Appendix 2

Equality Impact Assessment (EqIA) October 2022



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

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

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

Equality Impact Assessment (EqIA)									
Type of Decision:	Cabinet	Other (state)							
Title of Proposal	Household Support Fund 3	Date EqIA created: September 2022							
Name and job title of completing/lead Officer	Alex Dewsnap, Director of Strategy and Pa	ex Dewsnap, Director of Strategy and Partnerships							
Directorate/ Service responsible									
Organisational approval									
EqIA approved by Head of EDI	Name: Shumailla Dar	Signature Tick this box to indicate that you have approved this EqIA Date of approval:							

1. Summary of proposal, impact on groups with protected characteristics and mitigating actions (to be completed after you have completed sections 2 - 5)

a) What is your proposal?

Harrow Council's Household Support Fund grant allocation for the period October 2022 – March 2023 is £1,476,707.18, which must be spent by 31 March 2023. The funding includes:

- The purchase of select codes for 1600-1800 households on housing benefit. The codes will be to the value of £100 and will be valid for 3 months and are redeemable in supermarkets chains and major retailers and will be distributed via post by Blackhawk.
- Approve the purchase of Free school meals (FSM) vouchers for approximately 6500 vulnerable households with children.
- An allocation of £7000 to the Self Neglect and Hoarding team to support up to 100 extremely vulnerable households with mental health conditions, elderly and frail and 27 households with No Recourse to Public Funds, as vouchers are not suitable.
- An application-based scheme to be administered by the Revenues & Benefits team.

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

Based on the data available we do not anticipate that the delivery of the extension Household Support Fund will have a negative impact on Harrow residents or result in any direct or indirect discrimination of any group that shares protected characteristics. If anything, we would expect that there would be a positive impact as the key driver is around reducing hardship and the evidence in Harrow is that some groups are more disadvantaged from an income inequality perspective than others, and would as a result of the Council's proposed allocation be positively impacted.

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

- While the EQIA process has not identified any negative impacts on groups with protected characteristics, the following issues should be taken into consideration:
- Population and borough profile data for Harrow referenced in this EQIA is based on 2011 Census data, which is out of date. Therefore, the population profile of the borough may have changed significantly since then. This makes it difficult to identify disproportionality and inequality faced by certain groups in Harrow. Although we will monitor the implementation of the scheme on a monthly basis, the fact that it is to be completed by the end of September 2022 makes further and more substantial changes more difficult.
- It is also recommended that equality monitoring is robust and incorporated as part of the performance monitoring process for the scheme to enable any changes to be made before September 2022.



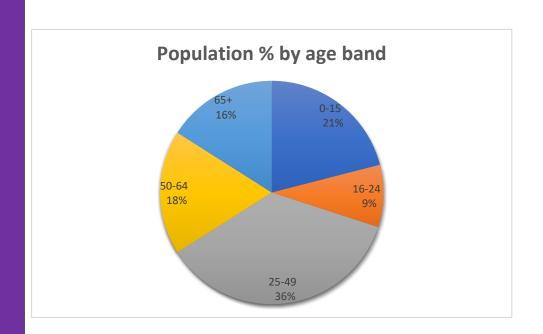
You are require characteristics. responses and will have on ea any), you will ta	haracteristic your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.					
characteristic	your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive		Major	No impact	
Age	 Harrow has a resident population of 251,160¹. It has an above average working age population aged 16-64 of just under 63% (158,000) and a growing younger population aged 0-15, which is higher than the London average, suggesting that the borough is a popular destination for families². As with most areas in the country, the borough has an ageing population. it is expected that the number of residents aged 65 plus will increase by 38% and those aged 85 plus could increase by 60% by 2030³. Data available shows that the pandemic has adversely impacted young people aged 18-24, with 1 in 10 young people out of work⁴. Harrow has one of the lowest proportion of young people Not in Education, Employment and Training (NEETS). However, due to the Covid-19 pandemic, there has been a significant increase in numbers, from 0.8% to 1.8%⁵. 	\boxtimes				

¹ Nomis 2019

² ONS -2018 mid-year estimates

Poppi and Pansi projections to 2030
 DWP Job claimant data April 2021

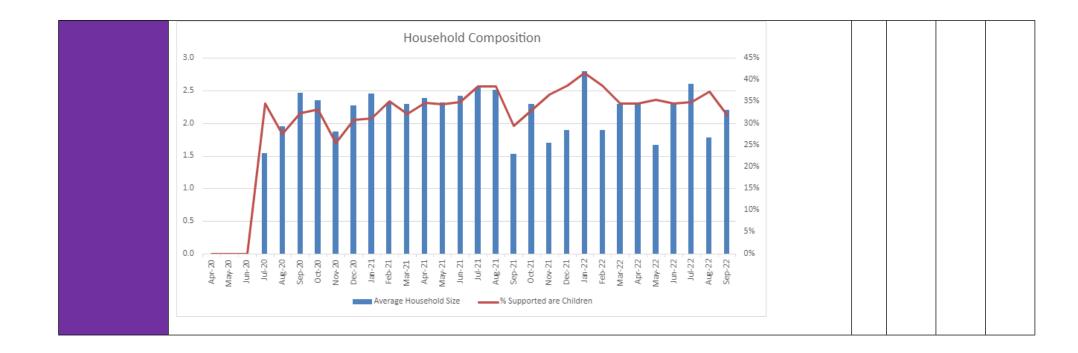
⁵ NEETS data at December 2020.

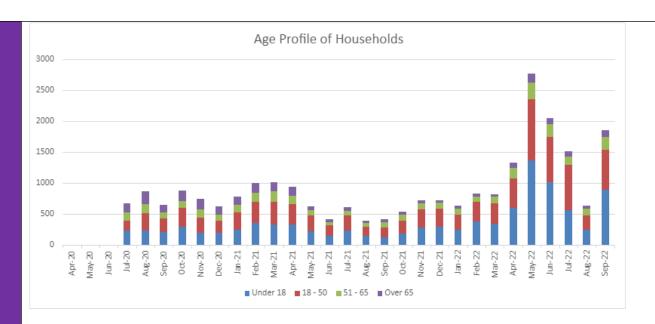


It should be noted that the number of pupils eligible for Free School Meals has increased from 3,695 in 2019 to 6263 in May 2022. Therefore the targeting of the Scheme on Free School Meals has a positive impact on those children eligible for Free School Meals.

The targeting of households on Housing benefit will have a positive impact for people of working age and the application based scheme will have a positive impact on working age and those of pensionable age due to the qualifying benefits. Our identified cohort of care leavers moving to permanent accommodation will have a positive impact on the 16-24 age category.

We also know from data from the Community Hub, that they are supporting all age groups but disproportionately more in the younger age groups than the pensioner age groups compared to our borough population. A third of those coming to the hub for food support are families with children





For those households with rent arrears due to the pandemic, the Councils Housing Benefit data shows the breakdown against age as follows:

	Council tenants	Temporary	Total
		accommodation tenants	
21 – 24	5 (2%)	1 (1%)	6 (2%)
25 – 34	16 (8%)	8 (10%)	24 (8%)
35 – 44	47 (23%)	26 (34%)	73 (26%)
45 – 54	59 (29%)	22 (29%)	81 (29%)
55 – 64	49 (24%)	7 (9%)	56 (20%)
65+	21 (10%)	1 (1%)	22 (8%)
Data not available	7 (3%)	12 (16%)	19 (7%)
Total	204	77	281

