

	Cabinet 17 November 2025
	Report from the Chief Executive
	Lead Member - Deputy Leader and Cabinet Member for Finance and Resources (Councillor Mili Patel)
Adopting the Socio-Economic Duty	

Wards Affected:	All
Key or Non-Key Decision:	Key
Open or Part/Fully Exempt: <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
List of Appendices:	One Appendix A: Action Tracker – Adopting the Socio-Economic Duty
Background Papers:	2024-2028 EDI Strategy, Anti-Racism Action Plan
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1.0 Executive Summary

- 1.1 This report sets out a proposal for the council to formally adopt the Socio-Economic Duty (SED) as part of its commitment to advancing equity, diversity and inclusion (EDI). Adoption of the duty would ensure that policy and programme decisions give due regard to the potential impacts on people experiencing socio-economic disadvantage. This would have the effect of adding socio-economic status to the list of characteristics considered within Equality Impact Assessments (EIAs).

2.0 Recommendation(s)

Cabinet is asked to:

- 2.1. Approve the Council's formal adoption of the socio-economic duty.

3.0 Detail

3.1 Cabinet Member Foreword

- 3.1.1 As Deputy Leader and Cabinet Member for Finance and Resources, this report marks a significant step forward in Brent Council's commitment to equity, diversity and inclusion. The proposed adoption of the Socio-Economic Duty demonstrates the Council's determination to ensure that every decision we make is informed by a clear understanding of its impact on the lives of our residents.
- 3.1.2 The adoption of the duty is a landmark milestone for our borough. It ensures that the needs of residents facing poverty or financial exclusion are central to our strategic decisions. In doing so, we are strengthening our response to the cost-of-living crisis and deepening our ability to tackle the root causes of inequality in Brent.
- 3.1.3 I would like to thank everyone who has contributed to the development of this refreshed approach, particularly the EDI team and all colleagues who provided invaluable feedback during the process. Together, we are building a fairer and more compassionate Brent, one where every resident has the opportunity to thrive.
- 3.1.4 The adoption of the SED directly ties into the Borough Plan's Priority 1: Prosperity and Stability in Brent, by embedding a requirement to consider the needs of residents experiencing socio-economic disadvantage across the council's activities. In particular, the duty will help sharpen the council's response to the cost-of-living crisis by ensuring that financial support schemes, debt advice, and welfare interventions are targeted towards those most at risk. The duty also contributes to achieving the Borough Plan's wider ambitions, for example by strengthening our ability to address the social determinants of health, recognising that low income interacts with other inequalities to drive poor outcomes.
- 3.1.5 Adopting the SED is reflected in Objective 2 of the council's 2024-2028 EDI Strategy, which commits to improving our EIA process, and exploring adoption of the SED as a mechanism for identifying and addressing disadvantage more effectively.

3.2 Background

- 3.2.1 There has been growing momentum both within the council and from external stakeholders for Brent to formally adopt the Socio-Economic Duty. This reflects a shared recognition that socio-economic disadvantage is a significant and often overlooked driver of inequality, and that adopting the duty is a vital step in our ambition to treat all groups equitably. The duty will embed a requirement to consider the impacts of decisions on residents experiencing socio-economic disadvantage, aligning with Brent's broader commitment to inclusive policymaking.

- 3.2.2 The adoption of the socio-economic duty involves the addition of socio-economic status to Equality Impact Assessment templates and guidance, which is being completed as part of the Equality Impact Assessment refresh.

3.3 Adoption of the Socio-Economic Duty

3.3.1 Brent Council has committed to adopting the Socio-Economic Duty, as stated in our EDI Strategy, and reflected in our integration of socio-economic status into the refreshed EIA guidance and template. Adopting the SED reflects a growing recognition, both locally and nationally, that systemic disadvantage often occurs along lines that are not currently reflected in legislation. The government has committed to enacting the duty, which is set out in Section 1 of the Equality Act 2010. Although Section 1 has not yet been brought into force in England, as of November 2024, [47 councils](#) including Hackney, Manchester, and Newcastle, had voluntarily adopted the duty. Brent's proposed adoption places the council alongside other forward-looking authorities, demonstrating leadership and readiness ahead of anticipated national legislation.

