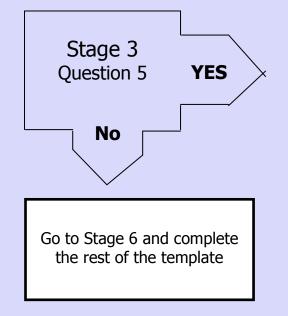
# Equality Impact Assessment Template APPENDIX 2

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.

Complete Stages 1-3 for all project proposals, new policy, policy review, service review, deletion of service, restructure etc



Continue with Stage 4 and complete the whole template for a full EqIA

- 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 Imp	Equality Impact Assessment (EqIA) Template							
Type of Decision: Tick ✓	✓ Cabinet ✓ Portfolio Holder(s) Other (explain)							
Date decision to be taken:	13 October Cabinet – follows on from an initial EqIA at the 24 May 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, 4 August 2016, 25 August 2016, DESG 22 September 2016, Watkins House Project Board 22 September 2016							
Stage 1: Overview								
1. What are you trying to do?  (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)	<ul> <li>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.</li> <li>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.</li> <li>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</li> </ul>							

- refurbishment but although welcome these have not addressed the 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 strategic 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 though 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 was advised of all three options and at that stage no option had been selected. Cabinet agreed continuation of consultation on all three options with Residents, and with nominated family members and any appointed carers. Cabinet on 24 May also agreed the service of a statutory Proposals Notice allowing for a formal consultation period with residents as required under law and in relation to their secure tenancies. This report to the 13 October Cabinet will advise on the results 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 4-5 years for the new homes to be built and let – if housing option 3 was

- approved by Cabinet.
- There will be an impact on LB Harrow Staff providing care services at Watkins House if the proposals go ahead most especially with regard to housing option 3. The impact is that their jobs are at risk of redeployment/redundancy. Staff and Trade Unions have been kept regularly informed of the proposals for Watkins House and the potential impact of each of the proposed housing options. At this stage, this has been advice/guidance as formal consultation will only commence when Cabinet makes a decision on the strategic housing option for Watkins House.
- 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:
- 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 agreed to note those three housing options and agreed delegation to officers for a programme of suitable, fit-for-purpose, and commensurate consultation with Residents, Families and Carers.
- Age UK Harrow was commissioned to carry out the actual consultation with Residents, family members and carers. They have the required expertise and qualifications in working with older people – and being able to advocate in situations where the capacity of the older person as Resident – Secure Tenant may be limited due to age; health and other vulnerability factors. The involvement of Age UK Harrow also has allowed some distance from council staff in the actual consultation process with each Resident on a 121 basis. This has brought some independence into the process. The consultation ended in

	mid-August and Cabinet in October will have sight of the Consultation report and as the decision-maker is required to note the results of consultation in reaching any decision.					
	Residents / Service Users	✓	Partners	<b>✓</b>	Stakeholders	<b>✓</b>
	Staff	✓	Age	✓	Disability	✓
2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)	Gender Reassignment	✓	Marriage and Civil Partnership	<b>✓</b>	Pregnancy and Maternity	✓
	Race	✓	Religion or Belief	<b>✓</b>	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?

#### People Services

At present, from January 2016, the Care Service at Watkins House is managed through Adults, Community Care Team. The overall responsibility for the Housing Scheme rests with the Divisional Director of Housing – Lynne Pennington.

The EQIA assessment has been agreed by the Watkins House Project Board – with representation from Housing, Adults Community Care team, Legal, Finance, prior to formal review by the DESG – the Departmental Equalities Steering Group.

### 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)	From Resident Profile at Watkins House From Staff Profile of Care Staff at Watkins House Further work has been completed on these Profiles that will last for the lifetime of the Project – if Cabinet agrees the basis of housing option 3 – meaning decant of residents and demolition/rebuilding of new homes.	<ul> <li>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 have Family support. The evidence to assess the impact of the proposals is contained in a confidential assessment of the Residents that provides a comprehensive review of the Resident profile and this linked through to the nine protected characteristics. This is maintained and updated under controlled password protected data conditions.</li> <li>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 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).</li> <li>There is a Staff Profile for the Care Staff at Watkins House and their current employment would be at risk of redundancy if option 3 was approved by Cabinet as the strategic agenda. The staff profile notes that all Care staff are female and one staff member is registered disabled.</li> <li>Housing Options 1 and 2 do not carry the impact of change that option 3 has – housing option 1</li> </ul>

Disability (including carers of disabled people)	See above	effectively means "no change" and housing option 2 advocates a much slower pace of change over 5-10 years that would not carry the same degree of effect on jobs and both would not require that Tenants would have to move.  • See above – there are a proportion of Residents at Watkins House who are disabled as evidenced from the Resident profile. There is one staff member who is registered disabled.
Gender Reassignment	•	N/A
Marriage / Civil Partnership	•	N/A
Pregnancy and Maternity	•	N/A
Race	•	N/A
Religion and Belief	•	N/A
Sex / Gender	The gender of the Care staff at Watkins House is 100% female.	The analysis and impact is that Care staff are at risk of redeployment/redundancy. The Care sector has changed in recent years as private care arrangements have increased due to the increasing age profile of the population. Pay and terms/conditions in many parts of the sector do not match those in the public sector. Equally, pension provision is not as beneficial to employees. There are vacancies for skilled and experience staff in the sector but this would potentially be at the expense of pay, terms and conditions. Being at risk of redeployment/redundancy will be a very personal issue and is to a certain extent influenced by age and qualifying years in the local government pension scheme. There may be an adverse impact on younger staff members but each case can only be considered on the issues in relation to each individual.
Sexual Orientation	•	N/A

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						Yes as Care staff at Watkins House are all female	
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

### 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 approved 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 has been updated for the 13 October Cabinet in the context of the completion of the formal consultation process with Residents. The EqIA will need to be monitored on a regular basis by the Watkins House Project Board given the estimated timescale of this project – this is being set for a review every calendar month.

The consultation with Residents as Secure Tenants of the Council was required under housing law and followed the service of a statutory Notice of proposals setting out the three housing proposals to be considered. Under secure data protection; Council officers have compiled an assessment of the key factors (matching the equality implications) in the resident population. That has allowed a targeted and personalised approach to 121 consultations with residents taking into account any age, health or capacity issues and facilitated contact with nominated family members and appointed carers as required in some cases. The 121 consultations have taken place from the position of extensive background preparation at meetings for all residents – allowing detailed knowledge the consultation proposals and the impact of each. Between March and the first week of September 2016, there were six meetings with residents to give the background on the three housing options – this has allowed residents with more limited capacity more time to gain a picture of the overall agenda. In that period, there has also been a display in the common room at Watkins House – on the three housing options and on extra care housing, plus a whiteboard for resident comments.

Age UK Harrow was commissioned in June and briefed on the requirements of the work. The 121 consultation with residents (and with family members/carers as required in some proportion of the cases) by Age UK Harrow commenced formally on Monday 18 July although the caseworker for Age UK Harrow had been present at two meetings with residents prior to that point and been able to introduce herself to most residents.

The evidence of the consultation process – as required under housing law – is contained in a report from Age UK Harrow. In addition to Age and Disability – other impact issues have come to the fore, and these are supplemental to the actual headline consultation results.

Also, data analysis of the resident database has revealed:

- Age Ranges of Tenants
- Heath conditions
- Capacity levels
- Language issues as recognised first and second languages
- · Communication needs
- Housing Support Requirements
- Care Package levels
- Data on involvement of family members and appointed carers, plus "next of kin" details

- Tenants registered as disabled
- Dates of Tenancy at Watkins House

This data is being used to inform and act on the EqIA.

