

## APPENDIX 1

### EQUALITIES IMPACT ASSESSMENT

#### EQUALITY IMPACT ASSESSMENT (EIA)

|                         |                                                                                                                                           |
|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|
| <b>POLICY/PROPOSAL:</b> | Authority to tender framework agreement for the installation and repair of disabled facilities for council managed residential properties |
| <b>DEPARTMENT:</b>      | Residents and Housing services                                                                                                            |
| <b>TEAM:</b>            | Private Housing Services Grants Team                                                                                                      |
| <b>LEAD OFFICER:</b>    | Neil Edwards                                                                                                                              |
| <b>DATE:</b>            | 17/08/2026                                                                                                                                |

*EIA Guidance is available online, please reach out to [equality@brent.gov.uk](mailto: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.

The council report has the objectives of retendering the Contract for the installation and repair of disabled facilities within council owned residential properties. This is a mandatory service, and the last contract expires on 4 October 2026, therefore the key objective of retendering the contract is to maintain the service.

It is also proposed to use this opportunity to achieve an improvement in relation to delays and further disruption due to contractors returning after completion of a project to remedy defects adopting a “Right First Time” policy.

This will be a council-led, multi-supplier contract, where the Contractor is only required to carry out the adaptations. Private Housing Services Agency Service will be used to consult with tenants, design and manage the adaptation projects. This means that disabled Brent tenants receive the same high-quality service as Disabled Facility Grant applicants from other tenures.

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

It is expected that this proposal will have no detrimental effect on stakeholders and require no staffing changes as this will be a continuation of the current service. Service users are exclusively council tenants who have a disability and are referred to our service by health or care professionals from the council or its NHS partners, these referral pathways will continue to provide equal access in relation to all of the protected characteristics but generally the service tends to be received by older people.

Therefore, by improving the quality of service they receive, a slight positive impact is anticipated for all disabled council tenants as the new service will be more responsive and less disruptive, with a neutral impact for all other groups of council tenants.

3. If no groups are affected, explain why.

Whilst having a neutral general impact across the protected characteristics of Race, Ethnicity, Religion or Belief, Sex, Sexual Orientation, Gender Reassignment, Marriage or Civil Partnership, Pregnancy or Maternity, the proposal will predominantly have a positive impact on those council tenants with a disability and/or of aged 65 or older. This is not a change; these groups are currently over-represented in Private Housing Services' housing assistance by the definition of the service. When looking at the Diversity in Brent profile, it is notable that:

- Disability - 1 in 7 (14.4%) Brent residents say their day-to-day activities are limited due to their disability. 18% of the working population also say their day-to-day activities are limited due to their disability.
- Age - 11% of men and 12% of women in Brent are aged 65 or older.

In considering the relevance of this proposal in relation to equality, the service will continue to have a neutral impact on all protected characteristics. No indirect discriminatory effects would be expected from continuing this service and making improvements in relation to customer service. The service will continue to exercise its expertise in anticipating and meeting the needs of its disabled customers from all protected characteristics. By its nature this proposal will continue to take account of the disabilities of its customers; this is essentially what we do, and all our customers have a disability. Contractors will have to demonstrate that their operatives have had Disability Awareness training.

Tendering contractors will need to demonstrate that in all aspects of their activities as an employer and service provider, they have an established policy of operating within the spirit of the Equality Act 2010 and are promoting fairness and equality of opportunity. A minimum requirement is that no employees are to be paid below the minimum wage for London.

In terms of the council's public sector equality duty, this is a continuation of an existing service which is provided in accordance with the council's equality policies. No change is

intended or expected in this respect; flexibility will remain in the service for it to best meet the specific requirements of all groups with protected characteristics. For example, we routinely adjust our processes to accommodate the needs of those with Dementia or other impairments and provide interpretation services where they are required.

