

EQUALITY IMPACT ASSESSMENT (EIA)

POLICY/PROPOSAL:	Homelessness and Rough Sleeping Strategy 2026 – 2030
DEPARTMENT:	Housing Needs & Support
TEAM:	
LEAD OFFICER:	Laurence Coaker, Director Housing Needs & Support Grace Hall, Change & Improvement Programme Lead
DATE:	

EIA Guidance is available online, please reach out to equality@brent.gov.uk for any further support.

SECTION A – SCREENING

1. Briefly and clearly describe the policy, proposal, change, or initiative, and what it is trying to achieve.

We are reviewing and refreshing Brent's Homelessness and Rough Sleeping Strategy. Our current Strategy was first adopted in 2020, and it is now time for us to develop a new Strategy, covering the period from 2026 – 2030. It is a statutory requirement for Brent to have a Homelessness and Rough Sleeping Strategy. The Strategy will set out Brent's commitments to address homelessness, and the actions that we will take to fulfil those commitments.

The intention is that by delivering on the Strategy, we will make progress towards reducing the number of people who are homeless in the borough, and provide appropriate support to those who do become homeless.

2. Are there any groups who may be impacted by your proposal? For reference, Q4 lists all protected groups.

- Individuals and families who are homeless.
- Individuals and families who are at risk of homelessness.
- Individuals and families who are living in social housing or temporary accommodation that is provided by Brent Council.
- Partner organisations that work with Brent to address homelessness.
- Private sector landlords.

Note that within each of the groups identified above, there are likely to be protected groups who are affected.

3. If no groups are affected, explain why.

N/A

4. Mark with an “X” the potential impact of the policy or proposal on different groups. You can mark more than one box for each group.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age - People of different age groups.	X		
Care Experience - People who have been in care for any period of their childhood.	X		
Disability - People with physical, sensory, learning, and mental health disabilities, long-term conditions, and non-visible disabilities.	X		
Gender reassignment - Transgender and non-binary people, including anyone who is proposing to, started, or who has completed a process to change their gender.		X	
Marriage and Civil Partnership - Applies mainly in the workplace, people who are married or in a civil partnership.		X	
Pregnancy and Maternity - People who are pregnant, on maternity leave, or new parents.		X	
Race and Ethnicity - People of different ethnicity, nationality, and skin colour.	X		
Religion or belief - People of all faiths, and those with no religious belief.		X	

Sex - Differences between men and women, including disparities in pay, career progression, and health outcomes.	X		
Sexual Orientation - People who identify as lesbian, gay, bisexual, queer, asexual, or any other non-heterosexual identity.		X	
Socio-Economic Status – People who are experiencing poverty or socio-economic disadvantage.	X		
Other relevant groups* <i>[replace this text and specify where appropriate]</i>		x	

* Other relevant groups could include Carers, Refugees or Asylum Seekers, Veterans, among others. Review the EIA Guidance for more information.

5. Complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Does the policy or proposal have implications for eliminating discrimination, advancing equality of opportunity, or fostering good relations among different groups?	X	
Does it relate to an area with known inequalities?	X	
Would it add, change, or remove services used by any groups listed in Q4?	X	
Does it have negative or positive equality impacts on any groups listed in Q4?	X	
If you have answered YES to ANY of the above, proceed to section B. If you have answered NO to ALL the above, proceed straight to section C.		

SECTION B – IMPACTS ANALYSIS

6. What data and evidence have you used to understand potential impacts? This could include service user data where relevant. If there is little or no evidence, explain why, and note any plans to improve data collection in future, adding this to the Action Plan in Section E.

We have undertaken extensive gathering and analysis of data to understand the different groups that are affected by homelessness/the risk of homelessness, and that are supported by the council.

The refreshed Strategy will largely build on the 2020 – 2025 Strategy, which made a number of commitments and set out a number of actions to reduce the risk of people becoming homeless, and ensure that people who are homeless are provided with appropriate support.

The refreshed Strategy is likely to make new and stronger commitments around working more closely with residents with lived experience of homelessness to co-design appropriate services and support, and ensuring that residents are provided with joined-up services to help meet their complex needs and/or prevent homelessness (from happening in the first place, and where relevant, reoccurring).

