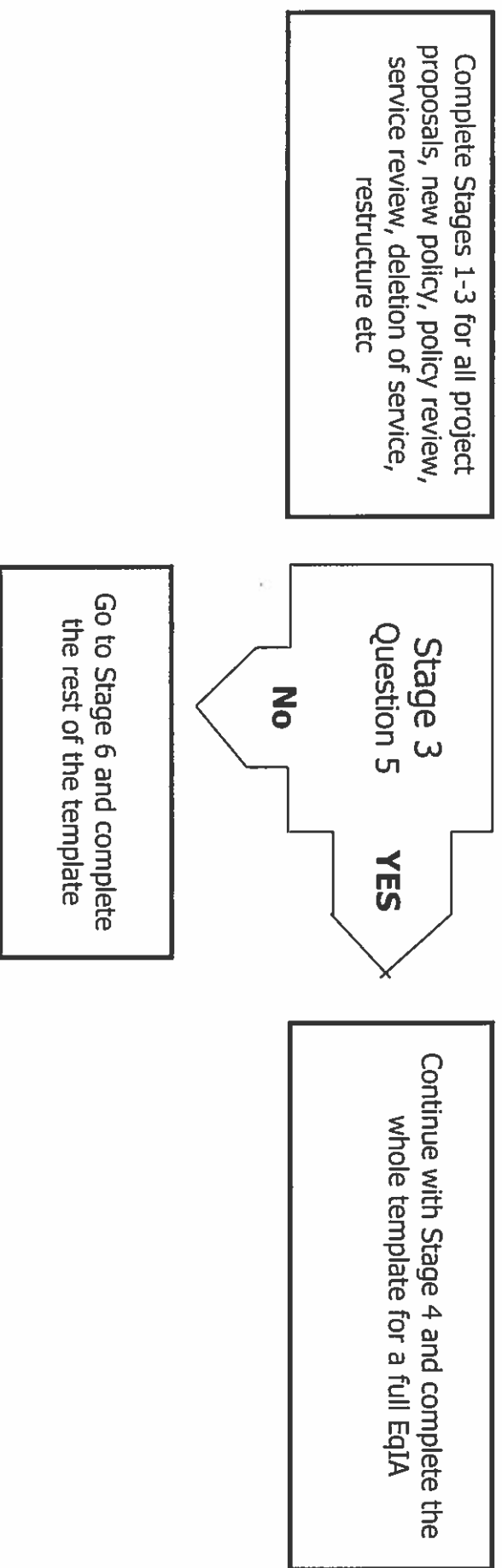


## Equality Impact Assessment Template

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

<b>Type of Decision:</b> Tick ✓	✓	Cabinet	Portfolio Holder	Other (explain)
Date decision to be taken:				
Value of savings to be made (if applicable):				
Title of Project:	Local Discretionary Business Rate Revaluation Support Scheme			
Directorate / Service responsible:	Commercial & Resources			
Name and job title of Lead Officer:	Fern Silverio			
Name & contact details of the other persons involved in the assessment:	Lynn Allaker Revenues Service Manager- 020 8424 1920 (ext 2920) email: <a href="mailto:lynn.allaker@harrow.gov.uk">lynn.allaker@harrow.gov.uk</a>			
Date of assessment (including review dates):				
<b>Stage 1: Overview</b>				
<p><b>1. What are you trying to do?</b></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>The primary objective is the approval of a local Business Rate Relief scheme to support those businesses impacted by the 2017 Revaluation.</p> <p>Central Government announced in the Spring Budget additional funding available for local authorities to develop local policies to support businesses who face steep increases in their rates payable due to the revaluation. This is in addition to two additional support schemes announced at the same time to support :-</p> <ul style="list-style-type: none"> <li>- Businesses who have lost some or all of their Small Business Rate Relief (SBR) as a result of the revaluation and;</li> <li>- An award of £1000.00 to pubs whose 2017 rateable value is below £100,000</li> </ul> <p>The scheme is for the duration of this rating list which is due to cease 31<sup>st</sup> March 2022. The funding from Central Government is a reducing sum year by year with zero for 2021/22.</p> <p>London Borough of Harrow is an outer-London Borough with 5,500 Business Rate properties. The attached analysis shows the breakdown of the types of business premises in the borough. The trend over recent years has been a reduction in</p>			

