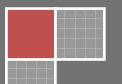


Equality Analysis



Brent Council Equality Analysis Form

Please contact the Corporate Diversity team before completing this form. The form is to be used for both predictive Equality Analysis and any reviews of existing policies and practices that may be carried out.

Once you have completed this form, please forward to the Corporate Diversity Team for auditing. Make sure you allow sufficient time for this.

1. Roles and Responsibilities: please refer to stage 1 of the guidance	
Directorate: Regeneration & Growth Service Area: Housing Needs Service	Person Responsible: Name: Saleema Nuraney Title: TA Strategy & Contracts Officer Contact No: 020 8937 2076 Signed: S.Nuraney
Name of policy: Dynamic Purchasing System (DPS) for the Procurement and Management of Temporary Accommodation (Within M25)	Date analysis started: October 2014 Completion date: December 2014 Review date: March 2015
Is the policy: New <input type="checkbox"/> Old <input type="checkbox"/>	Auditing Details: Name: Lade Ogunstein Title: Interim Head of Care and Support Date : 23.12.14 Contact No:0208 937 2977 Signed:
Signing Off Manager: Name: Zaheer Iqbal Title: Service Manager, Accommodation Date: 23.12.14 Contact No: 020 8937 2155 Signed: Z.Iqbal	Decision Maker: Name individual /group/meeting/ committee: Date:

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?

This Equalities Analysis (EA) is conducted on the retendering of the Private Managed Accommodation scheme (PMA) as the current contract is due to expire on 4 July 2015.

The existing contract was awarded to 17 Organisations after a competitive tender process in July 2011 for a period of two years, with an option to extend for up to a further two years.

The Council will be retendering this contract as a Dynamic Purchasing System (DPS) for the Procurement and Management of Temporary Accommodation (within the M25). All

properties procured under this scheme are within the M25.

The Council uses various temporary accommodation (TA) schemes to accommodate households who have been accepted under homelessness legislation until either social housing or private sector accommodation can be secured to discharge homelessness duties.

Private Sector Leasing (PSL) schemes involve the Council leasing properties from the private sector and letting them to homeless households as temporary accommodation. The Private Managed Accommodation (PMA) scheme is a type of Private Sector Leasing Scheme.

At the time of writing there are 3,400 homeless households in various TA schemes. Of these, 113 are in PMA accommodation within the M25.

As per section 208 of the Housing Act 1996, and paragraph 16.7 of the Homelessness Code of Guidance, so far as reasonably practicable, the Council seeks to accommodate homeless households in Brent and always considers the suitability of the accommodation, taking into account the circumstances of the individual household.

However, due to the Local Housing Allowance (LHA) Caps introduced in 2011 an increasing number of households are likely to be placed outside the borough, as it will not be reasonably practicable to provide accommodation within Brent. The provision of accommodation outside of London is provided through the PSA scheme, for which a separate EA has been conducted.

The LHA reforms have led to increasing difficulty in procuring family sized accommodation within the geographical boundaries of the borough under any of Brent's existing temporary accommodation leasing schemes for households who require 2 bedrooms or more. The LHA rates for TA in South Brent are capped as follows (Jan 2011 LHA @ 90%):

£234 pw for a 1-bedroom property
£306 pw for a 2-bedroom property
£405 pw for a 3-bedroom property
£500 pw for all other properties of 4 bedroom or more

In comparison, private sector rents have been increasing at a rate of 2.9% per year and Brent now has the 5th highest levels in London which has resulted in an increase in lease ends for clients who are currently accommodated in TA.

An additional pressure to sourcing in-borough accommodation is the end of the current Housing Association Leasing Scheme (HALS) contract, due to expire in February 2015. A separate report was presented to Cabinet on 21 July 2014 seeking approval to retender this scheme. HALS accommodation currently provides over 1,800 units of Temporary Accommodation that is predominantly located in Brent. However, due to the overheated market in London, this portfolio is diminishing due to owners of leased properties not renewing the leases and renting in the private housing market. It is intended that the PMA scheme will provide the council with an additional supply of units to house homeless

households that can no longer be provided for under the HALS scheme.

In seeking to accommodate homeless households in Brent and Greater London, Brent's TA Placement Policy (Appendix 1) details how applicants will be prioritised for housing within London, and outside of London.

