate accommodation in line with Brent's Placement Policy which will ensure that everyone's housing need is met in a fair, consistent and non discriminatory manner.

Once clients are accepted under the Housing Act 96, they are allocated a Private Rented Offers (PRO) officer who acts as the client's caseworker and assists with undertaking reviews on the suitability of the PRS offer (should the client feel the accommodation is not suitable, the Reviews team would investigate the merits of the suitability review) , fear of violence investigations and works with accommodation providers and other agencies to resolve complaints and tenancy support issues including claims of harassment or discrimination.

Regular performance monitoring allows the Council to ensure there is a consistent approach to complaints and that the housing need is being provided with a caring and responsive approach with regards to complaints of harassment.

Advance equality of opportunity;

Clients with learning disabilities, mental health issues, sensory or physical impairment are also able to access floating support either through a self referral or through a referral from the Council.

Support is also provided by Families Floating Support Service who provide support to families with housing related needs. They are able to arrange interpreters where necessary and help clients liaise with various services e.g. mental health services, hospitals, GP, social services and schools. They work closely with other agencies such as Look Ahead who deal with people with physical or learning difficulties, Elders Voice who deal with elderly applicants, Sanctuary who deal with victims of domestic abuse, Thames Reach who provide floating support for applicants with mental health issues. Whilst this list is not exhaustive, access to these services ensures a sensitive and responsive approach is taken with regard to meeting their housing needs and ensure equal access.

Regular performance monitoring will enable the Council to ensure there is a consistent approach to complaints and that the housing need is being provided with a caring and responsive approach with regards to complaints of harassment, discrimination or victimisation.

The Service will facilitate better monitoring of families who are housed through this scheme by ensuring that protected characteristics are captured by all staff via the current monitoring mechanisms currently in place.

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

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 information used for this analysis is taken from the Housing Northgate database for period April 2018 to March 2020 and consists of households who have been accommodated in the private rented sector.

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	Households will not be discriminated against because of their age. Analysis indicates that there will be a positive impact on clients aged between 25-44 as they currently make up 60% of households in PRS accommodation. This is the most significant group of people who are positively impacted in relation to families with children.
DISABILITY	
Details of impacts identified	<p>Households will not be discriminated against because of their disability. The provision of accommodation is based on client need. Where adapted or single level accommodation is required, Capital Letters is informed to procure suitable accommodation. Due to the shortage of adapted properties, preference is given to households who require properties that have been adapted or developed for people with a disability.</p> <p>Analysis indicates there have been 16 households who have been accommodated in adapted properties however it is important to note that disability data was not available for 43% of this cohort so it is possible there may have been more than 16 households. Applicants who have an illness or disability are required to complete a medical form and include as much detail as possible to enable an accurate assessment. Medical priority is awarded following an assessment and recommendation from the Council’s District Medical Officer (DMO). If the DMO has made a recommendation for a specific type of property e.g. ground floor or single level access accommodation but where none is available, accommodation with downstairs facilities are sought to meet the applicant’s housing need. This flexible</p>

	<p>approach is adopted largely due to the difficulties in procuring adapted properties to meet the needs of disabled applicants.</p> <p>Clients with learning disabilities, mental health issues, sensory or physical impairment are also able to access floating support either through a self referral or through a referral from the Council. All referrals are submitted to Thames Reach who would identify their support needs and assist directly or refer to relevant organisation.</p> <p>Support is also provided by Families Floating Support Service who provide support to families with housing related needs. The types of support offered are :</p> <ol style="list-style-type: none">1. helping families to access appropriate welfare benefits2. helping people into education, training and employment3. support with finding debt-cancelling agencies where applicable4. support with finding appropriate agencies for physical and mental health needs5. helping families to keep tenancies and prevent repeated homelessness6. helping families reintegrate into the community7. supporting people experiencing domestic violence8. supporting families with social/cultural issues <p>They are also able to arrange interpreters where necessary and help clients liaise with various service e.g. mental health services, hospitals, GP, social services and schools to name a few.</p>
RACE	

