

Appendix 3 – Equality Impact Assessment

1. Roles and Responsibilities	
<p>Directorate: Regeneration and Growth</p> <p>Service Area: Housing and Employment</p>	<p>Person Responsible: Name: Jon Lloyd-Owen Title: Operational Director Contact No: 020 8937 5199</p> <p>Signed: </p>
<p>Name of policy: HRA Asset Management Strategy</p>	<p>Date analysis started: 4 October 2013</p> <p>Completion date: 23 October 2013</p> <p>Review date: 31 March 2014</p>
<p>Is the policy:</p> <p>New <input checked="" type="checkbox"/> Old <input type="checkbox"/></p>	<p>Auditing Details: Name: Michael Keating Title: Interim Lead for Equality Date 31/10/2013 Contact No: 07551143473 Signed: MK</p>
<p>Signing Off Manager: responsible for review and monitoring</p> <p>Name: Jon Lloyd-Owen Title: Operational Director Date: 31 October 2013 Contact No: 020 8937 5199</p> <p>Signed: </p>	<p>Decision Maker: Executive</p> <p>Date: 11 November 2013</p>

2. Brief description of the policy. Describe the aim and purpose of the policy, what needs or duties is it designed to meet? How does it differ from any existing policy or practice in this area?

Please refer to stage 2 of the guidance.

The HRA Asset Management Strategy sets priorities for the maintenance, improvement and development of the Council's housing stock. The purpose of the strategy is to improve the condition, quality and performance of the Council's housing stock and expand the stock in order to increase the capacity of the Council to meet housing needs within the borough.

The Asset Management Strategy is not a statutory document. It supports the Council's Corporate Strategy and Regeneration Strategy and is consistent with the emerging priorities in the Council's draft Housing Strategy.

The Council does not currently have an approved Asset Management Strategy for its housing stock. The strategy amends the existing policy to invest Right-to-Buy receipts for new provision through Registered Provider partners with these receipts to be invested instead through the HRA. Capital receipts are currently pooled corporately and the Asset Management Strategy requires that receipts arising from HRA stock disposals are ring-fenced for investment in affordable housing.

3. Describe how the policy will impact on all of the protected groups:

The Asset Management Strategy will provide for an increased level of investment in the Council's Housing Stock. This will improve the housing conditions of protected groups who are currently or in the future become tenants of the Council. Households with a person with a disability are over-represented within the Council's social housing stock compared with the borough's housing stock generally. Priority investment in energy efficiency measures will assist in reducing fuel poverty which impacts particularly on vulnerable households.

The Strategy will provide for the development of additional affordable housing which will be allocated to priority groups including vulnerable persons under the Council's Allocations Scheme and will directly benefit these groups.

The Strategy will improve, through a programme of stock rebalancing and new development, the alignment between available lettings of social housing and the profile of demand and increase the Council's capacity to meet the housing needs of vulnerable households. The increase in provision of larger family homes will be beneficial to larger households in housing need, and such households are more heavily represented in some BAME communities than in the population as a whole. A priority for new development will be the provision of new housing for people with disabilities to provide greater access to affordable housing and increase the housing options and alternatives to residential care for such households.

Please give details of the evidence you have used:

Evidence to establish the impact of the policy has been drawn from the Council's Housing Register and from the Northgate system and from the Evidence base assembled to support the Councils' draft Housing Strategy 2014-19. Appendix 1 provides an excerpt of relevant evidence.

4. Describe how the policy will impact on the Council's duty to have due regard to the need to:

(a) Eliminate discrimination (including indirect discrimination), harassment and victimisation;

The Asset Management Strategy will be supportive of the Council's efforts in these regards through increasing the availability of secure, affordable accommodation for vulnerable individuals and households who are subject to discrimination, harassment and victimisation.

(b) Advance equality of opportunity;

Improving the condition, quality and performance of the housing stock will help provide greater security for local residents. It will play a crucial part in tackling poverty and addressing health inequalities, supporting educational attainment, meeting the needs of older people, etc.

The rebalancing of the Council's stock will redress the relative under-provision of larger family homes, which are required to meet the needs of some BAME communities to a greater extent than for the population as a whole.

The provision of additional affordable housing for people with a disability will increase housing options and access to a secure affordable home for such residents.

