



### 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)

<b>Type of Decision:</b>	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
<b>Title of Proposal</b>	Social Housing Decarbonisation Fund (SHDF) programme	<b>Date EqIA created 28/04/23</b>
<b>Name and job title of completing/lead Officer</b>	Andres Shoman   Project Lead: Strategy & Programme	
<b>Directorate/ Service responsible</b>		
<b>Organisational approval</b>		
<b>EqIA approved by</b>	<b>Name: Jennifer Rock</b>  <b>Assistant Policy Officer</b> <b>EDI Team</b>	<b>Signature</b> <input checked="" type="checkbox"/> <b>Tick this box to indicate that you have approved this EqIA</b>  <b>Date of approval: 11.05.2023</b>

**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?**

To provide a full assessment for the landmark central government grant funded scheme for housing decarbonisation. The Social Housing Decarbonisation Fund (SHDF) wave 2.1 is a 2-year programme with a strict reporting, contractual and milestone delivery framework set by the Department for Energy Security and Net Zero (DESNZ).

Following the London Borough of Harrow’s successful grant bid for 100% of applied funding, Harrow has been awarded with the highest grant relative to stock size in London – at £2.147m contributing to a contract circa £5.1m of which £2.93m will be co-funding by Harrow to deliver energy efficiency works across over 226 homes, impacting a diverse resident profile.

Project Name	Project Description
SHDF wave 2.1	<p>As part of the council’s SHDF wave 2.1 application, the Council set out an ambitious retrofit plan. This includes the planned upgrade of 100% of its poorly performing British Iron and Steel Federation (BISF) archetype non-traditional housing stock of the approved decarbonisation roadmap. This will see the remainder of 97 BISF properties whole-house retrofitted with fabric first measures and Solar PV, to achieve (Energy Performance Certificate (EPC) Band C and above over the next 2 financial years of delivery. The programme includes Capital funding for windows, roofs, doors and ventilation to be delivered in parallel with Bid measures.</p> <p>We are actively dealing with Fuel Poverty through the SHDF programme which will reduce bills as a result of energy efficiency measure implementation. This follows a recent influx fuel poverty referrals, involving consultation with vulnerable resident groups.</p>

**b) Summarise the impact of your proposal on groups with protected characteristics**  
**Energy Efficiency Measures**

1. We do not anticipate that the SHDF programme will have a negative impact on Harrow residents or result in any direct or indirect discrimination of any group that shares protected characteristics.
2. Outcomes through proposed whole-house retrofit will include the following:
  - Damp & Mould: Through fabric first intervention, improved insulation and smart ventilation across homes, minimising Health & Safety risk.
  - Comfort and wellbeing: Warmer and better insulated homes which provide enhanced living environments with enhanced ambient temperature management across winter and summer extremes.
  - Fuel Poverty – tangible bill reduction following programme of energy efficiency measures.
  - Carbon reduction – whole house retrofit
  - Renewable energy integration – solar PV installation across multiple homes
  - Environmental control – through sensors which can remotely monitor humidity, temperature and carbon dioxide emissions, informing of multiple indicators for decarbonisation
3. Where appropriate, the energy efficiency home improvements will support the access needs of vulnerable residents who are suffering as a result of fuel poverty, by installing measures which will reduce fuel bills, creating warmer, safer and more comfortable living environments. Safety will be impacted by way of the installation of environmental sensors.

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

We do not anticipate that these projects will have a negative impact on Harrow residents or result in any direct or indirect discrimination of any group that shares protected characteristics.

