

Equality Impact Assessment (EqIA)



You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqIA)		
Type of Decision:	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
Title of Proposal	Homelessness & Rough Sleeping Strategy	Date EqIA created 02/12/2025
Name and job title of completing/lead Officer	Ellen Terry Graduate Management Trainee Meghan Zinkewich-Peotti Head of Insight & Housing Strategy	
Directorate/ Service responsible	Housing, Housing & Regeneration	
Organisational approval		
EqIA approved by	Jennifer Rock Partnership and Inclusion Officer Policy, Partnerships and Cohesion Team	Signature <input checked="" type="checkbox"/> Tick this box to indicate that you have approved this EqIA: 21.03.25

1. Summary of proposal, impact on groups with protected characteristics and mitigating actions

a) What is your proposal?

The Homelessness & Rough Sleeping Strategy is being reviewed, taking into consideration changes in policy and legislation, changes in local priorities and challenges, and to meet statutory requirements. Under the Homelessness Act 2002, every Local Authority has a statutory requirement to carry out a homelessness review for their district and formulate and publish a homelessness strategy based on the results of the review. The London Borough of Harrow is required to publish a new homelessness strategy, based on the results of its review of homelessness, every 5 years.

b) Summarise the impact of your proposal on groups with protected characteristics

The Homelessness and Rough Sleeping Strategy reviews homelessness within the borough and sets out priorities for addressing homelessness and rough sleeping. The needs of different groups, including those with protected characteristics, are considered in the review and the strategy.

Through this strategy the council aims to:

- build capacity and resilience in the community, by working with the right partners, in the right way, and at the right time, to unite our assets to deliver accessible and consistent housing advice, achieve early prevention of homelessness, and reduce the use of temporary accommodation
- ensure our approach to procuring homelessness accommodation and placing homeless households in accommodation is clear to applicants, officers, and professionals, to manage expectations, help residents to make informed decisions and reduce complaints, challenges and reviews.

The homelessness and rough sleeping strategic priorities for 2025-2030, developed with stakeholders and partners, are:

1. **Work collaboratively with a wide range of partners** to build capacity and resilience in the community and effectively prevent and address homelessness and rough sleeping.
2. **Deliver early advice and support** to empower residents, help them maintain their current accommodation and make confident and informed decisions about their housing options.
3. **Assist households to access suitable, affordable, and settled accommodation** that **matches** their housing needs.

4. **Support the wellbeing of residents** by improving access to consistent and empathetic advice and to support that is delivered in a psychologically informed environment.

The approach to delivering these priorities will be ambitious, outward focused and innovative.

This means that the Housing service will work with residents, statutory services, and the voluntary and community sector towards a collective response. The Housing service will work with partners to encourage early contact from residents at risk of homelessness and will work with them and their landlords to sustain their current accommodation where this is possible, or alternatively to find suitable alternative housing options. The number of households in temporary accommodation will be reduced by working with private landlords, acquiring properties, and enabling housing development and regeneration.

c) Summarise any potential negative impact(s) identified and mitigating actions

There is no anticipated adverse impact under any protected characteristics as a result of the new strategy.

2. Assessing impact		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact											
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to borough profile data , equalities data , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on each group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.													
Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact								
			Minor	Major									
Age	<p>In Harrow, there has been an increase of 19.4% in people aged 65 years and over, an increase of 7.8% in people aged 15 to 64 years, and an increase of 7.5% in children aged under 15 years.</p> <table border="1"> <thead> <tr> <th colspan="2">Age Groups (C 2021)</th> </tr> </thead> <tbody> <tr> <td>0-17 years</td> <td>58,366</td> </tr> <tr> <td>18-64 years</td> <td>162,658</td> </tr> <tr> <td>65+ years</td> <td>40,177</td> </tr> </tbody> </table> <p>Between the last two censuses, the average (median) age of Harrow increased by two years, from 36 to 38 years of age. This area had a higher average (median) age than London as a whole in 2021 (35 years) but a lower average (median) age than England (40 years). The median age is the age of the person in the middle of the group, meaning that one half of the group is younger than that person and the other half is older. The number of people aged 35 to 49 years rose by just under 8,000 (an increase of 15.9%), while the number of residents between 20 and 24 years fell by just under 950 (5.8% decrease).</p>	Age Groups (C 2021)		0-17 years	58,366	18-64 years	162,658	65+ years	40,177	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Age Groups (C 2021)													
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	<p>In September 2024, the London Borough of Harrow recorded 1,278 Temporary Accommodation clients of which 1,244 clients were aged between 18-64 years (97.3% of all TA clients) and 52 clients were aged 65 years and above (4.1% of all TA clients).</p> <p>In relation to homelessness applicants, under Part VII of the Housing Act 1996 those considered vulnerable due to their age, or with whom such a person resides or might reasonably be expected to reside, are a group of people considered to be in priority need. Therefore, additional consideration is provided for homelessness applicants with this characteristic under the Housing Act 1996 and the associated Statutory Guidance. This may apply to older people, children and care leavers.</p> <p>While the overriding priority is to prevent and relieve homelessness the need to relocate, sometimes several times, can be disruptive to households. The Homelessness and Rough Sleeping Strategy sets out which groups will be allocated local homelessness accommodation to mitigate where possible this potential disruption.</p> <p>When allocating homeless accommodation, priority for local accommodation within Harrow will be given to:</p> <ul style="list-style-type: none"> • households with children in Key Stage 4 (Years 10 & 11) and Key Stage 5 (Years 12 & 13) who are due to sit exams within the next six months • households with a child with special educational needs receiving education or support within the borough where relocation would be detrimental to their wellbeing • households with one or more persons (all ages) receiving physical or mental health treatment from a specialist hospital unit or local community health service, where a transfer to another NHS service is not possible, or where they are at a critical point in their treatment • households with an individual (aged 18+) receiving a significant care package from Adult Social Care and a range of healthcare options that cannot be transferred within a reasonable timeframe, where relocation would be detrimental to their wellbeing. • households with exceptional circumstances, where applicants demonstrate an exceptional need to be housed close to the London Borough of Harrow. <p>The Council recognises it also has duties to children and young people under other legislation, such as the Children Act 1989 and the Children and Families Act 2014, pursuant to which accommodation may be provided to the person or to the person and their family.</p>				
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	<p>The Homelessness and Rough Sleeping Strategy prioritises preventing homelessness for all age groups, as well as reducing the number of households in temporary accommodation. It is anticipated that the strategy will have a positive impact on residents across all age groups who are at risk of or experiencing homelessness.</p>				
Disability	<p>In 2021, 5.9% of Harrow residents were identified as being disabled and limited a lot. This figure decreased from 8.2% in 2011. These are age-standardised proportions.</p> <p>In 2021, 7.3% of Harrow residents were identified as being disabled and limited a little. This makes for 13.2% of Harrow residents being disabled, a decrease from 17.5% in 2011.</p> <p>Census 2021 was undertaken during the coronavirus (COVID-19) pandemic. This may have influenced how people perceived their health status and activity limitations, and therefore may have affected how people chose to respond.</p> <p>In September 2024, the London Borough of Harrow recorded that of 1278 Temporary Accommodation clients asked, 3% of clients recorded having a learning disability, 14% recorded having a history of mental health problems and 14% recorded having physical ill health and disability.</p> <p>While the overriding priority is to prevent and relieve homelessness the need to relocate, sometimes several times, can be disruptive to households. The Homelessness and Rough Sleeping Strategy sets out which groups will be allocated local homelessness accommodation to mitigate where possible this potential disruption.</p> <p>When allocating homeless accommodation, priority for local accommodation within Harrow will be given to:</p> <ul style="list-style-type: none"> households with one or more persons receiving physical or mental health treatment from a specialist hospital unit or local community health service, where a transfer to another NHS service is not possible, or where they are at a critical point in their treatment households containing a child with special educational needs receiving education or support within the London Borough of Harrow, where relocation would be detrimental to their well-being 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<ul style="list-style-type: none"> households containing an individual receiving a significant care package from Adult Social Care and a range of healthcare options that cannot be transferred within a reasonable timeframe, where relocation would be detrimental to their well-being. <p>The Homelessness and Rough Sleeping Strategy prioritises preventing homelessness for different groups, including disabled people, as well as reducing the number of households in temporary accommodation. It is anticipated that the strategy will have a positive impact on disabled residents at risk of or experiencing homelessness.</p>				
