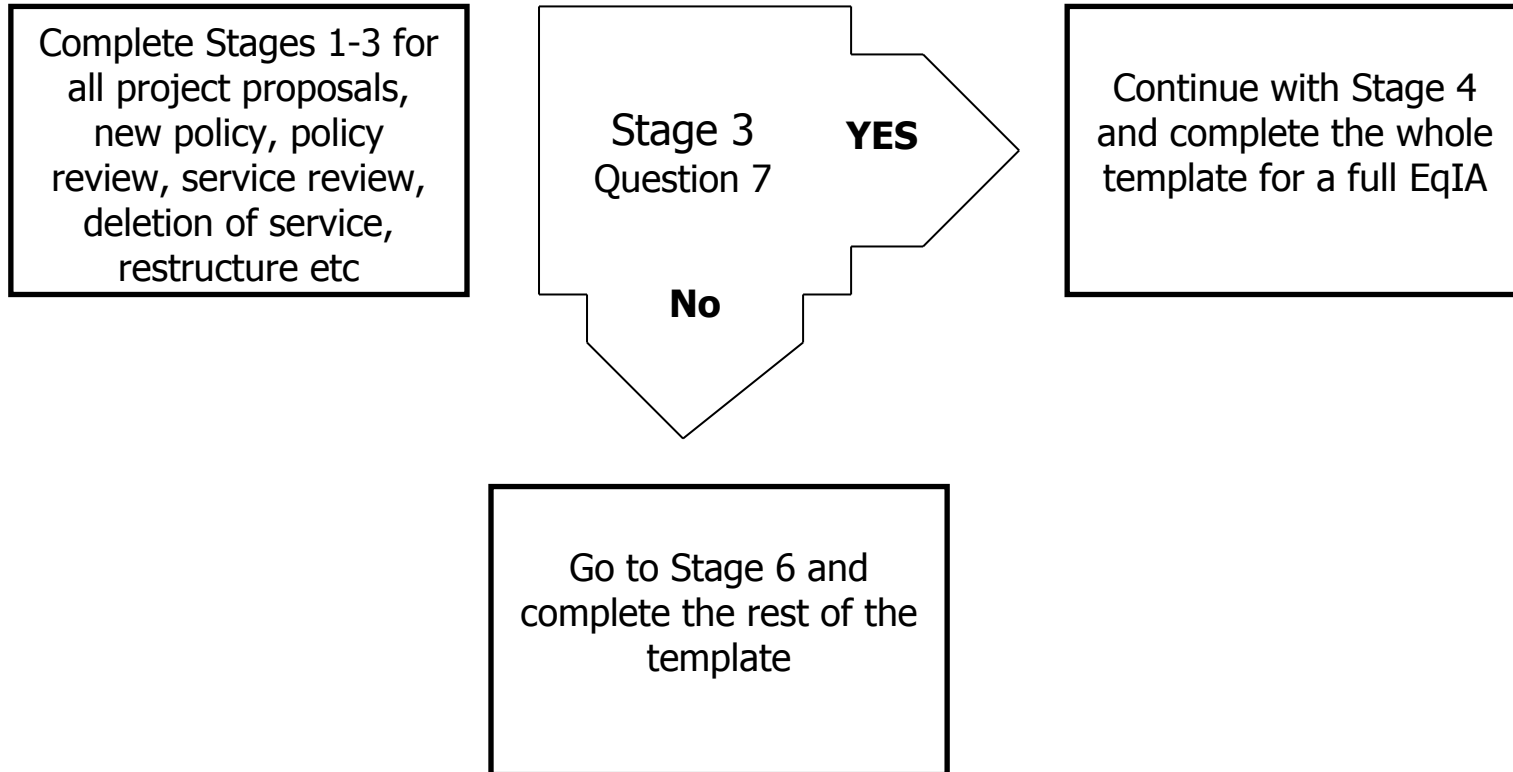


Equality Impact Assessment Template

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 | Grant Funding | ✓ | Other | |
| Title of Project: | | Hard to treat energy efficiency measures, private sector homes | | |
| Directorate / Service responsible: | | Asset Management Community, Health & Wellbeing | | |
| Name and job title of lead officer: | | Natalie Sansom-Climate Change Officer | | |
| Name & contact details of the other persons involved in the assessment: | | Maggie Challoner- Head of Asset Management Michael Sheehy-Service Manager Aids and Adaptations Kulwinder Singh-Rai – Asset, Data & Planning Manager | | |
| Date of assessment: | | 21st July 2014 | | |

