

# Call-In Sub-Committee AGENDA

**DATE:** Tuesday 10 March 2015

**TIME:** 5.30 pm

**VENUE:** Committee Rooms 1 & 2,  
Harrow Civic Centre

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## **MEMBERSHIP** (Quorum 3)

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**Chair:** Councillor Jerry Miles

**Councillors:**

Jeff Anderson  
Barry Kendler

Richard Almond  
Paul Osborn (VC)

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**Reserve Members:**

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- |                      |                   |
|----------------------|-------------------|
| 1. Phillip O'Dell    | 1. Kam Chana      |
| 2. Jo Dooley         | 2. Lynda Seymour  |
| 3. Kiran Ramchandani | 3. Stephen Wright |

**Contact:** Una Sullivan, Democratic & Electoral Services Officer  
Tel: 020 8424 1785 E-mail: [una.sullivan@harrow.gov.uk](mailto:una.sullivan@harrow.gov.uk)

## **AGENDA - PART I**

### **1. ATTENDANCE BY RESERVE MEMBERS**

To note the attendance at this meeting of any duly appointed Reserve Members.

Reserve Members may attend meetings:-

- (i) to take the place of an ordinary Member for whom they are a reserve;
- (ii) where the ordinary Member will be absent for the whole of the meeting; and
- (iii) the meeting notes at the start of the meeting at the item 'Reserves' that the Reserve Member is or will be attending as a reserve;
- (iv) if a Reserve Member whose intention to attend has been noted arrives after the commencement of the meeting, then that Reserve Member can only act as a Member from the start of the next item of business on the agenda after his/her arrival.

### **2. DECLARATIONS OF INTEREST**

To receive declarations of disclosable pecuniary or non pecuniary interests, arising from business to be transacted at this meeting, from:

- (a) all Members of the Sub-Committee;
- (b) all other Members present.

### **3. MINUTES (Pages 5 - 10)**

That the minutes of the meeting held on 2 October 2014 be taken as read and signed as a correct record.

### **4. PROTOCOL FOR THE OPERATION OF THE CALL-IN SUB-COMMITTEE (Pages 11 - 12)**

### **5. CALL-IN OF THE CABINET DECISION - 19 FEBRUARY 2015 - ENVIRONMENT AND ENTERPRISE MEDIUM TERM FINANCIAL STRATEGY IMPLEMENTATION PLAN (Pages 13 - 132)**

The following documents are attached:

- a) Notice invoking the Call-in
- b) Record of the Cabinet Decision taken on 19 February 2015
- c) Report submitted to Cabinet on 19 February 2015

## **AGENDA - PART II - NIL**

### **LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985**

In accordance with the Local Government (Access to Information) Act 1985, this meeting is being called with less than 5 clear working days' notice by virtue of the special circumstances and grounds for urgency stated below:-

Under Committee Procedure Rule 46.6 a meeting of the Call-In Sub-Committee must be held within 7 clear working days of the receipt of a request for call-in. This meeting therefore had to be arranged at very short notice and it was not possible for the agenda to be published 5 clear working days prior to the meeting.

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# CALL-IN SUB-COMMITTEE MINUTES

## 2 OCTOBER 2014

**Chairman:** \* Councillor Jerry Miles

**Councillors:** \* Richard Almond \* Barry Kendler  
\* Jeff Anderson \* Paul Osborn

<b>In attendance:</b>	Keith Ferry	Minute 6
<b>(Councillors)</b>	Barry Macleod-Cullinane	Minute 6
	Chris Mote	Minute 6
	Janet Mote	Minute 6
	Kanti Rabadia	Minute 6

\* Denotes Member present

### 1. Attendance by Reserve Members

**RESOLVED:** To note that there were no Reserve Members in attendance.

### 2. Declarations of Interest

A Member of the Sub-Committee asked officers to look into the call-in procedure where a Member of the Sub-Committee had a spouse who was a Member of Cabinet. The Member asked that a report be prepared for a future meeting of the Constitution Review Working Group.

**RESOLVED:** To note that the following interests were declared:

Agenda Item 6 – Call-in of the Cabinet Decision (18 September 2014) – Outcome of Consultation on Options for the Council’s Senior Management Arrangements

Councillor Jeff Anderson declared a non-pecuniary interest in that his wife was a Member of Cabinet which had made the decision which had been

called-in. He would remain in the room whilst the matter was considered and voted upon.

Councillor Barry Macleod-Cullinane declared a non-pecuniary interest in that he was a Member of the Cabinet which had previously decided to delete the position of Chief Executive. He was also a Member of the Chief Officers' Employment Panel and a previous employee of the Council. He would remain in the room whilst the matter was considered and voted upon.

Councillor Paul Osborn declared a non-pecuniary interest in that he was a Member of the Cabinet which had previously decided to delete the position of Chief Executive and he was also a Member of the Chief Officers' Employment Panel. He would remain in the room whilst the matter was considered and voted upon.

Councillor Chris Mote declared a non-pecuniary interest in that he was a Member of the Cabinet which had previously decided to delete the position of Chief Executive. He would remain in the room whilst the matter was considered and voted upon.

Councillor Janet Mote declared a non-pecuniary interest in that she was a Member of the Cabinet which had previously decided to delete the position of Chief Executive. She would remain in the room whilst the matter was considered and voted upon.

### **3. Appointment of Vice Chairman**

**RESOLVED:** That Councillor Paul Osborn be appointed as Vice-Chairman of the Sub-Committee for the remainder of the Municipal Year 2014-15.

### **4. Minutes**

**RESOLVED:** That the minutes of the meeting held on 25 February 2014 be taken as read and signed as a correct record.

## **RESOLVED ITEMS**

### **5. Protocol for the Operation of the Call-In Sub-Committee**

The Chair drew attention to the document 'Protocol for the Operation of the Call-In Sub-Committee'. He outlined the procedure to be followed at the meeting, and the options open to the Sub-Committee at the conclusion of the process.

In accordance with Committee Procedure Rule 46.5, a notice seeking to invoke the call-in procedure must state at least one of the following grounds in support of the request for a call-in of the decision:-

- (a) inadequate consultation with stakeholders prior to the decision;
- (b) the absence of adequate evidence on which to base a decision;

- (c) the decision is contrary to the policy framework, or contrary to, or not wholly in accordance with the budget framework;
- (d) the action is not proportionate to the desired outcome;
- (e) a potential human rights challenge;
- (f) insufficient consideration of legal and financial advice.

He informed the Sub-Committee that the grounds (a), (b), (c) and (f) had been cited on the Call In notice, and all grounds had been deemed to be valid for the purposes of Call-In.

**RESOLVED:** That the Call-In would be determined on the basis of the following grounds:

- (a) inadequate consultation with stakeholders prior to the decision;
- (b) the absence of adequate evidence on which to base a decision;
- (c) whether the decision was contrary to the policy framework, or contrary to, or not wholly in accordance with the budget framework;
- (d) insufficient consideration of legal and financial advice.

**6. Call-In of the Cabinet Decision (18 September 2014) - Outcome of Consultation on options for the Council's Senior Management Arrangements**

The Sub-Committee received the papers in respect of the call-in notice submitted by 10 Members of Council in relation to the decision made by Cabinet on Outcome of Consultation on Options for the Council's Senior Management Arrangements.

The Chair advised the Sub-Committee on the suggested order of proceedings and reminded Members of the timings allowed for submissions and questions.

A Member of the Sub-Committee expressed concern that a meeting of the Chief Officers Employment Panel had taken place before the Sub-Committee had met. He commented that the meeting of the Chief Officers' Employment Panel should have been put on hold until this meeting of the Sub-Committee had taken place.

The Chair invited the lead representative of the signatories, Councillor Barry Macleod-Cullinane, to present the reasons for the call-in of the decision to the Sub-Committee.

He stated that:

- the Council had to make a significant financial savings in the next couple of years. By re-establishing the role of the Chief Executive this would add to the savings required;
- there had been an inadequate amount of consultation and this had only involved members of staff. There had been no widening of the consultation to involve residents. Additionally the time period over which the consultation had taken place was too short;
- in a poll conducted by a local newspaper, 66% of residents had indicated that the role of the Chief Executive should remain deleted;
- there had been no engagement with the Overview and Scrutiny Process on the new proposals;
- there was no independent evidence obtained to support the new proposals. The only source of independent evidence from the Council's auditors had not highlighted any issues with the Chief Executive role having been deleted;
- there was no specific evidence contained in the report to Cabinet which supported its decision;
- the Council had passed its Revenue Budget for the financial year. This had included financial savings of up to £1.5 million as a result of the deletion of the role of the Chief Executive. By re-instating the position this would be contrary to the Budget Framework;
- re-establishing the role of the Chief Executive was contrary to the Council's adopted Pay Policy Statement;
- the Corporate Plan also referred to the Council achieving Value for Money. Re-introducing the role of the Chief Executive would be contrary to this principle.

The Deputy Leader, on behalf of the Leader of the Council, responded by stating the following points:

- officers of the Council were entitled to commence making preparations for the decision made by Cabinet even if it had been called-in;
- there was no legal requirement for Cabinet to consult when it had considered the proposals which were subsequently agreed. However an extensive consultation had taken place with all members of staff;
- the consultation with the staff had indicated a preference to re-instate the position of the Chief Executive;



- the role of the Chief Executive had been deleted on 22 February 2014 and the Financial Year ended on 31 March 2014. This had meant that the Council's auditors did not have a sufficient period of time to determine whether the deletion of the role of the Chief Executive had significantly impacted upon the Council.

In response to questions raised by the Lead Signatory and Members of the Sub-Committee, the Deputy Leader made the following points:

- the consultation with staff had been based on questions which the administration considered were relevant and appropriate;
- it was not considered that a Portfolio Holder Decision was required to initiate the consultation with staff. The proposal to re-instate the position of the Chief Executive was a manifesto commitment of the current administration;
- the results of a local newspaper survey, on whether the post of Chief Executive should be re-instated or not, would not be able to be verified and so should not be relied upon;
- a Chief Executive for the Council was required to oversee major strategic projects including regenerations which would take place in Harrow;
- it was not considered that information obtained in relation to the experiences of other Councils and the Chief Executive role should be contained in the background papers as this was factual information which was available publicly;
- it was appropriate to consult on the new proposals with staff only and not residents. Residents were ultimately interested in how efficient the Council was and its performance in the services which it provided;
- if a Chief Executive was appointed, it was not expected that a person would be in the post until February 2015 at the earliest. There would therefore only be a small financial impact on the current financial year;
- there was no distinction made in the consultation with staff on whether they lived in the borough or not. It was believed that all members of staff were concerned about the Council.

In response to questions from Members of the Sub-Committee, the Lead Signatory responded as follows:

- there had been no attempt made to consult with residents on the proposals despite the administration stating that engagement with residents was important for them;
- the decision had been arrived without reference to a good evidence base.

(The Sub-Committee then adjourned from 7.12 pm until 7.29 pm for its deliberations.)

**RESOLVED:** That the challenge to the decision should be taken no further and the decision be implemented.

(Note: The meeting, having commenced at 5.30 pm, closed at 7.31 pm).

(Signed) COUNCILLOR JERRY MILES  
Chairman

**PROTOCOL FOR THE OPERATION OF THE CALL-IN SUB-COMMITTEE**

1. Call-in is the process whereby a decision of the Executive, Portfolio Holder or Officer (where the latter is taking a Key Decision) taken but not implemented, may be examined by the Overview and Scrutiny Committee prior to implementation. The Overview and Scrutiny Committee has established the Call-in Sub-Committee to carry out this role. Committee Procedure Rule 46 sets out the rules governing the call-in process.

**The Process for Call-in**

2. Six of the Members of the Council can call in a decision of the Executive which has been taken but not implemented. In relation to Executive decisions on education matters only, the number of Members required to call in a decision which has been made but not implemented shall be six Councillors or, in the alternative, six persons comprising representatives of the voting co-opted members and at least one political group on Overview and Scrutiny Committee. Only decisions relating to Executive functions, whether delegated or not, may be called in.

150 members of the public (defined as anyone registered on the electoral roll of the Borough) can call in a decision of the Executive, which has been taken but not implemented.

3. Decisions of the Executive will not be implemented for 5 clear working days following the publication of the decision and a decision can only be called in within this period (this does not apply to urgent decisions - Committee Procedure Rule 47 refers). The notice of the decision will state the date on which the decisions may be implemented if not called in.

4. Call-in must be by notification to the Monitoring Officer in writing or by fax:

i) signed by all six Members and voting co-optees requesting the call-in. A request for call-in by e-mail will require a separate e-mail from each of the six Members concerned.

ii) signed by all 150 members of the public registered on the electoral roll, and stating their names and addresses.

5. In accordance with Committee Procedure Rule 46.5, a notice seeking to invoke the call-in procedure must state at least one of the following grounds in support of the request for a call-in of the decision:-

- (a) inadequate consultation with stakeholders prior to the decision;
- (b) the absence of adequate evidence on which to base a decision;
- (c) the decision is contrary to the policy framework, or contrary to, or not wholly in accordance with the budget framework;
- (d) the action is not proportionate to the desired outcome;
- (e) a potential human rights challenge;
- (f) insufficient consideration of legal and financial advice.

**Referral to the Call-in Sub-Committee**

6. Once a notice invoking the call-in procedure has been received, the decision may not be implemented until the Chair and nominated member have considered the guidance outlined in Appendix 1 to the Committee Procedure Rules and, if required, the Call-in Sub-Committee has considered the decision. The Monitoring Officer shall in consultation with the Chair arrange a meeting of the Call-in Sub-Committee to be held within seven clear working days of the receipt of the request for call-in.

7. The Call-in Sub-Committee will consider the decision and the reasons for call-in. The Sub-Committee may invite the Executive decision-taker and a representative of those calling in the decision to provide information at the meeting.

8. The Sub-Committee may come to one of the following conclusions:-
- (i) that the challenge to the decision should be taken no further and the decision be implemented;
  - (ii) that the decision is contrary to the policy framework or contrary to or not wholly in accordance with the budget framework, and should therefore be referred to the Council. In such a case the Call-in sub-committee must set out the nature of its concerns for Council; or
  - (iii) that the matter should be referred back to the decision taker (i.e the Portfolio Holder or Executive, whichever took the decision) for reconsideration. In such a case the Call-in sub-committee must set out the nature of its concerns for the decision taker/Executive.

## Call-In of the Environment and Enterprise MTFs Implementation Plan

"I hereby give notice that I wish to call-in the decision 'Environment and Enterprise MTFs Implementation Plan' – taken by Cabinet on 19<sup>th</sup> February 2015.

This call-in relates specifically to the 'Garden Waste' element of this decision, which is a major part of the E&E department's savings programme over the MTFs. In the first year (2015/16 alone), the scheme is expected to deliver savings of £970,000 – and £1,711,000 in 2016/17. However, these savings predictions seem to be without solid foundation, and various other assumptions made regarding the decision also appear flawed and missing key information. Neither the Cabinet paper nor the separate so-called "business case" which informed Cabinet's decision address these concerns, and there appears to be a real risk that not only will the predicted savings fail to materialise, but that an initial outlay of £430,000 revenue and £990,000 capital will be spent rolling out a scheme which proves to be unsustainable. This call-in is therefore submitted on the grounds that Cabinet did not have adequate evidence on which to base its decision.

Some background; Harrow currently operates a 3-bin system for some 73,000 households – with one for recycling, one for residual waste, and the other for a combination of garden and food waste. The new proposal is to switch the garden and food bin to garden waste only, to charge £75 for a fortnightly collection of said bin, and to adopt smaller 23 litre caddies for collection of food waste. There will be concessions to this £75 charge, with pensioners receiving the service for free, and working age benefit recipients and those with disabilities receiving it for £25 and £10 respectively. The proposal bases its savings on a combination of income from charges and a reduction in disposal costs – by virtue of the fact that mixed garden and food waste costs £56 per tonne to dispose, compared with £32 for garden and £26 for food waste individually.

The costings of the decision are based on an assumption that 40% of households will take up the £75 charge, but there is no evidence of how this figure was arrived at. Indeed, when specifically asked at Cabinet why this figure was used, the portfolio holder simply reiterated that it was the predicted take-up rate. The only evidence as to how many households will take up the £75 charge comes from the Council's own consultation, which shows only 14% are prepared to pay it – with 53% solidly against. The 40% figure appears to have been used because reaching it would make the savings the department desires, rather than because of any statistical likelihood of it being met. It is also worth noting that no data is provided on the cost to the Council – and whether it would have capital or revenue implications – of disposing of tens of thousands of unwanted brown bins – a factor made more significant the lower the take-up proves to be.

There is also no evidence that the 40% figure or the savings projections take into account the concessionary rates which will be offered to certain groups of residents. The business case alleges these rates have been factored in, but provides no figures to support it. It does not appear that the Council has conducted any analysis of the predicted take-up within the concessionary groups, despite the implications it could have for the savings projections. For example, nearly 15% of Harrow's residents are pensioners, and this figure is increasing disproportionately to other age groups. Given pensioners will receive the service for free, a higher than average take up could reasonably be expected. This could potentially have a two-fold impact on the scheme's projections; as not only would there be no income from providing the service to these residents, but the costs of providing it would be exponentially higher the larger the take up is. Of course, this is just an example, but it nonetheless stands that it appears no analysis of such scenarios has been performed as part of the business case.

Another implication of charging for the garden waste collection is the possibility of increased cross-contamination of the other collections, and this too appears not to have been considered by Cabinet or the business case. This is particularly important in the light of both the poor consultation feedback, and the potential for additional costs to the Council. With only 14% of residents willing to pay for the collection, in addition to 67% stating the proposed scheme will propose difficulties for them, the potential for cross-contamination becomes higher. The financial impact of this could be significant – for example, compared with the much lower figures mentioned earlier, the per tonne charge to the Council of disposing of residual waste is £120 – more than double that of mixed garden and food waste. It is reasonable to assume that, by introducing a charge residents appear to be unwilling to pay, the Council runs the risk of more households disposing of garden waste in their residual waste bins – by hiding it under other waste, or in bags. Given the disposal cost savings (at £285,000 and £420,000 respectively) are relatively small compared with the income it is hoped the £75 charge will generate, there is a real potential that an increase in the Council's residual waste costs will undermine these savings projections – or even lead to additional cost pressures.

Finally, this proposal includes a fixed saving of £140,000 per year on collection and staffing costs. However, no decision has yet been made on which collection method will be used for the additional food caddies. The business case refers to using the existing fleet, using new vehicles, or modifying the existing fleet – yet no costings are provided for what appear to be three very different options, and there is no information provided in either the Cabinet paper or the business case as to how these three options are expected to deliver exactly the same saving. These options may also have capital cost implications, which do not appear anywhere in the documentation. Cabinet have signed-off this decision without a key operational element of it being determined, and without any information on how this decision could impact the savings proposals.

In making this decision, the evidence Cabinet had at its disposal is tenuous at best. There is absolutely no evidence as to how the 40% take up figure was reached, and key factors which either will or could impact upon the cost projections – such as the concessionary rates and the issue of cross-contamination – appear to have been subject to very little or no analysis whatsoever. And key elements of the decision, with potential cost implications, have yet to be decided upon. Cabinet could not have made a properly informed decision with the evidence it had at its disposal, hence the reason for this call-in request.”

Call-In Notice signed by:

Councillor Stephen Greek  
Councillor Barry Macleod-Cullinane  
Councillor Susan Hall  
Councillor Ameet Jogia  
Councillor Norman Stevenson  
Councillor Kantilal Rabadia  
Councillor Amir Moshenson

# CABINET

## 19 FEBRUARY 2015

Record of decisions taken at the meeting held on Thursday 19 February 2015.

**Present:**

**Chair:** \* Councillor David Perry

**Councillors:**

* Sue Anderson	* Graham Henson
* Simon Brown	* Varsha Parmar
* Margaret Davine	* Sachin Shah
* Keith Ferry	* Anne Whitehead
* Glen Hearnden	

**In attendance:**

James Bond	Minute 119
Ramji Chauhan	Minute 119
Susan Hall	Minute 119
Barry Macleod-Cullinane	Minute 119

\* Denotes Member present

### RESOLVED ITEMS

**129. Environment and Enterprise Medium Term Financial Strategy Implementation Plan**

Having considered the report in conjunction with the main budget report it was

**RESOLVED:** That

- (1) the outcome of the public consultation on the Environment and Enterprise proposals be noted;

- (2) subject to the approval of the related budgetary proposals by full Council, the Environment and Enterprise proposals summarised at paragraph 7 of the report and detailed elsewhere in the report be approved and the Corporate Director for Environment and Enterprise be authorised to take all necessary steps to implement the proposals.

**Reason for Decision:** To consider additional information regarding the key proposals within the Environment and Enterprise Medium Term Financial Strategy required to help meet the budgetary pressures facing the Council.

**Alternative Options Considered and Rejected:** As set out in the report.

**Conflict of Interest relating to the matter declared by Cabinet Member / Dispensation Granted:** None.



# REPORT FOR: **CABINET**

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<b>Date of Meeting:</b>	19 February 2015
<b>Subject:</b>	Environment and Enterprise Medium Term Financial Strategy Implementation Plan
<b>Key Decision:</b>	Yes
<b>Responsible Officer:</b>	Caroline Bruce, Corporate Director Environment and Enterprise
<b>Portfolio Holder:</b>	Councillor Varsha Parmar, Portfolio Holder for Environment, Crime & Community Safety
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All
<b>Enclosures:</b>	Appendices 1-5 Equality Impact Assessments: <ul style="list-style-type: none"><li>• Environmental Health Out of Hours Noise nuisance response service</li><li>• Shopping areas street cleaning</li><li>• Reduce Parks service to statutory minimum</li><li>• Highways Verge Grass Cutting</li><li>• Organic Garden Waste</li></ul> Appendix 6: Proposed Parks Maintenance Schedule Appendix 7: Existing parks locking schedule

## **Section 1 – Summary and Recommendations**

This report sets out the results of public consultation as well as high level implementation plans for the key Environment and Enterprise Medium Term Financial Strategy proposals.

### **Recommendations:**

Cabinet is requested to read this report in conjunction with the main budget report and:

1. note the outcome of public consultation on the Environment and Enterprise proposals; and,
2. subject to approval of the related budgetary proposals by full Council, to approve the Environment & Enterprise proposals summarised at paragraph 7 and further detailed in the report, and authorise the Corporate Director for Environment & Enterprise to take all necessary steps to implement the proposals.

### **Reason: (For recommendations)**

To provide additional information regarding the key proposals within the Environment and Enterprise Medium Term Financial Strategy which are required in order to help meet the budgetary pressures facing the Council.

