Department: Insurance

Function/Policy: Properly identify and manage insurable risks

Introduction

The purpose of this function is to protect the Council's assets from financial loss arising by effecting appropriate insurance cover for risks identified.

This function benefits not only internal customers but also external customers by ensuring that adequate insurance is in place to protect against risks that may occur.

It is perceived that there are no specific issues relating to race equality with this function.

Sources of Evidence

Evidence used for the impact assessment undertaken included the draft 2005/6 Draft Service Plan, interviews with key service personnel and financial regulations.

Results of Impact Assessment / Monitoring / Consultation

The Impact Assessment for this function identified the following:

- There are no current means of evaluating whether contractors comply with the Council's Equal Opportunities Scheme.
- There has been no recent direct consultation with stakeholders or customers concerning service provision.
- Forms and literature are provided in only one language.

Conclusions

There is a need to consider developing engagement with internal and external customers and developing literature in alternative languages where appropriate. When the Insurance service is retendered in 2005/6, the contract will incorporate the Council's Equal Opportunities requirements.

Proposed Action

Consultation with internal and external customers will be undertaken to assist in the development of the service and identifying service priorities and the provision of literature in other key languages will be made available upon request.

The contract specification for the Insurance service will include the Council's Equal Opportunities requirements when it is tendered during 2005/6.

Results of the Impact Assessment will be published on the Harrow Council Intranet.

Department: Harrow IT Services

Function/Policy: Develop/advise on IT policy

Introduction

HITS provides IT advice to staff, members and other Council stakeholders to enable the effective use of IT systems to meet business needs. HITS will offer advice on operational IT issues as well as strategic issues.

Sources of Evidence

Internal and external groups were written to and sent a copy of the IT strategy for comments

Results of Impact Assessment / Monitoring / Consultation

There is no evidence to confirm adverse impact although there is a lack of ICT policy to support staff with IT Special Needs.

Conclusions

Although there is no evidence of adverse impact nor that lack of ICT policy to support staff with IT Special Needs is resulting in inequality in service, further consultation in developing such a procedure would help confirm whether this was the case.

Proposed Action

It is suggested that a study is undertaken to check if there is any impact.

Department: Harrow IT Services

Function/Policy: Systems support

Introduction

This service works to develop, procure, implement and support IT systems to facilitate the smooth running of the Council's day to day activities. This includes support for non standard IT equipment.

This function will also provide customers with multiple channel options to access the Council's services.

Sources of Evidence

Internal and external groups were written to and sent a copy of the IT strategy for comments

Results of Impact Assessment / Monitoring / Consultation

There is no data to confirm that non English speaking residents suffer inequality because the internet is written in English only.

Conclusions

According to the 2001 census, over 40% of Harrow residents belong to an ethnic minority. A study is required to determine if there is a requirement to provide e-services in multiple languages. The results of this study should be taken into account in finalising the access strategy.

Proposed Action

It is suggested that a study is undertaken to check if there is any impact prior to implementation of the Access Strategy. This needs to be done in conjunction with the Business Transformation Partner (BTP) when this is identified.

Department: Car Loans / Car Leasing

Function/Policy: Car Loans / Car Leasing

Introduction

The car loan scheme provides financial assistance in the form of a loan to employees who are essential car users. The car leasing scheme formerly provided a leased car to certain qualifying staff although this function is being phased out and now only remains operative for some existing staff for a period of up to four years after they commenced employment.

The objective of the car loan function is to enable staff that are "essential car users" to effectively fulfil the duties of their post as well as improve disabled employees ability to get to work and / or do their job. Both the car loan and car leasing schemes are only available to Council employees.

It is important that the service is administered in compliance with the Council's Equal Opportunities Scheme although the service is not perceived as having any specific issues concerning race equality.

Sources of Evidence

Evidence used for the impact assessment undertaken included the draft 2005/6 Draft Service Plan, interviews with key personnel administering the function and the Council's Car Loan Scheme documentation.

Results of Impact Assessment / Monitoring / Consultation

The impact assessment did not highlight any specific issues relating to race equality. However, the following general issue was identified: The car loan scheme offers interest free loans to staff employed at grade POB and above provided that they agree to a variation in their contract terms. Staff graded below POB are required to pay interest. There is a potential for an adverse impact to arise from this differential although it is considered that this would be mitigated at least in part, by the variation in contract terms required with the interest free option.

Conclusions

There are no specific concerns arising from this impact assessment relating to race equality.

Proposed Action

There are no proposed actions required from this impact assessment relating to race equality. Results of this Impact Assessment will be published on the Harrow Council Intranet.

Department: Housing Benefits (HB)

Function/Policy: HB Prevention and Detection of Fraud

Introduction

The HB Prevention and Detection of Fraud function exists to provide a secure Housing Benefit and Council Tax Benefit service and reduce the risk of fraud and error.

The achievement of this objective is important in safeguarding Council Tax Payers money and giving assurance to residents that the Council actively protects its financial interests.

It is therefore essential that in achieving these objectives, procedures and policies applied are consistent and fair and perceived to be fair by the community that they are intended to protect. Compliance with the Race Equality Scheme is therefore a significant factor in providing this assurance.

Sources of Evidence

Evidence used for the impact assessment undertaken included the draft 2005/6 Draft Service Plan, interviews with key personnel, Counter Fraud Policy and Strategy and Service procedures.

Results of Impact Assessment / Monitoring / Consultation

The Impact Assessment for this function identified that there is no existing mechanism in place to measure whether the function has a differential impact in terms of prosecutions and sanctions.

Conclusions

It is considered that recording the effect of prosecutions and sanctions on minority groups could assist with the definition of the future Benefits service and Fraud strategy although the recording and holding of this data will need to be in compliance with Data Protection requirements.

Proposed Action

The impact of the Fraud function on minority groups will be recorded and analysed subject to Data Protection advice with the results used to assist in defining the future Benefits and Fraud service strategy. Results of the Impact Assessment will be published on the Council Intranet.

Department: Housing Benefits (HB)

Function/Policy: HB Take Up

Introduction

The HB Take Up policy defines how the Council intends to promote the take up of Housing Benefit and ensure that persons with a genuine entitlement to Benefit apply.

It is therefore important that the manner in which any promotion is undertaken and the media used reach all sections of the community. The take up campaign needs to address how this will be achieved to provide equality of access and compliance with the Race Equality Scheme is seen as essential in supporting this achievement.

Sources of Evidence

Evidence used for the impact assessment undertaken included the draft 2005/6 Draft Service Plan, interviews with key personnel, Take Up Policy and Statistics.

Results of Impact Assessment / Monitoring / Consultation

The Impact Assessment for this function identified that the existing policy has not been the subject of consultation with representative community groups and the literature generally available is printed in only one language.

Conclusions

It is considered that the take up policy should be the subject of future consultation with representative community groups and consideration should be given to producing the policy and promotional literature in alternative languages.

Proposed Action

Consideration will be given to producing the policy in alternative languages besides English and the policy will be the subject of consultation with key stakeholders and representative groups for 2005/6. Outcomes resulting from the 2004 Take Up policy will be used to assist in defining the 2005 Take Up plan.

Results of the Impact Assessment will be published on the Council Intranet and in the Harrow newsletter.

Department: Financial Assessments

Function/Policy: Social Care Assessments

Introduction

This function provides financial assistance to customers with a qualifying entitlement where they are in receipt of residential or domiciliary care.

The objectives of this function are to:

Establish whether a client is required to make a financial contribution for their residential or domiciliary care provision.

Notify the client of their entitlement to financial assistance.

Establish and notify the client of any additional information requirements. Provide financial assistance to clients to maximise their income.

Review charging levels on a periodic basis.

Apply consistent practices and procedures to the decision making process.

The service has close interaction with internal and external customers providing financial assistance to customers receiving residential or domiciliary care. It is therefore important that procedures and practices are applied consistently and fairly and that policies developed are perceived as fair and equitable. Compliance with the Race Equality Scheme is essential in demonstrating this assurance to customers.

Sources of Evidence

Evidence used for the impact assessment undertaken included the draft 2005/6 Draft Service Plan, interviews with key service personnel, leaflets and service literature and web site details.

Results of Impact Assessment / Monitoring / Consultation

The Impact Assessment for this function identified the following: There has been no recent direct consultation with stakeholders or customers concerning the level of service provision.

Forms and literature are provided in only one language.

Discretionary areas of the service are not currently documented and agreed.

Conclusions

There is a need to consider developing engagement with internal and external customers and developing literature in alternative languages. Consideration should also be given to documenting and agreeing a policy for the discretionary areas of the service.

Proposed Action

Consultation with internal and external customers will be undertaken to assist in the development of the service and identifying service priorities and the provision of literature in other key languages will be made available upon request. Discretionary areas of the service will be documented and policies agreed with key stakeholders.

Results of the Impact Assessment will be published on the Harrow Council Intranet and in the Harrow newsletter.

Department: Housing Benefits

Function/Policy: Discretionary Housing Payments (DHP)

Introduction

Discretionary Housing Payments are intended to provide additional financial assistance to existing Housing Benefit customers where certain eligibility criteria are met. They are discretionary by nature and the Council is given a cash limited sum each year that can be used to make these payments.

The provision of a cash limited sum for this function means that it is of prime importance that customers understand that the scheme exists and how it operates in order to ensure equality of access. As award of entitlement is discretionary, there is a need to ensure that representative community groups and individual customers are aware of the criteria applied by the Council in determining eligibility.

Accessibility to application forms, literature explaining the scheme and consultation on eligibility criteria are therefore key components of this function. Compliance with the Race Equality Scheme is therefore considered as essential in meeting this requirement.

Sources of Evidence

Evidence used for the impact assessment undertaken included the draft 2005/6 Draft Service Plan, interviews with key personnel, service statistics and the DHP policy.

Results of Impact Assessment / Monitoring / Consultation

The Impact Assessment for this function identified an absence of application forms in the customer reception area and on the Council website with available information existing only in English. The existing DHP policy has not been the subject of recent consultation with local welfare groups and other relevant stakeholders.

Conclusions

It is considered that any potential adverse impact could be mitigated by providing DHP application forms at the Council reception area and by making them available at key customer locations and on the Council website. The existence of the scheme could be more widely promoted and consultation with local welfare and representative community groups undertaken.

Proposed Action

DHP application forms will be provided at the Council reception area and made available on the Council website. The existence of the scheme will be more widely promoted and consultation with local welfare and representative community groups will be undertaken. Results of the Impact Assessment will be published on the Council website and in the Harrow newsletter.

Department: Revenues

Function/Policy: Council Tax Code of Collection

Introduction

Council Tax is collected from nearly 85,000 domestic properties in the Borough and in order to maximise collection, it is essential that customers are aware of their options for making payment and any reductions that may be available to reduce the amount they pay.

The objectives of the Council Tax Code of Collection function are to inform customers how they may reduce their payments, pay their Council Tax and communicate the standard of service they can expect.

A significant number of representative groups already exist that represent their members' interests and the diverse composition of the community. These represent a potential source of "untapped wealth" in identifying customer requirements and developing effective communication channels.

There is a need to apply consistent and fair procedures to the collection of Council Tax within the legal framework both to ensure that customers perceive the processes to be fair as well as to maximise potential revenue collection. Compliance with the race equality scheme is therefore essential in achieving this requirement.

Sources of Evidence

Evidence used for the impact assessment included the draft 2005/6 Draft Service Plan, interviews with key personnel, Bailiff Contract Specification, Code of Conduct and service procedures.

Results of Impact Assessment / Monitoring / Consultation The Impact Assessment for this function identified the following:

The code of conduct for Council Tax collection is currently only available in the English language and was last updated in 2003.

There are no existing formal monitoring arrangements in place with the Council's Bailiff to review their compliance with the Council's Equal Opportunities policy.

Conclusions

It is considered that the code of conduct for Council Tax collection should be updated to address both changes in practice and policy. The revised code of conduct should be subject to consultation with relevant service users and groups and considered for publication in alternative languages. Bailiff compliance with the Council's Equal Opportunities requirements should be introduced as a formal agenda item at contract review meetings.

Proposed Action

The Council Tax code of conduct will be updated and subject to consultation with relevant service users and representative community groups. Consideration will be given to providing the code of collection in more than one language and routine monitoring of Bailiff compliance with the Council's Equal Opportunities Policy will be introduced for contract review meetings.

Results of the Impact Assessment will be published on the Harrow Council Intranet and in the Harrow newsletter.

Department: Revenues

Function/Policy: Business Rates Collection

Introduction

The objectives of the Business Rate function are to maximise the collection of Business Rates and to deliver a cost effective and customer responsive service that secures value for money.

Business Rates are collected from nearly 6000 commercial properties in the Borough. To maximise collection, it is essential that customers are aware of their payment options and any reductions available to reduce the amount they have to pay.

The business community is diverse, with business interests being represented by organisations such as the Chamber of Commerce and Local Traders Associations.

There is a need to apply consistent and fair procedures to the collection of Business Rates within the legal framework to ensure that customers perceive the processes to be fair and to maximise revenue collection.

Sources of Evidence

Evidence used for the impact assessment undertaken included the draft 2005/6 Draft Service Plan, interviews with key personnel, Bailiff Contract Specification and service procedures.

Results of Impact Assessment / Monitoring / Consultation

The Impact Assessment for this function identified that there is not an existing code of conduct for Business Rates collection and that the payment telephone line for customers wishing to pay by Debit or Credit card uses the English language only. There are no current formal monitoring arrangements existing with the Council's Bailiff to ensure their compliance with the Council's Equal Opportunities policy.

Conclusions

It is considered that a code of conduct for Business Rates collection should be established and subject to consultation with relevant service users and groups. Consideration should also be given to the provision of the payment telephone line in more than one language. Bailiff compliance with the Council's Equal Opportunities requirements should be introduced as a formal agenda item at contract review meetings.

Proposed Action

A Business Rates code of conduct will be established and subject to consultation with relevant users and groups. Consideration will be given to providing the payment telephone line in more than one language having regard to costs and technical feasibility and routine monitoring of Bailiff compliance with the Council's Equal Opportunities Policy will be introduced.

Results of the Impact Assessment will be published on the Harrow Council website and in the Harrow newsletter.

Department: Exchequer Services

Function/Policy: Cashiers - Payments to Customers

Introduction

The Cashiering service issues payments to customers for a variety of purposes including Housing Benefit entitlement, refunds of Revenues and Clothing grants to Asylum Seekers.

The objectives of this function are to support internal services in the achievement of their objectives by the provision of a payments service to customers that gives value for money and distributes payments to customers in accordance with service users agreed timescales and timetables.

This service function has a substantial amount of interaction with customers both internal and external to the organisation. Therefore, race equality is an important and significant element of this service.

Sources of Evidence

Evidence used for the impact assessment undertaken included the draft 2005/6 Draft Service Plan, observation and interview with key personnel administering the function.

Results of Impact Assessment / Monitoring / Consultation

The following specific issues were identified from the impact assessment undertaken and require consideration:

General literature is available within the Cash Office using only the English language.

There has been no recent direct consultation with internal and external service providers concerning service provision.

Conclusions

Consideration should be given to displaying posters and literature in the Cash Office using other languages besides English.

Consultation with customers should be undertaken in relation to proposed service developments and to establish their key issues of importance that require consideration.

Proposed Action

Posters and literature in the Cash Office will be produced in alternative languages where appropriate and consultation with service users regarding key service developments will be established and undertaken to ensure that the needs and views of the community and representative groups are considered.

Results of this Impact Assessment will be published on the Harrow Council Intranet and Harrow newsletter.

Department: Exchequer Services

Function/Policy: Cashiers - Receipt of Payments

Introduction

The Cashiering function receives payments from customers on behalf of the Council.

The objectives of this function are to bank payments received on the date of receipt or on the next working day where payment is received after 3.30 p.m. The function also provides customer choice in payment facilities for Harrow Council customers and supports internal services in the achievement of their objectives by the provision of a service that gives value for money.

The service has a substantial amount of interaction with both internal and external customers and therefore race equality is an important and significant element of this service.

Sources of Evidence

Evidence used for the impact assessment undertaken included the draft 2005/6 Draft Service Plan, observation and interview with key personnel administering the function.

Results of Impact Assessment / Monitoring / Consultation

The following specific issues were identified from the impact assessment undertaken and require consideration:

The existing payment telephone line facility offered to customers, the payment kiosk for customers to make payments, and general literature available within the Cash Office, only use the English language.

There has been no recent direct consultation with internal and external service providers regarding service issues.

Conclusions

Consideration should be given to offering alternative language facilities for the customer payment telephone line and payment kiosk(s) and to displaying posters and literature in the Cash Office using alternative languages.

Consultation with external and internal service users should be considered to engage the community in service development issues, address the needs of key representative community groups, and resolve specific customer issues arising.

Proposed Action

The potential costs and feasibility of updating the payment telephone line and kiosk to incorporate additional languages will be established and considered.

Posters and literature in the Cash Office will be produced in alternative languages where appropriate and consultation with customers regarding key service developments and priorities should be established and undertaken.

The results of this Impact Assessment will be published on the Harrow Council Intranet and in the Harrow newsletter.

Department: Exchequer Services

Function/Policy: Accounts Payable

Introduction

The Accounts Payable function arranges for all invoices to be paid within 10 working days of receiving completed instructions and inputs and pays all car allowance instructions by the 5th of each month for transfer to the salaries system by 13th of each month.

There is also a requirement to process and pay invoices within the service target of 30 days from the invoice receipt date and to administer the Construction Industry tax scheme that applies to all companies in the construction industry.

The provision of this function is considered to be a fundamental support service that serves both internal and external customers and therefore ensuring that customers understand how it operates and the service standards they can expect is essential.

All correspondence generated through this function uses the English language and it is considered that this could adversely impact upon customers not possessing English as their first language.

As customers are mainly businesses and organisations, the extent of this impact could be perceived to be of less significance than for individual customers. However, as the organisations are themselves comprised of staff representing a diversity of cultures, service equality remains paramount.

It is anticipated that as consultation with internal and external customers develops, views and comments generated through the consultation process will assist with service planning, service development and increased levels of customer satisfaction.

Sources of Evidence

Evidence used for the impact assessment undertaken included the draft 2005/6 Service Plan, procedures and interviews with key service personnel.

