

## APPENDIX 4a: Grants to Move Scheme EqIA v3

### 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)	Grants to move scheme
Which Directorate / Service has responsibility for this?	Community Health & Wellbeing – Housing Services
Name and job title of lead officer	Scott Bryant – Housing Strategy Project Manager
Name & contact details of the other persons involved in the EqIA:	<p>Jane Fernley – Housing Partnerships &amp; Strategy Manager  Roz Seedburgh – Resident Services Project Co-ordinator  Candis Skinner – Under-Occupation Co-ordinator  Nadeem Din – Strategy &amp; Performance Manager  Jacky Souter – Housing Provision Manager  Tazafar Asghar – Barrister, Litigation  Carol Yarde – Head of Transformation</p> <p>Housing Services Senior Management Team</p>
Date of assessment:	Started April 16 <sup>th</sup> , 2012

## Stage 1: Overview

1. What are the aims, objectives, and desired outcomes of your proposals?

(Explain proposals e.g. reduction / removal of service, deletion of posts, changing criteria etc)

In light of changing national and local contexts, including changes to welfare benefits and an increasing demand for social housing in the borough, the grants to move scheme is being proposed to promote and incentivise mobility within Harrow Council's housing stock. Specifically, it aims to:

- Increase the choices available to council tenants and enable them to better meet their housing aspirations;
- Release family-sized accommodation for re-letting, allowing the Council to help those households that are homeless or in housing need;
- Encourage under-occupying tenants to downsize to homes more suited to their needs, freeing-up accommodation for over-crowded households or those affected by the changes to welfare benefits, including the housing benefit 'bedroom tax';
- Offer an alternative to tenants considering exercising their right to buy.

The scheme will consist of a series of cash grants to enable tenants to move should they wish to do so.

Grants will be available for:

- Moves to downsize within the social housing sector;
- Moves into the private rented sector;
- Private sector home purchases.

Fundamental to the scheme is that it is entirely voluntary, and just one of a number of options available to Council housing tenants.

In order to be eligible for the scheme, tenants must:

- Have held a tenancy with the Council for at least 12 months<sup>1</sup>;
- Have conducted their tenancy in a satisfactory manner, and not have been served a notice to seek possession of the property as a result of anti-social behaviour. The cost of any rechargeable repairs and any outstanding arrears to the Council will be deducted from the grant awarded.
- Leave full, vacant possession of their property,
- Not render any member of the household homeless.

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<sup>1</sup> Grants will not be awarded to tenants who hold an introductory tenancy extended past 12 months.

	<p>Tenants will be advised and supported through the process of moving both by the Council and relevant agencies. The Council will apply priority criteria to administer the scheme where demand exceeds grant availability, as outlined below.</p> <p>The objectives outlined in the grants to move scheme support those outlined in the over-arching Housing Strategy (2013-2018), which emphasises the proactive use of Council's resources to make the best use of the its housing stock, and which were approved by Harrow Council's Cabinet in April 2013.</p>
<p><b>2. What factors / forces could prevent you from achieving these aims, objectives and outcomes?</b></p>	<p>Factors that may prevent the grants to move scheme from achieving its aims include a lack of demand from Harrow Council tenants to move under the scheme. This may be related to a failure to promote the benefits of such moves to tenants, or negative publicity in the local or national press. Conversely, demand for the scheme may outstretch the number of moves that could be delivered with the funding allocated to it. This may be particularly pertinent if further changes are made to welfare benefits, which could increase the need for social mobility. High demand also increases the risk of legal challenge.</p> <p>The ability of the grants to move scheme to achieve its objectives may also be limited by a lack of resources or robust procedures to deliver the scheme effectively. Harrow Council will seek external funding from the Greater London Authority to deliver the home ownership element of the scheme, and the number of moves that could be delivered (and thus the extent to which the objectives are delivered) would be diminished if this funding was not secured.</p> <p>The changing economic environment may also affect the ability of the scheme to achieve its objectives. Changes to welfare benefits may increase housing need in the borough, and limit the impact of the scheme. Wider changes in the economy, for example in relation to employment and earnings, may reduce the number of tenants who could feasibly consider a move under the proposed scheme.</p>
<p><b>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.</b></p>	<p>Customers include:</p> <ul style="list-style-type: none"> <li>• Harrow Council tenants</li> <li>• Households in housing need on the Council's housing register</li> </ul> <p>Stakeholders include registered providers (Housing Associations), private sector landlords, contractors of the Council (housing and social care), other council departments (children's &amp; families, adult social care)</p>
<p><b>4. Is the responsibility shared with</b></p>	<p>Housing Services has overall responsibility for delivering and monitoring the Scheme, but will work with</p>