In terms of Staff (and Trade Unions) there have been six advice/consultation sessions since March this year. There is a staff database for care staff that is also kept under controlled password condition as part of the project. This has identified:

- Job titles
- Age Gender
- Disability
- Race Details
- Hours per week worked

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
All of the Residents at Watkins House have been consulted through seven meetings at the housing scheme between March and early September 2016 on the three housing options	Through Age and Disability and including health factors – there are evident concerns about moving home.	It is clear that there will have to be: a) Additional project resources invested in the collation of personal data to support the moves process for each Tenant and that will have to
that are being proposed for Watkins House. Family members have also been contacted and invited to meetings. A display with Boards has been set up at Watkins House from March 2016. A whiteboard has been installed for Residents	<ul> <li>This mainly centred on the effects of moving:</li> <li>Worry and stress of a move</li> <li>Impact of the loss of the current home and familiar care services and friendship networks</li> </ul>	reach up to settling in and support measures in new homes and new care settings. b) the "right of return" to new homes in a new development will be extended for up to 5 years from the handover date of the new homes — this will allow Tenants a choice process that
to make comments on. The scripts of key points for discussion at meetings have been made available to residents and family members. Formal consultation on the three housing options was undertaken by an independent voluntary organisation with specialist skills in	<ul> <li>Worry about losing current levels of care and support</li> <li>Health factors</li> <li>Financial concerns if rent and ancillary costs rise</li> </ul>	gives them sufficient opportunity to assess their new home against the "right of return" c) A "Charter – Supporting Tenants at Watkins House in Change" will be produced to guarantee service promises to tenants and family members across all of the range of issues in the moves process. This will be

working with older people – by Age UK Harrow in July-August 2016.		signed off at Cabinet level and tenants and family members will have clarity on service promises; standards; particularly in the moves process.  d) Information and consultation will place much more emphasis on the individual tenant – meeting their language needs and best communication option in recognition of their personal circumstances e) There will be closer involvement in the overall project through a steering group of residents and family members f) Visits are planned to housing options for moves in Harrow for residents and family
		members if requested – in advance of any moves.
Staff (and Trade Unions) providing Care services to residents have had six workplace meetings of advice and information on the potential impact of the housing options on their jobs. There have been a series of	There is an impact on Gender as all Care staff are female. One staff member is registered disabled.	If Housing Option 3 is approved – the Council will enter into a formal consultation period with Care Staff using the formal managing change policy and procedure in the Council.
separate briefing meetings with Trade Unions representing staff. Information has been available to staff at meetings. HR staff have been available at three of the meetings to address any specialist employment questions		The Council will take all measures to avoid compulsory redundancies but it may also seek any voluntary redundancy options in a phased approach as the moves process unfolds.
from staff/trade unions. This has been especially the case for option 3 as that presents fundamental changes to staff – and		Further consultation will be in group settings but also on one-to-one level.
also to residents. This is not formal consultation with staff and trade unions as effectively the decision has not been made by the Council but the implications have been fully		The process to select and appoint a Developer fore the new homes will also focus on any measures to mitigate any level of redundancies but this need to be explored further through
set out.		that process.

# 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	Positive Impact		e Impact	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.	What measures can you take to mitigate the impact or advance equality of opportunity?  E.g. further consultation, research, implement				
Characteristic	<b>✓</b>	Minor ✓	Major <b>√</b>	Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 7	equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 6)				
Age (including carers of young/older people)			V	The impact is on moving Tenants to achieve a new housing scheme. There is evidence that the group of Tenants is vulnerable though a range of factors and this is available through an extensive database of the key factors in relation to the Tenants.  Moving vulnerable Tenants will require a very careful approach that must be attuned their personal needs.  The extent of the impact has been fully detailed in the Consultation report from Age UK Harrow and includes these main factors:  • Worry about the moving process  • Getting the right offer of a home/new tenancy suitable to needs of each Tenant  • The prospect of losing personal friendships at Watkins House  • Not knowing where a new home will be  • Concern about any increase in rent  • Concern that Care and Support packages will follow to new tenancy  • Will there be the right food at a new location	There will be: Further consultation  Detailed review of each Tenant's needs Review of this EqIA by the Watkins House Project Board.  The Council will provide service promises or guarantees through a Charter to support Tenants and family members with a range of service standards and clear guarantees in defined areas:  Information  Staff resources dedicated to the Tenants at Watkins House and their needs  Support for family members  Clarity on decisions and the project timelines  Improvements in social activities at Watkins House in the next phase – ensuring that the service does not deteriorate  Independent support through an external specialist Agency working with older people –				