Priority for in-borough placement is given to:

- Applicants with a severe and enduring health condition requiring intensive and specialist medical treatment that is only available in Brent.
- Applicants who are in receipt of a significant package and range of health care options that cannot be easily transferred.
- Applicants with a severe and enduring mental health problem who are receiving psychiatric treatment and aftercare provided by community mental health services and have an established support network where a transfer of care would severely impact on their well being.
- Households with children registered on the Child Protection register in Brent, or families who have high social needs who are linked into local health services and where it is confirmed that a transfer to another area would impact on their welfare.
- Households containing a child with special educational needs who is receiving education or educational support in Brent, where change would be detrimental to their well-being.
- Applicants who have a longstanding arrangement to provide care and support to another family member in Brent who is not part of the resident household and would be likely to require statutory health and social support if the care ceased.
- Any other special circumstance will also be taken into account

Priority for placements in Greater London is given to:

- Applicants who have been continuously employed in Greater London for a period of six months, and for 24 hours or more per week. Women who are on maternity leave from employment and meet the above criteria would also be prioritised for placements in Greater London.
- Applicants who have as part of their household, a child or children who are enrolled in public examination courses in Brent, with exams to be taken within the next six months. Wherever practicable we will seek to place such households within 60 minutes travelling distance of their school or college.
- Wherever practicable, any applicant who works for more than 24 hours per week and has been employed continuously for more than six months will not be placed more than 90 minutes travelling distance by public transport, from their place of employment.
- Applicants who meet none of the above criteria will be offered properties out of

London when no suitable property is available.

- Any other special circumstance will be taken into account.

When a household approaches the council in housing need, the Housing Options team will try to prevent homelessness wherever they can. If this is not possible the Housing Options team makes a formal assessment against a number of criteria as prescribed in homelessness legislation, before determining whether there is a statutory duty to rehouse a homeless household.

The Housing Act 1996 code of Guidance makes reference to criteria in the 'suitability of accommodation' order which takes into account educational, welfare and medical needs. These criteria will be used to make decisions about whether to place in or out of borough. The Council's TA Placement Policy (Appendix 1) uses these criteria to ensure that certain vulnerable groups remain in borough.

The scope of services will include a full property management service to include property acquisition, viewings and lettings processes, tenancy management, property inspections, administering decants, void periods and property handbacks and performance management.

The intention of the PMA scheme is to continue to meet the gap between the need for housing and the supply of affordable temporary accommodation for households who, in line with Brent's TA Placement Policy, cannot be relocated outside of London. The principal aims of the scheme are to:

- Continue to meet the housing need for eligible, homeless persons with a priority need for whom the Council has a statutory duty to provide suitable TA under part VII of the Housing Act 1996 (as amended by the Homelessness Act 2002).
- Meet housing need through provision of appropriate affordable housing
- Make best use of leased accommodation to meet housing need
- To specify the affordability thresholds to be complied with by Contractors when setting rents
- Encourage Housing providers to pay full regard to the affordability of TA
- Promote a consistent approach to the letting and management of TA in the borough

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

A key aim of this TA scheme is to ensure that services meet the housing needs of service users irrespective of their age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

The Council's TA Placement Policy details how applicants will be prioritized for housing in Brent. This includes temporary accommodation placements for households accepted as homeless under S193 of the Housing Act 1996 (these are households where we have accepted a duty to assist). The policy outlined here will aim to ensure that housing need is met in a fair, consistent and non discriminatory manner.

This equalities analysis concentrates on the 113 applicants who have been accommodated under the PMA scheme for whom the Council has accepted a duty under homelessness legislation as this gives us an indication of the households who are likely to access this scheme in the future.

Housing management systems currently do collect information on gender reassignment and Civil partnership in addition to the other protected characteristics, but due to the recent introduction of the data fields, these fields are not populated sufficiently for analysis to be conducted. In some of the analysis, the last two years of data has been used to provide an indication of the demand groups.

Age

In line with the TA Placement Policy, wherever practicable, working households will not be relocated more than 90 minute's travel from their home so this scheme is more likely to have a positive impact on working households. Analysis also indicates that there is a positive impact on households who are under 45. Households accommodated under the PMA scheme appear to be highest amongst the under 45 year olds hence indicating this cohort is likely to be positively impacted in this age group.

