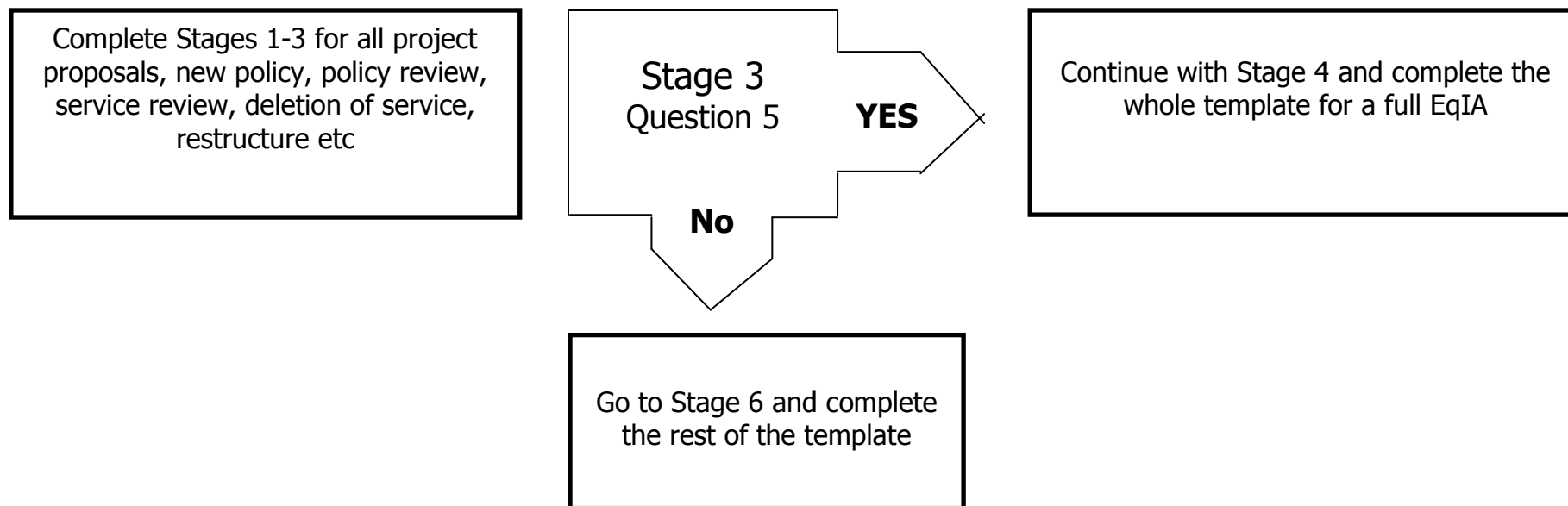


# Equality Impact Assessment Template

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: Tick ✓</b>	✓	Cabinet		Portfolio Holder		Other (explain)	DPB Gateway Report
Date decision to be taken:	18th January 2018						
Value of savings to be made (if applicable):	N/A						
Title of Project:	Provision of Accommodation for Young Unaccompanied Asylum Seekers						
Directorate / Service responsible:	People – Children’s						
Name and job title of Lead Officer:	Peter Tolley Head of Service – Corporate Parenting 0208 736 6943						
Name & contact details of the other persons involved in the assessment:	Claire Kentish Team Manager (Access to Resources) 02084241485  Mital Vagdia People Services Commissioner 0208 736 6418						
Date of assessment (including review dates):	2 <sup>nd</sup> November 2017						

## Stage 1: Overview

<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 preferred option is to seek approval for a direct award of a contract for 5 years with the option to extend for a further two years with the current provider to ensure stability and sufficiency of accommodation for 30 Unaccompanied Asylum Seeking Children and young adults.</p> <p>This option will allow us to protect the exceptionally good rates, whilst maintaining placement stability for young people.</p> <p>Through the access to resources commissioning arrangements and the West London Alliance, we can demonstrate that there is limited additional capacity locally – there are only a few vacancies amongst the semi-independent providers and The Provider accommodation is full. With numbers of Looked After Unaccompanied Asylum Seeking</p>
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	Children continuing to increase for our statistical neighbours, London as a whole and England it is likely that Harrow's responsibility for this cohort will continue to grow.			
<b>2. Who are the main groups / Protected Characteristics that may be affected by your proposals? (✓ all that apply)</b>	Residents / Service Users	✓	Partners	Stakeholders
	Staff		Age	Disability
	Gender Reassignment		Marriage and Civil Partnership	Pregnancy and Maternity
	Race		Religion or Belief	Sex
	Sexual Orientation		Other	
<b>3. Is the responsibility shared with another directorate, authority or organisation? If so:</b> <ul style="list-style-type: none"> <li>Who are the partners?</li> <li>Who has the overall responsibility?</li> <li>How have they been involved in the assessment?</li> </ul>	No			

