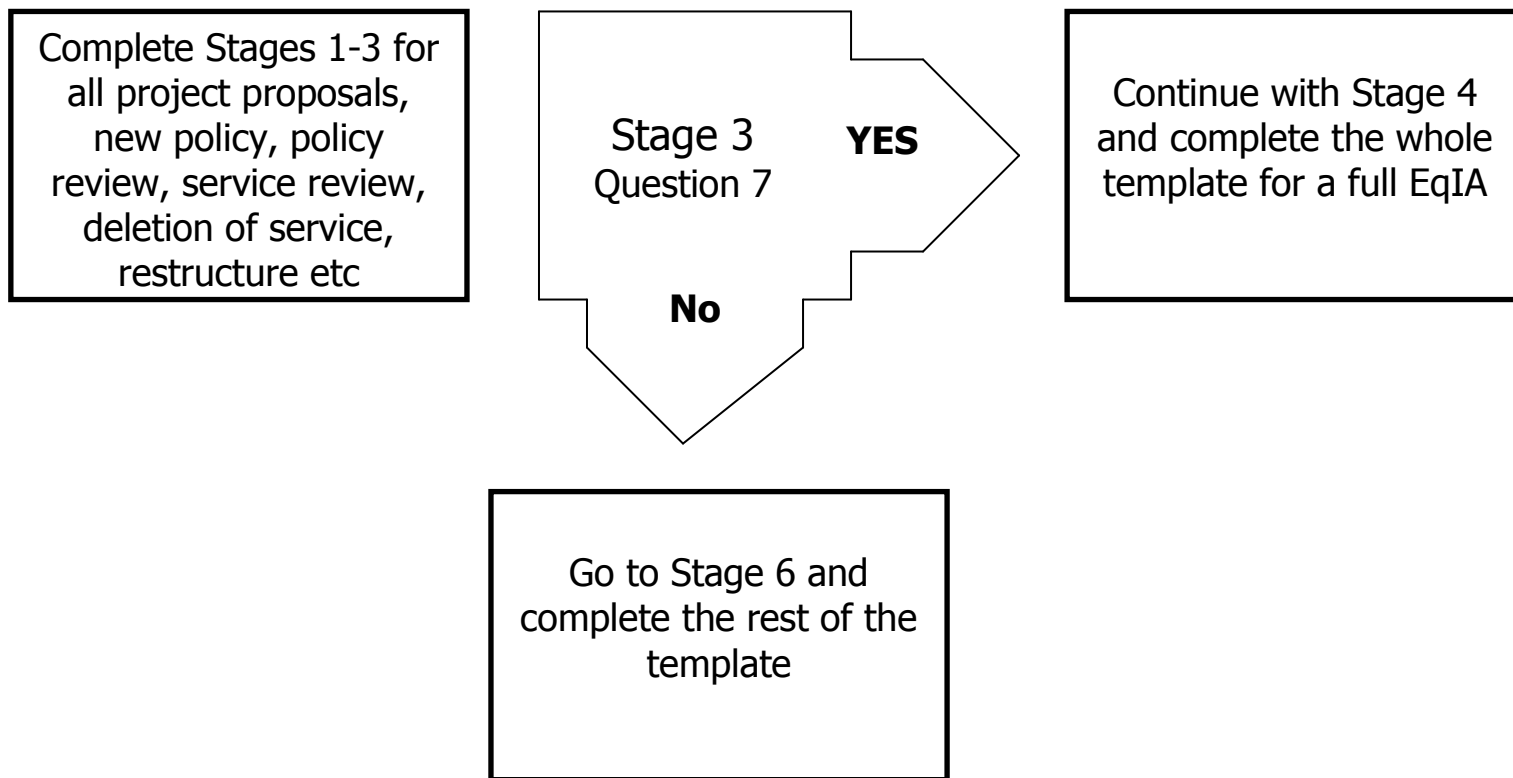


Equality Impact Assessment Template

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:	The Community Safety Strategy for 2017-2020		
Directorate/Service responsible:	Resources to co-ordinate; all to deliver		
Name and job title of lead officer:	Shumaila Dar, Policy Officer		
Name & contact details of the other persons involved in the assessment:	Safer Harrow		
Date of assessment:	20 th June 2017		

Stage 1: Overview

1. What are you trying to do?

(Explain proposals e.g. introduction of a new service or policy, policy review, changing criteria, reduction / removal of service, restructure, deletion of posts etc)

All Community Safety Partnerships are required by law to conduct an annual assessment of crime, disorder, anti-social behaviour, substance misuse and reoffending within the borough. This is known as the Strategic Assessment. The Strategic Assessment is then used to produce the partnership's Community Safety Strategy. This Strategy sets out priorities for community safety activity over the years 2017-2020 so that the Council, the Police, the Health Service, voluntary and community organisations and others share a common direction of travel in relation to community safety.

