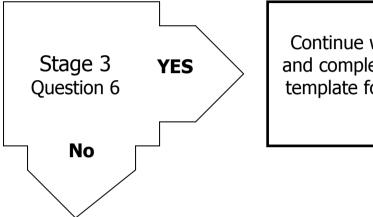
# **Equality Impact Assessment Template**

The Council has revised and simplified its Equality Impact Assessment process. There is now just one Template. Project Managers will need to complete **Stages 1-3** to determine whether a full EqIA is required and the need to complete the whole template.

Complete Stages 1-3 for all project proposals, new policy, policy review, service review, deletion of service, restructure etc



Continue with Stage 4 and complete the whole template for a full EqIA

Go to Stage 6 and complete the rest of the template

# Equality Impact Assessment (EqIA) Template

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 assessment.

It will also help you to look at the EqIA Template with Guidance Notes to assist you in completing the EqIA.

Type of Project / Proposal:	Tick	Type of Deci	sion:	Tick	
Transformation		Cabinet			
Capital		Portfolio Holde	er		
Service Plan		Corporate Stra	ategic Board		
Other		Other			
Title of Project:	Review of	the Help Schem	ne		
Directorate / Service responsible:	Collections	s and Housing B	enefits, Resources Directorate		
Name and job title of lead officer:	Fern Silve	rio, Head of Ser	vice, Collections and Housing Ber	nefits	
Name & contact details of the other persons involved in the assessment:	Bernie Beckett, Consultation Project Manager				
Date of assessment:	31 <sup>st</sup> October, 2013 – Version 1				
Stage 1: Overview					
<ol> <li>What are you trying to do?</li> <li>(Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</li> </ol>	scheme has been taken forward. This EqIA provides detail on the impacts of the proposed policy changes to the scheme for the year 2014/15.				
	The Pilot	Help Scheme wa	as agreed at Cabinet on the 14 <sup>th</sup>	March, 2013 and	

implemented on the 1st April, 2013.

The intentions of the pilot scheme are to:

- Provide a holistic approach to the provision of advice and support to people affected by welfare reforms;
- Make best use of all available resources across Harrow, including advice and support agencies
- Develop a Directory of Support to enable effective signposting
- Bring together discretionary pots of funding within the Council, as appropriate to ensure resources are used to their maximum effect.

The Help Scheme includes the following features:

- The Directory of Support is now being taken forward in partnership with a
  voluntary sector consortium, Harrow Advising Together (HAT), who has
  received lottery funding, to develop an Advice Portal. This portal will support
  the effective signposting for residents in Harrow and will link into the Harrow
  Help pages on the Council's website.
- The discretionary pots of funding that sit within the Harrow Help Scheme include:

The Financial Hardship fund – The draft policy and Equality Impact Assessment will be put to the February 2014 Cabinet for decision.

The Discretionary Housing Payment (DHP) – this is Government funding to support people receiving Housing Benefit, who are impacted by the welfare reforms, with their housing costs. The policy was agreed at Cabinet in July 2013 and is not under review.

Xcite funding for support with transport and construction which is not under review.

Emergency Relief Scheme – the review of the Help Scheme will focus on reviewing

the operation of the Emergency Relief Scheme.

The review of the Help Scheme has been carried out by consulting with referral partners which has included the Citizens Advice Bureau and Jobcentre Plus, staff delivering the scheme and users of the scheme, both successful and unsuccessful. An overview of the feedback is attached at Appendix C to the Cabinet Report.

**Emergency Relief Scheme** 

The Emergency Relief Scheme was agreed at Cabinet in March 2013 and implemented, as a pilot scheme, in April 2013. The scheme sits within the overall umbrella of the Help Scheme.

The Government have provided funding for two years to deliver Local Welfare Provision and therefore Officers have recommended to Cabinet that the Emergency Relief Scheme continue for the second year of operation from April 2014 to March 2015.

The review of the Emergency Relief Scheme has covered the following:

- The process
- Criteria and application of the criteria
- Support provided

The feedback from the review has shaped the changes to the scheme which are in relation to the primary criteria to access the scheme and the secondary criteria and provision of support. All of the changes to these criteria result in additional support provided to the customer for the operation of the second year of the scheme 2014/15. The changes to the policy are explained in detail within the Cabinet Report at page 11.

