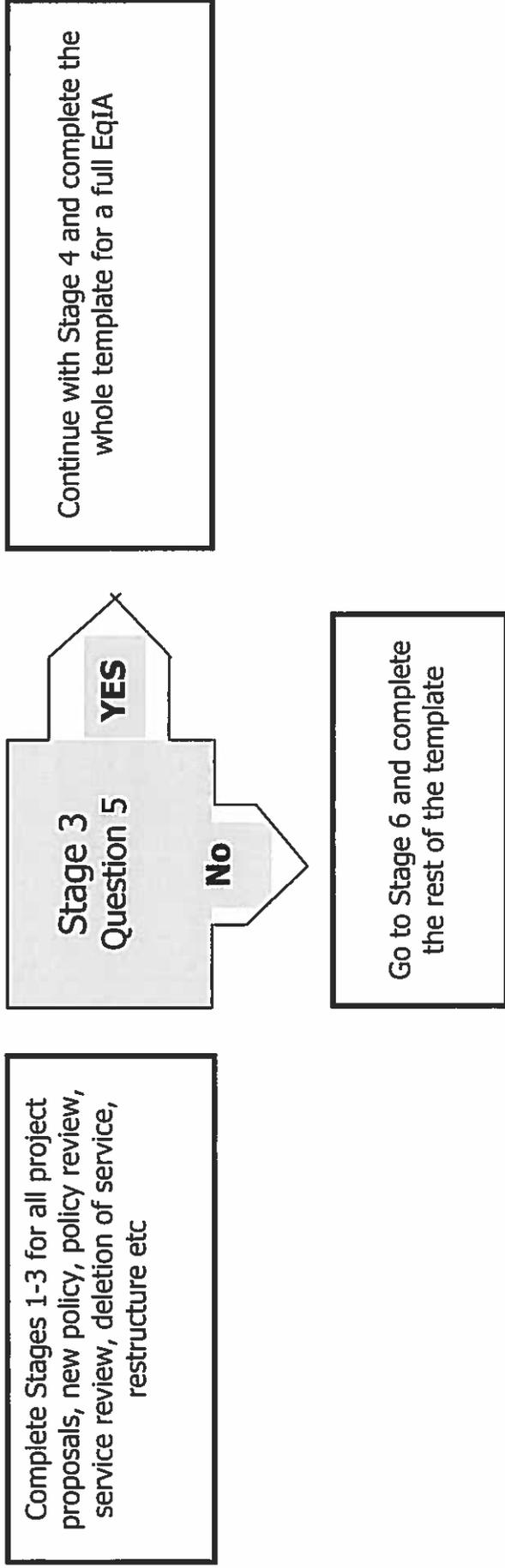


Equality Impact Assessment Template

The Council has revised and simplified its Equality Impact Assessment process (EqIA). There is now just one Template. Lead Officers will need to complete **Stages 1-3** to determine whether a full EqIA is required and the need to complete the whole template.



- In order to complete this assessment, it is important that you have read the Corporate Guidelines on EqIAs and preferably completed the EqIA E-learning Module.
- You are also encouraged to refer to the EqIA Template with Guidance Notes to assist you in completing this template.
- **SIGN OFF:** All EqIAs need to be signed off by your Directorate Equality Task Groups. EqIAs relating to Cabinet Reports need to be submitted to the EqIA Quality Assurance Group at least one month before your Cabinet Report date. This group meets on the first Monday of each month.
- Legal will NOT accept any reports without a fully completed, Quality Assured and signed off EqIA.

The EqIA Guidance, Template and sign off process is available on the Hub under Equality and Diversity

Equality Impact Assessment (EqIA) Template

Type of Decision: Tick ✓		Cabinet	Portfolio Holder	Other (explain)
Date decision to be taken:		19 November 2015		
Value of savings to be made (if applicable):				
Title of Project:		Review of Housing Allocations Scheme and introduction of a Temporary Accommodation Procurement Strategy and a Temporary Accommodation Allocation Policy		
Directorate / Service responsible:		Housing		
Name and job title of Lead Officer:		Jon Dalton, Head of Housing Needs		
Name & contact details of the other persons involved in the assessment:		Meghan Zinkewich-Peotti, Housing Strategy Project Manager Meghan.zinkewich-peotti@harrow.gov.uk Jacky Souter, Housing Needs Operations Manager Paul Allen, Senior Team Manager, Housing Advice and Assessment Other members of the Housing Needs team Business Intelligence Unit Resident Services team		
Date of assessment (including review dates):		1 October 2015		

Stage 1: Overview

Changes to Allocations Scheme

When we introduced the new Housing Allocations Scheme 2013 we indicated that we would review how it was working once it had been in operation and bedded down.

1. What are you trying to do?

(Explain your proposals here e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)

We have identified some anomalies the scheme has created and there have been some new interpretations of the relevant law through the courts so we are now proposing a number of changes to the scheme.

With recent announcements by the government, we think the supply of social housing in Harrow is going to reduce even further over the next few years so the policy needs to reflect the limited options there are for offering social housing to home seekers.

The lack of affordable housing and impact of the ongoing welfare reforms mean that some households will need to move out of Harrow and/or out of London. This is more

likely to affect larger families and those not in settled employment.

We are proposing 13 changes to the Housing Allocations Scheme:

1. Removal of the 5 year rule residency rule for applicants who are assessed as having a significant housing need but have not been resident in the borough continuously for at least 5 years
2. Change band A* to band A+
3. Amendments to the wording of the exclusion section
4. To no longer give band A priority to households who are overcrowded by 2 bedrooms or more living in the private sector
5. To no longer give this band B priority to accepted homeless and qualifying offer applicants living outside of the M25 area
6. Extension of the transitional relief arrangements
7. Change to the debt and arrears policy
8. Removal of the low income criteria
9. Increase banding to A/+ for tenancy succession/unauthorised occupiers - approved for alternative social housing
10. Removal of strategic aim f in Appendix 2 – improving neighbourhoods
11. Increase the options for direct offers of public rented housing (extend to include accepted homeless households)
12. Cases where there is an urgent need to move and the council are unable to provide a timely offer of suitable public rented housing to be dealt with under homelessness rather than awarding priority on the housing register

13. Reduction of banding in cases where there has been a deliberate change of circumstances which has resulted in the worsening of a household's circumstances

A comprehensive EqIA was completed in March 2013 when the new Allocations Scheme was introduced. The scheme affected a large number of applicants. The consultation involved a broad range of residents and stakeholders.

The 13 changes proposed affect a much smaller number of applicants.

New Temporary Accommodation Procurement Strategy

We are introducing a Temporary Accommodation Procurement Strategy for obtaining accommodation for homeless households to whom we have a statutory duty to assist or accommodate once assessed. This is as a result of the Supreme Court judgement on Nzolameso v City of Westminster. We already procure temporary accommodation for homeless households but this document formalises our approach into a new strategy document.

New Temporary Accommodation Allocation Policy

We are introducing a Temporary Accommodation Allocation Policy, which reflects the limited availability of local accommodation, and this will replace the guidance in the Appendix of the Homelessness Strategy (2013). This is also as a result of the Supreme Court judgement on Nzolameso v City of Westminster. We already allocate temporary accommodation but this document formalises our approach into a new policy document.

2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)	Residents / Service Users	✓	Partners		Stakeholders	
	Staff		Age	✓	Disability	✓
	Gender Reassignment	✓	Marriage and Civil Partnership	✓	Pregnancy and Maternity	✓

Race	✓	Religion or Belief	✓	Sex	✓
Sexual Orientation	✓	Other			
<p>The other stakeholders are other Council departments (Adults and Children's Services), Registered Providers, organisations who support and advise homeless people, the voluntary and community sector and residents groups.</p> <p>They have been involved in consultation and the assessment through:</p> <ul style="list-style-type: none"> • Consultation event 1 September 2015- feedback from presentations, roundtable discussions and from individual delegates- 17 delegates attended (from Registered Providers, organisations who support and advise homeless people, the voluntary and community sector and residents groups) • Consultation with HFTRA on 23 September 2015- 2 representatives attended • Consultation by email (links to documents and surveys)- response received from Harrow Law Centre and LBH Resident Services • Consultation online (also available by post and in person) on the Harrow website and Locata- information sent to all Council tenants and leaseholders- 14 responses received 					✓
Stage 2: Evidence & Data Analysis					
<p>3. Is the responsibility shared with another directorate, authority or organisation? If so:</p> <ul style="list-style-type: none"> • Who are the partners? • Who has the overall responsibility? • How have they been involved in the assessment? 					
Stage 2: Evidence & Data Analysis					
<p>4. What evidence is available to assess the potential impact of your proposals? This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys, press reports, letters from residents and complaints etc. Where possible include data on the nine Protected Characteristics.</p> <p>(Where you have gaps (data is not available/being collated for any Protected Characteristic), you may need to include this as an action to address in your Improvement Action Plan at Stage 6)</p>					
Protected Characteristic	Evidence		Analysis & Impact		
Age (including carers of young/older people)	<p>Harrow's population as at 2011: 6.7% of residents were aged four and under, 13.5% were aged 5 to 15, 65.7% were of working age (16 to 64) and 14.1% were aged 65 and over. 18% of Harrow's households are comprised solely of residents aged 65 and over.</p> <p>In 2014/2015 there were 1654 homeless housing</p>		<p><u>Changes to Allocations Scheme</u></p> <p>Analysis of the current applicants whose priority will be downgraded as a result of the proposed changes shows no bias against any one age group.</p> <p><u>New Temporary Accommodation Procurement Strategy &</u></p>		

applicants:

Age	Number of applicants	%
Under 16	0	0
16-17	5	0.3
18 – 19	39	2.4
20 – 29	394	23.8
30 – 39	505	30.5
40 – 49	411	24.8
50 – 59	186	11.3
Over 60	114	6.9
Total	1654	

The majority of homeless housing applicants were aged 30-39, followed by 40-49 and 20-29.

There were 283 accepted homeless households:

Age	Number of acceptances	%
Under 16	0	0
16-17	0	0
18 – 19	2	0.7
20 – 29	69	24.4
30 – 39	97	34.3
40 – 49	88	31.1
50 – 59	18	6.3
Over 60	9	3.2
Total	283	

The majority of accepted homeless households were aged 30-39, followed by 40-49 and 20-29.

Allocation Policy

The lack of affordable housing and impact of the ongoing welfare reforms mean that some households will need to move out of Harrow and/or out of London. This is more likely to affect larger families and those not in settled employment. While the policy outlines our approach to applicants in different circumstances which are more likely to affect specific age groups, such as key stages of education and health needs, every application will be considered on a case by case basis in order to address any specific exceptional circumstances.

	<p>The feedback from the consultation did not highlight any issues related to age, other than concern for potential disruption to children at key stages of their education.</p> <p>Also older people are more likely to be under-occupiers and the council offers support and incentives to help such residents find smaller homes and release larger family homes.</p>	
<p>Disability (including carers of disabled people)</p>	<p>In 2011 14.6% of Harrow residents identified themselves as having a limiting long term illness.</p> <p>The feedback from the consultation did not highlight any issues related to disability, other than one respondent (a carer) who commented on the difficulty in finding suitable affordable accommodation. This may in part be due to the spare room subsidy (bedroom tax).</p>	<p><u>Changes to Allocations Scheme</u></p> <p>Analysis of the current applicants whose priority will be downgraded as a result of the proposed changes shows no bias against people with disabilities or their carers.</p> <p><u>New Temporary Accommodation Procurement Strategy & Allocation Policy</u></p> <p>The lack of affordable housing and impact of the ongoing welfare reforms mean that some households will need to move out of Harrow and/or out of London. This is more likely to affect larger families and those not in settled employment. While the policy outlines our approach to applicants in different circumstances which are more likely to affect specific groups, such as those with health needs, every application will be considered on a case by case basis in order to address any specific exceptional circumstances.</p>
<p>Gender Reassignment</p>	<p>There is limited data held about this protected characteristic and there was no specific feedback related to this protected characteristic from the consultation.</p>	<p><u>Changes to Allocations Scheme</u></p> <p>Analysis of the current applicants whose priority will be downgraded as a result of the proposed changes shows no bias against people who have undergone gender reassignment.</p>

<p>Marriage / Civil Partnership</p>	<p>There is limited data held about this protected characteristic and there was no specific feedback related to this protected characteristic from the consultation.</p>	<p><u>Changes to Allocations Scheme</u></p> <p>Analysis of the current applicants whose priority will be downgraded as a result of the proposed changes shows no bias against people who are married or in a civil partnership.</p>
<p>Pregnancy and Maternity</p>	<p>There is limited data held about this protected characteristic and there was no specific feedback related to this protected characteristic from the consultation.</p>	<p><u>Changes to Allocations Scheme</u></p> <p>Analysis of the current applicants whose priority will be downgraded as a result of the proposed changes shows no bias against pregnant applicants or those with infants.</p>
<p>Race</p>	<p>Harrow's population as at 2011: 44% of Harrow's usual resident population is Asian, sub-categorised as White/Asian (1.4%) Indian (26.4%) Pakistani (3.3%) Bangladeshi (0.6%) Chinese (1.1%) Other Asian (11.3%) (mainly Sri Lankan and Tamil).</p> <p>42.2% of Harrow's usual resident population is White, sub-categorised as British (30.9%) Irish (3.1%) Gypsy/Irish Traveller (0.1%) Other (8.2%) (mainly from other parts of Europe, with a large proportion from Eastern Europe, particularly Romania and Poland).</p> <p>9.7% (23,105) of Harrow's usual resident population is Black, sub-categorised as White/Black Caribbean (1%) White/Black African (0.4%) Black African (3.6%) Black Caribbean (2.8%) Other Black (1.8%).</p> <p>4.1% of residents were included in the Arab and Other grouping.</p> <p>In 2014/2015 there were 1654 homeless housing</p>	<p><u>Changes to Allocations Scheme</u></p> <p>Analysis of the current applicants whose priority will be downgraded shows that 23 households will lose band A priority as a result of the proposed change. Within this group of 23 households the proposed change appears to have an impact on more BME households (10) than non-BME households (5) though the fact that only 23 households are affected, and that 7 of these households chose not to disclose their ethnicity, makes this analysis less statistically robust.</p>

applicants:

Ethnicity	Number of applicants	%
White UK	266	16
White Irish	36	2
Irish Traveller	1	0
English	2	0
White Other	127	8
Polish	9	1
Romanian	7	0
Black UK	1	0
Black Caribbean	118	7
Black African	166	10
Somali	12	1
Black Other	34	2
Indian	92	6
Pakistani	58	4
Bangladeshi	28	2
Afghan	21	1
Sri Lankan	6	0
Chinese	2	0
Other Asian	192	12
Other	58	4
Arab	8	0
Iranian	2	0
White/Black Caribbean	25	2
White/Black African	24	1
White and Asian	15	1
Other mixed race	27	2
Not disclosed	282	17
Not available	35	2
	1654	

The majority of homeless housing applicants identified as White British, Black African and Other Asian.

There were 283 accepted homeless households:

Ethnicity	Number of acceptances	%
White UK	35	12
White Irish	4	1
White Other	21	7
Romanian	1	0
Black Caribbean	21	7
Black African	44	16
Somali	6	2
Black Other	6	2
Indian	12	4
Pakistani	8	3
Bangladeshi	3	1
Afghan	9	3
Sri Lankan	2	1
Other Asian	34	12
Other	13	5
Arab	2	1
Iranian	1	0
White/Black Caribbean	4	1
White/Black African	3	1
White and Asian	1	0
Any other mixed race	5	2
Not disclosed	48	17
Total	283	

The majority of accepted homeless households identified as Black African, Other Asian and White British.

Changes to Allocations Scheme

Analysis of the current applicants whose priority will be downgraded as a result of the proposed changes shows no bias against any one religion or belief.

Harrow's population as at 2011: 37.3% of residents identify as Christian, 25.3% as Hindu, 12.5% as Muslim and 4.4% as Jewish. 4.8% of Harrow's residents are followers of all other religions (such as Sikhs and Buddhists). 9.6% have no religion.

The feedback from the consultation did not highlight any issues related to religion and belief.

In 2014/2015 there were 1654 homeless housing applicants:

Religion and Belief

Changes to Allocations Scheme

Analysis of the current applicants whose priority will be downgraded as a result of the proposed changes shows no bias against any one sex or gender.

There were more female than male homeless housing applicants.

There were 283 accepted homeless households:

There were more female than male accepted homeless households.

The feedback from the consultation did not highlight any issues related to sex/gender.

Sex / Gender

Sex/gender	Number of applicants	%
Female	995	60.2
Male	659	39.8
Total	1654	

Sex/gender	Number of acceptances	%
Female	199	70.3
Male	84	29.7
Total	283	

Sexual Orientation	There is limited data held about this protected characteristic and there was no specific feedback related to this protected characteristic from the consultation.		<u>Changes to Allocations Scheme</u> Analysis of the current applicants whose priority will be downgraded as a result of the proposed changes shows no bias against any one sexual orientation.	
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Stage 3: Assessing Potential Disproportionate Impact

5. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

Yes	No	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
	✓		✓	✓		✓	✓	✓	✓	✓

YES - If there is a risk of disproportionate adverse impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

- **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
- It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.
- **NO** - If you have ticked 'No' to all of the above, then go to **Stage 6**
- Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 6

Stage 4: Further Consultation / Additional Evidence

6. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?

Who was consulted? What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? E.g. revising your proposals
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Stage 5: Assessing Impact				
7. What does your evidence tell you about the impact on the different Protected Characteristics? Consider whether the evidence shows potential for differential impact, if so state whether this is a positive or an adverse impact? If adverse, is it a minor or major impact?				
Protected Characteristic	Positive Impact ✓	Adverse Impact		What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 6)
		Minor ✓	Major ✓	
Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur. Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 7				
Age (including carers of young/older people)				
Disability (including carers of disabled people)				
Gender Reassignment				
Marriage and Civil				

Partnership													
Pregnancy and Maternity													
Race													
Religion or Belief													
Sex													
Sexual orientation													
8. Cumulative Impact – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?													
If yes, which Protected Characteristics could be affected and what is the potential impact?													
										Yes		No	
9. Any Other Impact – Considering what else is happening within the													
										Yes		No	

Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?

If yes, what is the potential impact and how likely is it to happen?

Stage 6 – Improvement Action Plan

List below any actions you plan to take as a result of this Impact Assessment. These should include:

- Proposals to mitigate any adverse impact identified
- Positive action to advance equality of opportunity
- Monitoring the impact of the proposals/changes once they have been implemented
- Any monitoring measures which need to be introduced to ensure effective monitoring of your proposals? How often will you do this?

Area of potential adverse impact e.g. Race, Disability	Proposal to mitigate adverse impact	How will you know this has been achieved? E.g. Performance Measure / Target	Lead Officer/Team	Target Date
Race, age, sex/gender	Monitor and compare the diversity profile of households moving out of Harrow and/or London and the diversity profile of those being housed within Harrow to identify any trends and any need for further analysis.	Performance management- data to be analysed and reported to Jon Dalton.	Housing BDT	31 December 2015 and quarterly
Race	Carry out further analysis regarding the diversity profile of larger families in Harrow's general population.	Commission BIU to complete this analysis.	Housing BDT	27 November 2015
All strands	Harrow's regeneration and development plans will provide new homes in the borough. We are also purchasing homes to increase the available housing stock for rent.	Completion of development programme	Housing Enabling	31 March 2018

Stage 7: Public Sector Equality Duty

- 10. How do your proposals meet the Public Sector Equality Duty (PSED) which requires the Council to:**
1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
 2. Advance equality of opportunity between people from different groups
 3. Foster good relations between people from different groups

The proposed changes aim to ensure that assistance is provided to those with the most acute housing need. The proposed changes also aim to manage expectations and provide clearer information. Increased clarity and fairness help to foster good relations between people from different groups.

Stage 8: Recommendation

11. Please indicate which of the following statements best describes the outcome of your EqIA (✓ tick one box only)

Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed. ✓

Outcome 2 – Minor Impact: Minor adjustments to remove / mitigate adverse impact or advance equality of opportunity have been identified by the EqIA and these are listed in the Action Plan above.

Outcome 3 – Major Impact: Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality of opportunity. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. **(Explain this in Q12 below)**

12. If your EqIA is assessed as outcome 3 explain your justification with full reasoning to continue with your proposals.

Stage 9 - Organisational sign Off

13. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?

EqIA QA Group

Signed: (Lead officer completing EqIA)

M. Green

Signed: (Chair of DETG)

David O'Neil

Date:

07/10/2015

Date:

07/10/2015

Date EqIA presented at the EqIA Quality Assurance Group (if required)	05/10/2015	Signature of DETG Chair	
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