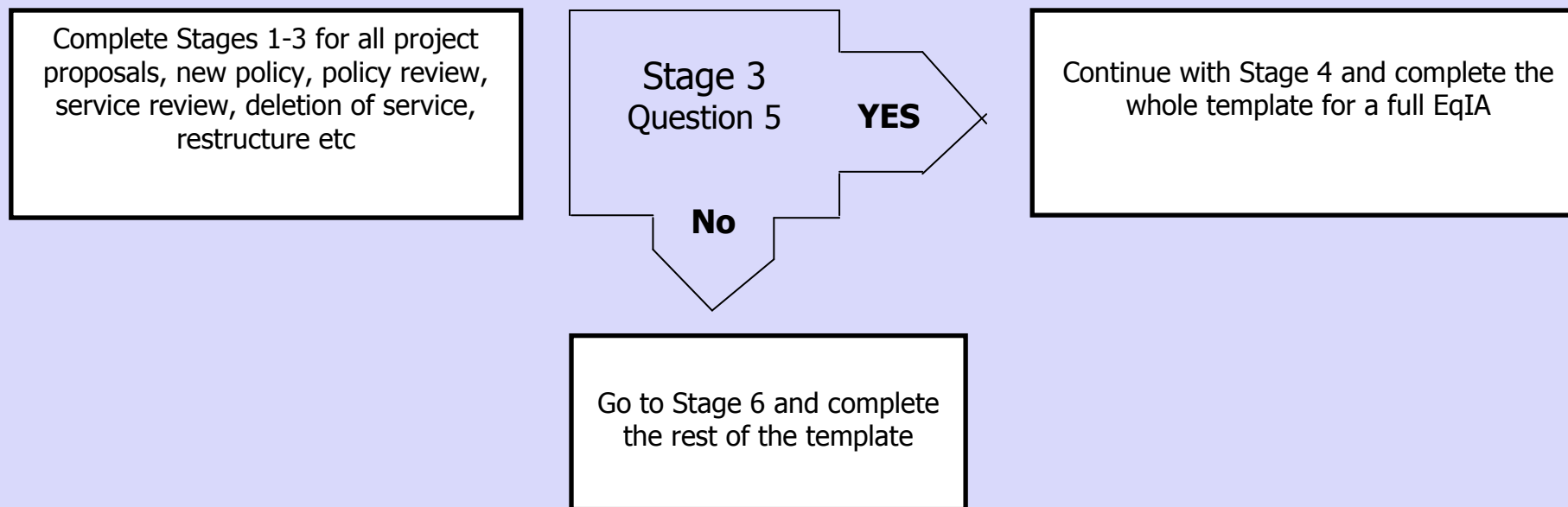


Equality Impact Assessment Template **APPENDIX 2**

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



- In order to complete this assessment, it is important that you have read the Corporate Guidelines on EqIAs and preferably completed the EqIA E-learning Module.
- You are also encouraged to refer to the EqIA Template with Guidance Notes to assist you in completing this template.
- **SIGN OFF:** All EqIAs need to be signed off by your Directorate Equality Task Groups. EqIAs relating to Cabinet Reports need to be submitted to the EqIA Quality Assurance Group at least one month before your Cabinet Report date. This group meets on the first Monday of each month.
- Legal will NOT accept any reports without a fully completed, Quality Assured and signed off EqIA.

The EqIA Guidance, Template and sign off process is available on the Hub under Equality and Diversity

Equality Impact Assessment (EqIA) Template

Type of Decision: Tick ✓	<input type="checkbox"/>	✓ Cabinet	<input type="checkbox"/>	✓ Portfolio Holder(s)	<input type="checkbox"/>	Other (explain)	
Date decision to be taken:	24 May at Cabinet plus further report scheduled for September Cabinet						
Value of savings to be made (if applicable):	Not applicable						
Title of Project:	Watkins House, Woodlands Road, HA1 2RS						
Directorate / Service responsible:	Housing						
Name and job title of Lead Officer:	Karen Connell, Head of Resident Services Alison Pegg, Head of Housing Regeneration						
Name & contact details of the other persons involved in the assessment:	Peter Mulloy, Project Manager for Watkins House Tel 077 9214 7504 Peter.Mulloy@harrow.gov.yk						
Date of assessment (including review dates):	3 March 2016 , 22 March 2016, 5 April 2016, 4 May 2016						

Stage 1: Overview

<p>1. What are you trying to do?</p> <p>(Explain your proposals here e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)</p>	<ul style="list-style-type: none"> • Watkins House is HRA Housing stock in HA1 – Greenhill Ward. The Housing comprises 43 bedsit homes (with one additional bedsit as a guest room) and is an extra care/supported living housing scheme for older people – many of whom have quite complex support, care and health needs. The scheme provides on site housing support and personal care to levels that would be individually assessed for each resident. The residents have been granted Secure Tenancies under housing law. • The Housing Service has concerns over the standard of accommodation that the Council provides at this location. The scheme is outdated especially in the context of the bed-sit accommodation that is provided. Equally, more modern establishments provide an array of facilities and services that enhance the quality of life for older people – promoting personal independence and celebrating age. • The Council does not have the scale of capital funding either in the HRA or the GF to consider significant capital improvements towards a modernisation agenda for the scheme – both for the communal areas and for individual homes. The past 5-10 years have seen limited use of capital in asset management improvement programmes – windows; front entrance doors; bathroom refurbishment – but although welcome these have not addressed the
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fundamental problems on design and space standards in the homes of residents as well as poor quality communal areas. In a housing scheme of this nature, the new design regulations place a proper emphasis on space and high quality design for an older persons population, and this for individual homes and for communal areas. In short, Watkins House falls well short on both of these aspects.

- In November 2015, the Divisional Director of Housing set up a corporate Project Board for Watkins House in view of a range of concerns of the housing scheme. In terms of the housing design and standards, it is the clear view of the Project Team that housing options should be reviewed for the site. Three main options have emerged. 1) No change 2) Remodel housing and communal areas in a phased approach 3) the building should be demolished and new housing built on the same site. That third option will require a) Tenants to be offered alternative and better housing accommodation with a “Right of Return” to the new homes if requested by the Tenant b) the sale/transfer of the HRA Land to another organisation, likely a Housing Association. The new organisation would agree design principles, gain Planning approval, demolish, tender and build new homes on the site to the latest modern standards in this type of Housing. The Housing Association would become the owner of the Land through a Land Disposal and Sale agreement with the Council. The costs for the new housing development for older people would be borne by the selected Housing Association or partially gained through funding from the GLA. The Council will gain and retain 100% nomination rights to the new homes.
- Cabinet on the 24 May is being advised of all three options and at this stage – no option has been selected. Cabinet is being asked to agree continuation of consultation on all three options with Residents, Carers and nominated Family members. A further report will be prepared for a future Cabinet (likely to be September) advising on the outcome of consultation and in particular views of Residents on all options and any not yet considered. Taking into account the views of Residents, Family members and Carers – Cabinet may select one of those three options.
- This is a long term project and under current estimates the project plan will require 4 years for the new homes to be built and let – if option 3 was ultimately chosen.
- There will be an impact on Staff if the proposals go ahead – most especially with regard to options 3. This is centred on the LB Harrow Care Staff who provide

	<p>Care services on site and the likely impact is that they may be considered for a transfer to the new organisation under TUPE – Transfer of Undertakings Protection of Employment regulations.</p> <ul style="list-style-type: none"> Should any option proceed that may require Tenants to move - . all of the Secure Tenants will be offered funding that is part statutory and part discretionary and this will encompass: <ul style="list-style-type: none"> a) Home Loss payment of £5,300 (statutory) b) Disturbance payment (statutory but some operational discretion by Council) c) Service of Removal Contractor (operational discretion) d) Removal assistance with packing/preparing for the move and unpacking/settling into a new home (operational discretion) e) Post being transferred to any new address (operational discretion) f) Disconnections/reconnections of utilities and home services (operational discretion) g) A settling-in service – through at least two home visits and services from Housing Support (operational discretion) The Council will also offer a “Right of Return” to all Residents/Secure Tenants to new homes if they wish to accept the option. Some Residents may be able to be rehoused direct into new homes as the build is phased. In May, Cabinet will be asked to note the current options and agree a programme of suitable, fit-for-purpose, and commensurate consultation with Residents, Families and Carers. 					
<p>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</p>	Residents / Service Users	✓	Partners	✓	Stakeholders	✓
	Staff	✓	Age	✓	Disability	✓
	Gender Reassignment	✓	Marriage and Civil Partnership	✓	Pregnancy and Maternity	✓
	Race	✓	Religion or Belief	✓	Sex	✓
	Sexual Orientation	✓	Other			
<p>3. Is the responsibility shared with another directorate, authority or organisation? If so:</p>	<p>People Services</p>					

<ul style="list-style-type: none"> • Who are the partners? • Who has the overall responsibility? • How have they been involved in the assessment? 	<p>At present, for an agreed temporary period of six months from January 2016, the Care Service at Watkins House is managed through Adult Social Services. The overall responsibility for the Housing Scheme rests with the Divisional Director of Housing – Lynne Pennington.</p> <p>The EQIA assessment has been agreed by a sub-group of the Watkins House Project Board – with representation from Housing, Adult Social Services prior to formal sign-off at the main Watkins House Project Board.</p>
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Stage 2: Evidence & Data Analysis

- 4. What evidence is available to assess the potential impact of your proposals? 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, press reports, letters from residents and complaints etc. Where possible include data on the nine Protected Characteristics.
- (Where you have gaps (data is not available/being collated for any Protected Characteristic), you may need to include this as an action to address in your Improvement Action Plan at Stage 6)

Protected Characteristic	Evidence	Analysis & Impact
Age (including carers of young/older people)	<ul style="list-style-type: none"> • From Resident Profile at Watkins House • From Staff Profile of Care Staff at Watkins House <p>Further work is being completed on these Profiles that will last for the lifetime of the Project – if Cabinet approves the recommendations on the 24 May.</p>	<ul style="list-style-type: none"> • The Residents at Watkins House are all Older People and many have quite complex Health, Support and Care Needs. The majority would be deemed to be vulnerable due to age related health and mobility problems. The Health context relates to physical and mental health. Most residents will have Family support or support provided by Carers. The evidence to assess the impact of the proposals is contained in a confidential assessment of the Residents that provides an anonymised review of the Resident profile and this linked through to the nine protected characteristics. • The impact on the Residents stems from the fact they are in a settled housing environment that provides support and care. If the Council ultimately agrees to a strategic change agenda for Watkins House, especially through option 3 – the Council

		<p>would be required to offer Residents an alternative home (plus the Council has agreed a “Right of Return” to the new homes on site) and a package of measures to take account of the issues on vulnerability and in essence to meet the requirements of the Public Sector Equality Duty (PSED).</p> <ul style="list-style-type: none"> • There is a Staff Profile for the Care Staff at Watkins House and their current employment would be at risk if option 3 was approved by Cabinet as the strategic agenda. • The potential impact on LB Harrow staff providing Care Services at the housing scheme would be that (under option 3 if ultimately approved) they may be considered for transfer to the potential Housing Association under the arrangements to dispose of the land to another Service organisation to enable funding of new homes built to modern design standards. This would be considered under TUPE – Transfer of Undertakings Protection of Employment – regulations.
Disability (including carers of disabled people)	<ul style="list-style-type: none"> • See above 	<ul style="list-style-type: none"> • See above – there are a proportion of Residents at Watkins House who are disabled.
Gender Reassignment	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> •
Marriage / Civil Partnership	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> •
Pregnancy and Maternity	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> •
Race	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> •
Religion and Belief	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> •
Sex / Gender	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> •
Sexual Orientation	<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> •
Stage 3: Assessing Potential Disproportionate Impact		
5. 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	Yes	Yes							
No			No	No	No	No	No	No	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 6

