

## TEMPLATE 2 – DRAFT Full Equality Impact Assessment (EqIA)

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this form and assessment.

What are the proposals being assessed? ( <b>Note:</b> 'proposal' includes a new policy, policy review, service review, function, strategy, project, procedure, restructure)	The draft Housing Strategy which will set out the strategic direction for all tenures of housing in Harrow, taking account of the national policy agenda as set out in the Localism Act 2011, Welfare Reform Act 2012 and local and regional priorities.
Which Directorate / Service has responsibility for this?	Community Health and Wellbeing , Housing Services
Name and job title of lead officer	Alison Pegg/Jane Fernley, Housing Partnerships and Strategy Manager
Name & contact details of the other persons involved in the EqIA:	Housing Management Team Mohammed Ilyas Carol Yarde
Date of assessment:	Updated following consultation 15 March 2013

### Stage 1: Overview

<p><b>1. What are the aims, objectives, and desired outcomes of your proposals?</b></p> <p>(Explain proposals e.g. reduction / removal of service, deletion of posts, changing criteria etc)</p>	<p>The draft Housing Strategy sets out the borough's housing objectives to:</p> <ul style="list-style-type: none"> <li>• Deliver excellent services shaped and valued by our customers</li> <li>• Increase the supply of housing, including locally affordable housing and make best use of the existing social housing stock – using our resources proactively</li> <li>• Continue to tackle homelessness by improving access to and improving standards in the private rented sector</li> <li>• Enhanced housing options, promoting mobility and choice</li> <li>• Supporting sustainable and viable communities</li> <li>• Procuring supported housing for people with additional needs</li> <li>• Improving neighbourhoods and the quality of existing homes</li> </ul> <p>These objectives reflect the changing policy environment as a result of the Localism Act 2011 and Welfare Reform Act 2012. The Housing Strategy is accompanied by a number of related policy documents that set out the detail of specific policy changes in relation to allocation of social housing, the rents levels at which new social housing is developed, the types of tenancies that will be offered to new tenants and the choices</p>
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households will have to make to ensure they have an economically realistic housing solution for their needs. The related strategies and policies are:

- Tenancy Strategy – to ensure that social housing meets the needs of Harrow residents both now and in the future and that the council and Registered Providers make efficient use of their housing stock in Harrow through utilizing the new flexible tenancy and Affordable Rent options. **Key policy change: Introduction of fixed term tenancies with average tenancy period of 5 years before review, introduction of income limits so that those who can afford to move out of social housing do so, introduction of higher rents for new social homes.**
- Tenancy Policy – sets out the tenancies the Council as landlord will offer to new tenants and the review process for flexible tenancies, if introduced. **Key policy change: Introduction of 12 month probationary tenancies followed by a fixed term tenancy with average tenancy period of 5 years before review for new Council tenants, introduction of income limits so that those who can afford to move out of Council housing do so.**
- Homelessness Strategy – sets out how we how we will work to prevent homelessness and the housing options for people who present as homeless. **Key policy change: Ability to discharge homelessness duty by providing private rented housing rather than social housing, housing options to include moves out of Harrow and London where this will best meet the long term housing needs of the household.**
- Allocation Scheme – sets out who will have priority for social housing in Harrow, including housing developed under the new Affordable Rent model, and the changes in priority from the current ones. **Key policy change: Reducing waiting time and redefining priority households to include new groups of applicants such as those in low paid employment, this means other groups will have less priority than they do now such as those who are only overcrowded by one bedroom, introducing a 5 year residency requirement and income limits (as in the Tenancy Strategy)**
- Private Sector Housing Strategy – focuses on what the Council will do to support a healthy private rented housing sector both in terms of enabling eg supporting the development of new private rented housing, provision of grants to bring empty homes back into use, assist people to remain living in their own homes and enforcement eg standards in the private rented sector.

