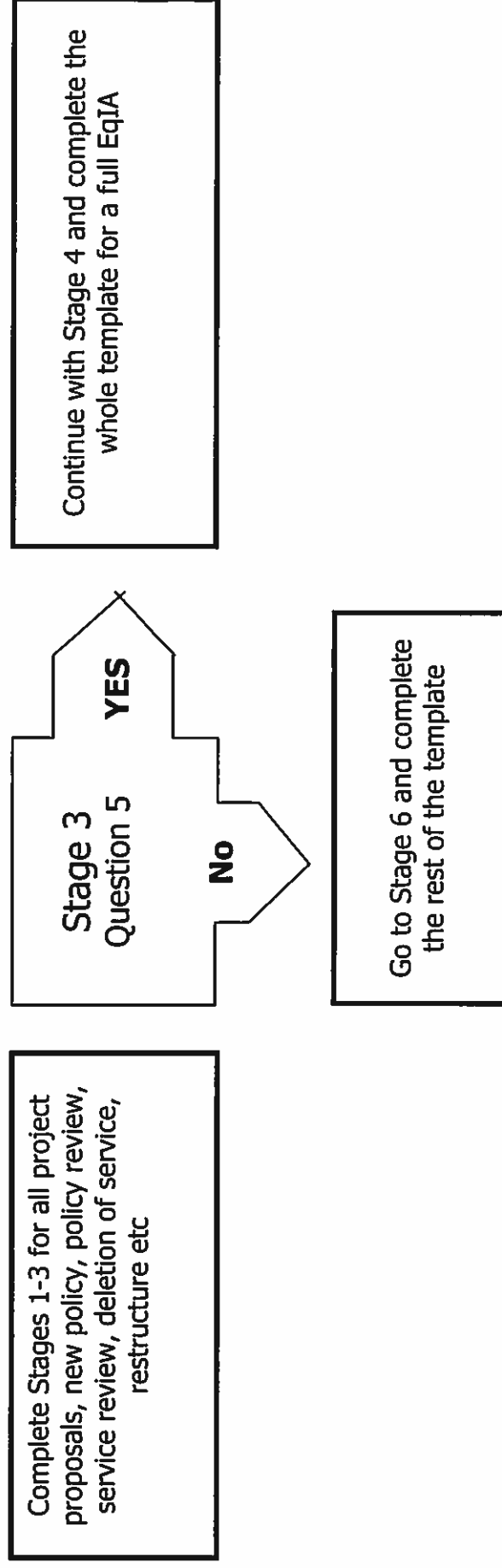


Equality Impact Assessment Template

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.
- Legal will NOT accept any report 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)	Resident Steering Group
Date decision to be taken:		Various			
Value of savings to be made (if applicable):		N/A			
Title of Project:		Grange Farm Estate Regeneration			
Directorate / Service responsible:		Community/Housing			
Name and job title of Lead Officer:		Scott Causer – Project Manager - Research & New Initiatives			
Name & contact details of the other persons involved in the assessment:		Alison Pegg – Housing Partnerships and Strategy Manager Paul Mullins – Interim Senior Project Manager			
Date of assessment (including review dates):		Assessment carried out 14 th April 2015 and information transferred to new EQIA template 12 May 2016			
Stage 1: Overview					
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)	Regenerate the Grange Farm estate which currently comprises 260 council flats. This will involve the demolition of the existing non-traditionally constructed (Resiform) flats which are now beyond economic repair and hard to heat, which make up the majority of the homes on the estate. Around 545 new homes will be built to replace the existing properties. Existing tenants, leaseholders and freeholders will need to move from their current homes. Existing tenants will be entitled to be rehoused either in new homes on the estate or be offered another council tenancy. Leaseholders and freeholders will be required to sell their homes back to the council and either move and buy elsewhere or purchase a new home on the estate. The additional homes built will be sold to cross subsidise the cost of regeneration. The regeneration process will provide opportunities to offer construction training apprenticeships as well as other training and development opportunities to residents on the estate and within the wider community.				

2. Who are the main groups / 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	
3. Is the responsibility shared with another directorate, authority or organisation? If so: • Who are the partners? • Who has the overall responsibility? • How have they been involved in the assessment?	Sexual Orientation		Other			
	The overall responsibility for the project lies with Housing Services, assisted by colleagues in Planning, Legal Services and a team of consultants including Red Loft (Client Advisors), an Architect and Employers Agent. Estate residents and other stakeholders such as adjacent land owners are key partners in the project. A cross directorate Officer Project Team was set up in August 2014. The team meets monthly and reports to the Housing Regeneration Project Board and through that to the Corporate Regeneration Board. There is also a monthly Resident Steering Group. All of these Groups have been involved in this EqIA assessment.					