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><i>Deliver opportunities to home owners to access funding towards hard to treat energy efficiency measures (such as solid wall insulation) by initially targeting homes on a street by street basis. A review period is built in to the delivery plan, for January 2015 when expanding the plan to include a borough-wide offer will be considered. This will be determined by the take up of the offer from September-December 2014</i></p> | | | | |
| <p>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</p> | Residents / Service Users | ✓ | Partners | ✓ | Stakeholders |
| | Staff | | Age | | Disability |

| | | | | | | |
|--|---------------------|--|--------------------------------|--|-------------------------|--|
| | Gender Reassignment | | Marriage and Civil Partnership | | Pregnancy and Maternity | |
| | Race | | Religion or Belief | | Sex | |
| | Sexual Orientation | | Other | | | |

3. Is the responsibility shared with another directorate, authority or organisation? If so:

- Who are the partners?
- Who has the overall responsibility?
- How have they been involved in the assessment?

Asset Management holds the overall responsibility for the planning and implementation of the project, but the parameters (i.e. the focus on a street by street approach) has been determined by the Department of Climate Change (DECC) who have provided grant funding for the project. DECC have been consulted at all stages of the delivery of the project and Housing Needs have been consulted about the option to include private sector landlords, working on the Help 2 Let scheme as part of the scheduled review.

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)

Census data: In the period 2001-2011, Harrow's population has grown by more than 15% to 239,000. The 0-14 age group is estimated to have increased by 15.7% due to a significant number of births within the Borough within the last 10 years, and those aged 65+ are estimated to have increased by 12.3% within the same period. Household size within the borough is the second highest in the country at 2.8 people per household (Office for National Statistics, 2001 and 2011).

The areas proposed for the street by street approach have been selected because of the suitability of the buildings for the works required (i.e. houses with solid walls) No specific information is held on the protected characteristics of people living in the area.

The proposed energy efficiency measures will deliver warmer homes and reduce fuel bills to those home owners that chose to go ahead with the scheme. This will benefit households of all ages, but will particularly impact on those with young children and older people because of the known

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| | <p><i>beneficial impact of warmer homes on these groups and the link to health. As the project will take a street by street approach, undertaking promotional activities to attract interest from home owners it has not as yet been possible to undertake any consultation with potential customers. Households are going to have to make a financial contribution towards the works and be interested in having the measures installed in their homes. However individual assessments will be undertaken for any households that express an interest that will take into account both the impact on the individual home and the circumstances of the occupiers.</i></p> |
| Disability (including carers of disabled people) | <p><i>Census data and housing stock condition survey: 14.6% of residents in Harrow report a limiting long-term illness or disability which limits their day-to-day activities. This is below the national average of 17.9%, but represents an increase of 13.2% since 2001 (Office for National Statistics, 2001 and 2011). The 2001 housing stock condition survey (updated in 2008) highlighted that 78% of private sector housing stock within the borough was pre-1949, and with older housing comes particular issues of condition and its impact on the health and safety of those living within it, especially vulnerable households.</i></p> <p><i>The areas proposed for the street by street approach have been selected because of the suitability of the buildings for the works required (i.e. houses with solid walls) No specific information is held on the protected characteristics of people living in the area.</i></p> <p><i>The proposed energy efficiency measures will deliver warmer homes and reduce fuel bills to those home owners that chose to go ahead with the scheme. This will benefit all households, but will particularly impact on those with physical disabilities because of the known beneficial impact of warmer homes on these groups and the link to health. As the project will take a street by street approach, undertaking promotional activities to attract interest from home owners it has not as yet been possible to undertake any consultation with potential customers. Households are going to have to make a financial contribution towards the works and be interested in having the measures installed in their homes. However individual assessments will be undertaken for any households that express an interest that will take into account both the impact on the individual home and the circumstances of the occupiers.</i></p> |
| Gender Reassignment | <p><i>The areas proposed for the street by street approach have been selected because of the suitability of the buildings for the works required (i.e. houses with solid walls) No specific information is held on the protected characteristics of people living in the area.</i></p> |
| Marriage / Civil Partnership | <p><i>Census data: Harrow has a very high percentage of married couples, with 53.7% of residents aged 16 and older declaring they were in a marriage in 2011. This is above the national level of 46.6%.</i></p> |