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 |
| <b>Age</b> - People of different age groups.                                                                                                                          | X        |              |          |
| <b>Care Experience</b> - People who have been in care for any period of their childhood.                                                                              |          | X            |          |
| <b>Disability</b> - People with physical, sensory, learning, and mental health disabilities, long-term conditions, and non-visible disabilities.                      | X        |              |          |
| <b>Gender reassignment</b> - Transgender and non-binary people, including anyone who is proposing to, started, or who has completed a process to change their gender. |          | X            |          |
| <b>Marriage and Civil Partnership</b> - Applies mainly in the workplace, people who are married or in a civil partnership.                                            |          | X            |          |
| <b>Pregnancy and Maternity</b> - People who are pregnant, on maternity leave, or new parents.                                                                         |          | X            |          |
| <b>Race and Ethnicity</b> - People of different                                                                                                                       |          | X            |          |

|                                                                                                                                       |  |   |  |
|---------------------------------------------------------------------------------------------------------------------------------------|--|---|--|
| ethnicity, nationality, and skin colour.                                                                                              |  |   |  |
| <b>Religion or belief -</b><br>People of all faiths, and those with no religious belief.                                              |  | X |  |
| <b>Sex -</b> Differences between men and women, including disparities in pay, career progression, and health outcomes.                |  | X |  |
| <b>Sexual Orientation -</b><br>People who identify as lesbian, gay, bisexual, queer, asexual, or any other non-heterosexual identity. |  | X |  |
| <b>Socio-Economic Status –</b> People who are experiencing poverty or socio-economic disadvantages.                                   |  | X |  |
| <b>Other relevant groups*</b><br><i>[replace this text and specify where appropriate]</i>                                             |  |   |  |

\* 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 |
| <b>Does the policy or proposal have implications for eliminating discrimination, advancing equality of opportunity, or fostering good relations among different groups?</b> | X   |    |
| <b>Does it relate to an area with known inequalities?</b>                                                                                                                   | X   |    |
| <b>Would it add, change, or remove services used by any groups listed in Q4?</b>                                                                                            |     | X  |
| <b>Does it have negative or positive equality impacts on any groups listed in Q4?</b>                                                                                       | 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.

Each customer is assigned a grant officer as their direct contact with the council, and meetings are regularly held to include discussion of any issues our customers may have, including a meeting to inspect completed projects and review contractor performance. The grant officer scores the contractor in relation to quality, time-management, safe storage of tools, waste and materials, and how well they considered and respected the customer whilst they were working in their home. Reports are regularly produced to review this data, and no relevant issues were identified in the five-year period of the current contract.

Once each project has been completed, A second, more detailed customer survey is also carried out by telephone in relation to the service the customer received from the council. If it is found that anybody may have been treated unfairly or experienced discrimination based on any of the protected characteristics, this would be investigated through the council's formal complaint process and/or disciplinary process as is relevant to the circumstances.

This new contract plans to improve data collection and on-going performance monitoring via bi-annual performance meetings held with each contractor. Regular performance monitoring will ensure that the contract does not operate in a manner that disadvantages or discriminates against any particular group.

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. |

|                                                                                                                                                                                           |                                                                                                                                                                                                                                   |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Households will not be discriminated against because of their age. The service is bespoke to meet an individual's needs to help them maintain a reasonable level of independence at home. | In the previous five years of the current contract, there have been no upheld complaints, investigations, or reports in relation to this characteristic. No relevant alerts or trends have been identified through data gathered. |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

| Care Experience                                                   |                                                                                                                                                                                                                                   |
|-------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Provide details for the impact listed in Q4.                      | Provide supporting data and evidence.                                                                                                                                                                                             |
| Households will not be discriminated against this characteristic. | In the previous five years of the current contract, there have been no upheld complaints, investigations, or reports in relation to this characteristic. No relevant alerts or trends have been identified through data gathered. |

| Disability                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                  |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Provide detail for the impact listed in Q4.                                                                                                                                                                                                                                                                                                         | Provide supporting data and evidence.                                                                                                                                                                                            |
| Households will not be discriminated against because of their disability. The service is focused on client need following an Occupational Therapy assessment. The service caters for the individual needs of every service user. The service has a positive impact as it enables disabled people to maintain their independence at home for longer. | In the previous five years of the current contract, there have been no upheld complaints, investigations or reports in relation to this characteristic. No relevant alerts or trends have been identified through data gathered. |