<p>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>other Council departments as appropriate to do this.</p> <p>Councillors are responsible for deciding whether the changes that have been proposed will be implemented.</p>
<p><b>4a.</b> How are/will they be involved in this assessment?</p>	<p>Representatives have been involved in the development of the scheme and in this equality impact assessment. Consultation on the proposals has also taken place with customers, as described under question 7.</p>

**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)

<p>Age (including carers of young/older people)</p>	<p><b>Census data:</b> In the period 2001-2011, Harrow’s population has grown by more than 15% to 239,000. The 0-14 age group is estimated to have increased by 15.7% due to a significant number of births within the Borough within the last 10 years, and those aged 65+ are estimated to have increased by 12.3% within the same period. Household size within the borough is the second highest in the country at 2.8 people per household (Office for National Statistics, 2001 and 2011).</p> <p><b>Analysis of demand from Council tenants to move (via Locata):</b> Age is held for 521 (100.0%) of transfer tenants. Of these, 261 (50.0%) are aged over 45, which compares to 37.8% across the borough. This supports anecdotal evidence that a significant number of tenants looking to transfer are older households seeking to downsize. This needs to be adjusted for the fact that Census data will include children, who cannot register for accommodation. (Data as at 16/04/2013).</p> <p><b>Analysis of demand from homeless applicants (via Locata):</b> Age is held for 259 (97.0%) homeless applicants. Of these, 98 (37.8%) are aged over 45, which reflects exactly the age profile of residents in the borough.</p>
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Disability (including carers of disabled people)	<p><b>Census data and housing stock condition survey:</b> 14.6% of residents in Harrow report a limiting long-term illness or disability which limits their day-to-day activities. This is below the national average of 17.9%, but represents an increase of 13.2% since 2001 (Office for National Statistics, 2001 and 2011). The 2001 housing stock condition survey (updated in 2008) highlighted that 78% of private sector housing stock within the borough was pre-1949, and with older housing comes particular issues of condition and its impact on the health and safety of those living within it, especially vulnerable households.</p> <p><b>Analysis of demand from Council tenants to move (via Locata):</b> 101 tenants registered for transfer have provided disability-related data, with 48.5% declaring a disability. This reflects the vulnerabilities experienced by many in social housing, and indicates the need for a package that offers various forms of support to those using the scheme.</p>
Gender Reassignment	Data on this protected characteristic was collected during the consultation exercise. No respondent declared that they have undertaken gender reassignment. Equalities data will continue to be collected following the launch of the proposed scheme.
Marriage / Civil Partnership	<p><b>Census data:</b> Harrow has a very high percentage of married couples, with 53.7% of residents aged 16 and older declaring they were in a marriage in 2011. This is above the national level of 46.6%. There was a 27% increase in the number of married people living in Harrow between 2001 and 2011 (Office for National Statistics, 2001 and 2011). Between their inception and January 2012, 107 civil partnership ceremonies have taken place in Harrow.</p>
Pregnancy and Maternity	Data on this protected characteristic was collected during the consultation exercise, as outlined below. There was no evidence that this protected group responded differently to any of the consultation questions.
Race	<p><b>Census data:</b> 2011 Census data shows that 69.1% of Harrow's residents are minority ethnic, where minority ethnic is defined as all people who are non-White British. Nationally, Harrow now has the fourth lowest proportion of White British residents, compared to a ranking of 8th in 2001. The White British population group has fallen by 28.5% since 2001, suggesting that Harrow is becoming increasingly diverse (Office for National Statistics, 2011).</p> <p><b>Analysis of demand from Council tenants to move (via Locata):</b> Ethnicity data is held for 467 (89.5%) of transfer tenants. Of these, 304 (65.1 %) are Black or of a minority ethnic background. This is broadly in line with the Census data and indicates the importance of effective communication with different ethnic</p>

