

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Give reasonable preference to homeless households
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.

Homeless households are included in the statutory reasonable preference categories as set out in the Act. Currently, all homeless households are given reasonable preference, by being placed in Priority Band C, once the main duty has been accepted under homelessness legislation. However, under the Act the Council is also required to give reasonable preference to all homeless households, irrespective of whether the main duty has been accepted. This cohort includes those households who are owed a 56 day relief duty under the Homelessness Reduction Act 2017, households who do not have a priority need, or are intentionally homeless; as defined by homelessness legislation, or have refused an offer of suitable accommodation. It is therefore proposed that all homeless households, as specified above, are placed into Priority Band C.

The following are the duty accepted categories:

Duty to prevent homelessness: The team support families who are at risk of losing their home as soon as they are threatened with homelessness within 56 days, by helping them to remain in their current accommodation, if the property is suitable to continue to occupy.

Duty to take steps to relieve homelessness: This duty is triggered when a family are already homeless. The team provide advice and assistance to help people find suitable accommodation in the private rented sector for themselves and their families. Families are supported to find their own accommodation, and if it is suitable, and affordable, will pay the owner an incentive payment, to secure the property.

The Main Housing Duty: After 56 days, the relief duty comes to an end if the family have not been able to secure alternative accommodation. The team will then assess whether or not the main housing duty (under the Housing Act 1996) is triggered. The main housing duty is owed to those families who remain homeless after the relief duty, are in priority need and have not made themselves intentionally homeless. The Council will be under a duty to secure suitable accommodation, which is likely to be in the private rented sector.

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

It is envisaged that many of these households will have their homelessness relieved through private sector accommodation offers made during the relief duty. When homelessness is not relieved, and the Council does not accept the main duty, the applicant will remain in Priority Band C, as long as they fulfil the five year residence criteria. However, the Locata system used to manage the Housing Register already has built-in functionality that gives this cohort of homeless households a lower priority than those households in Band C to whom the Council has accepted the main duty. This means although this new cohort have a reasonable preference and will be able to bid on LOCATA there will not be an impact on homeless households to whom the Council has accepted the main duty, as they will have a higher priority.

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 <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	

If you have answered YES to ANY of the above, then proceed to section B.

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

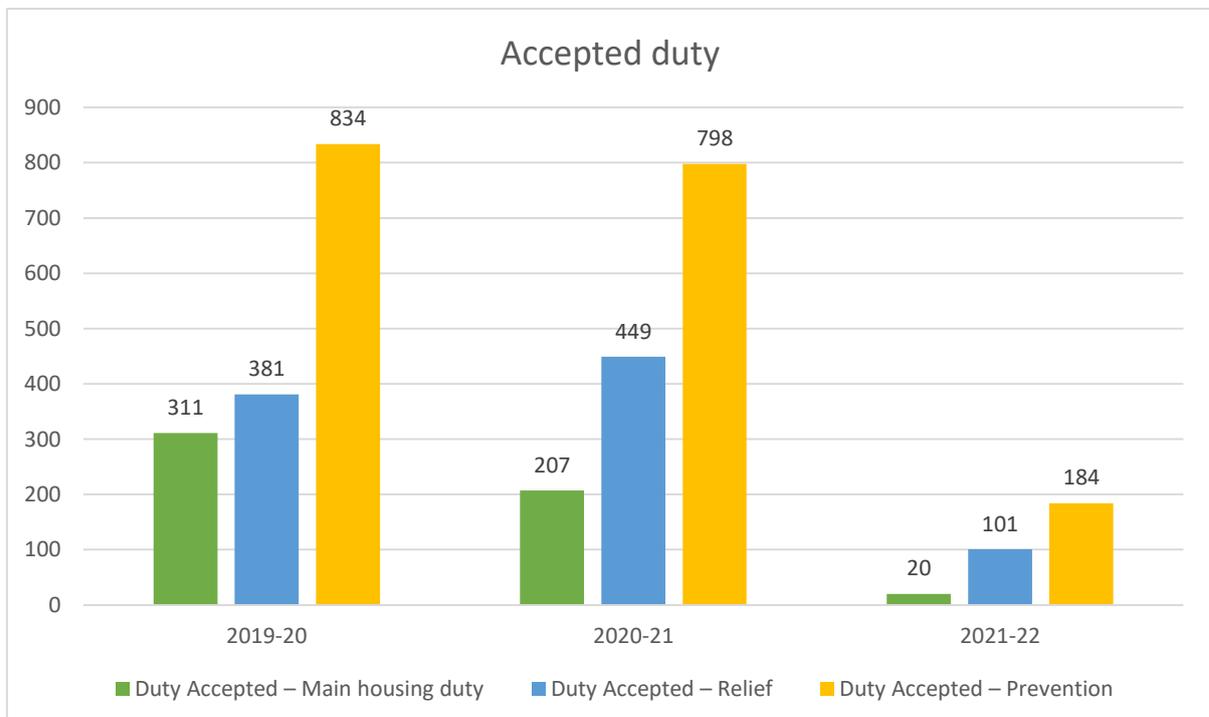
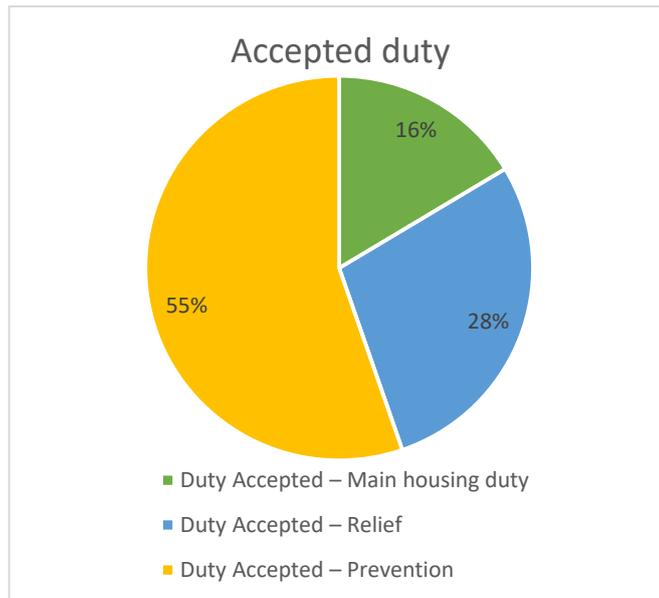
SECTION B – IMPACTS ANALYSIS

- Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

From 1st April 2019 to 31st July 2021, the number of duties accepted are 3,285. Of these, the number of main housing duties accepted are 538 (16%) and the remaining in the accepted duty are 2,747 (84%).

Of these 84%, the number of duties in the prevention stage are 1,816 (55%) and the number of duties in the relief stage are 931 (28%).

Year of application	Duty Accepted – Main housing duty	Duty Accepted – Relief	Duty Accepted – Prevention	Total
2019-20	311	381	834	1526
2020-21	207	449	798	1454
2021-22	20	101	184	305
Total	538	931	1816	3285
	16%	28%	55%	100%
		84%		



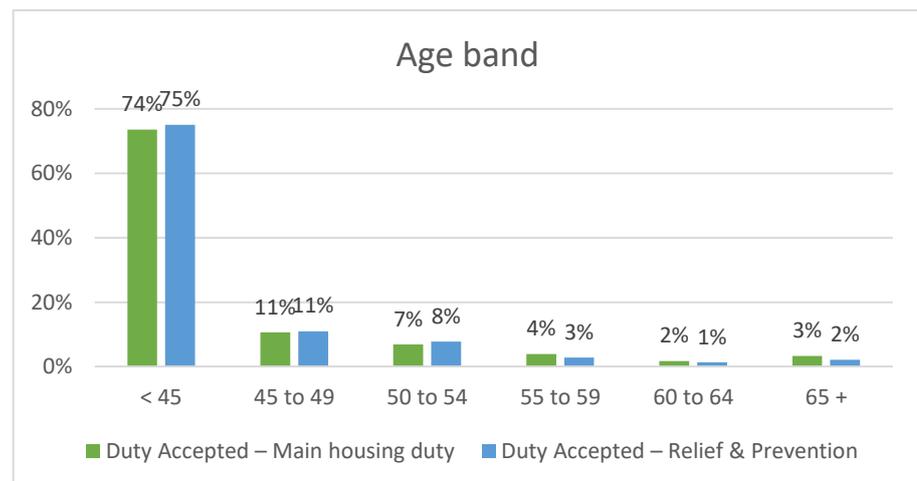
The charts below compare the main housing duty (green bars) to the relief and prevention duty (blue bars). Overall the profiles are reasonably similar.

- 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 young age. Under age 45 years make up around three-quarters of this profile and are over represented compared to brents population. The profiles are infact very similar for those with duty accepted in the relief and prevention category compared to the main housing category. The under 45s and 50 to 54 age group is over represented in the relief and prevention category by only 1 percent.



DISABILITY

Details of impacts identified

The disability proportion is around 0.2%. The presence of disability in both cohorts is much less 14% in the wider Brent population.

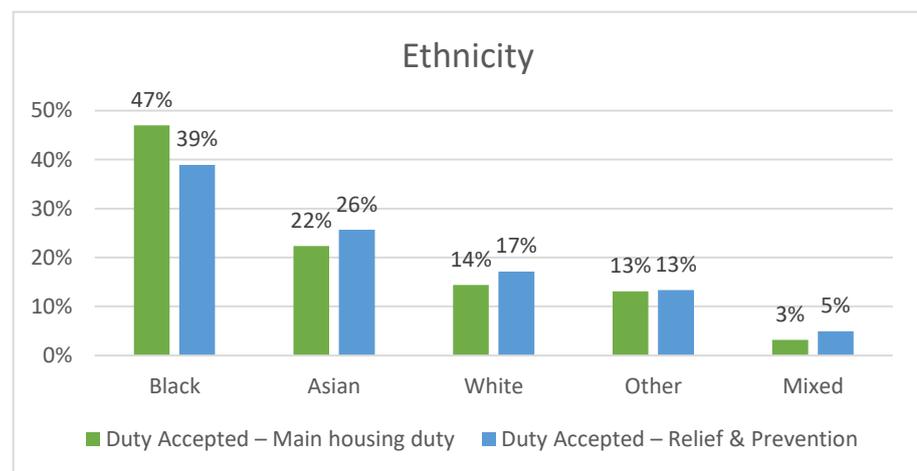
We believe the low presence of diability is likely to be a lack of data collection on this charctastic. In the relief and prevention cohort 70% of the records no have disability data completed .

	Duty Accepted – Main housing duty	Duty Accepted – Relief & Prevention	Duty Accepted – Main housing duty	Duty Accepted – Relief & Prevention
No data	33%	71%	177	1943
No	67%	29%	360	799
Yes	0.2%	0.2%	1	5
Total	100%	100%	538	2747

RACE

Details of impacts identified

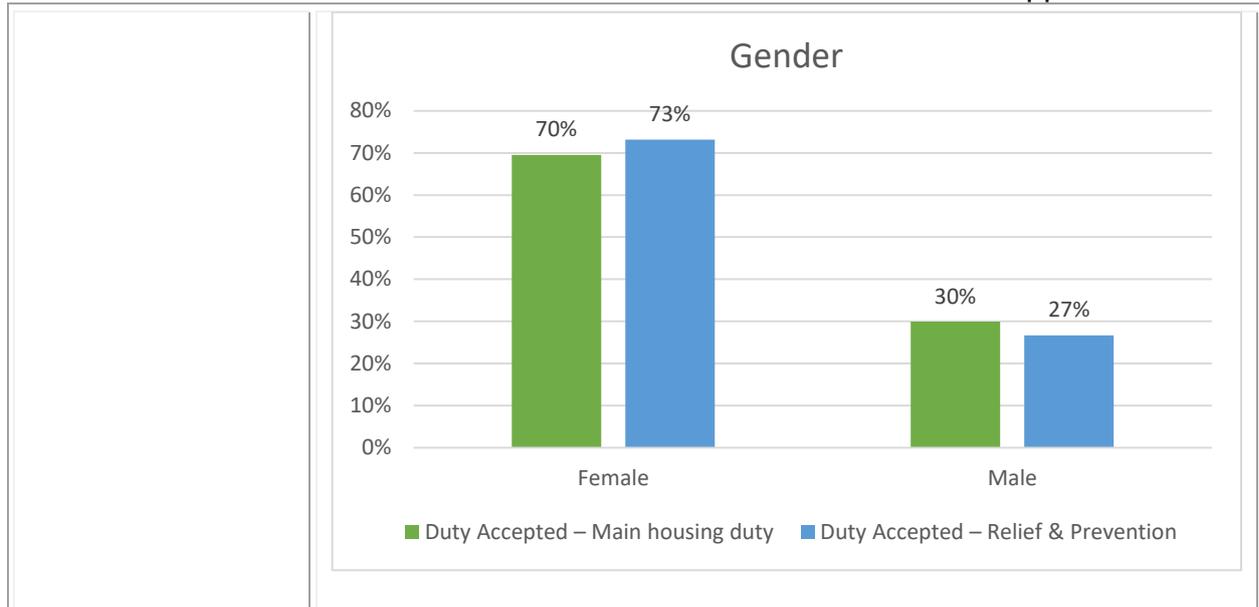
Blacks are over represented in this category, followed by Asian, White then other, then mixed. Compared to the wider Brent population, black households are over-represented in both cohorts. In Brent, black people make up 21% whereas this is 47% and 39% in both cohorts. The Asian, White and Mixed groups are over represented in the relief and prevention category by 3%-4%..



SEX

Details of impacts identified

As the graph shows, female are over-represented in both cohorts, over 70%. Females make up 49% of Brent's population. Females are also over represented in the relief and prevention category, but only by 2% to 73%. In general women are over represented in the cohorts receiving housing services due to reasons such maternal parenting, social attitudes and economic deprivation. Both profiles above are similar.



SEXUAL ORIENTATION

Details of impacts identified	Duty Accepted – Main housing duty	Duty Accepted – Relief & Prevention	Duty Accepted – Main housing duty	Duty Accepted – Relief & Prevention
	Heterosexual	84%	88%	415
Other sexual	14%	10%	70	259
Gay / Lesbian	2%	1%	9	35
Bisexual	0%	0%	1	9
Total	100%	100%	495	2473

We have limited data on this cohort therefore any numbers will not be a true representation.

PREGANCY AND MATERNITY

Details of impacts identified	
	We have limited data on this cohort therefore any numbers will not be a true representation. In addition, these are the pregnancies if declared and live at the time.

RELIGION OR BELIEF

Details of impacts identified	Duty Accepted – Main housing duty	Duty Accepted – Relief & Prevention	Duty Accepted – Main housing duty	Duty Accepted – Relief & Prevention
Not Stated	92%	96%	495	2640
Buddhist	0%	0%	0	0

Christian	3%	2%	16	45
Hindu	1%	0%	3	2
Jew	0%	0%	0	0
Muslim	4%	2%	20	49
No Religion	0%	0%	2	5
Other	0%	0%	2	6
Total	100%	100%	538	2747

We have limited data on this cohort therefore any numbers will not be a true representation. Over 90% in both cohorts have not stated their religion.

GENDER REASSIGNMENT

Details of impacts identified	We have limited data on this cohort therefore any numbers will not be a true representation.
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MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	We have limited data on this cohort therefore any numbers will not be a true representation.
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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?

We do not envisage any negative impact on the relief and prevention cohort as those in main duty will continue to have a higher priority as was previously the case.

7. 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.

The charts compare the duty accepted – main housing duty cohort, 538 (green bars) to duty accepted for relief and prevention, 2,747 (blue bars).

Age: The profile is that of a relatively younger age. Under age 45 years make up around three-quarters of this profile and are over represented compared to Brents population. The under 45s and 50 to 54 age group is over represented in the relief and prevention category by only 1 percent.

Sex: Females are over-represented in both the main housing duty cohort (70%) and the relief and prevention cohort (73%) and compared to the female population which makes up 43% in Brent. The profiles are in fact very similar for both cohorts with females representing 2% more in the relief and prevention category at 73% compared to the main housing duty category. Women are over represented in both the cohorts as expected due to reasons such as maternal parenting, social attitudes and economic deprivation.

Race: Blacks are over represented in this category, followed by Asian, White then other, then mixed. Compared to the wider Brent population, black households are over-represented in both cohorts. In Brent, black people make up 21% whereas this is 47% and 39% in both cohorts. The Asian, White and Mixed groups are over represented in the relief and prevention category by 3%-4%.

In summary, in the relief and the prevention category there is only 1% more under 45s and 50-54, 2% more females and 4% more Asian and 3% more white and 2% more mixed. We expect no impact on the relief and prevention cohort as those in main duty will continue to have a higher priority.

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:	