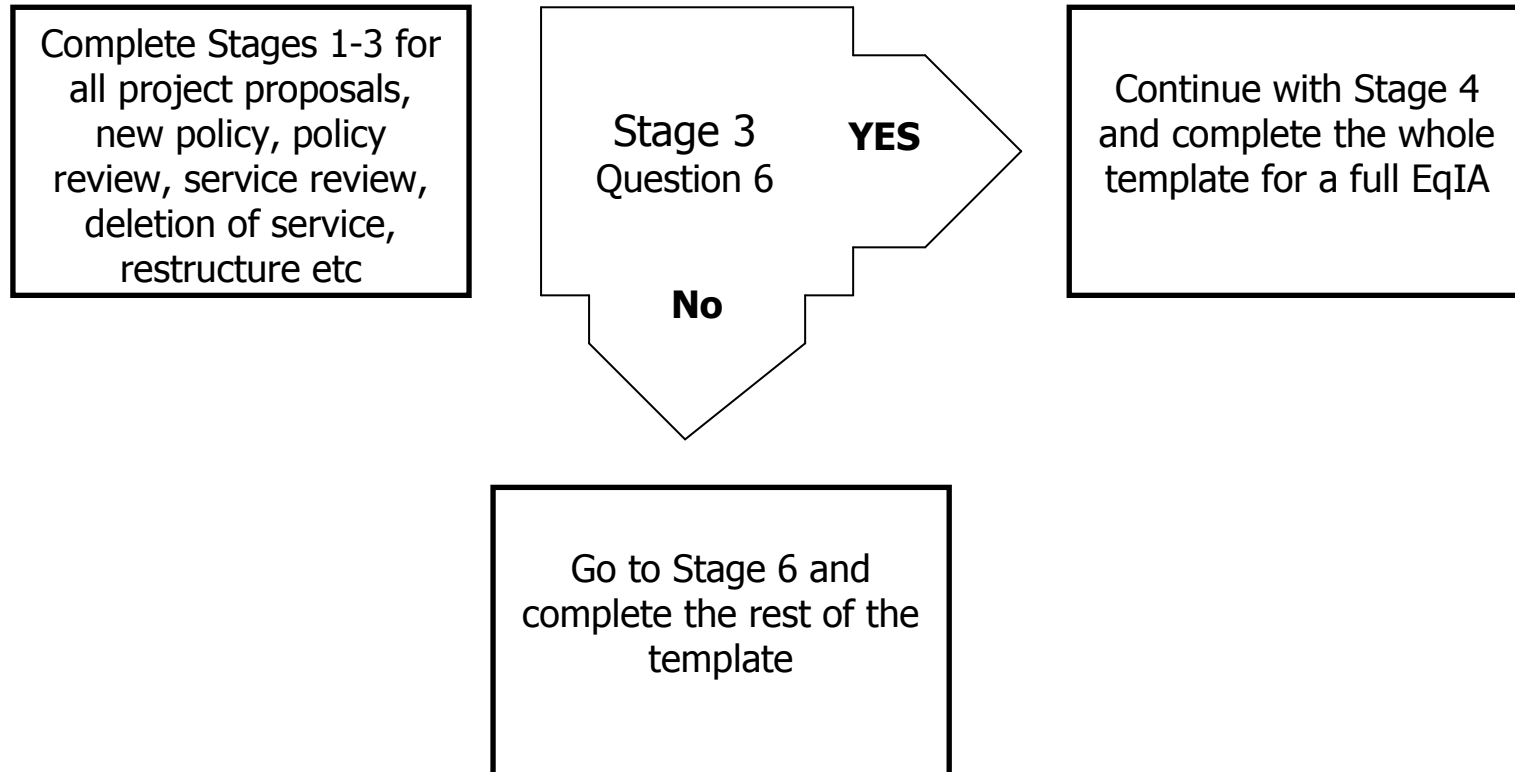


Equality Impact Assessment Template

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.



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 Decision:	Tick
Transformation			Cabinet	
Capital			Portfolio Holder	
Service Plan			Corporate Strategic Board	
Other			Other	
Title of Project:		Financial Hardship Fund Draft Policy		
Directorate / Service responsible:		Collections and Housing Benefits Resources		
Name and job title of lead officer:		Fern Silverio, Head of Service, Collections and Housing Benefits		
Name & contact details of the other persons involved in the assessment:		Bernie Beckett, Consultation Project Manager BBeckett@harrow.gov.uk Tel: 020 8736 6726		
Date of assessment:		1 st October, 2013		

Stage 1: Overview

<p>1. What are you trying to do?</p> <p>(Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p>	<p>The Financial Hardship Fund is a new pot of funding, agreed by Councillors at Cabinet in January 2013 within the Localisation of Council Tax Benefit changes. The £100k Financial Hardship Fund was developed to help support community projects that will support those experiencing most hardship from the current economic situation and/or those who need assistance to transition to the reformed welfare system. The Localisation of Council Tax Benefits EqIA, attached at Appendix A, gives further detail on the impacts of the changes and the package of mitigations put in place.</p>
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The draft Financial Hardship Fund policy includes further detail and is attached to the Cabinet Report at Appendix A.

The application process for the fund uses the same application process as the Council's Small Grants process however the decision making sits separately within the Welfare Reform Governance Structure and Resources Directorate.

The principles of the Financial Hardship Fund are:

- To provide short term support that helps people or the community to better help themselves through achieving medium to long term outcomes for individuals and groups within the community
- To help residents facing hardship to take-up benefits that they are entitled to but not claiming
- To provide support for managing finances
- To help support residents into work
- To align with the Harrow Help Scheme, Emergency Relief Scheme, HRA Hardship Fund and Xcite Employment Support Grant

The following assessment criteria for the fund meets with the principles and has been developed in partnership with the multi-agency Community Reference Group and through the Council's internal Welfare Reform group:

- Encourage the fund to be used to provide sustainable long-term support that helps people in the community to better help themselves
- Evidence of need for the proposed project/activity and
- How the project/activity will address the need that has been identified.
- How the project/activity tackles disadvantage, fosters good relations and/or promotes equality of opportunity

	<ul style="list-style-type: none"> - How the project has a positive impact adding value for the community who are impacted by the welfare reforms and economic recession - How your project/activity will deliver your proposed outcomes - How people can access the project/activity - How your project/activity will promote social value e.g. by using volunteers and promote training, skills development and learning opportunities for local residents - Clear and realistic costs for the project/activity - Exit strategy beyond the life of this funding to ensure the outcomes are sustained. <p>Guidance notes giving further detail on what the Council will fund is included within the Small Grants/Hardship Fund Application Form which is attached at Appendix B. A supporting document to the application form 'Harrow Needs: those impacted by welfare reforms and the state of the economy' provides more recent information on the possible impacts of the welfare reforms in Harrow and is attached at Appendix C.</p>					
<p>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (all that apply)</p>	Residents / Service Users		Partners		Stakeholders	
	Staff		Age		Disability	
	Gender Reassignment		Marriage and Civil Partnership		Pregnancy and Maternity	
	Race		Religion or Belief		Sex	
	Sexual Orientation		Other		Any other groups who will be supported through the proposals	
<p>3. Is the responsibility shared with another directorate, authority or organisation? If so:</p> <ul style="list-style-type: none"> • Who are the partners? • Who has the overall responsibility? • How have they been involved in the assessment? 	<p>There has been close working with Community Cultural Services, Community Health and Wellbeing Directorate to ensure the process for applications and the allocation of funding meets with corporate standards.</p> <p>The overall responsibility for the delivery of the fund lies with Collections and</p>					

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), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)

Age (including carers of young/older people)

Harrow profile: 20 per cent of Harrow's residents are aged under 16 (48,200)¹ whilst this signifies a small percentage change from 2010 estimates (0.7% change), in actual numbers it is an increase of 3,600 young people.
65.9 per cent (158,400) of Harrow's population fall within the working age bracket (16 to 64) and 14.1 per cent (33,900) of Harrow's residents are 65 years of age and older.
The average (median) age in Harrow is approximately 36 years, which ranks Harrow 284th out of 348 local or unitary authorities for age, depicting a younger average than the majority of local authorities².

The Financial Hardship Fund has been developed to help support community projects that will support those experiencing most hardship from the current economic situation and/or those who need assistance to transition to the reformed welfare system. The Assessment criteria has been developed to ensure that organisations are able to focus their projects to help all sectors of the community who are experiencing financial hardship.

The overall impact of the changes within the welfare reforms are not yet known as some have only recently been implemented and others are yet to be put in place.

From the information that is known to date the key changes within the welfare reforms impact working age households. Whilst initially it was thought that the Benefit Cap would impact approximately 700 households in Harrow the numbers have now reduced to 350. The 2012 Welfare Reform analysis

¹ Source: mid-year population estimates 2011

² Source: 2011 Census briefing note 3: September 2012; Sue Kaminska

	<p>predicted that 96% of 'over the cap' households would be families with children and the benefit reduction is greater for large families. There are approximately 11000 households impacted by the changes to Council Tax Benefits and 608 households affected by the size criteria.</p> <p>In a survey of 378 Harrow Council tenants conducted in late 2013/early 2013 feedback showed that 75% of the younger people surveyed (age group 16-24) were the least aware of the changes</p>
Disability (including carers of disabled people)	<p>Harrow profile: 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 women³</p> <p>The Financial Hardship Fund has been developed to help support community projects that will support those experiencing most hardship from the current economic situation and/or those who need assistance to transition to the reformed welfare system. The Assessment criteria has been developed to ensure that organisations are able to focus their projects to help all sectors of the community who are experiencing financial hardship.</p> <p>The overall impact of the changes within the welfare reforms are not yet known as some have only recently been implemented and others are yet to be put in place.</p> <p>People who are severely disabled and live on their own or just with a child have extra costs which are not faced by severely disabled people who have a partner or carer. Under the current system they are eligible for severe disability premium, there is no equivalent for this in Universal Credit.</p> <p>Figures are not known locally however disabled people are likely to be impacted by many different changes to their benefits which will result in a loss of income.</p>
Gender Reassignment	This data is currently not available
Marriage / Civil Partnership	This data is currently not available
Pregnancy and Maternity	This data is currently not available
Race	Harrow profile: Harrow is one of the most diverse places in the country. At the time of 2001 Census 49.9% of

³ Source: Nomis: Annual Population Survey

	<p>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 group⁴ 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.</p> <p>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 Wales⁵. 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).</p> <p>The Financial Hardship Fund has been developed to help support community projects that will support those experiencing most hardship from the current economic situation and/or those who need assistance to transition to the reformed welfare system. The Assessment criteria has been developed to ensure that organisations are able to focus their projects to help all sectors of the community who are experiencing financial hardship.</p> <p>The overall impact of the changes within the welfare reforms are not yet known as some have only recently been implemented and others are yet to be put in place.</p> <p>In a survey of 378 Harrow Council Tenants feedback showed that there was a lower than average awareness of the changes in the Asian/Asian British ethnic group.</p>
Religion and Belief	<p>Harrow profile: The 2001 Census showed that Harrow had the highest level of religious diversity of any local authority in England and Wales. This means that there is a 63 per cent chance that two people at random would be from different religious groups. We do not yet have comparative data for 2011, but the 2011 Census ranked Harrow 1st for persons of Hindu religion, Jain and Unification Church, 2nd for Zoroastrian and 6th for Jewish. Out of 348 areas in England and Wales Harrow has the 2nd lowest ranking</p>

⁴ 2011 Census: Ethnic Group. KS201EW

⁵ 2011 Census: Country of Birth (detailed). Table QS203EW

	<p>of residents with no religion and 5th lowest for Christians (37.3%). Harrow is ranked 24th for Muslim faith residents, who account for 12.5% of the population⁶</p> <p>The Financial Hardship Fund has been developed to help support community projects that will support those experiencing most hardship from the current economic situation and/or those who need assistance to transition to the reformed welfare system. The Assessment criteria has been developed to ensure that organisations are able to focus their projects to help all sectors of the community who are experiencing financial hardship.</p> <p>The overall impact of the changes within the welfare reforms are not yet known as some have only recently been implemented and others are yet to be put in place.</p>
Sex / Gender	<p>Of Harrow's total population (240,500), 118,900 (49.4%) are male and 121,600 (50.6%) are female⁷</p> <p>The Financial Hardship Fund has been developed to help support community projects that will support those experiencing most hardship from the current economic situation and/or those who need assistance to transition to the reformed welfare system. The Assessment criteria has been developed to ensure that organisations are able to focus their projects to help all sectors of the community who are experiencing financial hardship.</p> <p>The overall impact of the changes within the welfare reforms are not yet known as some have only recently been implemented and others are yet to be put in place. The Universal Credit rules have yet to be finalised however there is a risk that the single household payments could reduce women's control over resources.</p>
Sexual Orientation	<p>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</p> <p>Since their inception, a total 121 Civil Partnership ceremonies have taken place in Harrow.</p>

⁶ 2011 Census: KS209EW

⁷ Source: 2011 Mid Year Estimates

	<p>The Financial Hardship Fund has been developed to help support community projects that will support those experiencing most hardship from the current economic situation and/or those who need assistance to transition to the reformed welfare system.. The Assessment criteria has been developed to ensure that organisations are able to focus their projects to help all sectors of the community who are experiencing financial hardship.</p> <p>The overall impact of the changes within the welfare reforms are not yet known as some have only recently been implemented and others are yet to be put in place.</p>
Socio Economic	<p>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.</p> <p>The Financial Hardship Fund has been specifically developed to help people in Harrow who are suffering financial hardship.</p>
<p>5. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?</p> <p>List the Title of reports / documents and websites here.</p>	<p>The following information has helped to inform this EqIA:</p> <p>Publishing Equalities Information Meeting the Public Sector Duty January 2013 Harrow Council Our Harrow Our Story – 2013 - http://www.harrow.gov.uk/info/200041/equality_and_diversity/863/public_sector_equality_duty</p> <p>LGA, 'The Local Impacts of Welfare Reforms' August 2013</p> <p>Exemption criteria http://www.adviceguide.org.uk/england/benefits-e/benefits/the/benefit/cap/e/benefits/the/benefit/cap/and/housing/benefit/e/the/benefit/cap/and/housing/benefit/who/is/exempt.htm</p> <p>Harrow CAB report: 'Helping our Tenants to cope with welfare reform, April 2013</p> <p>Http://www.theguardian.com/society/2013/mar/27/disability-benefits-cuts-impact-demos</p>

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	X	X

YES - If there is a risk of disproportionate adverse Impact on any **ONE** of the Protected Characteristics, continue with the rest of the template.

§ **Best Practice:** 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 of the above, then go to **Stage 6**

§ Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your 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 undertaken on your proposals?

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation)

			with the affected groups, revising 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. Cumulative Impact – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic? If yes, which Protected Characteristics could be affected and what is the potential impact?					Yes		No		
10a. Any Other Impact – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion? If yes, what is the potential impact and how likely is to happen?					Yes		No		
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	Disability (including	Gender Reassignment	Marriage and Civil	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation

	carers)	carers)		Partnership					
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.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
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<p>The Hardship Fund has been developed help support community projects that will support those experiencing most hardship from the current economic situation and/or those who need assistance to transition to the reformed welfare system and therefore has a positive impact.</p> <p>The fund's assessment criteria has been designed in partnership to help residents from all protected characteristics.</p>	<p>The fund will be advertised widely to ensure all groups get the opportunity to respond.</p>	<p>By receipt of bids that cover the protected characteristics</p>	<p>TBA</p>	<p>Fern Silverio/Bernie Beckett</p>	
<p>Initial information shows that people of working age and people with disabilities are impacted by the welfare reforms.</p>	<p>The impacts of the welfare reforms will continue to be monitored. If it is found that there are any specific groups that are impacted more than others weighting will be applied to bids to ensure the projects support those most impacted</p>	<p>By monitoring the bids</p>	<p>TBA</p>	<p>Fern Silverio/Bernie Beckett</p>	
<p>Possibility that</p>	<p>Monitor the applicants for the fund</p>				

applications do not support those most financially vulnerable and are not of good quality.	against the protected characteristics to ensure that, if appropriate, in future years, applications are good quality and actions are put in place to widen the groups applying.				
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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? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	The Financial Hardship Fund grants will be monitored through both monitoring reports and visits. All successful groups will be asked to monitor client demographics against protected characteristics and outcomes.
15. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	The results of the monitoring will be reported through the Welfare Reform Governance structure
16. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	None

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
The fund is open to everybody. The	The fund is open to all groups impacted by the	All protected groups could potentially be

assessment criteria has been developed in partnership with a multi-agency Community Reference Group and Welfare Reform Officer group to ensure fair and transparent	welfare reforms. The allocation of the funding will target the groups most impacted.	affected by the welfare reforms. By ensuring the development of the assessment criteria was carried out in an open and transparent manner and helping people should foster good relations between people from different groups.
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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.

18. 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)	
Date:	16 th October, 2013	Date:	
Date EqIA presented at the EqIA Quality Assurance Group	4 th November, 2013	Signature of ETG Chair	