

EQUALITY IMPACT ASSESSMENT (EIA)

POLICY/PROPOSAL:	Succession and Assignment Policy
DEPARTMENT:	Service Reform and Strategy
TEAM:	Policy, EDI and Performance
LEAD OFFICER:	Andrew Phillips
DATE:	8 June 2026

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.

This policy sets out the housing services approach to the administration of tenancy successions, assignments, and the granting of discretionary tenancies for secure and introductory tenants.

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

The policy will affect all groups, and it requires officers to tailor their approach to each individual case and take into account intersectionality and protected characteristics.

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>			
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* 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.

As part of the policy making process, the council is undertaking consultation with tenants and leaseholders to understand if any parts of the policy need to be improved or made clearer.

Service user data is collected via the council's usual interactions with tenants and leaseholders, and wider views on Tenant satisfaction is collected through the Tenant Satisfaction Measures Survey, which could in the future involve more questions on the Succession and Assignment process to improve data collection.

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.
The policy applies to all adult residents who match the 'Qualified Persons' criteria outlined in the policy. However, younger residents may not qualify for succession despite having lived in a home for a significant period, though housing options support is offered to help mitigate that risk.	Succession rights in a council or housing association tenancy - Shelter England

Care Experience	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.

There are no negative impacts for residents who have been in care as a result of the policy. However, younger household members, including carers, may not qualify for succession despite having lived in the property for a significant period. Advice and housing options support are offered to affected household members to reduce the risk of hardship.	
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Disability	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy acknowledges that residents with disabilities sometimes require adapted homes, and any disabled tenants will continue to have access to this support as part of the policy.	

Gender Reassignment	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
Individuals who have undergone gender reassignment will be treated fairly and equitably under the 'Qualified Persons' criteria set out in the policy.	Succession rights in a council or housing association tenancy - Shelter England

Marriage and Civil Partnership	
	Provide supporting data and evidence.
Marriage and Civil Partnership are both classified as 'close family members' under the legislation that underpins the council's policy, meaning there are no adverse impacts.	Succession rights in a council or housing association tenancy - Shelter England

Pregnancy and Maternity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
There are no impacts on individuals who are pregnant. All applications will be treated equally, in line with best practice guidance, outlined in the 'Qualified Persons' section of the policy.	

Race and Ethnicity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
In some communities, extended or multigenerational households are more common, which may increase the likelihood that long-term household members do not hold formal tenancy rights. To help mitigate this, The Council provides clear, accessible information about succession and assignment rights and encourages tenants to notify the Council of changes in household composition.	

Religion or Belief	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
The policy may have an indirect impact on individuals from certain faith communities where extended family living arrangements, informal care roles, or non-marital partnerships are more common. In such cases, long-term household members may not meet the legal or policy criteria for succession or assignment, despite having a strong and established connection to the home.	

However, the policy is applied consistently and in line with statutory requirements, while ensuring decisions are made fairly and without discrimination.	
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Sex	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
There are no impacts on sex. All applications will be treated equally, in line with best practice guidance, outlined in the 'Qualified Persons' section of the policy. However, women are statistically more likely to be informal carers and may be disproportionately affected where succession rights are limited for non-tenants who have provided care.	Unpaid care by age, sex and deprivation, England and Wales - Office for National Statistics

Sexual Orientation	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
There are no impacts on sexual orientation. All applications will be treated equally, in line with best practice guidance, outlined in the 'Qualified Persons' section of the policy.	

Socio-Economic Status	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.

Households experiencing financial hardship may also face greater difficulty securing alternative accommodation if succession or assignment is not permitted, particularly given affordability pressures within the private rented sector.	
To mitigate this, the Council provides clear advice and information on succession and assignment rights and encourages tenants to notify changes in household composition at an early stage.	

Other Relevant Groups	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.

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.

A public consultation on the draft policy will run from 30 th March for 6 weeks, giving all residents, including the relevant groups listed above, the opportunity to provide their views on the policy.

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

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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.

While succession and assignment policies are designed to ensure fair and effective use of social housing, they may have potential indirect impacts on certain protected groups. These impacts are mitigated through discretionary decision-making, clear communication, reasonable adjustments, and access to housing advice and alternative accommodation pathways.

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
Lack of training and awareness from staff on Succession and Assignment policy	Commit to sharing and training staff on the new Succession and Assignment procedures, including	Andrew Phillips	08.01.26	

	awareness of equality implications			

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

SECTION F – SIGN OFF

	Signature	Date
Officer:	Andrew Phillips	08 June 2026
Reviewing Officer or Head of Service	Spencer Randolph	08 June 2026

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:	