#### **Help Scheme Policy**

The Help Scheme policy has been updated to reflect the proposed changes and is at Appendix A to the Cabinet report.

	Residents / Service Users		Partners		Stakeholders		
	Staff		Age		Disability		
<b>2.</b> Who are the main people / Protected Characteristics that may be affected by your proposals? ( all that apply)	Gender Reassignment		Marriage and Civil Partnership		Pregnancy and Maternity		
	Race		Religion or Belief		Sex		
	Sexual Orientation		Other				
<ul> <li>3. Is the responsibility shared with another directorate, authority or organisation? If so:</li> <li>Who are the partners?</li> <li>Who has the overall responsibility?</li> <li>How have they been involved in the assessment?</li> </ul>	The overall responsibility for taking forward this assessment lies with the Collections and Benefits, Resources Directorate.  The policy has been developed by working in partnership with a multi-agency Community Reference Group and representatives from all service areas.						
Stage 2: Evidence / Data Collation  4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics.							
(Where you have gaps (data is not available/being collated), yellon at Stage 7)	you may need to include	this a	as an action to address ir	ı yo	ur Improvement A	ction	

(33,900) of Harrow's residents are 65 years of age and older.

**Harrow profile**: 20 per cent of Harrow's residents are aged under 16 (48,200)<sup>1</sup> whilst this signifies a small percentage change from 2010 estimates (0.7% change), in actual numbers it is an increase of 3,600 young

The average (median) age in Harrow is approximately 36 years, which ranks Harrow 284th out

65.9 per cent (158,400) of Harrow's population fall within the working age bracket (16 to 64) and 14.1 per cent

Age (including carers of young/older

people)

people.

<sup>&</sup>lt;sup>1</sup> Source: mid-year population estimates 2011

	of 240 local or unitary outhorities for any denisting a vounger average than the majority of local outhorities 2
	of 348 local or unitary authorities for age, depicting a younger average than the majority of local authorities <sup>2</sup> .
	A paper showing a detailed breakdown of access to the scheme of groups from the protected characteristics is attached to this EqIA at Appendix B.
	The breakdown shows that the majority of people accessing the scheme are of working age with the minority of pensionable age.
	The Scheme has been developed to support people who are in financial hardship. The changes to the scheme, as a result of the review, provide additional help to people in emergency need for the second year of operation of the scheme 2014/15.
	<b>Harrow profile</b> : 17.3% of Harrow's working age population (16-64) classified themselves as disabled within the 2011-12 period (July to June), a total of 26,600 individuals. This signifies a decrease of 4.6% for the same period in 2010-11. 13,800 (17.3%) are men and 12,900 (17.7%) are women <sup>3</sup>
	A paper showing a detailed breakdown of access to the scheme of groups from the protected characteristics is attached to this EqIA at Appendix B.
Disability (including carers of disabled people)	The breakdown shows there is a slightly higher percentage of people with disabilities accessing the scheme than the number of people with disabilities of working age across Harrow within the Harrow profile however some of these applicants who have stated they have a disability to not receive a disability payment.
	The Scheme has been developed to support people who are in financial hardship. The changes to the scheme, as a result of the review, provide additional help to people in emergency need for the second year of operation of the scheme 2014/15.
	Harrow profile: This data is currently not available
Gender Reassignment	A paper showing a detailed breakdown of access to the scheme of groups from the protected characteristics is attached to this EqIA at Appendix B.
	All applicants to the scheme that completed the equality monitoring have advised their gender is the same