(c) Foster good relations

Decent housing is an important contribution to improving community cohesion. However its allocation can also undermine this especially when resources are limited. Investment in the Council's existing stock will therefore be undertaken on a transparent basis and in accordance with explicit priorities that have been endorsed through consultation with Council's tenants and leaseholders.

5. What engagement activity did you carry out as part of your assessment?

Please refer to stage 3 of the guidance.

i. Who did you engage with?

Consultation was undertaken with Council tenants and leaseholders, with voluntary and community groups and with borough residents generally.

ii. What methods did you use?

The draft strategy and consultation questions were publicised through Brent Connects on the Council's website.

A postal survey was sent to all Council tenants and leaseholders

A survey link was sent to borough residents on the Council's Citizens Forum email list

An open meeting was held for Council tenants and leaseholders to consider the proposals

A consultation event open to all borough residents was held at the Civic Centre providing the opportunity for 1-1 discussion and group presentations and comment.

iii. What did you find out?

The development of additional affordable homes to increase the Council's capacity to meet housing needs was strongly supported.

The provision of larger family homes to increase the capacity to meet the needs of larger households was endorsed.

That additional housing provision for households with an individual with a disability should be a key priority

That energy efficiency measures to reduce fuel poverty should be a key priority

iv. How have you used the information gathered?

The responses to the consultation have been taken into account in the finalising the strategy. Overall, the draft proposals were strongly endorsed and the final strategy has been revised to reflect additional priorities and degrees of priority identified through the consultation.

v. How has it affected your policy?

The commitment to maximise affordable housing development, including through the use of a range of resources and approaches, has been strengthened within the final strategy. A target to develop 1,000 affordable homes over the first seven-years of the strategy has been set.

The provision of additional housing for people with a disability has been incorporated as a key priority in the final strategy.

Greater priority is given to energy efficiency works to reduce fuel poverty

6. Have you identified a negative impact on any protected group, or identified any unmet needs/requirements that affect specific protected groups? If so, explain what actions you have undertaken, including consideration of any alternative proposals, to lessen or mitigate against this impact.

Please refer to stage 2, 3 & 4 of the guidance.

No negative impact has been identified. While the strategy will increase the Council's capacity to meet housing needs including the need for decent, affordable housing for protected groups it is recognised that the scale of development that can realistically be achieved within available resources will fall far short of the scale of provision required to address unmet housing needs.

Please give details of the evidence you have used:

See Appendix 1

7. Analysis summary

Please tick boxes to summarise the findings of your analysis.

Protected Group	Positive impact	Adverse impact	Neutral
Age	X		
Disability	X		
Gender re-assignment	X		
Marriage and civil partnership	X		
Pregnancy and maternity	X		
Race	X		
Religion or belief	X		
Sex	X		

Sexual orientation	X		X
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8. The Findings of your Analysis

Please complete whichever of the following sections is appropriate (one only). Please refer to stage 4 of the guidance.

No major change

Your analysis demonstrates that:

- *The policy is lawful*
- *The evidence shows no potential for direct or indirect discrimination*
- *You have taken all appropriate opportunities to advance equality and foster good relations between groups.*

Please document below the reasons for your conclusion and the information that you used to make this decision.

The Asset Management Strategy is consistent with the Council's legal obligations. The assessment has not identified any adverse or discriminatory impacts. The Asset Management Strategy prioritises the development and reform of the Council's stock, within the constraint of available resources and statutory and contractual responsibilities for maintenance and repair of its housing stock.

Adjust the policy

This may involve making changes to the policy to remove barriers or to better advance equality. It can mean introducing measures to mitigate the potential adverse effect on a particular protected group(s).

Remember that it is lawful under the Equality Act to treat people differently in some circumstances, where there is a need for it. It is both lawful and a requirement of the public sector equality duty to consider if there is a need to treat disabled people differently, including more favourable treatment where necessary.

If you have identified mitigating measures that would remove a negative impact, please detail those measures below.

Please document below the reasons for your conclusion, the information that you used to make this decision and how you plan to adjust the policy.

Continue the policy

This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not amount to unlawfully discrimination, either direct or indirect discrimination.

In cases where you believe discrimination is not unlawful because it is objectively justified, it is particularly important that you record what the objective justification is for continuing the policy, and how you reached this decision.

