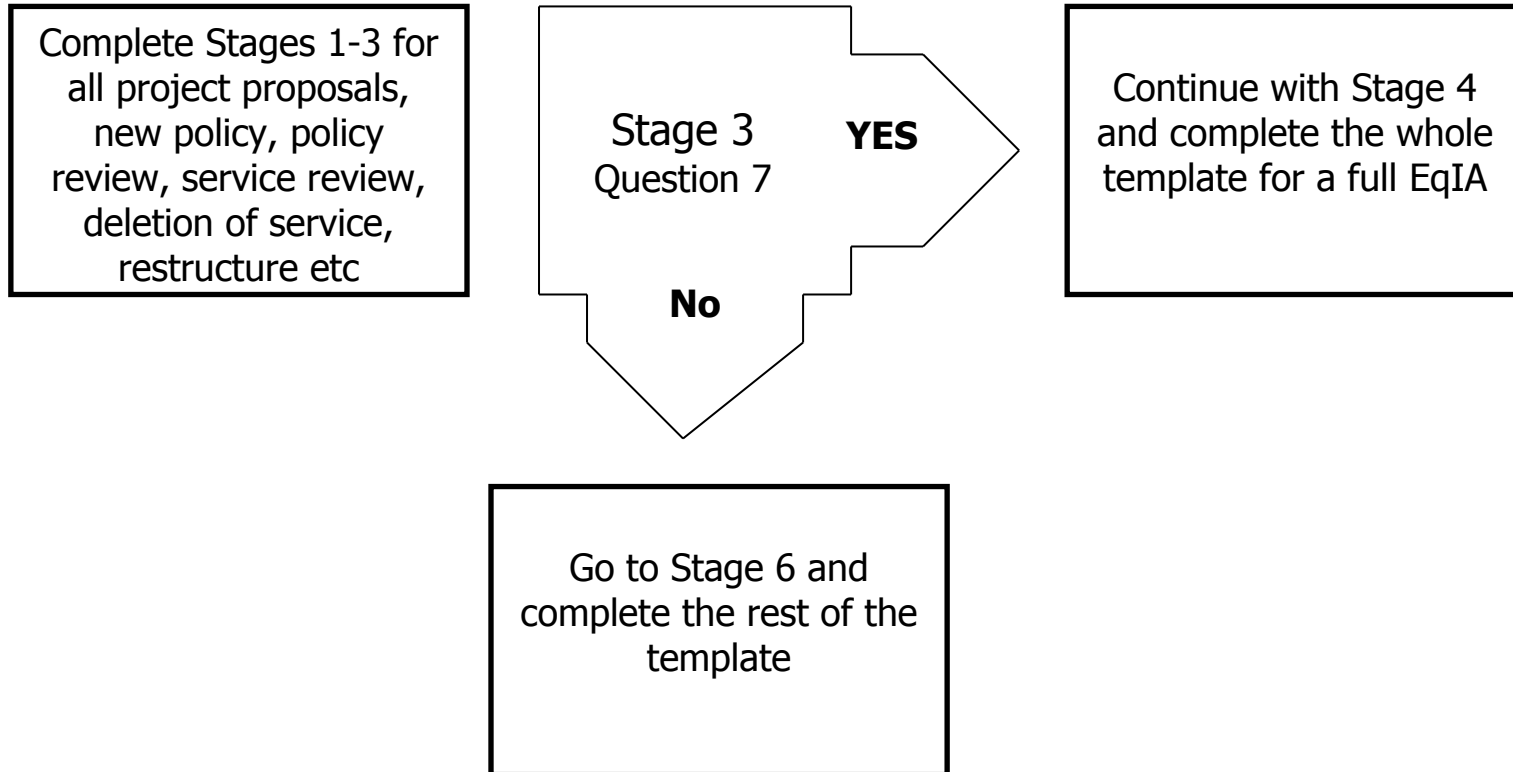


# Equality Impact Assessment Template

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	X
Capital		Portfolio Holder	
Service Plan		Corporate Strategic Board	
Other		Other	
Title of Project:	<p>Ref: E&amp;E E14 Highways maintenance – changes to the response times on non-urgent reactive works i.e. respond to these in 48 hours instead of existing 24 hours.</p> <p>Ref: E&amp;E E15m Street Lighting and drainage budgets – capital investment allows for lower on going maintenance costs.</p>		
Directorate / Service responsible:	Environment and Enterprise		
Name and job title of lead officer:	Venetia Reid-Baptiste, Divisional Director		
Name & contact details of the other persons involved in the assessment:			
Date of assessment:			
<b>Stage 1: Overview</b>			
<p><b>1. What are you trying to do?</b></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>To reduce the costs of Highways, drainage and street lighting repairs. We are able to make these savings due to an extensive 4 year programme of capital investment in these highway assets including refurbishment of street lighting equipment, roads, footways and drainage systems. This refurbishment programme will enable proactive works, which will result in repairs and replacements being tackled effectively and at an early stage before they become a local problem. This will result in fewer non urgent reactive works and the response time for such work will reduce from 48 hours to 24 hours.</p> <p>We do not expect the travelling public to notice any detrimental impacts on the highway network as a result of these savings; and the capital investment</p>		

programmes are already having a noticeable and beneficial impact.

However as the service focuses on pre-emptive works and overall improvement to the road networks, non urgent reactive works will be reduced as the programme commences. There will be no reduction in emergency works but repairs will only be undertaken where the defect meets a specific level.

<b>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</b>	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?

No

**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)	There is unlikely to be any disproportionate adverse affect on protected groups as the maintenance budget is only dropping following capital investment.
Disability (including carers of disabled people)	
Gender Reassignment	
Marriage / Civil Partnership	
Pregnancy and Maternity	
Race	
Religion and Belief	
Sex / Gender	
Sexual Orientation	
Socio Economic	

**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).
Consultation was undertaken on proposal Ref: E&E E14 Highways maintenance and 15 Street lighting and drainage to identify areas of most need for non emergency.	An on line survey supported by self completion questionnaires was undertaken using the Community Champion network to	The survey asked respondents to provide a satisfaction rating with the current service and to identify priority areas to target maintenance if there is a reduction in reactive maintenance. The results were: <ul style="list-style-type: none"> <li>58% rated the current service as very good to satisfactory and 42% rated it as poor</li> </ul>	Current service levels which include elements of the proposals are rated as being acceptable by 58% of respondents.  Further consultation is considered as the programme progresses to monitor effectiveness

The consultation was undertaken with Community Champions	provide an indicative cross section of the population of Harrow and a final sample size of 222 was achieved. The Community Engagement team publicised the web link through the Champion Network.	There is no specific impact on a protected characteristic.	
		Respondents were asked to rate Highway priority areas in terms of importance, to identify priority areas for potential reactive works. <b>Major routes</b> was the most important priority area (89%), followed by <b>roads around shopping centres</b> (69%)	Major routes will be prioritised Roads around shopping centres will have more stringent inspection regimes.
		If there was a reduction in reactive works to street lighting and priority areas need to be identified, respondents were asked to rate them in terms of importance	<b>Key intervention areas are :-</b> Areas identified by the Police as having an above average record of crime 91% of respondents  Street lights installed for community safety reasons 88% of respondents  Formal pedestrian crossings, subways 85% of respondents.

<p>6. 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>	None
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**7. Based on the evidence you have considered so far, is there a risk that your proposals could potentially have a disproportionate adverse impact on any of the Protected Characteristics?**

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

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

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

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

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

#### Stage 4: Collating Additional data / Evidence

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

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

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

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different 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.  <b>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9</b>	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				
<b>11. Cumulative Impact</b> – 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	
<b>11a. Any Other Impact</b> – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity,	Yes		No	



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?

**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)

<b>Outcome 1</b> – 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
<b>Outcome 2</b> – 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>	
<b>Outcome 3</b> – 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. <b>(Explain this in 13a below)</b>	

<b>Outcome 4</b> – 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)	
<b>13a.</b> If your EqIA is assessed as <b>outcome 3 or you have ticked 'yes' in Q12</b> , 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.

<b>15.</b> 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	No significant impact on protected groups. However, monitoring will be undertaken if required. Consultation and data analysis to determine the impact on any protected groups, only if it appears to be necessary
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this? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	after implementation as at this stage it is anticipated that there will be no impact on protected groups.
<b>16.</b> How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	Further Committee report if necessary
<b>17.</b> 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

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

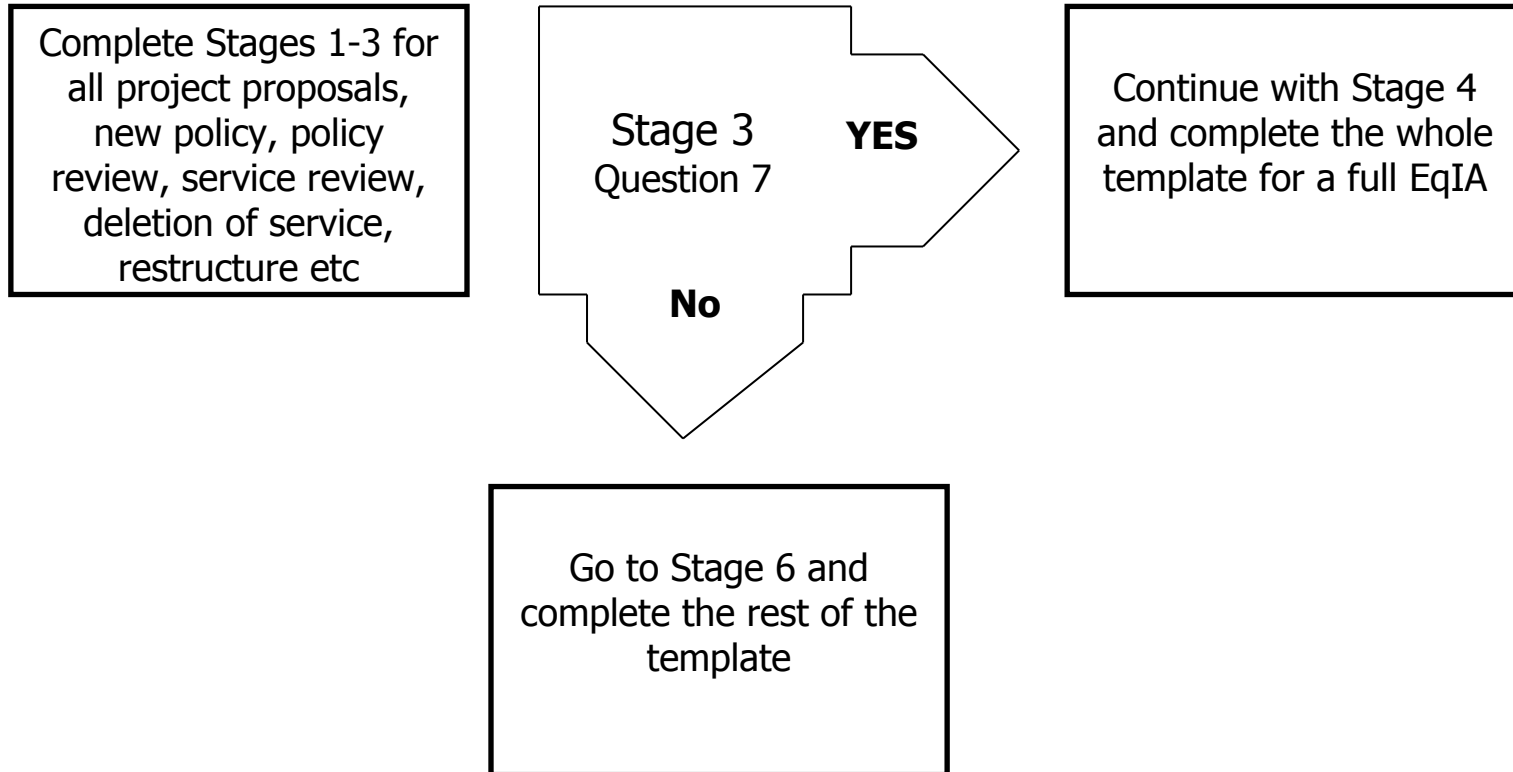
**The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG) to be signed off.**

<b>19.</b> Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?			
Signed: (Lead officer completing EqIA)	Venetia Reid-Baptiste	Signed: (Chair of DETG)	Paul Nichols
Date:		Date:	10/11/14

Date EqIA presented at the EqIA Quality Assurance Group		Signature of ETG Chair	
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# 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:		E & E E16 Clinical Waste – Review of current waste composition to identify genuine clinical waste which will be collected by specialist service.		
Directorate / Service responsible:		Environment & Enterprise Waste Service		
Name and job title of lead officer:		Alan Whiting Environmental Service Manager		
Name & contact details of the other persons involved in the assessment:				
Date of assessment:		3 <sup>rd</sup> July 2014		

### Stage 1: Overview

<p><b>1. What are you trying to do?</b></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>The clinical waste service is currently provided to approx. 250 residents. The NHS notifies the council that a collection service is required and the council collects the waste using a dedicated van and driver.</p> <p>The service collects incontinence pads and genuine clinical waste as though it were all high risk waste. This is all sent for incineration – a costly disposal route.</p> <p>It is proposed that waste classed as non-clinical (eg incontinence pads) will be collected fortnightly and disposed of as normal landfill which will considerably reduce incineration costs.</p> <p>For those residents that still have genuine clinical waste, there will be no change in</p>
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	<p>service provision. Clinical waste will continue to be collected weekly. The directorate are to investigate the use of a NHS approved framework contract for the collection and disposal of the genuine clinical waste therefore the client may see a change in provider but no change in frequency. Any change in provider will be clearly communicated.</p>					
<p><b>2.</b> Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</p>	Residents / Service Users	X	Partners	x	Stakeholders	
	Staff		Age	X	Disability	X
	Gender Reassignment		Marriage and Civil Partnership		Pregnancy and Maternity	
	Race		Religion or Belief		Sex	
	Sexual Orientation		Other			
<p><b>3.</b> Is the responsibility shared with another directorate, authority or organisation? If so:</p> <ul style="list-style-type: none"> <li>• Who are the partners?</li> <li>• Who has the overall responsibility?</li> <li>• How have they been involved in the assessment?</li> </ul>	<p>District Nurses provide residents details to Access Harrow. E &amp; E provide bins and collections</p>					
<p><b>Stage 2: Evidence / Data Collation</b></p>						
<p><b>4.</b> 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.</p>						
<p>Age (including carers of young/older people)</p>	<p>A self-completion survey was delivered to all service users with a post-paid reply envelope attached. The survey was around 7 minutes in length, comprised of a mix of pre-coded and open ended questions. In order for us to continue to provide this service in the most effective way both in terms of cost and service to our users it is imperative that we are aware of the type of waste we collect from our clients.</p>					

	<p>Respondents were asked their ages as an indicator of their potential ability to manage heavier bins.</p> <p>65+ was largest age group with nearly 7 out of 10 (67%) of respondents falling into this age category.</p>
Disability (including carers of disabled people)	<p>Respondents were asked whether their day-to-day activities are limited because of health problems. 9 out of 10 86% are limited and of those 5 out of 10 (48%) were due to mobility issues</p>
Gender Reassignment	<p>There was no indication to suggest that Gender Reassignment was a common characteristic within the service users.</p>
Marriage / Civil Partnership	<p>There is no indication to suggest that Marriage / Civil Partnership is a factor.</p>
Pregnancy and Maternity	<p>There was no Pregnancy issues within the survey.</p>
Race	<p>48% of respondents declared they were White British and 27% Asian. There is no indication to suggest that Race is a factor.</p>
Religion and Belief	<p>There was no indication to suggest that a particular religion or belief is a factor</p>
Sex / Gender	<p>There was no indication to suggest that Sex / Gender is a factor.</p>
Sexual Orientation	<p>There was no indication to suggest that a particular sexual orientation was a factor.</p>
Socio Economic	<p>No specific data collected on a regular basis however feedback provided, indicated that some users would experience difficulty with an extended collection period.</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?
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			(This may include further consultation with the affected groups, revising your proposals).
Service Users	A self-completion survey was delivered to all service users with a post-paid reply envelope attached. The survey was around 7 minutes in length, comprised of a mix of pre-coded and open ended questions.	18% of respondents are disposing of contaminated clinical waste	Waste will continue to be collected on a weekly basis via a NHS framework
		82% of respondents are disposing of incontinence pads which can be incorporated into the normal residual waste stream. We asked these users if they would experience difficulties if collection was converted to a two weekly residual collection. 49% of respondents declared that they would have problems against 42% who said they would not.	Where clients have excessive waste an extra or larger size bin will be provided; to be decided by the waste team in conjunction with the resident.
		65+ was largest age group with nearly 7 out of 10 (67%) of respondents falling into this age category	The new scheme methodology will be distributed to user in a clear to understand leaflet
		9 out of 10 (86%) are limited by disability and of those 5 out of 10 (48%) were due to mobility issues	Clinical waste clients will have no change to the service. Those clients disposing of incontinence pads will be have the clinical waste bin replaced by a residual waste bin and provided with an additional bin to facilitate fortnightly collection. Clients can be offered an assisted collection where applicable.
<b>6.</b> What other (local, regional, national research, reports, media) data sources that you have used to inform this	N/a		

assessment?  
List the Title of reports / documents and websites here.

**Stage 3: Assessing Potential Disproportionate Impact**

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

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

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

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

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

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

**Stage 4: Collating Additional data / Evidence**

8. What additional data / evidence have you considered in relation to your proposals as a result of the analysis at Stage 3?  
  
(include this evidence, including any data, statistics, titles of documents and website links here)

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

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different 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.  <b>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9</b>	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)	✓		65+ was largest age group with nearly 7 out of 10 (67%) of respondents falling into this age category	The new scheme methodology will be distributed to users in a clear to understand leaflet.  Where clients have excessive waste a larger size bin will be provided, following discussion with the Waste Team
Disability (including carers of disabled people)	✓		9 out of 10 (86%) are limited by disability and of those 5 out of 10 (48%) were due to mobility issues	Those clients disposing of incontinence pads will have the clinical waste bin replaced by a residual waste bin provide with an additional bin to facilitate fortnightly collection.  Where clients have excessive waste a larger size

				bin will be provided, following discussion with the Waste Team				
Gender Reassignment								
Marriage and Civil Partnership								
Pregnancy and Maternity								
Race								
Religion or Belief								
Sex								
Sexual orientation								
<b>11. Cumulative Impact</b> – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative				<table border="1"> <tr> <td>Yes</td> <td></td> <td>No</td> <td><b>X</b></td> </tr> </table>	Yes		No	<b>X</b>
Yes		No	<b>X</b>					

impact on a particular Protected Characteristic?

If yes, which Protected Characteristics could be affected and what is the potential impact?

**11a. Any Other Impact** – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity, welfare reform, unemployment levels, community tensions, levels of crime) could your proposals have an impact on individuals/service users socio economic, health or an impact on community cohesion?

If yes, what is the potential impact and how likely is to happen?

Yes		No	<b>X</b>
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**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	X	x	X	X	x	x	X	x	x

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.

<b>Outcome 2</b> – 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>	X
<b>Outcome 3</b> – 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. <b>(Explain this in 13a below)</b>	
<b>Outcome 4</b> – 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)	
<b>13a.</b> If your EqIA is assessed as <b>outcome 3 or you have ticked 'yes' in Q12</b> , 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
Age, Disability	Follow up survey 6 months after instigation of the new scheme to identify any potential impacts and consider mitigations	Monitor service Requests with report to Environmental Services Delivery DMT	June 2015	Alan Whiting	N/A

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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.

<b>15.</b> 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>	Follow up survey 6 months after instigation of the new scheme to identify any potential impacts and consider mitigations
<b>16.</b> How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	Monitor service Requests with report to Environmental Services Delivery DMT
<b>17.</b> Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	

**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

**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.**

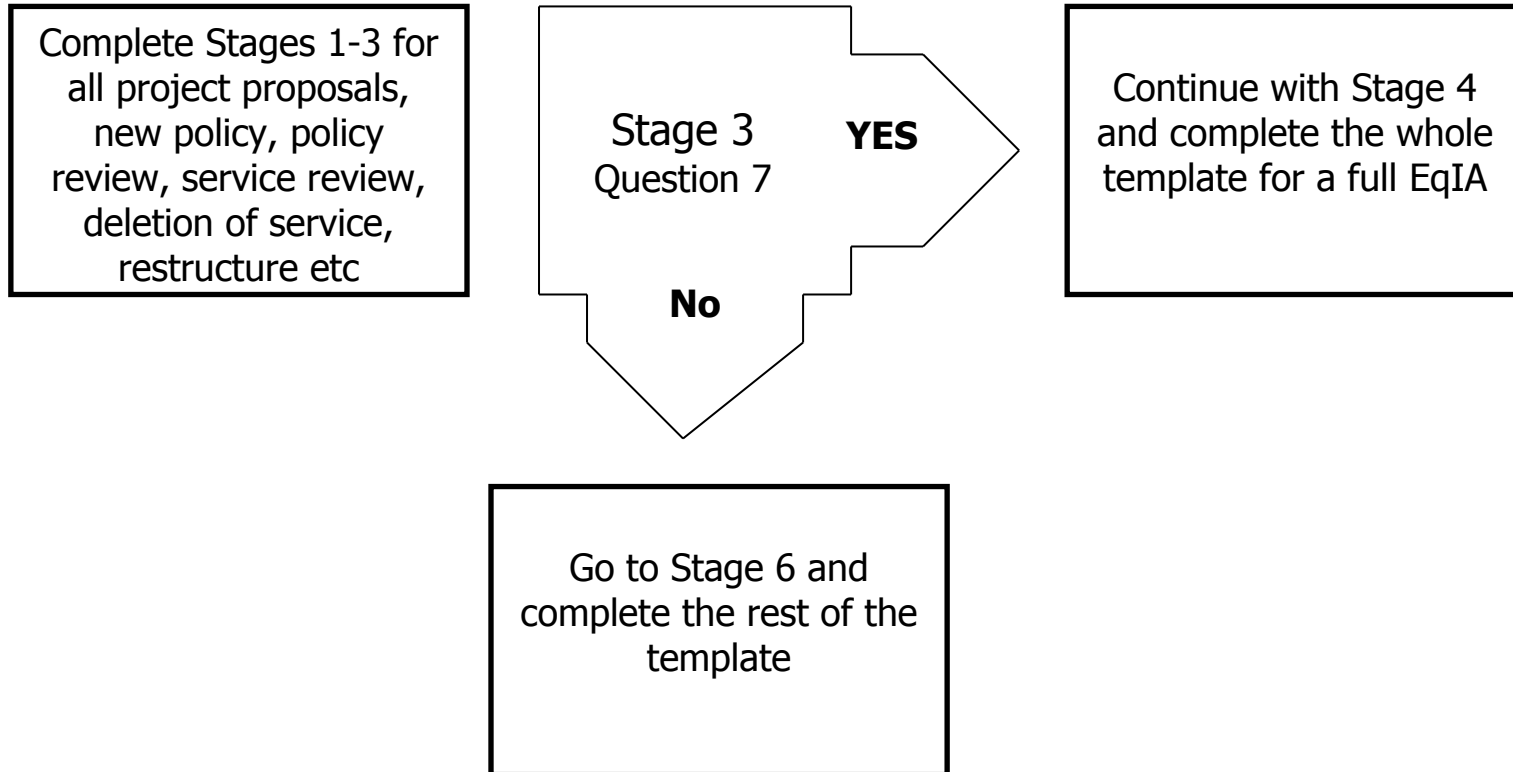
<b>19.</b> Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	
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Signed: (Lead officer completing EqIA)	Alan Whiting	Signed: (Chair of DETG)	Paul Nichols
Date:	25 July 2014	Date:	10/11/14
Date EqIA presented at the EqIA Quality Assurance Group		Signature of ETG Chair	



# 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:		E & E E17 Civic Amenity Site - Reduce assistance to the public on the upper level of the Civic Amenity Site from 1st January 2015.			
Directorate / Service responsible:		Environment & Enterprise Waste Service			
Name and job title of lead officer:		Alan Whiting Environmental Service Manager			
Name & contact details of the other persons involved in the assessment:					
Date of assessment:		3 <sup>rd</sup> July 2014			
<b>Stage 1: Overview</b>					
<b>1. What are you trying to do?</b>  (Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)		To reduce the current level of assistance at non peak times.  It is proposed to re-allocate and target resource to peak times to ensure adequate assistance to the public is maintained during this period.			
<b>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</b>		Residents / Service Users	X	Partners	
		Staff	X	Age	
		Gender Reassignment		Marriage and Civil Partnership	
		Race		Religion or Belief	
				Stakeholders	
				Disability	
				Pregnancy and Maternity	
				Sex	

	Sexual Orientation		Other	
<p><b>3.</b> Is the responsibility shared with another directorate, authority or organisation? If so:</p> <ul style="list-style-type: none"> <li>Who are the partners?</li> <li>Who has the overall responsibility?</li> <li>How have they been involved in the assessment?</li> </ul>	The responsibility for the site comes under Waste Services part of Environment and Enterprise			

## 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)	Site staff are aware of the peak and non peak times to ensure that adequate assistance when required is provided to site users on the upper level. Site users on the upper level are car users depositing waste at the site and there is nothing to suggest one or more protected characteristics will be disproportionately affected. Signage is prominent and staff will continue to be available to assist where required and answer user queries.
Disability (including carers of disabled people)	
Gender Reassignment	
Marriage / Civil Partnership	
Pregnancy and Maternity	
Race	
Religion and Belief	

Sex / Gender			
Sexual Orientation			
Socio Economic			
<b>5. What consultation have you undertaken on your proposals?</b>			
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).
A self-completion survey was carried out from 04 October – 20 October 2014. The Community Engagement team distributed questionnaires at the Civic Amenity site, and this was completed by site visitors	The survey asked users to rate the current service as the savings proposal requires a reduction in staffing levels. The users were targeted based on those who visited while the reduction in staffing was in place as a trial	90% of all respondents stated that the staff assistance on site was good to very good and that staff had a good attitude	Reduced staffing levels are judged to be good and adequate for users of the site. No specific protected characteristic issues were identified.
Site staff have been made aware of the need to target resources at peak times to ensure that the operational requirements of the site are continued.	Discussions with staff.	N/a	N/a
<b>6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?</b>  List the Title of reports / documents and websites here.	N/a		

**Stage 3: Assessing Potential Disproportionate Impact**

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

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

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

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

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

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

#### Stage 4: Collating Additional data / Evidence

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

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

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

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different 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.  <b>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9</b>	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				
<b>11. Cumulative Impact</b> – 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	
<b>11a. Any Other Impact</b> – Considering what else is happening within the Council and Harrow as a whole (for example national/local policy, austerity,	Yes		No	

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?

**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)

<b>Outcome 1</b> – 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
<b>Outcome 2</b> – 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>	
<b>Outcome 3</b> – 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. <b>(Explain this in 13a below)</b>	



<b>Outcome 4</b> – 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)	
<b>13a.</b> If your EqIA is assessed as <b>outcome 3 or you have ticked 'yes' in Q12</b> , 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.

<b>15.</b> How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to	Staff will be on site to monitor usage and note any issues. If issues are found, a review will be conducted.
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ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	
<b>16.</b> How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	Ongoing review will be shared with the PH.
<b>17.</b> 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

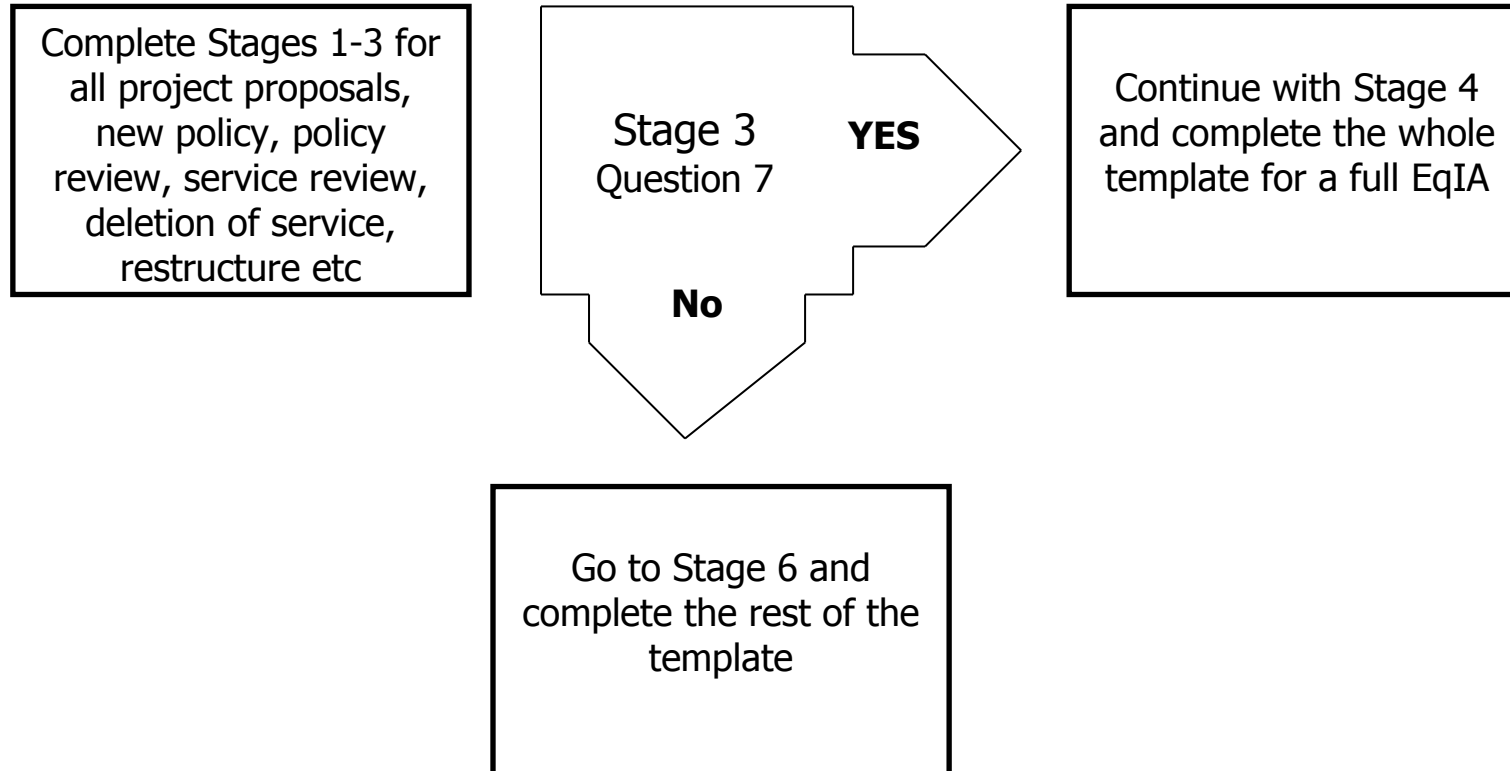
### Stage 10 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)

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

<b>19.</b> Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?			
Signed: (Lead officer completing EqIA)	Alan Whiting	Signed: (Chair of DETG)	Paul Nichols
Date:	25 July 2014	Date:	
Date EqIA presented at the EqIA Quality Assurance Group		Signature of ETG Chair	

# 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 <input checked="" type="checkbox"/>		Other	
Title of Project:		E & E E18 Responsive zonal street cleaning for residential streets.	
Directorate / Service responsible:		Environment and Enterprise, Harrow Pride	
Name and job title of lead officer:		Mick Wynne	
Name & contact details of the other persons involved in the assessment:			
Date of assessment:		03/07/14	

## Stage 1: Overview

<p><b>1. What are you trying to do?</b></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>Harrow Pride currently provides street cleansing services to all Harrow managed highway, currently on a daily basis for shopping areas and a 4 weekly cleansing cycle for residential streets. The objective of the introduction of a zonal approach to street cleansing review is to achieve financial savings within the current street cleansing budget of £45,000 for 14/15 and £127,000 for 15/16</p> <p>The service will carry out a reduction in sweeping frequencies, with an emphasis on consistent and appropriate management of an area to keep it clean, rather than the current cyclical approach, which does not necessarily reflect the need for cleansing, delivering the required savings by cutting out unnecessary over-sweeping and cleansing and by redistributing cleansing resources across the borough. This will provide a more efficient and cost-effective street cleansing operation that will deliver a greater value-for-money service to both the council and</p>
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ultimately, the tax payer

Of Key importance to this work is to ensure that classification of areas into zonal categories and the management of resources to deliver this are appropriately managed and reviewed to ensure that there is a minimum resource retained and deployed to deliver a statutorily 'acceptable' level of street cleanliness given Harrow's duties under sections 89 (1) and (2) of the Environmental Protection Act 1990

Work is ongoing on establishing zones – if a particular zone is identified to be skewed to disadvantage one of these protected characteristics, we will take into account when finalising zones

<b>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</b>	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?

The responsibility for service lies with Enterprise & Environment, Harrow Pride

**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)	This is a borough wide initiative. Reviewing Harrow census data indicates a significant number of elderly people in the borough who may be disproportionately disadvantaged. See below for implications.
Disability (including carers of disabled people)	This is a borough wide initiative. Reviewing Harrow census data indicates a number of disabled people in the borough who may be disproportionately disadvantaged. See below for implications.
Gender Reassignment	
Marriage / Civil Partnership	
Pregnancy and Maternity	
Race	
Religion and Belief	
Sex / Gender	
Sexual Orientation	
Socio Economic	

**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>Community Champions which provide an indicative cross section of the population of Harrow</p>	<p>An online survey supported by self-completion questionnaires was undertaken through the Community Champion network and a final sample size of 222 was achieved. The Community Engagement team publicised the web-link through the Champions network. The survey was around 10 minutes in length, comprised of a mix of pre-coded and open ended questions.</p>	<p>The survey asked respondents to rate the current level of service, state their agreement to a zonal approach to street cleaning and state the area of priority. The results were:</p> <ul style="list-style-type: none"> <li>• 65% satisfaction with the current service</li> <li>• 60% support a zonal approach</li> <li>• 85% stated that shopping centres would be first priority followed by areas of known for excessive littering and areas of high footfall.</li> </ul>	<p>Consultation feedback has identified key priorities for zonal cleaning have directed mitigations.</p>
<p>Unions, staff and the public will be fully consulted as part of this process</p>	<p>A full consultation process involving staff affected by the proposals and the public will be followed. The full consultation method is to be confirmed</p>		<p>Consideration will be given to any potential impact raised as part of the consultation process</p>
<p><b>6.</b> 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>			

**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**

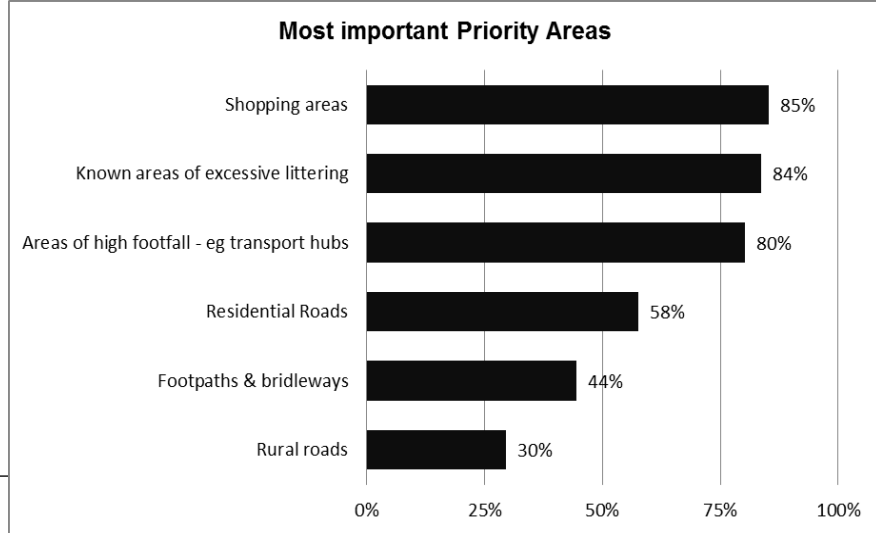


Work is ongoing on establishing zones – if a particular zone is identified to be skewed to disadvantage one of these protected characteristics, we will take into account when finalising zones

Respondents were also asked to rate priority areas in terms of importance, if there was a reduction in highway reactive works and priority areas needed to be identified. **Shopping areas, Areas of excess littering and High footfall areas** were the most important priority areas (over 80%), followed by **residential roads**.