Results of Impact Assessment / Monitoring / Consultation

The results of the assessment identified potential inconsistencies in application of the Accounts Payable function, occasional delays in processing invoices from within the originating departments and a current absence of information from service users on their views of the function. However, there were no specific indications to suggest that different racial groups were being adversely affected by this function.

Conclusions

It is considered that any potential adverse impact that may arise from inconsistencies in the application of discretionary areas of the service could be mitigated by drafting a payment policy for discussion and agreement with key stakeholders and undertaking wider consultation with service users for their views on the service. Additional monitoring of internal service users performance in submitting invoices for payment will assist in ensuring that key Best Value Performance Indicator target times are met and reduce the potential for payment delays and hence customer enquiries and complaints.

Proposed Action

Internal and external service users will be consulted regarding service provision and a draft payment policy will be drafted for their consultation. The performance of other Council services in progressing the payment of invoices to the Accounts Payable team promptly will also be recorded to enable prompt remedial action to be taken where frequent delays are identified. Results of the Impact Assessment will be published on the Intranet and Council website.

Department: Insurance

Function/Policy: Internal audit

Introduction

The internal audit team supports the organisation in managing risk, achieving objectives, and driving improvement. It does this by reviewing the effectiveness of control systems and advising on how these can be improved.

Sources of Evidence

The draft service plan for 2005/6, consultation with senior management on the contents of the audit annual plan and service delivery for 05/06 and client questionnaires.

Results of Impact Assessment / Monitoring / Consultation
The Impact Assessment for this function identified no evidence of adverse impact.

Conclusions

While there is no evidence of adverse impact, the effect of the function on minority groups will be monitored by recording and analysing the views expressed by all service users consulted.

Proposed Action

IA Strategic Plan has a review of Equal Opportunity systems in place across the Council scheduled for 2006/07.

Results of the Impact Assessment will be published on the Harrow Council Intranet.

Department: Corporate Finance

Function/Policy: Pension Fund Investments

Introduction

Pension Fund investments affect all members of the Harrow Pension Fund. The service does not impact on the community at large other than potential cost to the council tax-payer if the Pension Fund is underfunded.

Sources of Evidence

Monitoring is actioned via

- Annual Service Plan;
- Publication of the Statement of Investment Principles;
- Reports to Council Members;
- Report(s) from the external auditor.

Results of Impact Assessment / Monitoring / Consultation

No views have been received but interested persons who do not have English as their first language could potentially be restricted from accessing details of Pension Fund investments as communications are issued in English only.

Conclusions

Issue can be address through promotion on the Council website. The website to give summary details of the investment activities of the Pension Fund together with communication access via contact phone number / e-mail address if interested persons required assistance. The contact point would be noted in other languages to reduce any potential adverse impact.

Proposed Action

Seek to publicise a telephone contact number / e-mail address on the Council's intranet and website.

Department: Procurement & Community Links

Function/Policy: Issue of Tenders

Introduction

The Procurement Team, in line with the Contract Procedure Rules, is responsible for the issue of tenders and quotations to suppliers, and providing support and advice on both, based on a requirement identified within the Council.

The procurement process should achieve best value for public money spent, be consistent with the highest standards of integrity, ensure fairness in allocating contracts, comply with all legal requirements, including EU Procedures, ensure that Non-Commercial Considerations do not influence any Contracting Decision, comply with the Council's corporate and departmental aims and policies and support the Council's methodology and procurement strategy.

In line with the above, therefore, discrimination issues, whether due to race, religion, age, sex, sexual orientation or disability, should be considered in a proportionate manner throughout the procurement process – from identifying customer needs and considering options through to the way projects are advertised and evaluated.

Sources of Evidence

Evidence used for the impact assessment undertaken included the 2005/6 Business Connections Service Plan, observation and interview with key personnel administering the function.

Results of Impact Assessment / Monitoring / Consultation

It was found that all temporary staff corporate contracts deliver quarterly equalities management information on temporary staff supplied to the Council.

All tenders and communication issued to suppliers are in the English Language.

There has been no recent consultation with internal and external service users regarding service issues.

Conclusions

Harrow Council will ensure that its procurement policies support council corporate strategy through the inclusion of a questionnaire and 'Discrimination and Promotion of Equality' statement to be signed by suppliers in all future invitations to tender. This will be supported by:

- a) **Insisting** that our appointed contractors share and help deliver our equal opportunities goals;
- b) **Making** sure our selection and tendering processes positively address and include equality considerations;
- c) **Rigorously** monitoring our contracts for compliance;
- d) **Training** staff in equalities issues for procurement.

Proposed Action

The Contract Procedure Rules are currently under review and will be revised by August 2005. Racial equality issues will be considered when reviewing the document and necessary amendments will be made where required to strengthen the policy.

Based on monitoring that will be carried out on the return of questionnaires in tenders and on the survey of current corporate suppliers, needs will be assessed and addressed.

However, in the interim, consideration will be given to adding a footnote to tender documents regarding the availability of translation services should these be required to interpret the Invitation to Tender.

Department: Corporate Finance

Function/Policy: Financial Accounting

Introduction

Service aims to provide a full, cost effective and timely, financial management and advisory service to Council Members and service directorates.

Sources of Evidence

Monitoring is actioned via

- Annual Service Plan;
- Reports to Council Members;
- Report(s) from the external auditor.

The Council also actions annual budget consultation programmes which are publicised in the local press and the Council website.

Results of Impact Assessment / Monitoring / Consultation

No views have been received on financial management equality issues but interested persons who do not have English as their first language could potentially be restricted from accessing details of financial information as communications are issued in English only.

Conclusions

Issue can be addressed through promotion on the Council website. The website to give summary details of the investment activities of the Pension Fund together with communication access via contact phone number / e-mail address if interested persons required assistance. The contact point would be noted in other languages to reduce any potential adverse impact.

Proposed Action

Seek to publicise a telephone contact number / e-mail address on the Council's intranet and website.

Department: Business Connections

Function/Policy: Health & Safety

Introduction

The purpose of the function is to undertake independent information gathering and research from all relevant sources to provide information to the council, departmental management, Safety Groups, Safety Committees on access to health safety and welfare by BME employees of the council.

Its relevance to race equality lies in several different areas. Examples are monitoring the implementation of policies, codes of practice and safety performance measures in order to ensure that BME employees and others are not discriminated against in access to health, safety and welfare in the council; enabling users to make competent and relevant assessments of risks and options for associated precautionary measures where they could have an adverse and disproportionate effect on BME employees and others; working with all sectors of the Council to highlight and champion proactive approaches to prevent sickness absence or ill health and accidents associated with work safety, to support Occupational Health in promoting action, events and campaigns for positive good health and well being that recognises and meets the needs BME employees.

Sources of Evidence

The uptake of all courses provided by ethnic group and disability. Feedback on course tutors and materials

Reported accidents/ incidents to determine the impact on different racial groups with respect to their representation in the council. Reported acts of violence and aggression to identify for evidence racially motivated acts.

The 2005 HSE Management Inspection of the Council highlighted weakness in the current coverage of employees for consultation purposes.

Results of Impact Assessment / Monitoring / Consultation

Black and Minority Ethnic groups are concentrated in low status jobs in the council as evidence in council monitoring data; many are not members of trade unions or the currently recognised union. There are also others who are subject to TUPE, but where the new employer may not recognise trade union membership.

HSE research report has highlighted the disproportionate experience of stress suffered by BME groups and the role of discrimination as a causative factor.

Conclusions

Further work is needed on quantifying the impact on BME groups.

Proposed Action

Further monitoring will be included as part of the Revitalising Health and Safety strategy, monitoring of contractors and the Post Inspection Action Plan produced in response to HSE management inspection.

Department: Legal Services

Function/Policy: In-house Legal Practice

Introduction

To deliver high quality legal advice and representation to enable Harrow to meet its corporate objectives

Sources of Evidence

There was extensive consultation with clients in 2004

All clients are asked for feedback/comments

Results of Impact Assessment / Monitoring / Consultation

No evidence of adverse impact

Conclusions

Consider role in induction of new staff

Proposed Action

Raise profile on induction

Department: Legal Services

Function/Policy: Committee Room Letting

Introduction

This service ensures Members and Officers have access to committee rooms and the Council chamber for meetings, and community groups have access to unused facilities

Sources of Evidence

Regular feedback from users

Results of Impact Assessment / Monitoring / Consultation

No evidence of adverse impact – community groups complain when meetings cancelled, but no adverse impact

Conclusions

No evidence of adverse impact

Proposed Action

None – but computerised room booking system planned

Department: Chief Executive

Function/Policy: Election Services Elector Registration

Introduction

To ensure fair elections and to encourage voter participation and registration. To work with the political groups and electoral staff to improve voter confidence.

Sources of Evidence

Statistics of voter registration and participation – available in a word basis.

Feedback from votes at recent elections.

Results of Impact Assessment / Monitoring / Consultation

No adverse impact identified but improvement plan to increase knowledge of voter perceptions and knowledge and improve access to services.

Conclusions

No statistics available to reveal different patterns of participation but improvement plan addresses possible areas of concern.