Source: 2011 Census briefing note 3: September 2012; Sue Kaminska
 Source: Nomis: Annual Population Survey

	as at birth.					
	The Scheme has been developed to support people who are in financial hardship. The changes to the scheme, as a result of the review, provide additional help to people in emergency need for the second year of operation of the scheme 2014/15.					
	Harrow Profile: Since their inception there have been a total of 121 civil ceremonies in Harrow. There is no further data available on marriages.					
	A paper showing a detailed breakdown of access to the scheme of groups from the protected characteristics is attached to this EqIA at Appendix B.					
Marriage / Civil Partnership	The majority of applicants to the scheme are single and small minority of people that responded to the monitoring information are married/civil partnership.					
	The Scheme has been developed to support people who are in financial hardship. The changes to the scheme, as a result of the review, provide additional help to people in emergency need for the second year of operation of the scheme 2014/15.					
	Harrow Profile: This data is currently not available					
	A paper showing a detailed breakdown of access to the scheme of groups from the protected characteristics is attached to this EqIA at Appendix B.					
Pregnancy and Maternity	A small number of people who have accessed the scheme (7.3% for awarded applications and 5.8% for refused applications) have been pregnant or on maternity leave in the past 2 years.					
	The Scheme has been developed to support people who are in financial hardship. The changes to the scheme, as a result of the review, provide additional help to people in emergency need for the second year of operation of the scheme 2014/15.					
Race	Harrow profile: Harrow is one of the most diverse places in the country. At the time of 2001 Census 49.9% of Harrow residents were classified as White British. 2011 figures reveal that the White British category now					

	includes only 30.9% of Harrow's population, 69.1% of residents are therefore classified as belonging to a minority ethnic group <sup>4</sup> The most significant minority ethnic group, at 26.4% is Asian/Asian British: Indian, ranking Harrow as second in England and Wales for its Indian population. Another significant group is classified as Asian/Asian British: Other Asian, making up 11.3% of residents and ranking Harrow 1st within this classification; this group is largely comprised of Sri Lankan community. All Asian/Asian British groups have increased since 2001.
	White Other is another group which has grown, from 4.49% in 2001 to 8.2% in 2011. Within this group there are 3,868 residents who were born in Poland and 4,784 residents born in Romania, making it the largest Romanian community within England and Wales <sup>5</sup> . Harrow still has a high Irish born population, ranked 7th in 2011. Whilst Black/African/Caribbean/Black British is not particularly dominant we have the highest number of Kenyan born residents (this can be attributed to a number of migrants from Kenya who are of Asian descent).
	A paper showing a detailed breakdown of access to the scheme of groups from the protected characteristics is attached to this EqIA at Appendix B.
	The breakdown shows that there are a high percentage of black/African/Caribbean/Black British people accessing the scheme than other ethnic groups.
	The Scheme has been developed to support people who are in financial hardship. The changes to the scheme, as a result of the review, provide additional help to people in emergency need for the second year of operation of the scheme 2014/15.
Religion and Belief	<b>Harrow profile:</b> The 2001 Census showed that Harrow had the highest level of religious diversity of any local authority in England and Wales. The 2011 Census ranked harrow 1 <sup>st</sup> for persons of Hindu religion, Jain and Unification Church. Out of 348 areas in England and Wales harrow has the 2 <sup>nd</sup> lowest ranking of residents with no religion and 5 <sup>th</sup> lowest for Christians (37.3%). Harrow is ranked 24 <sup>th</sup> for Muslim faith residents who account for 12.5% of the population. Information from the 2011 census shows the
	following:         - Christianity       Harrow - 37.3%       National - 59.4%         - Hinduism       Harrow - 25.3%       National - 1.5%         - Islam       Harrow - 12.5%       National - 5.0%         - Judaism       Harrow - 4.4%       National - 0.5%

<sup>&</sup>lt;sup>4</sup> 2011 Census: Ethnic Group. KS201EW <sup>5</sup> 2011 Census: Country of Birth (detailed). Table QS203EW