The priorities from the previous Mayor's Office for Policing and Crime (MOPAC) 7 crimes have changed significantly, which involves the replacement of the previous Mayor's crime targets in favour of a thematic approach which gives local areas greater control of local police priorities. This Community Safety and Violence,

Vulnerability and Exploitation (VVE) Strategy sets out the Council's vision for tackling community safety in Harrow and takes into account the recommendations from the Home Office led Ending Gang and Youth Violence peer review in 2015, which addressed the issue of gang and youth violence locally. Furthermore, given that there is now a new strategic approach from the Mayor to policing and crime, there are clear synergies with the VVE agenda in general and also with domestic and sexual violence under the '*Tackling Violence Against Women and Girls*' theme. This Strategy will therefore include our vision for Domestic and Sexual Violence.

The following high volume crimes have been prioritised following a significant increase in these areas and in agreement with the Mayor's Office for Policing and Crime (MOPAC):

1. *Burglary*
2. *Non-domestic violence with injury*
3. *Anti-social behaviour (ASB)*

The Strategy also has a strong focus on the following aspects of high harm crime which reinforce the commitment to tackle violence, vulnerability and exploitation in the borough. This also firmly echoes the current Mayor's priorities, and includes a renewed focus on tackling Youth Violence. The following areas are seen as priorities in Harrow:

1. *Youth violence and knife crime (including gang crime, and Child Sexual Exploitation)*
2. *Domestic and sexual abuse*
3. *Drug and alcohol misuse (including tackling the supply of illegal substances, and targeted support for ex-prisoners)*
4. *Extremism and hate crime*

In addition to this we have considered commitments within the forthcoming **Safeguarding Adults Strategic Plan 2017-20** and the **Review of Female Genital Mutilation (FGM) in Harrow**, in order to ensure a consistent and joined up approach across the Council.

2. Who are the main people/Protected Characteristics that may be affected by your proposals? (✓ all that apply)	Residents/Service Users	✓	Partners	✓	Stakeholders	✓
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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?

All Council Directorates, including Environmental Crime, Community Safety, and Children's Services (YOT, Early Intervention), Domestic and Sexual Violence, Safeguarding Adults Services, Housing, Public Health, and Police, Local Safeguarding Children's Board, Probation, Community Rehabilitation Company, Health partners, and the London Fire Brigade.

Safer Harrow has considered the Annual Crime Report which analyses all Mayor's Office for Policing and Crime 7 crimes (Violence with injury; Robbery; Burglary; Theft of a motor vehicle; Theft from a motor vehicle; Theft from a person; Criminal damage) as well as, ASB, Knife Crime with Injury, and Gangs Flagged Offences. This Community Safety Strategy has been drafted in light of the evidence we have gathered in relation to these high volume and high harm crimes. Had any adverse impacts been identified in this report, they would have been reported to Safer Harrow to consider changing the Strategy.

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)

20.6% of Harrow's residents are under 16. 64.5% of Harrow's population are of working age (16 to 64) and 14.9% of Harrow's residents are 65 or older.² The average (median) age is 37 years, lower than most other places³. As with most areas in the country, the borough has an aging population. It is expected that the number of residents aged 65 plus will increase by nearly 42% and those aged 85 plus could increase by over 62% by 2029.