Gender reassignment	<ul style="list-style-type: none"> - 90.12% of Harrow residents described themselves as having the same gender identity as sex registered at birth (<i>188,901 respondents</i>) - 0.53% of Harrow residents described themselves as having a gender identity which differs to the sex registered at birth, but gave no specific identity (<i>1,108 respondents</i>) - 0.15% of Harrow residents described themselves as a Trans woman (<i>318 respondents</i>) - 0.16 of Harrow residents described themselves as a trans man (<i>342 respondents</i>) - 0.03% of Harrow residents described themselves as non binary (<i>57 respondents</i>) - 0.03% of Harrow residents described themselves as 'All other gender identities' (<i>59 respondents</i>) -8.98% of Harrow residents did not respond (<i>18,832 respondents</i>) <p>There is insufficient data on homeless applicants from this protected characteristic group. No adverse impact is anticipated to arise from the proposed strategy.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Marriage and Civil Partnership	<p>The increase in the percentage of people aged 16 years and over who had never been married or in a civil partnership was greater across England (3.3 percentage points) than in Harrow (1.0 percentage points).</p> <p>In Harrow, the percentage of adults who had never been married or in a civil partnership increased from 32.3% in 2011 to 33.2% in 2021. During the same period, the percentage across England increased from 34.6% to 37.9%.</p> <p>The percentage of adults who were married or in a civil partnership in Harrow increased from 53.8% to 53.9%, while the percentage of adults who had divorced or dissolved a civil partnership increased from 5.4% to 5.7%.</p> <p>These figures include same-sex marriages and opposite-sex civil partnerships in 2021, neither of which were legally recognised in England and Wales in 2011. Same-sex</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>marriages have been legally recognised in England and Wales since 2014 and opposite-sex civil partnerships have been recognised since 2019.</p> <p>The percentage of adults who had never married or registered a civil partnership in Harrow increased by 1.0 percentage points</p> <p>There is insufficient data on marriage and civil partnership as it relates to homeless applicants. No adverse impact is anticipated to arise from the proposed strategy.</p>				
Pregnancy and Maternity	<p>ONS births figures show Harrow as having 3,312 live births in 2021. 14 live births per 1000 population is higher than the England & Wales average of 10.8</p> <p>-The borough has a higher-than-average infant mortality rate in London, at a rate of 3.9 deaths per 1000 live births, which is an indicator of poverty and inequality in the borough.</p> <p>In relation to homelessness applicants, under Part VII of the Housing Act 1996 someone who is pregnant, or with whom such a person resides or might reasonably be expected to reside, are people considered to be in priority need. Therefore additional consideration is provided for homelessness applicants with this characteristic under the Housing Act 1996 and the associated Statutory Guidance.</p> <p>When allocating homeless accommodation, priority for local accommodation within Harrow will be given to:</p> <ul style="list-style-type: none"> households containing an individual receiving a significant care package from Adult Social Care and a range of healthcare options that cannot be transferred within a reasonable timeframe, where relocation would be detrimental to their well-being. This might apply to someone with a high-risk pregnancy or with a baby who has a serious illness requiring specialist healthcare. households with exceptional circumstances, where applicants demonstrate an exceptional need to be housed close to the London Borough of Harrow. This might apply to someone with specific needs and special reasons related to pregnancy or maternity. <p>Specific consideration is given to homeless households with babies under the age of 2 years to ensure that they have sufficient space for a cot when provided with temporary accommodation.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p>The Homelessness and Rough Sleeping Strategy prioritises preventing homelessness and reducing the number of households in temporary accommodation. It is anticipated that the strategy will have a positive impact on different groups residents who are at risk of or experiencing homelessness, including those who are pregnant or have recently had a baby.</p>														
Race/ Ethnicity	<p>In 2021, 7.2% of Harrow residents identified their ethnic group within the "Other" category ("Arab" or "Any other ethnic group"), up from 2.9% in 2011. The 4.3 percentage-point change was the largest increase among high-level ethnic groups in this area. Across London, the percentage of people from the "Other ethnic groups" ("Arab" or "Any other ethnic group") increased from 3.4% to 6.3%, while across England the percentage increased from 1.0% to 2.2%.</p> <p>In 2021, 45.2% of people in Harrow identified their ethnic group within the "Asian, Asian British or Asian Welsh" category (compared with 42.6% in 2011), while 36.5% identified their ethnic group within the "White" category (compared with 42.2% the previous decade). The percentage of people who identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category decreased from 8.2% in 2011 to 7.3% in 2021. There are many factors that may be contributing to the changing ethnic composition of England and Wales, such as differing patterns of ageing, fertility, mortality, and migration. Changes may also be caused by differences in the way individuals chose to self-identify between censuses.</p> <p>The race/ethnicity statistics from the 2021 Census for Harrow for those who responded to the question was as follows:</p> <table><tr><td>Asian, Asian British or Asian Welsh</td><td>118,152 (45.2%)</td></tr><tr><td>Black, Black British, Black Welsh, Caribbean or African</td><td>19,151 (7.3%)</td></tr><tr><td>Mixed or multiple ethnic groups</td><td>9,833 (3.8%)</td></tr><tr><td>White</td><td>95,233 (36.5%)</td></tr><tr><td>Other ethnic groups</td><td>18,836 (7.2%)</td></tr></table> <p>Homelessness affects all communities regardless of ethnicity. However, some communities are disproportionately affected by homelessness each year. While only 7.3% of Harrow’s population identified as Black, Black British, Black Welsh, Caribbean or African in 2021, this group accounted for 22% of all homelessness applications made in the last 12 months. People</p>	Asian, Asian British or Asian Welsh	118,152 (45.2%)	Black, Black British, Black Welsh, Caribbean or African	19,151 (7.3%)	Mixed or multiple ethnic groups	9,833 (3.8%)	White	95,233 (36.5%)	Other ethnic groups	18,836 (7.2%)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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	<p>who identify as being from Black ethnic groups are disproportionately affected by homelessness in Harrow. Over the past five years people who identified as being from Black ethnic groups in Harrow were 4.5 times more likely to become homeless or be threatened with homelessness, when compared those who identified from White ethnic groups, and 4.6 times more likely than those who identified from White British ethnic groups.</p> <p>In the last 12 months, individuals from “Any other Asian background” accounted for 20% of all homelessness application in Harrow. This makes the “Any other Asian background” ethnic group the largest among all homelessness applications.</p> <p>In September 2024, the London Borough of Harrow recorded a total of 1278 Temporary Accommodation clients, of which 17% identified as “Any other Asian background”,10% identified as “Black/African/Caribbean/Black British: African” and 9% identified as “Any other White background”.</p> <p>Additional work will be undertaken to understand areas of disproportionality by ethnicity and homelessness and rough sleeping services will be targeted and modified accordingly.</p> <p>The Homelessness and Rough Sleeping Strategy prioritises preventing homelessness across all ethnic groups, as well as reducing the number of households in temporary accommodation. It is anticipated that this will have a positive impact on residents across all ethnic groups who are at risk of or experiencing homelessness.</p>						
Religion or belief	Christian	88,602 (33.9%)		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Buddhist	2,812 (1.1%)					
	Hindu	67,392 (25.8%)					
	Jewish	7,304 (2.8%)					
	Muslim	41,503 (15.9%)					
	Sikh	2,743 (1.1%)					
	Other religion	7,695 (2.9%)					
	No religion	27,748 (10.6%)					
	Not answered	15,404 (5.9%)					