3.3.2 Adopting the duty means Brent will formally treat socio-economic disadvantage as a key consideration in strategic decision-making, equivalent to a protected characteristic in how it is assessed and addressed. In practice, this means officers will be expected to consider the impact of proposals on individuals and groups experiencing poverty, financial exclusion, or housing insecurity, and to reflect this in Equality Impact Assessments and service design.

3.3.3 The council's adoption of the duty is based on the principles laid out by [JustFair's 1forEquality campaign](#), which advocates for the effective enactment, implementation, and enforcement of the SED. Key principles of the campaign include:

- Promoting meaningful impact assessments that go beyond box-ticking and help decision-makers understand and mitigate socio-economic disadvantage.
- Supporting transparent and evidence-informed decision-making, using data to identify and address inequalities.
- Providing practical resources, training, and case studies to support implementation.
- Advocating for participatory approaches, including lived experience panels and community engagement, to shape fairer policies.

Further detail on the council's actions toward each of these areas can be found in Appendix A, which lays out each element and the lead team(s) responsible for progressing it.

3.3.4 Local evidence from the Joint Strategic Needs Assessment, Brent's Cost-of-Living Outcome Based Review, and the Social Progress Index all demonstrate that socio-economic inequality compounds other forms of marginalisation and

drives poorer outcomes across health, housing, education and employment. According to the [2025 English Indices of Multiple Deprivation](#), Brent's average score makes it the 41st most deprived local authority in England, with neighbourhoods like Stonebridge, Roundwood, Harlesden, Kensal Green, Dollis Hill, and Welsh Harp experiencing particularly acute disadvantage. The income deprivation affecting children index score is 58.7%, the fifth highest in the country.

- 3.3.5 According to the [Trust for London](#), poverty affects 33% of Brent residents, the seventh highest rate in London, with 12% of households in fuel poverty and over 2,400 households living in temporary accommodation. On employment, Brent's 6% unemployment rate is among the highest in London, while 17.3% of working-age residents rely on out-of-work benefits. The Social Progress Index further highlights structural barriers in areas such as housing affordability, access to healthcare, and civic participation, underscoring that socio-economic disadvantage in Brent is multidimensional and entrenched.
- 3.3.6 The adoption of the duty strengthens the council's accountability to address these disparities by ensuring that programmes designed to support residents are explicitly targeted at those most affected by deprivation. Current initiatives already provide a strong foundation. For example, Brent Works and Brent Start play a role in tackling high unemployment and low skills, offering tailored support to residents furthest from the labour market. Commissioned services such as BEAM and StepUp provide additional pathways for people facing homelessness or mental health challenges. Similarly, the Council's digital inclusion programme addresses Brent's documented digital divide, which otherwise risks compounding inequalities in access to jobs, education and essential services. On health, targeted programmes addressing obesity, diabetes and oral health are vital in tackling the borough's disproportionately high rates.
- 3.3.7 The council is also adapting community-facing services to respond to the cost-of-living crisis. Brent Hubs, in partnership with Sufra NW London, have expanded their offer as part of the new Community Wellbeing Service launched at the New Horizons Centre. This integrated model combines Brent Hubs advice and support with hot meals, wellbeing services and discounted shopping for members. By embedding the socio-economic duty, these initiatives can be better aligned with the Borough Plan priorities, ensuring that resources are consistently directed to where disadvantage is most acute and that progress is measured against the lived realities of Brent's residents.
- 3.3.8 The council is already tracking relevant actions through its 2024-2028 EDI Strategy, helping to embed the duty into existing governance. This includes monitoring the impact of the Community Wellbeing Service and using health inequality KPIs and needs assessments to understand how deprivation affects outcomes. These mechanisms will support more targeted decision-making and ensure accountability in tackling socio-economic disadvantage.
- 3.3.9 To embed the socio-economic duty across the organisation, Brent is positioning it as a shared responsibility for all staff. This means socio-economic

disadvantage will be considered in the same way as a protected characteristic when making decisions, designing services, and engaging with residents. HR is incorporating the duty into mandatory EDI training to ensure staff understand how to apply it in their roles, and Members training will reinforce leadership accountability.