	<ul style="list-style-type: none"> <li>HRA business Plan and Asset Management Strategy – sets out how the Council will take forward self financing proposals for the Housing Revenue Account and how it will manage and maintain its c.5, 000 Council properties over the next 30 years.</li> </ul> <p>There are related action plans for each strategy/policy which will need to be monitored and reviewed regularly to take account of changing needs, priorities and new service demands.</p>
2. What factors / forces could prevent you from achieving these aims, objectives and outcomes?	<p>The Localism Act 2011 provides freedom to Councils to make changes to the way they allocate and manage social housing, so the future direction can be decided by Members and residents working together. However, some of the outcomes eg increasing the supply of new housing, including affordable housing are dependent on wider economic factors and the actions of private sector developers which are beyond the Council's control. In addition the Welfare Reform Act changes, some of which were implemented in relation to Housing Benefit in April 2011 and the introduction of the overall benefit cap from April 2013 will impact on the ability of lower income households to make their own housing arrangements and the numbers of families approaching the Council for help with housing is increasing as evidenced by the increased numbers in Bed and Breakfast.</p>
3. Who are the customers? Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.	<ul style="list-style-type: none"> <li>All residents of Harrow who are unable to access market housing direct</li> <li>Existing social housing tenants</li> <li>All social housing providers in Harrow – mainly Registered Providers (RP's)</li> <li>Housing staff and other staff eg in Adults, Childrens services, Place Shaping</li> </ul>
4. Is the responsibility shared with another department, authority or organisation? If so: <ul style="list-style-type: none"> <li>Who are the partners?</li> <li>Who has the overall responsibility?</li> </ul>	<p>Housing Services has overall responsibility.</p> <p>However other Directorates contribute to delivery of objectives:</p> <p>Adults – assess and lead on providing services to vulnerable adults but affordable housing is key for many in terms of meeting needs in a way that cost effectively maximises individuals independence etc</p> <p>Environment and Enterprise – lead on delivery of new housing supply and provide private sector housing services such as Disabled Facilities Grants, private sector housing enforcement action, HMO registration</p> <p>Children's Services - assess and lead on providing services to children including Care leavers and affordable housing is key with regard to the continuing Corporate Parenting role. Families with children and multiple needs are also more likely to be affected by welfare reform and affordable housing will be an important factor in supporting them.</p>

4a. How are/will they be involved in this assessment?	These services are involved in various forums and through direct consultation in the development of new strategies and policies.
<b>Stage 2: Monitoring / Collecting Evidence / Data</b>	
<p>5. What information is available to assess the impact of your proposals? Include the actual data, statistics and evidence (including full references) reviewed to determine the potential impact on each equality group (protected characteristic). This can include results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys, workforce profiles, service users profiles, local and national research, evaluations etc</p> <p>(Where possible include data on the nine protected characteristics. Where you have gaps, you may need to include this as an action to address in the action plan)</p>	
Age (including carers of young/older people)	<p>Locata reports/ Reports from Harrow's in-house system – Northgate/Anite, analysis of consultation responses (summer 2011 and Jan/Feb 2013).</p> <p>29% of homeless acceptances are aged 16-24, 58% are aged 25-44, 9% aged 45-59 and whilst only 4% are aged 60 and over.</p> <p>5041 members were on the Locata register for Harrow. 63% were under the age of 45; 12% between 45-49 years; 8% between 50-54 years; 5% between 55-59 years; 3% between 60 – 65 years and 8% 65 years old and over. The breakdown by age profile is not too dissimilar to the national picture, as most households seeking social housing are families headed by a person below the mid-forties. In 2012/13 affordable housing tenancies for 38 care leavers are required and thereafter an annual need of 25 tenancies is estimated.</p> <p>The majority of respondents in all age groups thought that some people e.g. older people or people with disabilities should always be offered a lifetime tenancy. Age groups 55-64 and 65+ were unsurprisingly the most supportive age groups with 57 out of 58 people in these groups in responding with a 'yes'.</p> <p>Results from the consultation show that the majority of people from all age groups were supportive of the Council continuing to support all homeless people find a private rented home as well as encouraging people to move out of London if more affordable and suitable housing was available.</p>
Disability (including carers of disabled people)	Locata reports/ Reports from Harrow's in-house system – Northgate/Anite, analysis of consultation responses (summer 2011 and Jan/Feb 2013).

