# EQUALITY ANALYSIS (EA)

| POLICY/PROPOSAL: | The accepted homeless households living in TA - these people will benefit from more stock being available |
|---|---|
| DEPARTMENT: | Housing |
| TEAM: | Housing Needs |
| LEAD OFFICER: | |
| DATE: | |

*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.

Currently, 70% of all available social housing is allocated to accepted homeless cases. This was agreed at a time when 70% of the Housing Register (priority bands A_C) was made up of these households, as has been a major contributing factor in the Council's success in reducing the number of homeless households living in temporary accommodation. However, there has been a negative impact on Council tenants registered for a transfer to alternative accommodation, and is a contributing factor to council tenants remaining in overcrowded accommodation.

Accepted homelessness households now make up approximately 60% of the Housing Register (priority bands A_C), and it is therefore proposed that the proportion of lettings should be changed to reflect this and increase the percentage of available social housing which is allocated to existing Council tenants who require a transfer.

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

**By increasing the stock available to the accepted homeless it will have a positive impact. Currenty there are 1,599 accepted in temporary accommodation. Under age 50 years make up 63% of this profile.**

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. It is also an effect of poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households. Black Africans make up 21% of current accepted homeless households compared to 7.9% in the wider borough.

(Source: 2016 population from GLA)

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 *is* 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 | |

![Brent logo]

| Has the potential for negative or positive equality impacts been identified with this policy or proposal? | X | |
|---|---|---|

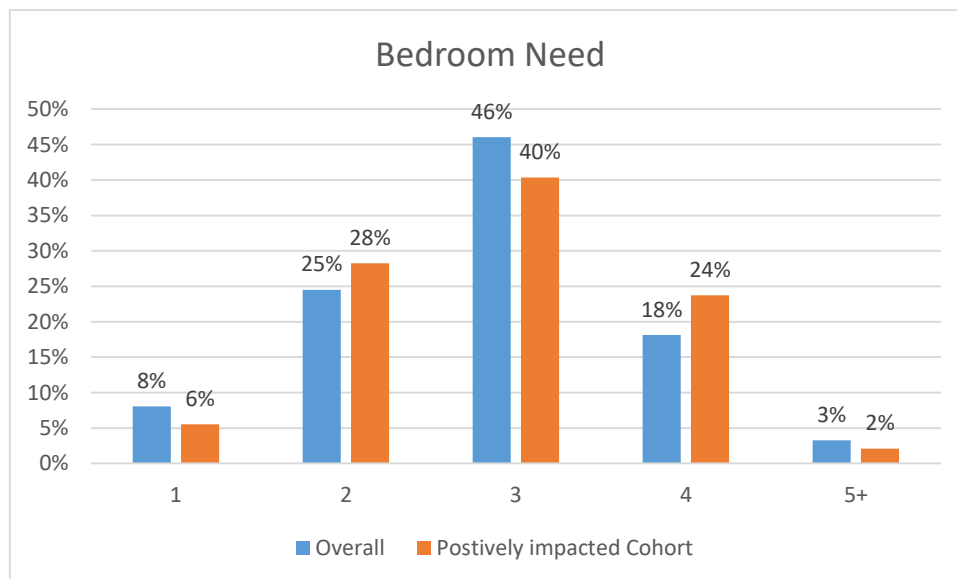**If you have answered YES to ANY of the above, then proceed to section B.**
**If you have answered NO to ALL of the above, then proceed straight to section D.**

## 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.
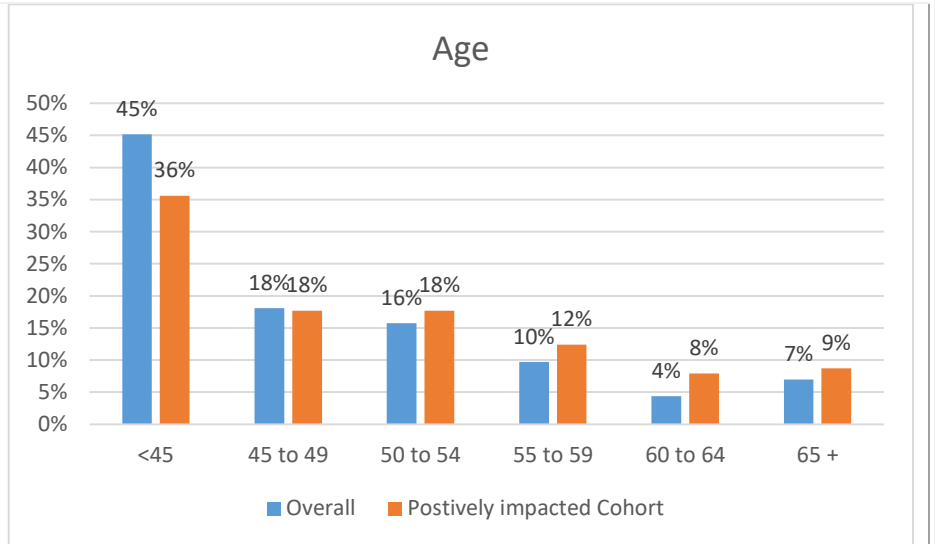
**Currently there are 1,599 homeless households currently awaiting social housing on our choice based letting system (blue bars). According to our data the maximisation of our stock would positively affect 368 homeless households of various bedroom sizes (23% of our current homeless population, orange bars).**

**This is due to there currently being 379 households who have been waiting for a property of their reported bedroom need over the average waiting time.**



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 | |
|---|---|
| |  **The profile is that of a relatively younger age. Under age 50 years make up 63% of this profile and under 55 make up 79%. The positively impacted cohort is that of a similar profile, benefiting those of older age groups above 50 years slightly more.** |

## DISABILITY

| Details of impacts identified | Less than 2% of the overall cohort have a disability and 2% of the benefiting cohort. The presensce of disability in both rehousing cohorts is much less 14% in the wider Brent population.<br><br>We believe the low presence of diability is likely to be a lack of data collection on this charctrastic. Only 45% of the records in both cohorts have disability data completed. |
|---|---|

## RACE

| Details of impacts identified | |
|---|---|
| | |

## Ethnicity
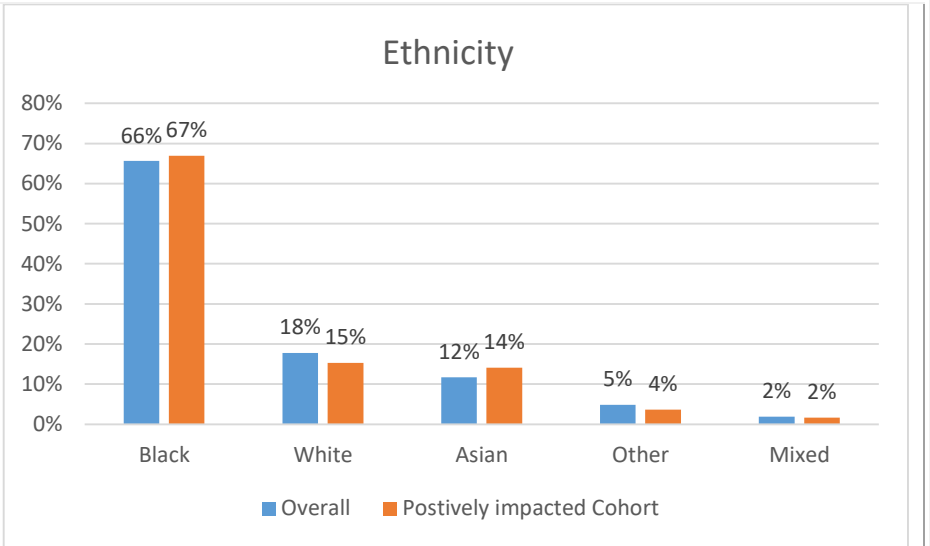
The overall and positively impacted cohort both have similar profiles. However, compared to the wider Brent population, black households are over-repesnted in both cohorts. In Brent, black people make up 21% whereas this is 66% to 67% in both cohorts.

