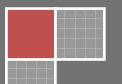


Equality Analysis



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 (out of London)	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: Arleen brown Title: Equality Officer Date : Contact No:0208 937 1190 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 Sector Accommodation scheme (PSA) as the current contract is due to expire in July 2015. A previous EA was carried out in 2012 when the first scheme was introduced to mitigate the impact of the Overall Benefit Caps (OBC), LHA reforms and Universal Credit which affected how temporary accommodation (TA) would be allocated and managed. Brent responded to these changes by inviting tenders from Contractors (Housing Providers) to procure affordable accommodation under the Private Sector Accommodation (PSA) scheme for those households who would be directly affected by the benefit caps. This

applied mainly to larger households that required two, three, four and five bed properties. The Council will be retendering this contract as a Dynamic Purchasing System for the Procurement and Management of Temporary Accommodation (outside 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 Sector Accommodation (PSA) scheme is a type of Private Sector Leasing Scheme.

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.

This duty to provide accommodation for accepted homeless households may be discharged by the council providing a property in the Private Rented Sector (PRS) for all households who made their application on or after 9 November 2012. Where a duty has been accepted prior to 9 November 2012, duty can only be discharged through securing social housing. For the purpose of this EA, we are concentrating on the families who were accepted pre 9 November 2012 and are currently residing in TA as it is this cohort who are impacted by this scheme.

At the time of writing there are 3,400 homeless households in various TA schemes. Of these, 2844 are in TA with an acceptance date of pre 9 November 2012.

For these 2844, sustaining their current TA is at risk because of the challenges welfare reform have put on the housing market. HB regulations have created a challenge on Brent Council to source local affordable accommodation. The two main restrictions are:

The LHA reforms which were introduced in April 2011 and 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.

Additionally the Overall Benefit Cap (OBC) was introduced in August 2013 to the benefit claimed by workless households. The cap limits the total amount of benefit payable to £500 per week for a family and £350 per week for a single person.

The result of these two pressures means that we see an increase in the number of households being evicted from TA.

An additional pressure to sourcing in-borough accommodation is the end of the current Housing Association Leased 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.

Within the TA population there are 358 households who are affected by the OBC thus making their current accommodation unaffordable. The Council is using Discretionary Housing payment (DHP) to help meet the shortfall between rents and the capped Housing Benefit receipt. However, this is not a sustainable position for the households or the Council, with no guarantee that the DHP budget will remain at the current high level in 2015/16 and beyond.

A report was presented to Cabinet in November 2014 to approve an increase in the number of social lets made to homeless households from 60% up to 80%. More social housing therefore will be let to homeless households 2014/15 thus mitigating the impact of the OBC on households currently living in TA that is no longer affordable:

Distribution of Lets by Property size to demand groups

	Bedsit	1 bed	2 bed	3 bed	4 bed +	Total
Housing Register (Homeless)	0	167	228	102	23	520
Housing Register	19	15	20	9	2	65
Transfers	3	27	37	17	4	87
Total	23	209	285	127	29	673

Where households do not secure social housing in Brent, it will be necessary to relocate these households to more affordable suitable TA, as it will not be possible to sustain them in their current temporary accommodation.

Before a household is relocated to cheaper temporary accommodation outside of the borough, a full suitability check, including safeguard checks with Children's Social Care will be undertaken on each individual case. If a household is identified as having to remain in Brent due to exceptional social care, welfare, medical or other exceptional circumstance, then DHP funds will continue to be used to meet the shortfall in rent while a longer term solution is sought.

The PSA scheme offers an alternative option of self contained good quality accommodation outside of London in areas where rent levels remain affordable within the LHA caps for households.

Prior to the implementation of the scheme in 2013, to ensure suitable areas of procurement were identified outside of London, the Council utilised the services of a consultancy to identify suitable areas based on a favourable relationship between the LHA rate and the market rents.