## 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>Profile of Harrow residents at 2011 Census:</p> <p>In 2011 Harrow had a usual resident population of 239,056. 48,060 (20.1%) were aged 0-15, 157,330 (65.8%) were aged 16-64 and 33,670 (14.1%) were aged 65+. 18% of Harrow's households are comprised solely of residents aged 65 and over.</p>	<p>The provision is specifically commissioned for young unaccompanied asylum seekers aged 16-24. The proposal outlined in the cabinet report will not change the age range of the services provided. The provision will be age appropriate for this group.</p>

Disability (including carers of disabled people)	<p>Profile of Harrow residents at 2011 Census:</p> <p>In 2011 Harrow had a usual resident population of 239,056. 34,850 (14.6%) of residents had a limiting long-term illness or disability which limited their day-to-day activities.</p>	<p>Of the 141 Care Leavers 4 have a disability, under 3% of the care leaver population. Individual needs are taken into account when placements are needed for young people with disabilities.</p> <p>The proposal outlined in the cabinet report will not change the support level (low) of services provided, and thus is not likely to impact on this protected characteristic.</p>
Gender Reassignment	<p>Profile of Harrow residents:</p> <p>There is limited data held about this protected characteristic for the population and in relation to these groups and services. The England/Wales Census and Scottish Census have not asked if people identify as transgender. The charity GIRES estimated in their Home Office funded study in 2009 the number of transgender people in the UK to be between 300,000 and 500,000.</p>	<p>The data for this characteristic amongst UASC / leaving care clients is too low to make any generalisations or assumptions. Individual placements are sourced according to the needs of the individual young person.</p> <p>It is not expected that the proposal outlined in the cabinet report will have an adverse impact on any of the protected characteristics</p>
Marriage / Civil Partnership	<p>Profile of Harrow residents at 2011 Census:</p> <p>In 2011 Harrow had a usual resident population of 239,056. Harrow had a very high percentage of married couples. 53.7 per cent of residents (aged 16+) were in a marriage. The borough had lower levels of people with other marital and civil partnership status.</p>	<p>The service supports single care leavers, thus it is not expected that the proposal outlined in the cabinet report will have an adverse impact on any of these protected characteristics</p>
Pregnancy and Maternity	<p>Profile of Harrow residents:</p> <p>ONS births figures show Harrow as having 3,585 live births in 2012. There is limited data held about this protected characteristic for the population and in relation to these groups and services</p>	<p>There is currently no data available to determine number of care leavers who are pregnant. However, given that females represent only 33% of the care leaver population and only 9% of UASC clients (Sept 2017 data), and the age range of the young people, the numbers in this group would be very low. Mother and baby placements have been provided in the past, but for a very short term until a suitable alternative is sourced. If a young person is pregnant or a young parent, suitable accommodation will</p>