	<p>groups. (Data as at 16/04/2013).</p> <p><b>Analysis of demand from homeless applicants (via Locata):</b> Ethnicity data is held for 229 (85.8%) homeless applicants. Of these, 205 (89.5%) are Black or of a minority ethnic background. This suggests that there will be an over-representation of BME customers that move into the properties released as a result of the grant scheme.</p>
Religion and Belief	<p><b>Census data:</b> The 2011 Census revealed that religious affiliation is very high in Harrow; at 9.6%, the borough has the 2<sup>nd</sup> lowest number of residents who stated that they have no religion. This compares to 24.7% nationally (Office for National Statistics, 2011).</p> <p><b>Analysis of demand from Council tenants to move (via Locata):</b> Data on faith is held for 140 (26.8%) of transfer tenants. 115 (75.2%) have declared a religious belief, compared to 84.4% for the borough of Harrow. (Data as at 16/04/2013).</p>
Sex / Gender	<p><b>Census data:</b> In 2011, 49.4% of Harrow residents were male and 50.6% are female. This is very similar to the national profile, but the number of males in Harrow has slightly increased since 2001 (Office for National Statistics, 2001 and 2011).</p> <p><b>Analysis of demand from Council tenants to move (via Locata):</b> Data on gender is held for 521 (100.0%) of transfer tenants. The majority (384, or 73.4%) are female. This is higher than would otherwise be expected, but does not represent the composition of the remainder of the tenant's household. (Data as at 16/04/2013).</p> <p><b>Analysis of demand from homeless applicants (via Locata):</b> Data on gender is held for 267 (100.0%) of homeless applicants. The majority (159 or 59.6%) are female, although once again this does not represent the composition of the remainder of the tenant's household.</p>
Sexual Orientation	<p><b>Analysis of demand from Council tenants to move (via Locata):</b> 132 (25.3%) transferring tenants have provided sexual orientation data. Of these, 125 (94.6%) respondents have said that they are heterosexual. (Data as at 16/04/2013).</p>
6. Is there any other (local, regional, national research, reports, media) data sources that can inform this assessment?	<p>Under the current Allocations Scheme, approximately 40% of allocations to Harrow Council properties are made to homeless households in temporary accommodation. This will be monitored as it is liable to change under the new</p>

Include this data (facts, figures, evidence, key findings) in this section.	Allocations Scheme to be introduced in 2013.			
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	✓	No	
<p><b>NOTE:</b> 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 <b>unable</b> 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 <b>completed before</b> progressing with the rest of the EqIA.</p>				

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>
Harrow staff, tenants, residents and private rented sector and representative and third-sector agencies	<p>August – October 2011, January – March 2013</p> <p>A series of road-shows throughout the borough. Community meetings. Consultation sessions including at key meetings, e.g. TLRCF, HFTRA, Harrow Weald TRA and the Affordable Housing Delivery Group. Council website hosted a Housing Changes questionnaire.</p>	<p>“Housing Changes” Consultation took place as part of the development of a suite of housing strategies out as part of the recent Housing Changes review supported the introduction of measures to make the best use of the Council’s housing stock and minimise homelessness. The Consultation also revealed support for housing in the private rented sector.</p> <p>When asked if they thought they would have to move in the future, many people stated that they would like to move into shared ownership housing once they have a sufficient deposit saved. The age groups who supported home ownership most strongly were the 35-44 and 55+ groups.</p>	

<p>Tenants, leaseholders and residents at Tenants, Leaseholders and Residents' Consultative Forum (TLRCF) meeting</p>	<p>Discussion paper outlining a number of proposals was taken to the group and a discussion held with members.</p>	<p>TLRCF members supported the proposal objectives. There was limited support for a small number of options taken to the group,</p>	<p>Proposals were refined following the forum meeting.</p>
<p>Awareness-raising with staff and tenants</p>	<p>Presentation at a staff housing ambition plan conference on 27/03/2013. Limited advertising of the scheme in 'Homing In', the Council's newsletter for tenants and leaseholders.</p>	<p>The consultation exercise and the limited marketing have generated significant interest, and 13 tenants have already registered their interest in the grant.</p>	<p>Harrow plans to pilot the grant with an interested tenant to ensure processes are robust prior to the formal launch of the scheme.</p>
<p>Social housing tenants in the borough who have registered to downsize to another social housing home</p>	<p>04/03/2013 – 16/05/2013 Telephone contact – respondents were asked a series of questions from a formal questionnaire.</p>	<p>The survey demonstrated that tenants' reasons for wanting to downsize are very different, and are largely related to age. Older people tend to want to downsize to better-manage their property or to avoid higher bills, whilst younger people are more likely to be overcrowded and would prefer to move to avoid the impact of the bedroom tax. The consultation outlined that a number of tenants have been awaiting a transfer or a suitable mutual exchange for a number of years.</p> <p>The tenants who were the most dissatisfied with the current downsizing scheme were older, and generally over 45. This was closely associated with tenants requesting additional support; all of those requesting support to decorate their new property were over 45. Some older tenants have refused properties because they are not confident in carrying out the works they deemed necessary. The consensus from younger tenants was that</p>	<p>Communication should appeal to those with differing housing needs and should outline the range of housing options available to tenants.</p> <p>A package of housing options advice and support will be offered to all tenants moving through this scheme. Following the consultation, an allowance for decoration in the new property is included in the scheme proposals.</p>



