EQUALITY IMPACT ASSESSMENT (EIA)

POLICY/PROPOSAL:	Housing Vulnerable Residents and Reasonable Adjustments Policy
DEPARTMENT:	Residents and Housing Services
TEAM:	Housing Services
LEAD OFFICER:	Andrew Phillips
DATE:	01/09/2026

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 Council's approach to ensuring that residents with vulnerabilities receive fair, equitable, and accessible housing services. The policy recognises that vulnerability can affect how individuals engage with housing processes, understand information, report repairs, and sustain their accommodation. Therefore, the policy aims to ensure that service design, policy development and day to day interactions are not more difficult for residents with challenging personal circumstances. A central aim of this policy is to ensure that residents who require additional support receive timely and appropriate reasonable adjustments. By doing so, the Council will not only comply with statutory duties, but actively promote an environment where residents feel understood and supported.

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

This policy will impact all Council tenants, or adults seeking Council housing services, with vulnerabilities, the level of which is assessed when they apply for assistance. Vulnerabilities are identified through resident disclosure, staff observations including home visits, information shared by partner agencies (with consent) and issues that arise in temporary accommodation. As well as vulnerabilities, the policy covers reasonable adjustments which is how we will adapt our approach so residents with barriers to communication, understanding information, attending appointments or following standard processes.

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		**X**	

progression, and health outcomes.			
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* *[replace this text and specify where appropriate]*	**X Carers. Refugees/Asylum Seekers**		

* 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.

A range of data sources have been used to benchmark against the policy, outlined in section 7. Additionally, quantitative data from the Have Your Say consultation, which ran for six weeks, has also used to inform the content in this document.

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.
This policy will specifically impact adults, because it is for individuals with vulnerabilities who interact with housing services. Although children may be affected by the vulnerabilities of their parents, they will not be identified as having them under this policy due to the methods of identifying vulnerabilities.	Only adult residents engage with housing services in Brent.

Care Experience	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
This policy will support people with care experience who may have vulnerabilities, such as instability, mental health conditions or trauma associated with their experiences in care. The policy aims to ensure that residents who engage with housing services are treated equitably, regardless of personal circumstances tat may make accessing services more difficult.	Children in care and care leavers - Preventing Exploitation Toolkit Care experienced people are a particularly vulnerable group – they may have experienced abuse, neglect or trauma. This can lead to significant emotional, behavioral and mental health needs. The experiences of being in care can continue to impact on children and young people after they have left the care system, especially if the transition into family or adult life is challenging and if the support they receive is unable to meet their needs.

	Care leavers are often required to become independent at a younger age than their peers. They may be expected to become responsible for finding housing without the support networks available to many other young adults. This transition can be challenging and stressful, and exacerbated by previous traumas from care.

Disability	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
This policy will support residents with disabilities to be treated fairly and experience equitable outcomes, regardless of personal circumstances that may make accessing housing services more difficult. The policy aims to make sure processes are flexible to accommodate individual needs, and residents with disabilities will receive timely, and appropriate reasonable adjustments.	Trust for London - Barriers to housing and services across London neighbourhoods Whilst not directly referencing disabilities, research from Trust for London shows that Brent has severe barriers to housing and services, which includes both affordability, as well as the proximity of local services. Where this is accompanied by disability, it could make services more difficult to access for residents.

Gender Reassignment	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
This policy will support transgender residents, or residents who have experienced gender reassignment, to be treated fairly and experience equitable outcomes, regardless of personal circumstances or stigma that may make accessing housing services more difficult. The policy aims to make sure processes are inclusive of residents' identity and experiences.	There was no robust data measuring the number of people who have experienced gender reassignment who are currently homeless in the UK. However transgender individuals face disproportionately high rates of housing instability and homelessness which can stem from familial rejection, workplace and rental discrimination, or the lack of trans-inclusive, gender affirming temporary accommodation. Published evidence and findings suggest some of the homelessness experiences of transgender people are distinct and closely related to their gender identity.

Marriage and Civil Partnership	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.

We do not have data to show married people or those in a civil partnership have more vulnerabilities, but all residents living in Brent Housing will be positively impacted by the Council's redesign of housing services to be more inclusive and accessible to people with vulnerabilities and other challenges.	

