

**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 [guidance notes](#) 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 - [Borough profile data](#) and other sources of information to help you complete your EqIA template.

Equality Impact Assessment (EqIA)		
Type of Decision:	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
Title of Proposal	Harrow Regeneration Programme	Date EqIA created 11 April 2019
Value of savings to be made (if applicable):		
Name and job title of completing/lead Officer	Jan Rowley, Regeneration Programme Director Interim	
Directorate/ Service responsible	Community Directorate	
Organisational approval		
EqIA approved by Directorate Equality Task Group (DETG) Chair	Paul Walker, Corporate Director Community	<b>Signature</b> <input type="checkbox"/> <b>Tick this box to indicate that you have approved this EqIA</b>  <b>Date of approval</b>

## 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?

*The London Borough of Harrow Regeneration Strategy 2015-2026* was published in 2015. It sets out broad objectives and a number of strategic actions for regeneration within the Heart of Harrow/Harrow and Wealdstone Opportunity Area with a view to achieving the Council's Building a Better Harrow vision established in the *Harrow Ambition Plan 2020*.

The Strategy has three 'core objectives':

1. Place – Providing the homes, schools and infrastructure needed to meet the demands of our growing population and business base, with high quality town and district centres that attract business investment and foster community engagement
2. Communities – Creating new jobs, breaking down barriers to employment, tackling overcrowding and fuel poverty in our homes and working alongside other services to address health and welfare issues
3. Business – Reinforcing our commercial centres, promoting Harrow as an investment location, addressing skills shortages and supporting new business start-ups and developing local supply chains through procurement.

Seven 'strategic actions' are described in order to achieve the objectives:

1. Delivering our action plan for the 'Heart of Harrow'
2. Accelerating the pace of housing delivery
3. Exploiting the Council's property assets
4. Implementing the Homes for Harrow Programme
5. Improving Harrow's strategic accessibility
6. Investing in improved infrastructure
7. Maximising local economic benefits from communities and businesses.

The aim of the Regeneration Programme (this proposal) is to deliver on the actions and objectives described above by building new homes, making the best commercial value of the assets, stimulating the local economy, and giving the local community a sense of place. We will do so by accelerating the implementation of the Council's Core Strategy and Area Action Plan which have also been subject to extensive stakeholder engagement and to equalities impact assessments.

Regeneration Programme activity across the borough will be achieved through a range of public and private partners.

The Regeneration Programme is currently focussed on five key projects: two in delivery (Haslam House and Waxwell Lane – both of which have their own focussed EQIAs) and three in development (Poets' Corner, Peel Road Car Park/Harrow New Civic, Byron Quarter – covered by this EQIA).

In total, these sites will realise accelerated and additional delivery of approximately 1,800 new homes within the Heart of Harrow. This investment will also contribute to the creation of over 500 jobs, through new employment and community floor space, and will secure delivery of essential infrastructure to serve both the Heart of Harrow area and the borough, including:

- A new school
- A new civic centre
- Improved leisure facilities
- New and enhanced public realm
- Approximately 100 elderly Extra Care homes.

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

There will be a positive impact as a result of the implementation of the Regeneration Programme. The programme significantly accelerates and increases the delivery of housing (particularly affordable housing), which is a key pledge of the Council. The additional employment created, both during construction and through the provision of new employment and commercial workspace, helps to address the key pledge to create over 500 jobs and apprenticeships in Harrow to support our young people into work. The increase in primary school provision and the investment in leisure and sports facilities, as well as the further work on the Green Grid, will also contribute to the educational and healthy wellbeing of those living, working and learning in Harrow.

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

The proposals and policies being advocated through the Plan do not result in any disproportionate disadvantage to any specific group.

<b>2. Assessing impact</b>					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to <a href="#">borough profile data</a> , <a href="#">equalities data</a> , 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 <b>each</b> 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			
<b>Protected characteristic</b>	For <b>each</b> 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 outcome of your analysis.	Positive impact	<b>Negative impact</b>		No impact
			Minor	Major	
<b>Age</b>	<p>Profile of Harrow residents at 2011 Census: From a 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. Harrow has an ageing population and the number of people aged 65+ is projected to increase by 25% over the next 12 years.</p> <p>On each project extensive consultation and engagement will be undertaken – providing specific data on localised impact.</p> <p>New development will provide opportunities for construction jobs and apprenticeships for all ages. Partners and consultants engaged on projects will have a social value commitment to make sure apprentices are included as part of their delivery strategy.</p> <p>The following reports identified the need to develop apprenticeships and address the changing demographics of the workforce:</p> <p>Chartered Institute of Building Inquiry into Skills in the UK Construction Industry<sup>i</sup>, EC Harris, 2014, London Prime Residential Development Pipeline: The race to secure</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p>capacity</p> <p>COIB report: Skills in the UK Construction industry, April 2013.</p>				
<b>Disability</b>	<p>The 2011 census states 34,850 (14.6%) Harrow residents had a limiting long-term illness or disability which limited their day-to-day activities.</p> <p>Many households in London require accessible or adapted housing to lead dignified and independent lives (English Housing Survey). To provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children, residential development must ensure that: at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings', i.e. designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users; and all other new build dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' (London Plan).</p> <p>Additionally in Harrow, 10% of all London Affordable Rent units should be designed for occupation by a wheelchair user immediately upon completion and allocated parking is mandatory for wheelchair homes (Harrow Affordable Housing Planning Obligation and Housing Needs Assessment 2014).</p> <p>Implementing the Regeneration Strategy will ensure support for business start-up and growth. Self-employment and starting a business can be a particularly effective alternative to employment or unemployment for some groups such as those with disability - two-thirds of business owners (66%) think that working for themselves is important for being able to live where they would like; 54% for working around their own physical health conditions; and 37% for being able to care for older relatives (RSA/Populus microbusiness survey March 2014).</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Gender reassignment</b>	<p>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>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Vitality Profiles, GLA Datasets, Local Economic Assessment reviewed no data to determine impact. Although improving infrastructure; housing, transport, schools, creating jobs and improving access to employment, skills development, and business start-up will be of universal benefit				
<b>Marriage and Civil Partnership</b>	<p>Profile of Harrow residents at 2011 Census: 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>Vitality Profiles, GLA Datasets, Local Economic Assessment reviewed no data to determine impact. Although improving infrastructure; housing, transport, schools, creating jobs and improving access to employment, skills development, and business start-up will be of universal benefit.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Pregnancy and Maternity</b>	Vitality Profiles, GLA Datasets, Local Economic Assessment reviewed no data to determine impact. Although improving infrastructure; housing, transport, schools, creating jobs and improving access to employment, skills development, and business start-up will be of universal benefit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<p><b>Race/ Ethnicity</b></p>	<p>Addressing the skills base of low paid workers through regeneration would have a positive impact on addressing income equality for BAME groups, which experience the highest levels of low pay in London; it would also help to address the ESOL needs, which have been identified as a barrier to employment (ESIF Programme for Basic Skills and Job readiness). See also evidence base for Socio Economic groups.</p> <p>The wards with the lowest life expectancy, highest unemployment, fuel poverty, and greatest overcrowding are predominantly in the Heart of Harrow Opportunity Area. Addressing these issues through the implementation of our regeneration strategy will have a positive impact on this Protected Characteristics.</p> <p>Greenhill, Roxbourne and Wealdstone wards have the lowest life expectancy in Harrow. Life expectancy has actually decreased in Greenhill and West Harrow. Unemployment figures are also highest in Greenhill, Wealdstone and Roxbourne wards and overcrowding is highest in Greenhill, Marlborough and Edgware. At ward level Marlborough (191) and Wealdstone (135) have the highest number of households in need of re-housing. These respectively have a BAME population of 77% and 75%.</p> <p>The highest rates of overcrowding is in Greenhill (97.5 per 1,000 households) and a BAME population of 74% (2011 census)</p> <p>The data shows a relationship between life expectancy, unemployment, fuel poverty and overcrowding which. The wards in which the above occur have high BAME populations. Addressing unemployment and housing need in the Opportunity Area will have a positive impact for this protected characteristic.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Religion or belief</b></p>	<p>The 2011 Census revealed that religious affiliation is very high in Harrow; at 9.6%, the borough has the 2nd lowest number of residents who stated that they have no religion. This compares to 24.7% nationally.</p> <p>The faith breakdown in the opportunity area tends to mirror the rest of the borough, although there are proportionately more followers of Islam in the Opportunity Area, and slighter lower Hindus. Initiatives to improve infrastructure; housing, transport, schools,</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



	create jobs and improve access to employment, skills development, and business start-up will be of universal benefit to all within this characteristic. There is a higher proportion of Bangladeshi and Pakistanis who tend to be followers of Islam. Those ethnic groups have lower economic activity levels (66%) than Indians (72%) and the borough average (78%).				
<b>Sex</b>	<p>In 2011, 49.4% of Harrow residents were male and 50.6% are female. This is very similar to the national profile, but the number of males in Harrow has slightly increased since 2001 (Office for National Statistics, 2001 and 2011).</p> <p>The regeneration strategy sets out actions to promote business growth and self-employment, traditionally women and BME groups tend to be underrepresented as business owners in both the UK and London. It is estimated that only 18.0 per cent of SMEs are majority women-led and 6.3 per cent of SMEs are minority ethnic group led (BIS, <i>Small Business Survey 2012: businesses led by women and ethnic minorities</i>, March 2013)</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Sexual Orientation</b>	Vitality Profiles, GLA Datasets, Local Economic Assessment reviewed no data to determine impact. Although improving infrastructure; housing, transport, schools, creating jobs and improving access to employment, skills development, and business start-up will be of universal benefit	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?</b></p> <p><input type="checkbox"/> Yes                      No    <input checked="" type="checkbox"/></p>					
<p>If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below</p>					

### 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 <b>each</b> 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

1. Improve volume and quality of Private Sector Housing stock mitigating potential discrimination, harassment and victimisation of tenants.
2. Address the barriers to employment, self-employment and escape low pay. Address housing shortages
3. Universal service provision to programmes addressing socio economic disadvantage.

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

**Outcome 1**

**No change required: the EqIA has not identified any potential for disproportionate impact and all opportunities to advance equality of opportunity are being addressed**

**Outcome 2**

**Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4**

**Outcome 3**

**This EqIA has identified missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.**

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<sup>i</sup> CIOB: