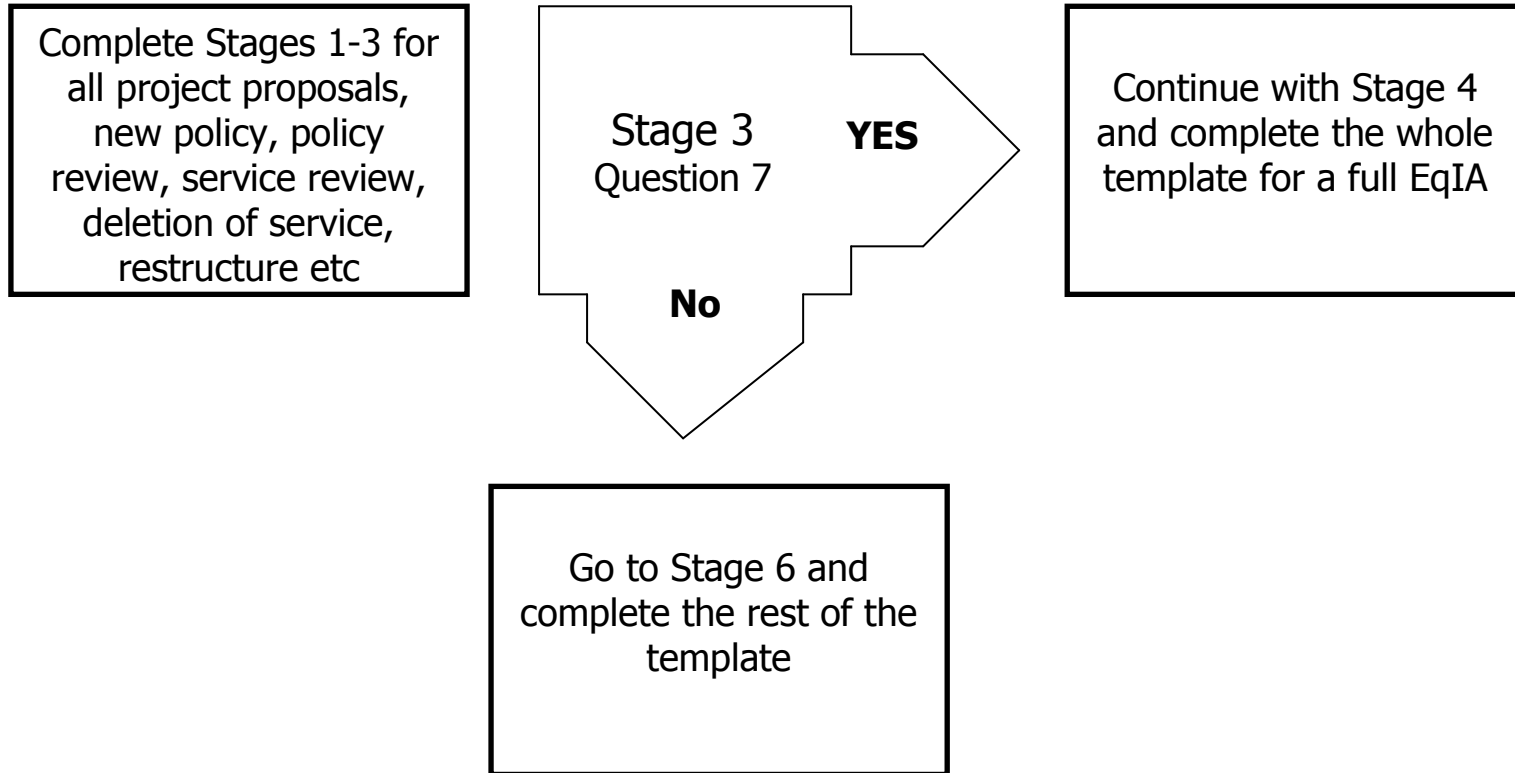


Equality Impact Assessment Template

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		<input type="checkbox"/>	Cabinet		<input type="checkbox"/>
Capital		<input type="checkbox"/>	Portfolio Holder		<input type="checkbox"/>
Service Plan		<input type="checkbox"/>	Corporate Strategic Board		<input type="checkbox"/>
Other	Budget	<input type="checkbox"/>	Other		<input type="checkbox"/>
Title of Project:		Annual Review of Fees and Charges			
Directorate / Service responsible:		Resources on behalf of all Directorates			
Name and job title of lead officer:		Dawn Calvert, Head of Strategic Finance & Business: Mike Howes, Service Manager, Policy and Partnerships			
Name & contact details of the other persons involved in the assessment:					
Date of assessment:		31 st December 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>Review all fess and charges levied by the Council against the principles set out in the Council’s fees and charges policy which states:</p> <p>“A regular review of all charges should be undertaken to ensure they are consistent with the council’s priorities and take account of service aims, market sensitivity, customer preferences, and income generation needs.</p> <p>Annual reviews of charges will consider the following factors:</p> <ul style="list-style-type: none"> • inflationary pressures - charges should be increased in line with inflation unless there is a good reason why not • the actual or potential impact of any competition in terms of price or quality
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- trends in user demand and the forecast effect of price changes
- customer survey results
- whether the particular service should be expected to cover its costs or should be subsidised, and to what extent
- council wide and service budget targets
- cost structure implications arising from developments such as investments made in the service
- alternative charging structures that could be more effective
- proposals for targeted promotions during the year, and evaluation of any that took place in the previous year
- Method and cost of income collection

The following questions, based on the Audit Commission's 2008 document "Positively Charged", are provided to assist service managers to undertake a review of their charges.

1. What do we want to achieve including:

- How much income are we trying to generate, and why?
- Whose use of services do we want to subsidise, and by how much?
- Whose behaviour are we hoping to influence, and in what ways?
- How will charges help improve value for money, equity and access to services?

2. What's the current picture?

- What is the current charge.
- How do charges compare to similar councils and other service providers?
- How are charges structured, and why?
- Are cost effective mechanisms available for paying and collecting charges
- Are income targets being achieved?

- What is the impact, intended or unintended, of charges on local people?
- Which people are using services and which aren't?
- Which users are paying for services and which aren't?
- Are concessions being taken up by the people at whom they are targeted?
- Are we maximising the take-up of related benefits in this area?

3. What do local people think of our charges?

- Have we consulted service users and the public about the current and proposed charges plus their views on value for money of the service?

4. Where do we go from here?

- What changes, if any, should we make to the level and structure of charges?
- How will we evaluate the impact of charges?
- What data will we need?
- Can we collect this data cost effectively?
- When should we next review our approach?"

The list of services for which charges are currently or are intended to be levied extends to 100 pages. Each proposal has been prepared using the policy and with the assistance of the questions set out above.

In many cases, the intention is not to increase charges this year notably in relation to key services for adult social care. In others, the level of charge is set by Government and not within the Council's control. In a number of other cases, the Council is proposing to reduce the charges. In the remaining cases, charges will rise by 4%.

Many of the charges where increases are proposed relate to discretionary services such as hiring playing fields, rooms at the arts centre or renewal of marriage vows and would not be considered as part of a shopping basket of essential goods that would contribute to a calculation of increases in the cost of living. It is not possible to calculate the percentage increase across the Board as this would depend on the

	number of times each service was accessed but it is clear, taking into account the reductions and the cases where no increase is proposed, that the average increase is below 4% and probably close to the level of inflation (2.7% RPI as at January 2014).
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2. Who are the main people/Protected Characteristics that may be affected by your proposals? (all that apply)	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			

3. Is the responsibility shared with another directorate, authority or organisation? If so: <ul style="list-style-type: none"> Who are the partners? Who has the overall responsibility? How have they been involved in the assessment? 	All Directorates – Individual Directorates have proposed the level of fees and charges.
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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) 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 authorities.
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	<p>The age profile of the users of all of the services covered by this report has not been collated but is a factor in the determination of the recommended change in charges. While general services will be accessed by people of a wide range of ages, the recommended changes in charges for key services that are age specific for older people are not being increased such as meal on wheels – no change; Day Care –reductions ranging from 5.74% to 27.81% and transport reduction of 6% for some service users and no increase for others. Where the cash price of a service is not increasing, this is equivalent to at least a 2.2% real terms reduction.</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% from the same period in 2010-11. 13,800 (17.3%) are men and 12,900 (17.7%) are women.</p> <p>The disability profile of the users of all of the services covered by this report has not been collated but is a factor in the determination of the recommended change in charges. While general services will be accessed by a wide range of people, the recommended changes in charges for key services that are disability specific are not being increased such as Blue Badges and replacement freedom and taxi cards. Where the cash price of a service is not increasing, this is equivalent to at least a 2.2% real terms reduction.</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	<p>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 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 Wales. 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</p>