## **Section 2 – Report**

### **Introductory paragraph**

1. The Environment and Enterprise (E&E) Medium Term Financial Strategy (MTFS) contains a series of savings proposals, a number of which have been consulted on due to the potential impact on residents following a Cabinet decision on 11 December 2014 to carry out a public consultation.
2. This report should be read in conjunction with main budget Cabinet report as it supplements it with further information on how the key E&E MTFS proposals will be delivered if approval is given by Cabinet for implementation and the results of the consultation.

### **Options considered**

3. As an alternative to agreeing the proposals, the Council also has the option to maintaining the current level of services; however this will impact on the proposed budget. If savings are not made from the Environment & Enterprise budget, the Council will have to consider what alternatives are available to meet its anticipated budgetary shortfall. Alternatives could

include cutting services elsewhere, use of reserves and increasing Council tax. Information on these options are included in the budget report, which is being considered at the same Cabinet meeting as this report for recommendation up to full Council.

4. Should the proposals be agreed, E&E have considered two methods of implementation – to deliver with Council staff or to contract a third party organisation. The latter option was discounted as it did not meet requirements because it would not make full use of the skills and experience of officers within the directorate.

## **Background**

5. The Environment and Enterprise (E&E) Medium Term Financial Strategy (MTFS) includes a range of proposals that continue the directorate programme of internal efficiencies through further process and structure efficiencies, and through generating additional income. The main focus of the E&E MTFS was on reducing the cost of doing business as much as possible without affecting services.
6. However given the scale of savings required, proposals that will reduce service standards or cease services that will impact residents have been unavoidable.
7. This report presents implementation plans for the five key proposals that have been subject to public consultation as part of the Take Part campaign. The proposals are:
  - 7.1. Deleting the Environmental Health out of hours noise nuisance response service;
  - 7.2. Removing dedicated 'beat sweeper' street cleaners from secondary shopping areas and removing weekend and late afternoon street cleansing from those areas;
  - 7.3. Changing the grass cutting, management and locking regimes in Council parks;
  - 7.4. Reducing the frequency of grass cutting of highway verges; and,
  - 7.5. Introducing changes to household waste collection to provide residents with a dedicated food waste collection and a separate, optional chargeable garden waste collection.
8. For each proposal, the following information is presented below:
  - 8.1. A summary of each proposal;
  - 8.2. A delivery plan setting out key actions and timeframes;
  - 8.3. Analysis from public consultation; and,
  - 8.4. An equality impact update.

## **Consultation and implementation overview**

9. High level plans, with indicative dates, are presented below that identify the actions that will be taken to implement the proposals if they are agreed by Cabinet.

10. Detailed plans are being drafted and will be included in the Project Initiation Documents for the proposals together with the organisational arrangements for delivery.
11. All proposals implemented will have a stabilisation review period designed to monitor implementation, ensure any technical issues are identified and rectified, and customer and staff impacts are monitored.
12. Members of staff were advised of the proposals that had staff impacts prior to the commencement of the Take Part campaign and Cabinet reports proposing savings, and also took part in the Take Part Employee consultation. In addition, Trade Union colleagues have been given briefings prior to each Cabinet meeting agenda publication.
13. The Council consulted on its overall budget proposals, including E&E services, as part of the Take Part consultation. The results of this consultation was fed back to Cabinet in December 2014 and can be viewed at <http://www.harrow.gov.uk/www2/documents/s118033/Appendix%206%20-%20Take%20Part%20feedback%20presentation.pdf>
14. Following the initial Take Part consultation, further consultation on the specific E&E proposals was conducted by way of online surveys undertaken between 16 December 2014 and 29 January 2015. The survey was publicised through the Community Champion network, as well as posting it on the Harrow website, and through community groups, community events and libraries.
15. Printed copies of the survey were available at libraries and also posted to the Harrow Federation of Tenants, Residents and Leaseholders (HFTRL). This was also supplemented by formal and informal presentations with Park User Groups. All surveys completed via printed copy were then collated together with all online feedback.
16. The survey was designed to be easy to complete and had a mixture of questions for a choice of answers to select and open questions for customers to provide more detailed feedback, where appropriate. There were a total of 801 surveys completed and returned.
17. Alongside the surveys, further comments and correspondence have been received and have been incorporated into the overall assessment of consultation feedback and Equality Impact Assessments. Correspondence has been acknowledged and residents with general enquiries were encouraged to complete the survey.
18. As a result of the consultation, E&E have reassessed the proposals based on the impact for residents. In general, the consultation reflects that customers are understanding of the proposals. There are changes, detailed below, that have been made to the proposals as a result of the feedback and the results underline the need for a comprehensive communications campaign.

19. The consultation also demonstrates the drive from E&E to increase community involvement in the planning and delivery of services. E&E will continue to work with community groups to create conditions that allow local people to make a difference to improve their area through increased involvement and decision making. The Community Champion scheme is also being developed to increase champions influencing and involvement in services.

## **E&E\_23 Environmental Health Out of Hours Noise nuisance response service**

20. The Environmental Health Out of Hours noise nuisance responsive service is the means in which residents can refer a wide range of noise complaints witnessed out of working hours to the Council. Typical enquiries include noise from anti-social behaviour, barking dogs, domestic and car security alarms, noise from pubs, clubs and other entertainment venues. Typically, 600 complaints are received a year.

21. The current service operates on Friday and Saturday. Officers investigate complaints raised and also carry out proactive visits to licensed premises.

22. This proposal is to stop delivering the out of hours noise service. The team will, however, continue to investigate complaints and carry out planned proactive visits during working hours. If the proposal is adopted, the remaining services provision will continue to meet the statutory obligations that the Council is required to meet.

### ***Delivery plan***

23. Key activities for the implementation of this proposal are updating service standards and informing customers thereof, and a service review after six months.

TABLE 1: Out of Hours Implementation Plan

<b>Action title</b>	<b>Action detail</b>	<b>Timeframe</b>
Design and presentation	Creation of proposal Presentation Cabinet	June 2014 to December 2014
Public Consultation	Carry out public consultation via online surveys, Harrow Federation of Tenants, Residents and Leaseholds and community groups Assess customer feedback and update proposals	16 December 2014 to 29 January 2015
Staff consultation	Inform staff of changes to service Inform Trade Unions of changes and impacts to service	March 2015
Inform customers and partner agencies	Publish service change through means such as Harrow Council website, Community Champions and community groups Advise police and other agencies of service changes	March 2015
Go live	Cease the service provision to customers	April 2015
Post implementation review	Review the impact of the deletion of service through analysis of customer service request, complaints and feedback through engagement exercises	October 2015

### ***Public consultation analysis***

24. 79% of respondents had not used the out of hours noise service while 23% thought that the deletion of the service would have a detrimental affect on their quality of life. Over 60% of respondents confirmed that they were aware of how to raise a noise complaint to the Council.
25. As a result of the feedback, communications to residents will also now include messages about how to raise noise complaints to the Council after the deletion of the service. This will reinforce the message to those that are already aware how to and inform those who are not. This will ensure that customers can still raise issues for the Council to address during working hours.
26. The communications will also provide the contact details for the Civic Centre out of hours security service to allow residents to still log issues out of hours if they wish.

### ***Equality impact update***

27. The Equalities Impact Assessment (EqIA) produced for the proposal indicated that while the out of hours service has been in place, there has been no evidence that indicates that a particular section of the community uses the services more than another and that no particular type event is complained about compared to another.
28. The EqIA has been reviewed and updated following the results of public consultation and no further customer impacts have been identified.

### **E&E\_25 Shopping areas street cleaning (beat sweepers)**

29. The street cleansing service covers both residential roads and shopping areas. The Council deploys staff to the Harrow Town Centre and the secondary shopping areas to have a permanent presence and carry out cleaning activities throughout the day.
30. This proposal removes dedicated “beat sweeper” street cleaners who are located in the borough’s secondary shopping areas and also removes weekend and late afternoon street cleansing of the areas with effect from 01 April 2015. Harrow Town Centre will, however, remain unaffected by the proposal.
31. There are nine secondary shopping areas outside of the Town Centre that will be affected – Burnt Oak, Harrow Weald, Hatch End, North Harrow, Pinner, Rayners Lane, Stanmore, South Harrow and Wealdstone. There will, however, be mobile cleansing teams that visit the areas each day to empty litter bins and carry out street cleaning activities but to a lower frequency than is currently in place.
32. The national street cleaning standards as set out the in the Code of Practice on Litter and Refuse will continue to be followed in the new schedules. The new street cleansing frequency will continue to keep

secondary shopping areas clear of litter and refuse as far as is considered reasonable.

### ***Delivery plan***

33. Key activities for the implementation of this proposal are amendments to work schedules used by operational teams, updating staff structures, updating services standards and informing customers thereof, and a stabilisation review period.

TABLE 2: Beat Sweepers Implementation Plan

<b>Action title</b>	<b>Action detail</b>	<b>Timeframe</b>
Design, consultation and presentation	Creation of proposal Presentation to Cabinet Consultation and engagement with Trade Unions and staff	June 2014 to December 2014
Public Consultation	Carry out public consultation via online surveys, Harrow Federation of Tenants, Residents and Leaseholds and community groups Assess customer feedback and update proposals	16 December 2014 to 29 January 2015
Staff consultation	Inform staff of changes and impacts to service Inform Trade Unions of changes and impacts to service Update SAP organisational structures with changes	March 2015
Work schedules	Update Collective system to reflect new work schedules	March 2015
Service standards	Inform public of the change in service standards Update website with service standard changes	March 2015 to April 2015
Go live and stabilisation	Commence new maintenance regime and carry out weekly checks and identify and resolve any issues arising	April 2015
Trader engagement	Work with traders associations and business improvement districts to prompt businesses self service	May 2015 to October 2015
Service review	Six month review to assess service changes	October 2015

### ***Public consultation analysis***

34. Just under half (49%) of respondents rated current cleaning standards as excellent or good, with 15% rating it poor. Of those who rated it poor, the majority cited the presence of general littering and flytipping as the main reasons for their views.

35. When asked whether high frequency cleaning in our shopping areas is key to the economic vitality of Harrow, while three quarters of respondents answered yes, nine out of ten believed that shopkeepers should take more responsibility for cleaning areas outside their shops.

36. In light of the customer feedback in relation to shopkeepers taking more responsibility for cleaning outside their shops, greater emphasis will be placed on working with traders associations and the Business Improvement Districts to raise awareness and engage with businesses to carry out cleaning outside their shop fronts. This has been added to the implementation plan for action.

### ***Equality impact update***

37. The initial EqlA produced to accompany the proposal indicated that the reduced cleansing frequency in shopping areas may affect wheelchairs users and/or people with mobility and visual impairments due to increased litter. This impact is mitigated by mobile teams carrying out daily cleaning and responding to service requests regarding excessive littering within 24 hours.
38. The EqlA has been reviewed and updated following the results of public consultation and there has been no further adverse impact identified for customers. Customer satisfaction and service issues will be monitored through the use of the Collective management system used by the department.
39. There will be a reduction in posts currently filled by agency workers so there will be no redundancy of directly employed staff. The amount of work being done will be reduced proportionately so there should be no impact on remaining staff. Socio-economic and health impacts will be monitored using the Action Plans in the EqlAs.
40. There is also a wider impact on staff across the Council as the deletion of full time equivalent posts reduces the redeployment opportunities to displaced staff as the organisation progress its change programme. E&E will work with the corporate Organisational Development team in mitigating this impact.

### **E&E\_26 Reduce Parks services that the Council are responsible for to statutory minimum**

41. The parks maintenance service carried out to the parks that the Council is responsible for provides grass cutting for parks and open spaces and a range of horticultural services, including sports pitch maintenance, planting and bedding maintenance, weed control and a locking and unlocking service for key parks.
42. This proposal seeks to convert some of the parks into wildlife open spaces. This involves reducing grass cutting to only that which is needed for health and safety reasons, reducing pruning and removing some shrub, rose and flower beds. The proposal also removes the parks locking service for the 30% of parks that are currently locked, and also a reduction in management.
43. As set out in the Parks and Opens Spaces Act, while Local Authorities do not have a statutory obligation to provide public parks and open spaces, where they do provide them they are required under statute to hold and administer the open space in trust with a view to public enjoyment and maintain and keep the open space in a good and decent state. The changes contained within this proposal bring the service in line with what is considered to be the minimum standard to meet our statutory obligation.



## ***Delivery plan***

44. Key activities for the implementation of this proposal are amendments to work schedules used by operational teams, updating staff structures, updating services standards and informing customers thereof, and a stabilisation review period. The stabilisation review period will include an assessment of levels of litter in bins to ensure that they are not overflowing following a reduction in emptying frequencies.

TABLE 3: Parks Maintenance Implementation Plan

<b>Action title</b>	<b>Action detail</b>	<b>Timeframe</b>
Design, consultation and presentation	Creation of proposal Presentation to Cabinet Consultation and engagement with Trade Unions and staff	June 2014 to December 2014
Public Consultation	Carry out public consultation via online surveys, Harrow Federation of Tenants, Residents and Leaseholds and community groups Assess customer feedback and update proposals	16 December 2014 to 29 January 2015
Staff consultation	Inform staff of changes and impacts to service Inform Trade Unions of changes and impacts to service Notify staff of cessation of secondment places Update SAP organisational structures with changes	March 2015
Work schedules	Update Collective system to reflect new work schedules	March 2015
Service standards	Inform public of the change in service standards Update website with service standard changes	March 2015 to April 2015
Go live and stabilisation	Commence new maintenance regime and carry out weekly checks and identify and resolve any issues arising	April 2015 to May 2015
Service review	Six month review to assess service changes	October 2015

## ***Public consultation analysis***

45. Almost three quarters (71%) of respondents indicated that they visited parks at least once a month, which reflects the popularity of parks and open spaces across the borough. The most popular reasons for using parks were for the green area, walking and relaxing. Pinner Memorial Park had the most mentions in the survey.

46. Encouragingly, almost half of respondents (41%) said they would volunteer to help support their local park and around 1 in 6 said they would join a Friends /Park user group. This bodes well for the pledge to create a User Group for each park.

47. This will be approached by E&E in a phased approach by identifying those parks where there is already significant interest in creating user groups and working with them to find the best model that meets their needs.

48. E&E have developed a series of template documents that acknowledge the sliding scale of responsibilities that user groups can have. This ranges from working with officers, carrying out some amenity services or full management of parks.

49. When asked to rate current standards within our parks, 65% of respondents said they were good or very good. Just fewer than 80% of respondents thought it was important that Harrow has parks with Green Flag status. The results indicate that standards, in particular Green Flag status, are important to residents. Applications for Green Flag status need to be made every year and the Council has already submitted applications to be assessed for the 2015 award in the existing five parks with the accreditation (Kenton Recreation Ground, Canons Park, Roxeth Recreation Ground, Harrow Recreation Ground and Pinner Memorial Park). The assessments are anticipated to take place May 2015.
50. In terms of park locking, 69% said that they would not be directly affected if the nominated parks were not locked, with the remaining population stating that they would be affected. Illegal activity, fear of crime and disturbance were the main issues raised by those who replied that they would be affected by stopping the service. These issues will continue to be discussed with the Police and other key partners in order to mitigate concerns raised.
51. As a result of the public consultation, the proposal for parks maintenance has been amended to incorporate aspirations to achieve Green Flag status in key parks. While the existing parks will no longer have a dedicated member of staff based permanently on site (which helps to achieve some of the criteria required for the award), the mobile operational teams will undertake maintenance of parks that aspire to Green Flag status. Although we are looking to increase volunteer involvement within our portfolio of parks and open spaces, the revised maintenance regimes, however, may mean that the assessment criteria are not met even with the assistance of volunteer groups.
52. The list of proposed standards for parks can be found as an Appendix to this report. Canons Park will continue to receive Lottery funding to achieve standards.

### ***Equality impact update***

53. The EqIA produced for the proposal indicated that the reduced cleansing frequency and changes in the grass cutting regime may affect older people and those with mobility or visibility impairments. Long grass can hide litter and obstructions that could contribute to slip/trip hazards and make walking away from the main paths more hazardous for the elderly.
54. The EqIA has been reviewed and updated following the results of public consultation and the impacts identified can be further mitigated by the potential attainment of Green Flag status in some parks.
55. There will be a reduction in posts currently filled by agency workers so there will be no redundancy of directly employed staff. The amount of work being done will be reduced proportionately so there should be no impact on remaining staff. Socio-economic and health impacts will be monitored using the Action Plans in the EqIAs.

56. There is also a wider impact on staff across the Council as the deletion of full time equivalent posts reduces the redeployment opportunities to displaced staff as the organisation progress its change programme. E&E will work with the corporate Organisational Development team in mitigating this impact.

## **E&E\_27 Highways Verge Grass Cutting**

57. The Council currently cuts highway grass verges on a three week cycle from March to November, with grass clippings being left distributed evenly over the verge to compost down back into the soil.

58. This proposal will reduce the cutting frequency from three weeks to a six week cycle to all verges across the borough, with all grass clippings remaining to be left upon the verge to compost.

### ***Delivery plan***

59. Key activities for the implementation of this proposal are amendments to work schedules used by operational teams, updating staff structures, updating services standards and informing customers thereof, and a stabilisation review period.

TABLE 4: Highway Verge Implementation Plan

<b>Action title</b>	<b>Action detail</b>	<b>Timeframe</b>
Design, consultation and presentation	Creation of proposal Presentation to Cabinet Consultation and engagement with Trade Unions and staff	June 2014 to December 2014
Public Consultation	Carry out public consultation via online surveys, Harrow Federation of Tenants, Residents and Leaseholds and community groups Assess customer feedback and update proposals	16 December 2014 to 29 January 2015
Staff consultation	Inform staff of changes and impacts to service Inform Trade Unions of changes and impacts to service Update SAP organisational structures with changes	March 2015
Work schedules	Update Collective system to reflect new work schedules	March 2015
Service standards	Inform public of the change in service standards Update website with service standard changes	March 2015 – April 2015
Go live and stabilisation	Commence new maintenance regime and carry out weekly checks and identify and resolve any issues arising	April 2015
Communications	Communications campaign to promote residents maintaining grass verges outside their properties	May to October 2015
Service review	Six month review to assess service changes	October 2015

### ***Public consultation analysis***

60. Of the customers that responded to the consultation, 43% had a grass verge outside their house and just under half indicated that they would be prepared to cut the verge. When asked about impact on quality of life from this proposal, 42% said it would not impact their quality of life, compared to 39% saying it would.

61. Respondents were asked their views on the introduction of different cutting cycles for different locations across the borough. Half of respondents believed that the Council should introduce differential cutting regimes with respondents believing highway safety and areas of high footfall should be given priority. It is not, however, considered appropriate to implement this suggestion as it would lead to differential treatment across the borough. As such, the proposal to maintain a standard cutting regime will be retained as proposed. The reduction in frequency will be mitigated by supporting of residents in maintaining the verges at the front of their properties.

### ***Equality impact update***

62. The EqIA produced for the proposal indicated that this proposal should not disproportionately affect one or more group.

63. The EqIA has been reviewed and updated following the public consultation and no additional equalities impact has been identified. If different cutting regimes were introduced across the borough, then a consequential impact will be introduced that may have a disproportionate affect on customers.

64. There will be a reduction in posts currently filled by agency workers so there will be no redundancy of directly employed staff. The amount of work being done will be reduced proportionately so there should be no impact on remaining staff. Socio-economic and health impacts will be monitored using the Action Plans in the EqIAs.

65. There is also a wider impact on staff across the Council as the deletion of full time equivalent posts reduces the redeployment opportunities to displaced staff as the organisation progress its change programme. E&E will work with the Council Organisational Development team in mitigating this impact.

### **E&E\_34 Garden Waste**

66. The Council currently provides three wheeled bin household waste collections to Harrow Residents that covers landfill, recycling, mixed organic and clinical waste types. The mixed organic waste service is in place for residents to dispose of garden and food waste in a single bin and collected on a weekly basis.

67. This proposal replaces the mixed waste collection scheme with separate collections for food waste and garden waste.

68. Under the proposal, residents will be provided with a small food waste bin along with a smaller caddy to use to transfer waste to the outside bin. This service will be collected on a weekly basis and part of the statutory service and will not result in charges for residents.

69. Alongside the new food waste service, a new opt in, chargeable garden waste scheme will be introduced for residents who wish to continue to dispose of garden waste through household collections from the Council.

Residents who sign up for the scheme will retain their current brown bin and have it collected once every two weeks. Residents who do not wish to sign up for the scheme will be able to take their garden waste to the Waste, Reuse and Recycle Centre at Forward Drive, Wealdstone or via home composting.

70. Whilst the Council Tax bill includes a charge for the collection and disposal of domestic waste, Councils are not obliged to cover the cost of collecting garden waste. Some Councils may not have the necessary resources to cover this cost, which is why charges are made for the service.

71. When setting the proposed charges, a benchmarking assessment of other Council charges, in particular across London, was undertaken. The table below sets out the standard charges for schemes offered across London:

TABLE 5: London Borough annual garden waste charges

London Borough	Annual chargeable fee:
Brent	£40
Bromley	£60
Ealing	£40
Havering	£35
Kingston Council	£75
Lambeth	£35
Merton	£65
Richmond Upon Thames	£60

72. The proposed charge is a fee of £75 per year, with a means tested concessionary scheme under consideration. The Council proposes to give an introductory fee of £75 to cover 18 months between October 2015 and 31 March 2017.

### ***Delivery plan***

73. If the proposal is approved by Cabinet, it will be delivered via a project with five workstreams:

73.1. **Work scheduling.** New work schedules will be created for the weekly food waste collection and the fortnightly garden waste collections;

73.2. **Technology.** This includes activities around invoice generation, systems integrations between customer contact, financial and waste management systems. This will also include customer account management and methods for customers to raise services requests about the food and garden waste services;

73.3. **Equipment.** This will focus on the vehicle and bin requirements for both food and garden waste services, and the disposal arrangements for both waste types;

73.4. **Business Process Reengineering.** This will include terms and conditions and payment mechanisms for the garden waste service, enforcement and compliance processes and performance management arrangements; and,

73.5. **Communications.** This will include communications on project objectives and progress to all concerned stakeholders, together with a Behaviour Change Campaign that is aimed at delivering longer term changes in support of the organic waste changes. Examples of communication methods that will be considered are:

TABLE 6: Communication methods

Internal communications (Staff and Councillors)	External Communications (Residents, Community Groups and Suppliers)
Intranet Team brief Members' briefings Newsletters Training programmes & information drops Vehicles – Agripa panels Committee papers and reports Noticeboards Reception areas	Website Electronic media, texts, emails, Twitter, FaceBook Local media, including press, radio and advertising Letter and leaflet drops Roadshows Community events Presentations and attendance at meetings Residents' associations & Community Groups Vehicles – Agripa panels Permanent or temporary displays, e.g. in public buildings Waste, Reuse and Recycle Centre West London Waste Authority sites Community Champions Public Noticeboards Council Tax mailing Focus groups

74. The governance of the project will follow a Prince2 project management framework. A Project Board will be created with responsibility for the overall direction and management of the project and will meet at least once a month to monitor progress prior and provide authorisation to proceed throughout the stages of the project.