Homeless Households by Age	Count	
65 and over	2	1.77%
Between 45 and 49	11	9.73%
Between 50 and 54	8	7.08%
Between 55 and 59	4	3.54%
Between 60 and 64	2	1.77%
Under 45	86	76.11%
Grand Total	113	100.00%

Disability

The provision of accommodation is based on client need. Where adapted or single level accommodation is required for households with a disability, housing providers are informed to procure suitable accommodation. Households with a disability are likely to require property that is specifically suited to their situation, based on assessment of their

mobility needs. Before an offer of TA is made, each case would be assessed individually based on the District Medical Officer's (DMO) recommendations. This is often limited to a mobility category award:

- Mobility Group 1 - Suitable for wheelchair user indoors and outdoors
- Mobility Group 2 - Suitable for people who cannot manage steps or stairs and may use a wheelchair some of the day
- Mobility Group 3 - Suitable for people only able to manage 1 or 2 steps or stairs

M1 – suitable for a wheelchair user, indoors and outdoors (it will have a wet room, ramps etc)

M2 – Suitable for people who cannot manage steps or stairs, and may use a wheelchair some of the day

M3 – Suitable for people only able to manage 1 or 2 steps or stairs.

Furthermore, where a medical condition can affect a person's ability of handling numerous stairs, the DMO will make a recommendation about the number or flights of stairs the applicant can handle in a building without a lift.

The relevant households currently accommodated under the PMA scheme are as follows:

Is the PMA household in receipt of Disability Allowance?	
Row Labels	Count
No	113
Grand Total	113

Homeless households in PMA by mobility category		
Row Labels	Count	
3	4	3.54%
(blank)	109	96.46%
Grand Total	113	100.00%

Currently, there are no households accommodated under the PMA scheme who are in receipt of disability allowance and only 4 households who are in Mobility Group 3.

A recent EA conducted in July 2014 on the retendering of the HALS scheme, identified that in the last 3 years, 3 households had been accommodated in adapted properties.

In line with the TA Placement Policy, no negative impact has been identified in relation to homeless households that have a member with a disability as they are likely to be housed

locally in line with the TA Placement Policy. Additionally households who have a special disability requirement are not impacted as they will be awarded a higher banding and are most likely to be allocated a social let locally within a year. In the instances where the needs of a disabled person need further consideration, then we have an allocations panel who will hear recommendations from housing and social care caseworkers.

Gender Reassignment

Housing management systems currently do collect information on gender reassignment and civil partnership in addition to the other protected characteristics, but due to its recent introduction, these data fields are not populated sufficiently for analysis to be conducted. In part this reflects the fact that this data was not collected at the time the household applied. Future monitoring information will provide better information about this group. However, no specific impact has been identified in relation to this cohort.

Pregnancy and Maternity

Pregnancy is classified as a priority need when determining if a household is eligible for assistance under the Housing Act 1996. This means only families with children or expectant mothers will be eligible to access this TA scheme. There are 0 households with a child under 6 months who are possibly in the maternity phase although this may not have been the case when the offer of TA was made. All 133 households do however have children.

In line with the TA Placement policy, there will be a positive impact on households with a child who is enrolled to take an exam within 6 months as they will be accommodated within 60 minutes of their school or college (where practicable).

Race

A sensitive and flexible approach is taken when meeting clients' housing needs to ensure adequate and suitable provision is made. A large number of those who are accommodated under the PMA scheme are Black (African = 25, Caribbean = 18, Other = 10) as well as White (14).

Row Labels	Count of UAI	%
A White – British	8	0.070796
C White – other	14	0.123894
F Mixed - White and Asian	3	0.026549
H Asian or Asian British - Indian	2	0.017699
J Asian or Asian British - Pakistani	2	0.017699
L Asian or Asian British - Other	8	0.070796
M Black or Black British - Caribbean	18	0.159292
N Black or Black British - African	25	0.221239
P Black or Black British - other	10	0.088496

S Other	5	0.044248
Z Not Stated	17	0.150442
(blank)	1	0.00885
Grand Total	113	1

It should be noted that BAME households are over-represented amongst homeless households on the Housing Register. The policy will positively impact this cohort because they are in the majority in the households in TA. This means that they will likely fit the criteria to remain in London or Brent as defined by the TA Placement Policy.

Religion

No specific impacts have been identified in relation to this group as there is insufficient data to undertake an effective analysis and further investigation will be required. As stated previously, future monitoring information will provide better information about this group.