	<p>are of Asian descent).</p> <p>The ethnicity profile of the users of all of the services covered by this report has not been collated but is a factor in the determination of the recommended change in charges. While general services will be accessed by people of a wide range of ages, there are no ethnicity-specific services within the scope of this report.</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 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 population.</p> <p>The religious profile of the users of all of the services covered by this report has not been collated but where it could be relevant, it is a factor in the determination of the recommended change in charges. There are no differential charges on the basis of religion or belief in relating to services within the scope of this report.</p>
Sex/Gender	<p>Harrow profile: Of Harrow's total population (240,500), 118,900 (49.4%) are male and 121,600 (50.6%) are female.</p> <p>The gender profile of the users of all of the services covered by this report has not been collated but, if appropriate, this is a factor in the determination of the recommended change in charges. While general services will be accessed by people of a wide range of ages, there are no gender-specific services within the scope of this report.</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>The sexual orientation profile of the users of all of the services covered by this report has not been collated but where it could be relevant, it is a factor in the determination of the recommended change in charges. There are no differential charges on the basis of sexual orientation in relating to services within the scope of this report.</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</p>

with 196 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.

Many of the charges where increases are proposed relate to discretionary services such as hiring playing fields, rooms at the arts centre or renewal of marriage vows and would not be considered as part of a shopping basket of essential goods that would contribute to a calculation of increases in the cost of living.

In many cases, the intention is not to increase charges this year. In others, the level of charge is set by Government and not within the Council's control. In a number of other cases, the Council is proposing to reduce the charges, notably in relation to key services for adult social care.

It is not possible to calculate the percentage increase across the Board as this would depend on the number of times each service was accessed but it is clear, taking into account the reductions and the cases where no increase is proposed, that the average increase is below 4% and probably close to the level of inflation (2.1% for CPI and 2.6% for RPI)

5. What consultation have you undertaken on your proposals? None

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).

6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment? Service usage information; cost of service provision information; costs of services in other neighbouring boroughs

List the Title of reports/documents and websites here.

Stage 3: Assessing Potential Disproportionate Impact

7. 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

8. What additional data/evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?

(include this evidence, including any data, statistics, titles of documents and website links here)

9. What further consultation have you undertaken on your proposals as a result of your analysis at Stage 3?

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

Stage 5: Assessing Impact and Analysis

10. 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				
11. Cumulative 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 Protected Characteristics could be affected and what is the potential impact?										
11a. 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			
12. 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										
13. 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. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 7</i>	
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 13a 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)	
13a. If your EqIA is assessed as outcome 3 or you have ticked 'yes' in Q12 , explain your justification with full reasoning to continue with your proposals.	

Stage 7: Improvement Action Plan

14. 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

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.

<p>15. 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></p>	<p>The policy requires that a regular review of all charges should be undertaken to ensure they are consistent with the council's priorities and take account of service aims, market sensitivity, customer preferences, and income generation needs including:</p> <ul style="list-style-type: none"> • inflationary pressures - charges should be increased in line with inflation unless there is a good reason why not; • the actual or potential impact of any competition in terms of price or quality; • trends in user demand and the forecast effect of price changes; • customer survey results; • whether the particular service should be expected to cover its costs or should be subsidised, and to what extent; • council wide and service budget targets; • cost structure implications arising from developments such as investments made in the service; • alternative charging structures that could be more effective; • proposals for targeted promotions during the year, and evaluation of any that took place in the previous year; • Method and cost of income collection.
<p>16. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>Results of reviews of fees and charges will be part of the next annual review.</p>
<p>17. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.</p>	<p>None</p>

Stage 9: Public Sector Equality Duty

18. 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
Nil	Nil	Nil

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.

19. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?			
Signed: (Lead officer completing EqIA)	Mike Howes	Signed: (Chair of DETG)	Alex Dewsnap
Date:	9 th January 2014	Date:	
Date EqIA presented at the EqIA Quality Assurance Group		Signature of ETG Chair	