	<p>Records from Locata show that 5% of members with a live status indicated that they had a physical disability, whilst 0.7% had a Learning disability and 1.6% had mental health problems</p> <p>Only 2% of homeless acceptances are vulnerable due to physical disability.</p> <p>Housing Changes consultation: Although only a small sample of people with disabilities responded to the consultation they were overwhelmingly in favour of developing more affordable housing for rent, the majority agreed it would be fair to introduce fixed term tenancies and 100% thought that some people e.g. older people or people with disabilities should always be offered a lifetime tenancy.</p> <p>152 people responding to the Housing Changes consultation answered the question on disability. 15% said they have a disability whilst 65% did not. In response to whether the council should continue to provide services to help all homeless people find a private rented home, the majority answered positively and were in favour.</p>
Gender Reassignment	We have no information on this and no information was recorded through the Housing Changes consultation (although the monitoring questionnaire did include the question)
Marriage / Civil Partnership	We have no data recorded on this. Information was collected through the Housing changes consultation but does not suggest there would be any impact on this protected characteristic
Pregnancy and Maternity	<p>Reports from Harrow's in-house housing system, Northgate/ Anite, analysis of consultation responses.</p> <p>Since June 2010, 23 (pregnant) households were placed in B&amp;B out of total of 628; 6 (pregnant) households were housed in temporary accommodation out of a total of 234; and 15 (pregnant) households out of a total of 425 have homelessness prevented.</p> <p>78% of applicants of accepted homeless households have dependent children.</p> <p>No information was recorded through the Housing Changes consultation (although the monitoring questionnaire did include the question)</p>
Race	P1E returns relating to homeless applications, information provided through the housing application process and recorded on Northgate/Anite, analysis of consultation responses.

The table below provides a breakdown of the ethnicity of the members (live status) on Locata. For less than 10% of member's ethnicity was not known. The evidence suggests that households from minority ethnic communities are more likely to be affected by homelessness than households whose ethnicity is 'White.' In particular, 'Black' households are more likely to be affected by homelessness than their make-up as a percentage of the Borough's population.

A White – British	18.50%	
B White – Irish	1.80%	
C White – other	8.50%	
TOTAL		29%
D Mixed - White and Black Carribbean	1.90%	
E Mixed - White and Black African	1.10%	
F Mixed - White and Asian	0.80%	
G Mixed – other	1.90%	
TOTAL		5%
H Asian or Asian British - Indian	7.40%	
J Asian or Asian British - Pakistani	3.50%	
K Asian or Asian British - Bangladeshi	1.10%	
L Asian or Asian British - Other	15.50%	
TOTAL		28%
M Black or Black British - Caribbean	7.20%	
N Black or Black British - African	13.10%	
P Black or Black British - other	2.40%	
TOTAL		23%
Q Gypsy /Romany / Traveller	0.00%	
R Chinese	0.50%	0.5%
S Other	5.40%	5%
Z Not Stated	8.50%	
Not Known	0.90%	10%

Of the two-thirds of Council tenants who provided their ethnicity at application, the largest single group housed within the Council's stock is White at 55% whilst 21% are Asian and 16% are black.

	<p>Housing Changes consultation: A high proportion of respondents (32%) preferred not to state their ethnicity. The majority of respondents regardless of ethnicity were in favour of developing more affordable housing for rent, the majority agreed it would be fair to introduce fixed term tenancies and that some people e.g. older people or people with disabilities should always be offered a lifetime tenancy. A majority favoured the council encouraging people to move out of Harrow in the long term if more suitable and affordable housing is available to meet their housing need. They were also in favour of the council continuing to provide services to help all homeless people find a private rented home.</p>																		
Religion and Belief	<p>Of the 5041 members for Harrow on the Locata register, information on religion is known for just 22% (1148). The table below provides a breakdown of the religious groups for the 1148 on whom information is held:</p> <table> <tr> <td>Buddhist</td><td>0.87%</td></tr> <tr> <td>Christian</td><td>40.42%</td></tr> <tr> <td>Hindu</td><td>10.45%</td></tr> <tr> <td>Jewish</td><td>0.52%</td></tr> <tr> <td>Muslim</td><td>25.17%</td></tr> <tr> <td>no religion</td><td>13.24%</td></tr> <tr> <td>other religions</td><td>2.09%</td></tr> <tr> <td>not stated</td><td>6.97%</td></tr> <tr> <td>Sikh</td><td>0.26%</td></tr> </table> <p>Analysis of the Housing Changes consultation shows that those who responded were: 26% Christian, 7% were Hindu; 5% Muslim and 13% no religion. 42% of respondents did not answer the question.</p> <p>The majority of respondents regardless of religion were in favour of developing more affordable housing for rent, the majority agreed it would be fair to introduce fixed term tenancies and that some people e.g. older people or people with disabilities should always be offered a lifetime tenancy.</p> <p>There is no evidence to suggest that the strategy will have an adverse impact on anyone due to religion or belief, and regardless of religion or belief the majority of respondents were in favour of the council continuing to provide services to help all homeless people find a private rented home. They were also in favour of the council encouraging people to move out of Harrow in the long term if more suitable and</p>	Buddhist	0.87%	Christian	40.42%	Hindu	10.45%	Jewish	0.52%	Muslim	25.17%	no religion	13.24%	other religions	2.09%	not stated	6.97%	Sikh	0.26%
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	affordable housing is available to meeting their housing need.
Sex / Gender	<p>A report from Harrow's in-house housing system, Northgate/ Anite.</p> <p>Information held on the Locata register (live) shows that 60% were from households where the head was a female, either as a single person or as the head of the family.</p> <p>53% of homeless acceptances female lone parents with dependent children compared to 7% of male lone parents with dependent children.</p> <p>Housing Changes consultation: The majority of respondents regardless of sex were in favour of developing more affordable housing for rent, the majority agreed it would be fair to introduce fixed term tenancies and that some people e.g. older people or people with disabilities should always be offered a lifetime tenancy. Sex/Gender was disclosed by 178 respondents to the consultation. 86 described their sex as female; 55 male; 14 did not want to disclose. More than half of both males and females were also in favour of the council encouraging people to move out of Harrow in the long term if more suitable and affordable housing is available to meeting their housing need. More than 70% of males and females were in favour of the council continuing to provide services to help all homeless people find a private rented home.</p>
Sexual Orientation	<p>The sexual orientation of 23% of members with a live status on Locata is known or recorded. Of these, 86% are heterosexual; 12% have chosen not to state, and Gay man, Lesbian &amp; Bisexual are 1% each.</p> <p>Housing Changes consultation: 160 people answered the question on sexual orientation, whilst 51 did not disclose their sexual orientation, 89 gave their orientation as heterosexual. Bisexual was answered by 9 respondents, and a further 1 as gay woman/lesbian.</p> <p>The majority of respondents regardless of sexual orientation were in favour of developing more affordable housing for rent, the majority agreed it would be fair to introduce fixed term tenancies and that some people e.g. older people or people with disabilities should always be offered a lifetime tenancy.</p> <p>More than half of those responding to whether the council should continue to provide services to help all homeless people find a private rented home as well as the council encouraging people to move out of Harrow in the long term if they will find more suitable and affordable housing were in favour irrespective of their sexual orientation.</p>