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)



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**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).
Unions, staff and the public will be fully consulted as part of this process prior to implementation.	A full consultation process involving staff affected by the proposals and the public will be followed. The full consultation method is to be confirmed		Consideration will be given to any potential impact raised as part of the consultation process

**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.  <b>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9</b>	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)	✓		Possibility that the reduced cleansing frequency in some areas may affect older people and those with mobility impairments and/or impaired vision	43% of respondents were of the 65+ age group and have had a positive impact on priorities for a zonal cleaning regime.  There will remain rapid response teams who will be able to address fly tips and unacceptably excessive amounts of litter and other debris in between any scheduled cleansing operation, maintaining the existing SLA time for addressing such issues
Disability (including carers of disabled people)	✓		Possibility that the reduced cleansing frequency in some areas may affect people in wheelchairs and/or people with other mobility impairments and/or those with visual impairments.  6% of respondents declared mobility disablement	There will remain rapid response teams who will be able to address fly tips and unacceptably excessive amounts of litter and other debris in between any scheduled cleansing operation, maintaining the existing SLA time for addressing such issues
Gender Reassignment		✓	the impact on this equality group would be <b>neutral</b>	
Marriage and Civil Partnership		✓	the impact on this equality group would be <b>neutral</b>	

Pregnancy and Maternity		✓	the impact on this equality group would be <b>neutral</b>	
Race		✓	the impact on this equality group would be <b>neutral</b>	
Religion or Belief		✓	the impact on this equality group would be <b>neutral</b>	
Sex		✓	the impact on this equality group would be <b>neutral</b>	
Sexual orientation		✓	the impact on this equality group would be <b>neutral</b>	
<b>1. Cumulative Impact</b> – 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

	<p>The potential negative impacts can be justified when the proposed mitigating steps are considered.</p> <p>Harrow's current street cleansing service provides for: the removal of all litter and debris from streets and paths and other areas adjoining the public highway and the collection of leaf fall.</p> <p>The requirement to make financial economies is likely to impact the frequency at which some aspects of street cleansing are provided. Although the zonal cleansing approach will look to utilise resources more effectively through a targeted approach to cleansing frequencies, the reduction in scheduled cleansing visits to some parts of the borough could potentially result in a greater accumulation of litter, debris, flytips, and other obstructions on the public highway which may detrimentally and disproportionately impact upon older people, people with mobility impairments and/or people with impaired vision. An increase in litter and debris may also increase the likelihood of slips, trips and falls in the borough.</p> <p>As mitigating steps against these potential impacts, there will remain rapid response teams who will be able to address fly tips and unacceptably excessive levels of litter and other debris in between any scheduled cleansing operation. In addition, the Council will be introducing enforcement measures to tackle anti social behaviour such as littering, which should minimise obstructions, improve the street scene and enhance local environmental.</p>			
<p><b>11a. Any Other Impact</b> – 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?</p> <p>If yes, what is the potential impact and how likely is to happen?</p>	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)

<b>Outcome 1</b> – 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.	
<b>Outcome 2</b> – 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>	✓
<b>Outcome 3</b> – 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. <b>(Explain this in 13a below)</b>	
<b>Outcome 4</b> – 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
<p><b>Disability &amp; Age</b></p> <p>Possibility that the reduced cleansing frequency in some areas may affect people in wheelchairs and/or people with other mobility impairments and/or those with visual impairments</p>	<p>Retention of Rapid Response teams to be able to respond to service requests relating to excessive littering, debris or fly tipping to allow for removal within the current SLA of 24 hours</p>	<p>The Collective system captures all service requests and is used to monitor the response time to rectify. The retention of Rapid Response teams will allow the service to maintain its current performance</p>			

### 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><b>15.</b> 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>As well as in house monitoring through the creation of random inspections via the Collective system, further monitoring of street cleansing performance is undertaken by an independent external body on 3 occasions per year.</p>
<p><b>16.</b> 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>A full breakdown of performance, causes of litter, land class performance is provided as part of the external monitoring and assessment of cleansing performance. The classification of areas into</p>

	zones is not rigid and, if data suggests that the classification of an area into a particular zone disproportionately affects one of the protected groups, this will be reviewed and appropriate adjustments made.
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**17.** Have you received any complaints or compliments about the proposals being assessed? If so, provide details.

Proposals are due for public consultation

**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

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

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

**19.** Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?

Signed: (Lead officer completing EqIA)	Mick Wynne	Signed: (Chair of DETG)	Paul Nichols
Date:	10/11/14	Date:	10/11/14
Date EqIA presented at the EqIA Quality Assurance Group		Signature of ETG Chair	