

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

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

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

Equality Impact Assessment (EqIA)

Type of Decision:	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
Title of Proposal	Review of Social Housing Allocation Scheme	Date EqIA created: 13/12/22
Name and job title of completing/lead Officer	Meghan Zinkewich-Peotti Housing Strategy Project Manager	
Directorate/ Service responsible	Housing Division, Place Directorate	
Organisational approval		
EqIA approved by the EDI Team:	Name: Jennifer Rock Assistant Policy Officer EDI Team	Signature <input checked="" type="checkbox"/> Tick this box to indicate that you have approved this EqIA Date of approval: 02/03/23

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?

The proposal is a minor amendment to Harrow Council's Housing Allocation Scheme for social housing. The Housing Allocation Scheme is a statutory requirement of Part VI of the Housing Act 1996 as amended by the Homelessness Act 2002 and the Localism Act 2011. The Scheme sets out how the Council allocates the rented social housing which is either owned by Harrow Council or which is owned by housing associations (registered providers) but to which Harrow Council has nomination rights. The Scheme sets out the eligibility criteria for joining the social housing register and the policy for prioritising housing applications.

The proposed amendment to the Scheme is required following an Order made by the High Court of Justice in connection with a judicial review claim by a housing applicant. The proposed amendment will remove the local residency requirement for eligible non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow or another place in the UK (for example, if they have lived in Home Office asylum accommodation and have had no choice in the location). This approach is in line with that of other local authorities.

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

The proposed amendment will have a positive impact on eligible social housing applicants who are non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow or another place in the UK. As non UK national with refugee status in the UK have the protected characteristic of race within the meaning of section 9 Equality Act 2010, the proposed change will have a positive impact on eligible applicants with this protected characteristic.

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

No potential negative impacts have been identified in relation to the proposed change, but the impact of the proposed change once implemented will be monitored and reviewed to identify any positive or negatives outcomes in relation to any protected characteristics.

2. Assessing impact					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to borough profile data , equalities data , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on each group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact			
Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact
			Minor	Major	
Age	<p>Population of Harrow The total usual resident population in Harrow on Census Day 2021 was 261,200 people. 19.7% of residents were children (aged 0-15), 64.9% were of working age (16-64) and 15.4% were aged 65 and above. On Census Day 2021, 64,067 (24.5%) people in Harrow had a non-UK identity only and 10% of people in Harrow had lived in the UK for less than 5 years. The data on age has not yet been released.</p> <p>Social Housing Register On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were home seekers and 193 (8.7%) were transfer applicants- those already in social housing but with an identified need to move to a more suitable property. Of the 1986 home seekers, 3.7% were aged under 25 years, 47.5% were aged between 25 and 45 years old, 40.6% were aged between 45 and 64 years old and 8.1% were aged 65 years and older.</p> <p>While older people are under-represented on the housing register compared to the overall population this is likely to be because of the range of other specialist housing and care options available to them, such as living with relatives, domiciliary care and residential care.</p> <p>The age profile of applicants on the housing register is influenced by other wider factors, such as income levels (including welfare benefits) by age, affordability of private rented</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>housing and home ownership for different age groups and the supply of affordable housing in Harrow.</p> <p>Applicants who are non-UK nationals On 21 February 2023 there were 201 eligible home seekers on the housing register who were non-UK nationals. 5% were aged under 25 years, 53.2% were aged between 25 and 45 years old, 42.3% were aged between 45 and 64 years old and 5.5% were aged 65 years and older. 126 of these applicants were in Band C-, of which 3.2% were aged under 25 years, 64.2% were aged between 25 and 45 years old, 29.4% were aged between 45 and 64 years old and 3.2% were aged 65 years and older.</p> <p>Impact of the proposed amendment The proposed amendment will have a positive impact on eligible social housing applicants who are non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow or another place in the UK, across all age groups.</p>				
<p>Disability</p>	<p>Population of Harrow The total usual resident population in Harrow on Census Day 2021 was 261,200 people. 12% of residents identified as disabled under the Equality Act 2010. Figures from the latest census of England and Wales show 31,258 people in Harrow said they had such an impairment as of March 2021 – 13.2% of the area's population. Of these people, 17,450 (7.3%) said their disability stopped them from carrying out regular activities 'a little', while 13,808 (5.9%) said it did so 'a lot'. In the ONS Annual Population Survey (Oct 2021 to Sep 2022) 15.9% of Harrow's working age population classified themselves as disabled, a total of 25,000 people.</p> <p>Social Housing Register On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were home seekers and 193 (8.7%) were transfer applicants- those already in social housing but with an identified need to move to a more suitable property. 4.2% of the 1986 home seekers were awarded priority Band A+ or A for 'Medical' reasons, and 5.8% were in receipt of disability benefit.</p> <p>Others with disabilities or long-term health conditions may have cumulative needs and be given priority under a different reason such as 'Severe Hardship' or 'Social</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>Hardship'. It is also likely that applicants in categories such as 'Under-Occupation' and 'Elderly Sheltered' are disabled or have a long-term health condition.</p> <p>Unlike some other protected characteristics, the status of disability can change. Whilst we record this information at the application stage and again at the offer/letting stage, and it is the responsibility of the applicant to notify us of changes in their circumstances, we are unable to keep every record up to date on the Housing Register. For these reasons there is currently limited comprehensive data on disability.</p> <p>Applicants who are non-UK nationals On 21 February 2023 there were 201 eligible home seekers on the housing register who are non-UK nationals. 2.5% were awarded priority Band A+ or A for 'Medical' reasons, and 12.4% were in receipt of disability benefit. 126 of these applicants were in Band C-, and 14 (12.5%) were in receipt of disability benefits.</p> <p>Impact of the proposed amendment The proposed amendment will have a positive impact on eligible social housing applicants who are non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow or another place in the UK. Based on the limited data available, a small number of the applicants who will be positively impacted by this change may have the protected characteristic of disability.</p>				
<p>Gender reassignment</p>	<p>Population of Harrow The total usual resident population aged 16 years and over in Harrow on Census Day 2021 was 209,261 people, of these 18,832 people gave no answer. 188,901 people (90.1%) aged 16 years and over had a gender identity the same as sex registered at birth, and 1108 (0.9%) had a gender identity different from sex registered at birth but no specific identity given. 776 (0.37%) identified as trans, includes people who identify as a trans man, trans woman, non-binary or with another gender identity.</p> <p>Social Housing Register On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were 'home seekers' and 193 (8.7%) were 'transfer applicants'- those already in social housing but with an identified need to move to a more suitable property. There</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>is limited data on gender reassignment. There were no applicants identifying as trans or non-binary.</p> <p>Impact of the proposed amendment We do not have sufficient data on gender reassignment to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on this group.</p>				
<p>Marriage and Civil Partnership</p>	<p>Population of Harrow The total usual resident population in Harrow on Census Day 2021 was 261,200 people. 112,921 (53.9%) of Harrow's residents were married, which was the highest level in London. There were 89642 Households in Harrow. 19162 (21.4%) of households were married, or in same-sex civil partnerships, with dependent children, one of the highest levels in London.</p> <p>Social Housing Register There is limited data on marriage and civil partnership.</p> <p>Impact of the proposed amendment We do not have sufficient data on marriage and civil partnership to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on this group.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Pregnancy and Maternity</p>	<p>Population of Harrow The total usual resident population in Harrow on Census Day 2021 was 261,200 people. ONS births figures show Harrow as having 3312 live births in 2021. 12.7 live births per 1000 population is higher than the England & Wales average of 10.5.</p> <p>Social Housing Register On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were home seekers and 193 (8.7%) were transfer applicants- those already in social housing but with an identified need to move to a more suitable property. There is limited information specifically about pregnancy and maternity (with children aged under 2 years).</p> <p>Unlike some other protected characteristics, the status of pregnancy and maternity changes. Whilst we record this information at the application stage and again at the</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>offer/letting stage, and it is the responsibility of the applicant to notify us of changes in their circumstances, we are unable to keep every record up to date on the Housing Register.</p> <p>Applicants who are non-UK nationals On 21 February 2023 there were 201 eligible 'home seekers' on the housing register who are non-UK nationals. 126 of these applicants were in Band C-. There is limited information specifically about pregnancy and maternity (with children aged under 2 years).</p> <p>Impact of the proposed amendment We do not have sufficient data on pregnancy and maternity (with children aged under 2 years) to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on this group.</p>				
Race/ Ethnicity	<p>Population of Harrow The total usual resident population in Harrow on Census Day 2021 was 261,200 people. Harrow's population is one of the most diverse nationally. In 2021, 45% of the population identified as "Asian" or "Asian British", which ranks 3rd nationally; 8.6% identified as "Black, Black British, Caribbean or African"; 3.8% identified themselves within mixed or multiple ethnic groups; 36.5% identified as "White"; 7.2% identified themselves within "Other" ethnic groups. Nationally, Harrow is home to the largest population of Sri Lankan born (4.1%) and Romanian born (8.1%) communities and has the 4th largest Afghan born (1.8%) population in the country.</p> <p>Social Housing Register On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were home seekers and 193 (8.7%) were transfer applicants- those already in social housing but with an identified need to move to a more suitable property. 87% of home seekers disclosed their ethnicity and of these reports 23.2% were "White", 23.5% were "Asian", 20.1% were "Black", 5.8% were of "Mixed" ethnicity and 6.2% identified with "Other" ethnic groups.</p> <p>Applicants who are non-UK nationals On 21 February 2023 there were 201 eligible home seekers on the housing register who are non-UK nationals. 94% of non-UK National home seekers disclosed their ethnicity and of these reports 40% were "White", 15% were "Asian", 14.5% were "Black", 5.5%</p>	☒	☐	☐	☐

	<p>were of “Mixed” ethnicity and 12% identified with “Other” ethnic groups. 126 of these applicants were in Band C-, and 49.2% were “White”, 11.1% were “Asian”, 9.3% were “Black”, 4.8% were of “Mixed” ethnicity and 13.5% identified with “Other” ethnic groups, and 11.9% did not state their ethnicity.</p> <p>Impact of the proposed amendment The proposed amendment will have a positive impact on eligible social housing applicants who are non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years’ residence in Harrow. As non UK national with refugee status in the UK have the protected characteristic of race within the meaning of section 9 Equality Act 2010, the proposed change will have a positive impact on applicants with this protected characteristic.</p>				
<p>Religion or belief</p>	<p>Population of Harrow The total usual resident population in Harrow on Census Day 2021 was 261,200 people. Harrow was the most religiously diverse borough in the country, with the highest population identifying as ‘Hindu” (67392, 25.8%) and lowest reporting “No religion” (10.6%), nationally. 7,695 (2.9%) identified with “Other” religions second highest number, nationally. This group includes Jainism and Zoroastrian religions. 7,304 (2.8%) of Harrow 's usual residents identified as Jewish and is the was the eighth largest nationally. 88,602 (33.9%) of residents were Christians, 41,503 (15.9%) identified as Muslims and 2812 (1.1%) Buddhist.</p> <p>Social Housing Register On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were home seekers and 193 (8.7%) were transfer applicants- those already in social housing but with an identified need to move to a more suitable property. 31.9% were Christian, 35.4% were Muslim, 11.1% did not state their religion, 10.9% had no religion, 7.9% were Hindu, 1.5% were of Other religions, 0.51% were Jewish, 0.4% were Sikh and 0.3% were Buddhist. Of the home seekers, 32.5% were Christian, 34.9% were Muslim, 11.3% did not state their religion, 10.6% had no religion, 8.1% were Hindu, 1.4% were of Other religions, 0.4% were Jewish, 0.4% were Sikh and 0.3% were Buddhist.</p> <p>Applicants who are non-UK nationals</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>

	<p>On 21 February 2023 there were 201 eligible home seekers on the housing register who are non-UK nationals. 126 of these applicants were in Band C-, 37.5% were Christian, 29.8% were Muslim, 10.6% did not state their religion, 14.5% had no religion, 3.8% were Hindu, 1.9% were of Other religions, 1% were Buddhist and 1% were Sikh.</p> <p>Impact of the proposed amendment The proposed amendment will have a positive impact on eligible social housing applicants who are non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow, across all religious groups.</p>				
<p>Sex</p>	<p>Population of Harrow The total usual resident population in Harrow on Census Day 2021 was 261,200 people. 132,406 (50.7%) of residents were female and 128,797 (49.3%) were male.</p> <p>Social Housing Register On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were home seekers and 193 (8.7%) were transfer applicants- those already in social housing but with an identified need to move to a more suitable property. Of the 1986 home seekers, (63.7%) were female and (36.3%) were male.</p> <p>Applicants who are non-UK nationals On 21 February 2023 there were 201 eligible home seekers on the housing register. who were non-UK nationals. 50.3% were female and 49.7% were male. 126 applicants were in Band C-, 49.2% were female and 50.8% were male.</p> <p>Impact of the proposed amendment The proposed amendment will have a positive impact on eligible social housing applicants who are non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow, across both female and male applicants.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Sexual Orientation</p>	<p>Population of Harrow The total usual resident population aged 16 years and over in Harrow on Census Day 2021 was 209,261 people. 182,702 people (87.2%) aged 16 years and over in Harrow identified as straight or heterosexual and 4239 people (2.02%) aged 16 years and over in Harrow identified as lesbian, gay, bisexual, or other (LGB+).</p> <p>Social Housing Register</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>On 21 February 2023 there were 2213 eligible applicants on the housing register. 1986 (89.7%) were home seekers and 193 (8.7%) were transfer applicants- those already in social housing but with an identified need to move to a more suitable property. There is limited data about sexual orientation. Only 36% of home seekers disclosed their sexual orientation. Of these reports 80% identified as heterosexual/straight, 2.6% identified as bi-sexual with 1% identifying as gay or lesbian.</p> <p>Applicants who are non-UK nationals On 21 February 2023 there were 201 eligible home seekers on the housing register who are non-UK nationals. 87% of non-UK National 'home seekers' disclosed their sexual orientation, of these reports 78% identified as heterosexual/straight, 4.5% identified as bi-sexual with none identifying as gay or lesbian. 126 applicants were in Band C-, 77% identified as heterosexual/straight, 6.4% identified as bi-sexual, 0% identified as gay or lesbian, 0.8% identified as 'other' and 15.9% did not state their sexuality.</p> <p>Impact of the proposed amendment The proposed amendment will have a positive impact on eligible social housing applicants who are non-UK nationals with refugee status in the UK who would qualify for inclusion on the housing register but are unable to demonstrate at least 5 years' residence in Harrow, across all sexual orientations.</p>				
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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

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

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

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

The proposal will eliminate discrimination against eligible social housing applicants who are non-UK national with refugee status in the UK and have the protected characteristic of race under the Equality Act 2010, advancing equality of opportunity between social housing applicants from different groups.

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

Outcome 1

No change required: the EqlA 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 EqlA 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