3.3.10 To fulfil the requirement of the duty to collect data on residents' and service users' socio-economic background, a series of four best practice questions have been identified from the Social Mobility Commission and added to the newly developed EDI Question Bank. In addition, a question has been developed in collaboration with Research and Intelligence colleagues to help identify individuals from low-income households, which asks about means-tested benefits as a proxy for socio-economic disadvantage. In addition, officers completing Equality Impact Assessments will now be asked to draw on a range of local and national data sources (e.g. Indices of Multiple Deprivation, Brent Open Data, and internal service data) to help assess and identify actions to mitigate against socio-economic impacts.

3.3.11 Overall, the council is promoting a culture that recognises the importance and impact of adopting the SED, with the EDI strategy and Borough Plan already reflecting strong leadership commitment to tackling socio-economic disadvantage.

4.0 Stakeholder and ward member consultation and engagement

4.1 No stakeholder or ward member consultations have taken place, but internal engagement has occurred around the proposed adoption of the SED. This includes input from the EDI Board, Director Management Teams, and other internal stakeholders.

5.0 Financial Considerations

5.1 There are no financial considerations arising from this report.

6.0 Legal Considerations

6.1 Section 1 of the Equality Act was passed in 2010. To date, it has not been brought into force in England, although in April 2018 and March 2021 it was brought into force in Scotland and Wales respectively. Accordingly, public authorities may seek to voluntarily adopt the provisions of Section 1 which contain the Socio- Economic Duty alongside the existing nine protected characteristics in the Equality Act 2010.

6.2 Section 1 of the Equality Act 2010 provides that "an authority to which this section applies must, when making decisions of a strategic nature about how to exercise its functions, have due regard to the desirability of exercising them in a way that is designed to reduce the inequalities of outcome which result from socio-economic disadvantage".

- 6.3 The Explanatory Notes makes clear that Section 1 of the Equality Act 2010 requires specified public bodies, when making strategic decisions such as deciding priorities and setting objectives, to consider how their decisions might help to reduce the inequalities associated with socio-economic disadvantage. Such inequalities could include inequalities in education, health, housing, crime rates, or other matters associated with socio-economic disadvantage. Further, that it is for public bodies subject to the duty to determine which socio-economic inequalities they are in a position to influence.
- 6.4 The duty applies to the listed public bodies, which have strategic functions – which includes Government departments, local authorities and NHS bodies. In addition, the duty applies to other public bodies which work in partnership with a local authority to draw up the sustainable community strategy for an area.
- 6.5 The duty does not require public bodies to consider how to reduce inequalities resulting from people being subject to immigration control.
- 6.6 Section 3 of the Equality Act 2010 provides that individuals have no recourse to private law because of a failure by a public body to comply with the duty imposed by Section 1. Accordingly, individuals who feel this duty has been breached, are statutorily barred from claiming damages although they are still permitted to bring a claim for Judicial Review proceedings against a public body who is covered by the duty, or if they believe the public body has not considered socio-economic disadvantage when taking decisions of a strategic nature.
- 6.7 It should be noted that where a ‘duty’ had been adopted on a voluntary basis it did not have the same standing and force as other provisions within the Equality Act 2010. The body of the report set out the steps and measures proposed to ensure processes are in place to avoid the adoption being a tick box exercise and or exposing Council decisions to challenge on the basis consideration of the SED has not been properly taken into account.

7.0 Equity, Diversity & Inclusion (EDI) Considerations

- 7.1 The Public Sector Equality Duty, as set out in section 149 of the Equality Act 2010, requires the Council, when exercising its functions, to have “due regard” to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a “protected characteristic” and those who do not share that protected characteristic. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. The council also passed a motion on November 18th, 2024, to internally recognise care experience as a protected characteristic.
- 7.2 Having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising

disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.

- 7.3 The recommendations of this report are intended to reduce inequalities of outcome for socio-economically disadvantaged residents and communities.

8.0 Climate Change and Environmental Considerations

- 8.1 There are no climate change or environmental considerations.

9.0 Communication Considerations

- 9.1 A communications plan will underpin the council's adoption of the SED, ensuring staff and Members understand its significance for decision-making and service delivery. To support this, awareness-raising activities will include updates to mandatory EDI training, refreshed intranet content, and targeted messaging.

Report sign off:

Chief Executive Kim Wright