

## EQUALITY IMPACT ASSESSMENT (EIA)

|                         |                                     |
|-------------------------|-------------------------------------|
| <b>POLICY/PROPOSAL:</b> | Anti-Social Behaviour Policy        |
| <b>DEPARTMENT:</b>      | Housing Services                    |
| <b>TEAM:</b>            | Quality, Assurance & Standards Team |
| <b>LEAD OFFICER:</b>    | Iptisam Gedi                        |
| <b>DATE:</b>            | 17 August 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 Anti-Social Behaviour (ASB) Policy sets out how Brent Council Housing Management Service will prevent, investigate, and respond to reports of anti-social behaviour. Its aim is to create safer communities by adopting a victim-centred, risk-based approach, promoting early intervention and prevention, supporting vulnerable residents, and taking appropriate enforcement action where necessary

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. The policy may impact all residents who access the Housing Management Service; however, particular consideration has been given to groups who may be disproportionately affected by anti-social behaviour or who may face barriers to reporting incidents or accessing support. These include:

- Older and younger people (Age)
- Care experienced individuals
- Disabled people, including those with physical, sensory, learning, mental health, and non-visible disabilities
- Transgender and non-binary people (Gender Reassignment)
- Pregnant women and new parents (Pregnancy and Maternity)
- People from different racial, ethnic, and national backgrounds (Race and Ethnicity)
- People of different religions and beliefs, including those with no faith (Religion or Belief)
- Women and men, including consideration of Violence Against Women and Girls (VAWG) (Sex)
- LGBTQ+ residents (Sexual Orientation)
- Residents experiencing poverty or socio-economic disadvantage (Socio-Economic Status)
- Residents experiencing domestic abuse, harassment, hate crime, safeguarding concerns, social isolation, or other vulnerabilities.

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 |
| <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                                                                                                          | X        |              |          |

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

\* 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? | <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</b> |          |
| <b>If you have answered YES to ANY of the above, proceed to section B.</b><br><b>If you have answered NO to ALL the above, proceed straight to section C.</b>        |          |          |

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 development process, the service has undertaken consultation with staff, tenants and leaseholders to gather feedback on the proposed Anti-Social Behaviour (ASB) Policy and to identify any areas that may require further clarification, improvement, or enhanced accessibility. The policy has also been informed by resident feedback, case management experience, and learning from ASB cases managed across the Housing Management Service.

Evidence used to inform the policy includes:

- Existing ASB case data, including the nature of reports received, case outcomes, vulnerability assessments and the support needs of residents affected by anti-social behaviour.
- Tenant Satisfaction Measures (TSM) and other resident engagement activities, which provide insight into residents' experiences of housing services, community safety, communication, and service accessibility.
- Legislative and regulatory requirements, including the Anti-Social Behaviour, Crime and Policing Act 2014, Equality Act 2010, Domestic Abuse Act 2021, and the Regulator of Social Housing's Neighbourhood and Community Standard.
- National guidance and best practice published by the Housing Ombudsman, Chartered Institute of Housing (CIH), National Housing Federation, and relevant government departments.

The policy recognises that certain groups, including disabled residents, older people, young people, victims of domestic abuse, women and girls, residents experiencing hate incidents, and other vulnerable individuals, may be disproportionately affected by ASB. Particular consideration has therefore been given to resident safety, safeguarding, accessibility, equality, and support needs throughout the policy.

The Council will continue to monitor ASB reports, case outcomes, resident satisfaction data, complaints, and feedback received through engagement activities to identify any emerging trends or unequal impacts and to inform future policy reviews and service improvements.

7. For each characteristic:

a. Provide detail for the impact listed in the response to Q4 in the left-hand box.

b. 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. |

|                                                                                                                                                                                                                                                                                                                                                                                                               |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <p>The policy is expected to have a positive impact on residents of all ages by promoting safer neighbourhoods and ensuring that reports of ASB are managed using a risk-based approach. Particular consideration is given to vulnerable residents, including older people, children, and young people who may be disproportionately affected by ASB, harassment, intimidation, or safeguarding concerns.</p> |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|

| Care Experience                                                                                                                                                                                                                                                                                                                   |                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Provide detail for the impact listed in Q4.                                                                                                                                                                                                                                                                                       | Provide supporting data and evidence. |
| <p>The policy is expected to have a positive impact on care experienced residents by ensuring reports are assessed based on individual vulnerability and support needs. Residents who may be vulnerable due to previous trauma, social isolation, or safeguarding concerns will be offered appropriate support and referrals.</p> |                                       |

