

Appendix 2 - Full Equality Impact Assessment (EqIA)

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 form and assessment.

What are the proposals being assessed? (Note: 'proposal' includes a new policy, policy review, service review, function, strategy, project, procedure, restructure)	Proposal to lease 27 Northolt Road (a Council building) to CARRAMEA (a voluntary sector organisation).
Which Directorate / Service has responsibility for this?	Place Shaping and Community Health and Well-Being have joint responsibility for this proposal. The service areas involved are Community and Culture, Housing, and Property Services.
Name and job title of lead officer	Kashmir Takhar
Name & contact details of the other persons involved in the EqIA:	Belinda Prichard Maggie Challoner Tony O'Hara, Trustee of Carramea
Date of assessment:	

Stage 1: Overview

<p>1. What are the aims, objectives, and desired outcomes of your proposals?</p> <p>(Explain proposals e.g. reduction / removal of service, deletion of posts, changing criteria etc)</p>	<p>The aim is to lease 27 Northolt Road (also known as Community Premises) to a voluntary sector organisation called Carramea (Consortium of Anti-Racist, Refugee and Minority Ethnic Associations). The desired outcomes are;</p> <ul style="list-style-type: none"> • To transfer management of the building from the Council to a community organisation. • To support a community organisation in managing a Council-owned asset for use by a wide range of voluntary groups in the borough.
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	<p>This building is currently owned and managed by the Council and offers an office base to 27 organisations. These organisation benefit from either an individual office, designated desk space, casual use of a desk space, postal address or 'as-and-when' use of counselling and meeting rooms. This facility is currently provided free of charge to these organisations, however in the current difficult financial climate the Council must review all budgets and it is unlikely that the Council would be able to continue to provide this facility at no charge to these organisations in the future.</p> <p>Carramea's proposal for managing the building is to offer affordable, flexible office space to more than 100 voluntary organisations in the borough. The facilities will include hourly hire of desk space, meeting rooms, counselling rooms and IT training facilities. The hire charge will include use of IT, switchboard and reception services including a mail handling service. The facilities will be managed by CARRAMEA who have secured funding to undertake some refurbishment including the installation of up-to-date IT facilities as well as funding for a Centre Manager.</p>
<p>2. What factors / forces could prevent you from achieving these aims, objectives and outcomes?</p>	<p>Factors that could prevent us from achieving these aims are;</p> <ul style="list-style-type: none"> • The lease transfer is not approved by Cabinet. • Carramea are unable to manage the building effectively. • Voluntary sector organisations are unable to pay the new hire charges.
<p>3. Who are the customers? Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.</p>	<p>The customers affected by this proposal are; the Council, Carramea, existing and other potential users of Community Premises.</p>
<p>4. Is the responsibility shared with another department, authority or organisation? If so:</p> <ul style="list-style-type: none"> • Who are the partners? • Who has the overall 	<p>The responsibility is shared between Community and Cultural services, Property Services and Housing.</p>

responsibility?	
4a. How are/will they be involved in this assessment?	
Stage 2: Monitoring / Collecting Evidence / Data	
<ul style="list-style-type: none"> • 5. What information is available to assess the impact of your proposals? Include the actual data, statistics and evidence (including full references) reviewed to determine the potential impact on each equality group (protected characteristic). This can include results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys, workforce profiles, service users profiles, local and national research, evaluations etc • (Where possible include data on the nine protected characteristics. Where you have gaps, you may need to include this as an action to address in the action plan) 	
Age (including carers of young/older people)	<ul style="list-style-type: none"> • Consultation on the future of Council support to the voluntary sector, including Community Premises. Results of the consultation can be found at; http://www.harrow.gov.uk/www2/documents/g60292/Public%20reports%20pack,%20Wednesday%202-Mar-2011%2019.30,%20Grants%20Advisory%20Panel.pdf?T=10 <p>The results of the consultation show that 65% agree that organisations should pay for this provision and 75% agree that provision, such as a resource centre/s or drop-in venue/s possibly, run by organisations themselves should be identified in the borough.</p> <p>Respondents were asked whether or not they thought the proposed changes would impact differently on one more of the following groups; age, disability, race, gender, gender identity, religion or belief or sexual orientation? 42% said yes and 50% said no.</p> <ul style="list-style-type: none"> • Feedback from Community Premises User groups supported community management of the building and recognition that in future organisations would need to pay for this provision. • Carramea’s consultation with Community Premises User Groups indicates strong support for the community management proposals. The consultation has included consultation on the proposed hire charges which the groups have indicated are affordable.