**SEX**

**Details of impacts identified**

## Gender
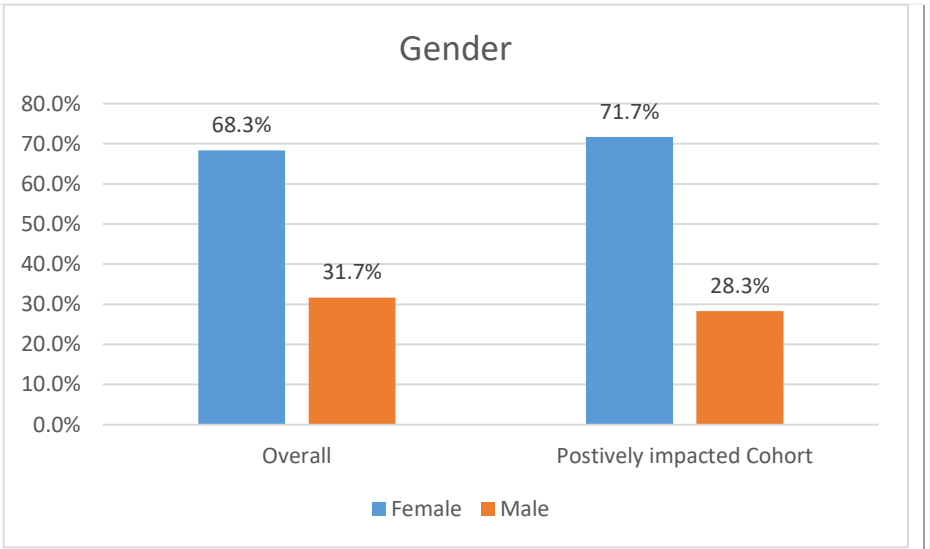
As the graph shows, female are over-represented in both the overall cohort (68.3%) and the benefiting cohort (71.7%). Females make up 49% of Brent's population. In general women are over represented in the cohorts receiving housing services due to reasons such maternal parenting, social attitudes and economic deprevation. Both profiles above are similar.

**SEXUAL ORIENTATION**

| Details of impacts identified | We have very limited data on this category. |
|---|---|

## PREGANCY AND MATERNITY

| Details of impacts identified | | | | | | |
|---|---|---|---|---|---|---|

| Applicant Pregnancy /Maternity | Overall | Postively impacted Cohort | | Overall | Postively impacted Cohort |
|---|---|---|---|---|---|
| Maternity | 8% | 4% | | 135 | 16 |
| No data | 92% | 96% | | 1464 | 363 |
| **Total** | **100%** | **100%** | | **1599** | **379** |

Data held shows minimal impact on this profile. However these are the pregnancies if declared and live at the time.

## RELIGION OR BELIEF

| Details of impacts identified | We have no data on 90% of this cohort therefore it is unreportable. |
|---|---|

## GENDER REASSIGNMENT

| Details of impacts identified | We have no data on 94% of this cohort therefore it is unreportable. |
|---|---|

## MARRIAGE & CIVIL PARTNERSHIP

| Details of impacts identified | We have no data on 90% of this cohort therefore it is unreportable. |
|---|---|

| 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?

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

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

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

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## 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.

**Increased stock for the accepted Homeless would naturally have an overall positive impact.**

**Age: The profile is that of a relatively younger age. Under age 50 years make up 63% of this profile and under 55 make up 79%. The positively impacted cohort is that of a similar profile, benefiting those of older age groups above 50 years slightly more.**

**Sex:** Female are over-represented in both the overall cohort (68.3%) and the benefiting cohort (71.7%). Females make up 49% of Brent's population. This is as expected as women are over represented in the cohorts receving housing services due to reasons such maternal parenting, social attitudes and economic deprevation. Both profiles above are similar. Females benefit slightly more in the benefiting cohort (68.3% compared to the benefiting cohort 71.7%).

Race: The largest proportion is made up of black households, 66% in the overall cohort and similarly 67% in the benefiting cohort. Asians benefit slightly more in the benfiting cohort by 2% to 14%, however the difference is marginal and both profiles are similar.

Overall we expect increased stock for Homeless to have a positive impact but there are only marginal differences when looking at the benefiting cohort profiles.

## SECTION D – RESULT

*Please select one of the following options. Mark with an "X".*

| 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 |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

| OFFICER: | |
|---|---|
| REVIEWING OFFICER: | |
| HEAD OF SERVICE / Operational Director: | |

EQUALITY ANALYSIS (EA)

**Brent**

| POLICY/PROPOSAL: | The council tenants who are under occupying - these people could potentially benefit from the financial incentive package |
| --- | --- |
| | |
| DEPARTMENT: | Housing |
| TEAM: | Housing Needs |
| LEAD OFFICER: | |
| DATE: | 2 August 2021 |

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

## SECTION A – INITIAL SCREENING

| |
| --- |
| 6. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results. |

### Tackling Under Occupation to Increase Supply of Larger Properties

4.7 If the Council can decrease the high volume of Council tenants who are currently under-occupying their homes, there will be more larger properties available to alleviate the pressure on families living in overcrowded housing. Current levels of overcrowding in the Council stock are:

- Band B (statutory overcrowding) – 23
- Band C (lacking two bedrooms) – 48
- Band D (lacking 1 bedroom) - 380

4.8 Currently, only those households lacking two or more bedrooms have priority under the Allocations Scheme to transfer to larger accommodation. Building new homes and increasing the proportion of larger homes within new supply will be key in tackling overcrowding but better use of the existing stock and managing under-occupation form the other side of the equation. Recent analysis indicates that there are 1703 under-occupied homes in the Council's stock, as shown in Table 2.

4.9 Currently, only 89 households have registered via Locata to downsize within Brent - 5% of the households known to be under-occupying. These households are not obliged to move, although some may choose to do so for a variety of reasons including the cost of renting a larger home, or issues relating to age or ill-health. Factors influencing a decision to remain in a home include:

- Mobility or health, for example not wishing to leave a ground floor property

- Financial reasons, for example where a tenant is receiving a Discretionary Housing Payment (DHP) or occupies a home at a social rent and does not wish to move to a new home where the rent may be higher
- Locality, for example where a tenant has a long connection with a neighbourhood and has family, friends and support networks there
- Tenants are using spare bedrooms for other purposes such as a home office, nursery or to accommodate regular visitors or, either with or without the Council's consent, sub-letting a part or all of the property, potentially in breach of the tenancy agreement.

