

EQUALITY ANALYSIS FOR PHS DRAFT STRATEGY

POLICY/PROPOSAL:	PRIVATE HOUSING SERVICES DRAFT STRATEGY
DEPARTMENT:	HOUSING SERVICES
TEAM:	PRIVATE HOUSING SERVICES
LEAD OFFICER:	TRIZA HANDA – HEAD OF SERVICE
DATE:	10 June 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.*

The Private Housing Strategy has been written to help deliver the Council's wider borough plan to Move Brent Forward Together. The strategy sets out how we will work to deliver our vision for the private housing sector in Brent, to ensure they are a safe, stable, and accessible housing option for our residents.

This strategy examines how we access the private sector housing stock and how we regulate standards within the sector to ensure rented properties are well managed and maintained to high standards and tenancies sustained.

Neglected and vacant buildings can create a sense of insecurity and negatively impact the safety and perception of neighbourhoods when they become targets for vandalism, squatting, and other illegal activities. The strategy also considers how the Council addresses the wasted resource of empty properties, which contributes to housing shortages in Brent.

The strategy considers the importance aides, adaptations and other assistance provides in allowing elderly and vulnerable residents to continue to live at home and see improvements in both their health and wellbeing through the provision of various grants.

Objectives:

The PSH strategy proposes 3 overarching commitments, with actions that are required to ensure effective delivery.

The commitments and actions, that can be found in *Appendix 3-the Draft Action Delivery Plan*, have been developed following extensive consultation with our stakeholders, with some actions developed directly as a result of that consultation. Details on the result of that consultation is attached in *Appendix 2 Consultation feedback*. Each commitments have actions that will ensure its delivery and targets that will be monitored by performance indicators.

The 3 commitments are.

1. We work to increase the supply of private sector homes available in Brent, so it is an accessible housing option for our residents.
2. We effectively tackle poor property conditions across the private sector in Brent.
3. We prioritise supporting residents to access and stay in their private-sector home, living safe and comfortable lives.

Intended outcome:

The strategy priorities a resident-centred approach to providing services, and when delivered, will ensure a safe, stable, and accessible private housing sector in Brent.

- By focusing on increasing the range and supply of homes available in the private sector across Brent, more people who need a home will be able to access one that meets their needs.
- Tackling poor property conditions and challenging under-performing landlords in the borough will ensure the safety of residents and improve their health and wellbeing within their home.
- Providing advice, guidance and support to private sector residents will empower them to know their rights, obligations and so manage their tenancies confidently.
- Greater focus on the support available for disabled and vulnerable residents will also enable more people to remain living independently in their home for longer.

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

We anticipate that that majority of our residents will be positively affected by the proposals within the strategy.

Tenants and Residents of Privately owned homes:

- Overall, tenants will benefit from an improvement of their living conditions and better standards of property management.
- The property licensing system has a process for eliminating discriminatory practices by landlords and property managers. Tenants will also feel empowered through the information and support that the Council is able to provide and will report poor conditions or able to take their own actions as may be appropriate.
- Occupiers of privately owned properties will be able to access services more easily and benefit from a wide range of support that is available for them to continue to live in their own homes for as long as they would like to.

Landlords and property managers:

- The proposed engagement with local landlords, which includes offering training and promoting accreditation opportunities will be beneficial landlords and those who manage properties in Brent.
- Tackling empty properties will benefit both residents, as well the owners of those properties who may sometimes lack resources to help bring the properties back to good use.

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, as explained below:

- **Equality Duty:** The Private Sector Housing Strategy, seeks to provide a safe, stable, and secure accommodation to all residents. The strategy contributes to the Council's equality objectives to ensure that all our current and future residents, staff and stakeholders are treated fairly and receive appropriate services and equal opportunities regardless of their protected characteristics (age, disability, ethnicity (including nationality), gender, gender identity and expression, marital / civil partnership status, pregnancy / maternity, religion or belief, sexual orientation), childcare and/or caring responsibilities, health and income status.

The work that is already underway to build new partnerships and strengthen the existing ones, will improve access to services to residents. We are also proposing to reach more residents through the landlord & tenant engagement programmes that we have already started, as well as promoting more widely, our adaptation services.

Further to the above, the associated strategies such as *Borough-wide selective licensing scheme* undertook a full EIA and considered the population of the whole borough.

- **The Council's Diversity and Inclusion** strategy aims to place Brent's communities, businesses, and workforce at the heart of everything we do, and to tackle inequalities and support individuals and families to reach their full potential.

The strategy proposes to priorities a resident-centred approach to providing services. The proposals in the strategy are a response to the views and desires of residents, including business communities, whom we consulted during the development of the strategy. The teams that will deliver the proposals in the draft strategy are diverse and have been equipped with resources they need to deliver the objectives within the strategy.

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

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 evidence that has been used to draft the strategy has been taken mainly from the consultation done during application for borough-wide selective licensing application. This was one of the most recent surveys taken by the Council which looked at the whole of Brent's private sector and reported on the condition of PRS, demographics of renters and issues that affected them the most at home. The relevant reports used for this analysis is presented as:

- **Licensing Consultation Report:** This involved consultation with residents, local businesses, landlords, managing agents and other stakeholder over a 12-week period. The survey found general support, across all groups for licensing as an efficient way of improving property conditions. There was also agreement, that previous similar schemes in the borough had improved matters with regards to waste reduction and the support given to landlords.

- **Brent's EIA for Selective Licensing:** This exercise was undertaken to examine the impact of introducing licensing scheme covering the whole borough.
- **Private Rented Sector Stock Modelling Report 2022-** This report examined the state of Brent's housing stock and undertook a detailed review across the borough to assess housing stressors relating to key tenures, particularly within the private rented sector.
- **PHS Draft Strategy Consultation Feedback Summary– Appendix 3:** Offered views of our residents and all stakeholders on the proposed commitments and effectiveness of the proposed actions to deliver the strategy.

