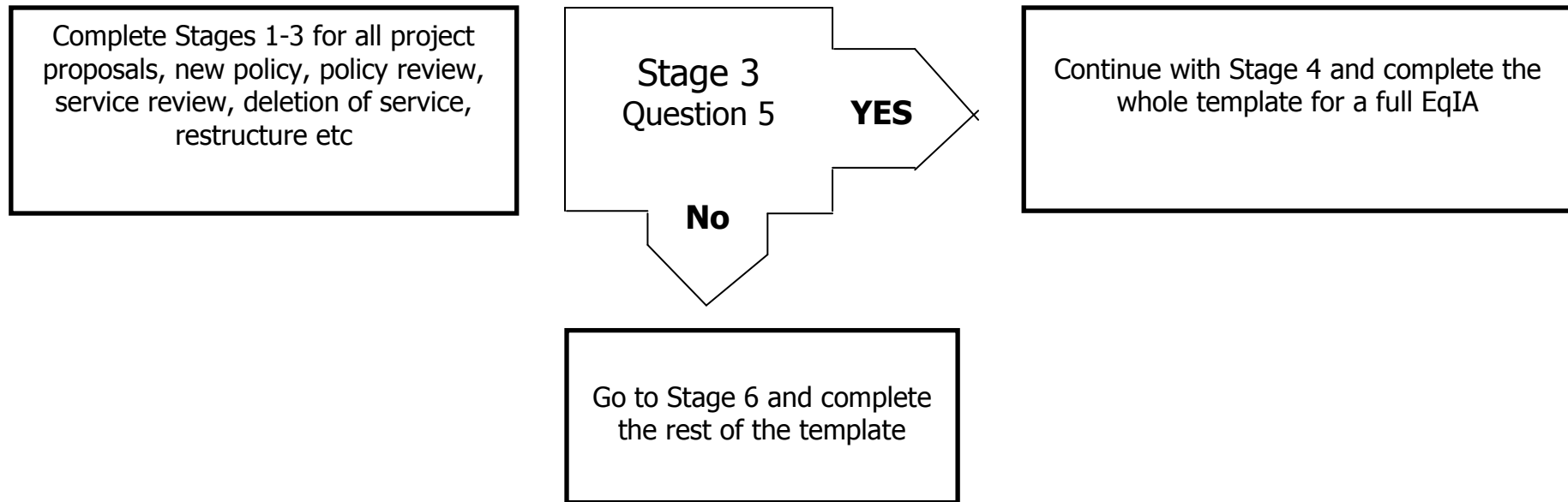


Equality Impact Assessment Template

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.
- Legal will NOT accept any report 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 ✓	X	Cabinet		Portfolio Holder		Other (explain)	
Date decision to be taken:	14 September 2017						
Value of savings to be made (if applicable):	N/A						
Title of Project:	Integrated Enforcement Policy						
Directorate / Service responsible:	Community Directorate						
Name and job title of Lead Officer:	Simon Baxter						
Name & contact details of the other persons involved in the assessment:	Simon Baxter						
Date of assessment (including review dates):	12/04/2017 (originally) 21/07/2017 (post consultation)						

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>	<p>This policy has been developed to provide a framework for enforcement in Harrow. The policy spans 3 years thereby giving the council the flexibility to review the policy in light of changes that occur in the enforcement sector. It has been developed with reference to national guidance as well as taking into account regional work in this area.</p> <p>Cabinet is requested to:</p> <ol style="list-style-type: none"> 1. Note the outcome of the consultation undertaken. 2. Approve the final policy for adoption with immediate effect. 3. Delegate authority to the Corporate Director of Community, following consultation with the Portfolio Holder for Environment to make amendments to the policy.
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<p>2. Who are the main groups / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</p>	Residents / Service Users	x	Partners	x	Stakeholders	x
	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> <ul style="list-style-type: none"> • Who are the partners? • Who has the overall responsibility? • How have they been involved in the assessment? 	<p>This policy has been developed with the involvement of planning enforcement and housing (tackling ASB).</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 should 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)	<p>The 2011 Census estimated there were 239,100 people living in Harrow</p> <p>Looking at the borough's population in three broad age groups, 0-15 (children), 16-64 (working age) and 65+ (older people), the breakdown (Census 2011) is as follows: 0-15 20.1%, 16-64 65.8%, 65+ 14.1%.</p>	<p>No data available to demonstrate that this group would be disproportionately affected. Consultation has been undertaken and as a result no changes are proposed to the policy.</p>
Disability (including carers of disabled people)	<p>6,380 people in Harrow were recipients of Employment and Support Allowance (ESA) and Incapacity Benefits in August 2015, 4.0% of the total resident population.</p>	<p>No data available to demonstrate that this group would be disproportionately affected. Consultation has been undertaken and as a result no changes are proposed to the policy.</p>
Gender Reassignment	<p>No data available to demonstrate that this group would be disproportionately affected.</p>	<p>No data available to demonstrate that this group would be disproportionately affected. Consultation has been undertaken and as a result no changes are proposed to the policy.</p>
Marriage / Civil Partnership	<p>No data available to demonstrate that this group would be disproportionately affected.</p>	<p>No data available to demonstrate that this group would be disproportionately affected. Consultation has been undertaken and as a result no changes are proposed to the policy.</p>
Pregnancy and Maternity	<p>No data available to demonstrate that this group would be</p>	<p>No data available to demonstrate that this group would be disproportionately affected. Consultation has been undertaken</p>

	disproportionately affected.	and as a result no changes are proposed to the policy.
Race	<p>The GLA's 2011 Census Ethnic Diversity Indices show that Harrow is ranked 7th nationally for ethnic diversity. Diversity indices measure the number of different/distinct groups present in the population and the sizes of these distinct groups relative to each other.</p> <p>The main ethnic groups identified by the 2011 Census were: 30.88% White (UK); 26.38% Indian; 11.2% Other Asian; 8.2% Other White; 3.57 African.</p>	No data available to demonstrate that this group would be disproportionately affected. Consultation has been undertaken and as a result no changes are proposed to the policy.
Religion and Belief	The 2011 Census showed the following religions in Harrow: Christian 37.31%; Buddhist 1.13%; Hindu 25.27%; Jewish 4.41%; Muslim 12.5%; Sikh 1.15%; other religions 2.49%.	No data available to demonstrate that this group would be disproportionately affected. Consultation has been undertaken and as a result no changes are proposed to the policy.
Sex / Gender	The 2011 Census showed that there were 118,000 males and 121,000 females in Harrow.	No data available to demonstrate that this group would be disproportionately affected. Consultation has been undertaken and as a result no changes are proposed to the policy.
Sexual Orientation	No data available to demonstrate that this group would be disproportionately affected.	No data available to demonstrate that this group would be disproportionately affected. Consultation has been undertaken and as a result no changes are proposed to the policy.

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									
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, complete a FULL EqIA.

- **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**?

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	What measures can you take to mitigate the impact or advance equality of opportunity?

	✓	Minor ✓	Major ✓	occur. Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 7	E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 6)
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 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?	Yes		No	

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

<ul style="list-style-type: none"> 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
None identified at this stage	Further work will be undertaken as part of the implementation process to mitigate any risks	Agreed action plan with clear objectives in place.	Richard Lebrun	October 2017

Stage 7: Public Sector Equality Duty

<p>10. How do your proposals meet the Public Sector Equality Duty (PSED) to:</p> <ol style="list-style-type: none"> 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 	<p>Feedback from the consultation feedback has been reviewed. In addition the public sector equality duty will be taken into account when implementing this policy.</p>
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Stage 8: Recommendation

<p>11. Which of the following statements best describes the outcome of your EqIA (✓ tick one box only)</p>	
<p>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.</p>	x
<p>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 included in the Action Plan to be addressed.</p>	
<p>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.</p>	

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?	Reviewed by the Chair of the DETG and will be reviewed as part of the Cabinet process.		
Signed: (Lead officer completing EqIA)	██████████	Signed: (Chair of DETG)	██████████
Date:	21/07/2017	Date:	21/07/2017
Date EqIA presented at Cabinet Briefing (if required)	14 September 2017	Signature of DETG Chair (following Cabinet Briefing if relevant)	