4.10    These and other factors underlie the apparent low demand for moves among under-occupiers. However, we have seen what results can be achieved by having a dedicated officer to work with these families to offer a tailored service, to identify an appropriate smaller property to meet their housing needs. The Housing service is increasing capacity to work with tenants who are under occupying, by creating a dedicated team of three officers, who will work with these tenants to increase the number of transfers

4.11    At present, the Council offers financial Incentives for downsizing as follows;

- £2000 per bedroom released, to a maximum of £6000 per household
- Free removal, disconnection and reconnection of white goods service
- £500 towards the cost of moving out of borough

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

**Those more likely to be impacted are those of an older age profile, particularly once dependants have left home and the bedroom need decreases. Over age 50 years make up 91% of this profile.**

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8.    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. It is also an effect of poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households. Black Africans make up 21% of current accepted homeless households compared to 7.9% in the wider borough.

(Source: 2016 population from GLA)

**Brent**

9. 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 | |

10. Please complete **each row** of the checklist with an "X".

**Screening Checklist**

| | YES | NO |
|---|---|---|
| Have you established that the policy or proposal *is* 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 | |

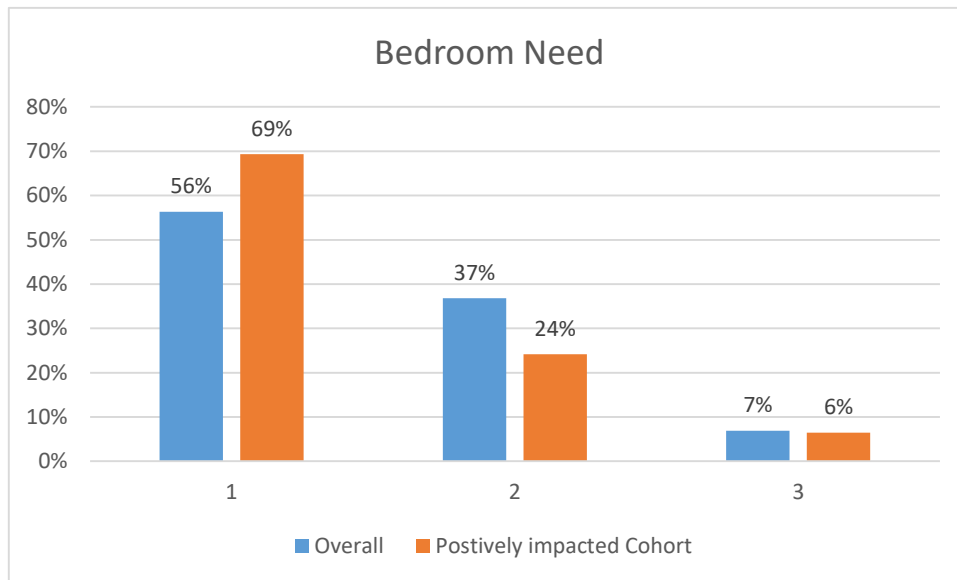**If you have answered YES to ANY of the above, then proceed to section B.**
**If you have answered NO to ALL of the above, then proceed straight to section D.**

## SECTION B – IMPACTS ANALYSIS

8. 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.
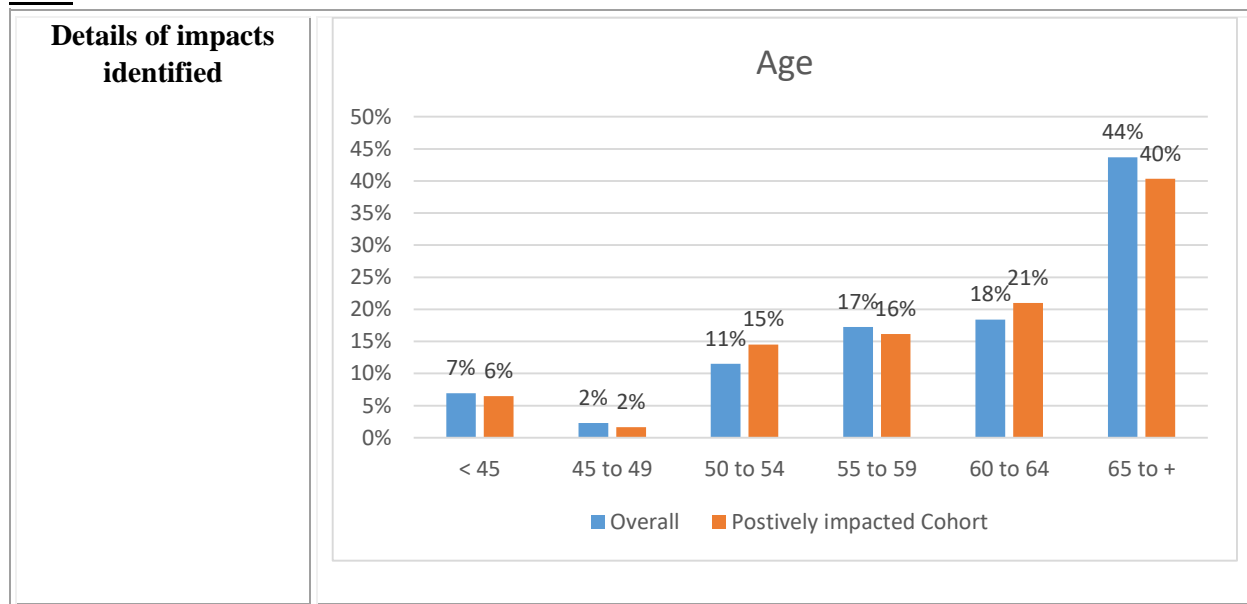
**Currently there are 87 households awaiting social housing on our choice based letting system due to under occupation. According to our data a financial incentive package would positively affect 62 under occupying households of various bedroom sizes (71% of our current under occupying population).**

**This is due to there currently being 62 households who have been waiting for a property of their reported bedroom need over the average waiting time.**



Bedroom Need chart showing Overall and Positively impacted Cohort percentages:
- 1: Overall 56%, Positively impacted Cohort 69%
- 2: Overall 37%, Positively impacted Cohort 24%
- 3: Overall 7%, Positively impacted Cohort 6%

9. 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 | |
|---|---|
| |  |

Age chart showing Overall and Positively impacted Cohort percentages:
- < 45: Overall 7%, Positively impacted Cohort 6%
- 45 to 49: Overall 2%, Positively impacted Cohort 2%
- 50 to 54: Overall 11%, Positively impacted Cohort 15%
- 55 to 59: Overall 17%, Positively impacted Cohort 16%
- 60 to 64: Overall 18%, Positively impacted Cohort 21%
- 65 to +: Overall 44%, Positively impacted Cohort 40%