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

<p>Details of impacts identified</p>	<p>According to Brent's 2021 Census, there has been an increase of 20.9% in people aged 65 years and over, an increase of 9.2% in people aged 15 to 64 years, and an increase of 2.8% in children aged under 15 years. These figures are expected to grow.</p> <p>The proposal made in the draft strategy is intended to enhance housing management standards in the private sector, which will have a positive impact on all age groups.</p> <p>The proposal to widely promote our Disability Adaptations Grants, Small Works Grants and Hospital Discharge Assistance Service will provide comfort and stability for vulnerable residents of all ages.</p> <p>Residents of all ages will particularly benefit from health interventions have been proposed in the draft. Issues such as e.g., damp and mould, infections, reduction of falls as well as the requirements around excess cold, which can cause or exacerbate poor health will be addressed by the proposal to tackle poor property conditions.</p>
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DISABILITY

<p>Details of impacts identified</p>	<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. Figures from the latest census of England and Wales show that 41,163 people in Brent said they had such an impairment as of March 2021; this is equivalent to 14.7% of Brent's population.</p> <p>The proposal to introduce borough-wide licensing scheme, will be beneficial in that, landlords will be more aware of their duties under the Equality Act 2010 and of the needs of disabled people. The scheme, which is expected to bring a further 40,000 rented properties</p>
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under licensing regulations, will result in property improvement as well as opportunities to provide residents with information from our partnerships, including the access to different types of Grant Facilities available for disabled residents.

RACE

Details of impacts identified

According to the latest 2021 census, the population in Brent is as follows:

White - 117,701 people or 34.6%

Asian - 111,515 people or 32.8%

Black - 59,495 people or 17.5%

Other - 33,861 people or 10.0%

Mixed - 17,249 people or 5.1%

The main aim of this draft strategy is to put the needs of our residents at the heart of what we do. The proposal to increase awareness of, and prioritise the engagement work the service does with local landlords, will offer opportunities for landlords through the training we will provide and support with their businesses.

The proposed Toolkit which all residents will be able to use, will help to inform residents of their rights and services available to them.

SEX

Details of impacts identified

There were no direct comments made in relation to sex and we do not envisage any negative impact on the draft strategy on this factor. However, one of the aims of the strategy is to tackle antisocial behaviour, including hate crime and incidents and this is likely to have a positive impact on this characteristic.

SEXUAL ORIENTATION

Details of impacts identified.

The strategy is likely to have a positive impact on someone in this category, who may be likely to experience harassment, in form of name-calling, graffiti, and criminal damage, which can cause extreme distress and fear, with people often too frightened to leave their own home.

One of the aims of the strategy is to tackle antisocial behaviour, including hate crime and incidents and this is likely to have a positive impact on this characteristic. The proposed Tenant Toolkit which will inform PRS tenants of their rights and services available to them will help high the issues and access to support services.

PREGANCY AND MATERNITY

Details of impacts identified:

The private sector plays an important role being a key source of temporary and permanent accommodation to meet it. The proposals in this strategy will play a significant role in ensuring that the sector is well managed and provides settled and decent accommodation for Brent residents.

RELIGION OR BELIEF
Details of impacts identified

There were no direct comments made in relation to religion or belief and we do not envisage any negative impact on the strategy on this factor. However, tackling antisocial behaviour, including hate crime and incidents is likely to have a positive impact on this characteristic.

GENDER REASSIGNMENT
Details of impacts identified

Brent's census 2021 found that those identifying as transgender were represented in all age groups though in general, the transgender population had a slightly younger age profile when compared to the population generally. The percentage who were transgender was highest among the 35-44 age group (1.7%) and lowest among those aged 75 and over (0.6%).

The strategy will have no direct impact on this group, however, the support system that will be provided through the partnership work proposed and the awareness of tenants rights will support equality aims for this group.

MARRIAGE & CIVIL PARTNERSHIP
Details of impacts identified

There were no direct comments made in relation to marriage & Civil Partnership, and we do not envisage any negative impact on the strategy on this factor. However, the proposal to promote the work with property owners and developers to discuss available options for their empty properties and offer Empty Property Grants which helps to provide homes for expanding population.

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?

Yes. The respondents to the consultation were diverse by area, tenure, age, and ethnicity – and so the views (taken together) were broadly representative of Brent residents and so no further engagement would be required.

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?

The proposed objectives have given KPIs that will be monitored.

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.

This analysis has concluded that, overall, the proposed commitments made in the Private Sector Housing Strategy, and the accompanying action plan that will ensure its delivery, is likely to bring benefits to all stakeholders and enhance the work that PHS already do.

The proposed commitment to effectively tackle poor property conditions across the private sector in Brent is likely to impact positively on groups with protected characteristics, particularly those who are disadvantaged and who have little or no choice but having to rent in the private sector. Licensing, which we have introduced across the borough can be extended if it can show, with good evidence the positive impact the scheme has made to residents in PRS.

The proposal to prioritise supporting residents to access and stay in their private-sector home, living safe and comfortable lives, will impact positively on all residents, not just those in PRS, and in particular, the disabled residents and vulnerable adults.

All groups will benefit from improvements in engagement, communication and signposting information between the council and other service providers who may be able to provide the required support.

we do not envisage any negative impact of the proposals on the “Equalities” characteristics of people in Brent.

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.

- **See attached Appendix 3 Brent – Private Sector Housing Strategy – Delivery Plan**

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	TRIZA HANDA
REVIEWING OFFICER:	
HEAD OF SERVICE / Operational Director:	Spencer Randolph – Director, Housing Services