| Gender Reassignment                                               |                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Provide detail for the impact listed in Q4.                       | Provide supporting data and evidence.                                                                                                                                                                                            |
| Households will not be discriminated against this characteristic. | In the previous five years of the current contract, there have been no upheld complaints, investigations or reports in relation to this characteristic. No relevant alerts or trends have been identified through data gathered. |

| Marriage and Civil Partnership |
|--------------------------------|
|--------------------------------|

|                                                                   |                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Provide detail for the impact listed in Q4.                       | Provide supporting data and evidence.                                                                                                                                                                                            |
| Households will not be discriminated against this characteristic. | In the previous five years of the current contract, there have been no upheld complaints, investigations or reports in relation to this characteristic. No relevant alerts or trends have been identified through data gathered. |

### **Pregnancy and Maternity**

|                                                                                                                                                                                     |                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Provide details for the impact listed in Q4.                                                                                                                                        | Provide supporting data and evidence.                                                                                                                                                                                            |
| Households will not be discriminated against because of pregnancy and maternity. The service will meet an individual's needs to help them maintain a level of independence at home. | In the previous five years of the current contract, there have been no upheld complaints, investigations or reports in relation to this characteristic. No relevant alerts or trends have been identified through data gathered. |

### **Race and Ethnicity**

|                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                  |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Provide detail for the impact listed in Q4.                                                                                                                                                                                                                                      | Provide supporting data and evidence.                                                                                                                                                                                            |
| Households will not be discriminated against because of their race. A sensitive and flexible approach to meeting service user's needs is taken to ensure adequate and suitable provision is made. Interpreters and liaison with other services are also arranged where required. | In the previous five years of the current contract, there have been no upheld complaints, investigations or reports in relation to this characteristic. No relevant alerts or trends have been identified through data gathered. |

### **Religion or Belief**

|                                                                   |                                                                                                                                                                                                                                  |
|-------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Provide detail for the impact listed in Q4.                       | Provide supporting data and evidence.                                                                                                                                                                                            |
| Households will not be discriminated against this characteristic. | In the previous five years of the current contract, there have been no upheld complaints, investigations or reports in relation to this characteristic. No relevant alerts or trends have been identified through data gathered. |

### **Sex**

| Provide detail for the impact listed in Q4.                                                                                             | Provide supporting data and evidence.                                                                                                                                                                                             |
|-----------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| The provision of disabled facilities will have an equally positive impact on all sexes and so no negative impacts have been identified. | In the previous five years of the current contract, there have been no upheld complaints, investigations, or reports in relation to this characteristic. No relevant alerts or trends have been identified through data gathered. |

| Sexual Orientation                                                                                                                                                                                                                             |                                                                                                                                                                                                                                   |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Provide detail for the impact listed in Q4.                                                                                                                                                                                                    | Provide supporting data and evidence.                                                                                                                                                                                             |
| No negative impacts have been identified. Households will not be discriminated against because of their sexual orientation. The service will simply meet an individual's clinical needs to help them maintain a level of independence at home. | In the previous five years of the current contract, there have been no upheld complaints, investigations, or reports in relation to this characteristic. No relevant alerts or trends have been identified through data gathered. |

| Socio-Economic Status                                                                                                             |                                                                                                                                                                                                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Provide detail for the impact listed in Q4.                                                                                       | Provide supporting data and evidence.                                                                                                                                                                                             |
| Households will not be discriminated against this characteristic. The service is not means-tested and is free of charge to users. | In the previous five years of the current contract, there have been no upheld complaints, investigations, or reports in relation to this characteristic. No relevant alerts or trends have been identified through data gathered. |

| Other Relevant Groups                       |                                       |
|---------------------------------------------|---------------------------------------|
| Provide detail for the impact listed in Q4. | Provide supporting data and evidence. |
| N/A                                         | N/A                                   |

- 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.