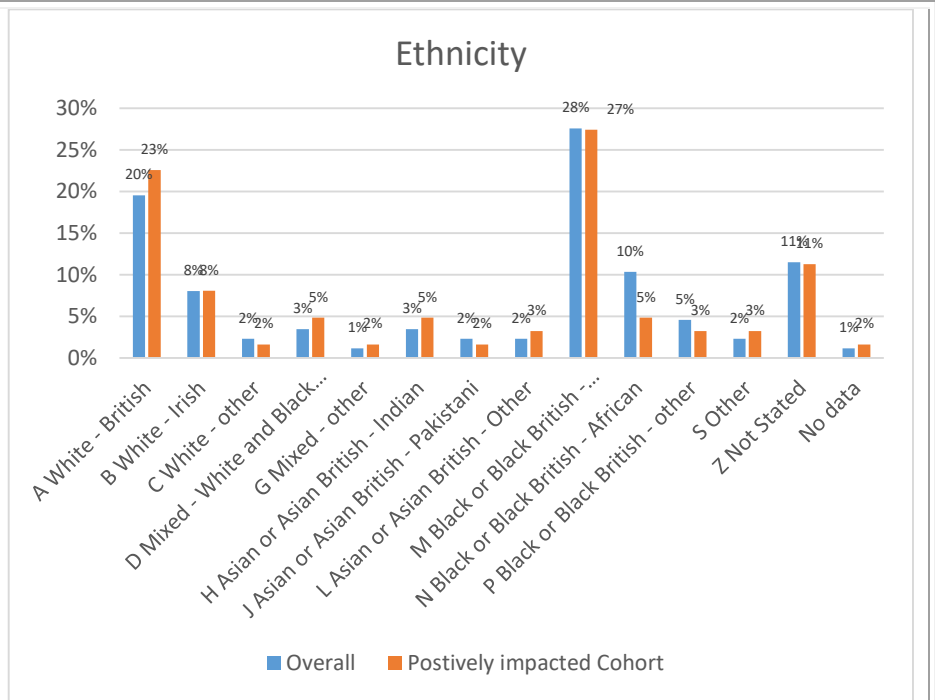| | As expected the age profile of those under occupying is that of an older age. **particularly once dependants have left home and the bedroom need decreases.** |
| --- | --- |
| | **We can see a similar profile would benefit from a financial incentive package. The age group most positively impacted by this would be age 50 to 54 (15%) and 60 to 64 (21%) although the difference between both cohorts is minor.** |

## DISABILITY

| Details of impacts identified |  |
| --- | --- |
| | In households with disability data, 21% of the households are disabled. Similarly, 19% are disabled in the benefiting cohort of the under occupying. |
| | The representation of households with disabilities in both cohorts is almost equal in both cohorts. This is slightly higher than the percentage of disabled people in the Brent population, which is 14.4%. |

## RACE

| Details of impacts identified | |
| --- | --- |
| | |

## Ethnicity



Of the confirmed ethnicities (76) within the total under occupying profile, 49% of the cohort are black (37 applicants). This is also consistent in our identified cohort of those who will be positively affected by a financial incentive package, totalling to 41% (22) of confirmed ethnicities; identified as positively benefitting from this policy change (54 confirmed ethnicities from benefiting cohort). Blacks make up the largest proportion of both cohorts.

By ethnicity the profile is similar in both the overall and benefiting cohort.

## SEX

**Details of impacts identified**
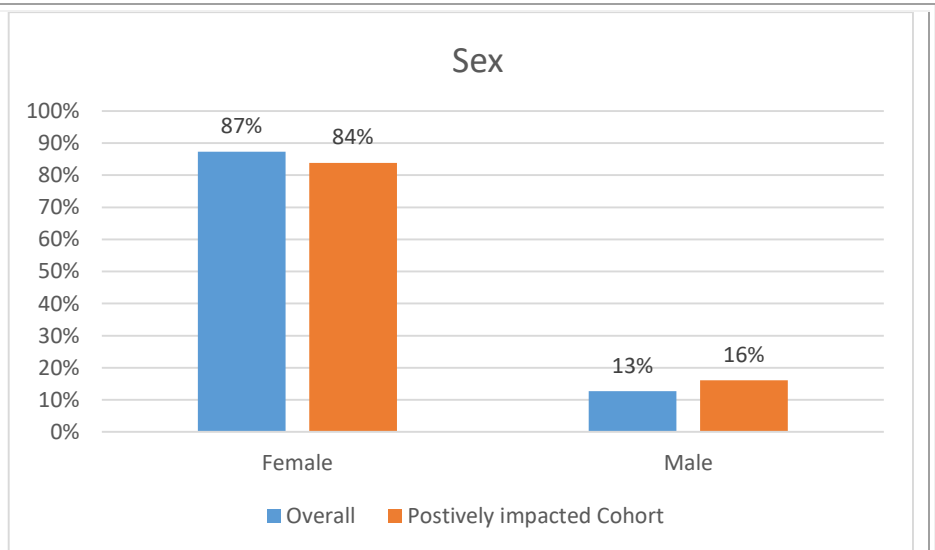
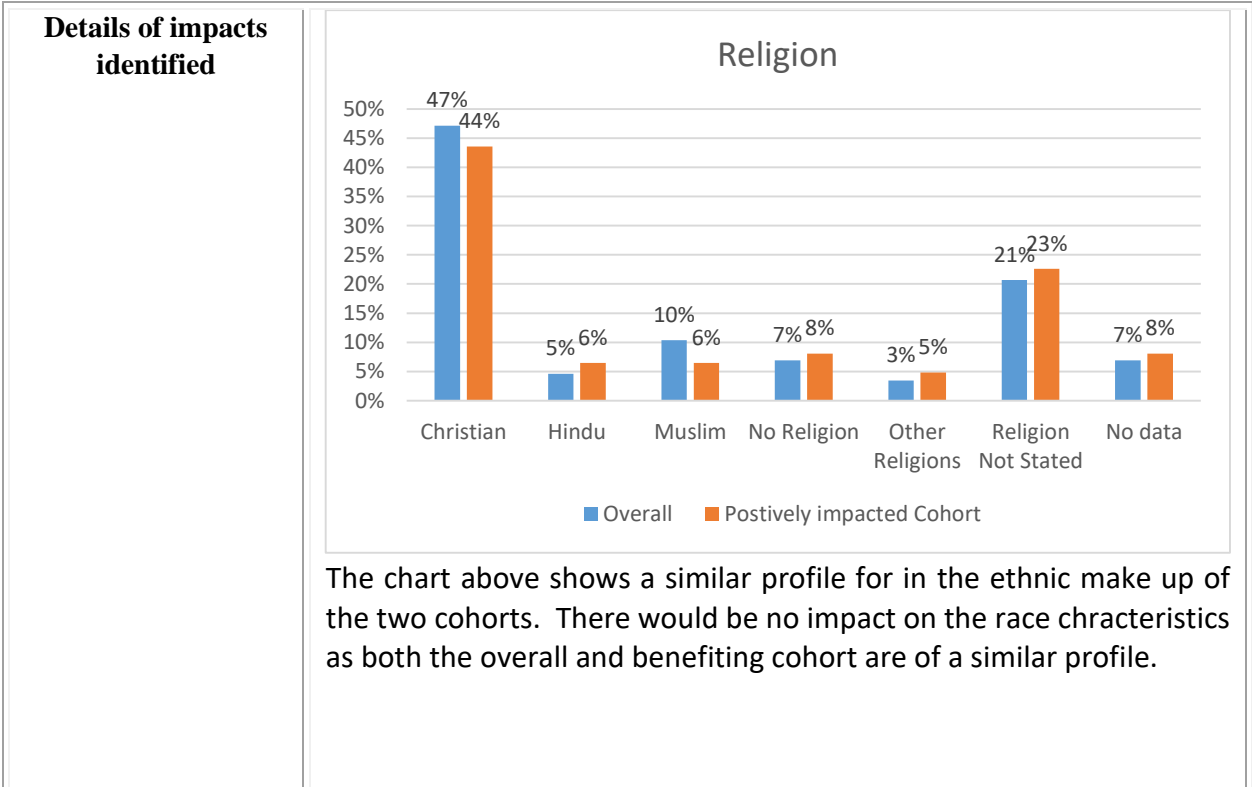| | Female applicants make up a larger proportion of the cohort as expected. This is due to multiple reasons such maternal parenting, social attitudes. We have a similar profile for the benefiting cohort, and there is some minor positive impact on the male applicants. |
|---|---|