Stage 4: Further Consultation / Additional Evidence

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

On the 24 May Cabinet is being requested to approve further and more extensive consultation with Residents plus Carers and Families on the three housing options for Watkins House..... *“Consultation with Residents, Family members and Carers is a fundamental element of the proposals for Watkins House. There has been some preliminary consultation with Residents, Carers and Family Members and further consultation is planned based on the three options in this report. The consultation should be commensurate and fit for purpose in the context of the residents at Watkins House taking into consideration their age, health and capacity to give views that must be recorded and fed back to the decision maker. Officers have been working with colleagues in the communications team to ensure that information is provided to residents to allow them to understand the proposal and the potential impact on them. Residents will have access to independent advisory/advocacy services to assist them in the consultation process. Residents will be able to present alternative options should they wish. The outcome of the consultation at this stage will be presented to Cabinet in a follow-up report on Watkins House.”*

This EqIA should be considered as interim until that consultation process is fully completed, evidenced and reported back to a future Cabinet – likely to be the September Cabinet.

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? E.g. revising your proposals

Stage 5: Assessing Impact

7. What does your evidence tell you about the impact on the different Protected Characteristics? Consider whether the evidence shows potential for differential impact, if so state whether this is a positive or an adverse impact? If adverse, is it a minor or major impact?

Protected Characteristic	Positive Impact ✓	Adverse Impact		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 7	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 6)
		Minor ✓	Major ✓		
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					
8. Cumulative Impact – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic? If yes, which Protected Characteristics could be affected and what is the potential impact?	Yes		No		
9. Any Other Impact – Considering what else is happening within the	Yes		No		

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 it to happen?

Stage 6 – Improvement Action Plan

List below any actions you plan to take as a result of this Impact Assessment. These should include:

- Proposals to mitigate any adverse impact identified
- Positive action to advance equality of opportunity
- Monitoring the impact of the proposals/changes once they have been implemented
- Any monitoring measures which need to be introduced to ensure effective monitoring of your proposals? How often will you do this?

Area of potential adverse impact e.g. Race, Disability	Proposal to mitigate adverse impact	How will you know this has been achieved? E.g. Performance Measure / Target	Lead Officer/Team	Target Date
			Watkins House Project Board Project Manager Peter Mulloy Peter.Mulloy@harrow.gov.uk Lead Officer Karen Connell Head of Resident Services Community Directorate Civic Centre 1 Middx Floor, South Wing 020 8416 8660	

			Ext 8660 Email: karen.connell@harrow.gov.uk	

Stage 7: Public Sector Equality Duty

10. How do your proposals meet the Public Sector Equality Duty (PSED) which requires the Council to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

Stage 8: Recommendation

11. 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 of opportunity are being addressed.	
Outcome 2 – Minor Impact: Minor adjustments to remove / mitigate adverse impact or advance equality of opportunity have been identified by the EqIA and these are listed in the Action Plan above.	
Outcome 3 – Major Impact: Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality of opportunity. 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 Q12 below)	
12. If your EqIA is assessed as outcome 3 explain your justification with full reasoning to continue with your proposals.	

Stage 9 - Organisational sign Off			
13. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	The Watkins House Project Board – interim EqIA agreed at May meeting of the Project Board.		
Signed: (Lead officer completing EqIA)	Karen Connell/Peter Mulloy	Signed: (Chair of DETG)	██████████
Date:	22 March 2016 06 April 2016 4 May 2016	Date:	9 May 2016
Date EqIA presented at the EqIA Quality Assurance Group (if required)	N/A	Signature of DETG Chair	██████████