		<ul> <li>Will the Council be able to support each Tenant in the way their personal circumstances require</li> <li>Unsure of the what the offer of a "Right to return" to a new home would mean and how it would apply</li> </ul>	<ul> <li>An extensive range of discretionary support to Tenants in the moving process – arranged transport for viewing and transfers; packing/unpacking; replacement of soft furnishings; free disconnections and reconnections of services; postal redirection for at least 1 year; option of a "befriending service" in new home; fresh care and support plans; assistance with any benefit or welfare support issues; a "right of return" to a new home at Watkins for up to 5 years; and other measures as detailed in the draft "Charter".</li> <li>Involvement in the project in key decisions – for Tenants and family members.</li> <li>Please refer to the draft Charter for fuller details.</li> </ul>
Disability (including carers of disabled people)	√	There is evidence of Disability in the group of Tenants and one staff member – who is at risk of redundancy is registered with a disability.	The specific nature of all disabilities will have a personalised approach for all Tenants and any staff member.
Gender Reassignment			
Marriage and Civil Partnership			
Pregnancy and Maternity			
Race			

Religion or Belief								
Sex				Female gender of all Care Staff		relation to he into formal con the at risk Any measure include discu	et approves the recomposition of the consultation with all State to mitigate will be expressions with the appointake place until q1 of y	Council will enter off and Trade Unions ment/redundancy, xplored and this will off Developer —
Sexual orientation								
8. Cumulative	Impact -	Considerin	g what else	e is happening within the	Yes	√	No	
Council and Har	row as a w	hole, could	your propo	osals have a cumulative	The Council faces in	ncreasing co	osts for care and	services to older
impact on a part	ticular Prote	ected Chara	acteristic?		people. For Age and Disability, the proposals will a level of			
				cumulative impact that will give additional resources over a long term				
If yes, which Protected Characteristics could be affected and what is the potential impact?			period for older peop will have a disability.	le in Harrow	. A proportion of th	nose older people		
9. Any Other I	<b>mpact</b> – C	Considering	what else	is happening within the	Yes <b>√</b>		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?

There is significant evidence that the UK has an ageing society and that older people are living longer but many – as age increases – are living with health factors and that require care and support in later years. There are acknowledged problems in the health service in the discharge of older people from acute care to suitable housing and that impacts on resources and costs. This is evident nationally and in Harrow although there are spatial variations in different parts of UK/England.

Increasing the level of housing with support and care – in a town centre location – for the next generations will have a positive impact in meeting housing need for older people.

The impact on staff needs further review. The care sector is changing though expansion of private care agencies, and access to employment – either through redeployment in the Council or alternative employment in the wider care sector, needs further review.

## 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
Age	If Housing Option 3 was approved, LB	Detailed records would be kept of	Watkins House Project	
Disability	Harrow would have to commit resources to	all moves and residents plus family	Board	Starting in

		I	·	I	I
		gaining an in-depth analysis of the personal	members would be able to	Project Manager	Q4
		transfer details of each resident to facilitate	contribute to personal assessments	Peter Mulloy	2016/2017
		a move to suitable alternative	of the moving and settling-in	Peter.Mulloy@harrow.gov.	as advance
		accommodation.	experience.	<u>uk</u>	decants and
					to be
		The Council would be clear on the level of			completed
		financial, practical, and emotional support		Lead Officer	by end of
		that can be allocated to each resident who		Karen Connell	2017/2018.
		moves. This is outlined in the draft "Charter		Head of Resident Services Community Directorate	Noted that
		– Supporting Residents at Watkins House in		Civic Centre 1	this
		Change"		Middx Floor, South Wing	dependent
				020 8416 8660	on supply
		Contact would be maintained with Residents		Ext 8660 Email:	availability.
		and with family members.		karen.connell@harrow.go	
Ag	e Gender			<u>v.uk</u>	The whole
Di	sability of care		The Watkins House Project Board		project is
sta	aff	The Council will use further consultation	will continue to manage this		defined over
		with Staff and Trade Unions and if housing	project. If option 3 was approved		four years –
		option 3 was agreed – the policies and	- there would be a sustained focus		the impact
		procedures in "Managing Change" would be	on this aspect of the project –		on staff will
		brought into the discussion. The formal	starting with the formal		be most
		process of consultation has not yet started	consultation with staff and trade		considered
		with staff and trade unions as the decision	unions.		in the next
		on housing option has yet to be made at the			two years.
		time of drafting this version of the EqIA.			,
		All measures to mitigate the level and scale			
		of redundancies would be considered.			
		Discussions on this aspect would take place			
		with the appointed Developer.			
			•		