## SEXUAL ORIENTATION

| Details of impacts identified | There is insufficient data regarding sexual orientation of the households on the under occupying list to assess the impact on these groups. We do not however consider there to be any adverse impacts on this group. |
|---|---|

## PREGANCY AND MATERNITY

| Details of impacts identified | As we would expect, there are no pregnancy and maternity cases on the under occupying list. The data shows these applicants are without dependants. |
|---|---|

## RELIGION OR BELIEF

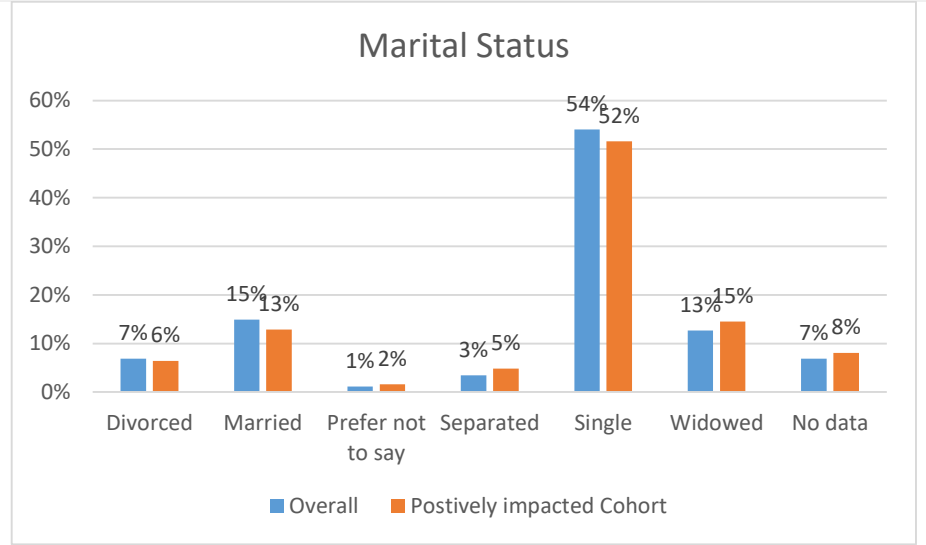| Details of impacts identified | |
|---|---|
| | **Religion**<br><br>Christian: Overall 47%, Positively impacted Cohort 44%<br>Hindu: Overall 5%, Positively impacted Cohort 6%<br>Muslim: Overall 10%, Positively impacted Cohort 6%<br>No Religion: Overall 7%, Positively impacted Cohort 8%<br>Other Religions: Overall 3%, Positively impacted Cohort 5%<br>Religion Not Stated: Overall 21%, Positively impacted Cohort 23%<br>No data: Overall 7%, Positively impacted Cohort 8%<br><br>■ Overall  ■ Postively impacted Cohort |
| | The chart above shows a similar profile for in the ethnic make up of the two cohorts. There would be no impact on the race chracteristics as both the overall and benefiting cohort are of a similar profile. |

## GENDER REASSIGNMENT

| Details of impacts identified | There is insufficient data regarding gender reassignment of the 87 households on the under occupying list. Subseqently, none of the 62 benefiting cohort had data available on gender reassignment. |
|---|---|

| | 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.<br><br>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 chorts in the under occupying list and the matched cohort. |
|---|---|

## MARRIAGE & CIVIL PARTNERSHIP

| **Details of impacts identified** | |
|---|---|
| | Marital Status<br><br>Overall / Postively impacted Cohort<br><br>Divorced 7% 6%, Married 15% 13%, Prefer not to say 1% 2%, Separated 3% 5%, Single 54% 52%, Widowed 13% 15%, No data 7% 8%<br><br>There is no major impact by maritial status. Both the overall and benefiting cohort are of a similar profile |

| 10. Could any of the impacts you have identified be unlawful under the Equality Act 2010? |
|---|

No

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

| |
|---|

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

None

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

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

## 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.

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: The profile of those that underoccupy a property are typically that of an older age. 91% are over 50 years old, who are looking to downsize, with 56% of the overall cohort looking to downsize to a one bedroom property and 37% of the overall cohort looking to downsize to a 2 bedroom property. According to the data, only 6 of the applicants have children recorded in the data.

Sex: Households where the male is the main applicant is under-represented in both the overall at 13% compared to 87% of males. Female headed households make up over half of the council's housing waiting list and those living in council housing.

Race: The largest proportion is made up of black households, 49% in the overall cohort and similarly 41% in the benefiting cohort. Whites and Asian Indian proportion increases slightly in the benefiting cohort.

## SECTION D – RESULT

*Please select one of the following options. Mark with an "X".*

| A | CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED | |
|---|---|---|
| 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 |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

| OFFICER: | |
|---|---|
| REVIEWING OFFICER: | |
| HEAD OF SERVICE / Operational Director: | |

EQUALITY ANALYSIS (EA)

**Brent**

| POLICY/PROPOSAL: | The council tenants who need a transfer due to overcrowding - these people will benefit from more stock |
|---|---|
| DEPARTMENT: | Housing |
| TEAM: | Housing Needs |
| LEAD OFFICER: | |
| DATE: | 2 August 2021 |

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

## SECTION A – INITIAL SCREENING

| 11. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results. |
|---|
| **Tackling Overcrowding** <br><br><br> Problems of overcrowding and under-occupation will be shared by all providers in the borough.  Given this, the role of nomination protocols will be considered, for example to assess whether acceptance of a smaller number of Council nominations to some schemes could increase opportunities for relevant moves, with some element of reciprocation. <br><br> Local, London-wide and national mutual exchange schemes are in place but are often difficult for tenants to negotiate.  Better information and support for tenants will be provided, although the number of moves other than like-for-like exchanges is likely to be low. Similarly, the Mayor's Housing Moves scheme, in which Brent is an active participant, allows tenants to transfer from one borough to another, although it is based on a principle of no net loss of lettings and the numbers involved are small. This scheme is currently under review and criteria may change in the future. <br><br> Council tenants who are registered for a transfer are already given priority to bid for new properties that become available on their estate, to enable them to remain on the estate and avoid having to relocate to another area.  As part of the review of the Council's Allocation Scheme, It is proposed that existing council tenants who are registered for a transfer should be given priority to bid for <u>all new build </u>council properties, as opposed to only those new build properties that become available on their estate.  There are currently 68 families who are registered for a transfer, due to being overcrowded by 2 bedrooms or more.  By ring-fencing all new build properties to existing council tenants, these families will have priority access to secure 3 and 4 bedroom properties, and so resolve their overcrowding.  This will result in fewer |

properties being available to homeless families, particularly those requiring larger properties, immediately.

The review of the Allocation Scheme also proposes to automatically place families living in a council property, who are overcrowded and lacking 3 bedrooms into Priority Band B, for a transfer. Currently only families who meet the definition of statutorily overcrowded, as per The Housing Act 1985, Part 10, are automatically placed in Band B.

The review of the Allocation Scheme also proposes to allocate Council tenants the appropriate size accommodation to meet all of their housing needs, including overcrowding. Currently families are only offered accommodation on a like-for-like basis in terms of the number of bedrooms in the new property. This is because the reason the household has been awarded an emergency management transfer is to address the issue of personal safety, often related to domestic abuse, gang related violence, hate crime or threats to kill, as opposed to their overcrowding. By making this change the family's overcrowding will also be resolved.

Currently, 70% of all available social housing is allocated to accepted homeless cases. This was agreed at a time when 70% of the Housing Register (priority bands A_C) was made up of these households, as has been a major contributing factor in the Council's success in reducing the number of homeless households living in temporary accommodation. However, there has been a negative impact on Council tenants registered for a transfer to alternative accommodation, and is a contributing factor to council tenants remaining in overcrowded accommodation.

Accepted homelessness households now make up approximately 60% of the Housing Register (priority bands A_C), and it is therefore proposed that the proportion of lettings should be changed to reflect this and increase the percentage of available social housing which is allocated to existing Council tenants who require a transfer.

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

**Those more likely to be impacted are those of a relatively younger age profile that are still living with dependents and therefore have a greater bedroom need.**

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13. 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. It is also an effect of poverty and disadvantage: some ethnic groups, for example Black Africans, are over-represented among homeless households. Black Africans make up 21% of current accepted homeless households compared to 7.9% in the wider borough.
>
> (Source: 2016 population from GLA)

14. 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 | |

15. Please complete **each row** of the checklist with an "X".

**Screening Checklist**

| | YES | NO |
|---|---|---|
| Have you established that the policy or proposal *is* 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.**
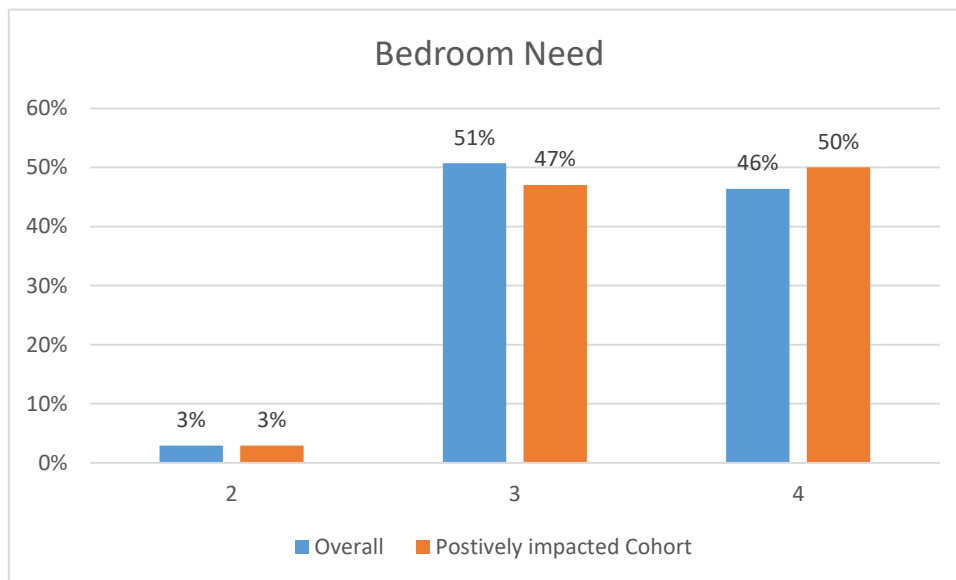
![Brent logo]

## SECTION B – IMPACTS ANALYSIS

15. 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.

---

**Currently there are 69 households who need a transfer due to over-crowding, currently awaiting social housing on our choice based letting system. According to our data the maximisation of our stock would positively affect 34 of these households of various bedroom sizes (49% of those currently in overcrowding).**

**This is due to there currently being 34 who have been waiting for a property of their reported bedroom need over the average waiting time.**

**The profiles below show the overall cohort (blue bars – total count 69) compare to the benefiting cohort (orange bars – total count 34).**

**Bedroom Need**

| Bedroom Need | Overall | Postively impacted Cohort |
|---|---|---|
| 2 | 3% | 3% |
| 3 | 51% | 47% |
| 4 | 46% | 50% |

**As expected, those in overcrowding are awaiting properties with larger bedrooms; 97% are awaiting 3 and 4 bedroom properties. The overall chort is has a 51% need for 3 bedroom properties (51%), however those awaiting 4 bedrooms should benefit proportionately more from stock maximisation if both 3 and 4 bedroom properties are vailable in the same proportion.**

**Applicant Children**
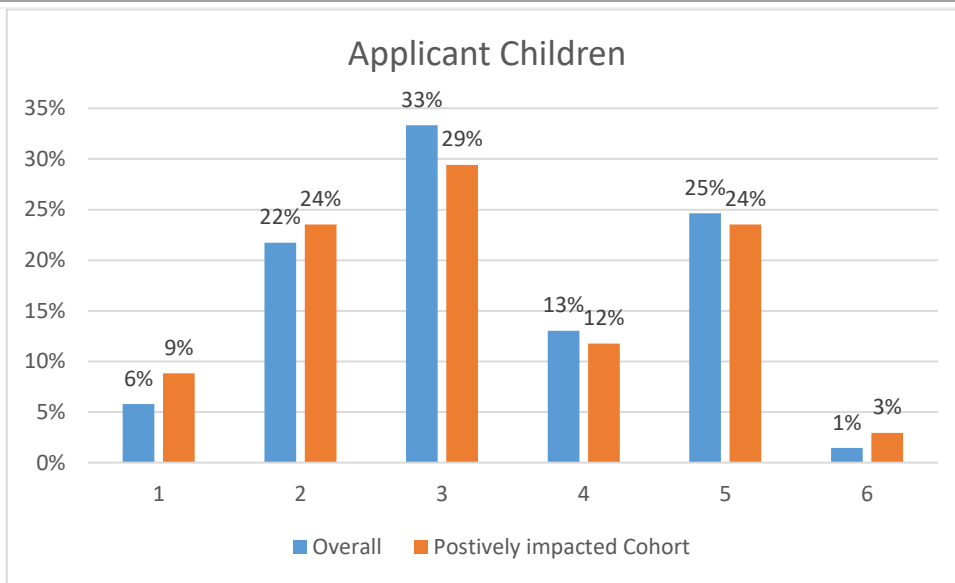
**All the applicants in over-crowding have children although the dependent data is not sufficiently populated, however this gives an indication that bedroom need is likely to be based on those with families. Those with 1 or 6 children are in the oositive benefiting cohort, howver both profiles are similar.**

16. 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**
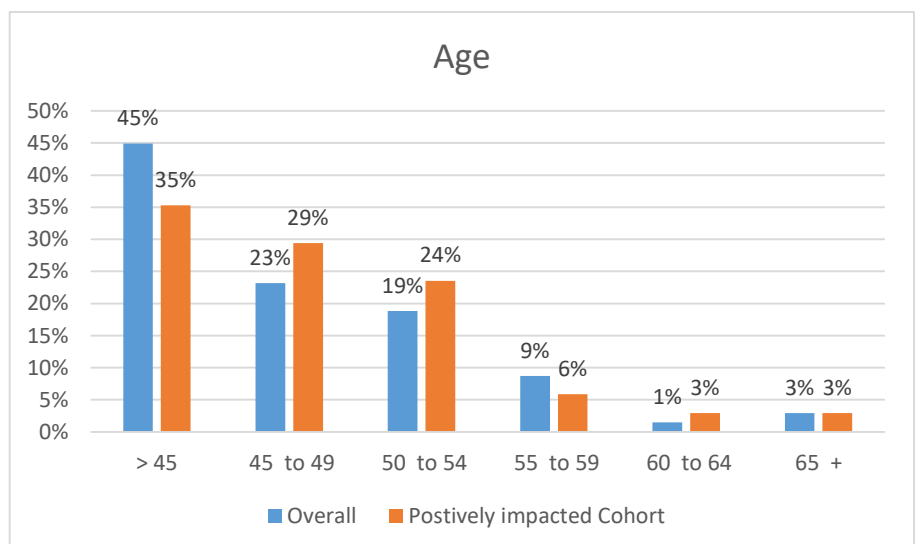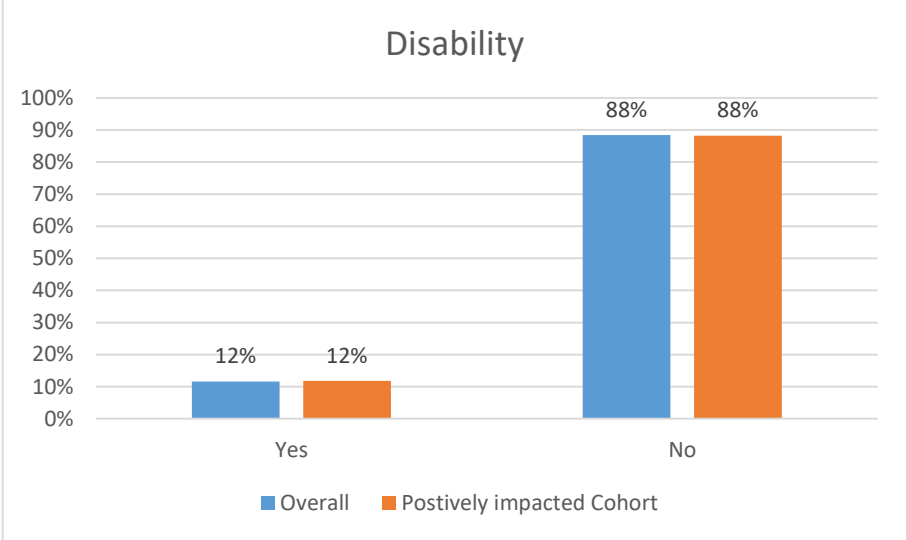
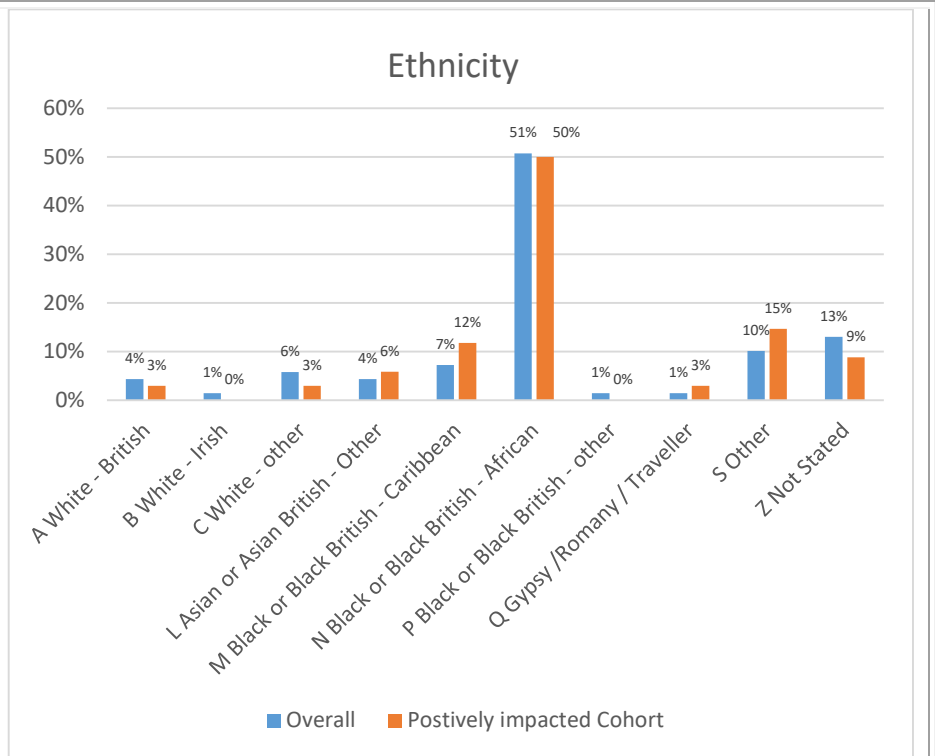| Details of impacts identified | |
|---|---|
| |  |
| | **The age range of our overall applicants in overcrowding is generally a relatively younger profile. Below 54 years of age, 87% (60 out of 69). A large proportion of this is under the age of 45, which makes up 45% (31 out of 69).** |

| | Those age 45 to 54 and 60 to 64 should benefit proptionately more from stock maximisation, however both profiles are very similar. |
|---|---|

## DISABILITY

| Details of impacts identified | 

In households with disability data, 12% of the households are disabled. Similarly, 12% are disabled in the benefiting cohort of the under occupying.

The representation of households with disabilities in both cohorts is almost equal in both cohorts. This is slightly higher than the percentage of disabled people in the Brent population, which is 14.4%. |
|---|---|

## RACE

| Details of impacts identified | |
|---|---|

**Brent**

## Ethnicity



**Of the confirmed ethnicities (68) within our overcrowded applicants, 68% of the cohort are black (41 applicants). This is also consistent in our identified cohort of those who will be positively affected by stock maximisation, totalling to 68% (21) of confirmed ethnicities; identified as positively benefitting from this policy change (34).**
**By ethnicity the profile is similar in both the overall and benefiting cohort.**

## SEX

| **Details of impacts identified** | |
|---|---|

### Sex
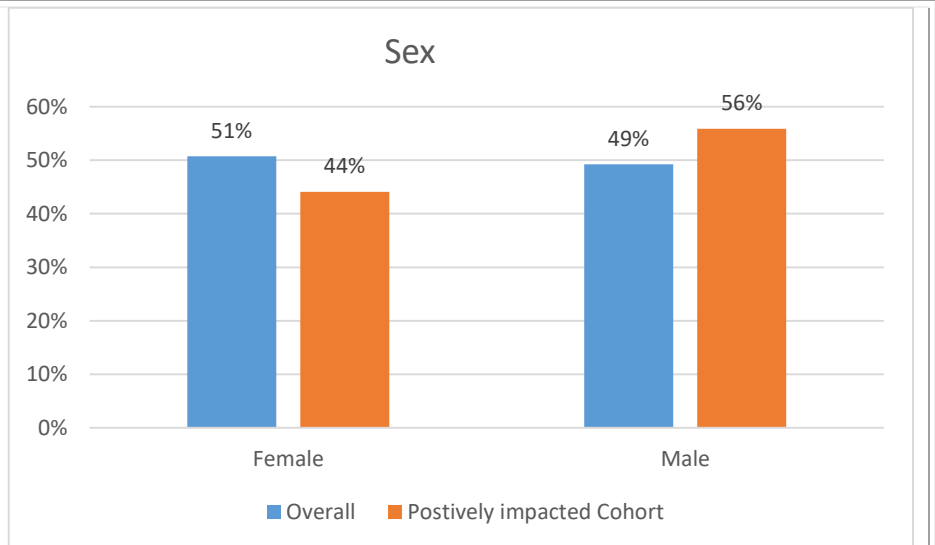
| | The gender split is fairly even in both cohorts. We would expect female applicants to make up make up a larger proportion of the cohort due to multiple reasons such maternal parenting. A larger proportion of males are in the benefiting cohort. |
|---|---|

## SEXUAL ORIENTATION

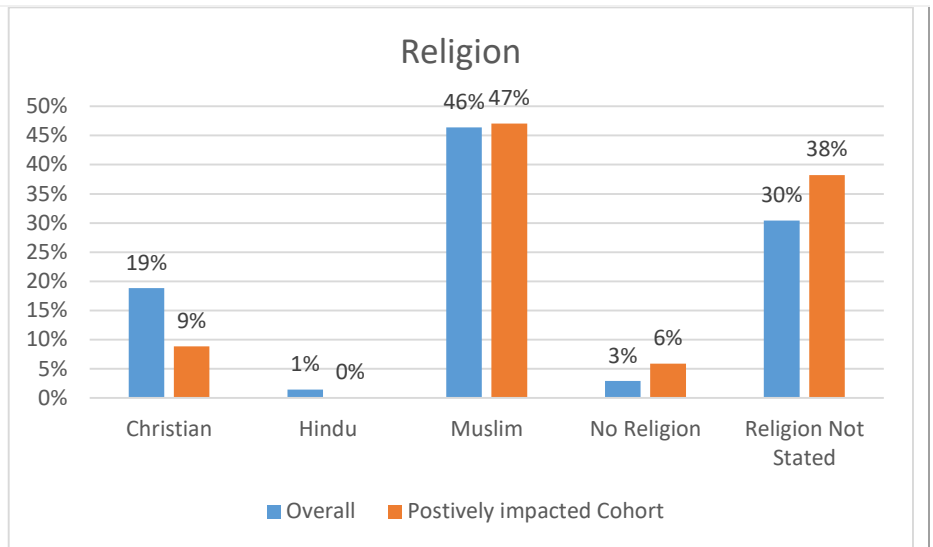| Details of impacts identified | There is insufficient data regarding sexual orientation of the households on the under occupying list to assess the impact on these groups. We do not however consider there to be any adverse impacts on this group. |
|---|---|

## PREGANCY AND MATERNITY

| Details of impacts identified | |
|---|---|
| |  |
| | Of the 69 applicants on the over-crowding list, 21% are detailed as maternity/pregnant. The profile is similar in the benefiting cohort.

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

| Details of impacts identified | |
|---|---|
| | 

The chart above shows a fairly similar profile for in the ethnic make up of the two cohorts. There are a larger number of unknowns in the benefiting cohort and a lower proportion of Christians. |

## GENDER REASSIGNMENT

| Details of impacts identified | |
|---|---|
| | There is insufficient data regarding gender reassignment of the 69 households on the under occupying list. Subseqently, none of the 34 benefiting cohort had data available on gender reassignment.

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 chorts in the under occupying list and the matched cohort. |

## MARRIAGE & CIVIL PARTNERSHIP

![Brent logo]
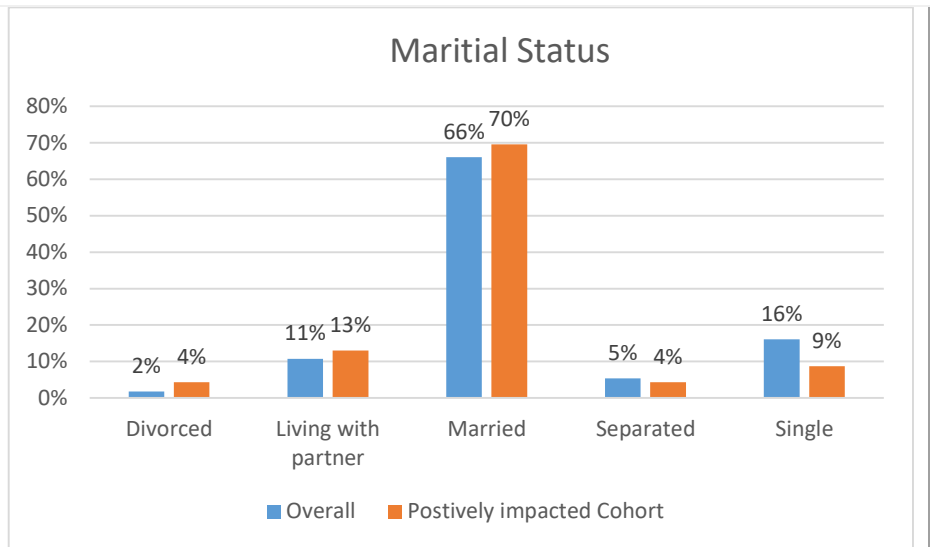
| Details of impacts identified |  Maritial Status |
| --- | --- |
| | There is no major impact by maritial status. Both the overall and benefiting cohort are generally of a similar profile. There are less single applicant in the benefiting cohort. |

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

No

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

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

None

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

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

## 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.

Over crowding is an area the that the Council is actively working on including considering how better use might be made of existing stock in particular identifying current tenants whose needs can be better met by moving to more appropriate accommodation.

Age: The profile of those in overcrowding **is generally a relatively younger profile. Below 54 years of age, 87% (60 out of 69). A large proportion of this is under the age of 45, which makes up 45% (31 out of 69). All these applicants are recorded as having children within the data and these applicants are likely to be those of families, hence the greater bedroom need.**

Sex: The gender split is farily even across both cohorts with a slightly higher proportion of males in the benefiting cohort.

Race: There is similar race profile in both the overall cohort and the benefiting cohort. In both the overall and the benefiting cohort, blacks make up 68%.

## SECTION D – RESULT

*Please select one of the following options. Mark with an "X".*

| A | CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED | |
|---|---|---|
| B | JUSTIFY AND CONTINUE THE POLICY/PROPOSAL | |
| C | CHANGE / ADJUST THE POLICY/PROPOSAL | |
| D | STOP OR ABANDON THE POLICY/PROPOSAL | |

## SECTION E - ACTION PLAN

**Brent**

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 |
|---|---|---|---|
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |
|  |  |  |  |

**SECTION F – SIGN OFF**

Please ensure this section is signed and dated.

| | |
|---|---|
| **OFFICER:** | |
| **REVIEWING OFFICER:** | |
| **HEAD OF SERVICE / Operational Director:** | |