Of the crime types where the age of the victim and the suspect might be relevant, crimes relating to the

	<p>following crime types will be young, aged from 0-25:</p> <ul style="list-style-type: none"> • Youth Violence – In 2016/17 36 young people were convicted of possession of an offensive weapon, compared to 28 young people in the previous year, this is based on data collected by the Council’s Youth Offending Team. • Knife Crime – Assessments of young people by the YOT indicate that young people are carrying knives due to feeling unsafe and the majority of knives have been kitchen knives rather than “trophy” knives. Knife crime incidents made up a total of 281 offences in April 2015 to March 2016 in young people aged 0-25, this increased by 29% in the following year to 362 incidents between April 2016 to March 2017. • Child Sexual Exploitation and Female Genital Mutilation – Crimes are relating to young people aged under the age of 18. Young people involved in the supply of illegal substances – There has been a significant increase in referrals to the Harrow Young People’s Substance Misuse Service from universal and alternative education between 15/16 Q3 and 16/17 Q3 with referrals from YOT remaining consistent. In 16/17 Q3 there were more referrals from education than from YOT which reflects the changing national picture <p>There is a particular focus on high harm crime in the Community Safety Strategy which is aimed largely at young people. This reinforces our commitment to tackle violence, vulnerability and exploitation in the borough and firmly echoes the current Mayor’s priorities, and includes a renewed focus on Anti-Social Behaviour and Youth Violence</p>
Disability (including carers of disabled people)	<p>15.4% of Harrow’s working age population classified themselves as disabled, a total of 24,600 people. 6,769 individuals, 3.1% of the total population, receive Disability Living Allowance. We recognise that adults in need of care/support are often at risk of domestic violence and abuse. A recent deep dive by the Safeguarding Adults Team showed that 33% (171 cases) of all safeguarding adults enquiries taken forward in 2016/17 had an element of domestic violence and abuse, and older people were the most “at risk group” (45%) followed by mental health users (42%). The Harrow Safeguarding Adults Board (HSAB) has agreed that training and awareness raising should be targeted to agencies where no/low referrals have been generated, this will also include a greater focus on the multi-agency training programme for safeguarding adults in relation to this domestic violence and abuse.</p>
Gender Reassignment	No data on crime affecting this protected characteristic
Marriage/Civil Partnership	No data on crime affecting this protected characteristic
Pregnancy and Maternity	No data on crime affecting this protected characteristic

Race	<p>9.1% of residents in Harrow classify themselves as belonging to a minority ethnic group. The White British group forms the remaining 30.9% of the population, (down from 50% in 2001). The 'Asian/Asian British: Indian' group form 26.4% of the population. 11.3% are 'Other Asian', reflecting Harrow's sizeable Sri Lankan community. 8.2% of residents are 'White Other', up from 4.5% in 2001. In percentage terms, in 2011, Harrow had the second largest Indian, the largest 'Other Asian' and the 7th largest Irish population of any local authority in England and Wales. Harrow also had the highest proportion of Romanian (4,784) and Kenyan born residents, the latter reflecting migrants from Kenya who are of Asian descent</p> <p>Of the crime types where the ethnicity of the victim and of the suspect might be relevant, there is no clear pattern.</p> <p>Harrow has the lowest level of hate crime. However, there is thought to be significant under reporting in relation to racist and religious hate crime nationally.</p> <p>There is limited data in relation to the racial make-up of offenders, however last year the Government published the Lammy Review, which looks at BAME disproportionality in the criminal justice system in England and Wales.</p> <p>According to a developing 'Problem Profile' it would appear that there is a danger of young females, particularly of Black British/Black African ethnicity, becoming involved in gang-related activity. Among those deemed at risk of involvement (eg through sibling relationship to gang nominals) who are under the age of 13, there is a significant gender difference compared to the older gang-related cases: almost 50% of this sub-group are females, while 44% are of Black or Black British ethnicity. Addressing this issue can be seen as part of the Mayor of London's objective of diverting young females from the criminal justice system.</p>
Religion and Belief	<p>Harrow had the third highest level of religious diversity of the 348 local authorities in England or Wales. The borough had the highest proportion of Hindus, Jains and members of the Unification Church, the second highest figures for Zoroastrianism and was 6th for Judaism. 37% of the population are Christian, the 5th lowest figure in the country. Muslims accounted for 12.5% of the population. Harrow has the lowest level of hate crime. However, there is thought to be significant under reporting in relation to racist and religious hate crime nationally.</p>
Sex/Gender	<p>49.8% of the population in Harrow are male and 50.2% are female. 92% of cases referred to MARAC, Community IDVA and MASH IDVA were women.</p> <p>There is currently no provision for refuge accommodation for male victims of DV in Harrow; however this is a pan-London issue and is identified as a service provision gap. Most recent MOPAC figures (March</p>