Details of impacts identified	<p>Households will not be discriminated against because of their race. A sensitive and flexible approach to meeting clients' housing need is taken to ensure adequate and suitable provision is made. People from black and minority ethnic communities are also more likely to be impacted because they are over-represented among homeless acceptances (compared to the general population).</p> <p>The majority of households who access PRS accommodation are from BAME households and are therefore positively impacted (specifically the Black African community) however it is also important to note that data is not available for 191 households. There are 46% of households accommodated in PRS accommodation from the Black community (African, Caribbean, Somalian, Other), 19% are from the White community (Irish, UK, Other), 19% are from Mixed or Other Communities (Afghan, Arab, Other EEA) and 16% are from the Asian community (Indian, Pakistani, Chinese, Other).</p>
SEX	
Details of impacts identified	<p>Households will not be discriminated against based on their sex. However analysis indicates that 69% of households in PRS accommodation are headed by women therefore the provision of PRS accommodation through Capital Letters will have a positive impact on women.</p>
SEXUAL ORIENTATION	
Details of impacts identified	<p>Households will not be discriminated against based on their sexual orientation. Data is not available for 106 households however analysis indicates there is a positive impact on heterosexuals who consist of 90% of households who are accommodated in the private rented sector.</p>
PREGANCY AND MATERNITY	
Details of impacts identified	<p>There is insufficient data to undertake an effective analysis however there is likely to be a positive impact on households with children or pregnant mothers as the majority of households who access this service are eligible families with children. Pregnancy is also classified as a priority need when determining if a household is eligible for assistance under the Housing Act 96 (as amended).</p>
RELIGION OR BELIEF	

Details of impacts identified	There is insufficient data to undertake an effective analysis. Households will not be discriminated against this characteristic.
GENDER REASSIGNMENT	
Details of impacts identified	There is insufficient data to undertake an effective. Households will not be discriminated against this characteristic.
MARRIAGE & CIVIL PARTNERSHIP	
Details of impacts identified	Households will not be discriminated against this characteristic. Data is not available for 118 households however analysis indicates there are currently 46% of households in PRS accommodation who are single/never married compared with 27% who are married.

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?

N/A

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?

There will be on-going performance monitoring via quarterly contract meetings held with Capital Letters as well as monthly operational meetings.

The number of complaints will also be used as a monitoring mechanism to ensure customers have been treated fairly and have not experienced discrimination on the basis of any of the protected characteristics.

Regular performance monitoring will ensure that the scheme does not operate in a manner that disadvantages or discriminates against any particular group.

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 policy is intended to ensure availability of enough suitable accommodation for homeless households to allow the council to meet its duties at a cost that it can sustain and which are affordable to homeless households, against the background of an increasingly difficult market, marked by rapid increases in rent costs.

The policy is also intended to provide more certain and sustainable outcomes for homeless households and enable them to be accommodated within Brent. The offer of a private rented sector accommodation will mean that households can move into more settled accommodation that is affordable, enabling them to settle in a neighbourhood, engage with local services and opportunities and plan their futures with more certainty.

No negative impacts have been identified. The positive equality impacts which have been identified will remain due to the eligibility criteria of the households who can access the service.

Brent Council is committed to the principle of equal opportunities in the delivery of all of its services and will seek to ensure that the Capital Letters initiative is applied in a manner that is fair to all sections of the community regardless of their protected characteristic.

Brent Council and its partners will be responsive, accessible and sensitive to the needs of all applicants. They will not tolerate prejudice and discrimination and will actively promote equality.

The contract terms will ensure households nominated by the Council receive the best possible service in accordance with their individual needs and requirements and

there is a clear understanding of the relationship between the Council and Capital Letters.

The Council will allocate accommodation in line with Brent’s Placement Policy which will ensure that everyone’s housing need is met in a fair, consistent and non discriminatory manner.

The service requirements will ensure that properties procured by Capital Letters will meet rigorous standards, including adhering to the “minimum property standard” as defined in the service level agreement.

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

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SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Saleema Nuraney
REVIEWING OFFICER:	
HEAD OF SERVICE:	 Laurence Coaker 17 November 2020