Current data held is insufficient. Of the 113, 106 have not indicated religion and only 6 have indicated religion which is a 50% split between Christianity and Muslim.

The Brent 2011 Census gives us an idea of the religious profile of the borough. The statistics that Christians make up the largest faith group at 41% compared to Muslims (19%). Hindus (18%) and 'No religion' (11%). of the population.

Households in PMA by religion	Count	
Christian	3	2.65%
Muslim	3	2.65%
Religion Not Stated	1	0.88%
(blank)	106	93.81%
Grand Total	113	100.00%

Sex/Gender

There is insufficient data to undertake an effective analysis. Future monitoring information will provide better information about this group.

It should however be noted that application by the women of the household is actively encouraged when applying as homeless. Additionally, national statistics also show that the biggest demand group amongst homeless households is female lone parents [ref: Statutory Homeless report, DCLG]. Due to over representation, it is likely there is a positive impact on women where they head households who fit the criteria to remain in Greater London and in Brent in-line with the TA Placement Policy.

Sexual Orientation

Households in PMA by sexual orientation	Count of UAI	
Heterosexual	6	5.31%
Not stated	1	0.88%
(blank)	106	93.81%
Grand Total	113	100.00%

No specific impacts have been identified in relation to this group as there is insufficient data to undertake an effective analysis and further investigation will be required. Currently our data indicates that nearly 94% of data on sexuality is “unknown”. As stated previously, future monitoring information will provide better information about this group.

Please give details of the evidence you have used:

- Locata report on clients currently housed in PMA
- <https://www.gov.uk/government/publications/statutory-homelessness-in-england-january-to-march-2014>
- Brent 2011 Census Profile

- **4. Describe how the policy will impact on the Council’s duty to have due regard to the need to:**
- **Eliminate discrimination (including indirect discrimination), harassment and victimisation;**
- The council will allocate TA in line with Brent’s TA Placement Policy (see Appendix 1) which will ensure that everyone’s housing need is met in a fair, consistent and non discriminatory manner.
- The specification also includes Brent’s commitment to Equality and Diversity in Procurement and states clearly the commitment we expect from Provider 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.
- Advice and assistance will be provided by Brent Council in the event of any queries or complaints with regards to Provider conduct.
- Once clients are accepted under the Housing Act 96, they are allocated a TA Support Officer (TASO). The TASO acts as the client’s caseworker and assists with undertaking reviews on the suitability of the TA offer (should the client feel the accommodation is not suitable, the TASO would investigate the merits of the suitability review), fear of violence investigations and works with accommodation providers and other agencies to resolve complaints and tenancy support issues including claims of harassment or discrimination.

- As part of the tender process, we will also be asking Bidders to demonstrate how effectively they deal with tenancy and housing management issues e.g. dealing with complaints of anti social behaviour (including discrimination, victimisation and harassment) and actions taken to resolve the situation or to mitigate the impact on the client. Providers are also contractually required to have a complaints procedure to prevent unlawful discrimination and to promote equal opportunities for everyone; Bidders also need to ensure that all staff should be CRB checked.
- As part of their tender response, each provider is asked to submit a welcome pack. This outlines all the information a tenant will require not only about their new home, local area and amenities but also information about the Provider. It should include their equal opportunities policy and how to make a complaint if a tenant feels they have been treated unfairly. Bidders will be required to provide this in a range of formats to meet the individual's communication needs.
- There will be a requirement for Bidders to demonstrate their commitment to our Equality and Diversity Policy by ensuring that their services are accessible to all users and take into account service user's individual needs. This includes using sign language or translation services, using large print or Braille, ensuring they have hearing loops for hearing impaired customers and ensuring their offices are accessible to wheelchair users. This will be monitored as part of the monthly performance indicators which includes equalities data as part of complaints targets.
- Bidders will also be required to ensure that there are appropriate systems in place to ensure that the communication needs of service users are reflected on systems which may relate to maintenance so that contractors are made aware.
- During the tender process the Providers will be evaluated on both procurement and tenancy management issues. This includes how their company policies and procedures deal with complaints of harassment and nuisance (this includes sexual, racial and transphobic harassment, domestic violence, anti-social behaviour and homophobia). The number of harassment complaints is also one of the performance indicators upon which their performance is regularly monitored. All complaints of harassment would be dealt with by the Provider in the first instance in line with their company's complaints procedure. If the client is not satisfied with the outcome, they are then able to contact their caseworker at Brent Council. Providers are also contractually required to have a complaints procedure to prevent unlawful discrimination and to promote equal opportunities for everyone.
- Regular performance monitoring allows the Council to ensure there is a consistent approach to complaints and that the housing need is being provided with a caring and responsive approach with regards to complaints of harassment.

(a) Advance equality of opportunity;

- The TA Placement Policy takes into account educational, welfare and medical needs of households before deciding whether to place in or out of borough. This criterion ensures that certain vulnerable groups can remain in borough.
- Regular performance monitoring will enable the Council to ensure there is a consistent approach to complaints and that the housing need is being provided with a caring and responsive approach with regards to complaints of harassment, discrimination or victimisation.
- Ensuring better monitoring of families who are housed through this scheme by reviewing processes to ensure that protected characteristics are captured by all staff via the current monitoring mechanisms currently in place.

(b) Foster good relations

As above

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 carried out with Homeless Households in bands A-C who are currently residing in temporary accommodation (TA).

A TA survey was conducted in October 2014 to measure customer satisfaction of TA Providers and also to identify any areas which needed to be targeted during the tender process.

ii) What methods did you use?

An on-line survey was sent out to over 3000 applicants, **295** responses were received. Due to time constraints the consultation period was only held for two weeks.

It should be stressed that the responses are likely, particularly when additional comments are taken into account, to reflect the circumstances of individual applicant. This is understandable but suggests a need for caution when interpreting the data.

iii) What did you find out

Question 1 - During home visits, how do you feel about how managing agents: Pre-arrange a time to visit the property?	% Total	Count
Very dissatisfied	12.54%	37
Dissatisfied	12.88%	38
Neither satisfied nor dissatisfied	18.98%	56
Satisfied	36.27%	107
Very satisfied	16.27%	48
No Response	3.05%	9
Total	100.00%	295

Question 2 - During home visits, how do you feel about how managing agents: Show helpfulness?	% Total	Count
Very dissatisfied	14.24%	42
Dissatisfied	11.53%	34
Neither satisfied nor dissatisfied	16.61%	49
Satisfied	30.85%	91
Very satisfied	13.22%	39
No Response	13.56%	40
Total	100.00%	295

Question 3 - Overall, how satisfied are you with the way in which the managing agent responds to: Repairs?	% Total	Count
Very dissatisfied	20.00%	59
Dissatisfied	22.37%	66
Neither satisfied nor dissatisfied	13.56%	40
Satisfied	29.49%	87
Very satisfied	12.88%	38
No Response	1.69%	5
Total	100.00%	295

Question 4 - Overall, how satisfied are you with the way in which the managing agent responds to: Anti-social behaviour?	% Total	Count
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Very dissatisfied	9.83%	29
Dissatisfied	8.47%	25
Neither satisfied nor dissatisfied	28.47%	84
Satisfied	27.12%	80
Very satisfied	12.88%	38
No Response	13.22%	39
Total	100.00%	295

Question 5 - Overall, how satisfied are you with the way in which the managing agent responds to: General tenancy issues?	% Total	Count
Very dissatisfied	15.25%	45
Dissatisfied	11.19%	33
Neither satisfied nor dissatisfied	24.07%	71
Satisfied	28.47%	84
Very satisfied	9.83%	29
No Response	11.19%	33
Total	100.00%	295

Question 6 - Have you ever complained to the managing agents (not Brent Council) that you have been the victim of anti-social behaviour, homophobia, bullying or harassment in your home?	Count
Yes	36
No	252
No Response	7
Total	295

Question 7 - Were you satisfied with the action taken by the managing agent (not Brent Council) to resolve your complaint?	Count
Yes	6
No	30
Total	36

Question 8 - Have you ever been the victim of discrimination or harassment by your managing agent based on the following equality characteristics? (please select all that apply)	Count
Age	4
Disability	5
Gender reassignment or identity	3
Pregnancy and maternity	2
Race	7
Religion or belief	5
Sex (formerly known as Gender)	1
Sexual orientation	0
Total	27

Question 7 - Did you complain to the managing agent?	Count
Yes	9
No	13
No Response	5
Total	27

Question 7a - Were you satisfied with the outcome?	Count
Yes	6
No	12
No Response	18
Total	27

iv) How have you used the information gathered?