2. Assessing impact																			
Protected characteristic		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																	
For <b>each</b> 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															
<b>Age</b>	<p>Harrow has a resident population of 261,300<sup>1</sup>. Increasing by 9.3% in the ten years between 2011 and 2021 with an increase of 7.8% in people aged 15 to 64 years, It has an above average working age population aged 16-64 of just under 64% (160,462) and a growing younger population aged 0-15 of 18.5% (48,300), which is higher than the London average, suggesting that the borough is a popular destination for families<sup>2</sup>.</p> <div style="text-align: center;"> <table border="1" style="margin: 0 auto;"> <caption>Population by Age band % (Harrow 2021 Census)</caption> <thead> <tr> <th>Age Band</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>0-15</td> <td>20%</td> </tr> <tr> <td>16-24</td> <td>10%</td> </tr> <tr> <td>25-49</td> <td>37%</td> </tr> <tr> <td>50-64</td> <td>17%</td> </tr> <tr> <td>65-84</td> <td>13%</td> </tr> <tr> <td>85+</td> <td>2%</td> </tr> </tbody> </table> </div>	Age Band	Percentage	0-15	20%	16-24	10%	25-49	37%	50-64	17%	65-84	13%	85+	2%	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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<sup>1</sup> Census 2021

<sup>2</sup> Census 2021

	<ul style="list-style-type: none"> <li>As with most areas in the country, the borough has an ageing population. With the number of residents aged 65 plus increasing by 19.4% in the ten years between 2011 and 2021 with 31% rise in people aged 90 years and over<sup>3</sup>. Those aged 85 plus could increase by 60% by 2030<sup>4</sup>.</li> <li>Data available shows that the pandemic has adversely impacted young people aged 18-24, with 1 in 10 young people out of work<sup>5</sup>.</li> <li>Harrow has one of the lowest proportions 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%<sup>6</sup>. (Now 1.2% August 2022<sup>7</sup>)</li> </ul> <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>The project will aim to be inclusive of all residents regardless of their age.</li> </ul>				
Disability	<ul style="list-style-type: none"> <li>The 2021 Census data shows that 9.75% of Harrow's population aged 15 to 64 years have a disability this equates to 16,840 people.</li> <li>There is a strong correlation between disability, in particular the extent of the disability, and economic inactivity.</li> <li>There are also particular groups that have specific obstacles in progressing to the labour market or sustaining self-employment. These include adults with learning disabilities and those with severe mental health issues.</li> <li>Disabled people are also likely to be under-represented among business owners within Harrow.</li> </ul> <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>The projects will aim to be inclusive of all residents regardless of their disability status.</li> <li>Where appropriate, the SFDF programme improvements will support the access needs of disabled people such as wheelchair users and those with</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>3</sup> Census 2021

<sup>4</sup> Poppi and Pansi projections to 2030

<sup>5</sup> DWP Job claimant data April 2021

<sup>6</sup> NEETS data at December 2020.

<sup>7</sup> NEETS data at December 2022.

	visual impairment e.g., review for level access showers where bathroom works are identified at the same time as energy efficiency measures.				
<b>Gender reassignment</b>	<ul style="list-style-type: none"> <li>In 2020, the Equality and Human Rights Commission (EHRC) survey found that one in six respondents identified themselves as prejudiced towards transgender people<sup>8</sup>.</li> <li>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.</li> <li>The charity Gender Identity Research &amp; Education Society (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.</li> </ul> <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>The SHDF programme will aim to be inclusive of all residents regardless of their gender reassignment status.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Marriage and Civil Partnership</b>	<ul style="list-style-type: none"> <li>At the time of the 2021 Census 53.9% of Harrow's residents were married or in a registered civil partnership, which was the highest level in London.</li> <li>21% of households were married, or in same-sex civil partnerships, with dependent children, the highest level in London.</li> <li>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.</li> </ul> <p><b>Impact</b></p> <p>The SHDF programme will aim to be inclusive of all residents regardless of their marriage and partnership status.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>8</sup> Equality and Human Rights Commission (2020), Attitudes transgender people, 2020

**Pregnancy and Maternity**

- ONS births figures show Harrow as having 3,312 live births in 2021<sup>9</sup>. 14 live births per 1000 population is higher than the England & Wales average of 10.8
- The borough has a higher-than-average infant mortality rate in London, at a rate of 3.9 deaths per 1000 live births, which is an indicator of poverty and inequality in the borough.<sup>10</sup>
- Nationally, women have faced discrimination during pregnancy and maternity in the workplace. EHRC Survey data shows that around one in nine mothers (11%) reported that they were either dismissed; made compulsorily redundant, where others in their workplace were not.

**Impact**

The SHDF programme will aim to be inclusive of all residents regardless of their pregnancy and maternity status, including residents with childcare/caring responsibilities.



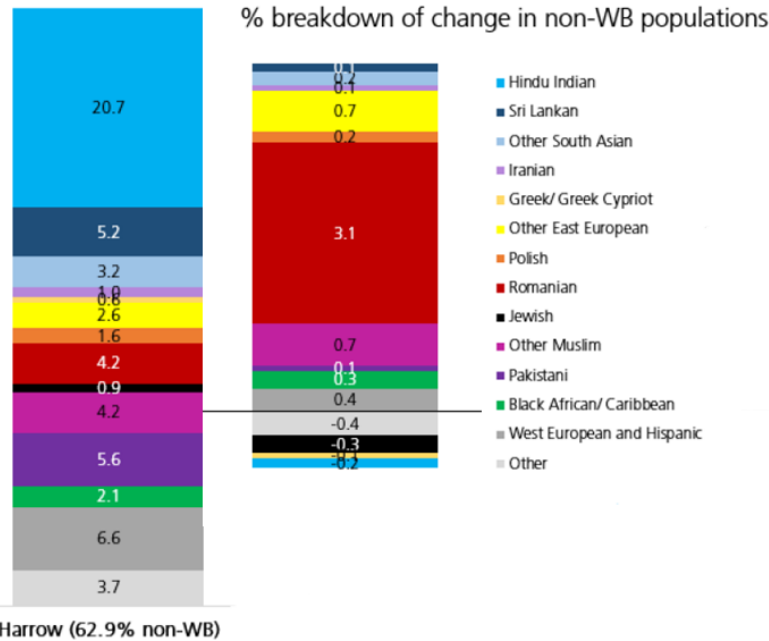
<sup>9</sup> Source: Office for National Statistics (ONS, 2022), Live births in England and Wales 2021

<sup>10</sup> Public Health England (2022), London's Poverty Profile 2022,



Race/  
Ethnicity

% breakdown of non-WB populations, 2019



- Harrow is one of the most culturally diverse local authorities in the UK, with over 60% of residents from Black, Asian, and Multi-Ethnic backgrounds and an estimated 20% Eastern European community, which is fast growing<sup>11</sup>. Black African (notably the Somali Community) groups have been fast growing over the last 6 years or so, as has the Afghan community.
- Unemployment rates are significantly higher in certain areas of the borough, particularly in the Wealdstone and Marlborough wards (central Harrow) and Roxbourne (south Harrow), focused in an around the Rayners Lane estate and among residents classified as Black and Other ethnic groups. These areas are also ranked high on the indices of deprivation for the UK.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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<sup>11</sup> Harrow Economic assessment 2019-2020: population