N/A

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

N/A

## 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.

Brent Council is committed to the principle of equal opportunities in the delivery of all its services and will seek to ensure that the Disabled Adaptations Service is delivered in a manner that is fair to all sections of the community regardless of their protected characteristic.

The tender process will also include method statements which allow the panel to assess how well the Provider is able to meet the needs of individual service users. The panel will also be assessing Providers to ensure their staff are DBS checked.

The specification also includes Brent's commitment to Equality and Diversity in Procurement and states clearly the commitment we expect from providers to promote equality and diversity, taking into account the needs of the people protected under the Equality Act 2010 in respect of the Protected Characteristics.

## SECTION D - RESULT

| Select one of the following options with an "X". |                                             |   |
|--------------------------------------------------|---------------------------------------------|---|
| A                                                | CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED | X |

|          |                                                 |  |
|----------|-------------------------------------------------|--|
| <b>B</b> | <b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b> |  |
| <b>C</b> | <b>CHANGE/ADJUST THE POLICY/PROPOSAL</b>        |  |
| <b>D</b> | <b>STOP OR ABANDON THE POLICY/PROPOSAL</b>      |  |

## 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.

| <b>Issue Identified</b> | <b>Action</b>                         | <b>Lead Officer</b> | <b>Completion Date</b> | <b>Status</b> |
|-------------------------|---------------------------------------|---------------------|------------------------|---------------|
| Review expected outcome | EIA to be reviewed by Head of Service | Neil Edwards        | 26/08/2026             | resolved      |
|                         |                                       |                     |                        |               |
|                         |                                       |                     |                        |               |
|                         |                                       |                     |                        |               |
|                         |                                       |                     |                        |               |
|                         |                                       |                     |                        |               |
|                         |                                       |                     |                        |               |

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

Through on-going performance monitoring via bi-annual performance meetings held with each contractor. Regular performance monitoring will ensure that the contract does not operate in a manner that disadvantages or discriminates against any particular group.

Each customer is assigned a grant officer as their direct contact with the council, and meetings are regularly held to include discussion of any issues our customers may have with the contractors, including once the adaptations have been completed.

Once each project has been completed, the relevant grant officer will score the contractor in relation to quality, time-management, safe storage of tools, waste and materials, and how well they considered and respected the customer's needs during the work. A second, more detailed customer survey is also carried out by telephone in relation to the service the customer received from the council.

If it is found that anybody may have been treated unfairly or experienced discrimination based on any of the protected characteristics, this would be investigated through the council's formal complaint process and/or disciplinary process as is relevant to the circumstances.

## SECTION F – SIGN OFF

|                                      | Signature                                                                          | Date           |
|--------------------------------------|------------------------------------------------------------------------------------|----------------|
| Officer:                             |   | 25 August 2026 |
| Reviewing Officer or Head of Service |  | 25 August 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.

|                                                                                                |  |
|------------------------------------------------------------------------------------------------|--|
| <b><u>Date of 1<sup>st</sup></u></b><br><b><u>Review:</u></b>                                  |  |
| <b>Officer:</b>                                                                                |  |
| <b>Comment on progress toward specific actions, and provide any data and evidence updates:</b> |  |
| <b>Reviewing Officer or Head of Service:</b>                                                   |  |
| <b><u>Date of 2<sup>nd</sup></u></b><br><b><u>Review:</u></b>                                  |  |
| <b>Officer:</b>                                                                                |  |
| <b>Comment on progress toward specific actions, and provide any data and evidence updates:</b> |  |
| <b>Reviewing Officer or Head of Service:</b>                                                   |  |
| <b><u>Date of 3<sup>rd</sup></u></b><br><b><u>Review:</u></b>                                  |  |
| <b>Officer:</b>                                                                                |  |
| <b>Comment on progress toward specific actions, and provide any data and evidence updates:</b> |  |
| <b>Reviewing Officer or Head of Service:</b>                                                   |  |