Other areas of research included ethnic composition of area, economic deprivation, education levels, local support agencies and travel back to Brent. In the last 12 months, clients have been accommodated in areas such as Birmingham, Slough, Luton, High Wycombe – areas which were recommended by the consultancy agency. This research indicates there are some areas that are clearly unaffordable within the cap. There is also a clear relationship between what is affordable and family size. (see Appendix 2a for Procurement Bands).

The existing contract was awarded to 15 Housing providers after a competitive tender in April 2013 for a period of two years. All properties procured under this scheme are outside of London and the contract is due to expire in April 2015.

The scope of services, which will be provided by multiple Contractors who are selected during the tendering process, 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 principal aim of the scheme is 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
- To mitigate the financial risk to the Council and housing applicants, arising from the

impact of the welfare reform.

The intention of the PSA scheme is to continue to meet the gap between the need for housing and the supply of affordable temporary accommodation for households who require two three, four and five bed properties who are evicted from their current affordable in Brent.

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 (see Appendix 1) 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.

As previously stated, this equalities analysis concentrates on the 2844 applicants in TA where the Council accepted a duty under homelessness legislation prior to 9 November 2012.

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

The Overall Benefit Cap only applies to people of working age hence there will be a negative impact on clients aged 65 or under who are not working. Applications from homeless households appear to be highest amongst the under 45 year olds, with fewer applicants aged over 60 years.

Employment is one of the most direct ways for households to avoid the impact of the OBC and the Council has established an extensive programme that is focussed strongly on those affected by the welfare reforms and further tailoring of commissioned Job brokerage services is being examined to improve outcomes. Although the aim of the welfare reforms was to incentivise work, even those in employment will still be impacted due to the LHA caps and the difficulties faced with procuring accommodation within the borough.

One of the measures to mitigate the impact of the LHA caps will be to offer increased priority to households who are employed by awarding them an additional 5 years waiting time on their housing application e.g. if a household applied in 2006, they will be awarded

a new date of 2001 thus moving them to a higher position within their band on Locata (Brent's choice based lettings scheme).

Homeless households by age	Count	
65 and over	100	3.52%
Between 45 and 49	465	16.35%
Between 50 and 54	297	10.44%
Between 55 and 59	151	5.31%
Between 60 and 64	69	2.43%
Under 45	1762	61.95%
Grand Total	2844	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.

There are 165 relevant applications as detailed below:

Homeless households by mobility category		
Row Labels	Count	
1	5	3.4%
2	6	3.6%
3	154	93%
Grand Total	165	100.00%

No specific impacts have been identified in relation to this group as applicants in receipt of disability benefits are exempt from the Overall Benefit Caps. Households who have a special disability requirement are not impacted as they will be awarded a higher banding and are most likely to be rehoused locally. 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.

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.

Homeless households who stated they were pregnant at the time of the application		
Row Labels	Count	
No	128	4.50%
Yes	16	0.56%
Blank/Unknown	2700	95%
Grand Total	2844	100.00%

We have also identified there are approximately 30 households with a child under 6 months who are possibly in the maternity phase. It should be noted that at the time they

receive an offer of TA or a social let we do not know how old the youngest child will be. However we recognise that moving a household with a young baby away from known services and support networks is more likely to have an adverse impact. We will aim to mitigate this impact by setting up links with family support groups, childcare services in areas where the accommodation is sourced.

The biggest group by far is still unknown in “other” and as stated previously, future monitoring arrangements will provide better information about this group.

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 negatively impacted are Black (African = 17.37%, Caribbean = 8.09%, Asian Other = 7.21%) as well as White (2.92%) but by far the biggest is still unknown in “other”. A data exercise is currently underway to improve accuracy of our ethnic data. However as noted previously, this data relates to households who applied pre 9 November 2012 hence data fields not being sufficiently populated.