	<ul style="list-style-type: none"> • Previous consultations with voluntary sector organisations has indicated a high demand and low availability of affordable, flexible office space. The response from voluntary groups to a recent advertisement for vacant office space in a shared building, demonstrated that the demand for this type of shared facility exists. • Information available from other boroughs that have set up similar types of resource centres, indicates that there will be sufficient demand for this type of facility. In the current financial climate organisations are increasingly looking for office facilities that are flexible and those where there are opportunities for shared costs eg. IT, photocopier etc.
Disability (including carers of disabled people)	<ul style="list-style-type: none"> • As above
Gender Reassignment	<ul style="list-style-type: none"> • As above
Marriage / Civil Partnership	<ul style="list-style-type: none"> • As above
Pregnancy and Maternity	<ul style="list-style-type: none"> • As above
Race	<ul style="list-style-type: none"> • As above
Religion and Belief	<ul style="list-style-type: none"> • As above
Sex / Gender	<ul style="list-style-type: none"> • As above
Sexual Orientation	<ul style="list-style-type: none"> • As above
<ul style="list-style-type: none"> • 6. Is there any other (local, regional, national research, reports, media) data sources that can inform this assessment? • Include this data (facts, figures, evidence, key findings) in this section. 	<ul style="list-style-type: none"> •

- 7. Have you undertaken any consultation on your proposals? (this may include consultation with staff, members, unions, community / voluntary groups, stakeholders, residents and service users)

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NOTE: If you have not undertaken any consultation as yet, you should consider whether you need to. For example, if you have insufficient data/information for any of the protected characteristics and you are **unable** to assess the potential impact, you may want to consult with them on your proposals as how they will affect them. Any proposed consultation needs to be **completed before** progressing with the rest of the EqIA. **Guidance on consultation/community involvement toolkit can be accessed via the link below**
http://harrowhub/info/200195/consultation/169/community_involvement_toolkit

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different equality groups (protected characteristics)?	What action are you going to take as a result of the consultation? This may include revising your proposals, steps to mitigate any adverse impact. <i>(Also Include these in the Improvement Action Plan at Stage 5)</i>
Community Premises User Groups	Focus group meeting Consultation meetings with Carramea	Support for community management of the building.	Current users are being kept informed of progress with this proposal. Users have also been consulted on the proposed hire charges and are being supported by CARRAMEA with submitting funding applications to secure ongoing revenue funding.
Voluntary sector organisations	On-line survey Focus group meetings Consultation workshop	Groups support the idea that organisations based at Community Premises should pay for this provision, as well as the need for a resource centre run by organisations themselves.	CARRAMEA is being supported in the development of its proposal by the Interim CVS service and other bodies. CARRAMEA has plans for consulting with the wider sector.
Members of the Grants Advisory Panel (GAP).	The results of the consultation were shared with GAP members	GAP Members were positive about the progress that had been	An update report will be presented to GAP Members in September.

	at their meeting of 2 nd March 2011.	made to the grants process, Community Lettings and Community Premises. It was felt that there had been a noticeable shift in public opinion and that the Council's relationship with the Voluntary and Community Sector had improved.	
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Stage 3: Assessing Impact and Analysis

8. What does your information 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	Positive	Adverse	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 eliminate or reduce the adverse impact(s)? E.g. consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 5)
Age (including carers of young/older people)	√		17 out of 27 organisations currently based at Community Premises serve the needs of people within this group. Carramea's proposal for management of the building aims to ensure that most of the groups currently based there will continue to operate from these premises.	The Council, Interim CVS and others are supporting CARRAMEA with the development of their proposals. A project group has been established that will continue to offer support and monitor the progress of this project to ensure that target groups continue to benefit from the facility.
Disability (including carers of disabled people)	√		7 out of the 27 organisations currently based at Community Premises serve the needs of people within this group. Carramea's proposal for management of the building aims to ensure that most of the groups currently based there will continue to operate from these premises.	As above
Gender Reassignment	√		Currently none of the groups currently based at Community Premises serve the needs of people within this group. Carramea's proposals are to increase the use of this building by a wide range of community organisations to cover all protected characteristics. The proposals offer the potential	As above

			for organisations serving this group to make use of the building in the future.	
Marriage and Civil Partnership	√		18 out of 27 organisations currently based at Community Premises serve the needs of people within this group. Carramea's proposal for management of the building aims to ensure that most of the groups currently based there will continue to operate from these premises.	As above
Pregnancy and Maternity	√		18 out of 27 organisations currently based at Community Premises serve the needs of people within this group. Carramea's proposal for management of the building aims to ensure that most of the groups currently based there will continue to operate from these premises.	As above
Race	√		25 out of 27 organisations currently based at Community Premises serve the needs of people within this group. Carrameas proposal for management of the building aims to ensure that most of the groups currently based there will continue to operate from these premises.	As above
Religion or Belief	√		3 out of 27 organisations currently based at Community Premises have a primary focus on people within this group. Carramea's proposal for management of the building aims to ensure that most of the groups currently based there will continue to operate from these premises, so that these needs continue to be served.	As above
Sex	√		One of the organisations currently using Community Premises facilities serves the needs of people within this group. Carramea's proposal for management of the building aims to ensure that most of the groups currently based there will continue to operate from these premises. The proposals also aim to ensure that the building is	As above

			used by an increased number and range of organisations covering all protected characteristics.	
Sexual Orientation	√		None of the groups currently based at Community Premises serve the needs of people within this group. Carramea's proposals are to increase the use of this building by a wide range of community organisations covering all protected characteristics. There is potential for organisations serving this group to make use of the building in the future.	As above
Other (please state)				
<p>9. Cumulative impact – Are you aware of any cumulative impact? For example, when conducting a major review of services. This would mean ensuring that you have sufficient relevant information to understand the cumulative effect of all of the decisions. Example: A local authority is making changes to four different policies. These are funding and delivering social care, day care, and respite for carers and community transport. Small changes in each of these policies may disadvantage disabled people, but the cumulative effect of changes to these areas could have a significant effect on disabled people's participation in public life. The actual and potential effect on equality of all these proposals, and appropriate mitigating measures, will need to be considered to ensure that inequalities between different equality groups, particularly in this instance for disabled people, have been identified and do not continue or widen. This may include making a decision to spread the effects of the policy elsewhere to lessen the concentration in any one area.</p>			<p>Ongoing feedback from the voluntary sector suggest that there is a general shortage of affordable and flexible office space that suits the needs of voluntary and community sector organisations. This proposal helps address this issue.</p>	
<p>10. How do your proposals contribute towards the requirements of 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>				

(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	Are there any actions you can take to meet the PSED requirements? <i>(List these here and include them in the Improvement Action Plan at Stage 5)</i>
Some of the organisations based at Community Premises that are likely to continue using this facility under the proposed community management arrangement provide support to victims of unlawful discrimination, harassment and victimisation.	Most of the organisations currently based at Community Premises and who are likely to continue using the facility under the proposed community management arrangements work to advance equality of opportunity between people from different groups.	Most of the organisations currently based at Community Premises and who are likely to continue using the facility under the proposed community management arrangements deliver activities that foster good relations between people from different groups.	By supporting this proposal the Council is enabling these groups to continue delivering services that meet the PSED requirements.

11. Is there any evidence or concern that your proposals may result in a protected group 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)?

	Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Yes									
No	√	√	√	√	√	√	√	√	√

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.

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 4: Decision

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

Outcome 1 – No change required: when the EqIA has not identified any potential for unlawful conduct or adverse impact and all opportunities to enhance equality are being addressed.	√
Outcome 2 – Minor adjustments to remove / mitigate adverse impact or enhance 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 5</i>	
Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to enhance 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 12a below)	
Outcome 4 – 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)	
12a. If your EqIA is assessed as outcome 3 or have ticked ‘yes’ in Q11, explain your justification with full reasoning to continue with your proposals.	

Stage 5: Making Adjustments (Improvement Action Plan)

13. 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 proposed	Desired Outcome	Target Date	Lead Officer	Progress
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Potential positive impact on all groups.	Ongoing monitoring of project.	A range of voluntary organisations are supported with their accommodation needs.	January 2013 onwards	Kashmir Takhar	Project monitoring group established and meets monthly.

Stage 6 - Monitoring

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

14. How will you monitor the impact of the proposals once they have been implemented? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 5)</i>	This project will be monitored by Community and Culture to ensure that it achieves its aims of providing affordable, flexible office space to a range of organisations, including those already based at these premises.			
15. Do you currently monitor this function / service? Do you know who your service users are?	Yes	√	No	
16. What monitoring measures need to be introduced to ensure effective monitoring of your proposals? <i>(Also Include in Improvement Action Plan at Stage 5)</i>	A project group including CARRAMEA, officers from Community and Culture, Policy and Partnerships and Housing has been established and will continue to meet.			
17. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 5)</i>	The results of monitoring will be reported to the Community Health and Well-Being DMT.			

<p>18. Have you received any complaints or compliments about the policy, service, function, project or proposals being assessed? If so, provide details.</p>	<p>Feedback from Community Premises User Groups support the proposals. Consultation with these groups is ongoing.</p>		
<p>Stage 7 – Reporting outcomes</p>			
<p>The completed EqlA must be attached to all committee reports and a summary of the key findings included in the relevant section within them.</p>			
<p>EqlA's will also be published on the Council's website and made available to members of the public on request.</p>			
<p>19. Summary of the assessment</p> <p>NOTE: This section can also be used in your reports, however you must ensure the full EqlA is available as a background paper for the decision makers (Cabinet, Overview and Scrutiny, CSB etc)</p> <p>What are the key impacts – both adverse and positive? Are there any particular groups affected more than others? Do you suggest proceeding with your proposals although an adverse impact has been identified? If yes, what are your justifications for this? What course of action are you advising as a result of this EqlA?</p>	<p>This assessment does not identify any adverse impact on the protected characteristics. The assessment identifies the potential for a positive impact on these groups as many of the organisations that are likely to make use of this facility when it is leased to, and managed by CARRAMEA serve the needs of people with the protected characteristics.</p>		
<p>20. How will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc</p>	<p>The impact assessment will be publicised on the Harrow Council website.</p>		
<p>Stage 8 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)</p>			
<p>The completed EqlA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.</p>			
<p>21. Which group or committee considered, reviewed and agreed the EqlA and the Improvement Action Plan?</p>			
<p>Signed: (Lead officer completing EqlA)</p>		<p>Signed: (Chair of DETG)</p>	
<p>Date:</p>		<p>Date:</p>	