

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Procurement of a Single Delivery Partner for the South Kilburn Regeneration Programme
DEPARTMENT:	Neighbourhoods and Regeneration
TEAM:	Estates Regeneration
LEAD OFFICER:	Archika Kumar
DATE:	May 2025

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.

Brent Council is proposing to procure a Single Delivery Partner (SDP) to deliver the remainder of the South Kilburn Regeneration Programme. The SDP will be responsible for constructing approximately 1,600 new homes and associated social and public infrastructure. The new approach is intended to replace the current site-by-site model with a long-term partnership to deliver high-quality affordable housing, placemaking, coordinated estate management, and social and economic regeneration.

The programme covers a diverse and economically disadvantaged area undergoing large-scale redevelopment. The SDP will deliver approximately 1,000+ new homes, a new urban park, a new primary school, public realm improvements, and affordable workspaces, replacing the fragmented site-by-site delivery model with a comprehensive approach.

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

- Existing South Kilburn residents (social tenants, leaseholders, private tenants) who may have to relocate as redevelopment works take place
- Future residents, including those from protected groups
- Children and families
- Vulnerable residents including disabled people, older adults, low-income households, lone parents, and ethnic minorities
- Council staff involved in the programme
- Voluntary and community organisations operating in South Kilburn
- Local businesses and service providers

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. The proposal directly affects residents, including those within protected groups. The policy influences access to housing, community infrastructure, and services and therefore relates to all three limbs of the public sector equality duty:

- Eliminating discrimination
- Advancing equality of opportunity
- Fostering good relations between groups

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		x
Sex	x		x
Race	x		x
Disability	x		x
Sexual orientation	x		x
Gender reassignment	x		x
Religion or belief	x		x
Pregnancy or maternity	x		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	
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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.

This Equality Analysis draws on a wide range of sources to understand the potential impacts of the proposed procurement of a Single Delivery Partner (SDP) for South Kilburn. The following key datasets and engagement outputs have been considered:

- South Kilburn Evidence of Need and Mapping
- Local Insight Profile (Local Insight, 2023)
- Stakeholder Workshop feedback (April 2024)
- Brent Equality Strategy
- Resident consultation (2016–2024): Regular engagement including ballot and Tenant Steering Group input confirms support for regeneration and concerns around disruption, placemaking, and service delivery standards.
- South Kilburn Cabinet Report (Oct 2024)
- 2016 Masterplan and SPD
- Demographic and housing data
- Social value outcomes and inclusion commitments of recent phases.
- Brent Local and Borough Plans

While this data provides a strong borough and neighbourhood-wide foundation, we recognise that it does not currently provide person-specific or household-level data for those residents who will be directly affected by the next phases of decant and relocation. This includes more granular insight on disability types, caring responsibilities, language needs, and faith or cultural practices.

To support this Equality Analysis moving forward, the council will work with Housing Needs, Adult Social Care and the Rehousing Team to cross-reference protected characteristic data of all residents scheduled for decant in the upcoming phases.

This EA will be regularly updated as the process advances and more specific data becomes available. The Regeneration Team will work closely with the EDI Team to:

- Periodically review this analysis at key project milestones
- Incorporate feedback from future engagement and needs assessments

- Present a detailed action plan

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	<p>The Local Insight Profile (2023) shows over 22% of South Kilburn residents are under 18, and 12% are aged over 65, both higher than London averages.</p> <p>The Stakeholder Workshop (2024) raised concerns about disruptions to schooling and intergenerational community spaces.</p> <p>The SK Evidence of Need Report shows older residents are often long-term tenants and may face anxiety about relocation.</p> <p>Positive: Improved quality and accessibility of housing for all age groups, including age-friendly designs. Public spaces and school facilities will support intergenerational use.</p> <p>Negative: Older adults may experience disruption to established routines, loss of social networks, and increased anxiety linked to relocation. Children and young people could experience educational disruption and loss of informal social spaces. Temporary housing during redevelopment may not be age-appropriate or designed with age-specific needs in mind (for example, play areas for children, step-free access for older people). Younger families may face additional childcare and commuting burdens during transitions.</p> <p>A more detailed understanding of household age composition will be collected via the housing profiling exercise and decant schedule, allowing for proactive planning and tailored support.</p>
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DISABILITY