Pregnancy and Maternity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
This policy will positively support residents during and immediately after pregnancy who engage with housing services. The policy aims to ensure that residents who engage with housing services are treated equitably, regardless of personal circumstances tat may make accessing services more difficult.	Infant Journal Pregnancy is a vulnerable time of life. Housing insecurity during pregnancy can significantly elevate the risk of severe maternal morbidity, preterm delivery, and low infant birth weight, therefore it is important that pregnant residents who seek housing support receive timely and appropriate reasonable adjustments. Frequent moves and moves out of area can affect the degree to which families engage with maternity and health services. Relationships with professionals can break down and families may not know how or where to access services in a new area. It can also be harder for home visits to take place in temporary accommodation, and because both parents and professionals can become overwhelmed and preoccupied with the housing problems, these issues can overshadow health and well-being. Therefore, when residents seek housing services their pregnancy or maternity should be taken into account under the vulnerabilities policy.

Race and Ethnicity	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
National evidence shows that some ethnic minority groups are disproportionately represented amongst households experiencing homelessness and housing need. The policy will help ensure vulnerabilities are identified consistently and that residents receive equitable support regardless of race or ethnicity.	Gov.uk ethnicity facts and figures - homelessness

Religion or Belief

Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
We do not have data to show people with different religions or beliefs have more vulnerabilities, but all residents living in Brent Housing will be positively impacted by the Council's redesign of housing services to be more inclusive and accessible to people with vulnerabilities and other challenges. National data shows that religion or belief may influence their housing needs, availability to engage with services, or accommodation requirements. The policy encourages a flexible and inclusive approach that recognises these needs and promotes equitable service access.	People experiencing homelessness, England and Wales: Census 2021 – Ethnic group, national identity, language and religion tables

Sex	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
We do not have data to display that sex impacts directly on vulnerabilities, however the policy has provision in place to ensure that where sex is likely to impact on a situation (e.g. women are more likely to be impacted by domestic abuse/coercive control), that this is taken into account.	

Sexual Orientation	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
We do not have data to show people of different sexual orientations have more vulnerabilities, but all residents living in Brent Housing will be positively impacted by the Council's redesign of housing services to be more inclusive and accessible to people with vulnerabilities and other challenges.	Lesbian, gay, bisexual and transgender people's experiences of homelessness - GOV.UK There was no robust data measuring the number of LGBT people currently homeless in the UK. However, existing evidence indicated that LGBT people may be at a greater risk of experiencing homelessness than people not identifying as LGBT. Published evidence and the findings from this study suggest that some of the homelessness experiences of LGBT people are distinct, and closely related to their sexual orientation or gender identity. Issues related to sexual and gender identity often underpin their triggers of homelessness, for example familial abuse that is homophobic, biphobic or transphobic. They face discrimination by landlords and employers,

	familial and social networks can dissipate when they come out, and concerns for safety restrict their housing options. Mainstream temporary accommodation can be a hostile space for LGBT homeless people. So they sometimes rely on informal, hidden and sometimes unsafe temporary accommodation.

Socio-Economic Status	
Provide detail for the impact listed in Q4.	Provide supporting data and evidence.
Financial hardship, debt, unemployment and housing affordability pressures can increase the likelihood of housing vulnerability. The policy supports early identification of these factors and seeks to ensure residents facing socio-economic disadvantage can access support proportionate to their needs.	Trust for London - Brent poverty and inequality data Trust for London displays Brent as having an average poverty rate compared to other London boroughs; this is also reflected in housing statistics including affordability, homelessness and temporary accommodation.

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

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.

Engagement was conducted via consultation with Brent tenants and leaseholders who would be affected by the policy.

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

There are gaps in Brent specific data on housing vulnerabilities, as set out in section 7.

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.

There are positive impacts, which could be strengthened with high awareness of this policy amongst staff so they can signpost tenants to the support services, make reasonable adjustments and so forth. For other protected characteristics, the policy is considered to have a neutral impact as it applies consistently to all tenants.

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
Need for housing staff to be aware of the content of the policy	Training and awareness for staff to understand the impact of vulnerabilities on housing	Jodi Cooper	12.04.27	Ongoing

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

The ongoing impact of the policy will be monitored through its implementation; officers should feel confident to spot residents who are vulnerable and to then signpost to other services to help support them further.

SECTION F – SIGN OFF

	Signature	Date
Officer:	Andrew Phillips	01.09.26
Reviewing Officer or Head of Service	Jodi Cooper	01.09.26

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.

Date of 1st Review:	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	
Date of 2nd Review:	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	
Date of 3rd Review:	
Officer:	
Comment on progress toward specific actions, and provide any data and evidence updates:	
Reviewing Officer or Head of Service:	