75. The Project Board is responsible for ensuring that the project remains on course to deliver the desired outcomes to the required quality. The roles and responsibilities of members of the Project Board will be defined in the Project Initiation Document (PID) and the roles will be carried out by officers from across the departments affected by the changes.

76. A detailed project plan will also be included in the PID but the initial high level plan is as follows:

TABLE 7: Garden Waste Implementation Plan

Action title	Timeframe
Design, consultation and presentation	June 2014 to December 2014
Public Consultation	16 December 2014 to 29 January 2015

Action title	Timeframe
Staff consultation	March 2015 to October 2015
Work scheduling	March 2015 – August 2015
Technology	March 2015 – May 2015
Equipment	March 2015 – April 2015
Business process reengineering	March 2015 – August 2015
Communications	January 2015 – December 2015

77. The table below shows the charges set by the West London Waste Authority for 2015 – 2016. These are the charges made to the constituent boroughs per tonne of waste they deposit. These are known as Pay as you throw charges and act to incentivise boroughs to minimise the amount of waste collected. Food waste and garden waste processed separately, rather than mixed or included in the residual waste, attract a lower processing cost as illustrated in the table.

TABLE 8: 2015 – 2016 waste charges

Item	2015/16 charge per tonne
Residual Waste (delivered)	£120.18
Food	£25.95
Green	£32.41
Mixed food and green	£56.34

### **Public consultation analysis**

78. Just over 80% of respondents use the organic bin to dispose of their food and garden waste. When asked for the most common items that they put in the bin, food waste, weeds and grass were the most popular answers.

79. When asked if difficulties would be experienced if the mixed food and garden waste collection was stopped, 67% responded yes and 20% said no with the remaining 11% saying that they did not know.

80. Residents were also asked if they would take up the new chargeable service, over half (53%) said no, 31% were undecided and 14% replied yes. When asked why they would not subscribe to the garden waste service, the cost and not generating enough garden waste for a separate bin were the most frequent responses. Concerns were also raised about waste being left uncollected in the street and fly tipping if the scheme was adopted.

81. When asked which groups should be eligible for concessionary rates, residents on pension credit and income support were identified as those groups respondents felt should be eligible. This feedback supports consideration of a concessionary scheme.

82. The results of the consultation underline the need for a comprehensive communications campaign relating to the service, careful consideration of a concessionary charging scheme and scalability of service provision to

meet an uncertain level of demand. All of these factors will be considered during the development and implementation of the scheme.

### ***Equality impact update***

83. The EqlA produced for the proposal indicated that there was a potential disproportionate impact on elderly residents and residents with disabilities as those groups may have difficulty in accessing the Council Waste, Reuse and Recycle Centre to dispose garden waste as an alternative to the scheme.
84. The EqlA has been reviewed following the results of public consultation with the original impacts restated and a potential impact on residents within the pregnancy and maternity group. The introduction of a concessionary scheme is the predominant mitigation for the affected groups.
85. There will be a reduction in posts currently filled by agency workers so there will be no redundancy of directly employed staff. The amount of work being done will be reduced proportionately so there should be no impact on remaining staff. Socio-economic and health impacts will be monitored using the Action Plans in the EqlAs.
86. There is also a wider impact on staff across the Council as the deletion of full time equivalent posts reduces the redeployment opportunities to displaced staff as the organisation progress its change programme. E&E will work with the corporate Organisational Development team in mitigating this impact.

### **Performance and Risk Management**

87. The monitoring of implementation of the MTFs will form part of the directorate performance management process, which will measure the progress in delivering the proposals and the impact of the changes.
88. The proposals detailed in this report will impact negatively on the environmental appearance of the borough as we minimise standards. Whilst mitigations will be in place as far as is possible (such as fixed penalty notices and engagement with traders to reduce waste from retail centres), it is inevitable that a reduction in standards will be seen.
89. The proposals contained within the MTFs and the methods of implementation have both been designed to minimise the environmental impact of Council operations upon the local environment
90. Risk registers have been created for each proposal, which will be expanded in the Project Initiation Documents if Cabinet gives approval to proceed.
91. The risk registers document the risks for each proposal, assign owners and the current and future actions in place to control the risks. The Council corporate risk management procedure will be used to rate risks.



## **Legal Implications**

92. Where not otherwise prescribed in legislation, local authorities have discretion as to how they perform their statutory duties and the proposals are consistent with performance of the council's legal obligations in respect of the affected services. In particular, The Controlled Waste (England and Wales) Regulations 2012 provide that local authorities can levy a reasonable charge for the collection of green waste.
93. When making policy decisions, the Council must take account of all relevant considerations. These include the duty to give due regard to the public sector equality duties, as set out in the Equalities section below, and in particular any potential differential and/or adverse impact. When consulting on proposed service cuts or closure of services, it will not be unusual for the majority of respondents to be against the proposals. These views must be taken into account, however, this is not a matter of a simple headcount of those in favour and those against proposals. Even in situations where the majority of respondents are opposed to the proposals, the Council may decide to implement this if there are good reasons for doing so. The Council must have regard to and weigh up all relevant factors, including financial resources, alternative options, equality impact and consultation responses, which in the context of the function being exercised, it is proper and reasonable for the Council to consider.

## **Financial Implications**

94. The five saving proposals detailed in this report, if approved, would realise a total saving of £3.29M which could be used to contribute towards the Council's 15/16 MTFS. The financial details of these proposals have been included in the main 15/16 Budget Report which is being presented to cabinet with this report.
95. Any additional financial requirements to implement proposals beyond existing E&E budgets have been included in the cost models for each proposal. If no additional implementation costs are stated, then E&E will use existing budgets to deliver the proposals.

## **Equalities implications / Public Sector Equality Duty**

96. Section 149 of the Equality Act 2010 requires that public bodies, in exercising their functions, have due regard to the need to (1) eliminate discrimination, harassment, victimisation and other unlawful conduct under the Act, (2) advance equality of opportunity and (3) foster good relations between persons who share a protected characteristic and persons who do not share it.

97. Equalities Impact Assessments have been carried out and have identified impacts as referenced above. The EqIAs are attached with this report.

### Council Priorities

98. The Council's vision:

98.1. **Working Together to Make a Difference for Harrow**

99. The Council Priorities are as follows:

- Making a difference for the vulnerable;
- Making a difference for communities;
- Making a difference for local businesses; and,
- Making a difference for families.

100. The setting of the E&E MTFs was priority lead so that resources within the directorate are aligned with Council priorities and statutory responsibilities.

### Section 3 - Statutory Officer Clearance

Name: Jessie Man	<input checked="" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 09 February 2015		
Name: Matthew Adams	<input checked="" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 23 January 2015		

<b>Ward Councillors notified:</b>	<b>NO.</b>
<b>EqIA carried out:</b>	<b>YES</b>
<b>EqIA cleared by:</b>	Equality Impact Assessment Quality Assurance Group

## **Section 4 - Contact Details and Background Papers**

**Contact:** Andrew Smith, Strategic Commissioner, 02084247698,  
[andrew.smith@harrow.gov.uk](mailto:andrew.smith@harrow.gov.uk)

### **Background Papers:**

Appendices 1-5 Equality Impact Assessments:

- Environmental Health Out of Hours Noise nuisance response service
- Shopping areas street cleaning
- Reduce Parks service to statutory minimum
- Highways Verge Grass Cutting
- Organic Garden Waste

Appendix 6: Proposed Parks Maintenance Schedule

Appendix 7: Existing parks locking schedule

<b>Call-In Waived by the Chairman of Overview and Scrutiny Committee</b>	<b>NOT APPLICABLE</b>  <i>[Call-in applies]</i>
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## Appendix 1: Environmental Health Out of Hours Noise nuisance response service EqIA

### Equality Impact Assessment (EqIA) Template

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 assessment. It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:	Tick ✓	Type of Decision:	Tick ✓
Transformation		Cabinet	✓
Capital		Portfolio Holder	
Service Plan		Corporate Strategic Board	
Other		Other	
<b>Title of Project:</b>			
Environmental Health out of hours noise nuisance response service.			
<b>Directorate / Service responsible:</b>			
E&E / Environmental Health (Domestic)			
<b>Name and job title of lead officer:</b>			
Alex Hauck			
<b>Name &amp; contact details of the other persons involved in the assessment:</b>			
David Corby			
<b>Date of assessment:</b>			
12/01/2015			
<b>Stage 1: Overview</b>			
<b>1. What are you trying to do?</b> (Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)		The proposal is to remove the out of hours noise team service. The team will continue to carry out planned proactive visits for the day time teams, such as licensing visits and planning checks  Deletion of the Environmental Health Out of Hours Noise service, to be implemented from 1 <sup>st</sup> October 2014. Saving £50k.	
<b>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</b>		Residents / Service Users	X
		Partners	X
		Staff	X
		Age	
		Stakeholders	
		Disability	

	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity
	Sexual Orientation	Other	
3. Is the responsibility shared with another directorate, authority or organisation? No.			
<b>Stage 2: Evidence / Data Collation</b>			
4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. 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; complaints etc. Where possible include data on the nine Protected Characteristics. <b>(Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)</b>			
Age (including carers of young/older people)	No data collected.	Unlike to have an adverse disproportionate effect.	
Disability (including carers of disabled people)	No data collected.	Unlike to have an adverse disproportionate effect.	
Gender Reassignment	No data collected.	Unlike to have an adverse disproportionate effect.	
Marriage / Civil Partnership	No data collected.	Unlike to have an adverse disproportionate effect.	
Pregnancy and Maternity	No data collected.	Unlike to have an adverse disproportionate effect.	
Race	No data collected.	Unlike to have an adverse disproportionate effect.	
Religion and Belief	No data collected.	Unlike to have an adverse disproportionate effect.	
Sex / Gender	No data collected.	Unlike to have an adverse disproportionate effect.	
Sexual Orientation	No data collected.	Unlike to have an adverse disproportionate effect.	

Socio Economic	No data collected. Unlike to have an adverse disproportionate effect.			
<b>5. What consultation have you undertaken on your proposals?</b>				
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? (This may include further consultation with the affected groups, revising your proposals).	
Community Champions Housing Tenants  See Appendix 1	An online survey supported by self-completion, plus hard copy questionnaires available at local libraries. The Community Engagement team publicised the web-link through the Community Champion network and key community organisations as well as publicising it on the Harrow website, events, and libraries. A sample of 520 has been achieved to date  The survey is around 15 minutes in length, comprised of a mix of pre-coded and open ended questions.	25% of respondents thought that the proposals will have a detrimental effect on their quality of life. Cross tab analysis on age – disability and ethnicity indicated an even distribution across all three protected characteristics.  Reasons of effect primarily relate to generalised environmental noise with minimal direct impact.	Data indicates that no protected groups are disproportionately effected. Therefore no further action is programmed	

**6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?**

None N/A

List the Title of reports / documents and websites here.

### Stage 3: Assessing Potential Disproportionate Impact

7. 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									
No	X	X	X	X	X	X	X	X	X

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

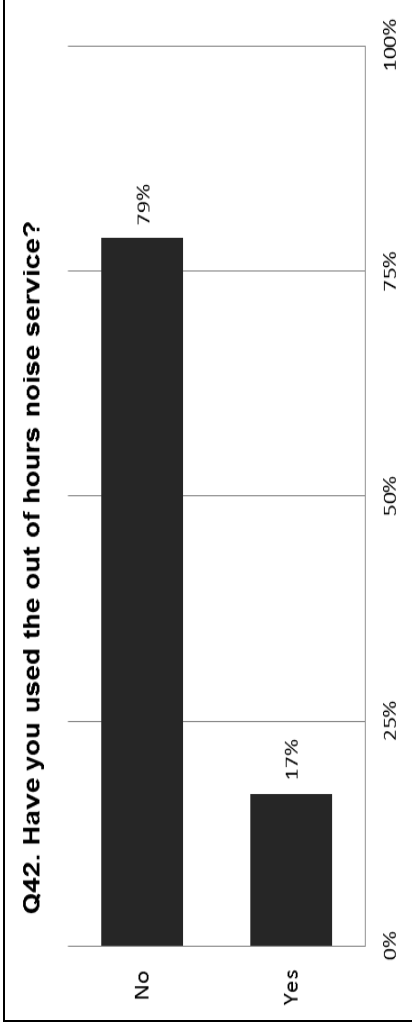
**Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA  
It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

**NO** - If you have ticked 'No' to all of the above, then go to **Stage 6**

Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7



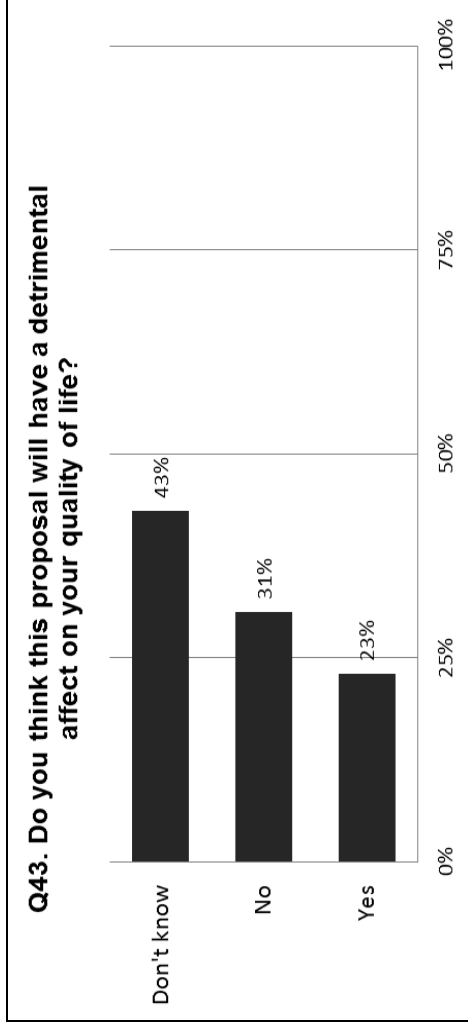
Just under 1 out of 5 respondents (17%) had used the out of hours noise service.



**8.** What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?

**41** Include this evidence, including any data, statistics, titles of documents and website links here)

Just under a quarter of respondents (23%) thought this proposal would have a detrimental affect on their quality of life. 43% said they did not know, and just under a third (31%) said it would not have a detrimental affect.



**9.** 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? (This may include further consultation with the affected groups, revising your proposals).

### Stage 5: Assessing Impact and Analysis

**10.** What does your evidence 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	Adverse	Positive	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.  <b>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9</b>	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 7)
Age (including carers of young/older people)	✓	✓		
Disability (including carers of disabled people)				
Gender Reassignment				
Marriage and Civil Partnership				
Pregnancy and Maternity				
Race				
Religion or Belief				
Sex				
Sexual orientation				

<b>11. Cumulative Impact</b> – Considering what else is happening within the Council and	Yes	No	<b>X</b>
--	-----	----	----------

<p>Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?</p>						
<p>If yes, which Protected Characteristics could be affected and what is the potential impact?  <b>11a. Any Other Impact</b> – 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?</p>	Yes		No			<b>X</b>
<p>If yes, what is the potential impact and how likely is to happen?</p>						
<p><b>12.</b> Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged? <b>(Please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act) available on Harrow HUB/Equalities and Diversity/Policies and Legislation</b></p>						
<p>Yes</p>						
<p>No</p>	X	X	X	X	X	X
<p><b>43</b> 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)</p> <p>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.</p> <ul style="list-style-type: none"> <li>▪ If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. <b>(select outcome 4)</b></li> <li>▪ If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. <b>(select outcome 4)</b></li> </ul>						

### Stage 6: Decision

**13.** 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: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.	X
<b>Outcome 2</b> – Minor adjustments to remove / mitigate adverse impact or advance 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 7</i>	
<b>Outcome 3</b> – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. 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. <b>(Explain this in 13a 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>13a.</b> If your EqIA is assessed as <b>outcome 3 or you have ticked 'yes' in Q12</b> , explain your justification with full reasoning to continue with your proposals.	

44

### Stage 7: Improvement Action Plan

**14.** List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
N/A					

### Stage 8 - Monitoring

The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.

**15.** How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? *(Also Include in Improvement*

<i>Action Plan at Stage 7</i>	
<b>16.</b> How will the results of any monitoring be analysed, reported and publicised? (A/so Include in Improvement Action Plan at Stage 7)	
<b>17.</b> Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	

<b>Stage 9: Public Sector Equality Duty</b>		
<b>18.</b> How do your proposals contribute towards 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.  (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)		
Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups

**Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)**  
**ie completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.**

<b>45.</b> Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	Alex Hauck	Signed: (Chair of DETG)	Hanif Islam
Signed: (Lead officer completing EqIA)	16/01/2015	Date:	
Date EqIA presented at the EqIA Quality Assurance Group	28/01/2015	Signature of ETG Chair	PP Hanif Islam



# Appendix 1

## Consultees

Afghan Association of London (Harrow)	Jaago Punjabi Women's Group	Pinner Albion FC
Association of Senior Muslim Citizens	Pinner Association	St Josephs Youth FC
Gujarati Arya Association	Wealdstone Active Community	Stanmore Manor FC
Harrow Bengalee Association	ADHD and Autism Support Harrow	Three Wishes Exiles
Harrow Iranian Community Association (HICA)	Mind in Harrow	Venceremos FC
Harrow Tamil Association	National Osteoporosis Society Middlesex Group	APB FC
Indian Association of Harrow	Rethink: Harrow Support Group	Lankians CC
Nepalese British Community UK	Friends of Bentley Priory Nature Reserve	Pinner Challengers CC
Pakistan Society of Harrow	Friends of Canons Park	Pinner Cricket Club
Russian Immigrants Association	Friends of West Harrow Park	South Harrow CC
The Harrow African Caribbean Association (HACAS)	Harrow Youth Parliament	Tamil Union CC
UK Asian Women's Conference (North London)	Capable Communities Ltd.	West Harrow CC
Harrow in Business (HiB)	The Wish Centre	Yarl CC
Canons Community Association	The Stanmore Society	Youth Wing CC
Harrow Association of Disabled People	Bessborough Cricket Club	Culver Bowls Club
Harrow in Leaf	Harrow Rugby Football Club	Harrow Weald Bowls Club
Middlesex Association for the Blind	Harrow St. Mary's Youth Football Club	Pinner Bowls Club
Harrow Heritage Trust	Pinner Cricket Club	Stanmore Bowls Club
North West London Lesbian & Gay Group (NWLLG)	Pinnstars Football Club	Pinner & Grammarians Rugby Football Club
Harrow Civic Residents' Association (HCRA)	Harrow Mencap	
Hatch End Association	Harrow Over 50 club	
HFTRA (Harrow Federation of Tenants' & Residents' Associations)	Harrow Community Transport	
Harrow Association of Voluntary Service	Harrow Centre for Volunteering	
Voluntary Action Harrow	Harrow Volunteer Centre	
Angolan Civic Communities Alliance (ACCA)	Harrow Women's Centre	
Harrow	Headstone Manor Youth Football Club	
British Afghan Women's Society	Parkfield Youth Football Club	
Harrow Association of Somali Voluntary Organisations (HASVO)	Pinner Albion Football Club	
Harrow Bengalee Association	Pinner Jewish Football Club	
Harrow Equalities Centre	Stanmore Football Club	
Harrow Somali Cultural & Educational Association	Age Concern Harrow	
	Harrow Mencap	
	CAPRA Canons Park Residents Association	
	Harrow Nature Conservation Forum	
	Harrow St Mary's	
	Kenton Town FC	
	Parkfield Football Club	
	Parkfield Youth FC	

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## Appendix 2: Shopping areas street cleaning EqIA

### Equality Impact Assessment (EqIA) Template

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 assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:	Tick ✓	Type of Decision:	Tick ✓
Transformation		Cabinet	✓
Capital		Portfolio Holder	
Service Plan		Corporate Strategic Board	
Other	✓	Other	
<b>Title of Project:</b>			
Removal of static sweepers from secondary shopping centres			
<b>Directorate / Service responsible:</b>			
E&E			
<b>Name and job title of lead officer:</b>			
Mick Wynne			
<b>Name &amp; contact details of the other persons involved in the assessment:</b>			
David Corby, Andrew Smith, Sajni Durve			
<b>Date of assessment:</b>			
13/01/2015 Review 16/01/15			

### Stage 1: Overview

#### 1. What are you trying to do?

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

Harrow Pride currently provides street cleansing services to all Harrow managed highways, with shopping areas covered on a daily basis by a combination of mobile crews covering multiple sites and dedicated beat sweepers who are assigned to a particular shopping area.

We are considering a new system to remove dedicated beat sweepers from secondary shopping areas and to remove late evening street cleansing from 1st April 2015. The new system means that a mobile team will undertake one daily single cleansing operation only, still ensuring that the area is cleaned Mon- Fri. There will be a reduced team working during weekends to undertake a cleansing operation and respond to reported cases around the borough.

**Additional cleaning will be available between these cycles - for example if a sudden build-up of litter occurs. We will ensure that a reactive workforce is in place to**

respond to customer referrals. The council's fly tip removal service will still be able to respond to requests from residents in the case of excessive fly tipping.

The proposals would realise a saving of £150K through the removal of 7 posts from the current staffing establishment.

Residents / Service Users	Partners	Stakeholders
Staff	Age	Disability
Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity
Race	Religion or Belief	Sex
Sexual Orientation	Other	

**2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)**

**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?

No. The responsibility for service lies with Enterprise & Environment, Harrow Pride.

## Stage 2: Evidence / Data Collation

What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. 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; complaints etc. Where possible include data on the nine Protected Characteristics.

(Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)

Borough wide 2011 census data (see data below) shows that Harrow has a fairly significant elderly population with 14.1% over the age of 65. The removal of beat sweepers could cause the streets to become more littered as no mitigation measures have been provided therefore the quality of the area could go down. Elderly / vulnerable residents may be more affected by the perception of crime if streets are dirtier and more littered. Elderly / vulnerable residents may also feel relatively unsafe and uncomfortable in areas that are dirtier and more littered when compared to younger residents.

**Borough – wide age structure statistics from 2011 census**

<b>Harrow</b>	<b>2011 Data</b>	<b>2011 %</b>	<b>2011 Rank - National</b>
All usual residents	239,056		
0 - 4	15,916	6.7	76
5 - 7	9,007	3.8	40
8 - 9	5,414	2.3	87
10 - 14	14,590	6.1	96
15	3,131	1.3	83
16 - 17	6,604	2.8	34
18 - 19	5,369	2.2	192
20 - 24	16,066	6.7	89
25 - 29	19,345	8.1	47
30 - 44	53,358	22.3	45
45 - 59	44,579	18.6	277
60 - 64	12,010	5	301
65 - 74	17,420	7.3	287
75 - 84	11,659	4.9	283
85 - 89	2,982	1.2	288
90 & over	1,606	0.7	252
Average Age (Mean)	37.6		287
Median Age	36		284

In 24% (20,323) of Harrow's households one person has a long-term health problem or disability including dependant and no dependent children (please see table below). This equates to a 10% value across the population. The Environment Consultation results indicate 14% of respondents declaring a disability or health problem of which 9% refer to mobility issues.

If large litter items are not swiftly removed from footways, this could affect access mobility and significantly affect people with mobility and visual impairments.

Age (including carers of young/older people)

Disability (including carers of disabled people)

**Adults not in Employment and Dependent Children and Persons with Long-term Health Problem or Disability for all Households**

Harrow	2011	2011	2011	2011	2011
	Data	%	Rank – National	Rank - London	
All households	84,268				
<b>Households with:</b>					
No adults in employment with dependent children	3,675	4	116	24	24
No adults in employment with no dependent children	18,788	22	324	15	15
Dependent children of all ages	30,670	36	6	5	5
Dependent children aged 0 - 4	12,435	15	24	13	13
One person in household with a long-term health problem or disability: With dependent children	5,038	6	20	6	6
One person in household with a long-term health problem or disability: No dependent children	15,285	18	293	10	10
One or more person with a limiting long-term illness	N/A	N/A	N/A	N/A	N/A

No data collected. Unlikely to have an adverse disproportionate effect.

No data collected. Unlikely to have an adverse disproportionate effect.

No data collected. Unlikely to have an adverse disproportionate effect.

Data available but not presented here as unlikely to have an adverse disproportionate effect.

Data available but not presented here as unlikely to have an adverse disproportionate effect.

Users

Borough- wide census data available, but not presented here as unlikely to have an adverse disproportionate effect.

Staff

			7% of staff in the Harrow Pride team are female. However, impact on staff is a reduction in numbers in equal measure and does not disproportionately affect this protected characteristic.
Sexual Orientation		No data collected. Unlike to have an adverse disproportionate effect.	
Socio Economic		If streets and roads are left untidy, this could devalue surrounding properties. Untidy roads could also lead to shops closing down resulting in fewer turnovers for businesses. However, no particular roads or streets have been specifically targeted therefore a particular shopping street/parade is unlikely to be adversely disproportionately affected.	

**5. What consultation have you undertaken on your proposals?**

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? (This may include further consultation with the affected groups, revising your proposals).
The consultation was carried out over the period 11 <sup>th</sup> September 2014 to 8 <sup>th</sup> November, 2014.  The consultation has given all the residents the opportunity to respond.	The consultation has been promoted widely through posters, articles in the press and the web.  The consultation has had the most engagement in recent years and a variety of mechanisms to engage residents were taken forward: 100,000 Take part	A presentation giving a summary of all of the consultation feedback is attached to this EqlA at <b>Appendix A</b> .  <b>Survey Responses</b>  Specifically in relation to impacts of the proposed changes in the survey residents were specifically asked which impacts would affect them most as an individual/family and a further question asking which proposals would impact the community as a whole. The following were fed back in order as having the most impact: E&E sections include <i>Impact on you and your family:</i>  1. Introducing a separate weekly food waste collection and charge	Based on the findings from this consultation elected members will be making a decision on the proposals that are to be taken forward for individual consultation. All proposals that are being taken forward to consultation will have their own individual detailed EqlA.  Councillors have confirmed that they will be taking forward a campaign for a fairer grant for Harrow.

	<p>Booklets developed with survey distributed widely to stakeholder distribution list and through Harrow People</p> <p>6000 booklets distributed as part of events</p> <p>Specific web pages relating to the consultation and online web survey</p> <p>7 Roadshows and 10 Drop in sessions held across Harrow and attendance at 50 Community Group meetings across Harrow resulting in 361 face to face in depth conversations</p> <p>Translated documents on the web and in hard copy</p> <p>Easy read of the consultation booklet and survey</p> <p>Information on Facebook, Twitter and 4 responses received by video</p>	<p>for fortnightly collections of garden waste</p> <p>2. Switch off some streetlights, or reduce the hours that they are on for</p> <p><i>Impact on the community as a whole</i></p> <ol style="list-style-type: none"> <li>1. Introducing a separate weekly food waste collection and charge for fortnightly collections of garden waste</li> <li>2. Changes to parks maintenance</li> <li>3. Relocation of beat sweepers from secondary shopping centres</li> <li>4. Reduction in grass verge cutting</li> </ol> <p>The impact on the protected characteristics for each of these proposals has not been specifically collected however this will be explored in the individual Equality Impact Assessments if proposals are taken forward for further consideration. However the proposals that have been highlighted by the community as ones with the most impact that will have an obvious impact on groups with protected characteristics because they are users of their services are:</p> <ul style="list-style-type: none"> <li>- Cutting some support provided to older and disabled people in Harrow under the Supporting People programme and</li> <li>- Close or reduce some of the Council's early support services to families, including Children's Centres.</li> </ul> <p><b>Formal Letters</b></p> <p>23 formal responses were received which included feedback that some of the proposals could have impacts on groups that sit within the protected characteristics. These letters are not related to Environment proposals</p> <p><b>Petitions</b></p> <p>15 Petitions were received however none related to this proposal.</p> <p><b>Harrow Youth Parliament</b></p>	
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		The Youth Parliament tailored their own survey in response to Take Part which was asking whether young people agreed with proposals and therefore no feedback on impact. There were 495 responses received by the Council. The young people also held a debate and within this there was some concern relating to closure of libraries as used by young people and people to avoid isolation.	

6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?	N/A
List the Title of reports / documents and websites here.	

### Stage 3: Assessing Potential Disproportionate Impact

7. 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

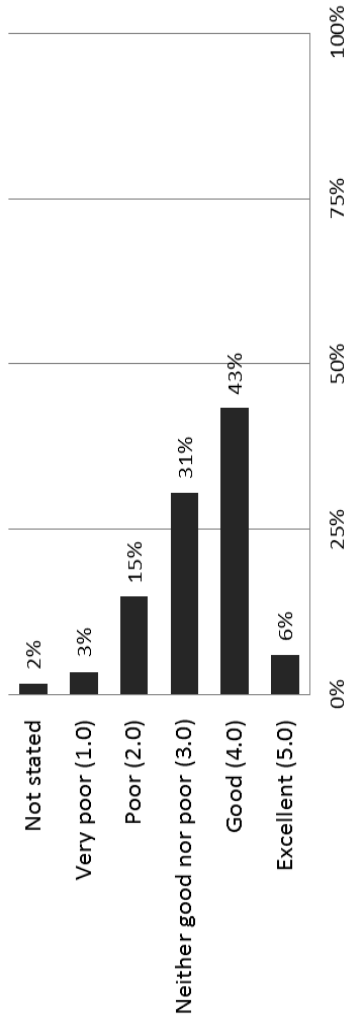
**YES** - If there is a risk of disproportionate adverse impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

- **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
  - It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.
- NO** - If you have ticked 'No' to all of the above, then go to **Stage 6**
- Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

These graphs below are from the consultation questions:

Around half of respondents (49%) rated current cleaning standards as good or excellent, with only 15% saying they were poor or and 3% very poor. This gave a mean score of 3.3 out of 5 for this rating question.

**Q22. How do you rate the current cleaning standards within shopping areas? (mean score = 3.3)**

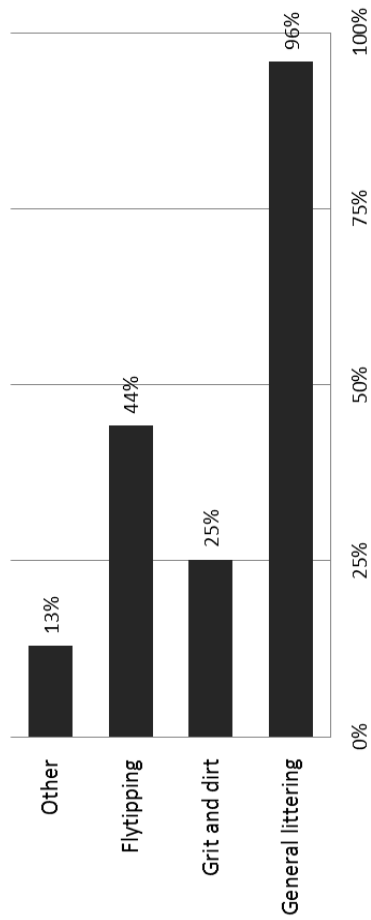


8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?

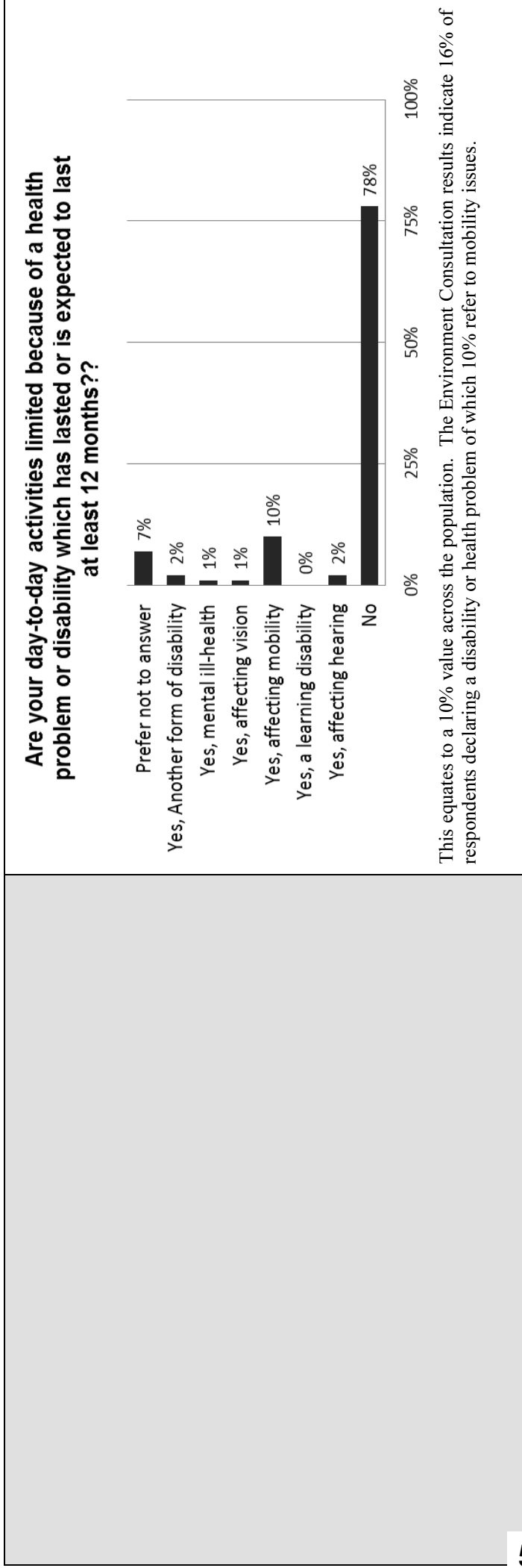
56 (include this evidence, including any data, statistics, titles of documents and website links here)

Of those who rated it poor or very poor, the majority cited general littering (96%) followed by flytipping (44%) as the main reason for that rating.

**Q23. If you are not happy with the current cleaning is it due to...?**







57 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? (This may include further consultation with the affected groups, revising your proposals).
Community Champions Housing Tenants Key Community groups	An online survey supported by self-completion, plus hard copy questionnaires available at local libraries. The Community Engagement team publicised the web-link through the Community Champion network and key community organisations as well as publicising it on the Harrow website, events, and libraries. A sample of 520 has been achieved to date	Over 50% of respondents consider the current service to be good or better.  Of those who rated it poor or very poor, the majority cited general littering (97%) followed by flytipping (42%) as the main	Consultation feedback has identified key priorities for any targeted cleaning the use of the rapid response teams to mitigate impacts.

<p>Staff</p>	<p>The survey is around 15 minutes in length, comprised of a mix of pre-coded and open ended questions.</p> <p>Members of staff were advised of the proposals that had staff impacts prior to the commencement of the Take Part and Cabinet reports proposing savings and took part in the Take Part Employee consultation. In addition, Trade Union colleagues have been given briefings prior to each Cabinet meeting agenda publication.</p>	<p>reason for that rating.</p> <p>There will be a staff impact through the deletion of seven posts from the establishment. These posts are currently filled by agency workers so there will be no reduction in the number of permanent staff or redundancy but the reduction in posts may have an impact on remaining staff.</p> <p>There is also a wider impact on staff across the Council as the deletion of full time equivalent posts reduces the redeployment opportunities to displaced staff as the organisation progress its change programme.</p>	<p>Socio-economic and health impacts will be monitored using the Action Plans in the EqIAs.</p> <p>E&amp;E will work with the corporate Organisational Development team in mitigating this impact.</p>
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## Stage 5: Assessing Impact and Analysis

10. What does your evidence 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	Adverse	Positive	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 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 7)
Age (including carers of young/older people)	✓	✓	<p>The streets are likely to be more littered as dedicated beat sweepers are being removed and therefore the quality of the area may go down. Elderly / vulnerable residents may be more affected by the perception of crime if streets are dirtier and more littered. Elderly / vulnerable residents may also feel unsafe and uncomfortable in areas that are dirtier and more littered.</p> <p>The prime implication is likely to be an increase in general littering throughout the day.</p>	<p>Of the 20% who rated standards poor or very poor, the majority cited general littering (97%) followed by flytipping (42%) as the main reason for that rating. Of these 34% (6.8% of total sample) were ages 65+</p> <p>More efficient use of mobile teams to deal with excessive accumulation</p> <p>There will remain rapid response teams who will be able to address fly tips and unacceptably excessive amounts of litter and other debris in between any scheduled cleansing operation, maintaining the existing SLA time for addressing such issues.</p> <p>If monitoring indicates continuing issues the roads affecting can be reviewed under the Zonal cleansing approach.</p>
Disability (including carers of disabled people)	✓		<p>If large litter items are left on the road, this could affect access mobility and significantly affect people with mobility and visual impairments.</p>	<p>Of the 20% who rated standards poor or very poor, all respondents who declared a disability cited general littering</p> <p>There will remain rapid response teams who will be able to address fly tips and unacceptably excessive amounts of litter and other debris in between any scheduled cleansing operation, maintaining the existing SLA time for addressing such issues.</p>

Gender				Unlikely to have an adverse disproportionate effect.	
Reassignment				Unlikely to have an adverse disproportionate effect.	
Marriage and Civil Partnership				Unlikely to have an adverse disproportionate effect.	
Pregnancy and Maternity				Unlikely to have an adverse disproportionate effect.	
Race				Unlikely to have an adverse disproportionate effect.	
Religion or Belief				Unlikely to have an adverse disproportionate effect.	
Sex				Unlikely to have an adverse disproportionate effect.	
Sexual orientation				Unlikely to have an adverse disproportionate effect.	
Socio Economic				Potential redundancy impact on employed staff	Staff reduction will be met by existing vacancies or discontinuation of Agency staff. There will be no redundancies affecting permanently employed staff

**11. Cumulative Impact** – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?

If yes, which Protected Characteristics could be affected and what is the potential impact?

Yes

No



The newly introduced Zonal cleaning system – is that likely to have a cumulative impact on non-shops roads. However the adaptive nature of the zonal scheme will allow flexibility to respond to local 'hotspots'

The potential negative impacts can be justified when the proposed mitigating steps are considered.

Harrow's current street cleansing service provides for: the removal of all litter and debris from streets and paths and other areas adjoining the public highway and the collection of leaf fall.

The requirement to make financial economies is likely to impact the frequency at which some aspects of street cleansing are provided. Although the cleansing approach will look to utilise resources more effectively through a targeted approach to cleansing frequencies, the reduction in static cleaners to secondary shopping centres could potentially result in a greater accumulation of litter, debris, flytips, and other obstructions on the public highway which may detrimentally and disproportionately impact upon older people, people with mobility impairments and/or people with impaired vision. An increase in litter and debris may also increase the likelihood of slips, trips and falls in the borough.

As mitigating steps against these potential impacts, there will remain rapid response teams who will be able to address fly tips and unacceptably excessive levels of litter and other debris in between any scheduled cleansing operation. In addition, the Council will be introducing enforcement measures to tackle anti social behaviour such as littering, which should minimise obstructions, improve the street scene and enhance local environmental.

	Yes	✓	No
<p><b>11a. Any Other Impact</b> – 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?</p> <p>If yes, what is the potential impact and how likely is to happen?</p>			<p>If streets and roads are left untidy, this could devalue surrounding properties. Untidy roads could also lead to shops closing down resulting in fewer turnovers for businesses. However, no particular roads or streets have been targeted therefore this group is unlikely to be adversely disproportionately affected.</p>
<p><b>12.</b> Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged? <b>(Please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act) available on Harrow HUB/Equalities and Diversity/Policies and Legislation</b></p>			
<p>Yes</p>			
<p>No</p>	X	X	X
<p>62 ... 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)</p> <p>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.</p> <ul style="list-style-type: none"> <li>▪ If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. <b>(select outcome 4)</b></li> <li>▪ If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. <b>(select outcome 4)</b></li> </ul>	X	X	X

## Stage 6: Decision

**13.** 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: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.	
<b>Outcome 2</b> – Minor adjustments to remove / mitigate adverse impact or advance 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 7</i>	X
<b>Outcome 3</b> – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. 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. <b>(Explain this in 13a 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>13a.</b> If your EqIA is assessed as <b>outcome 3 or you have ticked 'yes' in Q12</b> , explain your justification with full reasoning to continue with your proposals.	

## Stage 7: Improvement Action Plan

List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
<b>Disability &amp; Age</b> Possibility that the reduced cleansing frequency in some areas may affect people in wheelchairs and/or people with other mobility impairments and/or those with visual impairments	Retention of Rapid Response teams to be able to respond to service requests relating to excessive littering, debris or fly tipping to allow for removal within the current SLA of 24 hours  Monitor deployment of mobile and amend work schedules to meet variable demand	The Collective system captures all service requests and is used to monitor the response time to rectify. The retention of Rapid Response teams will allow the service to maintain its current performance	Sept 2015	Michael Wynne	

## Stage 8 - Monitoring

<p><b>15.</b> How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>As well as in house monitoring through the creation of random inspections via the Collective system, further monitoring of street cleansing performance is undertaken by an independent external body on 3 occasions per year.</p> <p>A full breakdown of performance, causes of litter, land class performance is provided as part of the external monitoring and assessment of cleansing performance. The classification of areas into zones is not rigid and, if data suggests that the classification of an area into a particular zone disproportionately affects one of the protected groups, this will be reviewed and appropriate adjustments made.</p> <p>Full consultation analysis to be completed.</p>	
<p><b>16.</b> How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>		
<p><b>17.</b> Have you received any complaints or compliments about the proposals being assessed? If so, provide details.</p>		
<p><b>Stage 9: Public Sector Equality Duty</b></p>		
<p><b>18.</b> How do your proposals contribute towards 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>N/a</p>	<p>N/a</p>	<p>N/a</p>
<p><b>Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)</b></p>		
<p><b>The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.</b></p>		
<p><b>19.</b> Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?</p>		
<p>Signed: (Lead officer completing EqIA)</p>	<p>Mick Wynne</p>	<p>Signed: (Chair of DETG)</p> <p>Hanif Islam</p>
<p>Date:</p>	<p>16/01/2015</p>	<p>Date:</p>



Date EqIA presented at the EqIA Quality Assurance Group	28/01/2015	Signature of ETG Chair	PP Hanif Islam
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# Appendix 1

## Consultees

Afghan Association of London (Harrow)	Harrow Somali Cultural & Educational Association	Harrow Nature Conservation Forum
Association of Senior Muslim Citizens	Jaago Punjabi Women's Group	Harrow St Mary's
Gujarati Arya Association	Pinner Association	Kenton Town FC
Harrow Bengalee Association	Wealdstone Active Community	Parkfield Football Club
Harrow Iranian Community Association (HICA)	ADHD and Autism Support Harrow	Parkfield Youth FC
Harrow Tamil Association	Mind in Harrow	Pinner Albion FC
Indian Association of Harrow	National Osteoporosis Society Middlesex Group	St Josephs Youth FC
Nepalese British Community UK	Rethink: Harrow Support Group	Stanmore Manor FC
Pakistan Society of Harrow	Friends of Bentley Priory Nature Reserve	Three Wishes Exiles
Russian Immigrants Association	Friends of Canons Park	Venceremos FC
The Harrow African Caribbean Association (HACAS)	Friends of West Harrow Park	APB FC
UK Asian Women's Conference (North London)	Harrow Youth Parliament	Lankians CC
Harrow in Business (HiB)	Capable Communities Ltd.	Pinner Challengers CC
Canons Community Association	The Wish Centre	Pinner Cricket Club
Harrow Association of Disabled People	The Stanmore Society	South Harrow CC
Harrow in Leaf	Bessborough Cricket Club	Tamil Union CC
Middlesex Association for the Blind	Harrow Rugby Football Club	West Harrow CC
Harrow Heritage Trust	Harrow St. Mary's Youth Football Club	Yarl CC
North West London Lesbian & Gay Group (NWLLG)	Pinner Cricket Club	Youth Wing CC
Harrow Civic Residents' Association (HCRA)	Pinnstars Football Club	Culver Bowls Club
Hatch End Association	Harrow Mencap	Harrow Weald Bowls Club
HFTRA (Harrow Federation of Tenants' & Residents' Associations)	Harrow Over 50 club	Pinner Bowls Club
Harrow Association of Voluntary Service	Harrow Community Transport	Stanmore Bowls Club
Voluntary Action Harrow	Harrow Centre for Volunteering	Pinner & Grammarians Rugby Football Club
Angolan Civic Communities Alliance (ACCA)	Harrow Volunteer Centre	
Harrow	Harrow Women's Centre	
British Afghan Women's Society	Headstone Manor Youth Football Club	
Harrow Association of Somali Voluntary Organisations (HASVO)	Parkfield Youth Football Club	
Harrow Bengalee Association	Pinner Albion Football Club	
Harrow Equalities Centre	Pinner Jewish Football Club	
	Stanmore Football Club	
	Age Concern Harrow	
	Harrow Mencap	
	CAPRA Canons Park Residents Association	

### Appendix 3: Reduce Parks service to statutory minimum

## Equality Impact Assessment (EqIA) Template

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 assessment. It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:	Tick ✓	Type of Decision:	Tick ✓
Transformation		Cabinet	✓
Capital		Portfolio Holder	
Service Plan		Corporate Strategic Board	
Other	✓	Other	
<b>Title of Project:</b>			
Reduce Parks service to statutory minimum and reduce parks management cost			
Directorate / Service responsible:			
E&E			
Name and job title of lead officer:			
Mick Wynne			
Name & contact details of the other persons involved in the assessment:			
David Corby, Andrew Smith, Sajni Durve			
Date of assessment:			
14/01/2015			
<b>Stage 1: Overview</b>			

#### 1. What are you trying to do?

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

Harrow Pride currently provides a full maintenance service to all parks & open spaces within the Borough, with the aim of providing leisure, recreational and play facilities for the community whilst maintaining the environmental assets of the Boroughs Parks & Open Spaces.