## 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

The proposals under housing option 3 are designed to create new housing for older people in Harrow. They will meet the PSED in terms of 2 and 3). This will be central to the Project in meeting the housing needs, plus support and care needs as required – from the basis of equality of opportunity as age/disability is seen as impacting on all residents in the borough – looking at population trends. The ability to foster good relations between people from different groups will represent a huge opportunity for the new housing and ancillary services – for the next generations in the borough.

The final outcome should be positive for all Residents and can give the Council access to a well designed housing scheme for the present and future generations in Harrow.

If the project proceeds under housing option 3 to completion, the borough will gain 60-65 new 1 bedroom homes with high quality internal and external facilities for older people all built to agreed modern design standards. This should represent an increase of 50% of homes from 43 outdated bed-sits with very cramped living conditions and very poor and limited communal facilities – representing a town centre development for older people that would be available for future generations of older people.

### 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.

The proposals are challenging in that current Residents as Secure Tenants will have to move to new homes to allow demolition and rebuilding to modern design and architectural standards for new homes on the two sites at Watkins. This must be handled sensitively to the Residents/Tenants as a group but also highly attuned in a personal sense to any age related physical, mental health or emotional needs of Residents – including any definitions of Disability. The justification for continuing is that all current Residents will be offered a "Right of Return" and a package of financial and practical support as stated in Section 1, to the new homes. The Council – working through a Housing Association as the recipient of the land sale/transfer arrangement - will secure vastly improved housing and ancillary services for older people on the Watkins House site that may be seen as a state of the art approach for older people in the borough serving new generations of older people in years to come. The "Right of Return" will be by voluntary agreement with Residents (with support from Family members and Carers) and it will not be imposed if the Resident is well settled in better housing or more appropriate housing to their support and care needs. The housing stock on the aggregated site is considered by regeneration staff to be able to support at least a 50% increase in homes – from outdated bed-site to new 1 bedroom accommodation with high quality ancillary facilities.

In terms of reducing the adverse impact on residents, the Council should consider adopting the draft "Charter – Supporting Residents in Change at Watkins House". This will provide a whole series of clarity and guarantees to Tenants and family members on the level of statutory support that will be available e.g. Home Loss payments but as importantly *the level of discretionary support* that will be available to tenants and family members – in recognition of the issues in this EqIA and best practice in mitigating impacts.

There is the potential to change the housing and through that the care and support for Tenants to a setting that will be more attuned to their personal needs but this will require very comprehensive and sensitive assessment of their current

needs. The Council will have to employ a staff member with suitable skills to work with each resident and with the group of residents and family members as a whole – to secure alternative housing that is in the best interests of each resident.

If option 3 is approved the impact on Staff is complex through the potential of redundancy being imposed – all staff are female. This will have to be handled through application of redeployment/redundancy policies and procedures. The full impact on staff will not be known until after the selection of the proposed Developer but the situation points to a redeployment/redundancy position.

This EqIA will require a constant monitoring process through the Watkins House Project Board, and this has been set for a monthly review process.

Stage 9 - Organisational sign Off			
<b>13</b> . Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	The Watkins House Project Board – initial EqIA agreed at May meeting of the Project Board.  This EqIA was discussed at Watkins House Project Board on 25 August and on 22 September.  Referred to the Directorate Equalities Task Group – DESG - meeting on 22 September. The basis of EqIA and Improvement Action Plan agreed at both meetings – with some presentation, text and formatting changes agreed at DESG meeting, and these are now completed.		
Signed: (Lead officer completing EqIA)	Karen Connell/Peter Mulloy	Signed: (Chair of DETG)	Dave Corby
Date:	22 March 2016 06 April 2016 4 May 2016 4 August 2016 25 August 2016 22 September 2016 at DESG 22 September at Watkins House Project Board	Date: 27.9.16	
Date EqIA presented at the EqIA Quality Assurance Group (if required)	22 September 2016	Signature of DETG Chair	Dave Corby