	<p>commercial premises which have been converted into residential use. This is borne out by the reduction in number of businesses against the number of residential properties which has reduced from 68 per 1,000 households in the 2013 Vitality Profiles to just under 61 per household currently.</p> <p>This policy sets out to support the small and medium businesses in the borough rather than the national organisations which have multiple sites across the country and may have benefited from reductions in the amount payable in business rates due to national variances. Due to this properties with a rateable value over £100,000 have been excluded from this policy.</p> <p>Properties with a rateable value below £15,000 are excluded from this policy which represents 3194 of the 5,500 properties. This is because regulations were amended for 1<sup>st</sup> April 2017 to increase the value at which point ratepayers could receive 100% SBR from RV £6,000 to RV £12,000. This represents 2719 of the 3194 properties.</p> <p>In addition a central government scheme will protect those customers whose rates bill has increased by more than £600.00 or the annual percentage thresholds of the Transitional Scheme where they have lost SBR due to the revaluation.</p> <p>A sector breakdown was provided as part of the consultation process to show where the policy would potentially provide support.</p> <p>It is anticipated that approximately 1335 or 25% of the properties within the borough may benefit from this policy.</p> <p>The system used does not hold equality data and so it is not possible to run any analysis reports to see where the ratepayer has a protected characteristic and is due to pay an increased amount of business rates. Rates liability may also fall on an individual or corporate liability.</p>					
<p><b>2. Who are the main groups / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</b></p>	Residents / Service Users	✓	Partners		Stakeholders	
	Staff		Age	✓	Disability	✓
	Gender Reassignment	✓	Marriage and Civil		Pregnancy and	✓

			Partnership		Maternity	
	Race	✓	Religion or Belief	✓	Sex	✓
	Sexual Orientation	✓	Other			

Overall responsibility will remain with Fern Silverio as Head of Collections and Benefits as the head of department however Access Harrow and our partners Northgate Public Services will be impacted when applying the policy.

The policy has been aligned with long term corporate strategic aims following briefings with CSB, Regeneration Team and Members. Consultation has been carried out with Greater London Authority as well as local Business representative organisations including Chamber of Commerce, Harrow in Business as well as the Federation of Small Businesses and local traders associations.

- 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 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>Sources: 2015 ONS Mid-Year Population Estimates Demographic Briefing Note August 2016 &amp; 2011-13 Vitality Profile</p> <p>36,950 (14.9%) of the population are aged 65 or over. All pensioner households were 18% or 15,083.</p> <p>159,400 (64.5%) are within the working age group defined as 16-64 years old. This has reduced slightly</p>	<p>Business Rates are not calculated based on age and the records do not hold or show this information. Rates liability may fall on an individual or a corporate liability. The home address is not necessarily held on the Business Rate records to determine if they live within the borough or outside so the statistical information available may not be representative of the ratepayers in the borough.</p> <p>The corporate vulnerability policy does not specify age as</p>

	<p>from the 2011-13 vitality profile where the figure was 65.7%.</p> <p>In 2011-13 there were 36.3% or 30,660 households with dependent children which was substantially higher than the London and England average. Lone Parent households accounted for 5,560 of these.</p> <p>There are 22.6% or 19,008 single person households in the borough of which 47% or 8,985 were residents over 65.</p> <p>142 clients age 18 to 64 were receiving care outside of the borough. The number of adults receiving care has remained constant with an increase of just 0.8% compared to March 2009.</p>	<p>a vulnerability but does cover Elderly people, Families with children, young people leaving care and carers. The policy proposed does not intend for awards of relief to be made on this basis however staff are aware of this so would take this into account to allow time for ratepayers to seek support in completing any application process.</p> <p>The policy does however support the corporate aim of supporting and protecting the vulnerable by allowing for additional relief to be awarded to premises involved in the provision of Adult Social Care and Children Day Centres/Nurseries.</p>
<p>Disability (including carers of disabled people)</p>	<p>Sources : 2011-13 Vitality Profile</p> <p>Income Deprivation 2015</p> <p>Harrow is 277<sup>th</sup> out of 326 nationally and 31 out of 33 London Boroughs for Health Deprivation and Disability which measures risk of premature death and the impairment of quality of life through poor physical or mental health.</p>	<p>Business Rates is not calculated based on disability and the records do not show this information. The home address is not necessarily held on the Business Rate records to determine if they live within the borough or outside so the statistical information available may not be representative of the ratepayers in the borough.</p> <p>The corporate vulnerability policy does not specify disability as a vulnerability unless it impacts on their ability to manage their financial affairs effectively and need support. The policy proposed does not intend for awards of relief to be made on this basis however staff are aware of this so would take this into account to allow time for ratepayers to seek support in completing any application process.</p> <p>Where flagged notices from both the Northgate system</p>

