

APPENDIX 3

EQUALITIES IMPACT ASSESSMENT

Equalities Impact Assessment

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Authority to tender framework agreement for the installation and repair of disabled facilities for council managed residential properties
DEPARTMENT:	Community Wellbeing
TEAM:	Private Housing Services Grants Team
LEAD OFFICER:	
DATE:	15 May 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.

The council report has the objectives of retendering the Contract for the installation and repair of disabled facilities within council owned residential properties. This is a mandatory service and the last contract expired on 31 March 2020, therefore the key objective of retendering the contract is to maintain the service. It is also proposed to use this opportunity to also achieve some improvements:

- To change from a contractor-led service to one where the council takes ownership, this is to be achieved by moving away from a 'Design and Build' contractual format to a more traditional one where the Contractor is only required to carry out the adaptations. Alternatively, Private Housing Services' Agency Service will be used to consult with tenants, design and manage the adaptations. The expected outcome of this will be to achieve an equivalent quality service with that given to other tenures.
- It is also intended to move from a single supplier to a multi-supplier Framework agreement, with two contractors appointed to the Framework. This would increase capacity to carry out adaptations far more quickly and allow a far more flexible approach to be taken than last existed where the council and our tenants were reliant on a single contractor.

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

It is expected that this proposal will have no detrimental effect on stakeholders as this will be a continuation of the current service, for this reason there are also no staffing implications as no roles will be subject to change. Service users are exclusively council tenants who have a

disability and are referred to our service by health or care professionals from the council or its NHS partners, these referral pathways will continue to provide equal access in relation to all of the protected characteristics but generally the service tends to be received by older people.

By improving the service they receive, a very slight positive impact is anticipated for disabled council tenants as the new service will be more responsive, with a neutral impact for all other groups of council tenants.

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.

Whilst having a neutral general impact across the protected characteristics of Race, Ethnicity, Religion or Belief, Sex, Sexual Orientation, Gender Reassignment, Marriage or Civil Partnership, Pregnancy or Maternity, the proposal will predominantly have a positive impact on those council tenants with a disability and/or of advanced age groups. This is not a change, these groups are currently over-represented in Private Housing Services' housing assistance by the definition of the service. When looking at Brent's diversity profile, it is notable that:

- Disability - 1 in 7 (14.5%) Brent residents considered that their health had a limiting impact on their day to day activities. In February 2014, 0.8% (1,650 people) Brent residents of working age - aged 16 to 64 - were claiming disability benefits.
- Age – 11% of people in Brent are aged 65 or older, 20807 of this age group in Brent are predicted to be living with Dementia by 2020. Other common ailments mean that as age increases, so does the risk of significant disabilities.

In considering the relevance of this proposal in relation to equality, the service will continue to have a neutral impact for all protected characteristics. No indirect discriminatory effects would be expected from continuing this service and making improvements in relation to customer service. The service will continue to exercise its expertise in anticipating and meeting the needs of its disabled customers from all protected characteristics. By its nature this proposal will continue to take account of the disabilities of its customers, this is essentially what we do and all of our customers have a disability. Contractors will have to demonstrate that their operatives have had Disability Awareness training.

Tendering contractors will need to demonstrate that in all aspects of their activities as an employer and service provider, they have an established policy of operating within the spirit of the Equality Act 2010 and are promoting fairness and equality of opportunity. A minimum requirement will also be attached so that no employees are to be paid below the minimum wage for London.

In terms of the council's public sector equality duty, this is a continuation of an existing service which is provided in accordance with the council's equality policies. No change is intended or expected in this respect, a flexibility will remain in the service for it to best meet the specific requirements of all groups with protected characteristics. For example, we routinely adjust our processes to accommodate the needs of those with Dementia or other impairments and provide interpretation services where they are required.

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
<p>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.</p>		

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.

Everyone who receives health and social care support, whether from statutory services or by funding the support for themselves, will have choice and control over how that support is delivered, confident that services are of high quality, are safe and promote their individual requirements for independence, well-being and dignity. Disabled facilities installation services play a vital role in enabling disabled people of all ages to maintain their health and independence.

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. The service will meet an individuals needs to help them maintain a level of independence at home.
DISABILITY	
Details of impacts identified	Households will not be discriminated against because of their disability. The provision of disabled adaptations is based on client need following an Occupational Therapy assessment. The service caters for the individual needs of every service user. The service has a positive impact as it enables disabled people to maintain their independence at home.
RACE	
Details of impacts identified	Households will not be discriminated against because of their race. A sensitive and flexible approach to meeting service users needs is taken to ensure adequate and suitable provision is made. Interpreters are also arranged where necessary and liaison with other services where required.
SEX	

Details of impacts identified	The provision of disabled facilities will have a positive impact on both men and women so no negative impacts have been identified.
SEXUAL ORIENTATION	
Details of impacts identified	No negative impacts have been identified. Households will not be discriminated against because of their sexual orientation. The service will meet an individuals needs to help them maintain a level of independence at home.
PREGANCY AND MATERNITY	
Details of impacts identified	Households will not be discriminated against because of their age. The service will meet an individuals needs to help them maintain a level of independence at home.
RELIGION OR BELIEF	
Details of impacts identified	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	There is insufficient data to undertake an effective. Households will not be discriminated against this characteristic.

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 the Contractors.

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 contract 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.

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 Disabled Adaptations Service is delivered in a manner that is fair to all sections of the community regardless of their protected characteristic.

The tender process will also include method statements which allow the panel to assess how well the Provider is able to meet the needs of individual service users. The panel will also be assessing Providers to ensure their staff are DBS checked.

The specification also includes Brent's commitment to Equality and Diversity in Procurement and states clearly the commitment we expect from Provider to promote equality and diversity, taking into account the needs of the people protected under the Equality Act 2010 in respect of the Protected Characteristics.

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	