Stage 2: Evidence & Data Analysis

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.	
(Where you have gaps (data is not available/being collated for any Protected Characteristic), you should include this as an action to address in your Improvement Action Plan at Stage 6)	

Protected Characteristic	Evidence	Analysis & Impact
Age (including carers of young/older people)	A significant proportion of households (22%) have a Head of Household aged 65 or over. At 16% Grange Farm has the same proportion of overall residents aged 65 or over currently resident in the properties which is in line with the Borough and Ward (Harrow On The Hill) averages in which it is situated. 18.9% of all residents	The regeneration proposals will result in the replacement of sub-standard hard to heat council properties with brand new homes built to modern standards including high levels of energy efficiency and accessibility. There will be a better mix of affordable rented homes than

	at Grange Farm are under the age of 16. This is slightly lower than the Borough and Ward average which stands at 20%. 66% of residents are of working age (16-64) which is in line with Borough and Ward averages. This age group make up the highest proportion on the estate.	currently exist including 1, 2, 3 and 4 bedrooms homes to meet a wide range of needs. All existing secure residents of the estate will be offered the option of a new home to meet their current housing needs or if preferred a move to another suitable home elsewhere in the borough. Some tenants may need to move temporarily during the building works and assistance will be provided for these and permanent moves. Additional assistance will be provided to vulnerable residents including older people, people with disabilities and any other need which identifies additional assistance is required. Residents will be entitled to statutory Home Loss and Disturbance payments so they are not out of pocket for any moves they have to undertake. Leaseholders will also be entitled to Home Loss and Disturbance payments and resident leaseholders who are unable to afford a move to suitable accommodation in the local area will be offered an equity share option.
Disability (including carers of disabled people)	Households where the head has a disability represent a significant proportion of overall households (20%) on the estate and 37% of tenants have a person resident in their property who have declared they have a disability. This is considerably higher than the borough and national averages. Census data indicates that 14.6% of residents in Harrow report a limiting long-term illness or disability which limits their day-to-day activities. This is below the national average of 17.9%.	As above. 10% of the new homes will be built to meet the council's and London Plan requirements for fully accessible wheelchair housing with the remainder to Lifetimes Homes standards as set out in Building Regulations. Existing tenants will be offered a new home based on their current housing need including need for adapted or wheelchair housing. Adaptations will be provided to meet individual household requirements as assessed by an OT.

	Out of all Grange Farm residents on the estate: • 37% declared a disability in their household: • 28% have a disability which limits their mobility. • 14% have specially adapted homes • 10% have a carer; and • 1.3% have a mobility scooter • 2.2% have a hearing impairment • 3.1% have learning difficulties • 3.1% have a visual impairment • 7.4% have ill health Of those households that indicated they had a disability, only 56 % declared what their disability actually was. The figures we have indicate that there are those with more than one disability and in some cases multiple disabilities.	Some tenants may need to move temporarily during the building works and assistance will be provided for these and permanent moves. Additional assistance will be provided to vulnerable residents including older people, people with disabilities and any other need which identifies additional assistance is required. Residents will be entitled to statutory Home Loss and Disturbance payments so they are not out of pocket for any moves they have to undertake.
Gender Reassignment	We have no current data which identifies anyone on the estate with this characteristic.	Existing tenants will be offered a new home based on their housing need. There is no evidence to indicate any of our proposals will present an issue to this group of people with regards to this project.
Marriage / Civil Partnership	There is a high level of non-disclosure on this characteristic and as such we have no current data which identifies anyone on the estate with this	As above.