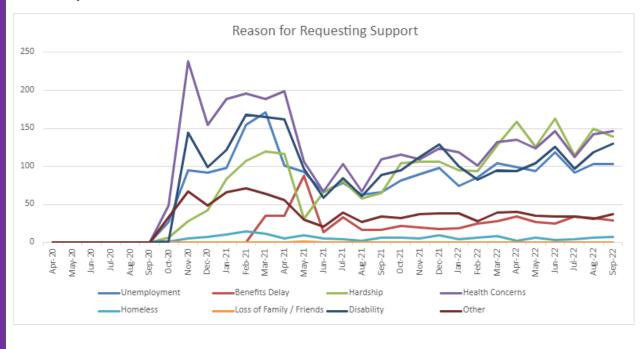
Impact

	Number and percentage of Pupils elig	•	2019 Percentage of pupils eligible for FSM			•	• • •	Number of pupils eligible	2021 Percentage of pupils eligible for FSM	All		
	With regards Free School Meals, across all Harrow schools, the percentage of pupils with an Education and Healthcare Plan who are eligible for FSM increased from 19.6% (223 pupils) in 2019 to 26.9% (34 pupils) in 2021. In parallel, the percentage of pupils on SEN Support Plan who are eligible for FS increased from 17.2% (633 pupils) in 2019 to 24.1% (867 pupils) in 2021. Pupils with No SEN who are eligible for FSM increased too, from 8.8% (2,839 pupils) in 2019 to 13.6% (4,516 pupils) in 2021.							% (345 or FSM vho are				
Disability	a disability. There is a strong correl economic inactivity and The Housing Benefits Team do Accommodation would classify receive. This is also only recoinstances, only if it affects the I member of the household in reco	therefore not cape themse reded if the evel of eceipt of	re experienture whether whethe	ther or aving a know t. For it	not a Ho disabili that the nstance pendent	I financial ousing Be ty, only w benefit is there are Payment	hardsh enefit cl hat disa s receive e 6 clai	nip. aimant ability b ved and ms whe	in Emerge enefits the l, in most ere at leas	ency ey st one		
	The Free school meals (FSM) which although the data doesn likely that the majority of paren of those people on CTS are wi 10-15% from 2019-2021 has a various elements of the schem ONS data for 2016-201	t breakd ts would thin this positive e would	lown to as I be in the age brack e impact o have a po	ssess e 30-60 ket). Then age ositive i	xactly wage brace growth for child impact of the contract of t	where pare acket (give th in eligib Iren. On t on age.	ental agen as a bility of his bas	ge will b proxy f Free So sis, take	e, it is mo for this ov chool Mea n altogeth	ore than er 75% als from ner, the		

Education and Health Care Plan (EHCP)	223	19.6%	1136	266	22.1%	1202	345	26.9%	1281
SEN Support	633	17.2%	3685	718	19.8%	3627	867	24.1%	3593
No SEN	2839	8.8%	32440	3347	10.1%	33096	4516	13.6%	33312
Total	3695	9.9%	37261	4331	11.4%	37925	5728	15.0%	38186

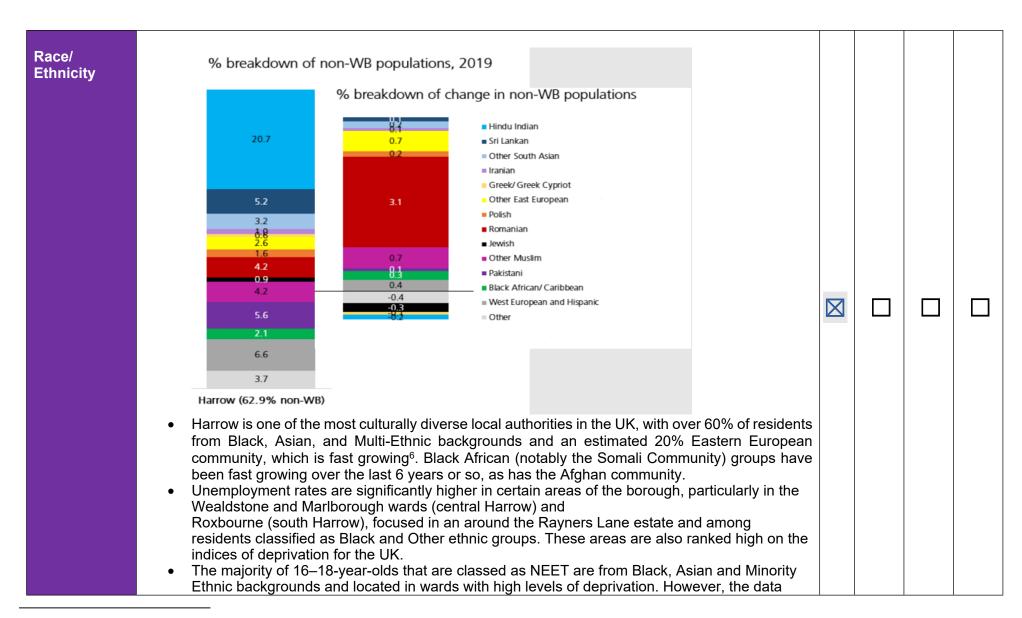
Source: Spring School Census 2019, 2020 and 2021

