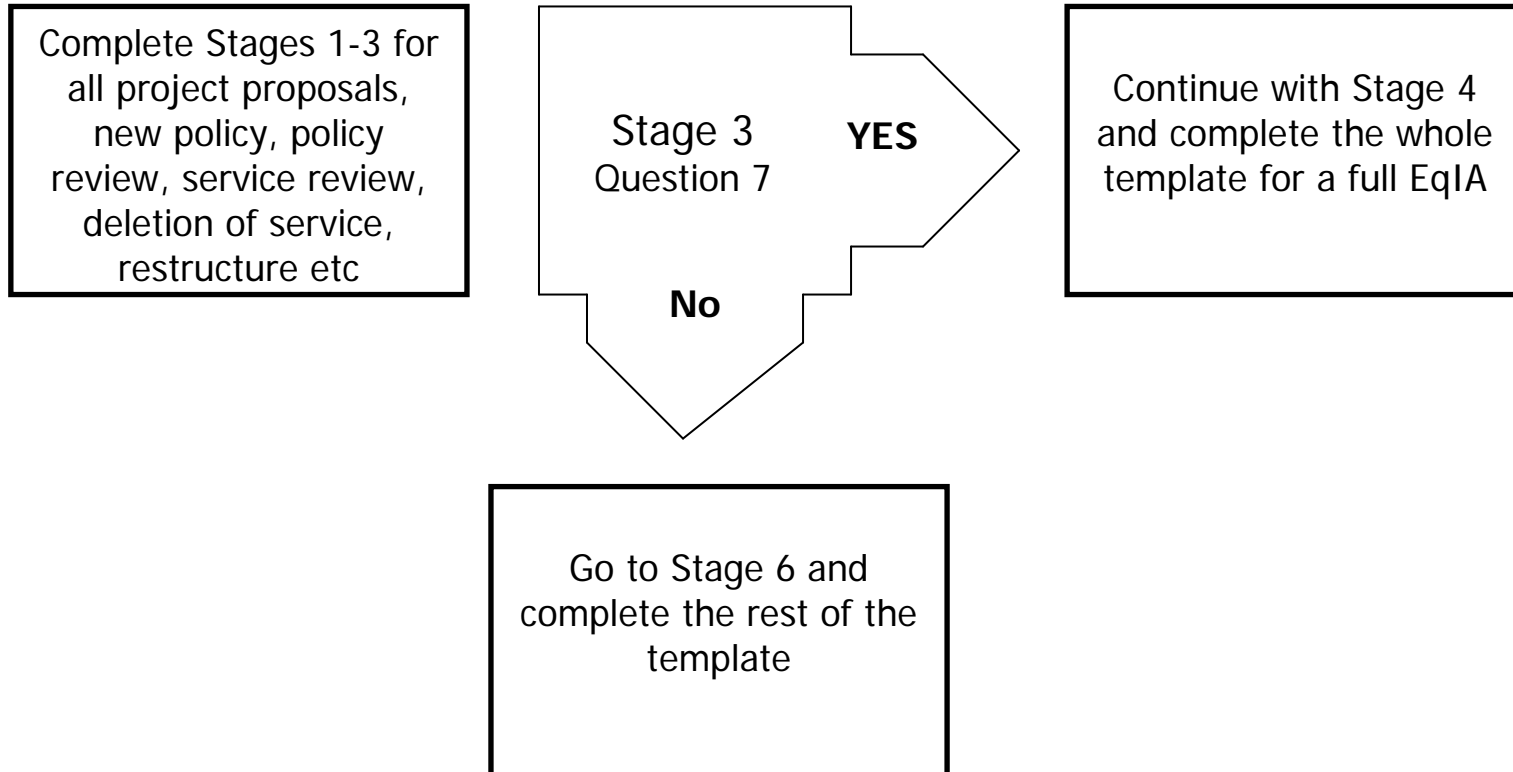


# Equality Impact Assessment Template

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:		Selective Licensing in Edgware Ward saving 35 k CE 9 (community 74 )			
Directorate / Service responsible:		Environment and Enterprise / Public Protection			
Name and job title of lead officer:		Richard Le-Brun, Environmental Services Manager (Public Protection)			
Name & contact details of the other persons involved in the assessment:					
Date of assessment:		26 <sup>th</sup> May 2015 – Reviewed December 2016			
<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>Introduction of a licensing scheme for private rented sector in Edgware Ward to tackle matters of anti-social behaviour, property standards and environmental impacts.</p> <p>All private rented sector properties, except statutory exemptions, will be required to be licensed and meet conditions that are aimed at ensuring fit and proper management and tenancy, providing a fair environment for all landlords, better choice and standard of rented accommodation, and be adverse to rogue and non-compliant landlords and tenants.</p>			
<p><b>2. Who are the main people / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</b></p>		Residents / Service Users	✓	Partners	✓
		Staff	✓	Age	✓
				Stakeholders	✓
				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?

### 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 no evidence found to show selective licensing has a potential impact on this characteristic
Disability (including carers of disabled people)	There is no evidence found to show selective licensing has a potential impact on this characteristic
Gender Reassignment	There is no evidence found to show selective licensing has a potential impact on this characteristic
Marriage / Civil Partnership	There is no evidence found to show selective licensing has a potential impact on this characteristic
Pregnancy and Maternity	There is no evidence found to show selective licensing has a potential impact on this characteristic
Race	Harrow has a high ethnic minority population, but the consultation in Edgware found that 40% of tenants were UK born, with next highest percentage being Indian (25%). 37% do not have English as their first language. This is not uncommon for Harrow as a whole, and has been addressed by provision of

	information in different languages where feasible, including consultation forms when requested.
Religion and Belief	There is no evidence found to show selective licensing has a potential impact on this characteristic
Sex / Gender	There is no evidence found to show selective licensing has a potential impact on this characteristic
Sexual Orientation	There is no evidence found to show selective licensing has a potential impact on this characteristic
Socio Economic	Selective Licensing directly impacts the community to aim to improve the socio economic aspects of it, through addressing crime, ASB, environmental and property issues, making it a more desirable place to be. This will seek to improve sustainable tenancy and a more stable private rented sector.

**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).
Residents, Landlords, Partners	On line and paper, including door to door delivery in Ward. Forums including Borough and local. Meetings and communication with relevant parties	No specific impact highlighted. Concerns over effect which will be monitored, but no data from current housing licensing schemes or other Councils introduction of selective licensing to indicate adverse effect	Continued monitoring of characteristics as part of the scheme, including applications and enforcement, to ensure no detrimental effect on any one characteristic.

<b>6. What other (local, regional, national research, reports, media) data sources that you have used to inform this assessment?</b>	A door to door housing survey was conducted throughout Edgware, with consultation forms delivered to all. Additionally consultation forms for residents, landlords, businesses and partners was provided, including on the Harrow website.
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List the Title of reports / documents and websites here.	A landlord forum and a specific Edgware forum were conducted. Meetings also took place with organisations including the National Landlord Association. Harrow Vitality Report
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### Stage 3: Assessing Potential Disproportionate Impact

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

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

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

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

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

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

### Stage 4: Collating Additional data / Evidence

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)	A door to door housing survey was conducted throughout Edgware, with consultation forms delivered to all. Additionally consultation forms for residents, landlords, businesses and partners was provided, including on the Harrow website. A landlord forum and a specific Edgware forum were conducted. Meetings also took place with organisations including the National Landlord Association. Further EQiA assessments shall be conducted as part of the scheme, through the collection of data that is submitted with the application forms.
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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).
Residents, Landlords, Partners	On line and paper, including door to door delivery in Ward. Forums including Borough and local. Meetings and communication with relevant parties	No specific impact highlighted. Concerns over effect which will be monitored, but no data from current housing licensing schemes or other Councils introduction of selective licensing to indicate adverse effect	N/A

### 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)		✓	The findings of other Councils that have conducted this scheme have found no adverse affect against any characteristic, as it affects all equally. It has the potential to improve the situation for all areas of the community as increases knowledge of legal requirements and affects landlords and tenants regardless of age, race, disability etc.	As part of the designation period, being 3 months, advertising of the scheme and information about it will be advertised throughout the ward as well as in media that goes beyond the boundaries of the ward (e.g. local papers, Harrow website etc)  As with other licensing schemes currently being run, advice

people)			The results of enforcement may lead to certain premises being stopped from being rented out, due to not meeting minimum standards, and assistance being given to the occupants but these could be of any age, race, disability etc. but does ensure they are subject to minimum acceptable living conditions as is their human right.	and guidance for those affected (in this case, landlords and tenants) will be available from the Council, who will work with all parties to ensure compliance.  To maximize this positive impact, discussions are already underway with organizations such as the National Landlord Association to provide free landlord advice, as well as community leaders (Councillors, representatives of certain communities etc) to get the message out about what it means and where further information is available
Disability (including carers of disabled people)		✓	As above	As above
Gender Reassignment		✓	As above	As above
Marriage and Civil Partnership		✓	As above	As above
Pregnancy and Maternity		✓	As above	As above
Race			As above	As above

Religion or Belief		✓	As above	As above					
Sex		✓	As above	As above					
Sexual orientation		✓	As above	As above					
<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?				Yes		No	✓		
If yes, which Protected Characteristics could be affected and what is the potential impact?									
<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?				Yes	✓	No			
If yes, what is the potential impact and how likely is to happen?				<b>Overall it is expected to have a positive impact as will seek to raise standards in an area, especially the private rented sector. It aims to directly affect ASB, crime and environmental issues that have a detrimental effect on all in a community. It will also aim to assist landlords and tenants by setting clear standards to be met through conditions, and allow a more stable, suitable PRS market in the area.</b>					
<b>12.</b> 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 <a href="#">Harrow HUB/Equalities and Diversity/Policies and Legislation</a>									
	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.	Action required to mitigate	How will you know this is achieved? E.g.	Target Date	Lead Officer	Date Action included in
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Race, Disability		Performance Measure / Target			Service / Team Plan
All	The approval of a designation for the Edgware Ward will lead to a 3 month run in period, which will be used to advertise the scheme across all formats,	Use of local paper(s) and website, as well as Ward signage and direct communications with parties	August to October 2015	R Le-Brun	Integral to cabinet report
All	Work with National Landlord Association (NLA) to encourage Landlords to sign up to free information scheme that will assist them in complying	NLA to be invited to forums and provide information to be disseminated	Ongoing	R Le-Brun	In Cabinet Report

### 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>	Monitoring of application form information from landlord; gathering of information from inspections conducted; monitoring of enforcement action in the private rented sector in Ward
<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>	Annual review as part of service plan, policy and procedure review
<b>17.</b> Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	Consultation that took place between November 2014 and April 2015, as well as forums. Direct addressing of any issues raised.

### 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
Clear enforcement policies and procedures in line with Statutory requirements	Provision of a set consistent standard across the market in the area, regardless of characteristic, but allowing different approaches to meet it	Clear enforcement policies and procedures in line with Statutory requirements. Additionally, by introducing clear standards to all, there is no blame culture of different premises meeting different standards linked to culture, race etc

**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)	Richard LeBrun	Signed: (Chair of DETG)	Dave Corby
Date:	19/12/2016	Date:	27/01/2017
Date EqIA presented at the EqIA Quality Assurance Group		Signature of ETG Chair	