<p><b>6. Is there any other (local, regional, national research, reports, media) data sources that can inform this assessment?</b></p> <p>Include this data (facts, figures, evidence, key findings) in this section.</p>		<p>National and regional data for example on age and health can help to inform potential future trends. Again this is referred to in our Evidence Base which is attached.</p>		
<p><b>7. Have you undertaken any consultation on your proposals? (this may include consultation with staff, members, unions, community / voluntary groups, stakeholders, residents and service users)</b></p>		Yes	✓	No
<p><b>NOTE:</b> If you have not undertaken any consultation as yet, you should consider whether you need to. For example, if you have insufficient data/information for any of the protected characteristics and you are <b>unable</b> to assess the potential impact, you may want to consult with them on your proposals as how they will affect them. Any proposed consultation needs to be <b>completed before</b> progressing with the rest of the EqIA.  <b>Guidance on consultation/community involvement toolkit can be accessed via the link below</b>  <a href="http://harrowhub/info/200195/consultation/169/community_involvement_toolkit">http://harrowhub/info/200195/consultation/169/community_involvement_toolkit</a></p>				
Who was consulted?	What consultation methods were used?	What do the results show about the impact on different equality groups (protected characteristics)?	<p>What action are you going to take as a result of the consultation?          This may include revising your proposals, steps to mitigate any adverse impact.  <i>(Also Include these in the Improvement Action Plan at Stage 5)</i></p>	
Harrow residents	Roadshows held throughout the borough including town centre locations, housing estates and attendances at TRA meetings – in total 30 events were held, Drop in sessions in Access Harrow, web based questionnaire promoted from August – October 2011	Outcomes from the consultation analysed by the protected characteristics are presented in Appendix 2 of the December 2011 Cabinet report. The main results relating to the equality groups is that when developing policies relating to new flexible tenancies that we continue providing older people and people with disabilities a home for life,	The Final Tenancy Strategy has taken into account all the impacts raised on the different equality groups.	