<p>Race</p>	<p>Profile of Harrow residents at 2011 Census:</p> <p>In 2011 Harrow had a usual resident population of 239,056. In 2011 44% of residents were Asian. Harrow's Indian group was the borough's largest minority ethnic group, with a population of 63,050 (26.4%). Other Asian groups accounted for 11.3% of Harrow's residents. Sri Lankans were the largest population group in this category in Harrow. 42.2% of residents were White, including 30.9% (73,830) White British. 8.2% of Harrow's residents were categorised in the Other White group, which comprised people from a large variety of backgrounds (mainly from other parts of Europe). 9.7% (23,105) of residents were Black, including Black African (3.6%) Black Caribbean (2.8%) and Other Black (1.8%). 4.1% of residents were included in the Arab and Other grouping.</p>	<p>be sourced to meet their needs and capacity to manage.</p> <p>Provider Residents September 2017</p> <table border="1" data-bbox="1406 225 2152 611"> <thead> <tr> <th>Country of origin</th> <th>Number</th> </tr> </thead> <tbody> <tr> <td>Afghani</td> <td>9</td> </tr> <tr> <td>Albanian</td> <td>5</td> </tr> <tr> <td>Iraqi</td> <td>2</td> </tr> <tr> <td>Eritrean</td> <td>6</td> </tr> <tr> <td>Kuwati</td> <td>1</td> </tr> <tr> <td>Iranian</td> <td>3</td> </tr> <tr> <td>Syrian</td> <td>1</td> </tr> <tr> <td>Moroccan</td> <td>1</td> </tr> <tr> <td>Vietnamese</td> <td>2</td> </tr> </tbody> </table> <p>Placing newly arrived young people in a provision which has multiple rooms and a diversity of residents has meant that young people naturally provide much needed peer support to each other on accessing services, local facilities and learning English. Thus it is not expected that the proposal outlined in the cabinet report will have an adverse impact on any of this protected characteristic</p>	Country of origin	Number	Afghani	9	Albanian	5	Iraqi	2	Eritrean	6	Kuwati	1	Iranian	3	Syrian	1	Moroccan	1	Vietnamese	2
Country of origin	Number																					
Afghani	9																					
Albanian	5																					
Iraqi	2																					
Eritrean	6																					
Kuwati	1																					
Iranian	3																					
Syrian	1																					
Moroccan	1																					
Vietnamese	2																					
<p>Religion and Belief</p>	<p>Profile of Harrow residents at 2011 Census:</p> <p>In 2011 Harrow had a usual resident population of 239,056. Religious affiliation is very high in Harrow. In 2011 37.3% of residents were Christians, 25.3% (60,410) were Hindus, 10,530 (4.4%) were Jewish and 29,880 (12.5%) were Muslims. 5,945 people (2.5%) were followers of Other Religions, including Sikhs, Buddhists, Jains and Zoroastrians. 9.6% (22,870) of residents stated that they had no religion. 6.2% didn't answer this question.</p>	<p>The largest group in this category (34%) followed Islam as their religion. Placing newly arrived young people in a provision which has multiple rooms and a diversity of residents has meant that young people naturally provide much needed peer support to each other including attending places of worship and arranging joint celebrations.</p> <p>Harrow Care Leavers Religion breakdown:</p> <table border="1" data-bbox="1294 1326 1868 1394"> <thead> <tr> <th>Religion</th> <th>Percentage</th> </tr> </thead> </table>	Religion	Percentage																		
Religion	Percentage																					

		<table border="1"> <tr><td>Christian (all denominations)</td><td>26%</td></tr> <tr><td>Not Stated</td><td>23%</td></tr> <tr><td>Islam</td><td>34%</td></tr> <tr><td>Hinduism</td><td>3%</td></tr> <tr><td>Catholic</td><td>4%</td></tr> <tr><td>No Religion / Atheist</td><td>5%</td></tr> <tr><td>Not Known</td><td>3%</td></tr> <tr><td>Buddhism</td><td>1%</td></tr> <tr><td>Judaism</td><td>1%</td></tr> </table> <p>It is not expected that the proposal outlined in the cabinet report will have an adverse impact on any of this protected characteristic</p>	Christian (all denominations)	26%	Not Stated	23%	Islam	34%	Hinduism	3%	Catholic	4%	No Religion / Atheist	5%	Not Known	3%	Buddhism	1%	Judaism	1%
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Buddhism	1%																			
Judaism	1%																			
Sex / Gender	<table border="1"> <thead> <tr><th>Gender</th><th>Count</th></tr> </thead> <tbody> <tr><td>Female</td><td>9</td></tr> <tr><td>Male</td><td>91</td></tr> <tr><td>Total</td><td>100</td></tr> </tbody> </table>	Gender	Count	Female	9	Male	91	Total	100	The majority of young UASC are male, snapshot data from September 2017 shows only 9 out of 100 are female. The provision has placements for both young men and young women.										
Gender	Count																			
Female	9																			
Male	91																			
Total	100																			
Sexual Orientation	Not applicable	Placements are sourced for young people based on individual needs and matching. Factors relating to ethnicity / religion are considered when searching and securing placements. It is not expected that the proposal outlined in the cabinet report will have an adverse impact on any of this protected characteristic																		

### 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	Disability	Gender	Marriage	Pregnancy and	Race	Religion and	Sex	Sexual
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	(including carers)	(including carers)	Reassignment	and Civil Partnership	Maternity		Belief		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
Social Workers	The provision meets the needs of the young people in placement and additional support is provided by LINAB service as required.	
Young people – Leaving Care Forum	Feedback was not specific to any particular protected characteristics but included: Young people said that their views about placements should be taken into account	Social workers will continue to engage young people in discussion about their placement as well as IRO's and participation officer.  Placements will continue to be sourced on an

	<p>The services are used by a diverse range of young people and mostly meet their needs.</p> <p>Young people believe that it is important that placements have a mix of young people (gender)</p> <p>Young people have the skills to move to independence.</p>	<p>individual basis according to need - some young people need single sex placements due to their vulnerabilities, others are able to and progress well in mixed units. The provision has a mix of more independent flats and rooms with shared bathrooms. This provides flexibility and rooms are allocated according to individual needs as well as offering mixed accommodation.</p> <p>Not specific to a characteristic – but a universal issue. Specifications and monitoring of performance will address this issue.</p>
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### 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 occur.  <b>Note – Positive impact can also be used to demonstrate how your proposals meet the aims of the PSED Stage 7</b>	What measures can you take to mitigate the impact or advance equality of opportunity? E.g. further consultation, research, implement equality monitoring etc <b>(Also Include these in the Improvement Action Plan at Stage 6)</b>
		Minor ✓	Major ✓		
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					

<b>8. 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?  If yes, which Protected Characteristics could be affected and what is the potential impact?	Yes		No	✓	
<b>9. 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?  If yes, what is the potential impact and how likely is it to happen?	Yes		No	✓	
<b>Stage 6 – Improvement Action Plan</b>					
List below any actions you plan to take as a result of this Impact Assessment. These should include: <ul style="list-style-type: none"> <li>Proposals to mitigate any adverse impact identified</li> <li>Positive action to advance equality of opportunity</li> <li>Monitoring the impact of the proposals/changes once they have been implemented</li> <li>Any monitoring measures which need to be introduced to ensure effective monitoring of your proposals? How often will you do this?</li> </ul>					
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	
Gender	Monitor use of the provision by protected characteristic groups to ensure equality of access and service is responsive to meet the needs of males and females.	1) Develop new KPI's for the service 2) Monitoring reports 3) Monitoring visits 4) Service user feedback	Access to resources team & Leaving Care and UASC Team	April 2018	

Ethnicity	Monitor progress and outcomes of all young people placed at the provision to ensure the needs of all young people are met.	1) Develop new KPI's for the service 2) Monitoring reports 3) Monitoring visits 4) Service user feedback	Access to resources team & Leaving Care and UASC Team	April 2018
Disability	Monitor use of the provision for young people with disabilities to ensure equality of access where the provision meets the needs of the individual and services are responsive to meet the needs of such groups.	1) Develop new KPI's for the service 2) Monitoring reports 3) Monitoring visits 4) Service user feedback	Access to resources team & Leaving Care and UASC Team	April 2018

### Stage 7: Public Sector Equality Duty

**10.** How do your proposals meet the Public Sector Equality Duty (PSED) 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

This provision of placements for UASC assists young people to live independently and therefore contributes to equality of opportunity. We propose to continue to support this target group.

### Stage 8: Recommendation

**11.** 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 included in the Action Plan to be addressed.

**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 <b>outcome 3</b> explain your justification with full reasoning to continue with your proposals.	
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**Stage 9 - Organisational sign Off**

13. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?			
Signed: (Lead officer completing EqIA)	Claire Kentish	Signed: (Chair of DETG)	J.Morgan
Date:	31/10/17	Date:	8.11.17