

## TEMPLATE 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? ( <b>Note:</b> ‘proposal’ includes a new policy, policy review, service review, function, strategy, project, procedure, restructure)	Proposals for changing certain types of council tax discounts and exemptions as part of the Technical reforms to Council Tax.
Which Directorate / Service has responsibility for this?	Resources
Name and job title of lead officer	Fern Silverio
Name & contact details of the other persons involved in the EqIA:	Lynn Allaker – Service Manager Revenues Tel 020 8424 1920 <a href="mailto:Lynn.allaker@harrow.gov.uk">Lynn.allaker@harrow.gov.uk</a>
Date of assessment:	25 <sup>th</sup> September 2012

### 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>Part of the Local Government Resource Review covered both the technical reforms of Council Tax and also the replacement of the Council Tax Benefit scheme with a Local Council Tax Reduction scheme. Central Government’s intention was to provide local authorities with the ability to raise additional sources of income to support the funding gap created by the changes to funding arrangements.</p> <p>The proposal covers the following:</p> <ul style="list-style-type: none"> <li>- Abolition of Class A (empty and uninhabitable or requiring/undergoing major repairs for a period of up to 12 months) and the discretion to Local Authorities to set a discount of between 0% and 100%</li> <li>- Abolition of Class C (empty and unfurnished for a period up to 6 months) and the discretion to Local Authorities to set a discount of between 0% and 100% for a variable time period up to a maximum of 6 months</li> <li>- Discretion to Local Authorities to charge 100% on second homes</li> </ul>
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	<ul style="list-style-type: none"> <li>- Abolition of Class L and amendments to the liability to the mortgagee in possession</li> <li>- Discretion to Local Authorities to raise a 'surcharge' levy of up to 50% ( i.e. total charge 150%) on long term empties defined as over 2 years</li> </ul> <p>Initial calculations suggested that approximately £620K could be obtained by maximising the income streams for each of the above. The determination needs to be made by members as part of the tax setting process so that the correct demands can be issued by 1<sup>st</sup> April 2013 and any additional income considered for the budget calculations for 2013-14.</p>
<p><b>2.</b> What factors / forces could prevent you from achieving these aims, objectives and outcomes?</p>	<p>Delays in regulations being laid  Lack of agreement  Negative feedback from consultation  Property owners and developers choosing not to invest in property within LB of Harrow</p>
<p><b>3.</b> 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>Primarily owners of second properties, housing associations, landlords, LB Harrow Housing Department, taxpayers whose property has been repossessed, banks and building societies. Should the maximum income stream options not be agreed, then all other council taxpayers in the borough if the Band D charge increases due to this.</p>
<p><b>4.</b> Is the responsibility shared with another department, authority or organisation? If so:</p> <ul style="list-style-type: none"> <li>• Who are the partners?</li> <li>• Who has the overall responsibility?</li> </ul>	<p>The responsibility for the development of the policy is shared with Corporate Finance and Collections  Councillors are responsible for deciding whether the changes that have been proposed will be implemented  Collections and Access Harrow will be responsible for the implementation of the policy if the proposals are agreed.</p>
<p><b>4a.</b> How are/will they be involved in this assessment?</p>	<p>A presentation was made to CLG (Corporate Leadership Group) on 24<sup>th</sup> July 2012 and a general steer on maximising the potential income was agreed. Legal agreed the broad outline for a consultation to take place for 6 weeks from 13<sup>th</sup> August 2012 to 21<sup>st</sup> September 2012. It is intended that the outcome and report are shared with</p> <ul style="list-style-type: none"> <li>a) the Welfare Reform Project Board on 12<sup>th</sup> October 2012</li> <li>b) the Councillor Policy Group between 13<sup>th</sup> October 2012 and 6<sup>th</sup> November 2012</li> </ul>

c) the Corporate Strategic Board between 13<sup>th</sup> October 2012 and 6<sup>th</sup> November 2012

Meetings have taken place with the Housing Department who have fed into the Consultation process. Invites were issued to the main Housing Associations and local Estate Agents to attend two workshops arranged for 4<sup>th</sup> & 5<sup>th</sup> September 2012.

A random selection of 500 residents were mailshot to invite them to complete an online survey.

**Stage 2: Monitoring / Collecting Evidence / Data**

**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)	Online consultation feedback & Harrow Churches Association feedback.
Disability (including carers of disabled people)	Online consultation feedback & HADS feedback
Gender Reassignment	Online consultation feedback
Marriage / Civil Partnership	Online consultation feedback
Pregnancy and Maternity	Online consultation feedback
Race	Online consultation feedback
Religion and Belief	Online consultation feedback
Sex / Gender	Online consultation feedback

Sexual Orientation	Online consultation feedback
<p>6. Is there any other (local, regional, national research, reports, media) data sources that can inform this assessment?</p> <p>Include this data (facts, figures, evidence, key findings) in this section.</p>	<p>DCLG (Department of Communities &amp; Local Government) Consultation – October 2011</p> <p>DCLG summary of Responses report – May 2012</p> <p>DCLG Impact Assessment Local Government Finance Bill –December 2011</p> <p>See below extract:</p> <p><b>Impact on individual claimants</b></p> <p>31. <i>The proposals set out under paragraphs 1 (a), (b) and (c) give additional flexibility to authorities to set discounts on certain properties. Authorities will use this to maximise their revenue (or minimise a general increase in council tax). Affected taxpayers will face higher bills than they otherwise would have (or where exemptions previously applied, a tax liability will arise where there was none before).</i></p> <p>32. <i>Some people may consider it unfair that others in similar circumstances will receive a different level of discount just because they are in a different local authority to them. However that is a consequence of relinquishing central control.</i></p> <p><b>The impact on different council tax payer groups</b></p> <p>33. <i>The main impacts are likely to be as follows:</i></p> <p>a. <i>Owners of second homes are currently liable to pay between 50% and 90% of a normal council tax bill (depending on the exercise of the local authority’s discretion). Once these changes are enacted, they will be liable to between 50% and 100%. The entitlement to a 50% discount enjoyed by taxpayers who have a second home because one of their homes is job-related will not be affected.</i></p> <p>b. <i>Owners of unoccupied, unfurnished dwellings which are awaiting, undergoing or have just undergone major repair or structural alteration currently have no liability to pay council tax for up to 12 months. This is Class A exemption. Once these changes are enacted they will be liable to between 0% and 100% of the full bill.</i></p> <p>c. <i>Owners of other unoccupied, unfurnished dwellings currently enjoy an exemption (Class C) of up to 6 months. They too will become liable to pay between 0% and 100% of a full bill once these flexibilities are in place.</i></p> <p>d. <i>Owners of empty dwellings that have been repossessed by a mortgagee</i></p>

	<p>currently have no liability to council tax. This is Class L exemption. Mortgagees are never liable. The changes being contemplated would make the mortgagees liable for council tax in preference to the owners. Class L exemption would become otiose.</p> <p><b>Impact on administration costs</b></p> <p>34. The loss of exemptions, and higher bills for those people affected may increase enforcement costs, but the impact will be small, and heavily dependent on the extent to which authorities use the new flexibilities.</p> <p>35. There may also be transitions costs for changing the systems that local authorities will apply these changes.</p> <p>London Revenues Group Surveys</p> <p>Local Information System</p>
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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)	Yes	yes	No	
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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](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>
Housing Department	Meetings and briefing notes	No formal response received other than comments fed into initial report to CLG	Work with the Housing Department on an awareness campaign of the grants and assistance available to private

		<p>summarised as  <i>We understand the pressures facing the General Fund and don't have any objections to the exemptions or discounts being removed. It makes absolute sense at a time of housing supply shortage to minimise the time empty properties are kept empty and therefore removing the discount should encourage private landlords to bring their properties into use as quickly as possible.</i></p> <p><i>However, It is a myth that all private landlords are wealthy and some are local people and as such, this is their local business; something that members want to support.</i></p> <p><i>Housing needs the private sector and we have been working with them to improve standards and encourage them to use Harrow as their managing agent of choice which obviously brings in an income.</i></p>	<p>landlords via the Help2let and Empty Homes Unit.</p> <p>Whilst a concern has been raised that it may lead to higher rents there is no information that this may affect one group more than any other.</p>
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		<i>landlords to turn their properties around quickly; this would also be a much better presentational message.</i>	
Housing Associations	Mailshot to attend workshop and/or complete online survey	2 Housing Associations responded, 1 online and 1 by letter. Both indicate that the proposals for the Class C and Class A exemptions would result on the additional cost being unfair and potentially passed on to the tenants through increases in rent. As the clients are primarily people who may be deemed vulnerable for a number of reasons who require support via social housing, this may impact on particular protected groups but no data is available.	One Housing Association is referring to the restrictions placed upon properties being relet due to the authority holding nomination rights to their vacancies. However this affects all housing associations and Housing have confirmed that they endeavour to nominate as soon as possible.
Local Estate Agents	Mailshot to attend workshop and/or complete online survey	2 estate agents responded to the online survey of which one felt it was unfair to charge on empty properties on the basis that this does not use services and proposed reverting to a local taxation scheme similar to Poll Tax. The other only commented on the proposed surcharge of 50% where properties have been empty for 2 years or more. Neither of these comments	



		impact on any protected characteristics	
Local Landlords	Mailshot to complete online survey	23 Private landlords responded online and 1 by letter. 14 of these had up to 5 properties and 10 more than 5 properties. The majority of the comments were that this was unfair to landlords who have to refurbish properties between lets and that this could divert landlords from investing in properties within LBH. One referred to carrying out work via the empty homes or better homes fund arrangements.	Work with Housing to increase awareness of potential grants and funding opportunities for landlords including Help2Let and Empty Homes Unit and any other Housing Initiatives to bring properties back into use.
Mortgage lenders, Property related businesses, organisations representing the property industry, charities, local authorities, organisations representing local authorities, town and parish councils, MPs and MEP's, Political parties, public including landlords	DCLG Consultation	Not specifically reported in DCLG impact assessment	
500 random Council Tax Payers	Online survey	Comments in general did not identify any impact on the protected characteristics with the exception of the potential impact on the housing market should property owners cease to invest in LBH if the maximum proposed changes are introduced.	

### 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)			The analysis of the online survey respondents shows no adverse impact however Harrow Churches Housing Association has stated that they provide accommodation for older persons. No information has been provided on the percentage of properties that are used for this purpose nor is there any indication that they would cease to provide accommodation to this type of client if the changes were introduced.	Low income pensioners will continue to receive support via the Council tax Local Support and Housing Benefit/Universal Credit via the Welfare Reform. Those pensioners who are not on full welfare benefits may be affected should rents increase. The current exemptions for properties left empty due receiving or providing care elsewhere are not affected by these proposals.
Disability (including carers of disabled people)			The analysis of the online survey respondents shows no adverse impact however Harrow Churches Housing Association has stated that they provide accommodation for frailer older persons who have higher support needs and also families living with incurable diseases. No information has been provided on the percentage of properties that are used for this purpose nor is there any indication that they would cease to provide accommodation to this type of client if the changes were introduced. HADs have responded and stated that where the property is empty because <ul style="list-style-type: none"> <li>- someone is in hospital or other type of care and planning to return home at any point or</li> <li>- someone is in hospital or other type of care and will not be able to return home but is unable to manage their affairs</li> <li>- someone else is dealing with their affairs but</li> </ul>	Housing could be requested to obtain information regarding disability of their tenants from all social housing providers as at this point to obtain a benchmark so that any impact can be measured.  The current regulations allow for an exemption to be given if someone has left their home permanently to receive care whether that is in a hospital or other formal provider of care or with a relative and there is no proposal for that to be changed. Further work could be done with HADS to increase awareness of this.  DCLG is currently re-consulting on the types of empty properties which may be subject to the 150% premium and HADS comments could be passed to them as part of the Council's response.  The current exemptions for properties left empty

			<p>badly</p> <ul style="list-style-type: none"> <li>- they are waiting for adjustments to their home to make it possible to live in after an acquired or increased disability</li> </ul> <p>They should not be penalised by paying 150% of the charge and should in many cases not pay any council tax at all.</p>	due receiving or providing care elsewhere are not affected by these proposals but only affect where it is a permanent move if receiving care .
Gender Reassignment			The analysis of the online survey respondents shows no adverse impact.	
Marriage and Civil Partnership			The analysis of the online survey respondents shows no adverse impact.	
Pregnancy and Maternity			The analysis of the online survey respondents shows no adverse impact.	
Race			An analysis of the private landlords who responded shows that there is higher percentage of Pakistani and Indian landlords who have completed the online survey measured against the borough statistics from the Local Information System. This may however be distorted due to the low number of returns (23)	The council will work with the voluntary sector to ensure that the awareness campaign is inclusive
Religion or Belief			The analysis of the online survey respondents shows no adverse impact.	
Sex			The analysis of the online survey respondents shows no adverse impact.	
Sexual Orientation			The analysis of the online survey respondents shows no adverse impact.	
Other (please state)				
<p><b>9. Cumulative impact – Are you aware of any cumulative impact?</b> For example, when conducting a major review of services. This would mean ensuring that you have sufficient relevant information to</p>			<p>There is likely to be a cumulative impact as the Welfare Reform Act 2012 proposes to make major changes to the Benefits system. This project is a</p>	

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.

workstream of the Welfare Reform Project Board where Harrow Council services and partners are working together to identify the impacts of all the proposed changes.

Listed below are the changes within the Welfare Reforms and a summary of the who these could effect:

- **Removal of the £15 excess payment to tenants who rented a property below the LHA rate** - these changes could affect all groups equally and could affect 9% of Housing Benefit claimants
- **Increase in the deduction for non dependants** – this change could affect Council Tax Benefit claimants who have one or more non dependants living in a household as a result of the non dependants having to increase their contribution
- **Under 35s restriction to a room in shared house** – this change will affect people who live in self-contained accommodation who remain in the accommodation further to the changes being implemented.
- **Capping the Local Housing Allowance to the rate of a 4 bed house** – this change will affect Council Tax Benefit claimants with larger families. A percentage of Adult Social Care users who also claim Council Tax Benefit will be affected by these changes.
- **Overall benefit cap** – the capping of total benefits will affect a percentage of Council Tax Benefit claimants and would have the greatest impact on families with 3 or more children. A % of Adult Social Care users that are also claiming Council Tax Benefit will be affected by the benefit caps.

Should rents increase as part of this proposal, this will be in addition to the above changes.

Other areas which may also have possible cumulative impacts have been identified via the work on the Council tax Local Support Scheme as:

**Community Health and Wellbeing (Adults)** – possibility of a cumulative

impact as a result of the introduction of the Contributions Policy.

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There are 4001 clients of Adult Social Care. Of this number there are approximately 1,266 who are in community based settings and receiving Council Tax Benefit however approximately 75% of these are pensioners. The remaining 25% working age Adult Social Care clients are living in a household that is receiving Council Tax Benefit and therefore could be affected by the changes.

Over 50% of these Adult Social Care users that are impacted by the changes to Council Tax Benefits live in social housing so could be affected by multiple benefit impacts.

**Duty to prevent homelessness** - Impact of Council Tax Benefit changes could contribute to Harrow's homelessness duties if Council Tax Claimants are made homeless

- Because of additional financial pressure due to multiple changes
- Because of recovery of Council Tax Benefit arrears or inability to pay rent because of Council Tax debt.

Groups that may be impacted by these changes could be:

- Large families
- Ethnic minority families; and
- Lone parents

However the proposed changes in this policy would work to bring more properties into use to try and reduce the above identified impact.

**The Child Poverty Act 2010** - places a duty on local authorities and their partner authorities to work together to reduce the impacts of child poverty in the local area. As required Harrow Council will take into account the local child poverty needs assessment in designing and developing the localised scheme.

		<p>Impacts of the Council Tax Benefit changes could disproportionately impact the following groups:</p> <ul style="list-style-type: none"> <li>- Children due to increased poverty levels. Where risk of unemployment evidence shows families are at higher risk of turning to substance/alcohol misuse.</li> <li>- Care leavers who could be moving from supported living arrangements into their own accommodation.</li> </ul> <p>The new operating model within Children &amp; Families Services will deliver improved co-ordination of services, earlier identification of problems and swift effective early help.</p>	
<p><b>10.</b> 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> <p>(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)</p>			
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>
Cross reference to the EQIA completed for the Local Council Tax Support Scheme.	By bringing properties back into use more promptly this will support the Housing aims to reduce homelessness. Additionally the revenues raised will support the Council objective to support those most in need.		

**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)

<b>Outcome 1</b> – 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.	
<b>Outcome 2</b> – 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>	√
<b>Outcome 3</b> – 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. <b>(explain this in 12a below)</b>	
<b>Outcome 4</b> – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	

**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.

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**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
Age and Disability	Feed to Housing concerns raised about delays in the nomination process. Awareness campaign on exemptions which are not affected by proposals	That there is no reduction in the current breakdown of vulnerable clients being supported in this way	31 <sup>st</sup> January 2013  30 <sup>th</sup> June 2013	Lynn Allaker  Lynn Allaker	
Age and Disability	Work with volunteer organisations to increase awareness of reductions available to council taxpayers	That vulnerable customers are aware of what reductions they may be entitled to.	30 <sup>th</sup> June 2013	Lynn Allaker	
Race	The council will work with the voluntary sector to ensure that any awareness campaign is inclusive	That there is no disadvantage caused by inadequate communication of any changes in policy	31 <sup>st</sup> January 2013	Lynn Allaker	
All	Request enhancement to Northgate Revenues system to hold EQ information on all liable parties.	Ability to analyse council tax base	31 <sup>st</sup> January 2013	Lynn Allaker	



## 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>	Monitoring information from Housing on Social Housing Providers. Budget impact and additional yield raised to support council services		
15. Do you currently monitor this function / service? Do you know who your service users are?	Yes		No Y
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>	Endeavour to attend to discuss impact of proposals with the Harrow Supporting People Forum and Private Landlords Forum within 12 months of the implementation of the policy		
17. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 5)</i>			
18. Have you received any complaints or compliments about the policy, service, function, project or proposals being assessed? If so, provide details.	See general comments in report.		

## Stage 7 – Reporting outcomes

The completed EqIA must be attached to all committee reports and a summary of the key findings included in the relevant section within them.

EqIA's will also be published on the Council's website and made available to members of the public on request.

19. Summary of the assessment  <b>NOTE:</b> This section can also be used in your reports, however you must ensure the full EqIA is available as a background paper for the decision makers (Cabinet, Overview and Scrutiny, CSB etc)  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 EqIA?	See cabinet report.
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20. How will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc	Part of cabinet report.		
<b>Stage 8 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)</b>			
<b>The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.</b>			
21. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	Resources ETG		
Signed: (Lead officer completing EqIA)	Lynn Allaker <i>L Allaker</i>	Signed: (Chair of DETG)	
Date:	29/10/2012	Date:	