

You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the <u>guidance notes</u> and ensure you have followed all stages of the EqIA approval process. Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Borough profile data and other sources of statistical information on each group can be found on the Harrow hub, within the section entitled: Equality Impact Assessment - <u>Borough profile data</u> and other sources of information to help you complete your EqIA template.

Equality Impact Assessment (EqIA)					
Type of Decision:	○ Portfolio holder				
Title of Proposal	Tenant Services Charges Review	Date EqlA created: 21 August 2018			
Value of savings to be made (if applicable):	Aim to charge full costs for services provided.				
Name and job title of completing/lead Officer	Karen Connell, Head of Resident Services				
Directorate/ Service responsible	Community/Housing				
Organisational approval					
EqIA approved by Directorate Equality Task Group (DETG) Chair	Name: Johanna Morgan	Signature Tick this box to indicate that you have approved this EqIA Date of approval 24 August 2018			

1. Summary of proposal, impact on groups with protected characteristics and mitigating actions (to be completed after you have completed sections 2 - 5)

a) What is your proposal?

Review the current position of the Council's Housing Revenue Account (HRA) Tenant Service Charges and propose the cost of services provided is fully recovered. It is essential tenants are charged appropriately.

b) Summarise the impact of your proposal on groups with protected characteristics

We are still working on a financial model to identify the impact of the review on the protected characteristics and agree mitigations. At this point we can say the impact is anticipated to be mainly minor due to the number of tenants in receipt of housing benefit.

c) Summarise any potential negative impact(s) identified and mitigating actions

In the event of any hardship an increase in service charges to tenants (including tenants residing in sheltered accommodation) can be mitigated by a phased increase. Tenants will receive support from dedicated Housing Officers to manage their rent accounts on the basis of their circumstances which will include equality and opportunity.

70% of Harrow tenants are in receipt of full or partial housing benefit which will also mitigate any financial strain on our vulnerable tenants. This is because most of the current and any new costs, as charges for communal services or shared areas, will be able to be included in the rent and therefore able to be claimed from the Department of Work and Pensions.

2. Assessing	impact					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to borough profile data, equalities data, service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on each group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact				
Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the	Negati			Negative impact	
	outcome of your analysis.	Positive impact	Minor	Major	No impact	
Age	A financial model is currently in process and is not completed. The data from this model will be the base to populate any impact this proposal will make on any of the groups. Our Business Information Unit are unable to help with detailed analysis required until they have the result of the financial modelling. Once this data is received the action will be to close the gap on the data required.				Until the evidence from the financial planning is received	
Disability	A financial model is currently in process and is not completed. The data from this model will be the base to populate any impact this proposal will make on any of the groups. Our Business Information Unit are unable to help with detailed analysis required until they have the result of the financial modelling. Once this data is received the action will be to close the gap on the data required.				Until the evidence from the financial planning is received	
Gender reassignment	A financial model is currently in process and is not completed. The data from this model will be the base to populate any impact this proposal will make on any of the groups. Our Business Information Unit are unable to help with detailed analysis required until they have the result of the financial modelling. Once this data is received the action will				Until the evidence from the financial planning	

	be to close the gap on the data required.	is received
Marriage and Civil Partnership	A financial model is currently in process and is not completed. The data from this model will be the base to populate any impact this proposal will make on any of the groups. Our Business Information Unit are unable to help with detailed analysis required until they have the result of the financial modelling. Once this data is received the action will be to close the gap on the data required.	Until the evidence from the financial planning is received
Pregnancy and Maternity	A financial model is currently in process and is not completed. The data from this model will be the base to populate any impact this proposal will make on any of the groups. Our Business Information Unit are unable to help with detailed analysis required until they have the result of the financial modelling. Once this data is received the action will be to close the gap on the data required.	Until the evidence from the financial planning is received
Race/ Ethnicity	A financial model is currently in process and is not completed. The data from this model will be the base to populate any impact this proposal will make on any of the groups. Our Business Information Unit are unable to help with detailed analysis required until they have the result of the financial modelling. Once this data is received the action will be to close the gap on the data required.	Until the evidence from the financial planning is received
Religion or belief	A financial model is currently in process and is not completed. The data from this model will be the base to populate any impact this proposal will make on any of the groups. Our Business Information Unit are unable to help with detailed analysis required until	Until the evidence from the

	they have the result of the financial modelling. Once this data is received the action will be to close the gap on the data required.				financial planning is received
Sex	A financial model is currently in process and is not completed. The data from this model will be the base to populate any impact this proposal will make on any of the groups. Our Business Information Unit are unable to help with detailed analysis required until they have the result of the financial modelling. Once this data is received the action will be to close the gap on the data required.				Until the evidence from the financial planning is received
Sexual Orientation	A financial model is currently in process and is not completed. The data from this model will be the base to populate any impact this proposal will make on any of the groups. Our Business Information Unit are unable to help with detailed analysis required until they have the result of the financial modelling. Once this data is received the action will be to close the gap on the data required.				Until the evidence from the financial planning is received
	e impact – considering what else is happening within the Council and Harrow ative impact on groups with protected characteristics? No	as a wl	nole, cou	ld your pr	oposals
people aged be	nentation of Universal Credit in Harrow from July 2018. Universal Credit is a single elow the pension age for women (currently about 64). It includes payments to help childcare costs (for workers only) In most cases it is paid calendar monthly direct	with da	aily living	costs, as w	vell as

benefit instead of six smaller and different benefits. National benchmarking has shown that tenants have found it difficult to manage their finances from this one benefit by receiving too much money at once. Local authorities have found this a challenge to manage.

The potential impact of the review and the introduction still remains minor due to the number of tenants receiving housing benefit.

3. Actions to mitigate/remove negative impact

Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for each group, identified in section 2. In addition, you should also consider and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer

4. Public Sector Equality Duty

How does your proposal 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

Pursuant to the Equality Act 2010 ("the Act"), the council, in the exercise of its functions, has to have 'due regard' to (i) eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; (ii) advancing equality of opportunity between those with a relevant protected characteristic and those without; and (iii) fostering good relations between those with a relevant protected characteristic and those without. The relevant protected characteristics are age, race, disability, gender reassignment, pregnancy and maternity, religion or belief, sex and sexual orientation. The duty also covers marriage and civil partnership, but to a limited extent.

When making decisions, the Council must take account of the equality duty and in particular any potential impact on protected groups. There are no new equality impacts at this stage of the recommended rent, service charge and fees and charges proposals option as they represent a continuation of existing policy, with the exception of the rent reduction which is now implemented via primary legislation. Consultation with our tenant and resident representative groups on the review proposals has occurred since May 2018, including Housing Matters in July 2018. There are more planned particularly with our sheltered housing tenants.

5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies

Outcome 1