7. For each characteristic:
- Provide detail for the impact listed in the response to Q4 in the left-hand box.
 - Provide data and evidence to explain how you reached your conclusion in the right-hand box.
- Relevant data sources for Brent and its residents can be found in the EIA Guidance document.

Age	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<ul style="list-style-type: none">The Strategy outlines a commitment and number of actions around working with residents with lived experience of homelessness so that we can design services to meet their needs. This will include working with residents of a range of ages.The Strategy commits to providing person-centred services, which includes providing services tailored to homeless families with children.	<ul style="list-style-type: none">Overall, the median age for homeless approaches in Brent is 35, which is also the median age in Brent as a whole.26-35 yrs are the group most likely to approach the Council as homeless.About 1/3 of recent households approaching as homeless have a dependent child.Of open cases with a full homeless application (i.e. which have been formally assessed), there are ~8500 dependent children related to homeless applications. Of all households whose homeless approach is still open, there are around ~9700 related dependent children.About $\frac{3}{4}$ of households in temporary accommodation include a dependent child. About 3500 children are living in Brent temporary accommodation.

Care Experience	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<ul style="list-style-type: none"> The Strategy outlines a commitment and number of actions around working with residents with lived experience of homelessness so that we can design services to meet their needs. This will include working with residents who have care experience. The Strategy commits to providing person-centred services, which includes providing services tailored to residents who have care experience. 	<ul style="list-style-type: none"> Brent does collect information on care experience, but it is likely that this experience remains slightly underreported, as data below represents approaches since late March 2025, when the Council shifted to a new data collection system. Since March 2025, 80 households have approached with at least one care experienced household member, with a total of 93 care experienced individuals. That represents 1.4% of approaches. The majority of all approaches are between 18 and 30 years. The majority of these approaches are single households (i.e. individual care leavers) rather than members of a family. The main reason for homelessness among such households is eviction from supported accommodation (20%).

Disability	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<ul style="list-style-type: none"> The Strategy outlines a commitment and number of actions around working with residents with lived experience of homelessness so that we can design services to meet their needs. This will include working with residents who have disabilities. The Strategy outlines a commitment to ensuring that people are provided with suitable accommodation, which includes accommodation that is appropriate for people's physical needs. 	<ul style="list-style-type: none"> Recently, about 4% of approaches include households with a learning disability, and ~13% with physical ill health or disability. (Data not yet sufficient to identify trends or stable levels). About 10% of homeless approaches are from residents whose home is no longer suitable due to ill health or disability. About 10% of households are receiving disability benefits. Discussion with residents with lived experience of homelessness + council colleagues has revealed that temporary accommodation/social housing is sometimes unsuitable for individuals with physical disabilities.

Gender Reassignment	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<ul style="list-style-type: none"> The Strategy outlines a commitment and number of actions around working with residents with lived experience of homelessness so that we can design services to meet their needs. This will include, where possible, working with residents whose gender has been reassigned. 	<ul style="list-style-type: none"> The majority of residents (57%) approaching as homeless would “Prefer not to say” if their gender is the same as the sex they were assigned at birth. 43% explicitly stated that their gender is the same as the sex they were assigned at birth. 0.85% of residents explicitly stated that their gender was not the same as the sex they were assigned at birth. This is lower than the 1.31% who so identified in the Census 2021 figures. However, the true figure could be higher than 0.85%, veiled by the large number who would “Prefer not to say”, as above. Consequently, it is difficult to ascertain whether this protect group is more likely to experiences of or risk of homelessness.

Marriage and Civil Partnership	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<ul style="list-style-type: none"> The Strategy outlines a commitment and number of actions around working with residents with lived experience of homelessness so that we can design services to meet their needs. This will include working with residents who are married or in civil partnerships. 	<ul style="list-style-type: none"> We don’t currently have any data specifically addressing the relationship status of homeless individuals.

Pregnancy and Maternity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<ul style="list-style-type: none"> The Strategy makes specific commitments around providing people with joined-up services, and advice. This should include providing homeless residents who are pregnant or have newborn children with 	<ul style="list-style-type: none"> Homelessness can particularly negatively impact pregnancy and the unborn child Since late March, ~200 approaches (~6%) have included a pregnant household member. Of open approaches since March,

access to relevant services, advice and support.	~75 continue to include a pregnant household member.
--	--

Race and Ethnicity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<ul style="list-style-type: none"> The Strategy outlines a commitment and number of actions around working with residents with lived experience of homelessness so that we can design services to meet their needs. This will include working with residents from a range of backgrounds. 	<ul style="list-style-type: none"> Residents are much more likely to experience (risk of) homelessness if they are from Black, African and/or Caribbean backgrounds. They are also more likely to experience (risk of) homelessness if they are from Arab backgrounds or other ethnic groups. White and Asian residents are less likely than residents of other ethnicities to experience homelessness or risk of homelessness.

Religion or Belief	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<ul style="list-style-type: none"> The Strategy outlines a commitment and number of actions around working with residents with lived experience of homelessness so that we can design services to meet their needs. This will include working with residents of a range of religious beliefs. 	<ul style="list-style-type: none"> Brent Council started collecting data on religious beliefs with its new digital system, Locata HPA2, as of late March 2025. To date, the data set is too small to identify certain trends, but it appears that households with Muslim religious beliefs are significantly more likely to approach as homeless (~50% of all households, vs 21% of the background population (2021 Census)).

Sex	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<ul style="list-style-type: none"> The Strategy outlines a commitment and number of actions around working with residents with lived experience of homelessness so that we can design services 	<ul style="list-style-type: none"> Men are more likely to approach the council as a single homeless resident, while women are more likely to approach the council on behalf of a homeless family

to meet their needs. This will include working with men and women.	<ul style="list-style-type: none"> Overall, there are slightly more women than men approaching the council as homeless. 8% of people who made a homeless application last year did so because of domestic abuse. We offer specific homelessness support and advisory services for victims of domestic abuse.
--	---

Sexual Orientation	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<ul style="list-style-type: none"> The Strategy outlines a commitment and number of actions around working with residents with lived experience of homelessness so that we can design services to meet their needs. This will include working with residents of a range of sexual orientations. The Strategy continues our existing commitments of providing tailored services to residents who are victims of domestic abuse. 	<ul style="list-style-type: none"> 5.6% of recent homeless approaches identified as gay, lesbian, bisexual or other sexual orientation – higher than the 3.2% of adults who identify as such in Brent in general.

Socio-Economic Status	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
<ul style="list-style-type: none"> The Strategy is underpinned by recognition that homelessness impacts on people's socio-economic status and makes a number of commitments around providing people with holistic and integrated support and advice to support better socio-economic outcomes. Households experiencing or at risk of homeless are more likely to be unemployed, underemployed or to be employed in a manner that may be considered socioeconomically disadvantageous. They are also more likely to be in receipt of benefits. 	<ul style="list-style-type: none"> Households experiencing or at risk of homelessness are more likely to be unemployed or underemployed, and are also more likely to be in receipt of benefits. The recently released Indices of Multiple Deprivation (IMD) 2025 show that Brent is the local area in England with the most LSOAs in the most deprived 10% nationally for barriers to housing and services. In absolute terms, it is the second highest in England and the highest in London. This is driven by sub-indicators related to housing affordability and overcrowding. Housing in Brent is the second least affordable in the country, and the third most overcrowded.

	<ul style="list-style-type: none"> • Since April 2025, the most common employment status of the main applicant is not working because of long term sickness or disability (22%), registered unemployed (20%), working 30 hours+ (14%), working less than 30 hours (12%). About 60% of main homelessness applicants are not working. • Since April 2025, for housing costs, 45% are receiving Universal Credit, 27% no benefits, and 8% housing benefit.
--	---

Other Relevant Groups	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
None identified	None identified

8. Summarise any engagement activities with relevant groups (this may replicate some of the information listed in Q7). State whether those involved represent the people affected by your proposal, or whether more engagement is needed, which should be added to the Action Plan in Section E.