Explain the countervailing factors that outweigh any adverse effects on equality as set out above:

Please document below the reasons for your conclusion and the information that you used to make this decision:

Stop and remove the policy

If there are adverse effects that are not justified and cannot be mitigated, and if the policy is not justified by countervailing factors, you should consider stopping the policy altogether. If a policy shows unlawful discrimination it must be removed or changed.

Please document below the reasons for your conclusion and the information that you used to make this decision.

9. Monitoring and review

Please provide details of how you intend to monitor the policy in the future. Please refer to stage 7 of the guidance.

The effects of the implementation of the Asset Management Strategy will be monitored by the Council and by BHP. This will include the achievement of target expenditure and required outcomes in relation to the stock investment programme, and the implementation of the first phase of new development and progress over time towards the target to develop 1,000 affordable homes. Resident satisfaction will be systematically measured. Progress and performance will be reported to the Council's Executive at least annually – and include information about how sections of the community have been advantaged or disadvantaged by the Strategy.

The Asset Management Strategy will be reviewed in response to changes in the external environment to ensure that it remains relevant and to identify and secure any additional opportunities that arise to further advance the Council's objectives.

10. Action plan and outcomes

At Brent, we want to make sure that our equality monitoring and analysis results in positive outcomes for our colleagues and customers.

Use the table below to record any actions we plan to take to address inequality, barriers or opportunities identified in this analysis.

Action	By when	Lead officer	Desired outcome	Date completed	Actual outcome
Increase affordable housing	2014	BHP	Commence first phase of development	In 2014	
Achieve target stock investment	2014/15		Annual target spend, proven value-for-money and high resident satisfaction	2014/15 and annually thereafter	
Provide additional housing for larger households and for people with disabilities	2014/15		Increased provision for these groups, arising from 2014/15	2014/15	

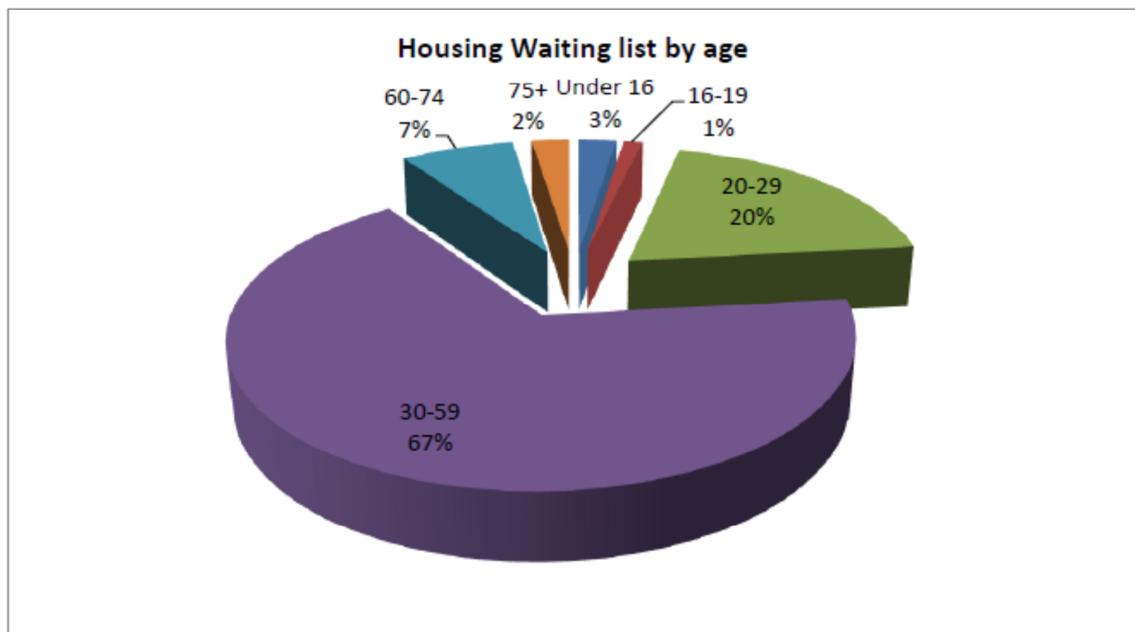
Please forward to the Corporate Diversity Team for auditing.

Appendix 1 – Evidence Base

The Housing Register and Brent Tenants

Analysis by age shows that applications for housing, including those arising from homelessness, are dominated by households in the 20-59 age group, who are more likely to have children and need larger homes. Households aged 16-19 (1% of the waiting list) and over 60 (7%) tend to be single or childless couples. A key aim of the policy is to increase the number of larger homes available to the dominant demand group.

Table 1: Housing waiting list by age



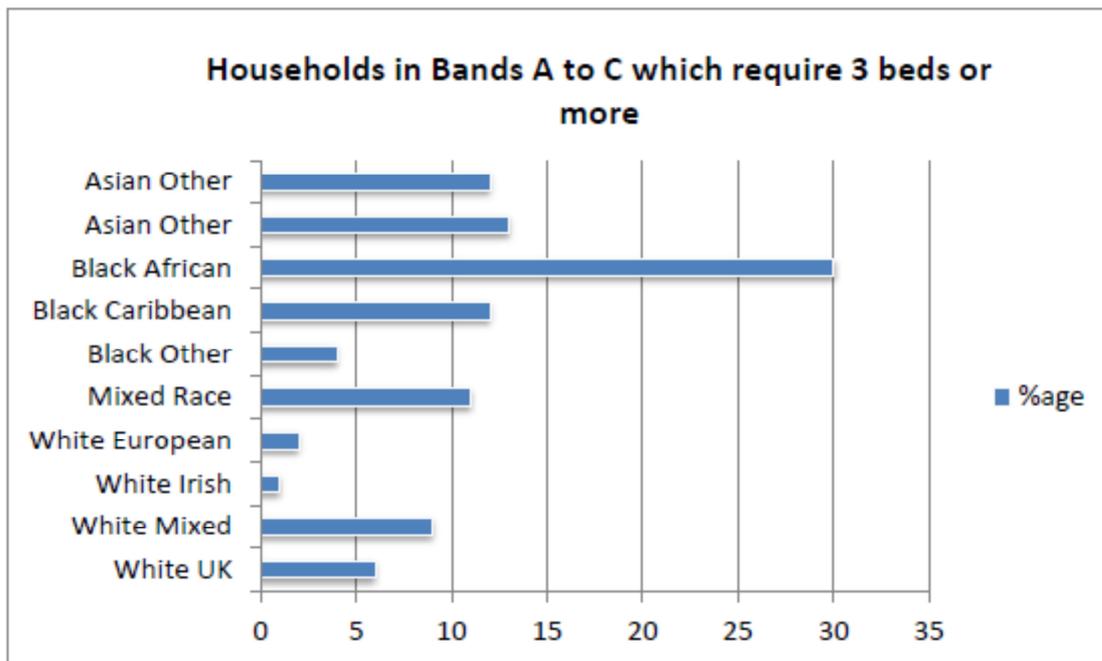
Source: Brent Council – Housing Options – Northgate April 2012

Brent Council Housing Tenants and Disability

The most recent data for Brent Housing Partnership gives the following breakdown of disability. Note that this data is for all occupants of BHP housing, not just tenants or joint tenants, since this gives a more accurate picture of the position within households.

Disability Type	Number of People
Arthritis	39
Asthmatic	55
Bad Back/Back Pains	8
Blind	19
Blood Pressure, Hypertension	20
Cancer	36
Chronic Heart Disease	56
Deaf	30
Details against Other Field	30
Diabetes	114
Epilepsy	15
Hearing impairment	60
HIV/AIDS	3
Learning difficulties	30
Long standing illness/health condition	93
Mental illness/condition	115
Mobility impaired	1031
No answer supplied	32
No disability	4040
Physical impairment	112
Progressive disability/chronic illness	75
Registered Disabled	1359
Speech impairment	22
Stroke	23
Visual impairment	65
	5862

Ethnicity



The profile of the households applying for housing reflects the overall position in the Brent population, where larger households are most prevalent among BAME Communities. In terms of meeting the most acute needs, the policy is therefore likely to provide significant benefits for this group, although projected new supply will not meet all identified need. Larger households are also most affected by welfare reform, in particular the overall benefit cap, and an increased supply of larger homes at rents below market and Affordable Rent levels will be important in mitigating the impact of benefit limitations.