		and Civica W2 can be produced in large print and where required in braille.  The Harrow website allows customers to self-serve and incorporates Accessibility tools which enables access to MyHarrow Account where customers can view their Business Rate Accounts and receive alerts for payment and when notices are updated. This is also where the recovery policies are held.
Gender Reassignment	No information available	No information held however business rates are not calculated based on gender or gender reassignment.  Regulations allow for all partners to be held jointly and severally liable regardless of their marital status.  Information is held on titles only where it is a personal liability rather than a corporate organisation.
Marriage / Civil Partnership	There were 528 marriages held at Harrow during 2016/17.	No information held however business rates are not calculated based on these circumstances.
Pregnancy and Maternity	2011-13 Vitality Profile  Nearly 48.5% of the 2,025 residents who cannot speak English are aged 65 or over and a further 2,353 do not speak English very well.	Race is not held on the Council system records and is not taken into account in the calculation of business rates. The home address is not necessarily held on the Business Rate records to determine if they live within the borough or outside so the statistical information available may not be representative of the ratepayers in the borough.
Race	English is the main language for 71.5% of Harrow's residents which is below the London level of 77.9%. Gujarati is Harrow's most commonly spoken language after English with 8.9% (20,386 residents) followed by Tamil at 3.6% (8,304 residents). Proficiency in English has been added to the education, skills and training	Business Rates may be a personal or a corporate liability so the borough information may not be representative of the actual ratepayers.  The corporate vulnerability policy does not specify race as

	<p>deprivation indices information which confirms that Harrow is one of the least education, skills and training deprived local authorities in the country</p> <p>42.2% of Harrow's population is White (100,991). This is broken down further into White British which is 73,826 and other which is 19,648 the majority of whom are from other parts of Europe with a large proportion from Eastern Europe particularly Romania and Poland. The remaining 7,336 is made up of the Irish community. This is a reduction of 20.3% since 2001.</p> <p>44% of Harrow's population is Asian (105,225) which is broken down into Indian 26.4% (63,051) and Pakistani 3.3% (7,797) This is an increase of 59.7% since 2001.</p> <p>9.7% of Harrow's population is Black (23,105) of which 8,526 are African (2,241 Somalian) and 6,812 are Caribbean (1,691 Jamacian). This is an increase of 56.5% since 2001.</p>	<p>a vulnerability. In this case vulnerability is defined as anything that could impact on the ability to manage financial affairs effectively and need support. We don't believe that race would be relevant to this consideration. The policy proposed does not intend for awards of relief to be made on this basis however staff are aware of this so would take this into account to allow time for ratepayers to seek support in completing any application process.</p> <p>Corporately documents are no longer held in a variety of different languages however Access Harrow are able to provide translation services where required.</p> <p>As this policy is aimed at small to medium size properties it is likely that the business owners and users will be reflective of the borough diversity and so this policy will support the different races within the local community.</p>
<p><b>Religion and Belief</b></p>	<p>Christianity is Harrow's most common religion 37.3% (89,181) of the borough followed by</p> <ul style="list-style-type: none"> <li>- 25.3% (60,407) as Hindu,</li> <li>- 12.5% (29,881) as Muslim and</li> <li>- 4.4% (10,530) as Jewish.</li> </ul> <p>The remaining 4.8% or 11,397 residents follow other religions which is the highest proportion across the country for residents who follow other religions or beliefs.</p>	<p>Religion and belief are not held on the records for Business Rates and are not taken into account in the calculation of Business Rates. The home address is not necessarily held on the Business Rate records to determine if they live within the borough or outside so the statistical information available may not be representative of the ratepayers in the borough.</p> <p>Business Rates may be a personal or a corporate liability so the borough information may not be representative of the actual ratepayers.</p> <p>All staff who would be assessing entitlement to relief undertake equalities and diversity training on an annual</p>

	22,871 or 9.6% of the residents gave no religion.							basis.	
	This was a voluntary question in the 2011 Census and 14,781 (6.2%) chose not to answer of whom 53.4% were of White ethnicity and 29% were Asian/Asian British							As this policy is aimed at small to medium size properties it is likely that the business owners and users will be reflective of the borough diversity and so this policy will support the different religions within the local community.	
Sex / Gender	50.6% of Harrow's residents are female. 49.4% male.							The title of the ratepayer if a personal liability is held but not used to calculate the charge.  Business Rates may be a personal or a corporate liability so the borough information may not be representative of the actual ratepayers.	
Sexual Orientation								This information is not held and is not used to calculate the charge.	
Consultation	A consultation was carried out between 16 <sup>th</sup> and 30 <sup>th</sup> June 2017. The requirement was to consult with the Greater London Authority only however in addition to this an invitation was extended to the 11 local area Traders Associations, the Federation of Small Businesses as well as our internal Economic Regeneration Team. Only 3 questionnaires were completed of which only 2 gave any Equality monitoring information. By inviting the different local area Traders Associations it is likely that the members will be reflective of the diversity of the borough.								
<b>Stage 3: Assessing Potential Disproportionate Impact</b>									
<b>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?</b>									
	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, 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. <b>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSD Stage 7</b>	<b>E.g. further consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 6)</b>
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	<input checked="" type="checkbox"/>
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**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	<input checked="" type="checkbox"/>
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**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
All	Staff and any contractor will be required to complete equalities and diversity training on a regular basis	Corporate and contractor training records.		
All	Corporate development of MHA and online forms collating and holding equalities data so that impact can be measured by cross referencing data from legacy systems which do not hold equality data against MHA records.	Data cross referencing being made available to service areas.		
All	Where vulnerability has been identified the records will be noted so that this can be considered when making decisions about the customer ability to apply or seek support to apply for relief.			
<b>Stage 7: Public Sector Equality Duty</b>				
<p><b>10.</b> How do your proposals meet the Public Sector Equality Duty (PSED) to:</p> <ol style="list-style-type: none"> <li>1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010</li> <li>2. Advance equality of opportunity between people from different groups</li> </ol>				
		<ol style="list-style-type: none"> <li>1) Business Rates are not calculated based on any of the protected characteristics nor does this policy have any inclusion or exclusion of any protected characteristics.</li> <li>2) Staff are aware of the facilities to support customers who may have difficulty in completing applications via their annual equality training and our vulnerability policy. Once the policy is agreed this will be</li> </ol>		



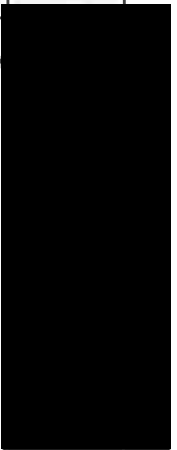
<p>3. Foster good relations between people from different groups</p>	<p>shared with the local Traders Associations and promoted via the monthly Economic Redevelopment Newsletter which reaches other organisations e.g. Harrow In Business, Business Improvement District Officers who would be able to support ratepayers in completing any application process.</p> <p>3) The proposed policy focuses on small and medium sized properties which make up ¾ of the commercial property within the borough. It is probable that the business owners will be representative of the diversity of the borough and will support the local communities and those customers who use their services.</p>
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**Stage 8: Recommendation**

<p><b>11. Which of the following statements best describes the outcome of your EqIA ( ✓ tick one box only)</b></p>	
<p><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 of opportunity are being addressed.</p>	<p>✓</p>
<p><b>Outcome 2</b> – 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><b>Outcome 3</b> – 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. <b>(Explain this in Q12 below)</b></p>	
<p><b>12. If your EqIA is assessed as <b>outcome 3</b> explain your justification with full reasoning to continue with your proposals.</b></p>	

**Stage 9 - Organisational sign Off**

<p><b>13. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?</b></p>	<p>Circulated to the Resources and Commercial Fairer Working Group in week beginning 24<sup>th</sup> July 2017</p>
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Signed: (Lead officer completing EqIA)	Lynn Allaker	Signed: (Chair of DETG)	
Date:	1/8/2017	Date:	01/08/17
Date EqIA presented at Cabinet Briefing (if required)		Signature of DETG Chair (following Cabinet Briefing if relevant)	