		that when deciding on how we review tenancies at the end of the fixed term that we ensure people are treated fairly and individual circumstances are taken into account, that if offering people housing options outside Harrow that we consider personal circumstances including family and cultural needs, that we continue to provide services to help all homeless people including the single homeless, that we should prioritise people in low paid employment for social housing whilst also meeting the needs of homeless households and people with medical priority	
Attendance at voluntary group meetings such as Asperger forum, Northolt Road Community Group meeting	Presentation, Q&A and completion of questionnaires	See above	See above
Voluntary sector consultation	Event held on 15 November 2011 and 10 May 2012. Mixture of presentations and workshops	Attendees at the forum on 10.05.12 were supportive of the options presented with regards to discharging homelessness duty into the private rented sector as well as outside of the borough on the basis that households were not forced to move outside of the borough if they did not wish to.	This was taken into account in drafting the formal consultation drafts of the Housing Strategy , Homelessness Strategy and Housing Allocation Scheme
Formal consultation on Tenancy Strategy took place from 10	Council web site hosted questionnaire, attendance at key	That Care Leavers should be treated as other vulnerable adults	Amendment made to strategy take into account the housing needs of

May – – 5 July and involved all of the above groups as well as staff, Registered Providers, the London Mayor/GLA	meetings including voluntary sector consultation 10 May, attendance at other meetings such as TLRCF	and given more security.	Care Leavers
Tenants in the private rented sector	Forum held on 28.6.12. Mixture of presentations and discussions and questions and answers with approximately 15 tenants living in private rented accommodation.	Feedback via the questionnaires has been very low, but where received the option proposed to discharge duty into the private rented sector was supported and no comments were made about the impact on different equality groups.	This was taken into account in drafting the formal consultation drafts of the Homelessness Strategy and Private Sector Housing Strategy.
Formal consultation from 2 January 2013 to 27 <sup>th</sup> February 2013 on the Housing Strategy, Homelessness Strategy, Private Sector Housing Strategy and Housing Allocation scheme	On line questionnaire Various meetings held including voluntary sector forum 6/2/13, various tenants and resident association meetings, private sector tenants forum, meeting with housing associations, survey to private landlords	<p>The Council should be collating evidence and monitoring the impact on low income households of rising housing costs</p> <p>That the Homelessness EQIA did not adequately recognise the impact that moves out of London could have on members of particular black and minority ethnic groups that may want to live in the same area.</p> <p>Rough sleepers may be adversely impacted by the 5 year continuous residence requirement.</p>	<p>The Council has limited data on low income households struggling due to the cost of housing, unless in receipt of Housing Benefit and identified as facing a loss in Housing Benefit as a result of welfare reform. The Housing Strategy Action Plan has been amended to include a monitoring action with regard to this issue.</p> <p>The Homelessness Strategy EQIA has been revised to recognise the impact may be differential.</p> <p>The Allocation scheme has been revised so that rough sleepers will not be disqualified from the Housing Register if they have had a previous 5</p>

		<p>There is no fair way to assess priority for housing on the grounds of community work.</p> <p>Adopted children have a high need to have settled accommodation which can only be provided through an offer of social housing.</p> <p>Potential adverse impact of excluding adult children from the calculation of overcrowding and the number of bedrooms needed by a family.</p>	<p>year local connection to Harrow.</p> <p>This proposal has been deleted from the Allocation scheme. We will collect data on the issue so that we can review whether to include this as a priority in the future.</p> <p>Accept that adopted children have a need for settled accommodation but not that this can only be public rented housing.</p> <p>The Council is not proposing to remove adult children from the household. It is up to each family how it responds by balancing economic and overcrowding considerations. The Allocation EQIA has been updated to respond to this issue.</p>
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### Stage 3: Assessing Impact and Analysis

**8.** What does your information tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?

Protected Characteristic	Positive	Adverse	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.	What measures can you take to eliminate or reduce the adverse impact(s)? E.g. consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 5)
Age (including carers of young/older people)	√	√	The intention to increase the supply of affordable housing will have a positive impact on young people who are more likely to be on the Housing Register.	The Tenancy Strategy offers options of either lifetime tenancies or automatic renewal of fixed term tenancies to older people in sheltered housing or 1 bed accommodation and Care Leavers. Support