| | |
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| | <p><i>There was a 27% increase in the number of married people living in Harrow between 2001 and 2011 (Office for National Statistics, 2001 and 2011). Between their inception and January 2012, 107 civil partnership ceremonies took place in Harrow.</i></p> <p><i>The areas proposed for the street by street approach have been selected because of the suitability of the buildings for the works required (i.e. houses with solid walls) No specific information is held on the protected characteristics of people living in the area.</i></p> |
| Pregnancy and Maternity | <p><i>Census data: There has been a 32% (+3,900) increase in 0-4 year olds since 2001. There are pockets of high concentration in central and south-west Harrow. 15,916 (6.7%) residents were aged four and under in 2011. 78% of applicants of accepted homeless households applying through the Locata system have dependent children. (Data as at April 2013).</i></p> <p><i>The areas proposed for the street by street approach have been selected because of the suitability of the buildings for the works required (i.e. houses with solid walls) No specific information is held on the protected characteristics of people living in the area.</i></p> |
| Race | <p><i>Census data: 2011 Census data shows that 69.1% of Harrow's residents are minority ethnic, where minority ethnic is defined as all people who are non-White British. Nationally, Harrow now has the fourth lowest proportion of White British residents, compared to a ranking of 8th in 2001. The White British population group has fallen by 28.5% since 2001, suggesting that Harrow is becoming increasingly diverse (Office for National Statistics, 2011).</i></p> <p><i>The areas proposed for the street by street approach have been selected because of the suitability of the buildings for the works required (i.e. houses with solid walls) No specific information is held on the protected characteristics of people living in the area.</i></p> |
| Religion and Belief | <p><i>Census data: The 2011 Census revealed that religious affiliation is very high in Harrow; at 9.6%, the borough has the 2nd lowest number of residents who stated that they have no religion. This compares to 24.7% nationally (Office for National Statistics, 2011).</i></p> <p><i>The areas proposed for the street by street approach have been selected because of the suitability of the buildings for the works required (i.e. houses with solid walls) No specific information is held on the protected characteristics of people living in the area.</i></p> |
| Sex / Gender | <p><i>Census data: In 2011, 49.4% of Harrow residents were male and 50.6% are female. This is very similar to the national profile, but the number of males in Harrow has slightly increased since 2001</i></p> |

| | | | |
|--|--|--|--|
| | <i>(Office for National Statistics, 2001 and 2011).</i> | | |
| | <i>The areas proposed for the street by street approach have been selected because of the suitability of the buildings for the works required (i.e. houses with solid walls) No specific information is held on the protected characteristics of people living in the area.</i> | | |
| Sexual Orientation | <i>The areas proposed for the street by street approach have been selected because of the suitability of the buildings for the works required (i.e. houses with solid walls) No specific information is held on the protected characteristics of people living in the area.</i> | | |
| Socio Economic | <p><i>Census data: Harrow is ranked 203rd out of 354 Districts in England where 1st is the most deprived. Most multiple deprivation is in the centre of the borough, with pockets of deprivation in the south and east. Harrow's least deprived areas are found in the west of the borough</i></p> <p><i>Harrow is worse than the national average for income deprivation, but less deprived. Most income deprivation is in the centre, with pockets of deprivation across the borough. There are small clusters of high economic deprivation across Harrow, largely coinciding with areas containing higher levels of social housing. 16,994 households received Housing Benefit in December 2012, a rate of 201.7 per 1,000 households.</i></p> <p><i>2.9% (4,386) of Harrow's working population were unemployed in February 2012. This is below the rates of London and England, 4.4% and 4.2% respectively. 17% (31,997) of Harrow's population aged 16 and over had no formal qualifications in 2011. The proportion of the resident population without any qualifications is lower than the averages for England and London. People without qualifications are more highly concentrated in the east and southeast of the borough.</i></p> <p><i>The areas proposed for the street by street approach have been selected because of the suitability of the buildings for the works required (i.e. houses with solid walls) No specific information is held on the protected characteristics of people living in the area, however the area is one of the more deprived within the borough.</i></p> | | |
| 5. 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 |

| | | | |
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| | | | with the affected groups, revising your proposals). |
| Department of Energy and Climate Change | Direct consultation with officers responsible for monitoring the project | N/A | We have revised our proposals to increase the number of homes to be targeted by the street by street approach |
| | | | |
| | | | |

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

List the Title of reports / documents and websites here.

[http://www.harrow.gov.uk/info/200088/statistics and census information](http://www.harrow.gov.uk/info/200088/statistics-and-census-information)

Stage 3: Assessing Potential Disproportionate Impact

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

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

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

- **Best Practice:** You may want to consider setting up a Working Group (including colleagues, partners, stakeholders, voluntary community sector organisations, service users and Unions) to develop the rest of the EqIA
- It will be useful to also collate further evidence (additional data, consultation with the relevant communities, stakeholder groups and service users directly affected by your proposals) to further assess the potential disproportionate impact identified and how this can be mitigated.

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

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

Stage 4: Collating Additional data / Evidence

| | |
|--|---|
| <p>8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?</p> <p><i>(include this evidence, including any data, statistics, titles of documents and website links here)</i></p> | <p>Demographics for the Super Output area to be targeted, which indicate this is likely to be the area of the borough with the highest fuel poverty-an issue the scheme will help to address</p> |
|--|---|

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

| Who was consulted? | What consultation methods were used? | What do the results show about the impact on different 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). |
|--------------------|--------------------------------------|--|--|
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Stage 5: Assessing Impact and Analysis

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

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

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|--|-----|---|----|---|
| Pregnancy and Maternity | | | | |
| Race | | | | |
| Religion or Belief | | | | |
| Sex | | | | |
| Sexual orientation | | | | |
| 11. 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 | ✓ |
| | | | | |
| 11a. Any Other Impact – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion? If yes, what is the potential impact and how likely is to happen? | Yes | ✓ | No | |

Energy efficiency measures such as solid wall insulation, and where appropriate other measures can have a significant dual benefit of delivering warmer homes and helping to reduce the fuel bills of residents. In turn this could have a positive impact on residents health by eliminating hazards such as excess cold-whether caused by inadequate heating or poverty.

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

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

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

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

- If there are adverse effects that are not justified and cannot be mitigated, you should not proceed with the proposal. **(select outcome 4)**
- If the analysis shows unlawful conduct under the equalities legislation, you should not proceed with the proposal. **(select outcome 4)**

Stage 6: Decision

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

| | |
|--|---|
| Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed. | X |
| Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 7</i> | |
| Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In | |

| | |
|--|--|
| some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. (Explain this in 13a below) | |
| Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation) | |
| 13a. If your EqIA is assessed as outcome 3 or you have ticked 'yes' in Q12 , explain your justification with full reasoning to continue with your proposals. | |

Stage 7: Improvement Action Plan

14. List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

| Area of potential adverse impact e.g. Race, Disability | Action required to mitigate | How will you know this is achieved? E.g. Performance Measure / Target | Target Date | Lead Officer | Date Action included in Service / Team Plan |
|--|-----------------------------|---|-------------|--------------|---|
| | | | | | |
| | | | | | |
| | | | | | |

Stage 8 - Monitoring

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

| | |
|---|---|
| 15. How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do | <ul style="list-style-type: none"> The delivery plan is to be finalised once our delivery partners have been procured (anticipated date late August 2014) residents. |
|---|---|

| | |
|---|--|
| <p>this? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p> | <ul style="list-style-type: none"> • Financial approval has already been granted. Promotional activities to encourage take up of the scheme will commence in September • Delivery against objectives will be monitored by the Project Group and reported to Contracts Bard and DECC through monthly reports. • This will include number of homes assessed, financial assessments undertaken, number of homes who elect to go ahead with the works proposed, works started and works completed • Impact of the works on individual home owners and in terms of the Council's climate change strategy will be monitored. |
| <p>16. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i></p> | <p>The impact of the energy efficiency works that go ahead will be reported to Cabinet as part of regular updates on the implementation of the Climate Change strategy.</p> |
| <p>17. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.</p> | <p>We have not received any complaints at this stage in the preparation to begin the project.</p> |
| <p>Stage 9: Public Sector Equality Duty</p> | |
| <p>18. How do your proposals contribute towards the Public Sector Equality Duty (PSED) which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between different groups.</p> <p>(Include all the positive actions of your proposals, for example literature will be available in large print, Braille and community languages, flexible</p> | |

| | | |
|--|---|--|
| working hours for parents/carers, IT equipment will be DDA compliant etc) | | |
| Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010 | Advance equality of opportunity between people from different groups | Foster good relations between people from different groups |
| The objective of this project is to improve energy efficiency, promote warmer homes and reduce fuel bills of residents, including those who are categorised under the protected characteristics. However to do this it is essential to ensure that our delivery partner is well aware of the diversity of Harrow residents and will therefore take all necessary steps to engage appropriately with all residents and the requirement to do this will be included in the tender | This project will further enhance the quality of housing for residents. This will improve and promote equality of opportunity across the protected characteristics. | The project will promote awareness of the importance of energy efficiency. This should assist to foster good relations between people from different groups. |

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

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

| | | | |
|---|-----------------------------|-------------------------|-----------|
| 19. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan? | Asset Management Department | | |
| Signed: (Lead officer completing EqIA) | Maggie Challoner | Signed: (Chair of DETG) | To follow |
| Date: | 21 st July 2014 | Date: | To follow |
| Date EqIA presented at the EqIA Quality Assurance Group | | Signature of ETG Chair | |