	2017) show that men represented 24% of all victims of Domestic Abuse and Violence. Closer working with police partners and neighbouring Boroughs would appear to be beneficial in this area, with a view to widen the provision of support. From the data available it would also seem necessary to consider the provision of hostel space and support for male victims – in line with Equality and Diversity strategies – as these are, at present, wholly lacking.
Sexual Orientation	2% of cases referred to MARAC, Community IDVA and MASH IDVA were LGBTQ.
Socio Economic	<p>Harrow is an affluent borough with pockets of deprivation mainly around the centre, the south and east of the borough; including the wards, Roxbourne, Greenhill, Marlborough, Harrow Weald, and Wealdstone, which also has the highest level of income deprivation in the borough. Harrow's least deprived areas are largely found in the north and west of the borough.</p> <ul style="list-style-type: none"> • The 2015 Index of Multiple Deprivation (IMD) indicates 12,083 of Harrow's residents experiencing employment deprivation (this includes people who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities). • Wealdstone is Harrow's most deprived ward for employment deprivation, closely followed by Roxbourne. • Unemployment figures are highest in Greenhill, Wealdstone and Roxbourne wards. • Employment deprivation is generally concentrated in areas with higher levels of social housing, such as the Rayners Lane Estate in Roxbourne; the Headstone Estate in Hatch End and Harrow Weald; the Woodlands and Cottesmore Estates in Stanmore Park; and the former Mill Farm Close Estate in Pinner (however a recent report by London School of Economics (2016) suggests that the £140m regeneration programme in the Rayners Lane estate has brought positive changes to the estate) • The Indices of Multiple Deprivation (IMD) Income Deprivation scale indicates that 30,733 of Harrow's residents are currently experiencing income deprivation. Wealdstone is Harrow's most deprived ward for this measure and for income deprivation affecting children, closely followed by Roxbourne, then Marlborough and Harrow Weald. • Over a fifth of Harrow's residents are in low paid jobs. In part this relates to the business composition of the borough, with small businesses paying less than larger companies and in part due to a significant number of residents having low skills¹. • The highest proportions of the population without qualifications or with low level qualifications are in Kenton East, Edgware, Roxbourne and Roxeth, and Harrow was one of 25 local authority areas identified by the Department for Communities and Local Government as an area with high levels of need for English Language provision.

¹ CLG, *Indices of Deprivation 2015*, Crown Copyright

	<ul style="list-style-type: none"> • 28.5 % of Harrow’s residents have a foreign first language. In 15.9 % of households English is not the main language of any household occupants, the 10th highest ranking nationally and much higher than the national level of 4.3 %. • The 2011 census showed 1% of Harrow residents unable to speak English at all, compared to 0.6% for London and a national figure of 0.3%. • 17% of children are living in poverty in Harrow before housing costs, and this rises to 27 after housing costs in Harrow (Dec 2015).
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5. What consultation have you undertaken on your proposals?

Who was consulted?	What consultation methods were used?	What do the results show about the impact on different groups / Protected Characteristics?	What actions have you taken to address the findings of the consultation? (This may include further consultation with the affected groups, revising your proposals).
Safer Harrow	Consultation at Safer Harrow and informally with key stakeholders.	There is no significant adverse impact on our proposals on any of the protected characteristics within the borough. However there is a small issue with data collection around the ethnicity of young people committing crimes. There is also an issue around the collection of data in relation to cases of FGM, however this is a national issue and not exclusive to Harrow.	The issue of better data collection will be picked up as part of Safer Harrow’s governance review and will be part of the Community Safety and VVE Delivery Plan which will be published in September 2017. In addition to this, colleagues from Children’s Services are involved in a roundtable discussion in relation to the David Lammy review of the disproportionality of ethnic minorities in the criminal justice system. Outcomes and recommendations from this will be addressed by the Safer Harrow partnership.

6. What other (local, regional, national research, reports,	<ul style="list-style-type: none"> • Metropolitan Police
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media) data sources that you have used to inform this assessment?
 List the Title of reports / documents and websites here.

- Safe Stats
- MOPAC Crime Dashboard
- MOPAC Gangs Dashboard
- Emergency Care Dataset
- Harrow MVM data
- Police street crime data set
- Mid-Year Population Estimates
- Indices of Deprivation 2015
- Harrow Council (2017) Equality Matters: Reducing Inequality in Harrow
- LSE, (2016) Moving on without moving out: the impacts of regeneration on the Rayners Lane Estate
- Harrow Council's Safeguarding Adults Strategic Plan 2017-20
- Harrow Council's Review of Female Genital Mutilation (FGM) in Harrow

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. Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 9	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 7)
Age (including carers of young/older)	If you ticked no for the PC's in Stage 3,	x	Harrow Council has been successful in securing funding from the Mayor's London Crime Prevention Fund aimed at tackling violence, vulnerability and exploitation in young people and children. Four innovative programmes will focus on secondary	

people)	you don't need to complete this section, go to stage 6.		<p>aged children with a view to engaging with vulnerable young people who are at risk of criminal activity. This includes:</p> <ul style="list-style-type: none"> • Recruitment of a gangs worker who will work with young people connected to the known gangs in the area and those who are engaged in high levels of anti-social, violent and criminal behaviour. • Art and drama programme aimed at Years 9 and 10 for children at risk of entering the criminal justice system. • Working with WISH to deliver targeted outreach and support services to young people within identified schools specifically aimed at promoting awareness of sexual assault, CSE, and digital exploitation. • Delivering preventative interventions via Compass to support young people at risk of becoming involved in the supply of illicit substances via 1-1 and group sessions. 	
Disability (including carers of disabled people)				
Gender Reassignment				
Marriage and				

Civil Partnership				
Pregnancy and Maternity				
Race				
Religion or Belief				
Sex				
Sexual orientation				
11. Cumulative Impact – Considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on a particular Protected Characteristic? If yes, which Protected Characteristics could be affected and what is the potential impact?	Yes		No	x
11a. Any Other Impact – Considering what else is happening within the	Yes		No	x

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?

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.	✓
Outcome 2 – Minor adjustments to remove / mitigate adverse impact or advance equality have been identified by the EqIA. <i>List the actions you propose to take to address this in the Improvement Action Plan at Stage 7</i>	
Outcome 3 – Continue with proposals despite having identified potential for adverse impact or missed opportunities to advance equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce the adverse impact and/or plans to monitor the impact. (Explain this in 13a below)	
Outcome 4 – Stop and rethink: when there is potential for serious adverse impact or disadvantage to one or more protected	

groups. (You are encouraged to seek Legal Advice about the potential for unlawful conduct under equalities legislation)	
13a. If your EqIA is assessed as outcome 3 or you have ticked 'yes' in Q12 , explain your justification with full reasoning to continue with your proposals.	

Stage 7: Improvement Action Plan

14. List below any actions you plan to take as a result of this Impact Assessment. This should include any actions identified throughout the EqIA.

Area of potential adverse impact e.g. Race, Disability	Action required to mitigate	How will you know this is achieved? E.g. Performance Measure / Target	Target Date	Lead Officer	Date Action included in Service / Team Plan

Stage 8 - Monitoring

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

15. How will you monitor the impact of the proposals once they have been implemented? What monitoring measures need to be introduced to ensure effective monitoring of your proposals? How often will you do this? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	The Crime Report is produced annually and the Community Safety Strategy updated to reflect changing circumstances. Therefore, a change in the crime pattern affecting one or more protected characteristic will be highlighted early in the new financial year. Safer Harrow is also in the process of developing a Community Safety and VVE Delivery Plan which will enable Safer Harrow to monitor the progress of all proposals.
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16. How will the results of any monitoring be analysed, reported and publicised? <i>(Also Include in Improvement Action Plan at Stage 7)</i>	Regular crime monitoring at Safer Harrow will enable the impact of the actions proposed in the Community Safety Strategy to be assessed.
17. Have you received any complaints or compliments about the proposals being assessed? If so, provide details.	No

Stage 9: Public Sector Equality Duty

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

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

Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups
The Strategy includes recognition of the importance of Community Cohesion in setting a climate in which crime is regarded as unacceptable. Community Cohesion is enhanced by more comprehensive reporting of crimes and especially Hate Crime and its prompt and robust investigation.		Reducing crime increases community confidence and cohesion, enabling people from different backgrounds more easily to trust each other.

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)	Shumaila Dar	Signed: (Chair of DETG)	Alex Dewsnap
Date:	20 th June 2017	Date:	20 th June 2017
Date EqIA presented at the EqIA Quality Assurance Group	27 th June 2017	Signature of ETG Chair	Alex Dewsnap