			<p>Younger people are more likely to be affected by the key policy changes highlighted above as introduction of flexible tenancies will only affect new tenants rather than existing tenants. However, the purpose of some of the changes is to use the existing social housing more effectively so this would benefit those people currently waiting for housing or future applicants.</p> <p>Some young people have a priority need for housing under the homelessness legislation and are more likely to be affected by any change in the way that the main homelessness duty can be fully discharged. Combined with the change in Housing Benefit which restricts young people generally in the private rented sector to a room in a shared house, the private rented sector may not be suitable accommodation.</p>	<p>and Advocacy services are also recommended for vulnerable people who facing a Tenancy Review. Once adopted the outcomes of Tenancy reviews will be monitored.</p> <p>The Housing Strategy and other strategies were formally consulted on from 2 January 2013 – 27 February 2013. No additional impacts were identified. Once adopted the policies will be subject to rigorous monitoring for which a framework is being developed</p>
Disability (including carers of disabled people)	√	√	<p>Disabled people, including those with carers, are more likely to be unable to access private sector housing and are therefore more likely to seek assistance from the Council. The intention to increase the supply of affordable housing will have a positive impact on those with disabilities who are more likely to be on the Housing Register .We already have a number of policies in place to mitigate this impact eg that 10% of all new social housing should be built to full wheelchair standard and these will continue.</p> <p>Disabled applicants already have priority for social housing and this will continue. People who are disabled or who are mentally ill are</p>	<p>Tenancy Strategy offers households that include a member with a disability automatic renewal of fixed term tenancies where circumstances are unchanged.</p> <p>The draft Housing Strategy and other strategies were formally consulted on from 2 January 2013 – 27 February 2013. No additional impacts were identified. Once adopted the policies will be subject to rigorous monitoring for which a framework is being developed.</p>

			considered to have a priority need for housing under the homelessness legislation and are therefore more likely to be affected by any change in the way that the main homelessness duty can be fully discharged.	
Gender Reassignment			There is limited data with regard to this group and nothing to suggest there will be any specific impact on this group. Priority for social housing already includes medical condition for which people with gender reassignment may fall within. There is no proposal to change this priority so there should be no impact on this group that is any different to any other group.	The draft Housing Strategy and other strategies were formally consulted on from 2 January 2013 – 27 February 2013. No additional impacts were identified. Once adopted the policies will be subject to rigorous monitoring for which a framework is being developed.
Marriage and Civil Partnership			There is limited data with regard to this group and nothing to suggest there will be any specific impact on this group. We have no reason to suppose that the proposed policy changes will have an impact either positively or adversely on this group. Current policies take into account family circumstances whether marriage, civil partnership or co-habitation and this is intended to continue.	The draft Housing Strategy and other strategies were formally consulted on from 2 January 2013 – 27 February 2013. No additional impacts were identified. Once adopted the policies will be subject to rigorous monitoring for which a framework is being developed.
Pregnancy and Maternity	✓	✓	<p>The majority of homeless acceptances are households with dependent children or which include a pregnant woman and are therefore more likely to be affected by any change in the way that the main homelessness duty can be fully discharged. However, an offer of private rented accommodation may still be suitable to meet the households housing needs.</p> <p>Current policies take into account family circumstances including pregnancy and maternity which is accorded priority status for social</p>	<p>The review process in the Tenancy Strategy includes consideration of children at key stages of education as a factor when considering whether to renew tenancies.</p> <p>The draft Housing Strategy and other strategies were formally consulted on from 2 January 2013 – 27 February 2013. We will explore ways of monitoring low income households struggling with the costs of housing. Once adopted the policies will be subject to rigorous monitoring for which a framework is being developed.</p>

			housing. Therefore policies which increase social housing opportunities may have a positive impact on this group. The intention to increase the supply of affordable housing will have a positive impact on households with dependent children.	
Race	√	√	<p>The intention to increase the supply of affordable housing and other proposed policy changes may have a positive impact by creating better access to social housing.</p> <p>BAME households seeking affordable housing tend to be larger and thus require larger homes, of which there is a shortage in Harrow.</p> <p>Households from certain BAME groups are more likely to be accepted as homeless (based on evidence of known BAME background). People from BAME groups are therefore more likely to be affected by changes in the way that the homelessness is discharged.</p>	<p>The Tenancy Strategy proposes that cultural needs/family networks should be taken into account in the review process when considering the suitability of alternative accommodation.</p> <p>The draft Housing Strategy and other strategies. were formally consulted on from 2 January 2013 – 27 February 2013. The Homelessness Strategy EQIA has been revised to recognise the impact may be differential and how we will monitor the outcomes to inform reviews of the policy.</p>
Religion or Belief			<p>There is limited data with regard to this group. We have no reason to suppose that the proposed policy changes will have an impact either positively or adversely on this group provided that any policies eg relating to review of tenancies, if fixed term tenancies are introduced, take into account cultural needs.</p>	<p>The Tenancy Strategy proposes that cultural needs/family networks should be taken into account in the review process when considering the suitability of alternative accommodation.</p> <p>The draft Housing Strategy and other strategies. were formally consulted on from 2 January 2013 – 27 February 2013. No additional impacts were identified. Once adopted the policies will be subject to rigorous monitoring for which a framework is being developed.</p>
Sex	√	√	<p>Current policies take into account family circumstances regardless of sex. Lone parents, of whom the majority are women, are more likely to</p>	<p>The draft Housing Strategy and other strategies. were formally consulted on from 2 January 2013 – 27 February 2013. No additional impacts were</p>