Disability benefits are listed as qualifying benefits for the application based scheme. The Targeting of households known to the Self-Harm and Hoarding team will also support vulnerable adults with mental health conditions. Disability is also a increasing reason for people requesting food support from the community hub.



	<u>Impact</u>		
	The Council does not collect data on disability. However, the inclusion of disability related benefits as qualifying benefits for the application based scheme and support for the community hub, means we will be able to report as part of the monitoring information how many households with a disability, which would include non-physical disabilities such as mental health have been supported. However, from the data the Council has on children eligible for Free School Meals, it can be concluded that these aspects of the scheme would have a positive impact on those people and families who are disabled and in receipt of disability benefits or FSM.		
Gender reassignment	 There is limited national data collected for this characteristic. We will need to consider the inequalities and discrimination experienced for this protected group when data becomes available. The charity GIRES estimated in their Home Office funded study in 2009 the number of transgender people in the UK to be between 300,000 and 500,000. More recently Stonewall advised that it is estimated that around 1% of the population might identify as trans, including people who identify as non-binary. This would represent about 600,000 trans and non-binary people in Britain and about 2,500 people in Harrow. Impact At this stage there is no way of concluding whether the Household Support Fund 2 would have either a positive or negative impact on this group. 		
Marriage and Civil Partnership	At the time of the 2011 Census 54% of Harrow's residents were married, which was the highest level in London. 21% of households were married, or in same-sex civil partnerships, with dependent children, the highest level in London. At October 2020 there have been 144 Same Gender Civil Partnerships in Harrow, 25 of which has been converted to a Marriage. There have been 8 Opposite Gender Civil Partnerships. There have been 57 Same Sex marriages. Impact The extension Household Support Fund implementation will aim to support residents regardless of their partnership status.		

	 ONS births figures show Harrow as having 3,526 live births in 2019. 14 live births per 1000 population is higher than the England & Wales average of 10.8 The borough has the worst infant mortality rate in London, at a rate of 5.1 deaths per 1000 live births, which is a strong indicator of poverty and inequality in the borough. 		
Pregnancy and Maternity	<u>Impact</u>		
	Although there isn't any data the Council holds for CTS or Free School Meals on whether recipients (or their parents) are either pregnant or on maternity leave the extension Household Support Fund implementation will aim to support residents regardless of their status.		



⁶ Harrow Economic assessment 2019-2020:population

- also shows that the single largest ethnic group of pupils aged 16-18 classed as NEET is White British.
- At ward level Marlborough and Wealdstone have the highest number of households in need of re-housing. These respectively have a Black, Asian and Minority Ethnic population of 77% and 75%.
- The highest rates of overcrowding is in Greenhill ward (97.5 per 1,000 households) and a Black, Asian and Minority Ethnic population of 74% (2011 census).
- Data shows us that some Black, Asian and Minority Ethnic residents are more likely to
 experience barriers to employment due to lack of English language, functional and digital skills
 and therefore more likely to be in receipt of financial support through such things as Universal
 Credit, Council Tax support and (if there are children in the household) Free School Meals.

With regards Free School Meals, in 2021, the highest proportion of pupils who are eligible for FSM are of Traveller of Irish Heritage Background (89.6% - 60 pupils). This percentage has increase from 2019 (67.6% - 46 pupils), however the population numbers of this ethnic group are significantly low. The second highest group are of White and Black Caribbean ethnic origin (34.6% - 187 pupils), having increased from 24% (131 pupils) in 2019. The third highest group are of Black Caribbean ethnic origin (32.8% - 314 pupils). This percentage has increased from 23.4% (235 pupils) in 2019. The table below gives the full breakdown of pupils on FSM compared to the overall pupil population in Harrow for 2019-2021.