		<p>decoration in the new property would make the move easier and more desirable, but was not essential.</p> <p>Some respondents did not have access to IT. Some tenants were concerned that this would affect their ability to register to downsize and find appropriate accommodation.</p>	<p>Harrow currently employs a member of staff to assist tenants with registering online and identifying properties. This will be continued for downsizing moves under the Grants to Move scheme</p>
<p>Social housing tenants in the borough who attended an event to promote mutual exchange</p>	<p>23/03/2013 Semi-structured interviews with tenants using a questionnaire</p>	<p>The consultation confirmed that tenants' choice of property is closely associated with the age. Older people in particular were more likely to specifically request bungalow accommodation, and these tenants were having difficulties finding this type of accommodation, even outside of the borough.</p> <p>53% of respondents indicated that they would consider moving out of Harrow. There was an over-representation of both younger and BME groups in those tenants indicating that they would consider moving out of Harrow. In a number of cases, this was to avoid the impact of the forthcoming benefit cap, which has the potential of making renting in London less affordable for larger households.</p> <p>This consultation revealed trends in the type of grant that tenants would consider accessing. 50% of those wanting to move into the private rented sector were younger than 45 years and married, and 38% had been pregnant within the last 2 years. Those who would consider moving into</p>	<p>The proposed scheme would provide more options for tenants wanting specific types of accommodation.</p> <p>The Council will only award the grant where the property is expected to meet the needs of the tenant and their household in the foreseeable future.</p> <p>The consultation reveals that there may be an over-representation of certain protected characteristics in moves generated by the proposed scheme. Harrow will monitor equality information of those accessing the</p>

		home ownership were also more likely to be younger, with 78% under 45, and 67% were BME.	scheme and make amendments as necessary to ensure the scheme remains accessible to all groups.
Voluntary Sector organisations	13/05/2013 – 21/05/2013  Proposals were circulated to representatives, who were invited to respond to a number of formal questions via email or telephone	Consultation response was limited, but feedback supported the proposals and highlighted that the grants offered should be sufficient to encourage and enable tenants to move. Feedback recommended that the Council support tenants through the move by offering clear advice on the range of options available and ensuring that expectations are well-managed. An agency proposed that the scheme could be prioritised according to the property type that would be released.	Effective housing options advice and support will be offered to all tenants moving through this scheme.  The consultation supports the Council's proposals to prioritise applications on property size, where demand exceeds grant availability.

### 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)	✓		Tenants may benefit from the grants to move scheme for different reasons. For example, under the scheme to downsize to other social housing accommodation, older tenants may want to downsize in order to move into a more manageable property whilst younger tenants may want to downsize to avoid the impact of the bedroom tax. It is important that the scheme appeals to these different needs and does not inadvertently exclude any groups.  Historically, older tenants may have been more	The proposed scheme will offer appropriate and holistic housing options advice and support to tenant to enable tenants to make an informed choice about how to best meet their housing needs.  Consultation with different age groups is important to ensuring that the scheme meets the needs of customers. Must also ensure that final communication strategy recognises these needs.