Details of impacts identified	<p>The SK Mapping Report (2024) states 15.5% of residents in the regeneration area report a disability or long-term health condition.</p> <p>Stakeholder feedback pointed to concerns about losing local support networks and difficulty navigating service changes.</p> <p>Positive: New homes will be built to accessible standards; with the potential for step-free access and adapted units. Improved public</p>
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	<p>realm and inclusive parks promote accessibility. Mapping indicates 15.5% of residents have a disability—consistent design and maintenance will particularly benefit this group.</p> <p>Negative: Relocation could lead to increased isolation, reduced independence, and disruption to medical or support service access. Poor communication about accessible features or timelines could disproportionately affect this group.</p> <p>We do not yet hold full data on the types of disabilities within affected households. This will be captured in partnership with Adult Social Care, and specific relocation plans will be developed for residents with access or support requirements.</p>
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RACE

Details of impacts identified	<p>69% of South Kilburn’s residents are from Black, Asian and Minority Ethnic (BAME) groups (Local Insight 2023).</p> <p>Specific high populations include Black African, Black Caribbean, Arab, Bangladeshi and Brazilian residents.</p> <p>The Stakeholder Workshop highlighted language barriers, lack of trust in regeneration, and fear of displacement.</p> <p>The EDI Strategy notes Brent’s population has grown due to migration and that many residents speak English as a second language.</p> <p>Positive: The area is ethnically diverse. Consistent build quality, community engagement and targeted employment opportunities under SDP will help reduce inequalities. The SDP is expected to embed inclusive design and ensure culturally competent engagement.</p> <p>Negative: Residents from ethnic minorities, who may already experience systemic disadvantages, could be disproportionately affected by displacement and disruption to cultural and community support networks. Temporary relocation may lead to isolation or discrimination in unfamiliar environments. Language barriers may hinder effective communication about relocation processes, timelines, and entitlements. A lack of culturally sensitive engagement could increase mistrust in the redevelopment process.</p> <p>A breakdown of race/ethnicity in decanting households will be compiled to support proactive engagement.</p>
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SEX

Details of impacts identified	<p>The Local Insight and SK Mapping show a high proportion of lone parent households, with female-headed households disproportionately affected by poverty.</p> <p>The EDI Strategy shows Brent Council's workforce is 64% women—indicating an understanding of gendered service design.</p> <p>Stakeholder comments show that women felt unsafe in poorly lit or isolated areas and are concerned about personal safety during construction.</p> <p>Positive: Design of community infrastructure and safety-focused public realm will support women and girls. Employment and skills programmes will be inclusive. The SDP will improve the public realm and housing quality, positively impacting women and families.</p> <p>Negative: Women may face increased vulnerability as a result of relocation, and temporary housing conditions could heighten risks of harassment or lack of privacy. Men, especially younger men, may struggle with mental health impacts due to the loss of social ties and disruptions to routine.</p>
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SEXUAL ORIENTATION

Details of impacts identified	<p>The EDI Strategy reports approx. 4% of Brent's workforce identifies as LGB+, but broader local data on residents is limited.</p> <p>Workshop and engagement processes did not record strong LGBTQ+ representation or concerns, indicating potential under-engagement or lack of safe disclosure.</p> <p>Positive: Public infrastructure and community programmes will be inclusive of LGBTQ+ individuals.</p> <p>Negative: LGBTQ+ residents may feel unsafe or marginalised in temporary housing or new neighbourhoods where social attitudes may differ. Loss of established local LGBTQ+ networks or safe spaces could exacerbate isolation and mental health challenges.</p> <p>Engagement with LGBTQ+ residents has so far been limited. Targeted outreach and co-design forums will be explored with the Brent LGBTQ+ staff network and local community organisations.</p>
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PREGANCY AND MATERNITY

Details of impacts identified	<p>The SK Mapping Report and Local Insight identify high birth rates and large households.</p> <p>Children under 5 represent a significant population segment and demand for early years services is increasing.</p> <p>The Stakeholder Workshop raised issues with early years access during previous decants and concern over proximity to health services.</p> <p>Positive: New housing and community spaces will be designed to accommodate families. The programme includes community and family friendly infrastructure provision.</p> <p>Negative: Pregnant people and new parents may be affected by disruptions to healthcare access, including antenatal and postnatal care. Temporary housing may lack family-friendly features such as space for cots, prams, or safe environments for infants. Stress associated with displacement and uncertainty can negatively impact maternal health and infant wellbeing. Limited access to early years services during transition periods may also affect this group.</p> <p>Pregnancy and maternity data will be gathered via housing needs reviews and decant consultations. This will guide allocation of family-friendly units and ensure health and wellbeing services are maintained during transition.</p>
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RELIGION OR BELIEF