Number and percentage of Pupils eligible for Free School Meals in Harrow Primary, Secondary, Special, Nursery and PRU schools
by Ethnicity (Enrolments: Current and Dual-Main)

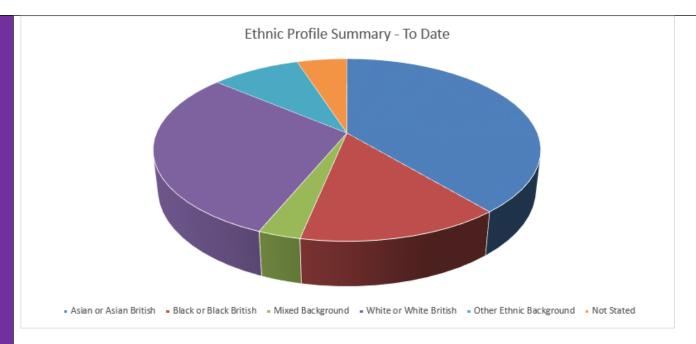
		2019			2020		2021					
Ethnicity	Number of pupils eligible for FSM	Percentage of pupils eligible for FSM	All pupils	Number of pupils eligible for FSM	Percentage of pupils eligible for FSM	All pupils	Number of pupils eligible for FSM	Percentage of pupils eligible for FSM	All pupils			
Traveller of Irish Heritage	46	67.6%	68	65	73.9%	88	60	89.6%	67			
White and Black Caribbean	131	24.0%	546	156	28.2%	553	187	34.6%	541			
Black Caribbean	235	23.4%	1003	267	27.0%	990	314	32.8%	957			
Black – African	483	21.0%	2305	526	23.2%	2272	638	29.7%	2148			
Any Other Ethnic Group	348	18.7%	1857	442	22.5%	1966	592	29.7%	1994			
White and Black African	68	21.3%	319	80	23.3%	343	99	28.2%	351			
Any Other Black Background	80	20.0%	400	92	22.8%	403	110	27.5%	400			

Gypsy / Roma	6	17.6%	34	8	16.3%	49	11	26.2%	42
Refused	44	11.9%	369	69	16.5%	418	102	21.0%	485
Any Other Mixed Background	203	15.6%	1303	231	18.0%	1280	266	20.0%	1327
Bangladeshi	38	12.4%	307	46	14.5%	318	61	18.8%	325
Any Other Asian Background	756	10.7%	7077	911	12.8%	7135	1297	18.3%	7093
White – British	448	12.4%	3623	481	13.9%	3460	565	17.1%	3296
Information Not Yet Obtained	12	12.9%	93	16	15.4%	104	20	16.4%	122
Pakistani	225	11.8%	1902	228	12.3%	1861	289	15.7%	1844
White and Asian	88	9.2%	953	122	12.1%	1007	152	14.5%	1046
White – Irish	27	7.7%	350	25	8.0%	311	27	9.6%	280
Any Other White Background	255	4.2%	6105	326	5.2%	6250	594	9.4%	6340
Chinese	6	3.3%	180	10	5.1%	197	12	5.9%	203
Indian	196	2.3%	8467	230	2.6%	8920	332	3.6%	9325
Total	3695	9.9%	37261	4331	11.4%	37925	5728	15.0%	38186

Source: Spring School Census 2019, 2020 and 2021

For those households with rent arrears due to the pandemic, the Councils Housing Benefit data shows the breakdown against ethnicity as follows:

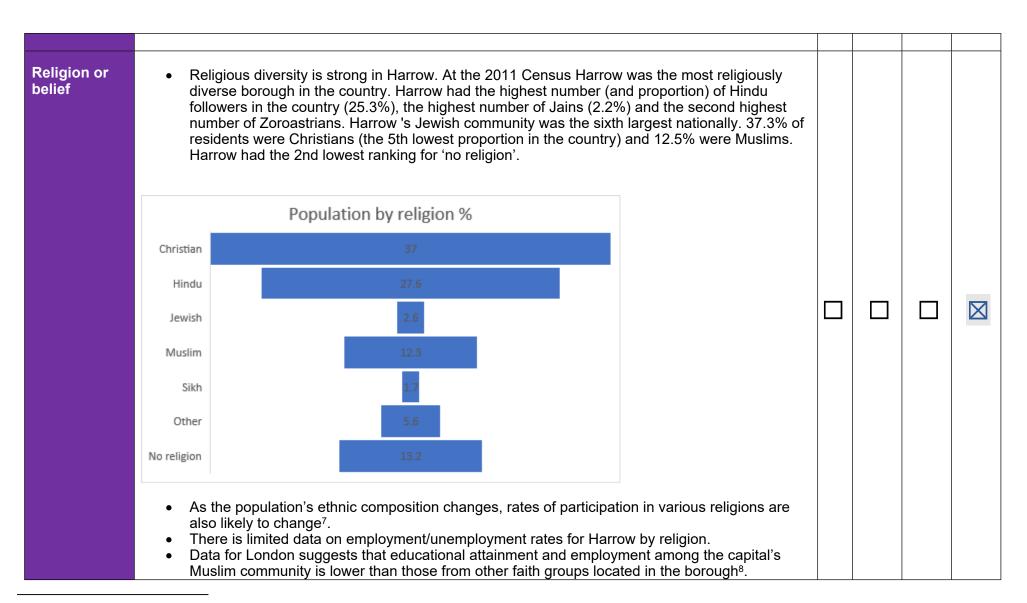
	Council tenants	Temporary	Total
		accommodation tenants	
Asian / Asian British	25 (12%)	13 (17%)	38 (14%)
Black / African / Caribbean /	66 (32%)	16 (20%)	82 (29%)
Black British			
Mixed / multiple ethnic	13 (6%)	2 (3%)	15 (5%)
groups			
White	50 (25%)	13 (17%)	63 (22%)
Other ethnic group	5 (2%)	2 (3%)	7 (3%)
Prefer not to say	45 (22%)	31 (40%)	76 (27%)
Total	204	77	281



For those residents accessing food support from the Community Hub, the largest share are from an Asian or Asian British background. The number accessing support who are black or Black British looks disproportionately higher than the general Harrow Population.

Impact

Although there isn't any data the Council holds for housing benefit on the ethnicity of recipients (or their parents), the proxy indicator of Black, Asian and Minority Ethnic residents being more likely to experience barriers to work (last bullet above), would suggest that all the elements of the Household Support Scheme will have a positive impact on those with a Black, Asian and Minority Ethnic heritage, by virtue of the relationship between barriers to employment, hardship and a higher likelihood of therefore being in receipt of financial assistance. Black heritage, Bangladeshi and Pakistani pupils are also disproportionately represented on the cohort of children in receipt of Free School Meals and users of the Community Hub when compared to the broader population, so again the targeting of the Scheme will have a positive impact on race/ethnicity. Similarly, looking at rent arrears data black heritage households are also disproportionately represented in this cohort, so would benefit from the scheme.



⁷ Harrow Economic Assessment: 2019-2020:population

⁸ Annual Population Survey 2018.

	<u>Impact</u>		
	The Scheme will aim to support all residents regardless of their religion or belief, and where possible monitoring information will be gained to understand the impact on this characteristic.		
Sex	 The Government's population estimates as of mid-2019 show that the total population of Harrow is now 251,200, made up of 125,800 men and 125,400 women. Overall, the number of males and females living in Harrow is very similar. Economic activity among Harrow's male population is higher than the London average at 86%, compared with 83%. However, economic activity among females in the borough is lower than the London average at 72%. Harrow is a low wage borough, with both men and women that are employed in the borough earning less than the London average of £760¹ºearning less compared to men. Women earn less than men in the borough. Average gross weekly earnings among women working in Harrow is £500, nearly 38% lower than the London average of £688¹¹¹. While the pandemic may have negatively impacted both sexes, the shift to home working may have had a positive impact in enabling women to return to work, as they are able to share childcare responsibilities. With regards Free School Meals, across all Harrow schools, the percentage of Female pupils who are eligible for FSM increased from 10% (1,858 pupils) in 2019 to 14.8% (2,836 pupils) in 2021. In parallel, the percentage of Male pupils who are eligible for FSM increased from 9.8% (1,837 pupils) in 2019 to 15.2% (2,892 pupils) in 2021. In 2021, the proportion of male pupils who are eligible for FSM is marginally higher than the proportion of female pupils. This is in contrast to the previous years (2019 and 2020) where the proportion of female pupils eligible for FSM was higher than the proportion of male pupils. However, the difference does not suggest there is any disproportionate impact with regards gender for pupils in receipt of Free School Meals. For those households with rent arrears due to the pandemic, the Councils Housing Benefit data shows the breakdown against female and male headed households as follows: 		

⁹ NOMIS: Labour supply (at December 2020) ¹⁰ NOMIS: earnings by place of work 2020

¹¹ NOMIS: earnings by place of work: 2020

		Council tenants	Temporary accommodation tenants	Total			
	Female headed household	136 (67%)	55 (71%)	191 (68%)			
	Male headed household	61 (30%)	19 (25%)	80 (28%)			
	Data not available	7 (3%)	3 (4%)	10 (4%)			
	Total	204	77	281			
	On the basis that economic men and more households i there is a higher likelihood the However the Household Supwhich is a positive impact.	n council housing or nat the scheme will	r temporary accommodation have a more positive impac	are headed by women to n women than men.			
Sexual Orientation	 The Office for National Statistics estimated in 2014, 2.6% of Londoners identify as lesbian, gay, or bisexual, the highest of any UK region¹². There is no official data on sexual orientation for Harrow in relation to employment. LGBT people are also likely to be underrepresented among business owners within Harrow. 						
	<u>Impact</u>						$ \ \Box \ $
	Although there isn't any data orientation of recipients (or t children will be heterosexua impact on those whose sexuwill aim to support residents	heir parents) the fac I couples, the House al orientation is het	ct that there is a higher likeli ehold Support Fund 2 is mo erosexual. However, the im	hood that families with re likely to have a positiv	Э		

¹² Trust for London: London's Poverty profile 2016.

2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics? Yes No
If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below
There will be a positive impact on working households with children.
There will be a positive impact on residents in receipt of housing benefit.
There will be a positive impact on vulnerable households.
 There will be a positive impact on Harrow residents who can take advantage of the ongoing food resource via the Community Hub.
2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc.), could your proposals have an impact on individuals/service users, or other groups? Yes No
If you clicked the Yes box, Include details in the space below • The Household Support Fund 3 is principally to support those families in hardship, so all groups who receive funding will be from a group impacted by hardship.
• It should be noted that the number of pupils eligible for Free School Meals has increased from 3,695 in 2019 to 6263 in 2022 (which in percentage terms is a move from 10% of the pupil population in Harrow in 2019 to 15% in 2021).

3. Actions to mitigate/remove negative impact

Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for each group, identified in section 2. In addition, you should also consider, and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer
Limited data is available on the demographic and ethnic profile of those who will be beneficiaries of the various elements of the scheme	 Monitoring data will be developed as the scheme is rolled out and reported on a monthly basis 	 The Monthly data will be reported to the project working group and if necessary further demographic data will be sought to support the overall understanding of the impact of the scheme. 	Mar 2023	Angelica Stoichkov

4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

- 1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
- 2. Advance equality of opportunity between people from different groups
- 3. Foster good relations between people from different groups

Include details in the space below

- 1. The Scheme will help to advance the equality of opportunity for groups who share relevant protected characteristics and those who do not by addressing inequalities around access to financial support for many groups in financial hardship.
- 2. The Scheme will help foster good relations between communities through the creation of financial support for those most in need.

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

Outcome 1 No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed
Outcome 2 Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4
Outcome 3
This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.
Include details here See mitigations section as this refers to those on pensionable age.