	<p>In 2021, 15.9% of Harrow residents described themselves as Muslim, up from 12.5% in 2011. The rise of 3.4 percentage points was the largest increase of all broad religious groups in Harrow. Because the census question about religious affiliation is voluntary and has varying response rates, caution is needed when comparing figures between different areas or between censuses.</p> <p>Across London, the percentage of residents who described themselves as Muslim increased from 12.6% to 15.0%, while across England the percentage increased from 5.0% to 6.7%. In 2021, 15.9% of usual residents in Harrow described themselves as Muslim.</p> <p>In 2021, 33.9% of people in Harrow described themselves as Christian (down from 37.3%), while 25.8% described themselves as Hindu (up from 25.3% the decade before).</p> <p>There are many factors that can cause changes to the religious profile of an area, such as a changing age structure or residents relocating for work or education. Changes may also be caused by differences in the way individuals chose to self-identify between censuses.</p> <p>Religious affiliation is the religion with which someone connects or identifies, rather than their beliefs or religious practice.</p> <p>The Homelessness and Rough Sleeping Strategy prioritises preventing homelessness across all religious groups, as well as reducing the number of households in temporary accommodation. There is insufficient data on religion or belief as it relates to homeless applicants but it is anticipated that the strategy will have a positive impact on residents across all religious groups who are at risk of or experiencing homelessness.</p>				
Sex	<p>According to the 2021 Census 50.7% of Harrow's population was female and 49.3% were male.</p> <p>The London Borough of Harrow recorded in September 2024 a total of 1278 Temporary Accommodation clients, of which 64% were female and 35% were male.</p> <p>The Homelessness and Rough Sleeping Strategy prioritises preventing homelessness for female and male residents, as well as reducing the number of households in temporary accommodation. It is anticipated that the strategy will have a positive impact on both female and male residents who are at risk of or experiencing homelessness.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Sexual Orientation	The 2021 Census shows that 4.27 % of Londoners identify as LGBTQIA+, the highest of any UK region ¹ . 1.65% of Harrow residents identify as LGBTQIA+, this is approx. 4k people ² . This is reflected in more detail in the table below		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
	Straight or Heterosexual	182,702 (87.2%)				
	Gay or Lesbian	1,361 (0.6%)				
	Bisexual	1,873 (0.9%)				
	Pansexual	787 (0.4%)				
	Asexual	59 (0.0%)				
	Queer	22 (0.0%)				
	All other sexual orientations	137 (0.1%)				
	Not answered	22,680 (10.8%)				
	<p>In September 2024, the London Borough of Harrow recorded answers for 871 Temporary Accommodation clients, of which 83% identified themselves as Heterosexual/Straight, 1% bisexual, 2% other and 14% prefer not to say.</p> <p>There is insufficient data on sexual orientation as it relates to homeless applicants. No adverse impact is anticipated to arise from the proposed strategy.</p>					
<p>2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?</p> <p><input type="checkbox"/> Yes No <input checked="" type="checkbox"/></p>						
<p>If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below</p>						
<p>2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?</p>						

¹ Source: 2021 Census

² Source: 2021 Census

<input type="checkbox"/> Yes No <input checked="" type="checkbox"/>
If you clicked the Yes box, Include details in the space below

3. Actions to mitigate/remove negative impact				
<p>Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.</p> <p>In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.</p>				
State what the negative impact(s) are for each group, identified in section 2. In addition, you should also consider, and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact, please state below.	Deadline date	Lead Officer

<p>4. Public Sector Equality Duty</p> <p>How does your proposal meet the Public Sector Equality Duty (PSED) to:</p> <ol style="list-style-type: none"> 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 review of the strategy has included consultation with stakeholders and a comprehensive review of data which have considered the protected characteristics and the Equality Act 2010. In every case, the housing needs assessment and the provision of housing advice and assistance is based on individual circumstances and a Personal Housing Plan.

Consultation with stakeholders has been undertaken using different formats, which contributes to advancing equality of opportunity between people from different groups. One of the outcomes of the review of the strategy is to ensure that our priorities are clear to stakeholders, which contributes to fostering good relations between people from different groups.

The proposed strategy prioritises meeting the needs of vulnerable people and addressing homelessness and rough sleeping. The priorities aim to meet the needs of different groups, some of which are protected under the Equality Act 2010.

5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies

☒ 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

Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4

☐ Outcome 3

This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.

Include details here