Homeless households by ethnicity	Count	
A White - British	83	2.92%
B White - Irish	9	0.32%
C White - other	138	4.85%
D Mixed - White and Black Caribbean	20	0.70%
E Mixed - White and Black African	19	0.67%
F Mixed - White and Asian	5	0.18%
G Mixed - other	9	0.32%
H Asian or Asian British - Indian	70	2.46%
J Asian or Asian British - Pakistani	74	2.60%
K Asian or Asian British - Bangladeshi	14	0.49%
L Asian or Asian British - Other	205	7.21%
M Black or Black British - Caribbean	230	8.09%
N Black or Black British - African	494	17.37%
P Black or Black British - other	76	2.67%
R Chinese	4	0.14%
S Other	1372	48.24%
Z Not Stated	13	0.46%
(blank)	9	0.32%
Grand Total	2844	100.00%

As noted in the table entitled “Distribution of Lets by Property size to demand groups” during 2014/2015 it is projected that 520 out of 673 social lets will be allocated to homeless households who have been waiting the longest. The increase in social lets to homeless households will mitigate the impact on this cohort who are over represented within the homeless population.

Where families will need to be relocated, cultural considerations have been taken into account such as ethnic composition of the area, places of worship, community faith groups, local support agencies as well as travel time back to Brent, all of which are likely to have a positive impact on BAME families who are relocated.

Religion

There is insufficient data to undertake an effective analysis and further investigation will be required. Future monitoring information will provide better information about this group.

However, as previously stated, where families will need to be relocated, cultural considerations have been taken into account such as places of worship and community faith groups, all of which are likely to have a neutral impact on religion as we have considered the religious needs of households and have promoted cohesion amongst this protected group.

Homeless households by religion	Count	Count of UAI
Christian	70	2.46%
Hindu	3	0.11%
Muslim	87	3.06%
No Religion	9	0.32%
Religion Not Stated	23	0.81%
Sikh	1	0.04%
(blank)	2651	93.21%
Grand Total	2844	100.00%

Sex/Gender

Application by the women of the household is actively encouraged when applying as homeless hence they are over represented as indicated by the table below.

Row Labels	Count	
Female	2088	73.42%
Male	751	26.41%
(blank)	5	0.18%
Grand Total	2844	100.00%

National statistics also show that the biggest demand group amongst homeless households is female lone parents [ref: Statutory Homeless report, DCLG].

Although there is a negative impact on women, the increased social lets (520 out of 673 for 2014/15) for accepted homeless households who have been waiting the

longest will serve to mitigate this impact as women are over-represented in the homeless population.

Sexual Orientation

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 93% 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 TA in bands A-C
- <https://www.gov.uk/government/publications/statutory-homelessness-in-england-january-to-march-2014>

- **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 and 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.
- 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;

- There is a significant shortage of affordable TA in Brent to meet current demand. Furthermore changes in Housing Benefits and Local Housing Allowance have swiftly resulted in an increase in the number of households approaching and being accepted by Brent as homeless. The council will, therefore, be required to find affordable accommodation outside of Brent as well as outside of London.

However, the council will endeavour to mitigate the full impacts of welfare reforms and overall benefit caps by ensuring Contractors provide a comprehensive welcome pack for every family. Each welcome pack will include the following:

The Contractor's name, address, telephone number and office opening hours

Contact details for repairs and maintenance (including emergency repairs service)

Information on local facilities and amenities including:

GPs and how to register

Hospitals

Schools and how to apply

Local transport links

Shops and supermarkets

Post Offices and banks

Job Centre plus

Faith and other community groups

Places of worship

Local authority offices

Furthermore, Contractors will also carry out an initial 7 day visit followed by visits once a month for the first six months on all households who are placed outside of London. This will be reinforced by the employment of two TA Support officers who will carry out a similar function. The aim is to provide a tailored support package for household to ensure each household is treated fairly and that their needs are fully met.

- 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 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
Very dissatisfied	12.54%
Dissatisfied	12.88%
Neither satisfied nor dissatisfied	18.98%
Satisfied	36.27%
Very satisfied	16.27%
No Response	3.05%
Total	100.00%

Question 2 - During home visits, how do you feel about how managing agents: Show helpfulness?	% Total
Very dissatisfied	14.24%
Dissatisfied	11.53%
Neither satisfied nor dissatisfied	16.61%
Satisfied	30.85%
Very satisfied	13.22%
No Response	13.56%

Total	100.00%
Question 3 - Overall, how satisfied are you with the way in which the managing agent responds to: Repairs?	% Total
Very dissatisfied	20.00%
Dissatisfied	22.37%
Neither satisfied nor dissatisfied	13.56%
Satisfied	29.49%
Very satisfied	12.88%
No Response	1.69%
Total	100.00%
Question 4 - Overall, how satisfied are you with the way in which the managing agent responds to: Anti-social behaviour?	
	% Total
Very dissatisfied	9.83%
Dissatisfied	8.47%
Neither satisfied nor dissatisfied	28.47%
Satisfied	27.12%
Very satisfied	12.88%
No Response	13.22%
Total	100.00%
Question 5 - Overall, how satisfied are you with the way in which the managing agent responds to: General tenancy issues?	
	% Total
Number of Responses	88.81%
Very dissatisfied	15.25%
Dissatisfied	11.19%
Neither satisfied nor dissatisfied	24.07%
Satisfied	28.47%
Very satisfied	9.83%
No Response	11.19%
Total	100.00%

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?	
	% Total
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?	
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	Count
Yes	9
No	13
No Response	5
Total	27

Question 7a - Were you satisfied with the outcome?	
	% Total
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.

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.

Potential negative impacts have been identified and are addressed in Section 2 of this EA.

In summary the main risk of negative impact arises from relocating families out of London. BAME households are negatively impacted but cultural considerations have been taken into account when identifying areas of relocation thus mitigating the impact on this cohort.

There is a negative impact on women, however the increased lets to accepted homeless households neutralises this impact as women are over-represented in the homeless population.

We recognise that relocating with a young baby can be stressful and likely to have an adverse impact on these households. We aim to mitigate this impact by setting up links with family support groups and childcare services in areas where the accommodation is sourced.

Please give details of the evidence you have used:

Results from the TA Survey
Locata report

7. Analysis summary

Please tick boxes to summarise the findings of your analysis.

Protected Group	Positive impact	Adverse impact	Neutral
Age		X (negative for under 65s not working, highest amongst under 45's)	X
Disability			X
Gender re-assignment			X(unknown due to lack of monitoring)
Marriage and civil partnership			X (unknown due to lack of monitoring)
Pregnancy and maternity		X	X
Race		X	X
Religion or belief			X
Sex		x	x
Sexual orientation			X(unknown due to lack of monitoring)

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

- It should be noted that this scheme was initially created to mitigate the impact of the Welfare Reforms and is targeted towards for large households who cannot afford to live in London due to the benefit caps. Housing Options will be limited for larger families due to high levels of unemployment and the introduction of the benefit caps. Unemployed households requiring 3 or more bedroom (and in some cases two bedroom) property are unlikely to be accommodated in London. Whilst the Council's ability to mitigate the impact of the benefit caps that drive out of London procurement is limited, the criteria for out of London placements is detailed extensively in Brent's TA Placement Policy. The council has also utilised the services of a consultancy to identify suitable areas of procurement outside of London. Their research took various factors into account such as affordability, ethnic composition of area, economic deprivation, education levels, local support agencies and travel back to Brent. In addition, Contractors will provide Welcome Packs which will give an overview of the area, amenities, schools and doctors. This aims to mitigate any potential impacts of the Overall Benefit Caps, LHA Reforms and Universal Credit is balanced towards ensuring that housing need is met in a fair, consistent and non discriminatory manner.
- 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.