		<p>likely to use the downsizing scheme but the introduction of the housing benefit bedroom tax may increase the number of middle-aged tenants utilising the scheme. The homeless applicant age profile outlined in Stage 2 of this assessment demonstrates that this will be balanced by those customers who can access the properties released through the grant scheme, who tend to be younger.</p> <p>Poor housing conditions in the private sector can have a detrimental impact on vulnerable tenants. This might be more of an issue for the health and wellbeing of older people and children.</p> <p>The increased mobility generated in the Council's housing stock as a result of this scheme may allow over-crowded tenants to transfer to more suitable accommodation. This is more likely to benefit younger tenant groups.</p> <p>Economic circumstances and changes to welfare benefits may mean that certain age-groups are less able to take advantage of the proposed scheme. The changes may adversely affect specific groups such as single households under 35 years or out-of-work, working-age households on benefits, but these are government policies and Harrow Council has very little control over them. Lenders generally refrain from approving mortgages to elderly buyers, and again this is outside the Council's control.</p> <p>Of those tenants who indicated that they may have difficulties vacating their tenancy in the time allowed</p>	<p>Develop robust procedures for staff to ensure that a grant is only awarded where a tenant is to move to suitable (permanent) accommodation that meets the needs of the applicant (and the household) into the foreseeable future.</p> <p>Collect and review equality data to ensure that the Council can robustly monitor the proposed service and ensure that the service is accessible.</p> <p>The Council will continue to ensure that tenants are informed of all of their housing options when attempting to access the scheme. Feedback from tenants moving through the scheme will be collected and reviewed to ensure the scheme is effective, and to build an advice bank for tenants considering accessing the scheme .</p> <p>Improve communication between Council departments to ensure tenants are given longer</p>
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			under current arrangements, all were over 45, and 50% were over 65.	notice when a potential property becomes available.
Disability (including carers of disabled people)	✓		<p>Locata data shows that a large proportion of tenants wishing to move have declared a disability. Harrow will need to ensure that the proposed scheme appropriately recognises and meets needs from this group.</p> <p>Those with a physical or learning disability may possibly be impacted upon more severely by poor housing conditions in the private sector than some other groups.</p> <p>Moves into the private sector through this scheme may allow disabled tenants to find accommodation more appropriate to their needs (e.g. where specific fixtures/fittings can be installed or where the property is large enough to allow for a live-in carer). Alternatively, the incentive that is paid could be used to pay for adaptations. The scheme will be flexible to allow tenants to move in with a family member to receive care and support. Alternatively, the increased mobility generated in the Council's housing stock as a result of this scheme may allow disabled households to transfer to more suitable accommodation.</p> <p>Tenants may apply for the scheme in a number of</p>	<p>A package of quality housing options advice and support will be offered to all tenants moving through this scheme.</p> <p>Develop robust procedures for staff to ensure that grants are only to be awarded where the move is to suitable (permanent) accommodation that meets the needs of the applicant (and the household) into the foreseeable future. The procedures should clearly outline how this should be assessed, e.g. by:</p> <ul style="list-style-type: none"> <li>• establishing a constructive dialogue with the tenant and their household;</li> <li>• identifying specific disabilities and vulnerabilities in the household, through dialogue with the household, evaluating to what extent these would be improved (or made worse) by the move;</li> <li>• ensuring the tenant is fully informed of all available housing options available to them.</li> </ul> <p>Whilst it is recognised that officers will need to use an element of discretion to ensure that moves will meet the needs of tenants and members of their household, the process by which this is carried out will be outlined in procedures to ensure consistency and to minimise the risk of a differential impact on a protected group.</p> <p>The proposed scheme will make reasonable</p>

			ways, including by telephone. Those applying through the scheme will not be expected to visit the office, unless they apply for a home-ownership grant when this might be necessary. Adjustments will be made as appropriate to ensure the service is accessible on an individual basis.	adjustments to ensure the service can be delivered to vulnerable tenants. This will include home visits.
Gender Reassignment			There is limited data with regard to this group. We have no reason to suppose that proposed scheme will have an impact either positively or negatively on this group.	Currently we have no evidence that the objectives of this scheme will have a negative impact. Harrow Council will continue to monitor this.
Marriage and Civil Partnership	✓		The proposed scheme recognises the relationships between applicants. Whilst the incentive will be paid to the Council tenant, it can be used to fund a move that will benefit all members of the household. The scheme will also accept applications from multiple tenanted properties (providing full and vacant possession is given) where tenants in a relationship want to move in together	
Pregnancy and Maternity	✓		<p>Pregnant mothers or mothers with young children may be disadvantaged due to poor conditions or security in the private sector.</p> <p>The grant scheme may enable mothers and families in over-crowded conditions to move out into properties in the private sector that are better-suited to their needs. Alternatively, the increased mobility generated in the Council's housing stock as a result of this scheme may allow priority families to transfer to more suitable accommodation.</p>	As above, develop robust procedures for staff to ensure that a grant is only awarded where the move is to suitable (permanent) accommodation that meets the needs of the applicant (and the household) into the foreseeable future.