			<p>be a priority for social housing and therefore the impact of policies relating to changing priorities or different housing options have been considered to assess potential adverse impact. Eg giving priority to families in low paid employment may favour two parent families over lone parents.</p> <p>The draft Housing Strategy is intended to have a positive impact by making better use of the existing social housing stock and ensuring the development of new affordable housing</p>	<p>identified. Once adopted the policies will be subject to rigorous monitoring for which a framework is being developed.</p>
Sexual Orientation			<p>There is limited data with regard to this group. We have no reason to suppose that the proposed policy changes will have an impact either positively or adversely on this group.</p>	<p>The draft Housing Strategy and other strategies. were formally consulted on from 2 January 2013 – 27 February 2013. No additional impacts were identified. Once adopted the policies will be subject to rigorous monitoring for which a framework is being developed.</p>
Other (please state) Socio-economic	√	√	<p>The Council only assists people who are unable to afford market housing and therefore any of the policies under consideration may either have a positive impact eg by increasing the supply of affordable housing or alternative housing options or an adverse impact if the affordable housing is not locally affordable.</p> <p>Low income households struggling due to the cost of housing may be particularly adversely impacted.</p>	<p>The Tenancy Strategy advises RPs on the rent levels for new affordable housing and we have calculated local affordability by bed size and recommended maximum guideline rents to be charged especially for larger (4 bed plus homes) in order to ensure they will be affordable to families in receipt of benefits.</p> <p>The Council has limited data on low income households struggling due to the cost of housing unless in receipt of HB and identified as facing a loss in HB as a result of welfare reform. A monitoring action has been included in the Action Plan</p>



<p><b>9. Cumulative impact</b> – Are you aware of any cumulative impact? For example, when conducting a major review of services. This would mean ensuring that you have sufficient relevant information to understand the cumulative effect of all of the decisions.</p> <p><b>Example:</b></p> <p>A local authority is making changes to four different policies. These are funding and delivering social care, day care, and respite for carers and community transport. Small changes in each of these policies may disadvantage disabled people, but the cumulative effect of changes to these areas could have a significant effect on disabled people’s participation in public life. The actual and potential effect on equality of all these proposals, and appropriate mitigating measures, will need to be considered to ensure that inequalities between different equality groups, particularly in this instance for disabled people, have been identified and do not continue or widen. This may include making a decision to spread the effects of the policy elsewhere to lessen the concentration in any one area.</p>		<p>This EQIA has been undertaken taking into account all the potential policy changes and wider welfare reforms as they all impact on each other. We have considered the cumulative impact of all the proposed changes in arriving at the policy proposals in the strategies.</p>	
<p><b>10.</b> How do your proposals contribute towards the requirements of the Public Sector Equality Duty (PSED), which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups.</p> <p>(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)</p>			
<p>Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010</p>	<p>Advance equality of opportunity between people from different groups</p>	<p>Foster good relations between people from different groups</p>	<p>Are there any actions you can take to meet the PSED requirements? <i>(List these here and include them in the Improvement Action Plan at Stage 5)</i></p>
<p>The development of the Housing Changes Review policies through wide consultation with residents alongside a comprehensive evidence base will ensure that any impacts</p>	<p>Consultation has been undertaken in many different ways to enable participation in particular from seldom heard groups such as young people, people from BAME communities, and</p>	<p>The purpose of the Housing Changes review is to ensure that the impacts on making the different policy changes are considered across the board, that development of policies</p>	<ul style="list-style-type: none"><li>Publicise evidence and reasons for policy changes in a wide number of ways</li><li>Ensure a variety of community and voluntary groups are</li></ul>

relating to the Equality Act 2010 are mitigated.	people with disabilities.	includes input from a wide range of Harrow residents, that the reasons and rationale for making any changes are widely publicised in formats that are easily accessible to all, that publicising the evidence and reasons for policy changes also assists with dispelling myths that some groups of the community are more likely to get social housing than others.	involved in developing policies.
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**11.** Is there any evidence or concern that your proposals may result in a protected group being disadvantaged (please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act)?

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

If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)

If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.

If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. (select outcome 4)  
If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. (select outcome 4)

#### Stage 4: Decision

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

<b>Outcome 1</b> – No change required: when the EqIA has not identified any potential for unlawful conduct or adverse impact and all opportunities to enhance equality are being addressed.	
<b>Outcome 2</b> – Minor adjustments to remove / mitigate adverse impact or enhance equality have been identified by the EqIA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 5</i>	✓
<b>Outcome 3</b> – Continue with proposals despite having identified potential for adverse impact or missed opportunities to enhance	

equality. In this case, the justification needs to be included in the EqlA 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. <b>(explain this in 12a below)</b>	
<b>Outcome 4</b> – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	
<b>12a.</b> If your EqlA is assessed as <b>outcome 3 or have ticked 'yes' in Q11</b> , explain your justification with full reasoning to continue with your proposals.	

<b>Stage 5: Making Adjustments (Improvement Action Plan)</b>					
<b>13.</b> List below any actions you plan to take as a result of this impact assessment. This should include any actions identified throughout the EqlA.					
Area of potential adverse impact e.g. Race, Disability	Action proposed	Desired Outcome	Target Date	Lead Officer	Progress
Age, Disability, Pregnancy and Maternity, Race, Sex, Socio Economic Inequality	Monitor individual strategy action plans		By July 2013	Alison Pegg/Jane Fernley	
Age, Disability, Pregnancy and Maternity, Race, Sex, Socio Economic Inequality	Agree monitoring framework and review each strategy annually or as appropriate	Alison Pegg/Jane Fernley	By July 2013	Alison Pegg/Jane Fernley	

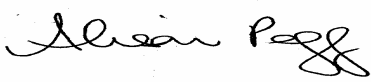
<b>Stage 6 - Monitoring</b> The full impact of the decision may only be known after the proposals have been implemented, it is therefore important to ensure effective monitoring measures are in place to assess the impact.	
<b>14.</b> How will you monitor the impact of the proposals once they have been	Each policy/strategy has an accompanying action plan which will

implemented? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 5)</i>	include equality monitoring and will be reviewed at least annually		
<b>15.</b> Do you currently monitor this function / service? Do you know who your service users are?	Yes	√	No
<b>16.</b> What monitoring measures need to be introduced to ensure effective monitoring of your proposals? <i>(Also Include in Improvement Action Plan at Stage 5)</i>	Monitoring of homeless acceptances, discharge of homelessness duty by equality group and tenure discharged to, rent levels and local affordability, tenancies offered by equality group, proportion of flexible tenancies renewed , reasons for not renewing flexible tenancies (if introduced),		
<b>17.</b> How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 5)</i>	At the present time we report performance quarterly to Improvement board and to our Residents forum. Performance information is also published in our Homing In magazine which is sent to all tenants and leaseholders. We would also publish performance against agreed action plans on the web.		
<b>18.</b> Have you received any complaints or compliments about the policy, service, function, project or proposals being assessed? If so, provide details.	We have received positive feedback from residents involved in the Housing Changes Review on both the promotion of the potential changes and impacts on local people and our efforts to involve residents in shaping the strategies and policies.		

### Stage 7 – Reporting outcomes

The completed EqlA must be attached to all committee reports and a summary of the key findings included in the relevant section within them.

EqlA's will also be published on the Council's website and made available to members of the public on request.

<b>19. Summary of the assessment</b>  <b>NOTE:</b> This section can also be used in your reports, however you must ensure the full EqIA is available as a background paper for the decision makers (Cabinet, Overview and Scrutiny, CSB etc)  ➤ What are the key impacts – both adverse and positive? ➤ Are there any particular groups affected more than others? ➤ Do you suggest proceeding with your proposals although an adverse impact has been identified? If yes, what are your justifications for this? ➤ What course of action are you advising as a result of this EqIA?		The findings of the Council's full EQIA indicate there may be adverse impacts on certain protected characteristics particularly in respect of age, disability, sex, pregnancy and maternity and race but that overall the Housing Strategy will mitigate against these through its key objective to increase the supply of affordable housing in Harrow and make best use of its existing stock. The other strategies all include mitigation proposals.	
<b>20. How will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc</b>	Council website, intranet, sent to various partnership meetings including Registered Providers forums, Single homeless forum, Harrow federation of tenants and residents associations (HFTRA) etc.		
<b>Stage 8 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)</b>			
<b>The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.</b>			
<b>21. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?</b>	Community, Health and Wellbeing Equalities Task Group		
Signed: (Lead officer completing EqIA)		Signed: (Chair of DETG)	
Date:	15 March 2013	Date:	