The contract specification already contains repairs timetables that the Housing Providers have to adhere to. In addition they are also required to provide KPIs indicating their repairs performance. However due to the level of applicants who expressed dissatisfaction with the way agents deal with repairs, we will also carry out spot checks by asking for customer feedback once a repair is completed and taking up unresolved issues or customer feedback with the Contractor.

In addition, we will carry out annual TA satisfaction surveys to monitor customer feedback with regards to Providers' performance. Any issues will be brought up at the West London

Contract meetings which are held quarterly.

We are also in discussions with our West London partners to consider the possibility of adding an equalities question to the tender method statement to allow us to evaluate the Provider on how they investigate and resolve complaints from a client who is the victim of harassment based on some of the protected characteristics.

v) How has it affected your policy?

The results of the survey have been used to inform the tender, specifically the tender method statements which are used to evaluate the Provider's ability, competence and suitability. KPIs currently monitor repairs performance but due to the high level of dissatisfaction indicated in the TA Survey, additional measure, such as TA Satisfaction Surveys will also be implemented to better monitor performance.

6. Have you have 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 give details of the evidence you have used:

Results from the TA Survey
Locata report on homeless households in TA

7. Analysis summary

Please tick boxes to summarise the findings of your analysis.

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

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

- The terms will ensure clients placed by the Council receive the best possible service in accordance with their individual needs and requirements and there is a clear understanding of the relationship between the Council and the provider.
- The tender process will also include method statements which allow the panel to assess how well the Provider is able to meet our clients' needs. Bidders are required to demonstrate their experience by providing examples of how they will deal with tenancy and housing management issues. The panel will also be assessing Providers to ensure their staff is CRB checked.
- The council will allocate TA in line with Brent's TA Placement Policy which will ensure that everyone's housing need is met in a fair, consistent and non discriminatory manner.
- The specification of the PSA contract will ensure that properties procured by Contractors will meet rigorous standards, including adhering to the "minimum property standard" as defined in the PSA specification. This specifies the standards each property must meet before they can be accepted for the HALS scheme. The Contractor should ensure (amongst other things) that all safety certificates are valid for the property, that the property has buildings insurance that the property adheres to current fire regulations.
- The specification also includes Brent's commitment to Equality and Diversity in Procurement and states clearly the commitment we expect from Provider 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.

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.

There will be on-going performance monitoring via quarterly contract meetings held with the Providers and by reviewing their KPIs which are submitted on a monthly basis. The number of complaints would also be used as a monitoring mechanism to ensure customers have been treated fairly and have not experienced discrimination on the basis of ethnic origin, age, gender, faith, sexuality and disability.

Brent Council is committed to the principle of equal opportunities in the delivery of all of its services. Brent Council will seek to ensure that the PSA scheme is applied in a manner that is fair to all sections of the community regardless of nationality, ethnic origin, marital status, age, gender or disability.

Brent Council and its partners will be responsive, accessible and sensitive to the needs of all applicants. They will not tolerate prejudice and discrimination and will actively promote equality.

Applicants will be invited to indicate if they wish to make use of the Council's translation and interpretation services, and if they require other special services as a result of visual impairment, hearing difficulties or other disability.

Confidential interview facilities are provided at all Customer Service Centres and the Brent Civic centre, all of which are wheelchair accessible. Home visits will be carried out as required, especially where the applicant has a disability or mobility problems.

All applicants for housing or re-housing will be asked to provide details of ethnic origin, age, gender, faith, sexuality and disability. This will not, however, be a requirement for acceptance of assistance. Diversity records will be kept and monitored on a regular and systematic basis to ensure properties are being offered and allocated fairly.

Regular performance monitoring will ensure that the scheme does not operate in a manner that disadvantages or discriminates against any particular group.

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
Monitoring of TA Occupancy	March 2015	Laurence Coaker	Comprehensive monitoring across all protected groups, including those where current data is inadequate and those where more detailed analysis is required		
Mapping of ethnic data	March 2015	Laurence Coaker	Increased accuracy of information on ethnicity		
Increased customer consultation	N/A	N/A	Ensure that future consultations are carried out over a more reasonable time period i.e. minimum of 4 weeks.		

			To introduce other forms of consultation other than on-line.		

Please forward to the Corporate Diversity Team for auditing.