

Harrow Council- Affordable Homes Programme 2021-26 – Equality Diversity and Inclusion requirements

Harrow Councils' response to the Greater London Authority's (GLA) Affordable Homes Programme 2021-26 requirement to advance equality, diversity and inclusion (EDI), as a condition of receipt of funding from the GLA, is outlined below. The programme requires Harrow Council to meet a set of minimum standards and to propose an action plan that shows how EDI will be advanced.

Minimum Requirements

	Minimum standard	Evidence required to meet minimum standard	Harrow Council Evidence/Comments
1	All investment partners must offer equality, diversity and inclusion (EDI) training for all employees.	Partners to confirm that EDI training is offered for all employees, the types of training offered and content covered, as well as how many employees take up the training on a yearly basis.	<p>Harrow Council staff members are required to complete mandatory online EDI training (Equality, Diversity & Inclusion and Anti-Racism modules) every 2 years. The EDI module covers protected characteristics, discrimination, intersectionality, and unconscious bias. The Anti-Racism module covers the definition of key terminology, language, the impact of race and ethnicity, intersectionality in greater detail and more.</p> <p>Performance at 30th September 2024:</p>

	Minimum standard	Evidence required to meet minimum standard	Harrow Council Evidence/Comments
			<p>83.3% of all staff completed mandatory EDI training and associated modules by 30th September 2024.</p> <p>All new starters receive a face-to-face induction which includes EDI.</p> <p>The EDI team and the staff networks host events throughout the year to raise awareness and educate colleagues on specific issues and to celebrate diversity. We currently have 6 staff networks covering most protected characteristics. Examples of staff events include Black History Month, South Asian Heritage Month, International Women's Day, Carers Week, Inclusive Iftar, Windrush Day, Intergenerational Week, Diwali, LGBTQIA+ History Month and Disability History Month.</p>
2	All investment partners must implement a zero-tolerance approach to all forms of discrimination, harassment and bullying.	Partners to provide evidence of an organisational policy which evidences a zero-tolerance approach, which should set out objectives and how these are going to be met.	<p>At Harrow Council we believe that all our staff, management, residents, councillors, and suppliers have the right to work or live in an environment free from all forms of prejudice and abuse. The Council considers all forms of diversity to be positive and enriching for the borough and should be celebrated. We take a strict zero tolerance approach to any form of discrimination, harassment, victimisation, aggression or bullying including the prohibited conduct described in the Equality Act 2010. Any allegations of such behaviour will be taken seriously and investigated; and</p>

	Minimum standard	Evidence required to meet minimum standard	Harrow Council Evidence/Comments
			<p>appropriate action will be taken where deemed necessary.</p> <p>Harrow Council has a Zero Tolerance Statement and a Dignity and Respect at Work Policy. See attached documents and link below:</p> <p>Zero Tolerance Statement (Internal Document) `</p> <p>Harrow Council commissioned a Race Equality Report in 2020 and has developed a Race Equality Action Plan. See attached documents and link below:</p> <p>Race Equality in Harrow Report Final.pdf</p> <p>Harrow Council's approach to EDI to outlined in the EDI Strategic Framework. See attached document and link below:</p> <p>Equalities Strategic Framework.pdf</p>
3	All investment partners must broaden recruitment channels and encourage applications from diverse and under-represented groups.	Partners to confirm the current recruitment channels that they use and describe how they will expand on this to encourage applications from diverse and under-represented groups. Partners are encouraged to monitor the effectiveness of	We use a broad range of recruitment channels, such as LinkedIn, Indeed and direct adverts via careers sites to attract candidates. Harrow Council is Disability Confident Committed under the Disability Confident scheme.

	Minimum standard	Evidence required to meet minimum standard	Harrow Council Evidence/Comments
		these efforts and review them in light of their workforce data over time.	<p>The recruitment process has been reviewed and brought in-house, with changes made to the process.</p> <p>The Council follows a blind recruitment process to ensure that no applicants are adversely impacted.</p> <p>We have invested in the Diversity Talent Programme and conducted training on CV writing and Interview skills, to encourage internal applicants from under-represented groups. We have an Apprenticeship Manager in the Learning & Development Team and staff can access apprenticeships in a wide range of subjects delivered by recognised colleges, universities and training providers.</p> <p>Workforce Profile 2023-24</p>
4	All investment partners must collect and monitor workforce data to benchmark the diversity of their workforce against the local area of their organisation.	Evidence of data having been collected, and of it being monitored on an annual basis (as a minimum), with a summary of how this compares to the London benchmark. Partners are encouraged to provide information about how this data will inform their practices and their approach to advancing EDI in their own organisations.	Workforce data is reviewed annually by HR and reported on through statutory reporting. The Council produces an internal Annual Workforce Equality Report. There is an EDI Board chaired by the Managing Director/Head of Paid Service that oversees progress on EDI.