<p>To develop the Homelessness and Rough Sleeping Strategy we have engaged with a range of residents, including residents with lived experience of homelessness.</p> <p>Our engagement has shown that:</p> <ul style="list-style-type: none"> • Younger respondents (20–39) tended to push for long term solutions like building more homes and rent caps. • Older respondents (50+) tended to raise concerns about immediate relief and reducing antisocial behaviour. • Ethnic minority groups: Some highlighted barriers and the need for culturally sensitive or targeted support. • Disabled respondents: Called for inclusive housing design and better communication.
--

9. Provide more detail on any areas identified as requiring further data or detailed analysis.

Officers will continue to engage with residents with lived experience of homelessness from a range of protected groups as work to deliver the Strategy progresses. This will help to ensure that the Council is delivering on its commitments to design and deliver services in ways that meet the needs of different protected groups.

SECTION C – CONCLUSIONS

10. Summarise your overall conclusions based on the analysis:

- If there are no impacts, state that here, and **do not complete sections E or G**.
- If you decide not to move forward, explain why, and **do not complete sections E or G**.
- If there are negative impacts, explain what you'll do to reduce them. If you choose to continue despite negative impacts, or if negative impacts remain following your action plan, provide a justification for your decision.
- If there are positive impacts, explain how these could be strengthened, where possible.

It is appropriate for this policy/work to proceed. It is, in many ways, designed to ensure that appropriate arrangements are in place to provide support/advice to people with protected characteristics. Appropriate arrangements are being put in place to ensure that people with a wide range of lived experiences of homelessness/risk of homelessness are given opportunity to feed into the development of the Strategy.

SECTION D - RESULT

Select one of the following options 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 AND MONITORING

Unless your proposal has no equality impacts or you are not moving forward, complete the table below to track specific actions to:

- Reduce negative impacts and increase positive outcomes.
- Monitor actual or ongoing impacts.
- Record plans to improve data collection.
- Plan any further engagement or analysis that may be required.

Use the 'Status' column on the right to indicate whether the action is yet to start, is in progress, or has been completed.

Issue Identified	Action	Lead Officer	Completion Date	Status
Ensuring that services meet needs of residents with lived experience of homelessness – including different protected groups	Ongoing engagement with residents with lived experience of homelessness, including from a range of protected groups, and tailoring services based on their feedback. Details of ongoing engagement will be worked out following the adoption of the Strategy and included in subsequent reviews of this EA.	Laurence Coaker, Zorba Emelonye and Komal Samra	Ongoing – and for the duration of the Strategy (2026 – 2031)	Underway
Need for improved data on homelessness and how it is affecting different protected groups	Ongoing analysis of data and identification of areas where improvements in data collection are needed.	Laurence Coaker, Jamie Slagel	Ongoing	Underway
Need to ensure that the Council is delivering on its commitments in the Strategy	Regular engagement with Brent's Homelessness Forum, partner organisations and residents with lived experience of homelessness to monitor progress and identify areas for further work/improvement.	Laurence Coaker, Grace Hall	For the duration of the Strategy (2026 – 2031)	To begin

11. Describe how you will monitor the actual, ongoing impact of the policy or proposal?

- Regular project team meetings to oversee the development of the refreshed Strategy.
- Governance oversight via CMT, PCG and Cabinet.
- Ongoing review of progress on the adopted Strategy via the Council's Preventing Homelessness Steering Group + Brent Homelessness Forum.
- Ongoing engagement with residents with lived experience of homelessness.

SECTION F – SIGN OFF

	Signature	Date
Officer:		
Reviewing Officer or Head of Service		

SECTION G – REVIEW

EIAs are live documents and should be reviewed regularly, especially if there are actions still to be completed or if the proposal has significant equality impacts.

When to review

- Review every 6 months until all actions in the Action Plan above are complete.
- If new data, feedback, or changes to the service arise, revisit the EIA to make sure it's still accurate.

Who should review

- The same officer who completed the EIA should carry out the review. If there's been a staffing change, the new lead officer should take over.

What to update

- Use the Status column in the Action Plan above to show progress (e.g. Not Started, In Progress, Completed). Add comments and updates in the table below — include any new data, evidence, or feedback.

When reviews can stop

- Once all actions are complete and no further equality impacts are expected, you can stop reviewing the EIA.
- Add rows to the table below as necessary until all actions are completed.

<u>Date of 1st Review:</u>	
Officer:	

Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	
<u>Date of 2nd Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	
<u>Date of 3rd Review:</u>	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	