The main proposal is to convert some of the parks into wildlife open spaces. This is a complex proposal involving: reducing grass cutting to only that which is needed for Health and Safety reasons, reducing pruning, and removing some shrub, rose and flower beds. The Local Authority has a duty to ensure that open spaces and parks are safe for public enjoyment and that people using the areas, so far as is practical, can enjoy the areas without exposure to risks to their health and safety.

**The proposals would see parks maintenance reduced to a statutory minimum with**

the exception of sports provision, where an income is received from clubs to provide a suitable playing surface in line with the relevant requirements. The move to a statutory minimum would see the following changes to the current maintenance regime: A table of changes is also included in Table1

- Parks would cease to be locked overnight
- Grass areas would be left naturalised (with the exception of sports pitches) and be subject to an annual conservation cut only
- Pruning of shrubs and hedges would reduce from up to 3 times per year to once a year
- Litter picking and emptying of bins would reduce from twice weekly to once a week

No parks would be submitted for the Green Flag award (currently 5 parks have attained this national recognition). The proposals would realise savings through the removal of 11 posts from the current staffing establishment and associated vehicles.

The reduction in management posts within the parks structure is linked to a proposed reduction in parks maintenance to a statutory minimum level, with the exception of sports provision, where an income is received from clubs to provide a suitable playing surface.

If the reduction in parks maintenance is agreed, this proposal would also see the removal of 1 Team Leader post and 2 Charge hand posts from the current staffing establishment, which would realise savings.

These changes combined will produce a saving of £327k

	Residents / Service Users	Partners	Stakeholders
	Staff	✓	Age
Gender Reassignment	✓	Marriage and Civil Partnership	Pregnancy and Maternity
Race		Religion or Belief	Sex
Sexual Orientation		Other	

2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)

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?

**Stage 2: Evidence / Data Collation**

4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. 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; complaints etc. Where possible include data on the nine Protected Characteristics.

Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)

Age (including carers of young/older people)	<p>Borough wide 2011 census data (see data below) shows that Harrow has a fairly significant elderly population with 14.1% over the age of 65. There is a possibility that the reduced cleansing frequency and changes in the grass cutting regime may affect older people and those with mobility impairments and/or impaired vision. Long grass can hide litter and obstructions which could contribute to slip/trip hazards and make movement off the main paths more hazardous for those that are old and infirm. Perception of increase in crime if gates left opened and appearance of unmanaged and unmaintained facility.</p> <p><u>Borough – wide age structure statistics from 2011 census</u></p>		
	Harrow	2011	2011

	<b>Data</b>	<b>%</b>	<b>Rank - National</b>
All usual residents	239,056		
0 - 4	15,916	6.7	76
5 - 7	9,007	3.8	40
8 - 9	5,414	2.3	87
10 - 14	14,590	6.1	96
15	3,131	1.3	83
16 - 17	6,604	2.8	34
18 - 19	5,369	2.2	192
20 - 24	16,066	6.7	89
25 - 29	19,345	8.1	47
30 - 44	53,358	22.3	45
45 - 59	44,579	18.6	277
60 - 64	12,010	5	301
65 - 74	17,420	7.3	287
75 - 84	11,659	4.9	283
85 - 89	2,982	1.2	288
90 & over	1,606	0.7	252
Average Age (Mean)	37.6		287
Median Age	36		284

In 24% (20,323) of Harrow's households one person has a long-term health problem or disability including dependant and no dependent children (please see table below). This equates to a 10% value across the population. The Environment Consultation results indicate 14% of respondents declaring a disability or health problem of which 9% refer to mobility issues.

There is a possibility that the reduced cleansing frequency and changes in the grass cutting regime may affect people in wheelchairs and/or people with other mobility impairments and/or those with visual impairments. Long grass can hide litter and obstructions which could contribute to slip/trip hazards and make movement off the main paths more hazardous for those in wheelchairs and/or people with other mobility impairments and/or those with visual impairments.

**Adults not in Employment and Dependent Children and Persons with Long-term Health Problem or Disability for all Households**

Harrow	2011	2011	2011	2011	2011
	Data	%	Rank - National	Rank - London	
All households	84,268				
<b>Households with:</b>					
No adults in employment with dependent children	3,675	4	116	24	
No adults in employment with no dependent children	18,788	22	324	15	
Dependent children of all ages	30,670	36	6	5	
Dependent children aged 0 - 4	12,435	15	24	13	
One person in household with a long-term health problem or disability: With dependent children	5,038	6	20	6	
One person in household with a long-term health problem or disability: No dependent children	15,285	18	293	10	
One or more person with a limiting long-term illness	N/A	N/A	N/A	N/A	N/A

**No data collected. Unlikely to have an adverse disproportionate effect.**

**No data collected. Unlikely to have an adverse disproportionate effect.**

**No data collected. Unlikely to have an adverse disproportionate effect.**

**No data collected. Unlikely to have an adverse disproportionate effect.**

Disability (including carers of disabled people)

Religion and Belief	Data available but not presented here as unlikely to have an adverse disproportionate effect.	
Sex / Gender	<p><u>Users</u></p> <p>Borough- wide census data available, but not presented here as unlikely to have an adverse disproportionate effect.</p>	<p><u>Staff</u></p> <p>7% of staff in the parks team are female. However, impact on staff is a reduction in numbers in equal measure and does not disproportionately affect this protected characteristic.</p>
Sexual Orientation	No data collected. Unlikely to have an adverse disproportionate effect.	
Socio Economic	No data collected. Unlikely to have an adverse disproportionate effect.	
72 What consultation have you undertaken on your proposals?		
Who was consulted?	What consultation methods were used?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).
The consultation was carried out over the period 11 <sup>th</sup> September 2014 to 8 <sup>th</sup> November, 2014.	<p>The consultation has been promoted widely through posters, articles in the press and the web.</p> <p>The consultation has</p>	<p>Based on the findings from this consultation elected members will be making a decision on the proposals that are to be taken forward for individual consultation. All proposals that are being taken forward to consultation will have</p>
	<p>What do the results show about the impact on different groups / Protected Characteristics?</p>	<p>A presentation giving an summary of all of the consultation feedback is attached to this EqIA at <b>Appendix A.</b></p> <p><b>Survey Responses</b></p> <p>Specifically in relation to impacts of the proposed changes in the survey residents were specifically asked which</p>



<p>The consultation has given all residents the opportunity to respond.</p>	<p>had the most engagement in recent years and a variety of mechanisms to engage residents were taken forward: 100,000 Take part Booklets developed with survey distributed widely to stakeholder distribution list and through Harrow People 6000 booklets distributed as part of events Specific web pages relating to the consultation and online web survey</p>	<p>impacts would affect them most as an individual/family and a further question asking which proposals would impact the community as a whole. The following were fed back in order as having the most impact: E&amp;E sections include <i>Impact on you and your family:</i></p> <ol style="list-style-type: none"> <li>1. Introducing a separate weekly food waste collection and charge for fortnightly collections of garden waste</li> <li>2. Switch off some streetlights, or reduce the hours that they are on for</li> </ol> <p><i>Impact on the community as a whole</i></p> <ol style="list-style-type: none"> <li>1. Introducing a separate weekly food waste collection and charge for fortnightly collections of garden waste</li> <li>2. Changes to parks maintenance</li> <li>3. Relocation of beat sweepers from secondary shopping centres</li> <li>4. Reduction in grass verge cutting</li> </ol> <p>The impact on the protected characteristics for each of these proposals has not been specifically collected however this will be explored in the individual Equality Impact Assessments if proposals are taken forward for further consideration. However the proposals that have been highlighted by the community as ones with the most impact that will have an obvious impact on groups with protected characteristics because they are users of their services are:</p> <ul style="list-style-type: none"> <li>- Cutting some support provided to older and disabled people in Harrow under the Supporting People programme and</li> <li>- Close or reduce some of the Council's early support services to families, including Children's Centres.</li> </ul>	<p>their own individual detailed EqIA. Councillors have confirmed that they will be taking forward a campaign for a fairer grant for Harrow.</p>
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	<p>consultation booklet and survey</p> <p>Information on Facebook, Twitter and 4 responses received by video</p>	<p><b>Formal Letters</b></p> <p>23 formal responses were received which included feedback that some of the proposals could have impacts on groups that sit within the protected characteristics. These letters are not related to Environment proposals</p> <p><b>Petitions</b></p> <p>15 Petitions were received and these the following was received in relation to Environmental services:</p> <ul style="list-style-type: none"> <li>- 1 petition about locking of park gates with 108 signatures</li> </ul> <p><b>Harrow Youth Parliament</b></p> <p>The Youth Parliament tailored their own survey in response to Take Part which was asking whether young people agreed with proposals and therefore no feedback on impact. There were 495 responses received by the Council. The young people also held a debate and within this there was some concern relating to closure of libraries as used by young people and people to avoid isolation.</p>
<p><b>6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?</b></p> <p>List the Title of reports / documents and websites here.</p>	<p>None</p>	
<p><b>Stage 3: Assessing Potential Disproportionate Impact</b></p>		
<p><b>7. 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?</b></p>		

	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

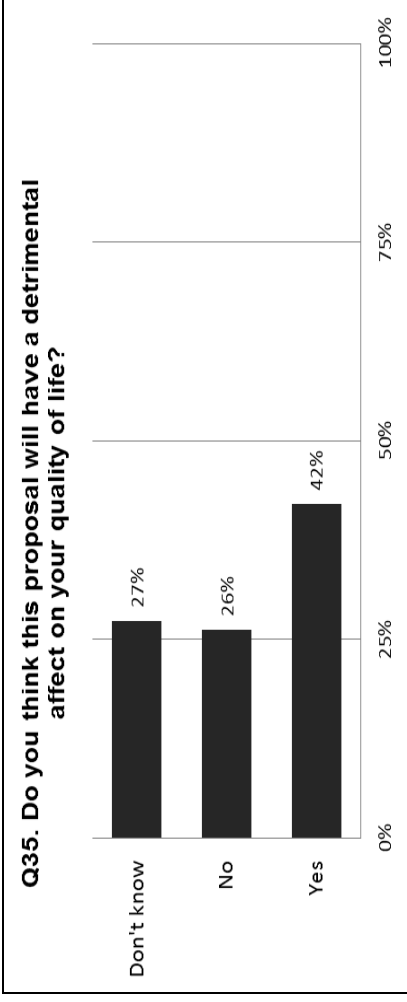
**YES** - If there is a risk of disproportionate adverse Impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

- Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
- It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

**NO** - If you have ticked 'No' to all of the above, then go to **Stage 6**

- Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

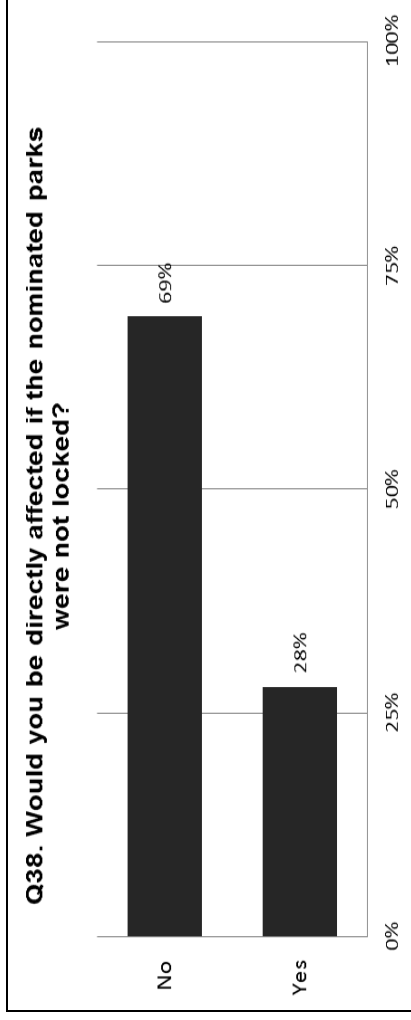
Just over 4 out of 10 respondents (42%) said that the proposal would have a detrimental affect on their quality of life, with around a quarter (26%) saying it wouldn't.



8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?

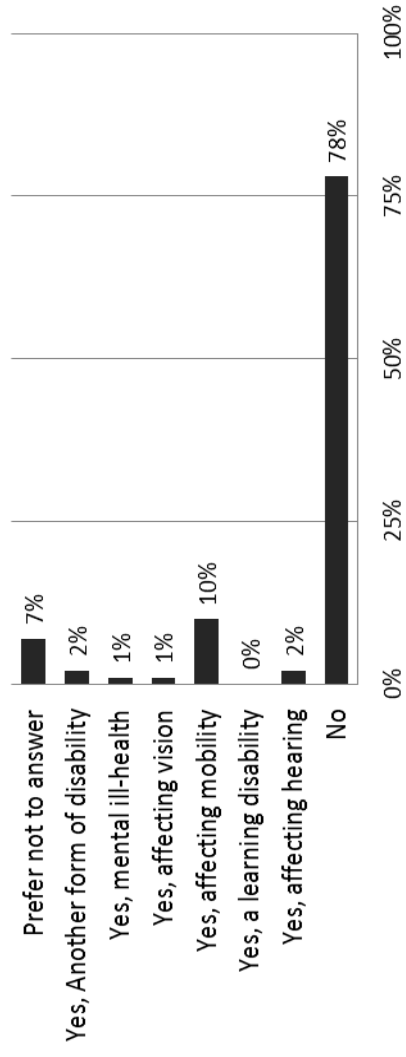
76 include this evidence, including any data, statistics, titles of documents and website links (here)

In terms of park locking, Just under 7 out of 10 respondents (69%) said that they would not be directly affected if the nominated parks were not locked. Around 3 out of 10 respondents (28%) said they would be affected.



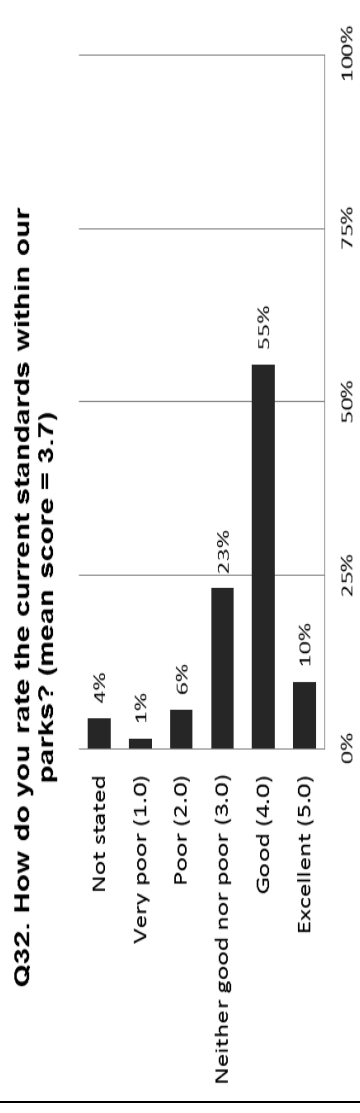
Of those who said they would be affected, 'illegal activity' followed by 'fear of crime' and 'disturbance' were the main concerns.

**Are your day-to-day activities limited because of a health problem or disability which has lasted or is expected to last at least 12 months??**



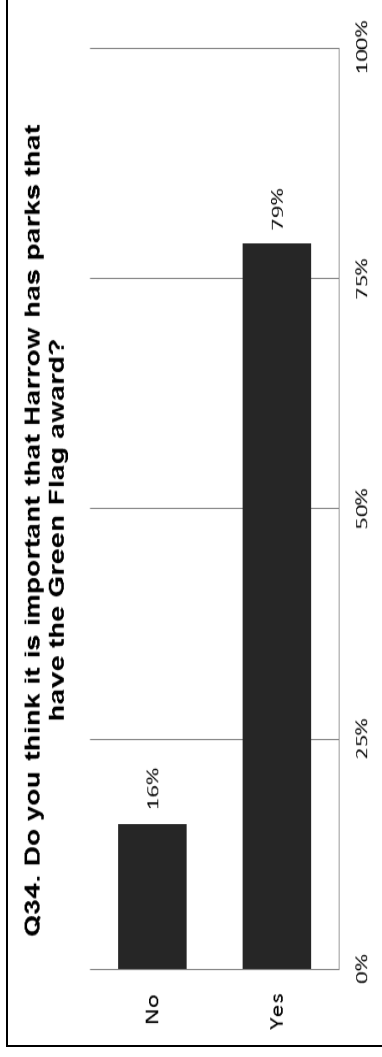
This equates to a 10% value across the population. The Environment Consultation results indicate 16% of respondents declaring a disability or health problem of which 10% refer to mobility issues.

When asked to rate current standards within our parks, 65% of respondents said they were good or excellent. Only 7% of respondents said they were poor or very poor. This gave a mean score rating of 3.7 out of 5.



Those who rated poor or very poor were asked for their reasons, and 'general standards of maintenance' followed by 'general littering' were the two largest responses, albeit from a very small base who rated them as poor.

Almost 8 out of 10 respondents (79%) thought it was important that Harrow has parks with Green Flag status.



**9. 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? (This may include further consultation with the affected groups, revising your proposals).
<p>Community Champions Housing Tenants Key Community groups</p>	<p>An online survey supported by self-completion, plus hard copy questionnaires available at local libraries. The Community Engagement team publicised the web-link through the Community Champion network and key community organisations as well as publicising it on the Harrow website, events, and libraries. A sample of 520 has been achieved to date</p> <p>The survey is around 15 minutes in length, comprised of a mix of pre-coded and open ended questions.</p>	<p>Over 50% of respondents consider the current service to be good or better.</p> <p>Of those who rated it poor or very poor, the majority cited general littering (97%) followed by flytipping (42%) as the main reason for that rating</p>	<p>Consultation feedback has identified key priorities for any targeted cleaning have directed mitigations</p>

<p>Staff</p>	<p>Members of staff were advised of the proposals that had staff impacts prior to the commencement of the Take Part and Cabinet reports proposing savings and took part in the Take Part Employee consultation. In addition, Trade Union colleagues have been given briefings prior to each Cabinet meeting agenda publication.</p>	<p>There will be a staff impact through the deletion of fourteen posts from the establishment. These posts are currently filled by agency workers so there will be no reduction in the number of permanent staff or redundancy but the reduction in posts may have an impact on remaining staff.</p> <p>There is also a wider impact on staff across the Council as the deletion of full time equivalent posts reduces the redeployment opportunities to displaced staff as the organisation progress its change programme.</p>	<p>Socio-economic and health impacts will be monitored using the Action Plans in the EqIAs</p> <p>E&amp;E will work with the corporate Organisational Development team in mitigating this impact</p>
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**Stage 5: Assessing Impact and Analysis**

**10.** What does your evidence 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	Adverse ✓	Positive ✓	<p>Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.</p> <p><b>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9</b></p> <p>Possibility that the reduced cleansing frequency and changes in the grass cutting regime may affect older people and those with mobility impairments and/or impaired vision. Long grass can hide litter and obstructions which could contribute to slip/trip hazards and make movement off the main paths more hazardous for those that are old and infirm. Perception of increase in crime if gates left opened and appearance of unmanaged and unmaintained facility.</p>	<p>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 7)</p> <p>Just under 4 out of 10 respondents (38%) said that the proposal would have a detrimental affect on their quality of life, with around 3 out of 10 (31%) saying it wouldn't.</p> <p>Path borders and accessible fencelines will be cut and/or pruned at current standards to ensure safe passage from vegetation and possibly hidden litter and natural surveillance in terms of reducing fear of crime.</p> <p>More efficient use of mobile teams to deal with excessive accumulation</p> <p>There will remain rapid response teams who will be able to address fly tips and unacceptably excessive amounts of litter and other debris in between any scheduled cleansing operation, maintaining the existing SLA time for addressing such issues</p> <p>If monitoring indicates continuing issues in key parks, they can be reviewed under the Zonal cleansing approach</p>
Age (including carers of young/older people)	✓			
Disability (including carers of disabled people)	✓		<p>Possibility that the reduced cleansing frequency and changes in the grass cutting regime may affect people in wheelchairs and/or people with other mobility impairments and/or those with visual impairments. Long grass can hide litter and obstructions which could contribute to slip/trip hazards and make movement off the main paths more hazardous for those that are old and infirm.</p>	<p>Just under 4 out of 10 respondents (38%) said that the proposal would have a detrimental affect on their quality of life, with around 3 out of 10 (31%) saying it wouldn't.</p> <p>Path borders and accessible fencelines will be cut and/or pruned at current standards to ensure safe passage from vegetation and possibly hidden litter and natural surveillance in terms of reducing fear of crime.</p>



				<p>More efficient use of mobile teams to deal with excessive accumulation</p> <p>There will remain rapid response teams who will be able to address fly tips and unacceptably excessive amounts of litter and other debris in between any scheduled cleansing operation, maintaining the existing SLA time for addressing such issues</p> <p>If monitoring indicates continuing issues in key parks, they can be reviewed under the Zonal cleansing approach</p>
Gender Reassignment			No disproportionate adverse effect.	
Marriage and Civil Partnership			No disproportionate adverse effect.	
Pregnancy and Maternity			No disproportionate adverse effect.	
Race			No disproportionate adverse effect.	
Religion or Belief			No disproportionate adverse effect.	
Sex			No disproportionate adverse effect.	
Sexual			No disproportionate adverse effect.	

orientation																																
Socio Economic																																
Parks can be considered an integral part of the social support network. Green spaces have been shown to have a positive effect on mental wellbeing and parks are a regular venue for sports, casual fitness activity and walking, which can have a significant positive effect on fitness. Following consultation 8% of respondents considered it important to retain Green Flag Parks					Parks will change it is now proposed to maintain a capability to aspire to retaining Green Flag status at most of the current Green Flag Parks.					Maintaining key major parks at disparate geographic locations will mitigate some perception and fitness implications. Existing booked sports facilities in parks will be maintained to existing standards					Parks will be monitored for increases in crime, especially in terms of car parks where there is a greater likelihood of nuisance occurring																	
28% of responders have expressed concern over not locking park gates with a significant bias towards fear of crime					Potential redundancy impact on employed staff					Staff reduction will be met by existing vacancies or discontinuation of Agency staff. There will be no redundancies affecting permanently employed staff																						
11. 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					X																	
If yes, which Protected Characteristics could be affected and what is the potential impact?																																
11a. 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					X					No																	
If yes, what is the potential impact and how likely is to happen?					Although crime figures are not significant in parks 'Fear of Crime' can be a real factor in people's perception																											
12. Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic 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) available on Harrow HUB/Equalities and Diversity/Policies and Legislation																																
Yes			X			Age (including carers)			Disability (including carers)			Gender Reassignment			Marriage and Civil Partnership			Pregnancy and Maternity			Race			Religion and Belief			Sex			Sexual Orientation		

No		X	X	X	X	X	X	X
	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.							
	<ul style="list-style-type: none"> <li>▪ If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. <b>(select outcome 4)</b></li> <li>▪ If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. <b>(select outcome 4)</b></li> </ul>							
	<b>Stage 6: Decision</b>							
	<b>13.</b> 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: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.							
	<b>Outcome 2</b> – Minor adjustments to remove / mitigate adverse impact or advance 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 7</i>							X
	<b>Outcome 3</b> – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. 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. <b>(Explain this in 13a 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>13a.</b> If your EqIA is assessed as <b>outcome 3 or you have ticked 'yes' in Q12</b> , explain your justification with full reasoning to continue with your proposals.	The roads / pavements through the parks will not be affected. The proposals are needed to achieve the savings.						

## Stage 7: Improvement Action Plan

14. List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
<b>Disability &amp; Age</b>	Retention of Rapid Response teams to be able to respond to service requests relating to excessive littering, debris or fly tipping to allow for removal within the current SLA of 24 hours  Monitor deployment of mobile and amend work schedules to meet variable demand	The Collective system captures all service requests and is used to monitor the response time to rectify.  The retention of Rapid Response teams and flexible staff deployment	December 2015	Michael Wynne	
Socio Economic	Whilst the resource model to key parks will change there is still the capability to aspire to retaining Green Flag status at most of the current Green Flag Parks. Maintaining key major parks at disparate geographic locations will mitigate some perception and fitness implications. Existing booked sports facilities in parks will be maintained to existing standards  28% of responders have expressed concern over not locking park gates with a significant bias towards fear of crime	Monitor Green Flag success  Parks will be monitored for increases in crime, especially in terms of car parks where there is a greater likelihood of nuisance occurring	July 2015	Michael Wynne	

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## Stage 8 - Monitoring

The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.

15. How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? (*Also Include in Improvement Action Plan at Stage 7*)

As well as in house monitoring through the creation of random inspections via the Collective system, further monitoring of parks standards is undertaken by an independent external body annually.  
The Collective system captures all service requests and is used to monitor the response time to rectify.

<p><b>16.</b> How will the results of any monitoring be analysed, reported and publicised? <i>(Also include in Improvement Action Plan at Stage 7)</i></p>	<p>A full breakdown of performance, causes of litter, and class performance is provided as part of the external monitoring and assessment of cleansing performance. The classification of areas into zones is not rigid and, if data suggests that the classification of an area into a particular zone disproportionately affects one of the protected groups, this will be reviewed and appropriate adjustments made.</p>
<p><b>17.</b> Have you received any complaints or compliments about the proposals being assessed? If so, provide details.</p>	<p>Full consultation analysis to be completed</p>

**Stage 9: Public Sector Equality Duty**

**18.** How do your proposals contribute towards 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.  
(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>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>N/a</p>	<p>N/a</p>	<p>N/a</p>

**Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)**

**The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.**

<p><b>19.</b> Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?</p>		
<p>Signed: (Lead officer completing EqIA)</p>	<p>Mick Wynne</p>	<p>Signed: (Chair of DETG)</p> <p>Hanif Islam</p>
<p>Date:</p>	<p>14/01/2015</p>	<p>Date:</p>
<p>Date EqIA presented at the EqIA Quality Assurance Group</p>	<p>28/01/2015</p>	<p>Signature of ETG Chair</p> <p>PP Hanif Islam</p>

**Table 1: Parks Service Standards per designation type**

Parkland	Open Spaces
Hedge and shrub pruning up to twice a year	Hedge and shrub pruning up to twice a year
CURRENTLY UP TO 3 TIMES Leaf clearance once a year	CURRENTLY UP TO 3 TIMES Leaf clearance once a year
Empty litter bins once a week CURRENTLY EMPTIED TWICE WEEKLY ALONG WITH LITTER PICKING OF THE PARK, WHICH WILL ALSO REDUCE TO ONCE PER WEEK. THIS WILL ALSO APPLY TO DOG BINS IF EMPTYING OF DOG BINS COMES BACK IN HOUSE	Empty litter bins once a week CURRENTLY EMPTIED TWICE WEEKLY ALONG WITH LITTER PICKING OF THE PARK, WHICH WILL ALSO REDUCE TO ONCE PER WEEK. THIS WILL ALSO APPLY TO DOG BINS IF EMPTYING OF DOG BINS COMES BACK IN HOUSE
General inspection of playgrounds and infrastructure once every 3 months	General inspection of playgrounds and infrastructure once every 3 months
CURRENTLY INSPECTED MONTHLY	CURRENTLY INSPECTED MONTHLY
Strimming of high visibility boundary areas every 3 weeks during growing season (March to October depending on seasonal changes)	Strimming of high visibility <b>path boundaries</b> every 3 weeks during growing season (March to October depending on seasonal changes).
CURRENTLY CUT EVERY 3 WEEKS	CURRENTLY CUT EVERY 3 WEEKS
Grass cutting every 6 weeks	Grass cut once a year forage cut
CURRENTLY CUT EVERY 3 WEEKS	CURRENTLY CUT EVERY 3 WEEKS
Rake Play bark areas once a week	Rake Play bark areas once a week
Grass cutting every 6 weeks during growing season (March to October depending on seasonal changes)	Cut grass on park path and boundary every 3 weeks during growing season (March to October depending on seasonal changes)
CURRENTLY DONE ON A 3 WEEKLY CYCLE	CURRENTLY DONE ON A 3 WEEKLY CYCLE
Pond clearance once a month	Pond clearance every 3 months
Shrub and flower beds are mulched once a year	No mulching of beds
Mechanical sweeping once a month	

**Table 2: Parks by designation type**

Parkland	Open Spaces	Country Parks, Nature Reserves & Woodland
Alexandra Park	Brockhurst Corner	Bentley Priory
Bernays Gardens	Brockley Hill	Belmont Rattler
Byron Recreation Ground	Church Fields	Brewery Reservoir Open Space
Cedars O.S.	Chrutchurch Avenue Open Space	Church Farm
Centenary Park	Cuckoo Hill Open Space	Glenthorne
Chandos Recreation Ground	Croft	Grimsdyke Open Space
Harrow Recreation Ground	Elms Road Open Space	Harrow Weald Common
Harrow Weald Recreation Ground	Greenway	Pinner Park Farm
Hatch End Playing Fields	Grove Fields	Roxbourne Rough
Headstone Manor	Harrow Garden Village	Stanmore Common
Hooking Green	Kenton Recreation Ground	Stanmore Country Park
John Rummy	Lake Grove	
Lowlands Recreation Ground	Little Common Pinner	
Melbourne Ave	Little Common Stanmore	
Montesoles P.F.	Lynwood Close Open Space	
Pinner Memorial Park	Montrose Walk	
Priestmead Recreation Ground	Newton Ecology Park	
Queensbury Recreation Ground	Newton Park West	
Rayners Mead	Pinner Recreation Ground	
Roxbourne Park	Pinner Village Gardens	
Roxeth Recreation Ground	Ridgeway Playing Fields	
Saddlers Mead	River Pinn Open Space	
Shaftesbury P.F.	Streamside	

Parkland	Open Spaces	Country Parks, Nature Reserves & Woodland
Stanmore Marsh	Sylvia Avenue Open Space	
Stanmore Recreation Ground	Thackery Close Open Space	
Weald Village	Tookes Green	
West Harrow Recreation Ground	Whitchurch Playing Fields	
	Whitefriars Open Space	
	Woodlands	
	Yeading Walk	

Nb: Due to funding criteria, Canons Park will retain the current maintenance regimes.  
 Countryside Parks, Nature Reserves and Woodland already have separate maintenance regimes that are not affected by these proposals



# Appendix 1

## Consultees

Afghan Association of London (Harrow)	Harrow Bengalee Association	Pinner Jewish Football Club
Association of Senior Muslim Citizens	Harrow Equalities Centre	Stanmore Football Club
Gujarati Arya Association	Harrow Somali Cultural & Educational Association	Age Concern Harrow
Harrow Bengalee Association	Jaago Punjabi Women's Group	Harrow Mencap
Harrow Iranian Community Association (HICA)	Pinner Association	CAPRA Canons Park Residents Association
Harrow Tamil Association	Wealdstone Active Community	Harrow Nature Conservation Forum
Indian Association of Harrow	ADHD and Autism Support Harrow	Harrow St Mary's
Nepalese British Community UK	Mind in Harrow	Kenton Town FC
Pakistan Society of Harrow	National Osteoporosis Society Middlesex Group	Parkfield Football Club
Russian Immigrants Association	Rethink: Harrow Support Group	Parkfield Youth FC
The Harrow African Caribbean Association (HACAS)	Friends of Bentley Priory Nature Reserve	Pinner Albion FC
UK Asian Women's Conference (North London)	Friends of Canons Park	St Josephs Youth FC
Harrow in Business (HiB)	Friends of West Harrow Park	Stanmore Manor FC
Canons Community Association	Harrow Youth Parliament	Three Wishes Exiles
Harrow Association of Disabled People	Capable Communities Ltd.	Venceremos FC
Harrow in Leaf	The Wish Centre	APB FC
Middlesex Association for the Blind	The Stanmore Society	Lankians CC
Harrow Heritage Trust	Bessborough Cricket Club	Pinner Challengers CC
North West London Lesbian & Gay Group (NWLLG)	Harrow Rugby Football Club	Pinner Cricket Club
Harrow Civic Residents' Association (HCRA)	Harrow St. Mary's Youth Football Club	South Harrow CC
Hatch End Association	Pinner Cricket Club	Tamil Union CC
HFTRA (Harrow Federation of Tenants' & Residents' Associations)	Pinnstars Football Club	West Harrow CC
Harrow Association of Voluntary Service	Harrow Mencap	Yarl CC
Voluntary Action Harrow	Harrow Over 50 club	Youth Wing CC
Angolan Civic Communities Alliance (ACCA)	Harrow Community Transport	Cuiver Bowls Club
Harrow	Harrow Centre for Volunteering	Harrow Weald Bowls Club
British Afghan Women's Society	Harrow Volunteer Centre	Pinner Bowls Club
Harrow Association of Somali Voluntary Organisations (HASVO)	Harrow Women's Centre	Stanmore Bowls Club
	Headstone Manor Youth Football Club	Pinner & Grammarians Rugby Football Club
	Parkfield Youth Football Club	
	Pinner Albion Football Club	

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## Appendix 4: Highways Verge Grass Cutting

### Equality Impact Assessment (EqIA) Template

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 assessment. It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:	Tick ✓	Type of Decision:	Tick ✓
Transformation		Cabinet	✓
Capital		Portfolio Holder	
Service Plan		Corporate Strategic Board	
Other	✓	Other	
<b>Title of Project:</b>			
Highways verge grass cutting, moving from a three weekly to a six weekly cycle.			
<b>Directorate / Service responsible:</b>			
E&E			
<b>Name and job title of lead officer:</b>			
Mick Wynne			
<b>Name &amp; contact details of the other persons involved in the assessment:</b>			
David Corby, Andrew Smith, Sajni Durve			
<b>Date of assessment:</b>			
13/01/2015			
<b>Stage 1: Overview</b>			
<p><b>1. What are you trying to do?</b>            (Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p> <p>Harrow Pride currently undertakes cutting of grass verges to all Harrow managed highways on a 3 weekly cycle.</p> <p>The council currently delivers this service on a three week cycle from March to November although this can be affected by weather conditions. Clippings are left distributed evenly over the verge to compost down back into the soil. The objective is to extend of the cutting frequency to a 6 weekly cycle which will apply to all verges across the borough is anticipated to achieve financial savings within the current residential street services budget of £82,000.</p> <p>The reduction in cutting frequency will realise these savings through the removal of</p>			

3 posts from the current staffing establishment and associated vehicles.																							
2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)	Residents / Service Users	✓	Partners		Stakeholders																		
	Staff	✓	Age	✓	Disability																		
	Gender Reassignment		Marriage and Civil Partnership		Pregnancy and Maternity																		
	Race		Religion or Belief		Sex																		
	Sexual Orientation		Other																				
3. Is the responsibility shared with another directorate, authority or organisation? If so:	No.																						
<p><b>Stage 2: Evidence / Data Collation</b></p> <p>4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. 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; complaints etc. Where possible include data on the nine Protected Characteristics.</p> <p><b>(Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)</b></p>																							
Age (including carers of young/older people)	<p>It is unlikely that this proposal will have a significant on this characteristic as this is more an aesthetic matter. However, in the rare event that pedestrians need to cross and there isn't hard surfacing or a crossing nearby, elderly / vulnerable residents may find it difficult if they are faced with the option of longer grass verge for a significant distance to get to the nearest crossing. Borough wide 2011 census data (see data below) shows that Harrow has a fairly significant elderly population with 14.1% over the age of 65.</p> <p style="text-align: center;"><b><u>Borough – wide age structure statistics from 2011 census</u></b></p> <table border="1"> <thead> <tr> <th colspan="2"></th> <th colspan="2">Age Structure</th> <th colspan="2"></th> </tr> <tr> <th></th> <th>2011</th> <th>2011</th> <th>%</th> <th>2011</th> <th>2011</th> </tr> </thead> <tbody> <tr> <td>Harrow</td> <td>2011 Data</td> <td>Rank - National</td> <td></td> <td>Rank - National</td> <td>Rank - London</td> </tr> </tbody> </table>							Age Structure					2011	2011	%	2011	2011	Harrow	2011 Data	Rank - National		Rank - National	Rank - London
		Age Structure																					
	2011	2011	%	2011	2011																		
Harrow	2011 Data	Rank - National		Rank - National	Rank - London																		

All usual residents	239,056				
0 - 4	15,916	6.7	76	24	
5 - 7	9,007	3.8	40	14	
8 - 9	5,414	2.3	87	16	
10 - 14	14,590	6.1	96	9	
15	3,131	1.3	83	8	
16 - 17	6,604	2.8	34	3	
18 - 19	5,369	2.2	192	20	
20 - 24	16,066	6.7	89	25	
25 - 29	19,345	8.1	47	23	
30 - 44	53,358	22.3	45	30	
45 - 59	44,579	18.6	277	8	
60 - 64	12,010	5	301	8	
65 - 74	17,420	7.3	287	5	
75 - 84	11,659	4.9	283	5	
85 - 89	2,982	1.2	288	7	
90 & over	1,606	0.7	252	8	
Average Age (Mean)	37.6		287	8	
Median Age	36		284	8	

In 24% (20,323) of Harrow's households one person has a long-term health problem or disability including dependant and no dependent children (please see table below). This equates to a 10% value across the population. The Environment Consultation results indicate 14% of respondents declaring a disability or health problem of which 9% refer to mobility issues.

It is unlikely that this proposal will have a significant on this characteristic as this is more an aesthetic matter. However, in the rare event that pedestrians need to cross and there isn't hard surfacing or a crossing nearby, residents with visual and/or mobility impairments may find it difficult if they are faced with the option of longer grass verge for a significant distance to get to the nearest crossing.

Disability (including carers of disabled people)

**Adults not in Employment and Dependent Children and Persons with Long-term Health Problem or**

## Disability for all Households

Harrow	2011	2011	2011	2011	2011
All households : 84,268	Data		%	Rank - National	Rank - London
<b>Households with:</b>					
No adults in employment with dependent children	3,675	4	116	24	
No adults in employment with no dependent children	18,788	22	324	15	
Dependent children of all ages	30,670	36	6	5	
Dependent children aged 0 - 4	12,435	15	24	13	
One person in household with a long-term health problem or disability: With dependent children	5,038	6	20	6	
One person in household with a long-term health problem or disability: No dependent children	15,285	18	293	10	
One or more person with a limiting long-term illness	N/A	N/A	N/A	N/A	N/A

No data collected. Unlikely to have an adverse disproportionate effect.

Gender Reassignment

No data collected. Unlikely to have an adverse disproportionate effect.

94 Marriage / Civil Partnership

No data collected. Unlikely to have an adverse disproportionate effect.

Pregnancy and Maternity

No data collected. Unlikely to have an adverse disproportionate effect.

Race

No data collected. Unlikely to have an adverse disproportionate effect.

Religion and Belief

No data collected. Unlikely to have an adverse disproportionate effect.

Sex / Gender

No data collected. Unlikely to have an adverse disproportionate effect.

Sexual Orientation

No data collected. Unlikely to have an adverse disproportionate effect.

Socio Economic

5. What consultation have you undertaken on your proposals?

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
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<p>The consultation was carried out over the period 11<sup>th</sup> September 2014 to 8<sup>th</sup> November, 2014.</p> <p>The consultation has given all residents the opportunity to respond.</p>	<p>The consultation has been promoted widely through posters, articles in the press and the web.</p> <p>The consultation has had the most engagement in recent years and a variety of mechanisms to engage residents were taken forward:</p> <p>100,000 Take part Booklets developed with survey distributed widely to stakeholder distribution list and through Harrow People</p> <p>6000 booklets distributed as part of events</p> <p>Specific web pages relating to the consultation and online web survey</p> <p>7 Roadshows and 10 Drop in sessions held across Harrow and attendance at 50 Community Group meetings across Harrow</p>	<p><b>Survey Responses</b></p> <p>Specifically in relation to impacts of the proposed changes in the survey residents were specifically asked which impacts would affect them most as an individual/family and a further question asking which proposals would impact the community as a whole. The following were fed back in order as having the most impact:</p> <p>E&amp;E sections include <i>Impact on you and your family:</i></p> <ol style="list-style-type: none"> <li>1. Introducing a separate weekly food waste collection and charge for fortnightly collections of garden waste</li> <li>2. Switch off some streetlights, or reduce the hours that they are on for</li> </ol> <p><i>Impact on the community as a whole</i></p> <ol style="list-style-type: none"> <li>1. Introducing a separate weekly food waste collection and charge for fortnightly collections of garden waste</li> <li>2. Changes to parks maintenance</li> <li>3. Relocation of beat sweepers from secondary shopping centres</li> <li>4. Reduction in grass verge cutting</li> </ol> <p>The impact on the protected characteristics for each of these proposals has not been specifically collected however this will be explored in the individual Equality Impact Assessments if proposals are taken forward for further consideration.</p>	<p>consultation? (This may include further consultation with the affected groups, revising your proposals).</p>
<p>Based on the findings from this consultation elected members will be making a decision on the proposals that are to be taken forward for individual consultation. All proposals that are being taken forward to consultation will have their own individual detailed EqIA.</p> <p>Councillors have confirmed that they will be taking forward a campaign for a fairer grant for Harrow.</p>			

resulting in 361 face to face in depth conversations

Translated documents on the web and in hard copy

Easy read of the consultation booklet and survey

Information on Facebook, Twitter and 4 responses received by video

However the proposals that have been highlighted by the community as ones with the most impact that will have an obvious impact on groups with protected characteristics because they are users of their services are:

- Cutting some support provided to older and disabled people in Harrow under the Supporting People programme and
- Close or reduce some of the Council's early support services to families, including Children's Centres.

**Formal Letters**

23 formal responses were received which included feedback that some of the proposals could have impacts on groups that sit within the protected characteristics. These letters are not related to Environment proposals

**Petitions**

15 Petitions were received and this included the following in relation to Environmental services:

- 1 petition about locking of park gates with 108 signatures

**Harrow Youth Parliament**

The Youth Parliament tailored their own survey in response to Take Part which was asking whether young people agreed with proposals and therefore no feedback on impact. There were 495 responses received by the Council. The young people also held a debate and within this there was some concern relating to closure of libraries as used by young people and people to avoid isolation.



**6.** What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?

List the Title of reports / documents and websites here.

### Stage 3: Assessing Potential Disproportionate Impact

**7.** 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, continue with the rest of the template.

▪ **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA  
It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

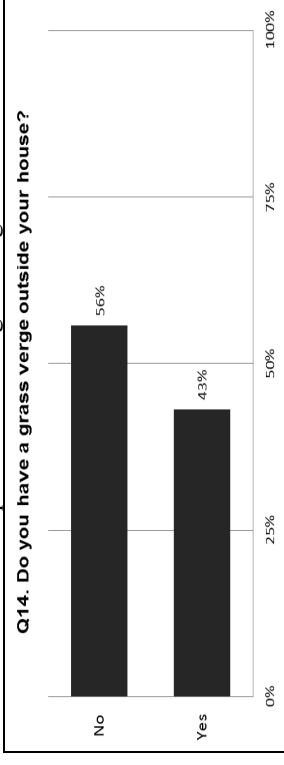
**NO** - If you have ticked 'No' to all of the above, then go to **Stage 6**

▪ Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

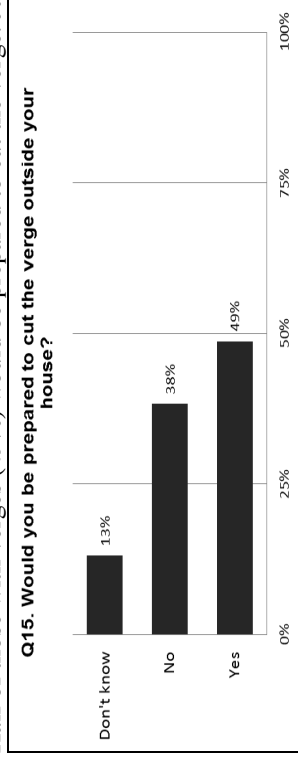
## Stage 4: Collating Additional data / Evidence

8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 4, include this evidence, including any data, statistics, titles of documents and website links here)

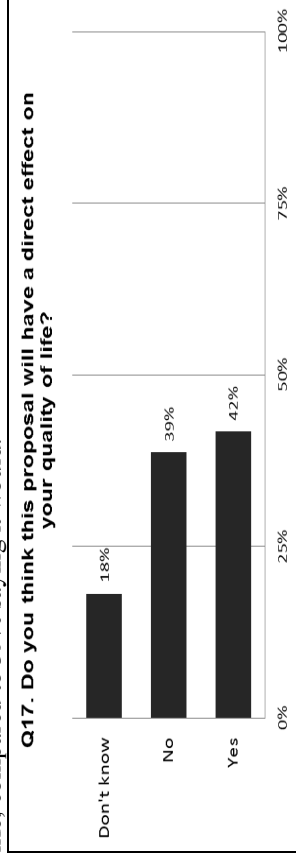
Around 4 out of 10 respondents have a grass verge outside their house (43%).



Half of those with verges (49%) would be prepared to cut the verge. Just over a third (38%) said no.

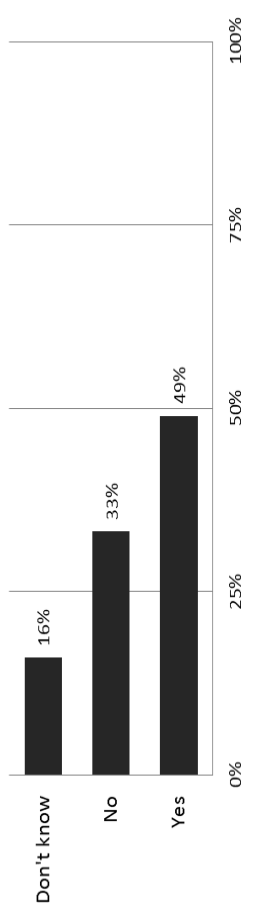


When asked about impact on quality of life from this proposal, 42% said it would impact their quality of life, compared to 39% saying it would.



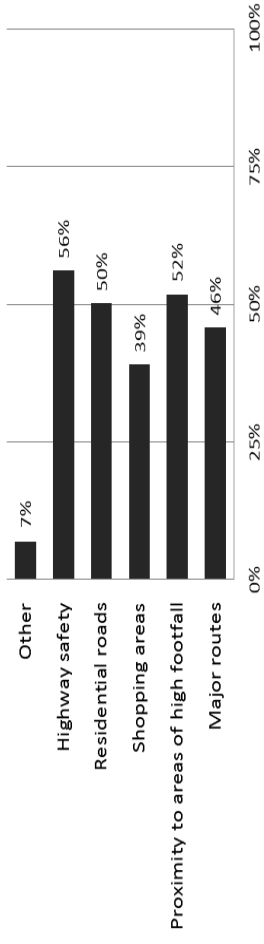
Respondents were asked their views on the introduction of different cutting cycles for different verges. Half of respondents (49%) agreed with this suggestion.

**Q19. Rather than cutting all verges at the same frequency, do you think we should introduce different cutting cycles for different verges (e.g. cut those on major routes more often than those on rural roads)?**



When considering this prioritisation, highway safety was the most frequent response (56%), followed by proximity to areas of high footfall (52%).

**Q20. What factors do you think needs to be a determining factor in prioritising verges for cutting?**



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

<p>Who was consulted?</p>	<p>What consultation methods were used?</p>	<p>What do the results show about the impact on different groups / Protected Characteristics?</p>	<p>What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).</p>
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Community Champions  
Housing Tenants  
Key Community groups

An online survey supported by self-completion, plus hard copy questionnaires available at local libraries. The Community Engagement team publicised the web-link through the Community Champion network and key community organisations as well as publicising it on the Harrow website, events, and libraries. A sample of 520 has been achieved to date

The survey is around 15 minutes in length, comprised of a mix of pre-coded and open ended questions.

Members of staff were advised of the proposals that had staff impacts prior to the commencement of the Take Part and Cabinet reports proposing savings and took part in the Take Part Employee consultation. In addition, Trade Union colleagues have been given briefings prior to each Cabinet meeting agenda publication.

Over 50% of respondents consider the current service to be good or better.

Of those who rated it poor or very poor, the majority cited general littering (97%) followed by flytipping (42%) as the main reason for that rating

There will be a staff impact through the deletion of seven posts from the establishment. These posts are currently filled by agency workers so there will be no reduction in the number of permanent staff or redundancy but the reduction in posts may have an impact on remaining staff.

There is also a wider impact on staff across the Council as the deletion of full time equivalent posts reduces the redeployment opportunities to displaced staff as the organisation progress its change programme.

Consultation feedback has identified potential priorities for any targeted zonal cutting regimes if required

Socio-economic and health impacts will be monitored using the Action Plans in the EqIAs

E&E will work with the corporate Organisational Development team in mitigating this impact

## Stage 5: Assessing Impact and Analysis

10. What does your evidence 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	Adverse	Positive	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur. <b>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9</b>	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 7)
Age (including carers of young/older people)	✓	✓	Longer grass could potentially cause a nuisance for residents, also may be hidden objects in longer grass.  Impact on staff is a reduction in numbers – but does not disproportionately affect one or more protected characteristic.	Due to the fact that pedestrians are not expected to be walking on verges there is no direct implications  The potential negative impacts are limited to aesthetics.  Monitor Service Requests through the Council's 'Collective' computer system which is used to monitor the queries and response time to rectify.
101 Disability (including carers of disabled people)	✓		Longer grass could potentially affect mobility for people with mobility and visual impairments.  Impact on staff is a reduction in numbers – but does not disproportionately affect one or more protected characteristic.	Due to the fact that pedestrians are not expected to be walking on verges there is no direct implications  The potential negative impacts are limited to aesthetics.  Monitor Service Requests through the Council's 'Collective' computer system which is used to monitor the queries and response time to rectify.
Gender			No disproportionate adverse effect.	
Reassignment			No disproportionate adverse effect.	
Marriage and Civil Partnership			No disproportionate adverse effect.	
Pregnancy and Maternity			No disproportionate adverse effect.	
Race			No disproportionate adverse effect.	
Religion or Belief			No disproportionate adverse effect.	
Sex			No disproportionate adverse effect.	
Sexual orientation			No disproportionate adverse effect.	

<p><b>11. Cumulative Impact</b> – 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?</p>		Yes	No	X					
<p>If yes, which Protected Characteristics could be affected and what is the potential impact?</p> <p><b>11a. Any Other Impact</b> – 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?</p>		Yes	No	X					
<p>If yes, what is the potential impact and how likely is to happen?</p>		If verges are left untidy, this could devalue surrounding properties.							
<p><b>12.</b> Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged? <b>(Please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act) available on Harrow HUB/Equalities and Diversity/Policies and Legislation</b></p>									
	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
1	X	X	X	X	X	X	X	X	X
2									
<p>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)</p>									
<p>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.</p>									
<ul style="list-style-type: none"> <li>▪ If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. <b>(select outcome 4)</b></li> <li>▪ If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. <b>(select outcome 4)</b></li> </ul>									
<p><b>Stage 6: Decision</b></p>									
<p><b>13.</b> Please indicate which of the following statements best describes the outcome of your EqIA ( ✓ tick one box only)</p>									
<p><b>Outcome 1</b> – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.</p>								X	
<p><b>Outcome 2</b> – Minor adjustments to remove / mitigate adverse equality have been identified by the EqIA. <i>List</i></p>									

**the actions you propose to take to address this in the Improvement Action Plan at Stage 7**

<b>Outcome 3</b> – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. 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. <b>(Explain this in 13a 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>13a.</b> If your EqIA is assessed as <b>outcome 3 or you have ticked 'yes' in Q12</b> , explain your justification with full reasoning to continue with your proposals.

**Stage 7: Improvement Action Plan**

14. List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.					
Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
103 <b>Accessibility &amp; Age</b> Possibility that the increased verge cutting frequency may affect appearance of streets and people with other mobility impairments and/or those with visual impairments	Monitor deployment of mobile and amend work schedules to meet variable demand. Monitor Service Requests through the Council's 'Collective' computer system which is used to monitor the queries and response time to rectify.	The Collective system captures all service requests and is used to monitor the response time to rectify.		Michael Wynne	

**Stage 8 - Monitoring**

The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.

15. How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	As well as in house monitoring through the creation of random inspections via the Collective system, further monitoring of street cleansing performance is undertaken by an independent external body on 3 occasions per year.
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<p><b>16.</b> How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>A full breakdown of performance, causes of litter, and class performance is provided as part of the external monitoring and assessment of cleansing performance. This will be reviewed and appropriate adjustments made.</p>	
<p><b>17.</b> Have you received any complaints or compliments about the proposals being assessed? If so, provide details.</p>	<p>Full consultation analysis to be completed</p>	
<p><b>Stage 9: Public Sector Equality Duty</b></p>		
<p><b>18.</b> How do your proposals contribute towards 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>N/a</p>	<p>N/a</p>	<p>N/a</p>

**Stage 10 - Organisational sign off (to be completed by Chair of Departmental Equalities Task Group)**  
**19. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?**

<p>Signed: (Lead officer completing EqIA)</p>	<p>Mick Wynne</p>	<p>Signed: (Chair of DETG)</p> <p>Hanif Islam</p>
<p>Date:</p>	<p>13/01/2015</p>	<p>Date:</p>
<p>Date EqIA presented at the EqIA Quality Assurance Group</p>	<p>28/01/2015</p>	<p>Signature of ETG Chair</p> <p>PP Hanif Islam</p>



# Appendix 1

## Consultees

Afghan Association of London (Harrow)	Jaago Punjabi Women's Group	Parkfield Football Club
Association of Senior Muslim Citizens	Pinner Association	Parkfield Youth FC
Gujarati Arya Association	Wealdstone Active Community	Pinner Albion FC
Harrow Bengalee Association	ADHD and Autism Support Harrow	St Josephs Youth FC
Harrow Iranian Community Association (HICA)	Mind in Harrow	Stanmore Manor FC
Harrow Tamil Association	National Osteoporosis Society Middlesex Group	Three Wishes Exiles
Indian Association of Harrow	Rethink: Harrow Support Group	Venceremos FC
Nepalese British Community UK	Friends of Bentley Priory Nature Reserve	APB FC
Pakistan Society of Harrow	Friends of Canons Park	Lankians CC
Russian Immigrants Association	Friends of West Harrow Park	Pinner Challengers CC
The Harrow African Caribbean Association (HACAS)	Harrow Youth Parliament	Pinner Cricket Club
UK Asian Women's Conference (North London)	Capable Communities Ltd.	South Harrow CC
Harrow in Business (HiB)	The Wish Centre	Tamil Union CC
Canons Community Association	The Stanmore Society	West Harrow CC
Harrow Association of Disabled People	Bessborough Cricket Club	Yarl CC
Harrow in Leaf	Harrow Rugby Football Club	Youth Wing CC
Middlesex Association for the Blind	Harrow St. Mary's Youth Football Club	Culver Bowls Club
Harrow Heritage Trust	Pinner Cricket Club	Harrow Weald Bowls Club
North West London Lesbian & Gay Group (NWLLG)	Pinnstars Football Club	Pinner Bowls Club
Harrow Civic Residents' Association (HCRA)	Harrow Mencap	Stanmore Bowls Club
Hatch End Association	Harrow Over 50 club	Pinner & Grammarians Rugby Football Club
HFTRA (Harrow Federation of Tenants' & Residents' Associations)	Harrow Community Transport	
Harrow Association of Voluntary Service Voluntary Action Harrow	Harrow Centre for Volunteering	
Angolan Civic Communities Alliance (ACCA) Harrow	Harrow Volunteer Centre	
British Afghan Women's Society	Harrow Women's Centre	
Harrow Association of Somali Voluntary Organisations (HASVO)	Headstone Manor Youth Football Club	
Harrow Bengalee Association	Parkfield Youth Football Club	
Harrow Equalities Centre	Pinner Albion Football Club	
Harrow Somali Cultural & Educational Association	Pinner Jewish Football Club	
	Stanmore Football Club	
	Age Concern Harrow	
	Harrow Mencap	
	CAPRA Canons Park Residents Association	
	Harrow Nature Conservation Forum	
	Harrow St Mary's	
	Kenton Town FC	

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## Appendix 5: Garden Waste

### Equality Impact Assessment (EqIA) Template

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 assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:	Tick ✓	Type of Decision:	Tick ✓
Transformation		Cabinet	✓
Capital		Portfolio Holder	
Service Plan		Corporate Strategic Board	
Other	✓	Other	
<p><b>Title of Project:</b> Change mixed organic waste collection system with separate collection of food waste and introduce charges for garden waste from 1st October 2015.</p>			
<p>107 rectorate / Service responsible: E&amp;E</p>			
<p>Name and job title of lead officer: Alan Whiting</p>			
<p>Name &amp; contact details of the other persons involved in the assessment: David Corby, Sajni Durve</p>			
<p>Date of assessment: 14/01/2015</p>			
<p><b>Stage 1: Overview</b></p>			
<p><b>1. What are you trying to do?</b> (Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p>		<p>The proposal is to alter the current garden waste recycling collection to a chargeable service. The introduction of charges for garden waste collections will enable protecting of key front line services such as social care. A number of Boroughs currently charge for this service and it is expected that more will follow in the near future etc. The new proposal will change the brown (organic waste) bin system to a separate free collection of food waste and a charged collection for garden waste. Provision of a weekly food collection only to the 74,000 households the container will collect food waste separately for disposal to an AD facility. <b>Before introduction all users will receive a letter detailing the changes. Any language barriers will be mitigated by a well-designed and flexible communications</b></p>	

strategy and action plans put in place.					
Residents / Service Users	Partners	Stakeholders			
Staff	✓	Disability	✓		✓
Gender Reassignment		Pregnancy and Maternity			✓
Race		Sex			
Sexual Orientation					
<p><b>2.</b> Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</p>					
<p><b>3.</b> Is the responsibility shared with another directorate, authority or organisation? If so:</p> <ul style="list-style-type: none"> <li>Who are the partners?</li> <li>Who has the overall responsibility?</li> <li>How have they been involved in the assessment?</li> </ul>					

### Stage 2: Evidence / Data Collation

**4.** What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the action below. 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; complaints etc. Where possible include data on the nine Protected Characteristics.

(Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)

Borough wide 2011 census data (see data below) shows that Harrow has a fairly significant elderly population with 14.1% over the age of 65. Pensioners on low income may have difficulty financing the new paid-for service. There may be difficulty for older people with mobility impairments and/or impaired vision to travel to the CA site.

**Borough – wide age structure statistics from 2011 census**

<b>Harrow</b>	<b>2011 Data</b>	<b>2011 %</b>	<b>2011 Rank - National</b>
All usual residents	239,056		
0 - 4	15,916	6.7	76
5 - 7	9,007	3.8	40
8 - 9	5,414	2.3	87
10 - 14	14,590	6.1	96
15	3,131	1.3	83
16 - 17	6,604	2.8	34
18 - 19	5,369	2.2	192
20 - 24	16,066	6.7	89
25 - 29	19,345	8.1	47
30 - 44	53,358	22.3	45
45 - 59	44,579	18.6	277
60 - 64	12,010	5	301
65 - 74	17,420	7.3	287
75 - 84	11,659	4.9	283
85 - 89	2,982	1.2	288
90 & over	1,606	0.7	252
Average Age (Mean)	37.6		287
Median Age	36		284

Age (including carers of young/older people)

109

In 24% (20,323) of Harrow's households one person has a long-term health problem or disability including dependant and no dependent children (please see table below). This equates to a 10% value across the population. The Environment Consultation results indicate 14% of respondents declaring a disability or health problem of which 9% refer to mobility issues.

Disability (including carers of disabled people)

If residents can't afford garden waste fees, the only other option would be to drop waste at CA site. This may prove difficult for residents with mobility and visual impairments.

**Adults not in Employment and Dependent Children and Persons with Long-term Health Problem or Disability for all Households**

<b>Harrow</b>	<b>2011</b>	<b>2011</b>	<b>2011</b>	<b>2011</b>	<b>2011</b>
	Data	%	Rank - National	Rank - London	
All households	84,268				
<b>Households with:</b>					
No adults in employment with dependent children	3,675	4	116	24	
No adults in employment with no dependent children	18,788	22	324	15	
Dependent children of all ages	30,670	36	6	5	
Dependent children aged 0 - 4	12,435	15	24	13	
One person in household with a long-term health problem or disability: With dependent children	5,038	6	20	6	
One person in household with a long-term health problem or disability: No dependent children	15,285	18	293	10	
One or more person with a limiting long-term illness	N/A	N/A	N/A	N/A	N/A

No data collected. Unlikely to have an adverse disproportionate effect.

No data collected. Unlikely to have an adverse disproportionate effect.

No full data held however a recent survey indicates that 2% of responders have been pregnant and / or on maternity leave during the past 2 years. There may be difficulty traveling to the CA site.

If residents can't afford garden waste fees, the only other option would be to drop waste at CA site. This may prove difficult for residents affected by pregnancy and maternity.

Data collected. Unlikely to have an adverse disproportionate effect.

Gender Reassignment	No data collected. Unlikely to have an adverse disproportionate effect.
Marriage / Civil Partnership	No data collected. Unlikely to have an adverse disproportionate effect.
Pregnancy and Maternity	No full data held however a recent survey indicates that 2% of responders have been pregnant and / or on maternity leave during the past 2 years. There may be difficulty traveling to the CA site.  If residents can't afford garden waste fees, the only other option would be to drop waste at CA site. This may prove difficult for residents affected by pregnancy and maternity.
Race	Data collected. Unlikely to have an adverse disproportionate effect.

Religion and Belief	Data collected. Unlikely to have an adverse disproportionate effect.
Sex / Gender	Data collected. Unlikely to have an adverse disproportionate effect.
Sexual Orientation	No data collected. Unlikely to have an adverse disproportionate effect.
Socio Economic	Some residents may not be able to afford the new proposed fees and therefore may need to travel to the CA site to dispose of garden waste. This may prove difficult for those who cannot afford the cost of travelling to the CA site. Furthermore, this may lead to an increased disposal of waste on streets which could lead to fly tipping, increased crime perception, infestations, blocking access and devaluing areas.

**5. What consultation have you undertaken on your proposals?**

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? (This may include further consultation with the affected groups, revising your proposals).
<p>The consultation was carried out over the period 11<sup>th</sup> September 2014 to 8<sup>th</sup> November, 2014.</p> <p>→ The consultation has given all residents the opportunity to respond.</p>	<p>The consultation has been promoted widely through posters, articles in the press and the web.</p> <p>The consultation has had the most engagement in recent years and a variety of mechanisms to engage residents were taken forward: 100,000 Take part Booklets developed with survey distributed widely to stakeholder distribution list and through Harrow People 6000 booklets distributed as part of events Specific web pages relating to the consultation</p>	<p><b>Survey Responses</b></p> <p>Specifically in relation to impacts of the proposed changes in the survey residents were specifically asked which impacts would affect them most as an individual/family and a further question asking which proposals would impact the community as a whole. The following were fed back in order as having the most impact: E&amp;E sections include <i>Impact on you and your family:</i></p> <ol style="list-style-type: none"> <li>1. Introducing a separate weekly food waste collection and charge for fortnightly collections of garden waste they are on for</li> <li>2. Switch off some streetlights, or reduce the hours that they are on for</li> </ol> <p><i>Impact on the community as a whole</i></p> <ol style="list-style-type: none"> <li>1. Introducing a separate weekly food waste collection and charge for fortnightly collections of garden waste</li> <li>2. Changes to parks maintenance</li> <li>3. Relocation of beat sweepers from secondary shopping centres</li> <li>4. Reduction in grass verge cutting</li> </ol>	<p>Based on the findings from this consultation elected members will be making a decision on the proposals that are to be taken forward for individual consultation. All proposals that are being taken forward to consultation will have their own individual detailed EqIA.</p> <p>Councillors have confirmed that they will be taking forward a campaign for a fairer grant for Harrow.</p>



	<p>and online web survey</p> <p>7 Roadshows and 10 Drop in sessions held across Harrow and attendance at 50 Community Group meetings across Harrow resulting in 361 face to face in depth conversations</p> <p>Translated documents on the web and in hard copy</p> <p>Easy read of the consultation booklet and survey</p> <p>Information on Facebook, Twitter and 4 responses received by video</p>	<p>The impact on the protected characteristics for each of these proposals has not been specifically collected however this will be explored in the individual Equality Impact Assessments if proposals are taken forward for further consideration. However the proposals that have been highlighted by the community as ones with the most impact that will have an obvious impact on groups with protected characteristics because they are users of their services are:</p> <ul style="list-style-type: none"> <li>- Cutting some support provided to older and disabled people in Harrow under the Supporting People programme and</li> <li>- Close or reduce some of the Council's early support services to families, including Children's Centres.</li> </ul> <p><b>Formal Letters</b></p> <p>23 formal responses were received which included feedback that some of the proposals could have impacts on groups that sit within the protected characteristics. These letters are not related to Environment proposals</p> <p><b>Petitions</b></p> <p>No petitions were received in respects of this proposal.</p> <p><b>Harrow Youth Parliament</b></p> <p>The Youth Parliament tailored their own survey in response to Take Part which was asking whether young people agreed with proposals and therefore no feedback on impact. There were 495 responses received by the Council. The young people also held a debate and within this there was some concern relating to closure of libraries as used by young people and people to avoid isolation.</p>	
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**6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?**

None

List the Title of reports / documents and websites here.

### Stage 3: Assessing Potential Disproportionate Impact

**7. 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, continue with the rest of the template.

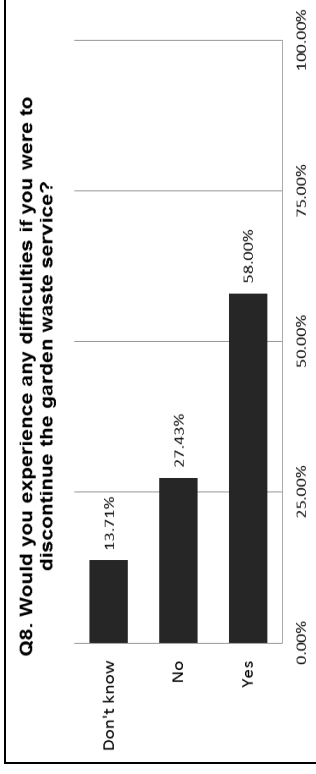
**Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA  
It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

**NO** - If you have ticked 'No' to all of the above, then go to **Stage 6**

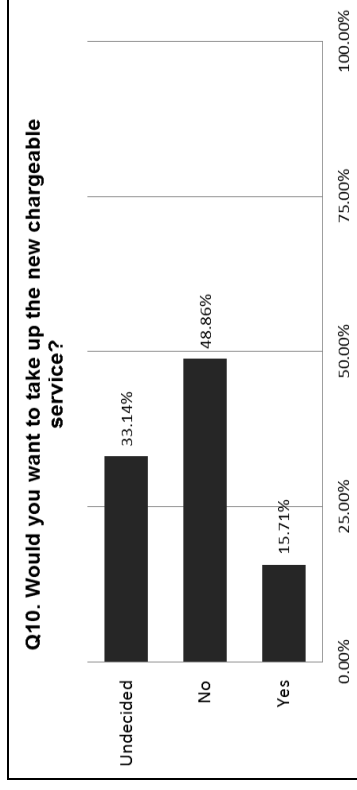
Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

## Stage 4: Collating Additional data / Evidence

When asked if difficulties would be experienced if we were to discontinue the garden waste service, just over half (58%), said yes. (There is a high proportion of over 65s in this group)



When asked if they would take up the new chargeable service, almost half of the respondents (49%) said no, with a third undecided, and 16% saying yes. (There is a high proportion of under 45s white and asian in the NO group)

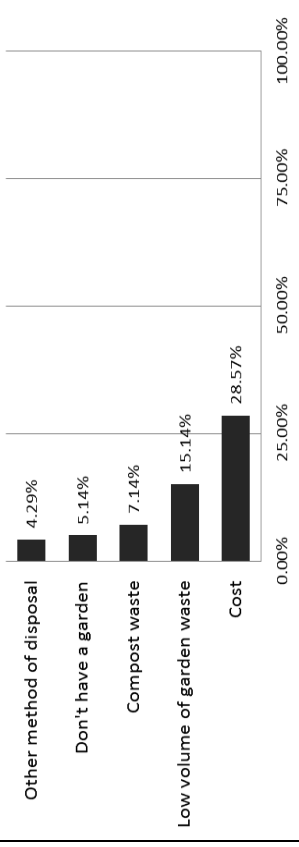


When asked why they wouldnt subscribe to this service, cost was the most requent response, made by 29% of the sample. (High proportion of under 45s)

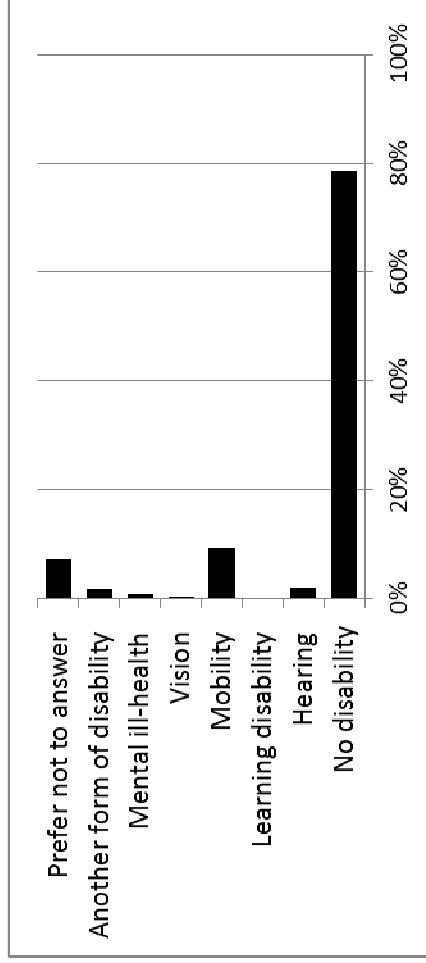
8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage

110 include this evidence, including any data, statistics, titles of documents and website links here)

**Q11. Why wouldn't you subscribe to the service?**



**Are your day-to-day activities limited because of a health problem or disability which has lasted or is expected to last at least 12 months?**



This equates to a 10% value across the population. The Environment Consultation results indicate 14% of respondents declaring a disability or health problem of which 9% refer to mobility issues.

**9. 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? (This may include further consultation)

Community Champions Housing Tenants  Key Community groups	An online survey supported by self-completion, plus hard copy questionnaires available at local libraries. The Community Engagement team publicised the web-link through the Community Champion network and key community organisations as well as publicising it on the Harrow website, events, and libraries. A sample of 520 has been achieved to date  The survey is around 15 minutes in length, comprised of a mix of pre-coded and open ended questions.	Over 50% of respondents consider the current service to be good or better.  Of those who rated it poor or very poor, the majority cited general littering (97%) followed by flytipping (42%) as the main reason for that rating  The results of the consultation underline the need for a comprehensive communications campaign relating to the service, careful consideration of a concessionary charging scheme and scaleability of service provision to meet an uncertain level of demand. All of these factors will be considered during the development and implementation of the scheme	with the affected groups, revising your proposals).
<b>Stage 5: Assessing Impact and Analysis</b>			
<b>10.</b> What does your evidence 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	Adverse	Positive	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur. <b>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9</b>	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 7)
Age (including carers of young/older people)	✓	✓	Pensioners on low income may have difficulty financing the new paid-for service. The only other option would be to drop waste at CA site. This may prove difficult for elderly / vulnerable residents.	Implement concessionary rates for low income retirees. Review operation of the scheme to explicitly consider mitigations for low income groups and update EQIA
Disability (including carers of disabled people)	✓		If residents can't afford garden waste fees, the only other option would be to drop waste at CA site. This may prove difficult for residents with mobility and visual impairments.	Implement concessionary rates for low income residents with impairments. Review operation of the scheme to explicitly consider mitigations for low income groups and update EQIA
Gender Reassignment			No disproportionate adverse impact.	
Marriage and Civil Partnership			No disproportionate adverse impact.	
Pregnancy and Maternity	✓		If residents can't afford garden waste fees, the only other option would be to drop waste at CA site. This may prove difficult for pregnant residents.	This is a low volume group. Monitor impact

Race				No disproportionate adverse impact.			
Religion or Belief				No disproportionate adverse impact.			
Sex				No disproportionate adverse impact.			
Sexual orientation				No disproportionate adverse impact.			
Socio Economic				There may be a general impact regarding the ability to afford the service. Although age and disability are identified there may be other groups disadvantaged			Review operation of the scheme to explicitly consider mitigations for low income groups and update EQIA
				Change in working practice may have implications to staff working practice			Undertake Health and Safety and method of work assessment prior to go-live Ensure correct training is delivered to staff
<b>11. Cumulative Impact</b> – 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		<b>X</b>
<i>If yes, which Protected Characteristics could be affected and what is the potential impact?</i>							
<b>11a. Any Other Impact</b> – Considering what else is happening within the Council and				Yes	No		<b>X</b>



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

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

**12.** Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic 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) available on Harrow HUB/Equalities and Diversity/Policies and Legislation*

	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			X				
No			X	X		X	X	X	X

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)

**13.** 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 6: Decision

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

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

**Outcome 2** – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. *List the actions you propose to take to address this in the Improvement Action Plan at Stage 7*

**Outcome 3** – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. 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 13a below)**

X

<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>13a.</b> If your EqIA is assessed as <b>outcome 3 or you have ticked 'yes' in Q12</b> , explain your justification with full reasoning to continue with your proposals.	The results of the consultation underline the need for a comprehensive communications campaign relating to the service, careful consideration of a concessionary charging scheme and scalability of service provision to meet an uncertain level of demand. All of these factors will be considered during the development and implementation of the scheme

### Stage 7: Improvement Action Plan

**14.** List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
Disability Age	Introduction of concessionary pricing	Service take-up	October 2015	Alan Whiting	
Pregnancy and Maternity	Monitor impact to this group	Monitor through the 'Waste Collector' computer system	October 2015	Alan Whiting	
Socio Economic	Review EQIA to clarify policy of introduction of concessionary pricing for the service	Delivery of revised EQIA	April 2015	Dave Corby	

### Stage 8 - Monitoring

The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.

<p><b>15.</b> How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>In house monitoring through Service requests from the 'Waste Collector' computer system and Council complaints.</p>
<p><b>16.</b> How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>Internal monitoring</p>
<p><b>17.</b> Have you received any complaints or compliments about the proposals being assessed? If so, provide details.</p>	<p>Full consultation analysis to be completed</p>

**Stage 9: Public Sector Equality Duty**

**18.** How do your proposals contribute towards 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.  
(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>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>1 2 3</p>	<p>N/a</p>	<p>N/a</p>

**Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)**

**The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.**

<p><b>19.</b> Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?</p>		
<p>Signed: (Lead officer completing EqIA)</p>	<p>Alan Whiting</p>	<p>Signed: (Chair of DETG)</p> <p>Hanif Islam</p>
<p>Date:</p>	<p>14/01/2015</p>	<p>Date:</p>
<p>Date EqIA presented at the EqIA Quality Assurance Group</p>	<p>28/01/2015</p>	<p>Signature of ETG Chair</p> <p>PP Hanif Islam</p>



# Appendix 1

## Consultees

Afghan Association of London (Harrow)	Wealdstone Active Community	Stanmore Manor FC
Association of Senior Muslim Citizens	ADHD and Autism Support Harrow	Three Wishes Exiles
Gujarati Arya Association	Mind in Harrow	Venceremos FC
Harrow Bengalee Association	National Osteoporosis Society Middlesex Group	APB FC
Harrow Iranian Community Association (HICA)	Rethink: Harrow Support Group	Lankians CC
Harrow Tamil Association	Friends of Bentley Priory Nature Reserve	Pinner Challengers CC
Indian Association of Harrow	Friends of Canons Park	Pinner Cricket Club
Nepalese British Community UK	Friends of West Harrow Park	South Harrow CC
Pakistan Society of Harrow	Harrow Youth Parliament	Tamil Union CC
Russian Immigrants Association	Capable Communities Ltd.	West Harrow CC
The Harrow African Caribbean Association (HACAS)	The Wish Centre	Yarl CC
UK Asian Women's Conference (North London)	The Stanmore Society	Youth Wing CC
Harrow in Business (HiB)	Bessborough Cricket Club	Cuiver Bowls Club
Canons Community Association	Harrow Rugby Football Club	Harrow Weald Bowls Club
Harrow Association of Disabled People	Harrow St. Mary's Youth Football Club	Pinner Bowls Club
Harrow in Leaf	Pinner Cricket Club	Stanmore Bowls Club
Middlesex Association for the Blind	Pinnstars Football Club	Pinner & Grammarians Rugby Football Club
Harrow Heritage Trust	Harrow Mencap	
North West London Lesbian & Gay Group (NWLGG)	Harrow Over 50 club	
Harrow Civic Residents' Association (HCRA)	Harrow Community Transport	
Hatch End Association	Harrow Centre for Volunteering	
HFTRA (Harrow Federation of Tenants' & Residents' Associations)	Harrow Volunteer Centre	
Harrow Association of Voluntary Service	Harrow Women's Centre	
Voluntary Action Harrow	Headstone Manor Youth Football Club	
Angolan Civic Communities Alliance (ACCA)	Parkfield Youth Football Club	
Harrow	Pinner Albion Football Club	
British Afghan Women's Society	Pinner Jewish Football Club	
Harrow Association of Somali Voluntary Organisations (HASVO)	Stanmore Football Club	
Harrow Bengalee Association	Age Concern Harrow	
Harrow Equalities Centre	Harrow Mencap	
Harrow Somali Cultural & Educational Association	CAPRA Canons Park Residents Association	
Jaago Punjabi Women's Group	Harrow Nature Conservation Forum	
Pinner Association	Harrow St Mary's	
	Kenton Town FC	
	Parkfield Football Club	
	Parkfield Youth FC	
	Pinner Albion FC	
	St Josephs Youth FC	

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## APPENDIX 6 – PROPOSED PARKS MAINTENANCE SCHEDULE

### ENVIRONMENT AND ENVIRONMENT PROPOSED PARKS MAINTENANCE SCHEDULE

**Table 1: Parks Service Standards per designation type**

Parkland	Open Spaces
Hedge and shrub pruning up to twice a year  CURRENTLY UP TO 3 TIMES	Hedge and shrub pruning up to twice a year  CURRENTLY UP TO 3 TIMES
Leaf clearance once a year	Leaf clearance once a year
Empty litter bins once a week  CURRENTLY EMPTIED TWICE WEEKLY ALONG WITH LITTER PICKING OF THE PARK, WHICH WILL ALSO REDUCE TO ONCE PER WEEK. THIS WILL ALSO APPLY TO DOG BINS IF EMPTYING OF DOG BINS COMES BACK IN HOUSE	Empty litter bins once a week  CURRENTLY EMPTIED TWICE WEEKLY ALONG WITH LITTER PICKING OF THE PARK, WHICH WILL ALSO REDUCE TO ONCE PER WEEK. THIS WILL ALSO APPLY TO DOG BINS IF EMPTYING OF DOG BINS COMES BACK IN HOUSE
General inspection of playgrounds and infrastructure once every 3 months  CURRENTLY INSPECTED MONTHLY	General inspection of playgrounds and infrastructure once every 3 months  CURRENTLY INSPECTED MONTHLY
Strimming of high visibility boundary areas every 3 weeks during growing season (March to October depending on seasonal changes)  CURRENTLY CUT EVERY 3 WEEKS	Strimming of high visibility <b>path boundaries</b> every 3 weeks during growing season (March to October depending on seasonal changes).  CURRENTLY CUT EVERY 3 WEEKS
Grass cutting every 6 weeks  CURRENTLY CUT EVERY 3 WEEKS	Grass cut once a year forage cut  CURRENTLY CUT EVERY 3 WEEKS
Rake Play bark areas once a week	Rake Play bark areas once a week
Grass cutting every 6 weeks during growing season (March to October depending on seasonal changes)  CURRENTLY DONE ON A 3 WEEKLY CYCLE	Cut grass on park path and boundary every 3 weeks during growing season (March to October depending on seasonal changes)  CURRENTLY DONE ON A 3 WEEKLY CYCLE
Pond clearance once a month	Pond clearance every 3 months
Shrub and flower beds are mulched once a year	No mulching of beds
Mechanical sweeping once a month	

**Note:** Due to funding criteria, Canons Park will retain the current maintenance regimes. Countryside Parks, Nature Reserves and Woodland already have separate maintenance regimes that are not affected by these proposals

**Table 2: Parks by designation type**

Parkland	Open Spaces	Country Parks, Nature Reserves & Woodland
Alexandra Park	Brockhurst Corner	Bentley Priory
Bernays Gardens	Brockley Hill	Belmont Rattler
Byron Recreation Ground	Church Fields	Brewery Reservoir Open Space
Cedars O.S.	Chrutchurch Avenue Open Space	Church Farm
Centenary Park	Cuckoo Hill Open Space	Glenthorne
Chandos Recreation Ground	Croft	Grimsdyke Open Space
Harrow Recreation Ground	Elms Road Open Space	Harrow Weald Common
Harrow Weald Recreation Ground	Greenway	Pinner Park Farm
Hatch End Playing Fields	Grove Fields	Roxbourne Rough
Headstone Manor	Harrow Garden Village	Stanmore Common
Hooking Green	Kenton Recreation Ground	Stanmore Country Park
John Rumney	Lake Grove	
Lowlands Recreation Ground	Little Common Pinner	
Melbourne Ave	Little Common Stanmore	
Montesoles P.F.	Lynwood Close Open Space	
Pinner Memorial Park	Montrose Walk	
Priestmead Recreation Ground	Newton Ecology Park	
Queensbury Recreation Ground	Newton Park West	
Rayners Mead	Pinner Recreation Ground	
Roxbourne Park	Pinner Village Gardens	
Roxeth Recreation Ground	Ridgeway Playing Fields	
Saddlers Mead	River Pinn Open Space	
Shaftesbury P.F.	Streamside	
Stanmore Marsh	Sylvia Avenue Open Space	
Stanmore Recreation Ground	Thackery Close Open Space	
Weald Village	Tookes Green	
West Harrow Recreation Ground	Whitchurch Playing Fields	
	Whitefriars Open Space	
	Woodlands	
	Yeading Walk	

Note: Due to funding criteria, Canons Park will retain the current maintenance regimes. Countryside Parks, Nature Reserves and Woodland already have separate maintenance regimes that are not affected by these proposals



## APPENDIX 7 - CURRENT PARKS LOCKING SCHEDULE

### ENVIRONMENT AND ENTERPRISE

#### Parks & Open Spaces

#### List of Parks Locking Schedule

Park Name	Address
Alexandra Park	Alexandra Avenue, South Harrow
Beacon Centre ***	Rayners Lane
Bernays Gardens	Church Lane, Stanmore
Byron Recreation Ground	Peel Road, Wealdstone
Canons Park**	Donnerfield Avenue, Edgware
Carpenders Park Cemetery ***	Oxhey Lane
Cedars	Uxbridge Road, Harrow Weald
Centenary Park	Culver Grove, Stanmore
Chandos Recreation Ground	Camrose Avenue, Edgware
Eastcote Cemetery	Eastcote Lane, South Harrow
Harrow Cemetery	Pinner Road
Harrow Recreation Ground	Hindes Road, Harrow
Harrow Weald Cemetery	Clamp Hill, Stanmore
Harrow Weald Recreation Ground	High Road, Harrow Weald
Headstone Manor*	Pinner View
Kenton Recreation Ground*	Carlton Avenue, Kenton
Lake Grove	Dalkeith Grove, Edgware
Little Common	Elms Park Road, Pinner
Montesoles Playing Fields	Uxbridge Road, Pinner
Paines Lane Cemetery	Paines Lane, Pinner
Pinner Memorial Park	West End Lane, Pinner
Pinner New Cemetery	Pinner Road, Harrow HA5 5RH
Pinner Village Gardens	Marsh Road, Pinner
Priestmead Recreation Ground	Hartford Avenue, Kenton
Queensbury Park	Clifton Road, Kenton
Rayners Mead	Imperial Drive, Pinner
Roxbourne Park	Cannon Lane, Pinner
Roxeth Recreation Ground	Kingsley Road, South Harrow
Saddlers Mead	Clonard Way, Hatch End
Shaftsbury Playing Fields	Grimsdyke Road, Hatch End
Stanmore Recreation Ground	Stanmore Hill, Stanmore
The Croft	Cannonbury Avenue, Pinner
Wealdstone Cemetery	Byron Road, Wealdstone, HA7 3JR
West Harrow Recreation Ground*	Butler Road, West Harrow
Whitefriars	Whitefriars Avenue, Harrow Weald

\* car park only locked; park is still accessible

\*\* walled garden only locked; park is still accessible

\*\*\* locked under local arrangement

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**APPENDIX 7 - CURRENT PARKS LOCKING SCHEDULE**

**ENVIRONMENT AND ENTERPRISE**

**Parks & Open Spaces**

**List of Parks & Open Spaces within Harrow**

<b>Park Name</b>	<b>Address</b>	<b>Locked</b>
Alexandra Park	Alexandra Avenue, South Harrow	Yes
Belmont Rattler	Christchurch Avenue, Kenton	
Bentley Priory	Old Lodge Way, Stanmore	
Brockley Hill OpenSpace	Brockley Hill	
Bernays Gardens	Church Lane, Stanmore	Yes
Boulevard Gardens	Pinner Road	
Brewery Reservoir Open Space	The Common, Stanmore	
Bridge Street Gardens	Bridge Street, Pinner	
Brockhurst Corner	Clamp Hill, Stanmore	
Byron Recreation Ground	Peel Road, Wealdstone	Yes, but park still accessible from open boundary with Leisure Centre car park
Canons Park	Donnerfield Avenue, Edgware	Yes, walled garden only. Park still accessible
Cedars	Uxbridge Road, Harrow Weald	Yes
Centenary Park	Culver Grove, Stanmore	Yes
Chandos Recreation Ground	Camrose Avenue, Edgware	Yes
Christchurch Avenue Open Space	Christchurch Avenue	
Church Farm		
Church Fields	Bessborough Road, Harrow on the Hill	
Cuckoo Hill Open Space	Cuckoo Hill	
Eastcote Cemetery	Eastcote Lane, South Harrow	Yes
Elms Road Open Space	Elms Road, Harrow Weald	
Glenthorne	Common Road, Stanmore	
Greenway Open Space	Greenway, Pinner	
Grimsdyke Open Space	Old Redding, Harrow Weald	
Grove Fields	Lowlands Road	
Harrow Cemetery	Pinner Road	Yes
Harrow Garden Village	Rayners Lane	
Harrow Recreation Ground	Hindes Road, Harrow	
Harrow Weald Cemetery	Clamp Hill, Stanmore	Yes
Harrow Weald Cemetery Extension	Clamp Hill, Stanmore	Yes
Harrow Weald Cemetery Woods	Clamp Hill, Stanmore	
Harrow Weald Common	Old Redding	
Harrow Weald Recreation Ground	High Road, Harrow Weald	Yes
Headstone Manor	Pinner View	Yes, car park only. Park still accessible
Hooking Green Open Space	Hooking Green	
Kenmore Park	Kenmore Avenue, Kenton	
Kenton Recreation Ground	Carlton Avenue, Kenton	Yes, car park only. Park still accessible
Lake Grove	Dalkeith Grove, Edgware	Yes
Little Common	Elms Park Road, Pinner	
Little Common	Wood Lane, Stanmore	
Lowlands	Lowlands Road	
Lynwood Close Open Space	Lynwood Close	
Melbourne Avenue Open Space	Melbourne Avenue	
Montesoles Playing Fields	Uxbridge Road, Pinner	Yes
Montrose Walk	Gordon Avenue, Stanmore	
Newton Ecology Park	Alexandra Avenue	
Newton Park West	Alexandra Avenue	
Paines Lane Cemetery	Paines Lane, Pinner	Yes
Pinner Memorial Park	West End Lane, Pinner	Yes
Pinner New Cemetery	Pinner Road, Harrow HA5 5RH	Yes
Pinner Park Farm	George V Avenue	
Pinner Village Gardens	Marsh Road, Pinner	Yes
Priestmead Recreation Ground	Hartford Avenue, Kenton	Yes
Queensbury Park	Clifton Road, Kenton	Yes
Rayners Mead	Imperial Drive, Pinner	Yes
Ridgeway Playing Fields	Ridgeway	
River Pinn Open Space	West End Lane, Pinner	
Roxbourne Park	Cannon Lane, Pinner	Yes

<b>Park Name</b>	<b>Address</b>	<b>Locked</b>
Roxbourne Rough	Cannon Lane, Pinner	
Roxeth Burial Ground	Roxeth Hill	
Roxeth Recreation Ground	Kingsley Road, South Harrow	
Saddlers Mead	Clonard Way, Hatch End	Yes
Shaftsbury Playing Fields	Grimsdike Road, Hatch End	Yes
Stanmore Common	Warren Lane, Stanmore	
Stanmore Country Park	Dennis Lane, Stanmore	
Stanmore Marsh	Marsh Lane, Stanmore	
Stanmore Recreation Ground	Stanmore Hill, Stanmore	
Streamside	Village Way, Rayners Lane	
Streamside Reservation	Village Way, Rayners Lane	
Sylvia Avenue Open Space	Sylvia Avenue, Hatch End	
Thackery Close Open Space	Thackery Close	
The Croft	Cannonbury Avenue, Pinner	Yes
The View Point	Old Redding	
Weald Village	The Middle Way, Harrow Weald	
Tookes Green	Tookes Green	
Wealdstone Cemetery	Byron Road, Wealdstone, HA7 3JR	Yes
West Harrow Recreation Ground	Butler Road, West Harrow	Yes, car park only. Park still accessible
Whitchurch Playing Fields	Wemborough Road, Stanmore	
Whitefriars	Whitefriars Avenue, Harrow Weald	Yes
Woodlands Open Space	Woodlands, North Harrow	
Yeading Walk	Suffolk Road, Rayners Lane	