Proposed Action

Improvement Plan

Department: Legal Services

Function/Policy: Land Charges Unit

Introduction

Those planning a land transaction can search a local authority database on payment of a fee

Sources of Evidence

The service is available to all, in person, on paper and electronically

No evidence of adverse impact

Results of Impact Assessment / Monitoring / Consultation

No evidence of adverse impact

Conclusions

No evidence on adverse impact

Proposed Action

None

Department: Legal Services

Function/Policy: Registration of Births, Deaths and Marriages

Introduction

This is a statutory national service managed by the Registrar General's office, and delivered locally by Harrow staff

Sources of Evidence

Anecdotal evidence suggests immigration controls on Right to Marry may have an adverse impact

Results of Impact Assessment / Monitoring / Consultation

None done as no local discretion

Conclusions

Harrow staff have no discretion about the rules they apply, which are set nationally

Proposed Action

Monitor client perception/views

Department: Legal Services

Function/Policy: Democratic Services

Introduction

This function supports Members' decision-making

Sources of Evidence

Members were consulted in 2004

Results of Impact Assessment / Monitoring / Consultation

No evidence of adverse impact

Conclusions

No action planned, but Council needs to consider issue of translation etc for Member reports

Proposed Action

None

Department: Chief Executive's

Function/Policy: Reception desk at Civic Centre

Introduction

The Civic Centre reception team comprises a manager and three reception/information officers whose duty it is to meet and greet council customers and deal with their initial inquiries. They also maintain the council's internal information contact details and acknowledge and redirect emails coming into the council from members of the public. It is important that all customers from whatever culture or race feel equally treated when being dealt with by Civic Centre reception.

Sources of Evidence

Feedback from customer comment cards Feedback from individual letters received from customers

Results of Impact Assessment / Monitoring / Consultation No adverse impact identified. Monitoring and consultation as outlined in the Improvement plan.

Conclusions

The Civic Centre reception staff are themselves from a wide ethnic mix. Their role is likely to change under First Contact proposals, but the service they currently offer is courteous and efficient and appreciated.

Proposed Action

Preparation for changes under First Contact will be undertaken in the coming months.

Department: Chief Executive's

Function/Policy: Press and PR

Introduction

The Communications Unit supplies information the residents, businesses and media in Harrow and helps promote the council's messages. It has a duty to ensure that those messages are delivered in a manner which is unbiased and easily understood by all sections of the community.

Sources of Evidence

The Unit ensures that information it is supplying is delivered to relevant ethnic media as well as local media. It ensures that translation boxes with relevant phone numbers are available on council publications and that council publishers are aware of the arrangements.

These guidelines, outlined in the council communications strategy, have been drawn up in consultation with partner and disability groups as well are reference to various reader and resident surveys/consultations. They are reviewed regularly, in line with the regular review of the Communication Strategy.

Results of Impact Assessment / Monitoring / Consultation No adverse impact identified but monitoring and consultation to continue as outlined in improvement plan and communications strategy

Conclusions

We need to ensure we maintain a supply of information to a wide range of publications and communities. This will be done through constant review.

Proposed Action

To maintain reviews and follow Improvement Plan actions

Department: Chief Executive

Function/Policy: Corporate Complaints System

Introduction

To provide one system for complaints throughout the Council.

To lay down standards of handling complaints.

Sources of Evidence

Information on complaints by ethnic origin of complaint is now being collected.

Results of Impact Assessment / Monitoring / Consultation

No adverse impact as yet identified.

Response will depend on information collected.

Conclusions

No statistics yet available.

Proposed Action

To collect this data and respond accordingly.

To provide one system for complaints throughout the Council.

To lay down standards of handling complaints.

Department: Chief Executive's

Function/Policy: Mayor's Office

Introduction

The Mayor's office oversees the work of the Mayor and Deputy Mayor, maintaining and organising the diary and ensuring that the Mayor is able to carry out his or her functions as the civic head of the borough. It is incumbent on the office to ensure that the mayor attends a full range of visits covering all aspects and cultures within the community.

Sources of Evidence

The Mayor's diary is maintained to ensure a balance is kept and that all invitations are monitored and responded to. Members are regularly consulted.

Results of Impact Assessment / Monitoring / Consultation
No adverse impact identified. Monitoring and consultation to continue
as stated in improvement plan.

Conclusions

The service offered by the Mayor and the Mayor's office is considered a valuable asset to the borough.

Proposed Action

Actions to monitor and maintain the equality of the mayor's engagements and actions will continue.

Department: Organisational Development

Function/Policy: Development and implementation of the Lifecycle Management function within HR & OE.

Introduction

This policy is relevant to promoting equal opportunities. It delivers all aspects of HR Administration/Payroll/Pensions/ Training & Development to Harrow Council London employees and associated employers.

Sources of Evidence

Consultation with stakeholders. Annual performance reports. Client feedback. Quarterly staff seminars.

Results of Impact Assessment / Monitoring / Consultation

The processes outlined above provide adequate assessment of service and would highlight any areas of discrimination.

Conclusions

No evidence has been identified to indicating discrimination in the provision of the Lifecycle Management service.

Proposed Action

Continue to monitor on an annual basis.

Department: Organisational Development

Function/Policy: HR & OE Departmental Guidance and Advice

Introduction

The function aims:

To provide effective support to elected members and managers to lead and manage effectively

To search for talent outside and develop talent within to build capacity To make the best use of people through efficient and effective

It serves an important role in managing equalities by ensuring management decisions based on objective information and take account of equalities implications and best practice

Sources of Evidence

Statistics for applicant monitoring

Statistics for employee relations analysis

Statistics for workforce profile

Feedback from staff, Harrow Council Black Workers Group,

Employees with Disabilities Group, Trade Unions

Case Management system

Regular meetings and consultation on individual issues with: the trade unions, Community groups, such as HCRE and HAD and employee support groups. The service also takes on board feedback from Directors & Executive Directors and Managers and service users.

Results of Impact Assessment / Monitoring / Consultation

Overall no adverse impact identified however unable to establish whether recruitment and selection policy being adhered to.

Conclusions

Further work required as detailed below

Proposed Action

A working group was set up to review the differential impact of the recruitment process and an action plan is being implemented which will improve adherence to the policy and practices of the recruitment process. The Recruitment and Selection Policy is also currently being reviewed. Apply monitoring arrangements on an annual basis. Raise awareness of services provided through publicising HR Consultancy

Department: Organisational Development

Function/Policy: Corporate Policy Development

Introduction

Corporate Policy Development aims to make the best use of people through efficient and effective management. In addition it should demonstrate best practice to the community and lead and promote equality in employment.

By engaging minority groups in the development of corporate policies the Council is demonstrating its commitment to eliminate unlawful discrimination, promoting equal opportunities and promoting good relations between people from different racial groups.

The Council also demonstrates best practice by engaging stakeholders in the development of policies, which will assist in promoting Harrow as an Employer of Choice.

Sources of Evidence

Yearly Equality/Applicant monitoring report including monitoring information from impact assessments of key policies eg grievance, harassment, disciplinary cases.

Staff Survey

Feedback from Trade Unions, Employee Support Groups including HCBWG, Managers and HR Consultants.

Feedback from HCRE, HAD, Asian Applicants Review Group, etc on draft policies

Consultation with Community groups is targeted according to the relevance of the particular policy under review/development. Consultation is usually by letter, meeting or over telephone either before or after a draft document has been developed.

Employee Support Groups are consulted via letter, meetings, by telephone, etc. to gauge the views of their members in relation to policies under review/development, either before or after a draft document has been developed.

Results of Impact Assessment / Monitoring / Consultation

Groups consulted on individual policies have raised concerns about the impact of various policies on different groups.

It is apparent from monitoring information that our current recruitment and selection process results in a disproportionate success rate for BME groups. The impact is potentially discriminatory, though there is no evidence of direct discrimination and research has been unable to determine any indirect discriminatory practices.

Conclusions

Further work required as detailed below

Proposed Action

Ensure that consultation arrangements for all policy development are fully inclusive – to be implemented 2005/06.

Department: Organisational Development

Function/Policy: Training and Development

Introduction

Key priority 1 of the Council's Strategy for People is to find and develop the right people with the right skills. The Council aims to do this through embedding learning and development opportunities as well as through other processes. The Council has committed to develop and implement a learning and development strategy for employees and elected members. This strategy will provide maximum access to, and equality of opportunity for learning and development opportunities for informal and formal learning.

The strategy needs to:

- Increase the degree to which the Council's workforce reflects the community is serves at all levels of the organisation
- Provide positive action where specific groups are significantly under-represented
- Ensure staff treat each other with respect and understand and work to meet the needs of a diverse community
- Ensure equality and diversity are mainstreamed in all learning and development activity
- Increase access to development for groups who have had little access to formal learning in the past

Sources of Evidence

Staff survey in 2003/4 - 52% returned the questionnaire Training data base

The Strategy for People in which the Training Strategy was a key component was consulted on widely including HCRE, Harrow Council black workers group through distribution of draft documents and consultative workshops

Results of Impact Assessment / Monitoring / Consultation No adverse impact has been identified to date.