| Disability                                                                                                                                                                                                                                |                                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Provide detail for the impact listed in Q4.                                                                                                                                                                                               | Provide supporting data and evidence. |
| <p>The policy is expected to have a positive impact on disabled residents by recognising that they may be disproportionately affected by ASB and may require additional support, reasonable adjustments, or accessible communication.</p> |                                       |

| Gender Reassignment                                                                                                                                                                                                     |                                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Provide detail for the impact listed in Q4.                                                                                                                                                                             | Provide supporting data and evidence. |
| <p>The policy is expected to have a positive impact by ensuring reports of harassment, intimidation, hate incidents, and discrimination are taken seriously and responded to fairly, regardless of gender identity.</p> |                                       |

| Marriage and Civil Partnership                                                                                                                                           |                                       |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
|                                                                                                                                                                          | Provide supporting data and evidence. |
| The policy is not expected to have any specific impact on individuals because of their marital or civil partnership status. The policy applies equally to all residents. |                                       |

| Pregnancy and Maternity                                                                                                                                                                                                |                                       |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Provide detail for the impact listed in Q4.                                                                                                                                                                            | Provide supporting data and evidence. |
| The policy is expected to have a positive impact by supporting the safety and wellbeing of pregnant women and new parents who may be more vulnerable to the effects of ASB, harassment, and community safety concerns. |                                       |

| Race and Ethnicity                                                                                                                                                                            |                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Provide detail for the impact listed in Q4.                                                                                                                                                   | Provide supporting data and evidence. |
| The policy is expected to have a positive impact on residents from all racial and ethnic backgrounds by addressing hate-related incidents and ensuring services are accessible and inclusive. |                                       |

| Religion or Belief                                                                                                                                              |                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Provide detail for the impact listed in Q4.                                                                                                                     | Provide supporting data and evidence. |
| The policy is expected to have a positive impact by ensuring that incidents motivated by religion or belief are taken seriously and investigated appropriately. |                                       |

| Sex |
|-----|
|-----|

|                                                                                                                                                                                                                                                               |                                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Provide detail for the impact listed in Q4.                                                                                                                                                                                                                   | Provide supporting data and evidence. |
| The policy is expected to have a positive impact on both men and women. It places particular emphasis on resident safety and recognises the disproportionate impact that harassment, intimidation, and community safety concerns can have on women and girls. |                                       |

| Sexual Orientation                                                                                                                                                                      |                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Provide detail for the impact listed in Q4.                                                                                                                                             | Provide supporting data and evidence. |
| The policy is expected to have a positive impact by ensuring that residents are protected from harassment, discrimination, and hate-related incidents regardless of sexual orientation. |                                       |

| Socio-Economic Status                                                                                                                                                                                                                               |                                       |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Provide detail for the impact listed in Q4.                                                                                                                                                                                                         | Provide supporting data and evidence. |
| The policy is expected to have a positive impact on residents experiencing socio-economic disadvantage by helping to create safer communities and ensuring that vulnerable residents have access to advice, support, and appropriate interventions. |                                       |

| Other Relevant Groups                                                                                                                                                                                                                                                                                                               |                                       |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------|
| Provide detail for the impact listed in Q4.                                                                                                                                                                                                                                                                                         | Provide supporting data and evidence. |
| The policy is expected to have a positive impact on vulnerable groups, including victims of domestic abuse, carers, residents experiencing social isolation, refugees, asylum seekers, and those with safeguarding needs. It ensures that risks are identified early and that residents receive appropriate support and protection. |                                       |

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.

As part of the development of the Anti-Social Behaviour (ASB) Policy, our service undertook a range of engagement activities to understand the experiences of residents affected by ASB and hate crime and to ensure that the policy reflects resident needs and expectations.

In **December 2024**, the Council conducted **15 one-to-one interviews** with tenants who had reported ASB or hate crime during the previous year. Engagement focused on obtaining feedback from residents with direct experience of the service and included vulnerable residents, some of whom were supported by carers during the interview process. Efforts were made to capture a diverse range of perspectives across different age groups, genders, ethnic backgrounds, and residents living in ASB hotspot areas, including Kilburn and Queensbury.

In addition, a six-week public consultation was undertaken through the Council's Have Your Say portal between **4 June 2026 and 19 July 2026**. Residents were invited to comment on the proposed Anti-Social Behaviour Policy and provide feedback on the Council's approach to preventing, managing, and responding to ASB. Feedback was received from **28 residents**, and this informed a number of amendments to the final policy.

To supplement this consultation, the draft policy was presented at a workshop with **Brent Youth Parliament**. This engagement provided valuable feedback from **eight young residents** with experience of ASB in Brent, ensuring that the views and experiences of younger people were considered during policy development.

Key themes emerging from the engagement included the need for:

- Improved communication and regular case updates.
- Greater accountability and consistency in case management.
- Enhanced support for vulnerable residents and victims.
- Improved confidentiality and anonymity for residents reporting incidents.
- Clearer information on reporting routes, available support, and the Council's powers.
- A stronger focus on hate crime, community safety, and resident wellbeing.
- 

The feedback received directly informed several enhancements to the policy, including strengthened communication standards, the introduction of named case officers, improved information on reporting routes and support services, enhanced victim-centred and safeguarding approaches, and a greater emphasis on prevention, partnership working, and resident safety.

The engagement activities involved a broad range of residents who are representative of many of the groups affected by the policy. Ongoing engagement will continue through resident forums, surveys, complaints feedback, and future policy reviews to ensure that the experiences of all residents, particularly vulnerable and underrepresented groups, continue to inform service improvements

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

## 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.

The Assessment concludes that the Anti-Social Behaviour (ASB) Policy is expected to have an overall positive impact on Brent Council tenants, leaseholders and residents. The policy promotes community safety, supports victims of ASB and hate-related incidents, strengthens safeguarding arrangements, and ensures a fair, consistent and victim-centred approach to case management.

The assessment found that the policy is likely to have particular benefits for vulnerable residents, including older people, disabled residents, women and girls, victims of domestic abuse, residents experiencing hate incidents, and those who may be disproportionately affected by anti-social behaviour. The policy includes measures to improve accessibility, communication, support, partnership working, and early intervention, helping to ensure that residents receive appropriate assistance and protection.

No significant adverse impacts have been identified. While some residents may require additional support to access services or engage with the ASB process, these risks are mitigated through vulnerability assessments, safeguarding procedures, accessible reporting methods, interpreting services, reasonable adjustments, tailored support, and referrals to specialist agencies where appropriate.

Resident engagement and consultation have informed the development of the policy and resulted in a number of improvements, including stronger communication standards, clearer reporting routes, enhanced victim support, greater accountability, and an increased focus on resident safety and prevention. These changes are expected to strengthen the positive impact of the policy across all resident groups.

Overall, the policy supports Brent Council's obligations under the Equality Act 2010 and contributes to eliminating discrimination, advancing equality of opportunity, and fostering good relations within communities. The policy should therefore proceed as proposed, with ongoing monitoring and resident engagement used to identify opportunities for further improvement.

## SECTION D - RESULT

Select one of the following options with an "X".

|   |                                             |  |
|---|---------------------------------------------|--|
| A | CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED |  |
|---|---------------------------------------------|--|

|          |                                                 |          |
|----------|-------------------------------------------------|----------|
| <b>B</b> | <b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b> | <b>X</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> |
|---------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------|---------------------|------------------------|---------------|
| Lack of training and awareness from staff on ASB Policy | Commit to sharing and training staff on the new ASB procedures & Policy, including awareness of equality implications | Iptisam Gedi        | 08.04.27               |               |
|                                                         |                                                                                                                       |                     |                        |               |
|                                                         |                                                                                                                       |                     |                        |               |
|                                                         |                                                                                                                       |                     |                        |               |
|                                                         |                                                                                                                       |                     |                        |               |
|                                                         |                                                                                                                       |                     |                        |               |
|                                                         |                                                                                                                       |                     |                        |               |

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

The impact of the Anti-Social Behaviour Policy will be monitored through regular review of ASB performance data, case outcomes, resident satisfaction measures, complaints, compliments, and feedback received through engagement activities. The Council will analyse trends relating to vulnerability, safeguarding, hate incidents, domestic abuse, and protected characteristics where data is available to identify any disproportionate impacts on particular groups.

Monitoring will also include:

- Performance against ASB service standards and key performance indicators (KPIs).
- Review of response times, case resolutions, enforcement activity, and resident satisfaction levels.
- Analysis of complaints and ASB Case Reviews (Community Triggers).
- Feedback from residents, tenant forums, consultations, and engagement activities.
- Review of outcomes from partnership working arrangements, including multi-agency forums such as BJAG and MARAC.
- Ongoing review of equality, accessibility, safeguarding, and vulnerability considerations within case management.

The policy will be formally reviewed on a regular basis, or sooner where legislative, regulatory, operational, or equality considerations indicate that changes are required. Findings from monitoring activities will be used to identify service improvements, inform future policy reviews, and ensure the policy continues to deliver fair, accessible, and effective outcomes for all residents.

## SECTION F – SIGN OFF

|                                             | Signature        | Date           |
|---------------------------------------------|------------------|----------------|
| <b>Officer:</b>                             | Iptisam Gedi     | 17 August 2026 |
| <b>Reviewing Officer or Head of Service</b> | Spencer Randolph |                |

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