Details of impacts identified	<p>Brent is one of the most religiously diverse boroughs in the UK:</p> <p>39% Christian, 21% Muslim, 16% Hindu, with many smaller groups (EDI Strategy).</p> <p>South Kilburn contains multiple places of worship, some linked to ethnic communities.</p> <p>Stakeholder sessions included concerns over losing walkable access to religious facilities.</p> <p>Positive: Inclusive design of community spaces will enable multi-faith use and reflect local needs.</p> <p>Negative: Relocation could interrupt residents' access to places of worship or religious centres. If temporary accommodations are not</p>
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	located near religious centres or do not accommodate religious practices, this may lead to distress or exclusion.
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GENDER REASSIGNMENT

Details of impacts identified	<p>The EDI Strategy notes less than 1% of the council workforce identifies as transgender; data on the community is limited.</p> <p>No direct data from SK Mapping or engagement, indicating a gap in engagement or safe disclosure.</p> <p>Negative: Transgender residents may experience heightened vulnerability during relocation, particularly if placed in temporary accommodation that is not inclusive or affirming. There may be a lack of specialist support or safe spaces within temporary housing arrangements.</p> <p>As current data on this group is limited, the Regeneration team will work with the EDI team to create safe reporting mechanisms.</p>
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MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	<p>No strong patterns or risks emerge from the Local Insight or Mapping reports.</p> <p>This characteristic is not highlighted in stakeholder engagement as an area of concern.</p> <p>Neutral: No specific impact identified.</p>
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3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No unlawful impacts have been identified at this stage, based on the evidence currently available and the council's planned mitigation measures.

However, it is recognised that relocation and decanting residents—especially those from protected groups—presents a risk of indirect discrimination if it is not carefully planned, supported and communicated. For example, relocating disabled residents without accessible alternatives or failing to consider the cultural or family needs of minority ethnic or religious households could give rise to discriminatory outcomes, even if unintentional.

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

Engagement was representative during the 2016 Masterplan and 2019 ballot. However, there are gaps in engagement with some underrepresented groups, including disabled residents, LGBTQ+ individuals, non-English speakers, younger people, and faith

communities. Further engagement is required post-appointment of the Single Delivery Partner (SDP) to ensure that the delivery phase of regeneration is inclusive, responsive, and co-produced with the community. Ongoing engagement will ensure continued inclusion during the procurement process.

Emerging strategy:

Establish new thematic co-design groups (e.g. access and mobility, families and youth, green space and community) to shape delivery priorities.

Work with local schools, youth forums, SEND forums, and disability advocacy groups to involve children, young people, and disabled residents in shaping key infrastructure (e.g. school, park).

Partner with faith leaders, cultural groups and local health providers to address religious, spiritual and wellbeing needs during relocation and design.

Facilitate bilingual engagement and translated materials to ensure inclusive participation of residents who speak languages other than English.

This is an initial engagement strategy, to be finalised with the appointed SDP.

Specific engagement targets and measures of reach will be included in the Equality Monitoring Framework.

The approach will be reviewed periodically with Brent's EDI team.

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

1. Equality Data on Residents Facing Relocation

Current datasets (e.g. from the Local Insight Profile and SK Mapping) identify borough-wide and neighbourhood-level trends, but do not include specific demographic data (e.g. age, ethnicity, disability) for the residents who will be directly affected by the next phase of decant or redevelopment.

This is necessary to assess differential impacts and inform tailored mitigation (e.g. prioritisation for accessible housing, proximity to care networks, etc.).

2. Language Needs and Communication Preferences

Although borough-level figures highlight high linguistic diversity (with over 34% speaking a main language other than English), the specific language needs of South Kilburn households affected by regeneration are not yet mapped.

This data is essential to ensure engagement, relocation advice, and consultation materials are accessible to all affected households.

3. Disability Types and Access Requirements

The proportion of residents reporting a disability is known (15.5%), but there is a lack of clarity around specific needs (e.g. sensory impairments, neurodivergence, mental health, physical/mobility-related).

More granular data is needed to ensure new and interim housing meets appropriate access standards and support plans.

4. Religion and Cultural Practice Mapping

There is no area-specific information on proximity to places of worship, dietary needs, or cultural practices (e.g. prayer spaces, gender-sensitive spaces) of impacted residents.

This is important for ensuring respectful and culturally appropriate relocation and design decisions.

These data limitations reflect the fact that this is a first-stage Equality Analysis.

Data collection on the areas listed above will be undertaken in the SDP procurement and early delivery phases, and the results used to update and refine this assessment. The Regeneration Team will work in close collaboration with the EDI team, the Rehousing Team, and community partners for this purpose.

This EA will be updated and re-published with periodic reviews.

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

Any potential barriers will be mitigated through inclusive design and delivery, in alignment with the Landlord Offer and Brent's equality policies.

Some negative impacts may remain—particularly those related to temporary disruption, decant and relocation, and changes to access or support networks—even after mitigation. These are justified by:

The strategic benefits of replacing substandard housing with high-quality, energy-efficient, secure homes;

Long-term investment in infrastructure, including a new school, public park, and improved public realm;

A move to a coordinated delivery model that enables consistent quality, inclusive design, and social value.

Where residual impacts remain, they will be mitigated as far as reasonably possible and justified by the Council's duties to provide decent housing and regenerate deprived areas under housing and planning legislation.

Oversight for identifying and managing residual equalities impacts will rest with the following:

Operational Responsibility:

The Regeneration Team will ensure action plans are implemented and reviewed across housing, engagement, and design streams.

Monitoring and Challenge:

The Equality, Diversity & Inclusion (EDI) Board will review progress annually, flag emerging issues, and challenge services on inclusion performance.

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

The equality impacts of the South Kilburn SDP will be monitored through a combination of contract management, resident engagement, and strategic oversight, including:

- Regular review of rehousing outcomes and community satisfaction
- Annual review of SDP performance against equality KPIs
- Feedback from residents and Tenants Steering Group

While the detailed equality-related KPIs are currently under development, these will be finalised in advance of the appointment of the Single Delivery Partner and will form part of the tender evaluation criteria and contractual requirements. This ensures that inclusion and equity are not only embedded in delivery but also inform the selection of the successful bidder.

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 procurement of a Single Delivery Partner offers an opportunity to address existing inequalities experienced by South Kilburn residents by improving access to high-quality affordable housing, accessible public spaces, and social infrastructure. The model allows for more consistent delivery and stronger oversight of equality commitments.

While there are positive impacts associated with housing, public space, and social infrastructure improvements, there are negative impacts associated with the possible relocation of residents, and further monitoring and targeted engagement will take place to ensure that groups at risk of marginalisation are not disproportionately impacted.

These risks are not considered unlawful or unjustifiable, but they do require active mitigation. Planned measures include:

- Tailored relocation planning informed by resident characteristics and support needs
- Provision of accessible, translated, and culturally competent information and services
- A robust Equality Monitoring Framework, aligned with contract KPIs and Brent's EDI Strategy

This Equality Analysis is a first draft, completed during the pre-tender phase. It is based on area-level data, stakeholder engagement to date, and projected delivery impacts.

Further data will be collected and a more detailed action plan will be developed to produce an Equality Monitoring Framework.

The analysis will be reviewed periodically with Brent's EDI team, including formal reassessment at key project milestones.

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	X
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
Embed inclusive design and engagement in standards and social value outcomes in SDP contract, including accessibility, and equalities-sensitive delivery KPIs.	Guarantees strategic inclusion requirements are maintained and monitored throughout delivery	Design, Procurement and Regeneration Leads	Q4 2025
Monitor rehousing processes and outcomes by protected characteristic, including tracking of relocation offers, satisfaction, and equality of access.	Provides evidence of fair access to housing and services and helps identify and address systemic inequalities.	Rehousing Team	Ongoing
Map protected characteristics and support needs of residents expected to be rehoused during the next phase; use housing, adult social care, and internal data sources.	Enables tailored support, inclusive design responses, and targeted mitigation for households most at risk of adverse impacts.	Rehousing Team	Ongoing
Develop a draft Equality Monitoring Framework ,including proposed KPIs for design, rehousing, engagement, and social value; to be integrated into the ITT and contract documents	Track outcomes by group. Provides a measurable baseline for tracking and managing equality impacts throughout procurement and delivery.	Regeneration Team	Q4 2025
Conduct an annual Equality Impact Review of SDP delivery using performance data and community feedback; report to EDI and Programme Boards.	Ensures emerging risks or exclusionary patterns are addressed, and the regeneration programme remains responsive.	Regeneration Team	Annually from Q2 2027
Deliver all communication and engagement in accessible, inclusive formats (e.g. translated materials, Easy Read, visual	Ensures all residents, including non-English speakers and disabled people, can access information and exercise their rights.	Community Engagement Lead	Ongoing

tools, interpreters, in-person and digital).

This draft action plan is based on current understanding.

Actions will be further specified as resident profiling improves, engagement evolves, and contractual documents are developed. It will be reviewed and updated periodically, in collaboration with the EDI team, community partners, and key service areas.

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Luz Gonzalez Ramirez- Development Manager 05/06/2025
REVIEWING OFFICER: <i>* the manager with oversight of the project</i>	Danielle Torpey – Strategic Lead South Kilburn Regeneration
HEAD OF SERVICE / Operational Director:	<i>archika</i> Archika Kumar - Head of Estate Regeneration