Conclusions

Training applications will be monitored more accurately in 2005-06 with the further development of the data base. The staff survey, and Investors in People assessment will also monitor any adverse impact of the strategy as it develops

Proposed Action

The HCU and IPAD project plans involve detailed consultation throughout their development in order to ensure that adverse impact is prevented from the outset. Project plans can be made available if required

Department: Organisational Performance

Function/Policy: Performance Team (Formerly Best Value)

Introduction

The Performance Team is responsible for a number of areas across the Council:

- Strategic Performance Reporting
- Performance Management infrastructure
- Best Value programme
- CPA inspection coordination
- Inspection support
- New MIS systems

Sources of Evidence

The key evidence used to support the assessment lies in:

- Strategic performance report
- Best value toolkit
- Continuous improvement process
- Mori process
- Staff surveys
- Vitality profiles

Results of Impact Assessment / Monitoring / Consultation

No evidence of a differential impact was discovered, however the team will continue to monitor performance in this area through a number of mechanisms:

- Development of an equality scorecard for the Council as a whole
- Future development of the Best Value review process
- Reporting through the Strategic Performance Report
- Assessment of Area level performance

Conclusions

The team has an impact on the Council's performance on Equality through its performance reporting and analysis role. No evidence has been found of a differential impact however it is critical to continue to build the right monitoring mechanisms as outlined above.

Proposed Action

The critical actions going forward are:

- Develop a Council wide equality scorecard
- Build a new continuous improvement process
- Continue delivery of the strategic performance report

Department: Organisational Development

Function/Policy: Occupational Health Service

Introduction

The function aims to:

To provide a medical and advisory service to the Council, and a medical advice, support and counselling service for employees

It serves an important role in managing equalities by ensuring management decisions based on objective information and take account of equalities implications and best practice

Sources of Evidence

Data currently available is not broken down by ethnicity, gender, etc and is therefore unable to establish whether the function has a differential impact.

Results of Impact Assessment / Monitoring / Consultation Unable to establish whether the function has a differential impact.

Conclusions

Further work required as detailed below

Proposed Action

Establish with service provider system for recording of information on usage.

Develop procedure for analysing information.

Department: People First

Function/Policy: Physical Disability and Sensory Services.

Introduction

Function examined is specifically to (a) Improve accessibility of information distributed to service users and (b) Promote Direct Payments to offer flexibility and choice to service users.

Promoting and increasing the take up of Direct Payments within ethnic minority groups will increase the service user's choice and also provide them with an opportunity to organise carers familiar with their language, cultural needs – diet and lifestyle etc.

Sources of Evidence

Feedback from Service users during assessment or forum meetings, consultation via User Survey forms, contact from Groups and Organisations representing minority groups.

Results of Impact Assessment/ Monitoring/ Consultation Service users have stated that they wish to have carers with an understanding of their cultural needs.

Conclusions

Commissioning care via a select accredited agencies had an negative impact on service provision as it became clear most agencies had difficulties recruiting carers who spoke various languages Therefore Direct Payments were promoted within the Ethnic minority service users to rectify this situation

Proposed Action

Once the new information booklet has been distributed, feedback will be encouraged from individuals and any necessary changes will be made. This will determine whether that any adverse impact will have been eliminated, as accessibility is the goal.

Monitoring of take up will be analysed and reported to the Steering group. The Direct Payments Co-ordinator will promote this scheme by contacting various representative groups and this will promote good relations within the community as well as increase awareness of cultural issues.

Department: People First Mental Health

Function/Policy: East Sector CMHT Operational Policy

Introduction

This policy defines the operation of the service delivered to adults with mental health problems living in the East Sector of Harrow. The service actively promotes equality of access to all minority groups and seeks to break down barriers to this. Issues of insufficient access to interpreters and of inadequate information being produced in community languages have been raised in the process of the Impact Assessment

Sources of Evidence

Use of ethnic monitoring information and extensive consultation with users from all backgrounds have been the methods used to gather evidence

Results of Impact Assessment / Monitoring / Consultation

The EIA has highlighted that users of mental health services would like more extensive use of interpreters in all aspects of their contact with the service and are also seeking more comprehensive information about services in a number of community languages.

An action plan is currently being drawn up to address these issues to be delivered by July 2005. The policy will be amended to reflect this

Conclusions

The EAI has informed the production of an action plan which will seek to address the difficulties identified and which will be published in July 2005. Further consultation and feedback to the user group will take place at the next user forum planned for September 2005.

Proposed Action

The action plan is currently being drawn up as above. Outcomes to be circulated to Harrow User Group and all stakeholders

Department: People First

Function/Policy: Children's Services Achievement and Inclusion

Introduction

Legislation places on schools the duty to eliminate unlawful discrimination and promote equality of opportunity and good relationships. These apply both to exclusion procedures and attendance arrangements

The Local Authority provides guidance to schools regarding exclusion procedures. It also provides additional targeted funding which schools can use to put in place support to avert behaviour which might lead to exclusion. It also provides, in-service training and limited advisory teacher support to tackle behaviour concerns.

Sources of Evidence

Monitoring arrangements requiring schools to report all fixed term exclusions (1 day and over) as well as permanent exclusions, categorising the reason for the exclusion and identifying ethnic group. Schools' registers of attendance. Full consultation across schools and governing bodies regarding Local Authority Policy and Guidance on Exclusions and Attendance

Results of Impact Assessment / Monitoring / Consultation

With regard to exclusion from school, analysis of data show that some ethnic minority groups and other groups are over-represented and some ethnic minority groups and other groups are under-represented.

Conclusions

There is no evidence that this is as a result of directly or indirectly discriminatory or unlawful actions

There is no comparable data for attendance on which to base secure judgements.

Proposed Action

A significant in-service training programme has been put in place to support teachers and schools develop and strengthen behaviour management strategies. Additionally a rapid response multi-agency team has been available to support high schools identify alternatives to exclusion during 2004/5. These will continue and developed further in the coming year.

An action plan is to be drawn up in Summer 2005 to be implemented from September 2005 and is expected to incorporate a 2 year plan.

R & I and the Education Social Work Service will be developing attendance monitoring arrangements to include minority groups. Already ESW service has developed a leaflet, published and available in minority languages, to emphasise the importance of not taking holidays and avoiding visits in term time. Arrangements have been made with a number of local travel agents to offer travel discounts during the school holiday period. The impact of this will be monitored in the coming year.

Department: Early Years, Childcare and Parenting Services

Function/Policy: To improve access to Early Years and childcare provision for BME children and families

Introduction

Harrow Early Years, Childcare and Parenting Services works to:

- To enable families to have access to high quality affordable childcare for children aged birth to 16
- To provide children with the highest quality care and learning
- To provide practitioners with access to qualifications training and continuing professional development opportunities

The Early Years, Childcare and Parenting Services works to a 2 year strategic plan. The plan was until 2004 a statutory plan agreed by elected members. The plan contains 14 key targets including 2 Best Value Performance Indicators.

The service has been working to improve the access to services, particularly early years provision by Harrows BME communities.

Sources of Evidence

Collection of data is undertaken in a number of ways to provide evidence of progress towards meeting the objectives including:

- Termly data via the Harrow People First Finance team (3 Year olds accessing education)
- Termly reports from the Harrow Ethnic Minority Achievement Service
- Questionnaires to parents
- Survey of providers this is done annually for the Dfes and annually for internal purposes to gauge the number of staff employed in leadership positions from BME groups

Results of Impact Assessment/ Monitoring/ Consultation

Specific view of parents have been sought with regards their views on early education for their children.

Conclusions

The specific research carried out on how parents view early education and childhood led the service to undertake specific pieces of work with Harrow's Ethnic Minority Achievement Service which aims to increase the understanding and importance of early play in children's learning. Support materials have also been produced to support this ongoing work

Proposed Action

- Specific training for practitioners around quality inclusive practice in early years and childcare provision
- Continuation of the service level agreement with EMAS to expand further work that they have done
- Creation of translated assessment statements to ensure that parents and carers from BME groups have the opportunity to contribute to the assessment process
- Undertaking further specific detailed work with finance to record the take up of provision by BME families

Department: Children's Services

Function/Policy: Special educational needs and disabilities

Introduction

The function/policy covers arrangements for children and young people with special educational needs and disabilities within the framework of the Education Act 1996, the Special Educational Needs Code of Practice 2001, the special educational needs provisions of the Special Educational Needs and Disability Act 2001 and related guidance and the Children Act 1989. The specific services include the SEN Assessment and Review Service, Educational Psychology Service, Sensory and Communication Team and Children with Disabilities Service.

Sources of Evidence

Pupil Level Annual School Census (PLASC) 2005 and the national statistics on special educational needs in England, Department for Education and Skills. January 2004 that is based on the Annual School Census and the SEN2 survey.

Results of Impact Assessment/ Monitoring/ Consultation

An analysis of children and young people with special educational needs and disabilities by ethnicity has been carried out in relation to special educational needs status, ie School Action, School Action Plus and statement of special educational needs and attendance at Harrow special schools and the data compared to the overall data for Harrow pupils. Across most ethnic groups there are only relatively small variations between those with special needs or attending special schools and the overall population figures. Children and young people whose ethnic origin is Indian appear to be under-represented across all the indicators analysed which is consistent with the higher levels of achievement of this group. White British children are more likely to have a special needs statement which again may reflect the relatively low achievement in this group particularly boys.

Consultation on the special educational needs strategy was carried out in 2002 with a wide range of partners and the community through school governing bodies. A more recent consultation has been conducted in autumn 2004 on changes to the funding arrangements for children and young people with special needs statements that involved a questionnaire available in community languages and telephone interviews and focus groups with interpreters where necessary.

Conclusions

Across most ethnic groups there are only relatively small variations between those with special needs or attending special schools and the overall population figures.

Proposed Action

There is a need to look in more depth and detail at some elements of activity in relation to special educational needs and in particular an analysis of appeals to the national Special Educational Needs and Disability Tribunal by ethnicity will be included as part of the monitoring that takes in this area.

Further systems need to be developed and established with regard to the care arrangements made for children and young people with special educational needs and disabilities and this will be part of future developments within the social care service for children with disabilities.

Department: People First

Function/Policy: Harrow Teachers' Centre

Introduction

Harrow Teachers centre is a service used by internal and external customers. It is a venue where training courses, events and conferences take place. Council policies are adhered to in supporting and marketing the venue.

Sources of Evidence

The booking system provides insufficient data on usage by specific communities.

Loss of custom, change in users data

Complaints

User feedback and consultations

A new booking system has been purchased that allows managers to analyse data about type of usage and user groups more systematically.

User comments were incorporated in new policy development for Education Lettings.

Results of Impact Assessment/ Monitoring/ Consultation

No evidence of adverse impact

Conclusions

Incorporate equality policies for HTC in Lifelong Learning to ensure relevance to range of services being provided

Proposed Action

Looking at provision of space for prayers.

Review range of catering options for users

Ensure policies are visible.

Carry out analysis of usage and users as data becomes available through new booking system.

Review range of options and services provided

Department: Learning and Community Development

Function/Policy: Libraries

Introduction

The library service has 60,000 voluntary <u>active</u>* borrowers, 48.6% of whom are from BME groups. Apart from provision of appropriate stock and information services relevant to different racial groups and culture, the service acts as a window on other cultures' literary and recorded music traditions for the whole community. It aims to provide access to literature, information (inc. community information), informal lifelong learning opportunities, recreational reading and listening, and a major resource for local history. These are for all people who live, study or work in Harrow

Sources of Evidence

The main source of data is the voluntary monitoring of ethnicity at the time of registering library membership to borrow library stock. In addition, the triennial Public Library Users Survey (PLUS) monitors ethnicity of the survey sample at each library. Comments from Feedback forms are monitored.

Results of Impact Assessment / Monitoring / Consultation

The evidence of use suggests that there is general satisfaction with the service. The main issues are how to provide for small and/or scattered language groups not having access to materials of interest in their languages.

Conclusions

Issues can be addressed through continuous improvement of the range and locations of stock of interest to minority racial groups by responding to changes in community group sizes and locations, monitoring existing use of BME interest stock, and responding positively to public guidance on areas of interest and titles of interest. Stock here refers to books, recordings, electronic information sources, etc.

Proposed Action

This is a continuous programme embedded in the culture of the library service. An action plan is available as part of the full equality impact assessment covering the wider equalities areas.

Department: Learning and Community Development

Function/Policy: Community and Culture

Introduction

The objectives of Community and Culture are:

- Strategic arts development throughout the Borough
- Monitoring and evaluation of arts services delivered through the Arts Culture Harrow Service Level Agreement
- Development, delivery and monitoring of the Cultural Strategy
- Provide high quality music education in Harrow Schools
- Widening access and providing instrumental tuition and performance opportunities

Sources of Evidence

The Music Service provide and have access to Pupil Data in conjunction with the DfES Survey (every 2 years). This data describes ethnicity, gender, age etc.

This data is used to set targets for improving access to music services and provides information on how access to music provision In Harrow compared with other authorities.

Monitoring of the Music Service is also carried out by management through an agreed programme of regular visits to schools.

Individual projects/initiatives organised/ facilitated by Community and Culture are monitored and impacts measured.

One example where monitoring has been undertaken is - *Words Live 2005* 24 events with 26 Artists (8 Black /8 Asian/8 White/2 Other) reaching 1,186 people

(Ethnic Breakdown – 21.92% Black/ 30.86% Asian 32.04% Other 15.17%). Around 60% of these were women and 35% youth

Results of Impact Assessment / Monitoring / Consultation

Arts4Schools

- There are concerns regarding the take up of certain instruments by gender (eg low numbers of boys playing flute; low numbers of girls playing trumpet).
- We are also concerned that more children from different ethnic backgrounds aren't taking the opportunities given, to experience music from other cultures

Arts Unit

There has been no specific activity for Refugees planned for last year One 2-day activity and research project planned for Disabled people in last year. No record of monitoring take-up in terms of equality of opportunity except for literature and within this, records of racial groupings have been too general (ie Black/Asian). Need to improve.

Conclusions

Community and Culture is a newly formed division.

It is recognised that improvements are needed in relation to the relevant collection of assessment data and case study material.

The refresh of the Cultural Strategy and formulation of a Community and Culture Service Plan creates the opportunity to put these systems in place.

Proposed Action

IMPROVEMENT PLAN

ISSUE IDENTIFIED	ACTION REQUIRED	LEAD OFFICER	TIMESCALE	COMMENTS
General Focus of Community and Culture's Services	Review of Cultural Strategy	S.Webster	June – December 05	
Ensure a greater understanding of our audience and participation levels	Establish system to collect and analyse data (participation and satisfaction levels etc)	S.Webster	Sept 05	Part of new planning cycle
To set realistic and inclusive targets for the reach of C&C services across Harrow communities	To set targets for achievement as part of the planning process	S Webster	Sept 05	Part of new planning cycle
Ensure effective consultation with the community on new initiatives	Build and learn lessons from pilot consultation work started with Under One Sky	S Porter	Ongoing	
Ensure programme of events and festivals reflects as	Review programme of 2005 events and plan for 2006	S Webster	Sept-Dec 05	New programme produced for

is relevant to the needs of Harrow communities				2006
Lack of consultation with parents/pupils	Determine method of consultation	M. Blake	Sept 2005 -	Music service is a trading service with schools but needs to consult more widely on effectiveness
More rigorous approach needed to monitor music service	Review the process for 'Best Value' pilot carried out in the year 2000	M.Blake	Sept 2005 -	As part of service development plan 2005-2006
Widening opportunities	Extend 'wider opportunities' to include more schools	M.Blake	Sept 2005 -	As part of service development plan 2005-2006

Department: Asylum Service

Function/Policy: Integration Strategy for unaccompanied asylum seeking children (UASC)

Introduction

The Asylum Service aims to meet the integration needs of our unaccompanied asylum-seeking children though joined up service delivery.

Ensuring that the housing, housing, education and social care support aspect of the service users are met through the integration strategy.

Particular attention will be paid to addressing the specific needs of Unaccompanied Asylum Seekers through extending partnerships with specialist care service providers

Sources of Evidence

The main sources of evidence are derived from membership of various forums, client consultation with assistance from the following:

- Other Council Departments
- USAC forums
- People First; Social Care Asylum Service Business Plan
- Black and Minority Ethnic Housing Reference Group
- Schools and Colleges
- Connexions, London West
- Harrow Primary Care Trust

Results of Impact Assessment/ Monitoring/ Consultation

The main sources of evidence are derived from membership of various forums and client consultation Information obtained from the data sources above has been analysed and has confirmed that a need is apparent and the mechanisms in place. This has provided evidence of positive outcomes, in the areas of the education, health and mental well-being of this specific client group, however one area requires a specific action that being health and sex education needs of UASC.

The current arrangements with regard to mental health service provision currently in place do not fully meet the needs of these clients, the consultation process currently taking place in Harrow will result in effectively and efficient improvements.

Conclusions

The methods devised which have been developed from the consultation process are robust in the defined objectives, the specific issue areas have been identified and we know have a clear way forward to resolve them through multi-agency partnership and service user consultation

Proposed Action

Ensure that the above strategy as laid out in this document is achieved and monitored to improve the quality of service provision to the UASC clients in order to meet the specific needs identified

Extend the scope of the USAC forums in order to bring the recruitment and training of staff within the Asylum Service in compliance with the objectives set out in the Harrow Council Race Equality Scheme.

When fully operational will be capable of providing a cultural and ethnic awareness of the client group

Department: Urban Living

Function/Policy: Crime Reduction Unit

Introduction

The Council's Crime Reduction Unit is responsible for supporting the strategic planning requirements of the Crime and Disorder Act 1998 and other legislation e.g. Anti-Social Behaviour Act and Domestic Violence Act, plus service responsibilities e.g. ASB Unit.

The 3 main areas of service delivery are:

- Coordination and delivery of the Crime and Disorder Reduction Strategy, Performance Management, Evaluation, Training and Funding, including mainstreaming of community safety required by s17 Crime and Disorder Act 1998
- ii) Development and Management of crime/drugs shared information database, information sharing protocol development, analysis.
- iii) Management of the multi-agency response to Anti-Social Behaviour in accordance with the ASB strategy and protocol

Sources of Evidence

The evidence base comprises the 2004 Crime and Drugs Audit and recently published Crime and Drugs Strategy 2005-2008.

The s17 Mainstreaming toolkit has been based upon the consultation and good practice derived from the NHP South Harrow Pilot.

An adverse impact may occur where a disproportionate response is taken against a minority group, for example. This can sometimes occur where the public perception is that a certain group is responsible for a problem.

The concern is that young people are seen to be the cause of crime and anti-social behaviour when statistically they are likely to be the victim. Considerable effort is being undertaken through the Crime and Drugs Strategy to address prejudiced views and false perceptions of young people. For example, young people within certain ethnic groups e.g. travellers and Somali groups are often associated with ASB and Crime.

Results of Impact Assessment / Monitoring / Consultation

The Safer Harrow Management Group (C&DRP). have a remit to ensure that the response to Crime

and ASB is both proportionate and non-discriminatory. The Crime, Disorder and Drugs Reduction Strategy and the ASB Strategy are reviewed periodically by the Safer Harrow Management Group crime/drugs audit project group and problem solving groups.

The s17 mainstreaming responsibility will be driven and monitored by the CSMS Service Plans and the Safer Harrow Management Group

Crime is underreported generally, however in particular areas this is more acute.

for example racial incidents, domestic violence, youth crime. The Safer Harrow

Partnership is determined to address this through the further development and implementation of third party reporting systems, case management systems e.g.

Caseworks and the mainstreaming of community safety across Council Directorates.

Significant work is being undertaken to address this, for example working with traveller families in the Chandos area of Harrow, including the funding of youth crime diversion projects and consultation with groups of youths affected by the youth dispersal order at Wealdstone.

Conclusions

Although a significant amount of work has been undertaken to identify and address any adverse impact, funding is a continuing issue re support for translation services. We will press the Council to make this a corporate priority, our case highlighting the impact should the service not be accessible to all, and the opportunities to be lost in communicating messages and involving ethnic groups in the community safety plans and services.

The Council has been slow to implement community safety across all Directorates as part of policy and practice. This will have an impact on the level and quality of service provided to groups at risk of becoming victims of crime, particularly young people, women and ethnic minorities.

Proposed Action

The Safer Harrow Partnership is promoting the strategy and action plans in a variety of accessible way including hard copy information, internet and intranet, community trailer at local events and a community television programme to be implemented this year. Documents are translated into the languages of all main ethnic groups in Harrow and translation services made available to all.

Third party reporting schemes are being developed following successful implementation in respect of hate crime. There is scope to extend the initiative to reports of crime by young people, domestic violence, honour crimes and forced marriage issues.

The s17 toolkit development should ensure that the Council is complying with the legislation ie preventing crime and ASB and providing services to victims and offenders. The Council's CPA rating will be strongly influenced by its commitment to S17. Progress is being regularly reported via the Community Safety Maintenance Services plan and parallel reporting to the Safer Harrow Management Group.

Department: Urban Living

Function/Policy: Planning – Unitary Development Plan (UDP) and

Research

Introduction

The UDP provides the current statutory development plan framework for the borough, and the research function provides monitoring and information support for the development plan. Over the next three years the UDP will be progressively replaced by the new development plan system known as the Local Development Framework.

Sources of Evidence

The annual monitoring report on the preparation of the Local Development Framework and the performance of the UDP will be presented to Strategic Planning Advisory Panel and Cabinet in November/December 2005

Results of Impact Assessment / Monitoring / Consultation

Pending completion of the annual monitoring report

Conclusions

Await outcome of annual monitoring report

Proposed Action

None required at this stage

Department: Urban Living

Function/Policy: Public Realm & Waste Management

Introduction

The Public Realm & Waste function -:

- Works in partnership to improve 'liveability', including the reduction of crime and anti-social behaviour.
- Improves access to services for the increasingly diverse community.
- Collects waste and recyclable waste from households, commercial premises and recycling collection centres.
- Transfers residual waste to the West London Waste Authority for disposal, and recyclable and compostable materials to reprocessors
- Maintains and clean streets, parks and countryside, increasingly through "strategic area working" by multi-skilled teams.
- Keeps our highways usable through gritting, snow removal and emergency maintenance.
- Provides cemetery and crematorium services.
- Ensures pro-active liaison and consultation with community and partners

Sources of Evidence

- Monitoring of service delivery levels
- Ethnic monitoring of new tenant lettings on allotments.
- Annual monitoring of ethnic makeup of sport clubs
- MORI customer satisfaction survey 2002
- European Foundation for Quality Management methodology
- Partner consultation on development and management issues.

Results of Impact Assessment / Monitoring / Consultation

• Current evidence does not identify any adverse impact on ethnic groups.

Conclusions

- Whilst there is no evidence of any adverse impact the partners and groups involved with consultations are not fully representative of the community nor do they take the needs of under representative groups into account.
- The MORI customer satisfaction survey of 2002 whilst providing guidelines is now out of date and covers a relatively low sample size.
- The Waste communication strategy demonstrates good practice and further development to encompass the full range of Public Realm activities is indicated.
- Collation of data through the computerised first contact system needs expansion to facilitate detailed analysis of any trends.

Proposed Action

- Further develop a Communication Strategy where all consultations include for ethnic monitoring information.
- Develop and incorporate the necessary changes into the 2006/07 Service Plan from results of the ethnic monitoring data collated through the computerised first contact system.

Department: Urban Living

Function/Policy: Special Needs Transport

Introduction

To support People First Executive Directorate (Community Care, Children Services and Learning and Community Development by Providing Home to School and Home to Day Centre Transport for Children and Adults with Special Needs

To provide safe, efficient. Cost effective services within the expected levels of defined quality.

Sources of Evidence

The Special Needs Transport Service is available to all groups and therefore will comply within the Equality Scheme. People First Directorate agrees the eligibility to the service and the needs of the passengers are assessed prior to commencement of transport.

We do not have statistics in relation to % of Service users in minority groups – However again this service is specifically open to all resident throughout Harrow who have a Special Need.

Results of Impact Assessment / Monitoring / Consultation

We have identified a need for staff that are able to speak languages other than English on our Asian Day Centre Routes and this is where possible actioned.

We have identified a need for Staff who is able to communicate with children and adults with hearing impairments. I.e. BSL signer. Recruitment and Selection process started in April and a second advert is expected in June 2005

Conclusions

This service is currently undergoing a complete review and managers from People First and Urban Living have contributed to a wide-ranging report. The review has looked at all aspects of the service including eligibility into the scheme. Marilyn Vertes, Community Care Dev Manager, People First is the author of the review.

Proposed Action

Awaiting outcome of review.

Race & Gender – Reviewing routes to ensure where possible the crew consists of male/female and where we have Asian Day Centres that at least one member of staff is able to speak another language. Within 6 months

Disability – By advertising for escorts who are able to sign BSL – Within 6 months

Training in Disability Awareness

Travellers Awareness Course

Department: Urban Living

Function/Policy: Catering Service

Introduction

Provision of catering service to pupils entitled to free school meals, Meals on Wheels Clients, Residential Homes, Day Centres and Luncheon Clubs. Also staff restaurant and function catering on request.

Many different ethnic minority groups have specialised catering requirements, which need to meet in full.

Sources of Evidence

Annual customer reviews, group meetings with Day Centres, Schools and Dietitians.

Harrow has its own fully equipped Asian kitchen (Milap) which produces Vegetarian Asian Meals, produced from fresh ingredients. After consultation with clients, Social Services and Councillors the fresh meal product was preferred to any frozen substitute. In addition there is a pre-packaged frozen MOW service which is delivered fortnightly to service users, meeting all diverse requirements.

Results of Impact Assessment / Monitoring / Consultation

We have historically identified a need for staff that need to be able to speak languages other than English on our Asian Meals on Wheels Service.

The services we provide do not have an impact adversely on our service users. We are providers of catering services that have achieved 100% delivery of service across all areas of diversity.

Conclusions

Any minority group/person requesting special dietary requirements will be offered a suitable meal choice.

Proposed Action

No further action is required at the moment but there may be a need to review the Asian MOW requirements if the number of clients requiring this service continue to increase. This could lead to higher costs and therefore budget implications to both the Council and clients.

To continue to source products and meals to meet the changing needs of the local community in Harrow.

To continue to develop a customer-focussed department, that reflects the needs of the community at a local level.

Department: Urban Living

Function/Policy: Food Service

Introduction

The Food Safety service has 5 main themes:

- Regulation of the sale and supply of food and feeding stuffs in the borough including the inspection of premises to determine compliance with legislative standards.
- The sampling of foods for compositional and microbiological analysis.
 Follow-up of samples with businesses following reports by the Public
 Analyst or Health Protection Agency's Food Laboratory.
- 3. Maintenance of public health though the investigation of cases of food poisoning and infectious disease. Contact tracing and exclusion of persons preparing food or those responsible for the care of the young or of vulnerable clients. Related sampling.
- 4. Advice to the public and business on safe food preparation and legal requirements. Promotion of food safety and awareness raising. Action on food hazards notified by the Food Standards Agency.
- 5. Provision of foundation training in food hygiene as a service for local business, local authority employees, charities and those on benefits.

The provision of these service themes is subject to procedures that cover the planning and delivery of the service. The Framework Agreement and related enforcement policy and service plans are statutory requirements in specified formats determined by the Food Standards Agency for all food authorities. These statutory arrangements determine the functions and the policies of the authority.

Sources of Evidence

Compliance with the Framework Agreement is monitored on a regular basis by the Food Standards Agency; the annual Food Service plan is reported to members and approved by Cabinet. Compliance with the service plan and deviations from the Agreement and code of practice are reported in the Food Service plan. There is national benchmarking of certain inspection data through Best Value performance indicators.

Training to support existing officer competency standards and those opportunities as part of the Harrow Corporate University curriculum to be driven and monitored by the CSMS Service Plan alongside statutory reporting arrangements to Cabinet and Food Standards Agency.

Results of Impact Assessment / Monitoring / Consultation

On the basis of the evidence there is no adverse impact. However there is always a potential risk that adverse impacts may arise where actions are taken that are not proportionate, transparent or appropriately targeted in accordance with the Council's adoption of the Enforcement Concordat and enforcement policies. In the event of any deviations from enforcement policies, in accordance with the Framework Agreement, there is a statutory requirement for these to be measured and documented in the service plans.

Formal systems have been put in place, recorded in our quality manual, to ensure that all formal enforcement and prosecution decision-making processes are subject to formal review and agreement prior to implementation. This provides a process to ensure compliance with the concordat and enforcement policies and issues such as proportionality etc.

Conclusions

Feedback on services is positive with good levels of customer satisfaction. This may in part be a reflection on the services provided and in part due to the developments already achieved.

A number of fundamental controls are maintained in order to promote services and to minimise risk. Systems are in place to ensure that the actions taken and services delivered are proportionate and consistent which provides an adequate level of control over these elements.

Proposed Action

As a result of officer review, a number of fundamental controls identified must be actively maintained in order to promote services and to continue to minimise risk:

- Continued general conformance with the Framework Agreement, code of practice, policies and Enforcement Concordat.
- Maintenance of the inspection programme for food premises in line with statutory guidance.
- Maintaining the existing enforcement practices in accordance with procedures to mitigate the potential adverse impacts where actions are taken that are not proportionate, transparent or appropriately targeted in accordance with the Council's adoption of the Enforcement Concordat and enforcement policies. In particular to continue the appropriate and consistent use of the Formal Action approval form prior to prosecution or formal caution of an individual or business.
- Maintenance of officer training and statutory competency standards for inspectors to minimise the risk of adverse impact.
- Monitoring of officer work through data returns, management information systems, complaints and case reviews.
- Seeking opportunities for the development and improvement of risk controls through the ICT changes.

Department: Urban Living

Function/Policy: Enabling

Introduction

Enabling is a function within Urban Living that's aim is to maximise the amount of affordable housing within Harrow.

Sources of Evidence

Monitoring

Data sources, details & results of monitoring, making clear where there is evidence of discrimination, and how the results are to be used to develop future policy and practice.

We have an agreed BME RSL policy, which enables BME RSLs to be actively involved in providing new affordable homes in Harrow. This was introduced following consultation with the BME RSLs and following good practice produced by the Housing Corporation.

Currently reviewing policy in relation to BME RSLs- Meeting arranged July 2005

Ethnicity breakdown of those people seeking affordable housing

Ethnicity breakdown of who the housing is given to- This includes how BME RSL's are involved in developing affordable housing and the number of units they own or manage

Consultation

This is all done through the RSL's who consult with their tenant and community groups. We consult direct with RSLs on our policies, specifically including BME RSLs. We also seek views of specific interest groups through wider forums such as the BME Housing Reference Group.

When developing specific projects- we would consult with prospective occupiers through housing provider that is developing the housing (the Council does not develop housing itself but enables housing associations to do this).

Results of Impact Assessment / Monitoring / Consultation

Impact Assessment

The result of impact assessment concluded that there where no adverse impact on ethnic groups.

However ongoing monitoring and consultation with housing providers will identify the need for any new initiatives and markets techniques to meet specific needs.

Conclusions

If we do not have the provision to build and supply affordable housing, then there are less opportunities for people who can not afford market housing to meet their housing needs. This can differentially affect those people who have average lower incomes or need larger homes. People from BME communities, people with physical disabilities and lone parents are more likely to be in this position.

Proposed Action

Our proposed action plan reflects our awareness to continue monitoring and reviewing our function in Enabling, to ensure that no Inequality arises. Below are our proposed actions:

- Service Plans- BME RSL's- Ensure that BME RSL's are engaged in delivering new housing in accordance to policy targets
- Key Worker Strategy- Action plan: monitor applicant ethnicity data and identify the need for any new initiatives and markets techniques to meet specific needs.
- Inline with the action plan from the BME Housing Strategy- Production of design guideline 2005/2006- This will take into consideration the needs of different groups in the design of new housing- disability, faith needs etc
- Work with RSL's to maximise the provision of lager housing (permanent and temporary accommodation)
- Work in partnership with BME RSLs to identify best practice in service provision to BME residents and encourage all social housing providers to meet these standards.
- Monitoring take-up of low cost home ownership schemes

Department: Urban Living

Function/Policy: Engineering Services

Introduction

The Engineering Services Unit is responsible for the maintenance of the Borough's infrastructure, undertaking a wide variety of civil and structural engineering projects as consultants. The function is almost exclusively associated with the management and maintenance of physical assets - highways, structures and drainage. Much of it is statutory in nature. The objective of the service is to ensure that engineering solutions are delivered to meet local and strategic objectives and priorities which are undertaken within a statutory legislative framework.

Sources of Evidence

We take steps to mitigate the adverse effect of the impact of our works and sources of monitoring information are complied from the corporate complaints system, performance monitoring returns from residents providing details of ethnicity, gender, etc. and occasional scheme-specific consultations, Information on forthcoming works and specific consultations on particular schemes are disseminated to *all* affected parties, irrespective of ethnicity, gender, disability, etc.

Results of Impact Assessment / Monitoring / Consultation

To date, none of this evidence outlined above has provided any indication of discrimination as described.

Conclusions

The Engineering function is largely driven by rational assessment of engineering needs, compliance with legislation, policy and service specification. Whilst ensuring that the delivery of the service is non-discriminatory, the active pursuit of promoting equal opportunities and good relations between people from different racial groups within our customer base is largely outside the scope of the Engineering service.

Proposed Action

Through the Engineering subset of the 2005/06 Urban Living Service Plan relating to social inclusion, we aim to:

- Provide effective customer liaison and support and provide evidence of customer satisfaction levels.
- Provide high standards of equality by continuing to work at local level with all stakeholders to improve access, respond to problems and reduce fear of crime; conducting equality assessments for employment and service'.
- Ensure that all members of the community are included and engaged with to improve the quality of life'.

All of the above are linked to appropriate performance targets

Department: Urban Living

Function/Policy: Transportation

Introduction

There are a higher proportion of ethnic minority pedestrian casualties compared to the overall population. This is a recent observation that has been observed nationally.

None of the other work undertaken by the transportation team has a distinct impact on ethnic minorities.

Sources of Evidence

Accident statistics are collected by Transport for London and are based on police information taken at the time of the accident. Ethnicity of casualties has only been collected since 1995.

Results of Impact Assessment / Monitoring / Consultation

Because Harrow has a particularly low accident rate and high numbers of ethnic minorities, the increase in accidents in ethnic minorities is hard to observe. The borough will continue to monitor this information on an annual basis.

Conclusions

This is not a problem that the borough will be able to solve in isolation. There are numerous speculative reasons as to the reason for this to be happening. Without a fuller understanding as to why this is occurring, the actions that the borough is able to undertake are minimal. However, road safety officers are aware of this problem and will ensure that all new advice in this area is taken on board and implemented as soon as possible.

Proposed Action

The following actions will take place to address this problem:

- 1. Distribution of road safety information in a wider range of languages
- 2. The ethnicity of attendees on cycle training courses is being monitored to ensure diversity of attendees.

Department: Urban Living

Function/Policy: Asset Management

Introduction

The Asset Management function currently comprise of the Building, Premises and Estates services. Their combined role encompasses:-

- Accommodation Works
- Building Maintenance
- DDA Modification Works
- Civic Centre Management
- Rent Review
- New Lettings

Sources of Evidence

Sources of evidence include :-

- Complaints
- Customer satisfaction forms
- Harrow Association for the Disabled access audits
- Contractor equal opportunities policies

Results of Impact Assessment / Monitoring / Consultation

- No evidence of discrimination in relation to the Racial Equalities Scheme has been identified
- With reference to other equalities minority groups, HAD have identified work to be carried out to buildings to continue complying with DDA legislation

Conclusions

- As no evidence of RES discrimination has been identified, efforts will concentrate on expanding consultation arrangements and procedures.
 Continued monitoring will ensure that if future discriminatory issues are highlighted they can be resolved as soon as they arise
- Significant work has been highlighted as necessary to ensure continued compliance with the Disability Discrimination Act. This work should be carried out as soon as practicable

Proposed Action

- Formal monitoring of customer satisfaction forms, complaints and contractors employment policies will be carried out each year and included within the section service plan. Methods of consultation in these areas will be reviewed
- A programme of DDA modification works will be carried out to all of Harrow's buildings with public access with completion of the £1.3M project due for completion in 2007/8

Department: Urban Living

Function/Policy: Strategy – Economic Regeneration Strategy

Introduction

The aims and objectives of the strategy are to enable Harrow Council to become the driving force behind the development and regeneration of the borough, delivering a sustainable and inclusive programme to make a positive difference to individuals, communities and businesses

Sources of Evidence

Census
Vitality Profiles
Dfee
Local Consultations & focus groups
Commissioned Research
Consultation

Results of Impact Assessment / Monitoring / Consultation

Monitoring is incorporated into the development of projects but no adverse impact has been highlighted. Evaluation one year after completion will give a more definitive statement as to impact and justify belief.

Conclusions

On our evidence there has been no adverse impact, however we will continue to undertake reviews to monitor impact.

Proposed Action

To develop the priorities as outlined in the review

To implement a process of reviewing and evaluating the projects developed as
part of the strategy