	<ul style="list-style-type: none"> <li>The majority of 16–18-year-olds that are classed as NEET are from Black and Multi Ethnic backgrounds and located in wards with high levels of deprivation. However, the data also shows that the single largest ethnic group of pupils aged 16-18 classed as NEET is White British.</li> <li>At ward level Marlborough, and Wealdstone have the highest number of households in need of re-housing. These respectively have a Black and Multi Ethnic population of 77% and 75%.</li> <li>The highest rates of overcrowding is in Greenhill ward (97.5 per 1,000 households) and a Black and Multi Ethnic population of 74% (2011 census).</li> <li>Over 94% of Harrow businesses are classed as micro-businesses. There is limited data on the profile of business ownership by protected characteristics. Anecdotal evidence suggests that most retail businesses in Harrow’s town centres are Black and Multi Ethnic owned.</li> </ul> <p><b>Impact</b> The SHDF programme will aim to be inclusive of all residents regardless of their race and ethnicity.</p>																		
<p><b>Religion or belief</b></p>	<ul style="list-style-type: none"> <li>Religious diversity is strong in Harrow. At the 2011 Census Harrow was the most religiously diverse borough in the country with the highest number of Hindus (25%) and Jains (2.2%) and the second highest number of Zoroastrians.</li> <li>At the 2021 census Harrow had the highest number (and proportion) of Hindu followers in the country (25.8%). At 2.8% Harrow 's Jewish community was the ninth largest nationally. 33.9% of residents described themselves as Christians (the 11th lowest proportion in the country) and 15.9% described themselves as Muslims. Harrow had the lowest ranking for ‘no religion’ (10.9%).</li> <li>As the population’s ethnic composition changes, rates of participation in various religions are also likely to change<sup>12</sup>.</li> <li>There is limited data on employment/unemployment rates for Harrow by religion.</li> <li>Data for London suggests that educational attainment and employment among the capital’s Muslim community is lower than those from other faith groups located in the borough<sup>13</sup>.</li> </ul> <div data-bbox="450 1222 1404 1596"> <p style="text-align: center;"><b>Harrow, Religion 2021 census</b></p> <table border="1"> <thead> <tr> <th>Religion</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Other religion</td> <td>0.6%</td> </tr> <tr> <td>Sikh</td> <td>1.1%</td> </tr> <tr> <td>Buddhist</td> <td>1.1%</td> </tr> <tr> <td>Jain</td> <td>2.4%</td> </tr> <tr> <td>Jewish</td> <td>2.8%</td> </tr> <tr> <td>Not answered</td> <td>5.9%</td> </tr> </tbody> </table> </div>	Religion	Percentage	Other religion	0.6%	Sikh	1.1%	Buddhist	1.1%	Jain	2.4%	Jewish	2.8%	Not answered	5.9%	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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	<p><b>Impact</b> The SHDF programme will aim to be inclusive of all residents regardless of their religion or beliefs.</p>				
Sex	<ul style="list-style-type: none"> <li>The 2021 census show that the total population of Harrow is now 261,300, made up of 132,500 women (50.7%) and 128,800 men (49.3%). Overall, the number of males and females living in Harrow is very similar.</li> <li>Economic activity among Harrow’s male population is higher than the London average at 86%, compared with 83%<sup>14</sup>. However, economic activity among females in the borough is lower than the London average at 72%.</li> <li>Harrow is a low wage borough, with those that are employed in the borough earning less than the London average weekly earnings of £813.40<sup>15</sup>. Women also earn less than men in the borough. The average gross weekly earnings among women working in Harrow is £480.10, this is 28% lower than the London average of £666<sup>16</sup>.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>12</sup> Harrow Economic Assessment: 2019-2020: population

<sup>13</sup> Annual Population Survey 2018.

<sup>14</sup> NOMIS: Labour supply (at December 2020)

<sup>15</sup> Source: NOMIS: earnings by place of work: 2021

<sup>16</sup> Source: NOMIS: earnings by place of work: 2021

	<ul style="list-style-type: none"> <li>• 20% of Harrow businesses are female led.<sup>17</sup></li> <li>• 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.</li> </ul> <p><b>Impact</b> The SHDF programme will aim to be inclusive of all residents regardless of their sex.</p>				
<b>Sexual Orientation</b>	<ul style="list-style-type: none"> <li>• The Office for National Statistics estimated in 2014, 2.6% of Londoners identify as lesbian, gay, or bisexual, the highest of any UK region<sup>18</sup>. There is no official data on sexual orientation for Harrow in relation to employment.</li> <li>• LGBTQIA+ people are also likely to be underrepresented among business owners within Harrow.</li> </ul> <p><b>Impact</b> The projects will aim to be inclusive of all residents regardless of their sexual orientation.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**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   

<sup>17</sup> Beauhurst: number of companies registered at Companies House that are female led (April 2021)

<sup>18</sup> Trust for London: London’s Poverty profile 2016.

If you clicked the Yes box, Include details in the space below

Supplementary note: As the SHDF programme will tackle fuel poverty through the installation of fabric first measures, a proportion of vulnerable residents will be consulted as part of the PAS2035 survey process. These groups will be provided with tariff management advice to ensure they are able to maximise the benefits of completed works.

### 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 <b>each</b> 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

#### Include details in the space below

1. The SHDF programme will not result in any direct or indirect discrimination of any group that shares the protected characteristics.

#### 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