Race	✓		<p>Some BME groups may be more likely to have larger households, and therefore require a larger property. The proposed scheme will benefit these households by offering them more choices in order that they can meet their housing need.</p> <p>The proposals will prioritise larger households in order to best help the Council meet housing demand in the borough. Analysis of homelessness data also demonstrates that those people housed in the properties released through the scheme will mainly be BME.</p> <p>Harrow has a diverse population, and this poses a barrier in terms of communicating the scheme and its benefits.</p>	<p>The proposed scheme will offer appropriate and holistic housing options advice and support to tenant to enable tenants to make an informed choice about how to best meet their housing needs</p> <p>As discussed below (see 'Other'), the Council will monitor the impact of the priority criteria to ensure an acceptable balance between meeting housing need and ensuring the scheme benefits all protected characteristics equally.</p> <p>It is vital that the scheme has a clear communication strategy that coherently publicises the benefits of the scheme and targets communication where appropriate.</p>
Religion or Belief	✓		<p>Tenants with certain cultural beliefs may find a limited number of suitable properties owned by Harrow Council. In particular, households may require larger homes, of which there is a shortage in Harrow, which means the options for the council and family of finding suitable accommodation in Harrow is limited. The proposed scheme allows tenants to access a wider choice of properties that might be more suited to their needs.</p> <p>Some followers of Islam will not take any interest-based mortgage. This may restrict their access to the home-ownership scheme.</p>	<p>Communication will make use of a range of media to promote the scheme, including through appropriate community groups.</p> <p>Staff and procedures to point Islamic tenants to appropriate mortgage offers, such as those offered by Al Buraq Home Finance.</p>

Sex	✓		<p>The proposals are expected to have a positive impact on both genders but may have a more pronounced impact on women because they tend to head more single parent families (women account for 92% of lone parent families in Harrow (Census, 2011). Women also tend to live longer than men and there is a slight over-representation of women in the borough (as outlined in Stage 2).</p> <p>However, it is likely that the over-representation of female lone-parent families may be associated with lower household earnings. This may lead to women having more difficulties accessing the mortgage market than men.</p>	<p>Collect and review equality data to ensure that the Council can robustly monitor the proposed service and ensure that the service is accessible.</p> <p>Harrow is not in a position to control access to the mortgage market. Feedback from tenants moving through the scheme will be collected and reviewed to ensure the scheme is effective, and to build an advice bank for tenants. This may assist tenants to find appropriate mortgage products.</p>
Sexual Orientation			<p>There is limited data with regard to this group. We have no reason to suppose that proposed scheme will have an impact either positively or negatively on this group.</p>	<p>Currently we have no evidence that the objectives of this scheme will have a negative impact. Harrow Council will continue to monitor this.</p>

Other (please state)	✓	<p>There is evidence that housing need in the borough is increasing. The number of households in bed-and-breakfast accommodation has increased from a handful in December 2010 to over 70 households at the end of March 2013. Such accommodation is acknowledged to be unsuitable for long-term habitation. The scheme will encourage mobility in the stock and will help the Council reduce the number of households in such temporary accommodation,</p> <p>Changes to welfare benefits mean that working households will be in a better position to afford private accommodation than those which are not in work. The housing benefit size criteria, introduced in April 2013, are likely to increase demand for the downsizing grant. The welfare benefit changes put additional pressure on vulnerable protected groups to move.</p> <p>Renting or purchasing a home in London is less affordable than outside of London. This may therefore increase the number of members from the protected groups seeking to move outside of London.</p> <p>Data from the 2011 Census suggest that the number of people living in Harrow is increasing far more rapidly than the number of properties within the Borough, and that Harrow has the second largest household size in England, at 2.9 per household. This may mean that a significant number of the Council's housing stock is overcrowded. The grants to move scheme, and the mobility within the stock that it will generate, will help to address this problem.</p>	<p>Harrow Council will continue to work with unemployed households to help them get back into work, where this is appropriate.</p> <p>A package of housing options advice and support will be offered to all tenants moving through this scheme. The nature of the support offered will vary depending on the type of move, but the Council will secure additional staff resources to ensure this can be effectively delivered. Harrow will also investigate the feasibility of offering independent advice to tenants. The Council will only award the grant where the property is expected to meet the needs of the tenant and their household in the foreseeable future.</p>
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			<p>The scheme may attract negative publicity, and tenants using the scheme may be stereotyped negatively if it is assumed that all applicants are avoiding the impacts of the welfare benefit changes by moving.</p> <p>Whilst the proposed scheme will be accessible to all tenants, it will prioritize larger tenant households where demand exceeds grant availability (this is likely to relate to the home-ownership grant in the first instance). This is likely to be to the benefit of particular protected characteristics, including younger tenants, mothers and BME tenants, who are all more likely to have larger families. This will be partly balanced by the mobility in the stock created as a result of the move, which will potentially have a knock-on effect for a number of households registered for social housing accommodation.</p> <p>Extending the grant to the private rented sector will offer more choice to tenants in how they meet their individual housing needs. However, those tenants who chose to move into the private rented sector may be at more risk of becoming homeless at a later date. The increased mobility generated in the Council's housing stock as a result of this scheme may also allow households not able to move into the private sector to transfer to more suitable accommodation.</p>	<p>Ensure communication highlights the variety of personal circumstances of tenants utilising the scheme, and the contribution of the scheme to making the best use of housing stock.</p> <p>The Council has taken the decision to prioritise specific types of households in order to best meet housing need in the borough, although it is recognised that this may give a slight advantage to specific tenant households. At this stage, the Council does not believe it would be proportionate response to amend the scheme criteria. However, equalities data for the proposed scheme will be collected and monitored to better evaluate the impact of the priority criteria, and will be reviewed within the first 12 months of the scheme's implementation.</p> <p>Harrow would wish to ensure that only those tenants who can afford and manage a private rented tenancy are encouraged to move. This will minimise the risk of homelessness, and the Council will develop robust and transparent criteria in line with those recently adopted in the Housing Changes Strategies to do this.</p>
<p><b>9. Cumulative impact</b> – 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.</p> <p><b>Example:</b></p>			<p>The development of the grants to move scheme stems from a key objective of Harrow Council's overarching Housing Strategy (2013-18) to make best use of stock. It has taken into consideration the wider changes taking place in the housing policy landscape, which mean that Harrow is increasingly unaffordable for non-working households. There is a shortage</p>	

<p>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>of social housing and its supply is much lower than the demand placed on it. This results in households being placed in temporary accommodation, with its associated costs to the council's budget, for a significant period of time.</p> <p>Within these contexts, the grants to move scheme will assist tenants to realise their housing ambitions whilst helping to address the increasing demand for social housing in the borough, and the costs that this presents for the Council. It will work in conjunction with other schemes to facilitate moves, such as those offered by Locata, Homeswapper, and the Greater London Authority.</p> <p>The Grants to Move scheme will also contribute to meeting other Council objectives. This includes assisting tenants to mitigate against the effects of changes to welfare benefits and offering an alternative to tenants exercising their right to buy, thereby maintaining the Council's HRA income stream and asset base.</p>
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**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.

(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>
The proposals recognise the need to inform minority groups of the scheme, and the potential benefits of	The scheme will promote improved housing conditions for residents across the borough. It will also	The scheme will promote improved housing across the borough. It will also promote better mobility in the	As above, and clearly communicating initiatives and services that are available to

<p>this for them. Support will be given on an assessed and individual basis.</p>	<p>allow households to achieve their housing ambitions. This will improve and promote equality of opportunity across the protected characteristics.</p>	<p>Council's housing stock and give tenants more of a choice about where they want to live. This in turn will lead to fostering better relations between different groups.</p> <p>Reducing costs associated with expensive use of emergency accommodation should contribute to the Council achieving greater use of its resources and in turn support the delivery of new initiatives.</p>	<p>residents</p>
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**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 EqlA ( ✓ tick one box only)

**Outcome 1** – No change required: when the EqlA 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 EqlA. *List the actions you propose to take to address this in the Improvement Action Plan at Stage 5*

**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 EqlA 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 EqlA 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 EqlA.