	characteristic.																																																		
Pregnancy and Maternity	We have no current data which identifies anyone on the estate with this characteristic. However, there is no evidence to indicate any of our proposals will present an issue to this group of people with regards to this project	As above. The housing need assessment will take account of any need through pregnancy/maternity in accordance with the councils agreed Allocation Policy.																																																	
Race	Harrow has one of the most ethnically diverse populations nationally. In 2011, 69 per cent of Harrow's residents were from minority ethnic groups, where ethnic minority is defined as all people who are non-White British. Nationally, Harrow has the fourth highest proportion of residents from minority ethnic groups (ONS 2011 Census). The estate is roughly in line with borough averages and reflects this. The ethnic breakdown of Grange Farm Estate is as follows: <table><thead><tr><th>Ethnicity</th><th>Count</th><th>Percentage (%)</th></tr></thead><tbody><tr><td>Afghan</td><td>7</td><td></td></tr><tr><td>African</td><td>13</td><td></td></tr><tr><td>Albanian</td><td>4</td><td></td></tr><tr><td>Arab</td><td>1</td><td></td></tr><tr><td>Bangladeshi</td><td>3</td><td></td></tr><tr><td>Caribbean</td><td>15</td><td></td></tr><tr><td>Chinese</td><td>2</td><td></td></tr><tr><td>English</td><td>63</td><td></td></tr><tr><td>Indian</td><td>19</td><td></td></tr><tr><td>Iranian</td><td>1</td><td></td></tr><tr><td>Irish</td><td>9</td><td></td></tr><tr><td>Other Asian</td><td>5</td><td></td></tr><tr><td>Other Black</td><td>5</td><td></td></tr><tr><td>Other Ethnic</td><td>1</td><td></td></tr><tr><td>Other Mixed</td><td>1</td><td></td></tr></tbody></table>	Ethnicity	Count	Percentage (%)	Afghan	7		African	13		Albanian	4		Arab	1		Bangladeshi	3		Caribbean	15		Chinese	2		English	63		Indian	19		Iranian	1		Irish	9		Other Asian	5		Other Black	5		Other Ethnic	1		Other Mixed	1		Existing tenants will be offered a new home based on their housing need. There is no evidence to indicate any of our proposals will present an issue to this group of people with regards to this project.	
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Afghan	7																																																		
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	<table><tr><td>Other White</td><td>5</td><td>2.6</td></tr><tr><td>Pakistani</td><td>4</td><td>2.1</td></tr><tr><td>Romanian</td><td>1</td><td>0.5</td></tr><tr><td>Scottish</td><td>1</td><td>0.5</td></tr><tr><td>Somali</td><td>22</td><td>11.5</td></tr><tr><td>Sri Lankan</td><td>7</td><td>3.6</td></tr><tr><td>White and Black African</td><td>2</td><td>1.0</td></tr><tr><td>White and Black Caribbean</td><td>1</td><td>0.5</td></tr><tr><td>TOTAL</td><td>192</td><td>100</td></tr></table>	Other White	5	2.6	Pakistani	4	2.1	Romanian	1	0.5	Scottish	1	0.5	Somali	22	11.5	Sri Lankan	7	3.6	White and Black African	2	1.0	White and Black Caribbean	1	0.5	TOTAL	192	100
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White and Black African	2	1.0																										
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TOTAL	192	100																										
	At the time of preparing this EqIA in April 2015, the survey had been completed with 194 LB Harrow households on the Grange Farm Estate.																											
Religion and Belief	Harrow is Britain's most religiously diverse community and enjoys the country's highest density of Gujarati Hindus and Sri Lankan Tamils, alongside significant Muslim, Jewish and Christian communities. The Greater London Authority (GLA) Diversity Indices rank Harrow seventh highest nationally for ethnic diversity and second for religious diversity. Census data: The 2011 Census revealed that religious affiliation is very high in Harrow; at 9.6%, the borough has the 2nd lowest number of residents who stated that they have no religion. This compares to 24.7% nationally (Office for National Statistics, 2011). The religious breakdown of Grange Farm Estate is as follows: religious breakdown of Grange Farm Estate is as follows: As above																											

		Religion	Count	Percentage (%)	Percentage (%)
		Agnostic	10	3.6	
		Christian	4	1.4	
		Hindu	13	4.7	
		Jain	1	0.4	
		Judaism	1	0.4	
		Islam	30	10.9	
		Sikh	2	0.7	
		Other	3	1.1	
		Prefer Not To Say	5	1.8	
		Blank	207	75	
		TOTAL	276	100%	
Sex / Gender		Census data: In 2011, 49.4% of Harrow residents were male and 50.6% are female. This is very similar to the national profile, but the number of males in Harrow has slightly increased since 2001 (Office for National Statistics, 2001 and 2011). Females represent a 57% proportion of people resident on the estate whilst males represent 43%. This contrasts starkly with the borough-wide and national figures. In 2011, 49.4% of Harrow residents were male and 50.6% are female. This is very similar to the national profile. In direct comparison with ONS			As above

	Statistics Females are over represented on Grange Farm Estate.	
Sexual Orientation	There is a high level of non-disclosure on this characteristic and as such we have no current data which identifies anyone on the estate with the designations related to this characteristic. However, there is no evidence to indicate any of our proposals will present an issue to anyone relating to their sexual orientation with regards to this project.	As above

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?

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

YES - If there is a risk of disproportionate adverse Impact on any **ONE** of the Protected Characteristics, complete a FULL EqIA.

- **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
Tenants: 121 Housing Needs survey with existing residents on the Grange Farm estate Monthly meetings have taken place since July 2015 and other consultation events Newsletters Phone Calls Emails 121 meetings	Need to ensure suitable accommodation is provided to meet the needs of existing households with disabilities. Need to make sure there is additional support in the moving process for vulnerable households Flat layouts are suitable for families from different minority ethnic backgrounds	Proposals include requirements for 10% wheelchair housing Landscaping proposals ensure all amenity areas are accessible to and usable by people with a range of disabilities Decant process provides "hand holding" resource to vulnerable households Flat layouts allow for separate kitchens and living/dining rooms.
Leaseholders and Freeholders: 121 Housing Needs survey with existing residents on the Grange Farm estate Monthly meetings have taken place since July 2015 and other consultation events Newsletters Phone Calls Emails 121 meetings	Some resident leaseholders may not be able to afford to move and buy suitable alternative accommodation in the local area	Equity share offer for resident leaseholders – the council will provide the difference between the value of their existing home and the new one (up to a certain value) as an equity loan.

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 ✓	
Age (including carers of young/older people)	✓			There will be a better mix of affordable rented homes than currently exist including 1, 2, 3 and 4 bedrooms homes to meet a wide range of needs. All existing secure residents of the estate will be offered the option of a new home to meet their current housing needs or if preferred a move to another suitable home elsewhere in the borough.
Disability (including carers of disabled people)	✓			Existing tenants will be offered a new purpose built home to meet their need for adapted or wheelchair housing. Adaptations will be provided to meet individual household requirements as assessed by an OT. None of the existing homes on the estate meet current requirements for Lifetime or wheelchair standard homes. We will provide additional assistance to vulnerable households to facilitate the move into

					a new home.		
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?		Yes	No	✓
If yes, which Protected Characteristics could be affected and what is the potential impact?				
9. Any Other Impact – Considering what else is happening within the 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?		Yes	No	✓
These regeneration proposals are all positive by providing new high quality homes for affordable rent to households who cannot afford to rent or buy on the open market.				
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
Disability & Age	Provision a mix of bed size of affordable rented homes including at least 10% to full wheelchair standard. We will provide removal and support service for vulnerable residents. We will involve these residents in the	Target mix achieved for planning application and consulted on with Resident Steering Group Decant policy sets outs removal and support service standards which are monitored by Resident	Paul Mullins	Ongoing

	design/build process to ensure their needs are met.	Steering Group Evidence of consultation events, feedback received and acted upon		
Language	There are some parts of the community which have been difficult to reach due to language issues.	Representation on Resident Steering Group reflects diversity of the community	Paul Mullins	Ongoing

Stage 7: Public Sector Equality Duty

10. How do your proposals meet the Public Sector Equality Duty (PSED) 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	1. The objective of the regeneration project is to increase the amount and improve the choice of housing stock to reflect resident's needs. Also to improve the quality of housing for residents, including those who are categorised under the protected characteristics. 2. This project will further enhance the quality of housing for residents. This will improve and promote equality of opportunity across the protected characteristics. 3. The project will promote awareness of the importance of good quality housing. This should assist to foster good relations between people from different groups. The consultation process provides a forum for the community to come together and work together in helping to design the new homes, amenity areas and community facilities.
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Stage 8: Recommendation

11. 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 included in the Action Plan to be addressed.	✓
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?	Housing Regeneration Team		
Signed: (Lead officer completing EqIA)	Originally completed by Scott Causer and updated by Alison Pegg	Signed: (Chair of DETG)	
Date:	Initial Assessment 14 April 2015.	Date:	13-5-16
Date EqIA presented at Cabinet Briefing (if required)	N/A	Signature of DETG Chair (following Cabinet Briefing if relevant)	