	– No religion Harrow – 9.6% National - 24.7%								
	- Religion not stated Harrow – 15.4% National – 7.2%								
	A paper showing a detailed breakdown of access to the scheme of groups from the protected characteristics is attached to this EqIA at Appendix B. This comparison with the overall population statistics shows that a lower percentage of people from the Hindu religion are accessing the scheme.								
	The Scheme has been developed to support people who are in financial hardship. The changes to the scheme, as a result of the review, provide additional help to people in emergency need for the second year of operation of the scheme 2014/15.								
	Of Harrow's total population (240,500), 118,900 (49.4%) are male and 121,600 (50.6%) are female <sup>6</sup>								
	A paper showing a detailed breakdown of access to the scheme of groups from the protected characteristics is attached to this EqIA at Appendix B.								
Sex / Gender	The breakdown of access to the scheme shows that more women are accessing the scheme than men.								
	The Scheme has been developed to support people who are in financial hardship. The changes to the scheme, as a result of the review, provide additional help to people in emergency need for the second year of operation of the scheme 2014/15.								
	Harrow profile: The 2011 census did not have a question on sexual orientation; however 306 persons declared living in a same sex couple, an increase of 84 couples. It is estimated that 6% of the UK population are lesbian, gay and bisexual (LGB), which would equate to approximately 14,430 of our residents belonging to the LGB community								
	Since their inception, a total 121 Civil Partnership ceremonies have taken place in Harrow.								
Sexual Orientation	A paper showing a detailed breakdown of access to the scheme of groups from the protected characteristics is attached to this EqIA at Appendix B. The breakdown of access to the scheme shows the majority of people accessing the scheme are heterosexual. There is no comparison available with Harrow's overall population statistics.								
	The Scheme has been developed to support people who are in financial hardship. The changes to the scheme, as a result of the review, provide additional help to people in emergency need for the second								

<sup>&</sup>lt;sup>6</sup> Source: 2011 Mid Year Estimates

	year of operation of the scheme 2014/15.
Socio Economic	Harrow profile: In comparison to other areas Harrow was relatively less deprived in 2010 than it was in 2007. It is now ranked 203rd out of 354 boroughs in England (where 1 is the most deprived) compared with x in 2007. In London, Harrow retains its position as 7th least deprived borough (out of 33). The indicator showing the most deprivation in Harrow is Barriers to Housing where it is ranked 54th most deprived nationally.
	The Scheme has been developed to support people who are in financial hardship. The changes to the scheme, as a result of the review, provide additional help to people in emergency need for the second year of operation of the scheme 2014/15.

**5.** What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?

List the Title of reports / documents and websites here.

The following information has helped to inform this EqIA:

- Publishing Equalities Information Meeting the Public Sector Duty January 2013 Harrow Council Our Harrow Our Story – 2013 -<a href="http://www.harrow.gov.uk/info/200041/equality">http://www.harrow.gov.uk/info/200041/equality</a> and diversity/863/public sector equality duty
- LGA, 'The Local Impacts of Welfare Reforms' August 2013
- Exemption criteria <a href="http://www.adviceguide.org.uk/england/benefits-e/benefits/the/benefit/cap/e/benefits/the/benefit/cap/and/housing/benefit/who/is/exempt.htm">http://www.adviceguide.org.uk/england/benefits-e/benefits/the/benefits/the/benefits/the/benefits/the/benefit/cap/and/housing/benefit/who/is/exempt.htm</a>

## Stage 3: Assessing Potential Disproportionate Impact

**6.** Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?

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

<b>YES -</b> If there is a risk of dispropor	tionate adverse Impact on any <b>ONE</b>	of the Protected Characteristics, co	ntinue with the rest of the template.						
<b>Best Practice:</b> You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA  It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.									
NO - If you have ticked 'No' to all o	of the above, then go to <b>Stage 6</b>								
	not have identified potential dispropo to make your proposals more inclus		tified actions which can be taken to Improvement Action Plan at Stage 7						
Stage 4: Collating Additional data / Evidence 7. What additional data / evidence have you considered to further assess the potential disproportionate impact of your proposals? (include this evidence, including any data, statistics, titles of documents and website links here)									
8. What consultation have you unde	ertaken on your proposals?								
What consultation methods were used?  What consultation methods were used?  What do the results show about the impact on different groups / Protected Characteristics?  What actions have you taken address the findings of the consultation?  (This may include further consultation with the affected groups, revise your proposals).									

# Stage 5: Assessing Impact and Analysis

**9.** What does your evidence 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	Adverse	Positive	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.  Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)
Age (including carers of young/older people)				
Disability (including carers of disabled people)				
Gender Reassignment				
Marriage and Civil Partnership				

Pregnancy and Maternity						
Race						
Religion or Belief						
Sex						
Sexual orientation						
10. Cumulativ	ve Impact -	- Considering	what else is happening within the	Yes	No	
	Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic?					
If yes, which Proposed in potential impact		racteristics co	ould be affected and what is the			
<b>10a. Any Other Impact</b> – Considering what else is happening within the				Yes	No	
Council and Harrow as a whole (for example national/local policy, austerity,			103	110		
welfare reform, unemployment levels, community tensions, levels of crime)						
			individuals/service users socio			
economic, near	ur or an imp	act on comm	unity cohesion?			
If yes, what is	the potential	impact and I	now likely is to happen?			

**11.** Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic 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) available on Harrow HUB/Equalities and Diversity/Policies and Legislation

	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 6: 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: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed. Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. List the actions you propose to take to address this in the Improvement Action Plan at Stage 7 Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance 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 you have ticked 'yes' in Q11, explain your justification with full reasoning to continue with your proposals.

## Stage 7: 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. How will you know **Date Action** Area of potential this is achieved? E.g. included in Action required to mitigate Lead Officer adverse impact e.g. **Target Date** Performance Measure Service / Race, Disability Team Plan / Target 31<sup>st</sup> March, Ensure all groups that Advertise the changes to the voluntary Discussions will be Fern Silverio/Jenny fall within the protected sector and Jobcentre Plus to ensure held with the multi-2014 Townslev agency Community characteristics referral agencies are aware of the understand the changes changes and able to provide support to Reference group and to the policy. their users. Jobcentre Plus to ensure effective signposting is taking place. Discussions will be 31<sup>st</sup> March Fern Silverio/Jenny Through equality Detailed data is not known on why these monitoring on the groups are accessing the scheme more held with the multi-2014 Townslev operation of the scheme than others. It may be that some do agency Community there are some groups not have emergency needs or these Reference Group to ensure awareness of accessing the scheme needs are met within their communities. more than others. To ensure all groups have equal access the scheme. Officers will continue to work with representatives from the Community Reference Group to raise awareness of the scheme. Continue to monitor the applicants for the Emergency Relief Scheme against the protected characteristics to ensure that, if appropriate, actions are put in place to ensure all are aware of the emergency provision of support.

#### Stage 8 - Monitoring

The full impact of the proposals may only be known after they 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? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? (Also Include in Improvement Action Plan at Stage 7)

Access to the scheme and the support provided is monitored on a monthly basis by the Emergency Relief Team. The data is provided to the Welfare Reform Governance Structure which includes a multiagency Community Reference Group.

**15.** How will the results of any monitoring be analysed, reported and publicised? (Also Include in Improvement Action Plan at Stage 7)

Scheme policy over the second year of operation of the scheme.

The Scheme will be monitored through the Welfare Reform
Governance structure which includes a multi-agency Community
Reference Group.

This EqIA reflects feedback from an overall review of the scheme which has resulted in proposed changes to the Emergency Relief

**16.** Have you received any complaints or compliments about the proposals being assessed? If so, provide details.

None however have received compliments regarding the operation of the scheme.

## Stage 9: Public Sector Equality Duty

**17.** How do your proposals contribute towards 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	
Access to the fund is open to all people who meet both the primary and secondary criteria.	Information about the Emergency Relief Scheme has been communicated widely across Harrow, including the Voluntary Sector, key	All protected groups could potentially access the Emergency Relief Scheme.	
	stakeholders, schools, GP Surgeries, Children's Centres and libraries.	By ensuring the development of the assessment criteria and the review of the scheme was carried out in an open and	

To ensure all groups have equal access Officers
will continue to work with representatives from
the Community Reference Group to raise
awareness of the scheme.

transparent manner with input from the Voluntary Sector should foster good relations between people from different groups.

Stage 10 - 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.					
<b>18</b> . Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	EqIA Quality Assurance Group				
Signed: (Lead officer completing EqIA)	Fern Silverio	Signed: (Chair of DETG)	Alex Dewsnap		
Date:	29.11.13	Date:			
Date EqIA presented at the EqIA Quality Assurance Group		Signature of ETG Chair			