Area of potential adverse impact e.g. Race, Disability	Action proposed	Desired Outcome	Target Date	Lead Officer	Progress
All	Consultation with customers across protected characteristics and representatives of voluntary agencies	Scheme meets the needs and expectations of different age groups	May 2013	Scott Bryant	Complete

All	Develop an effective communication strategy that reflects how the scheme can meet many different needs and targets communication where appropriate	Ensure the scheme is advertised effectively to maximise the benefit of the scheme to customers.	July 2013	Communications, Jane Fernley	
All	Collect feedback from tenants moving under the scheme	To maximise the effectiveness and accessibility of the scheme	Review February 2014	Scott Bryant	
All	Ensure equalities data is collected as part of the grant application process and review services as appropriate	Robust monitoring system implemented and service is equally accessible to all groups.	Ongoing	Scott Bryant	
Age, disability, pregnancy & maternity, other	Develop robust guidance on eligibility for tenants applying for grant	Grants to be awarded where they are to suitable (permanent) settled accommodation that meets the needs of the applicant (and the household) into the foreseeable future.	August 2013 (prior to launch)	Scott Bryant	
All	Develop procedures that allow for better communication between	More effective and efficient service and longer notice period	August 2013 (prior to launch)	Scott Bryant	

	Council departments	for tenants seeking to downsize.			
All	Implement an appropriate package of advice and support for all tenants moving through the proposed scheme.	All tenants understand the implications of the move and are supported through the process and other potential housing options.	August 2013 (prior to launch)	Scott Bryant	
Age, race, pregnancy and maternity, other	Use equality data to review the impact of the priority criteria on access to the grant scheme	Ensure an appropriate balance between meeting housing need and equality of access to the scheme	August 2014 (or within 12 months of implementation)	Scott Bryant	
All	Investigate the feasibility of offering independent advice through the CAB to tenants considering using the scheme	Ensure that tenants make an informed choice about leaving their tenancy.	August 2013	Scott Bryant	

### 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? *(Also Include in Improvement Action Plan at Stage 5)*

The formation of the grants to move Scheme has been overseen by the Housing Senior Management team and the Under-Occupation/Grants-to-Move steering group. Once the scheme has been adopted, this group's role will be to monitor its delivery against objectives. Provision has been made for the scheme to be reviewed within the first 6 months

	of its implementation, and thereafter annually as part of the HRA business plan review.			
<b>15.</b> Do you currently monitor this function / service? Do you know who your service users are?	Yes	✓	No	
<b>16.</b> 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>	As outlined in the Action Plan.			
<b>17.</b> How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 5)</i>	Findings of reviews will be made available prior to the relevant review meetings. It is proposed that as a minimum reporting is done in line with the council's performance management framework and other local requirements			
<b>18.</b> Have you received any complaints or compliments about the policy, service, function, project or proposals being assessed? If so, provide details.	We have not received any complaints on the options. Formal consultation has been carried out on the scheme, as described above. Feedback from tenants about the proposed scheme following consultation and limited advertising has so far been positive.			

## 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

**NOTE:** 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?

This equality impact assessment has been completed alongside the development of the grants to move scheme. Various potential negative impacts have been identified as part of this, and the scheme has been amended throughout its development in order to remove or minimise the risk of these impacts. The accessibility of the private sector to certain groups may be restricted by the practices of mortgage lenders and private sector landlords, and this may particularly affect those on lower incomes, the elderly and unemployed. The Council is also proposing priority criteria to help the Council meet housing need, which will be of greater benefit to larger households. However, the scheme presents numerous opportunities for significant positive impacts for tenants and those in housing need, and all opportunities have been taken to advance equality.

The impact assessment does not suggest that any further adjustments need to be made to the proposed grants-to-move scheme, although, as outlined in the accompanying action plan, this will be kept under review.

20. How will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc

Council website, intranet, sent to various partnership meetings

## Stage 8 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)

The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.

21. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Plan?

Under-Occupation / Grants-to-Move steering group  
Community Health and Wellbeing Equalities Task Group

Signed: (Lead officer completing EqIA)

Scott Bryant

Signed: (Chair of DETG)

Date:

28/05/2013

Date: