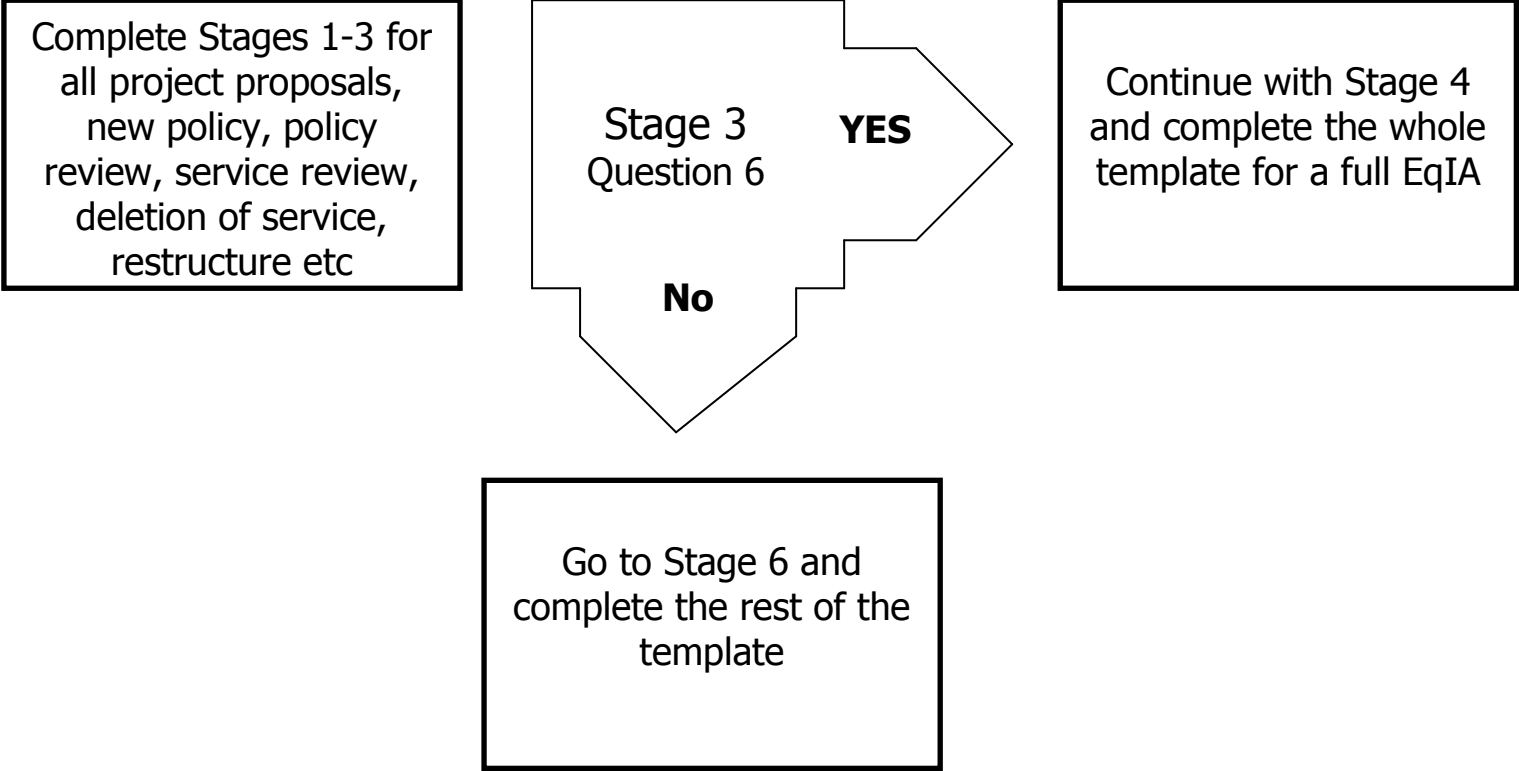


Equality Impact Assessment Template

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



Equality Impact Assessment (EqIA) Template

In order to carry out this assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIAs. Please refer to these to assist you in completing this assessment.

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

Type of Project / Proposal:	Tick	Type of Decision:	Tick
Transformation		Cabinet	
Capital		Portfolio Holder	
Service Plan		Corporate Strategic Board	
Other		Other	
Title of Project:			
Directorate / Service responsible:			
Name and job title of lead officer:			
Name & contact details of the other persons involved in the assessment:			
Date of assessment:			

Stage 1: Overview

<p>1. What are you trying to do?</p> <p>(Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p>	<p>Implement a new Business Rates Retail Relief Scheme as a result of an announcement from central government that support is being made available for local retail businesses. The support provided is through the provision of discretionary rate relief of up to £1000 per financial year to all occupied retail premises that meet with the governments criteria.</p> <p>This additional support has been made available to help retail businesses to respond to the changing way that people shop and is only made available for years 2014-15 and 2015-16.</p> <p>The government are not changing the legislation however making it possible for Local Authorities to implement a new scheme to deliver this support through the Localism Act (under section 47 of the Local Government Finance Act 1988, as amended). The government will reimburse the actual cost of the local share of the</p>
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discretionary relief that falls within the criteria the government have shared with Local Authorities in the Business Rates Retail Relief Guidance. This relief can be awarded to occupied properties that are mainly or wholly being used as shops, restaurants, cafes and drinking establishments with a rateable value of £50,000 or less. Similar to other reliefs a 'test' on use rather than occupation is applied and if it is found the property does not meet the criteria the rate will not be applied. The guidance, attached at Appendix A to the Cabinet Report (pages 5 & 6) gives details on the types of establishments that fall within the criteria of the following:

- i) 'Hereditaments that are being used for the sale of goods to visiting members of the public:
- ii) Hereditaments that are being used for the provision of services to visiting members of the public
- iii) Hereditaments that are being used for the sale of food and/or drink to visiting members of the public

The lists that can be found on pages 5 & 6 of the guidance are meant to provide guidance to Local Authorities and are not exhaustive. However properties that are not similar in use will not be considered for rate relief. The guidance also states the types of uses of business properties that will not be considered for this rate relief which are as follows:

- i) Hereditaments that are being used for the provision of the following services to visiting members of the public:
 - Financial services (e.g. banks, building societies, cash points, bureau de change, payday lenders, betting shops, pawn brokers)
 - Other services (e.g. estate agents, letting agents, employment agencies)
 - Medical services (e.g. vets, dentists, doctors, osteopaths, chiropractors)
 - Professional services (e.g. solicitors, accountants, insurance agents/financial advisers, tutors)
 - Post office sorting office
- ii) Hereditaments that are not reasonably accessible to visiting members of the public

	Harrow Council's proposed scheme aligns with the Governments guidance and is detailed in the draft Business Rates Retail Relief Policy attached to the Cabinet Report at Appendix B.				
2. Who are the main people / Protected Characteristics that may be affected by your proposals? (all that apply)	Residents / Service Users		Partners		Stakeholders
	Staff		Age		Disability
	Gender Reassignment		Marriage and Civil Partnership		Pregnancy and Maternity
	Race		Religion or Belief		Sex
	Sexual Orientation		Other		
3. Is the responsibility shared with another directorate, authority or organisation? If so: <ul style="list-style-type: none"> Who are the partners? Who has the overall responsibility? How have they been involved in the assessment? 	The overall responsibility for taking forward this assessment lies with the Collections and Benefits Division, Resources Directorate.				
Stage 2: Evidence / Data Collation					
4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics. (Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)					
Age (including carers of young/older people)	<p>Harrow profile:</p> <p>Harrow has approximately 5,550 commercial properties of which 5,087 have a rateable value under 50,000 RV, the qualifying threshold for the new retail rate relief.</p> <p>However, not all the 5,087 properties will qualify as the use of the premises must be wholly or mainly for the purposes of a shop, restaurant, café or dinking establishment.</p> <p>It is anticipated a large percentage of the premises in the following categories (under the valuation offices</p>				

	<p>classification) will be eligible for the relief; Restaurants, cafes etc 130 Shops, 2.007</p> <p>The implementation of this scheme will give local businesses additional support to be able to meet with the changing ways that the community shop, particularly in relation to the move to online shopping for the two years of operation of the scheme.</p> <p>The introduction of the scheme may support the on-going presence of local retailers therefore supporting the retention of local facilities for residents of all ages to enjoy and make use of.</p>
Disability (including carers of disabled people)	<p>Harrow profile: 17.3% of Harrow's working age population (16-64) classified themselves as disabled within the 2011-12 period (July to June), a total of 26,600 individuals. This signifies a decrease of 4.6% for the same period in 2010-11. 13,800 (17.3%) are men and 12,900 - (17.7%) are women¹</p> <p>The implementation of this scheme will give local businesses additional support to be able to meet with the changing ways that the community shop, particularly in relation to the move to online shopping for the two years of operation of the scheme.</p> <p>This may support this particular characteristic by ensuring retailers stay in the area therefore ensuring accessibility to the services by people with disabilities.</p>
Gender Reassignment	<p>Harrow profile: This data is currently not available</p> <p>The implementation of this scheme will give local businesses additional support to be able to meet with the changing ways that the community shop, particularly in relation to the move to online shopping for the two years of operation of the scheme.</p>
Marriage / Civil Partnership	<p>Harrow Profile: Since their inception there have been a total of 121 civil ceremonies in Harrow. There is no further data available on marriages.</p> <p>The implementation of this scheme will give local businesses additional support to be able to meet with the changing ways that the community shop, particularly in relation to the move to online shopping for the</p>

¹ Source: Nomis: Annual Population Survey

	two years of operation of the scheme.
Pregnancy and Maternity	<p>Harrow Profile: This data is currently not available</p> <p>The implementation of this scheme will give local businesses additional support to be able to meet with the changing ways that the community shop, particularly in relation to the move to online shopping for the two years of operation of the scheme.</p>
Race	<p>Harrow profile: Harrow is one of the most diverse places in the country. At the time of 2001 Census 49.9% of Harrow residents were classified as White British. 2011 figures reveal that the White British category now includes only 30.9% of Harrow's population, 69.1% of residents are therefore classified as belonging to a minority ethnic group² The most significant minority ethnic group, at 26.4% is Asian/Asian British: Indian, ranking Harrow as second in England and Wales for its Indian population. Another significant group is classified as Asian/Asian British: Other Asian, making up 11.3% of residents and ranking Harrow 1st within this classification; this group is largely comprised of Sri Lankan community. All Asian/Asian British groups have increased since 2001.</p> <p>White Other is another group which has grown, from 4.49% in 2001 to 8.2% in 2011. Within this group there are 3,868 residents who were born in Poland and 4,784 residents born in Romania, making it the largest Romanian community within England and Wales³. Harrow still has a high Irish born population, ranked 7th in 2011. Whilst Black/African/Caribbean/Black British is not particularly dominant we have the highest number of Kenyan born residents (this can be attributed to a number of migrants from Kenya who are of Asian descent).</p> <p>The implementation of this scheme will give local businesses additional support to be able to meet with the changing ways that the community shop, particularly in relation to the move to online shopping for the two years of operation of the scheme.</p>
Religion and Belief	<p>Harrow profile: The 2001 Census showed that Harrow had the highest level of religious diversity of any local authority in England and Wales. This means that there is a 63 per cent chance that two people at random would be from different religious groups. We do not yet have comparative data for 2011, but the 2011 Census ranked Harrow 1st for persons of Hindu religion, Jain and Unification Church, 2nd for Zoroastrian and 6th for Jewish. Out of 348 areas in England and Wales Harrow has the 2nd lowest ranking of residents with no religion and 5th lowest for Christians (37.3%). Harrow is ranked 24th for Muslim faith residents, who account for 12.5% of the population⁴</p> <p>The implementation of this scheme will give local businesses additional support to be able to meet with</p>

² 2011 Census: Ethnic Group. KS201EW

³ 2011 Census: Country of Birth (detailed). Table QS203EW

⁴ 2011 Census: KS209EW

	the changing ways that the community shop, particularly in relation to the move to online shopping for the two years of operation of the scheme.
Sex / Gender	<p>Of Harrow's total population (240,500), 118,900 (49.4%) are male and 121,600 (50.6%) are female⁵</p> <p>The implementation of this scheme will give local businesses additional support to be able to meet with the changing ways that the community shop, particularly in relation to the move to online shopping for the two years of operation of the scheme.</p>
Sexual Orientation	<p>Harrow profile: The 2011 census did not have a question on sexual orientation; however 306 persons declared living in a same sex couple, an increase of 84 couples. It is estimated that 6% of the UK population are lesbian, gay and bisexual (LGB), which would equate to approximately 14,430 of our residents belonging to the LGB community</p> <p>Since their inception, a total 121 Civil Partnership ceremonies have taken place in Harrow.</p> <p>The implementation of this scheme will give local businesses additional support to be able to meet with the changing ways that the community shop, particularly in relation to the move to online shopping for the two years of operation of the scheme.</p>
Socio Economic	<p>Harrow profile: In comparison to other areas, Harrow was relatively less deprived in 2010 than it was in 2007. It is now ranked 203rd out of 354 boroughs in England (where 1 is the most deprived). In London, Harrow retains its position as 7th least deprived borough (out of 33). The indicator showing the most deprivation in Harrow is Barriers to Housing where it is ranked 54th most deprived nationally.</p> <p>The implementation of this scheme will give local businesses additional support to be able to meet with the changing ways that the community shop, particularly in relation to the move to online shopping for the two years of operation of the scheme.</p>
<p>5. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?</p> <p>List the Title of reports / documents and websites here.</p>	<p>The following information has helped to inform this EqIA:</p> <ul style="list-style-type: none"> - Publishing Equalities Information Meeting the Public Sector Duty January 2013 Harrow Council Our Harrow Our Story – 2013 - http://www.harrow.gov.uk/info/200041/equality_and_diversity/863/public_sector_equality_duty

⁵ Source: 2011 Mid Year Estimates

Stage 3: Assessing Potential Disproportionate Impact

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

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

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

§ **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA

§ It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

NO - If you have ticked 'No' to all of the above, then go to **Stage 6**

§ Although the assessment may not have identified potential disproportionate impact, you may have identified actions which can be taken to advance equality of opportunity to make your proposals more inclusive. These actions should form your Improvement Action Plan at Stage 7

Stage 4: Collating Additional data / Evidence

7. What additional data / evidence have you considered to further assess the potential disproportionate impact of your proposals? (include this evidence, including any data, statistics, titles of documents and website links here)

8. What consultation have you undertaken on your proposals?

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

			with the affected groups, revising your proposals).

Stage 5: Assessing Impact and Analysis

9. What does your evidence tell you about the impact on different groups? Consider whether the evidence shows potential for differential impact, if so state whether this is an adverse or positive impact? How likely is this to happen? How you will mitigate/remove any adverse impact?

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

Gender Reassignment				
Marriage and Civil Partnership				
Pregnancy and Maternity				
Race				
Religion or Belief				
Sex				
Sexual orientation				

10. Cumulative Impact – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic? If yes, which Protected Characteristics could be affected and what is the potential impact?	Yes		No	

10a. Any Other Impact – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion? If yes, what is the potential impact and how likely is to happen?	Yes		No	

11. Is there any evidence or concern that the potential adverse impact identified may result in a Protected Characteristic being disadvantaged? (Please refer to the Corporate Guidelines for guidance on the definitions of discrimination, harassment and victimisation and other prohibited conduct under the Equality Act) available on Harrow HUB/Equalities and Diversity/Policies and Legislation

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

If you have answered "yes" to any of the above, set out what justification there may be for this in Q12a below - link this to the aims of the proposal and whether the disadvantage is proportionate to the need to meet these aims. (You are encouraged to seek legal advice, if you are concerned that the proposal may breach the equality legislation or you are unsure whether there is objective justification for the proposal)

If the analysis shows the potential for serious adverse impact or disadvantage (or potential discrimination) but you have identified a potential justification for this, this information must be presented to the decision maker for a final decision to be made on whether the disadvantage is proportionate to achieve the aims of the proposal.

§ If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. **(select outcome 4)**

§ If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. **(select outcome 4)**

Stage 6: Decision

12. Please indicate which of the following statements best describes the outcome of your EqIA (tick one box only)

Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.

Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. *List the actions you propose to take to address this in the Improvement Action Plan at Stage 7*

Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse

impact and/or plans to monitor the impact. (Explain this in 12a below)	
Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	
12a. If your EqIA is assessed as outcome 3 or you have ticked 'yes' in Q11 , explain your justification with full reasoning to continue with your proposals.	

Stage 7: Improvement Action Plan					
13. List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.					
Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan
There is no adverse impact as a result of the introduction of the policy however there is a need to ensure that all relevant businesses are aware of the discretionary support to be provided.	Ensure that all businesses that sit within the criteria outlined within the policy are made aware of the scheme and given the opportunity to apply for the Business Rates Retail Relief	100% applicable businesses receiving the Business Rates Retail relief		Lynn Allaker	01/04/2014

Stage 8 - Monitoring

The full impact of the proposals may only be known after they have been implemented. It is therefore important to ensure effective monitoring measures are in place to assess the impact.

<p>14. How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>The new policy will be monitored by the Collections Team to ensure take-up from all businesses that meet the criteria.</p>
<p>15. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p>	<p>Monitoring of the scheme will be reported through to the Head of Collections and Benefits.</p>
<p>16. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.</p>	<p>None – it is a new proposed policy</p>

Stage 9: Public Sector Equality Duty

17. How do your proposals contribute towards the Public Sector Equality Duty (PSED) which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups.

(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible working hours for parents/carers, IT equipment will be DDA compliant etc)

Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups
<p>Access to the relief is open to all business properties that have a rateable value of £50,000 or less and meet the applicable criteria.</p>	<p>Communications will be held with all applicable businesses within Harrow to ensure they are able to apply to receive the Business Rates Retail Relief for the years 2014-15 and 2015-16.</p>	<p>All protected groups could potentially access the services and businesses that are able to access the relief.</p>

Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)

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

18. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	EqIA Quality Assurance Group		
Signed: (Lead officer completing EqIA)	Fern Silverio	Signed: (Chair of DETG)	Alex Dewsnap
Date:		Date: 01/03/2014	
Date EqIA presented at the EqIA Quality Assurance Group		Signature of ETG Chair	