	Minimum standard	Evidence required to meet minimum standard	Harrow Council Evidence/Comments
		The Workforce Data Equality Guide and Workforce Data Equality – London Benchmarking Tool in particular can support partners in delivering this.	Harrow's Workforce Equality Report contains a snapshot of our workforce, broken down into each of the protected characteristics where data is held: Workforce Profile 2023-24
5	All investment partners must publish their gender and ethnicity pay gaps.	Links to where this is published.	<ul style="list-style-type: none"> • Harrow Gender pay gap report 2023 • Harrow Gender pay gap infographic 2023 • Harrow Gender pay gap report 2022 • Harrow Gender pay gap infographic 2022 • Harrow Gender pay gap report 2021 • Harrow Gender pay gap infographic 2021 • Harrow Gender pay gap report 2020 • Harrow Gender pay gap infographic 2020 <p>Data on race and pay band is included in section 7 (page 14) of the Workforce Equality Report 2020-2021: Workforce Profile 2023-24</p>

Equality, Diversity and Inclusion Action Plan

Theme	Objective	Action	Target data	Measure of success
Theme 1: Organisational equality, diversity and fairness	Promoting best practice in employment by ensuring workers are treated and paid fairly, tackling discrimination and bias and advancing equality, diversity and inclusion to make every employee feel valued.	<p>All new recruiting managers must complete mandatory Recruitment & Selection training. By completing the course recruiting managers will</p> <ul style="list-style-type: none"> • Understand the importance of legislation within recruitment • Understand what unconscious bias is and how this can affect recruitment • Be aware of HR planning and its importance • Be able to complete a role profile • Be able to demonstrate different interview questioning techniques 	Ongoing	Recruiting managers equipped to manage selection and recruitment in a fair and equitable manner.
		Harrow 'manager-led' Panels must have a minimum of 2	Ongoing	Selection & Recruitment carried out in a fair and

Theme	Objective	Action	Target data	Measure of success
		<p>panel members who are appropriately trained in Harrow's Recruitment and Selection procedures. The Chair of the panel is responsible for ensuring that the process is carried out fairly.</p> <p>Recruiting Managers in the Housing Regeneration team convene balanced panels when carrying out selection and recruitment.</p>		equitable manner and monitored.
		Workforce data is reviewed annually and sets targets to reflect the community that it serves at different levels.	Ongoing	The organisation understands the diversity profile of its employees and reflects the community that it serves.
		A range of Learning & Development opportunities	Ongoing	Employees have equal access to opportunities

Theme	Objective	Action	Target data	Measure of success
		<p>are available including coaching, shadowing, the Diversity Talent Programme, apprenticeships, and a wide selection of online and face to face courses.</p> <p>The Council is registered to the Development Academy: Housing Development Academy – Skills for building affordable homes (futureoflondon.org.uk)</p>		for development and progression.
Theme 2: Sustainable and diverse supply chains	Ensuring that environmental, social and economic sustainability is promoted throughout organisations' activities and supply chains and encouraging diversity through procurement activities.	The Procurement service monitors how many of the companies we award contracts to are Harrow based SMEs and is developing plans to monitor the diversity of our supply chain.	Annual report	<p>SMEs are successful in securing council contracts</p> <p>Out of 260 active contracts 37 are Harrow SME's</p> <p>.</p>

Theme	Objective	Action	Target data	Measure of success
		With the UK Shared Prosperity Fund (UKSPF) our Economic Development service is building job brokerage to train residents in the skills SMEs need. We engage with 14 traders' groups plus all the others listed. We are re-introducing welcome packs to new businesses. Our brokers are stepping up business engagements to get people into work. Our Economic Strategy 23-26 is going to Cabinet on 29 June with an EQIA.		
		Harrow Council declared a Climate Emergency in 2019 in response to the serious consequences of human induced greenhouse gas emissions causing global warming and the range of	Annual report	<p>The Council's contractors are signed up to the Low Carbon Charter.</p> <p>Measure:</p>

Theme	Objective	Action	Target data	Measure of success
		<p>associated negative ecological impacts.</p> <p>The Council aims to make the London Borough of Harrow carbon neutral by 2030, taking into account both production and consumption of emissions. A key action is to use procurement processes to help deliver low carbon goods and services via its supply chain.</p> <p>We have a Low Carbon Procurement Policy and Charter that requires us to test the progress all potential suppliers are making towards carbon neutrality. We require all winning companies to adopt the principles of our Low Carbon Charter.</p>		<p>No of contractors signed up to the Charter as a percentage of the overall number of contractors appointed by the council.</p> <p>We have 260 Active contracts and 81 have signed up to the climate charter. The climate charter is part of our “selection questionnaire” and therefore any procurement activity over £100k tenders must be signed off.</p> <p>The Council makes progress towards its carbon neutrality target.</p>

Theme	Objective	Action	Target data	Measure of success
		Climate commitment charter: Partnering with our suppliers to reduce our carbon impacts (harrow.gov.uk) We work in partnership with the West London Alliance on this agenda, including on training for SMEs- see https://youtu.be/4iDTgTv0_JY		
		Harrow Council explores ways to improve the economic, social and environmental well-being of its area through procurement processes for works contracts, subject to public procurement regulations, and has a Social Value Policy. Social Value linked to contracts is monitored.	Annual report	Opportunities for social value are maximised and measured. We will report annually on outturn against agreed Social Value commitments for each affordable housing project

Theme	Objective	Action	Target data	Measure of success
		A range of social value activities are undertaken by Higgins and Breyer related to the Grange Farm Estate Regeneration project and targets are set with Wates for regeneration projects under the HSDP. Airey Miller, Country and City Construction are also committed to activities in other projects.		
		The Housing Development Academy offers short courses on the project management skills that deliver high quality new homes. Learning is based in real-life experience and our courses support employers to grow their own talent, with a strong emphasis on diversity.	Ongoing October 2024	Employees have equal access to opportunities for development and progression that are relevant to their needs and roles. Housing Regeneration staff attended and completed learning (10

Theme	Objective	Action	Target data	Measure of success
		Housing Development Academy – Skills for building affordable homes (futureoflondon.org.uk) Housing Regeneration will make full use of its 10 places at the Housing Development Academy of which 5 have been attended.		places). Knowledge and skills increased.
Theme 3: Working together with Londoner	Amplifying the voices of residents and Londoners through organisations' work, especially those that are under-represented or face significant housing-related inequalities.	See the Social Value action in Theme 2 A range of social value activities were undertaken by Higgins and Breyer related to the Grange Farm Estate Regeneration project, in partnership with the Steering Group and in line with needs and aspirations of the residents on the estate. VCS partners support these	Ongoing October 2024	Opportunities for social value are maximised and measured taking into account the needs and aspirations of residents. Social Value Framework in place for Phases 2 and 3, reflecting the needs and aspirations of the local community. This will be monitored quarterly by the Grange Farm

Theme	Objective	Action	Target data	Measure of success
		activities and ensure that the voice of the residents is heard. An Independent Tenant Advisor is commissioned by the Council for the estate regeneration project.		Steering Group and the Council
		The Social Value Framework for Phases 2 and 3 of the Grange Farm Estate Regeneration Project will be agreed with the HSDP/Wates.		
		<p>Harrow Council Housing Services has an active Residents Board and a</p> <p>Resident Engagement Strategy which was co-produced with residents.</p>	Ongoing	<p>Residents are engaged effectively and feel valued and involved.</p> <p>Measured through the annual Satisfaction survey, the baseline having been set by the 2023 survey for the following TSM's: Keeps</p>

Theme	Objective	Action	Target data	Measure of success
		<u>Resident Engagement Strategy – London Borough of Harrow</u>		you informed, Easy to deal with, Listens and Acts <u>TSM 23/24</u>
		An active Steering Group is in place for the Grange Farm Estate Regeneration Project, with a wide range of initiatives taking place at the community centre and on the estate in partnership with other stakeholders including surplus food markets and a warm hub.	Ongoing	Residents on the estate are engaged effectively.
		We set out our standards for consultation, communication and engagement with the public, regarding the work that the council does and, in particular, the changes that we propose that affect the lives of people in Harrow.	Ongoing	Residents feel informed and that their views are valued.

Theme	Objective	Action	Target data	Measure of success
		<p>A range of consultation methods are used, including for housing development sites. Harrow Council has recently launched a new consultation and engagement hub: MyHarrow Talk</p> <p>This is a space for residents and local businesses to have your say and take the opportunity to feedback, share your ideas, and influence the services we provide.</p>		
		<p>Harrow Council uses Equality Impact Assessments (EqIAs) as a systematic tool to test the impact of new or changes to existing policies, functions, projects and services that impact on individuals and groups. They are used to identify any adverse impact,</p>	Ongoing	Adverse impact, illegal discrimination or unmet needs or requirements are identified and addressed when making decisions.

Theme	Objective	Action	Target data	Measure of success
		illegal discrimination or unmet needs or requirements when making decisions. Training, guidance notes, and a template are available for staff, as well as support from the EDI team.		EQIA's are published and available on the council's website.