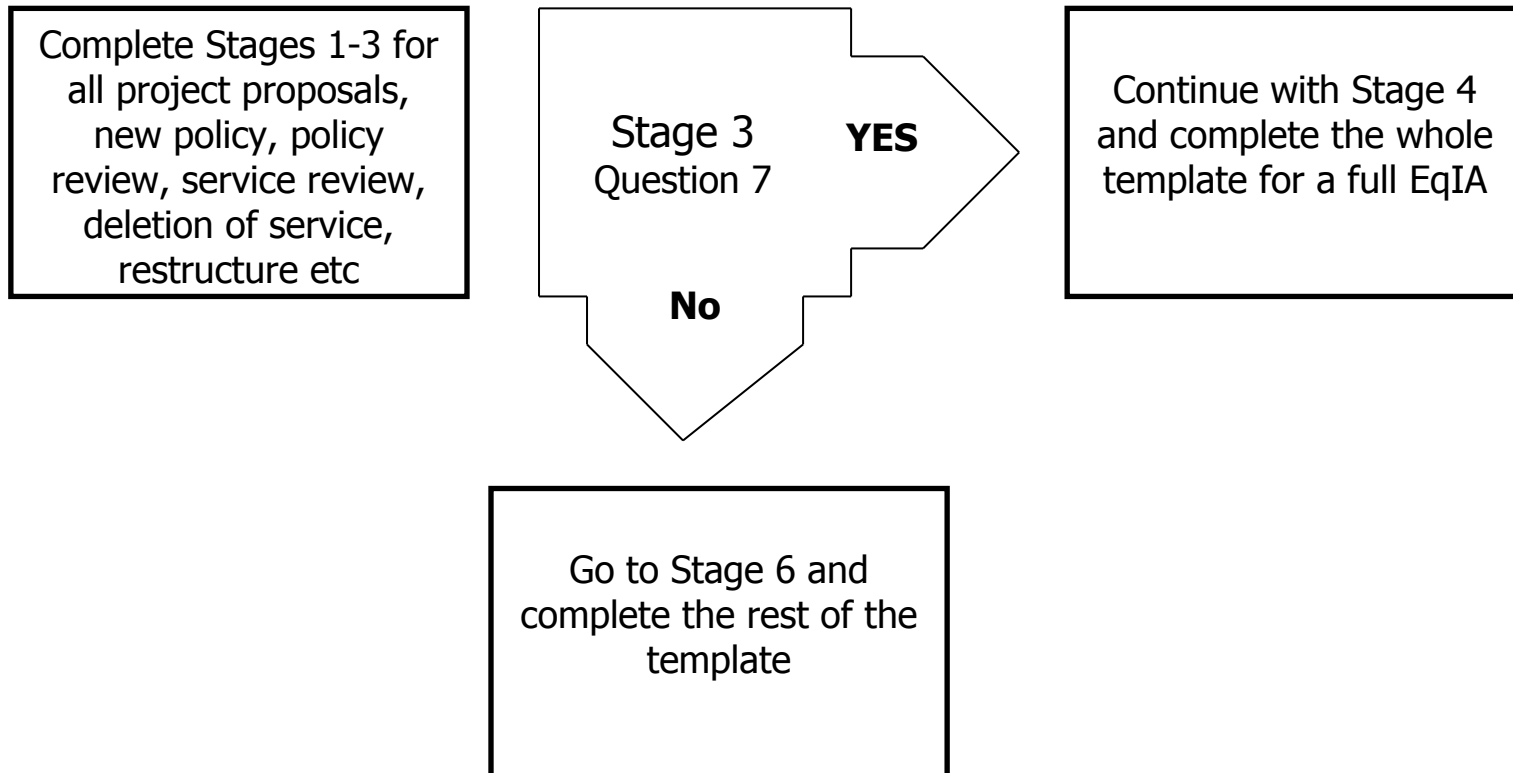


Equality Impact Assessment Template

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	Constitutional Working Group	✓
Title of Project:		Refresh of the existing Contract Procedure Rules & Financial Regulations			
Directorate / Service responsible:		Resources – Finance Resources – Commercial, Contracts & Procurement			
Name and job title of lead officer:		Dawn Calvert – Head of Strategic Finance & Business Nimesh Mehta – Commercial Business Partner			
Name & contact details of the other persons involved in the assessment:		Nimesh Mehta nimesh.mehta@harrow.gov.uk Anand Pajpani anand.pajpani@harrow.gov.uk			
Date of assessment:		17/09/14			

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>Refresh the Council's Financial Regulations and the Contract Procedure Rules (CPR's).</p> <p>The purpose of refreshing the Financial Regulations:</p> <ul style="list-style-type: none"> • To correct drafting issues • To move away from referencing job titles to referring to 'grades' / statutory
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	<p>titles to reduce the number of refreshes required as job titles change / re-structures take place</p> <ul style="list-style-type: none"> To update Scheme of Delegation where appropriate and ensure consistency with the newly refreshed Contract Procedure Rules, Procurement Card policy etc. To ensure that all the referenced financial procedure notes, policies and strategies referenced in the regulations are completed <p>The current CPRs have been in place since 2009 and there have been significant changes to the landscape of local government procurement and the legal framework around it since that time. The purpose of refreshing them:</p> <ul style="list-style-type: none"> A desire to ensure that the CPRs support income generation The Public Services (Social Value) Act 2012 The introduction of the Local Government Transparency Code 2014 Ensure the CPRs will support the delivery of the recently approved Commercial Strategy 					
<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	✓
<p>3. Is the responsibility shared with another directorate, authority or organisation? If so:</p> <ul style="list-style-type: none"> Who are the partners? Who has the overall responsibility? How have they been involved in the assessment? 	Staff	✓	Age		Disability	
	Gender Reassignment		Marriage and Civil Partnership		Pregnancy and Maternity	
	Race		Religion or Belief		Sex	
	Sexual Orientation		Other			
	<p>Overall responsibility for the Financial Regulations & Contract Procedure Rules update will lie with both Finance and the Commercial, Contracts & Procurement teams.</p>					

Stage 2: Evidence / Data Collation

- 4. What evidence / data have you reviewed to assess the potential impact of your proposals? Include the actual data, statistics reviewed in the section below. This can include census data, borough profile, profile of service users, workforce profiles, results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys; complaints etc. Where possible include data on the nine Protected Characteristics.
- (Where you have gaps (data is not available/being collated), you may need to include this as an action to address in your Improvement Action Plan at Stage 7)

Age (including carers of young/older people)	<ul style="list-style-type: none"> • 0-4: 6.7%, 5-15: 13.4%, 16-64: 65.8%, 65+: 14.1% • This proposal is for the refresh of already existing policy documents, however where these revised versions result in initiatives which have a potential impact on this group an Initial EQIA will be completed where appropriate to do so.
Disability (including carers of disabled people)	<ul style="list-style-type: none"> • 8,160 people in Harrow were recipients of Disability Living Allowance (DLA) in February 2012. • This proposal is for the refresh of already existing policy documents, however where these revised versions result in initiatives which have a potential impact on this group an Initial EQIA will be completed where appropriate to do so.
Gender Reassignment	<ul style="list-style-type: none"> • No information collected. • This proposal is for the refresh of already existing policy documents, however where these revised versions result in initiatives which have a potential impact on this group an Initial EQIA will be completed where appropriate to do so.
Marriage / Civil Partnership	<ul style="list-style-type: none"> • No information collected. • This proposal is for the refresh of already existing policy documents, however where these revised versions result in initiatives which have a potential impact on this group an Initial EQIA will be completed where appropriate to do so.
Pregnancy and Maternity	<ul style="list-style-type: none"> • No information collected, though ONS data reveals 3,585 births in Harrow in 2012.

	<ul style="list-style-type: none"> This proposal is for the refresh of already existing policy documents, however where these revised versions result in initiatives which have a potential impact on this group an Initial EQIA will be completed where appropriate to do so.
Race	<ul style="list-style-type: none"> 2011 ONS data: White 42%, Mixed 4%, Asian/Asian British 43%, Black/African/Caribbean/Black British 8%, Other 3% This proposal is for the refresh of already existing policy documents, however where these revised versions result in initiatives which have a potential impact on this group an Initial EQIA will be completed where appropriate to do so.
Religion and Belief	<ul style="list-style-type: none"> Christian: 37%, Hindu: 25%, Muslim: 12%, No religion: 10%, Jewish: 4%, Other: 2%, Sikh: 1%, Buddhist: 1% This proposal is for the refresh of already existing policy documents, however where these revised versions result in initiatives which have a potential impact on this group an Initial EQIA will be completed where appropriate to do so.
Sex / Gender	<ul style="list-style-type: none"> 50.6 per cent of Harrow's residents are females: 49.4 per cent are males This proposal is for the refresh of already existing policy documents, however where these revised versions result in initiatives which have a potential impact on this group an Initial EQIA will be completed where appropriate to do so.
Sexual Orientation	<ul style="list-style-type: none"> No information collected. This proposal is for the refresh of already existing policy documents, however where these revised versions result in initiatives which have a potential impact on this group an Initial EQIA will be completed where appropriate to do so.
Socio Economic	<ul style="list-style-type: none"> In April 2013, 5,712 businesses were paying business rates to Harrow Council. Between 20-21% of Harrow's households were receiving Housing Benefit and/or Council Tax Benefit in December 2012.

	<ul style="list-style-type: none"> • 2.9% (4,386) of Harrow's working population were unemployed in February 2012. • In February 2012, around 11,400 of Harrow's working age residents were in receipt of either ESA, IS, IB or SDA. • This proposal is for the refresh of already existing policy documents, however where these revised versions result in initiatives which have a potential impact on this group an Initial EQIA will be completed where appropriate to do so.
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• **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 with the affected groups, revising your proposals).
<p>This proposal is for the refresh of an already existing set of Financial Regulations and Contract Procedure Rules.</p> <p>Where necessary, further consultation will be undertaken with residents and communities to shape the delivery of these proposals, in keeping with the ambition of the Administration to consult and engage.</p>	<p>The refresh of the current set of Financial Regulations and Contract Procedure Rules is based on the manifesto of the current administration and Corporate Plan of the Council.</p>	<p>There is no disproportionate impact of different groups.</p>	<p>No equalities issues identified.</p>

<ul style="list-style-type: none"> • 6. What other (local, regional, national research, reports, media) data sources that you have used to 	<ul style="list-style-type: none"> • ONS data, census data from 2011, Harrow Vitality Profiles, Disability
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inform this assessment? List the Title of reports / documents and websites here.	statistics from the Harrow Council website.
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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	✓	✓	✓	✓	✓	✓	✓	✓	✓

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

<ul style="list-style-type: none"> • 8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3? • (include this evidence, including any data, statistics, titles of documents and website links here) 	
<ul style="list-style-type: none"> • 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).

Stage 5: Assessing Impact and Analysis

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

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

people)							
Gender Reassignment							
Marriage and Civil Partnership							
Pregnancy and Maternity							
Race							
Religion or Belief							
Sex							
Sexual orientation							
11. Cumulative Impact – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative				Yes		No	

impact on a particular Protected Characteristic? If yes, which Protected Characteristics could be affected and what is the potential impact?	No impact
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11a. Any Other Impact – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion? If yes, what is the potential impact and how likely is to happen?	Yes		No	

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

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

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

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

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

Stage 6: Decision

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

Outcome 1 – No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality are being addressed.	✓
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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
All	Ensure that where appropriate key initiatives resulting from objectives within the Category Management approach have initial Equality Impact Assessments undertaken, and where necessary full EqIAs.	Documentation completed in accordance Council policy.	Before the end of 2015/16 and annually thereafter.	Terry Brewer, Divisional Director, Commercial, Contracts & Procurement	
All	The progress against this approach will be reviewed at least every six months with Scrutiny.	Progress reports provided to Scrutiny and their feedback to these.	To fit with the Scrutiny cycle.	Terry Brewer, Divisional Director, Commercial, Contracts & Procurement	

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Stage 8 - Monitoring

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

15. How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	The progress against this Strategy will be reviewed at least every six months with Scrutiny.
16. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	As above, with Scrutiny.
17. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	No

Stage 9: Public Sector Equality Duty

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

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

Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups
The initiatives that deliver this approach are not likely to have any direct impact however if they do, will always seek to support the Council in eliminating discrimination, harassment and victimisation.	The initiatives that deliver this approach are not likely to have any direct impact however if they do, will always seek to support the advancement of equality of opportunity.	The initiatives that deliver this approach are not likely to have any direct impact however if they do, will always seek to support the fostering of good relations between 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?	None at this stage		
Signed: (Lead officer completing EqIA)	Terry Brewer	Signed: (Chair of DETG)	Alex Dewsnap
Date:	4/08/14	Date:	04/08/14
Date EqIA presented at the EqIA Quality Assurance Group	N/A	Signature of ETG Chair	