**Equality Impact Assessment (EqIA) November 2018**



**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](https://harrowhub.harrow.gov.uk/downloads/file/9302/eqia_guidance_notes) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1).

Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](https://harrowhub.harrow.gov.uk/info/200341/equality_impact_assessments/1604/data_guide_-_inequality_impact_assessment) - sources of statistical information.

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| **Equality Impact Assessment (EqIA)** | | |
| **Type of Decision**: |  | |
| **Title of Proposal** | Harrow New Civic Centre and Accommodation Strategy | **Date EqIA created** May 2021 |
| **Name and job title of completing/lead Officer** | Julian Wain – Interim Commercial Development Director | |
| **Directorate/ Service responsible** | Communities | |
| **Organisational approval** | | |
| **EqIA approved by Directorate Equalities Champion** | **Name** | **Signature**    **Tick this box to indicate that you have approved this EqIA**  **Date of approval** |

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| 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 proposal is to establish the Council’s Accommodation Strategy for the future including the development of the Harrow New Civic Centre. The Council has resolved to develop three Core sites in Wealdstone, and to erect a new Civic Centre at Peel Road to replace the dated and soon to be obsolete Civic Centre at Poets Corner.  The Council plans to locate its principle staff area at Forward Drive Depot, which is the Council’s newly redeveloped depot and office space. This will be the principal area for staff to work, meet and collaborate. This will begin to be occupied from completion in October 2021. Staff will be able to work on an agile basis from the office, from other Council sites, from home and in non-specific locations to suit. It is anticipated that they will attend the main office on average 2.5 days per week.  In the short-term public facing services will be delivered from other existing Council sites, as well as predominantly by digital channels. When the new Civic Centre opens in 2025 this will be the Councils public face and transactions with the public will take place there.  Staff will visit the Civic Centre as and when required for meetings, for interaction with the public and for interaction with elected members. |
| **b) Summarise the impact of your proposal on groups with protected characteristics**  The Council’s approach to flexible and agile working has a generally overall positive effect and given the state of the art design of new buildings the approach will have benefits for all staff and client groups. For some groups there is no impact. There are no major negative impacts and all minor impacts can be mitigated. |
| **c) Summarise any potential negative impact(s) identified and mitigating actions**  Negative impacts and actions to mitigate are sety out in detail in section 2 and in summary in section 3. |

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| **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](https://harrowhub.harrow.gov.uk/info/200341/equality_impact_assessments/1604/data_guide_-_inequality_impact_assessment), [equalities data](http://www.harrow.gov.uk/info/200251/community_and_living/863/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 outcome of your analysis. | Positive impact | **Negative**  **impact** | | No impact |
| Minor | Major |
| **Age** | Residents  Harrow profile:  20 per cent of Harrow’s residents are aged under 16 (48,200).  65.9 per cent (158,400) of Harrow’s population fall within the working age bracket (16 to 64) and 14.1 per cent (33,900) of Harrow’s residents are 65 years of age and older.  The average (median) age in Harrow is approximately 36 years, which ranks Harrow 284th out of 348 local or unitary authorities for age, depicting a younger average than the majority of local authorities.  A high percentage of our customers are on housing benefit and council tax support, the breakdown below is relevant for this assessment.  The Housing Benefit /Council Tax Support caseload is made up of 15,032 (73%) working age households and 5,652 (27%) pensioner.  An average of 5,500 new claims are made every year of which 85% are made by working age households, and 15% by pensioners.  Less than 250 residents visit the Civic Centre to access a service and supported self-service offer will be initially be available at Greenhill library with a view to operate across the library network when appropriate.  A suitable location for Homelessness, Adult Social Care and Childrens’ Services is being assessed.  The new HNC will have facilities designed to accommodate people with disabilities and mobility issues and will be user friendly.  There may be some minor impact on residents as a result of the reduction of available car parking spaces in Wealdstone. However, the Council is mitigating this by expoloring the development of such additional parking spaces as is feasible.Wealdstone in general, and Peel Road are well served with public transport. In the short term the interim facilities will be in suitable existing Council buildings and will be those with existing car parking and associated facilities. Individual equality impact assessments will be carried out on each of these locations.  Staff    Any minor impact on staff as a result of the reduction of car parking will be mitigated by the spaces available at Forward Drive, together with the potential provision of pool cars. Forward Drive has adequate public transport and Peel Road is in the highest PTAL rating.  The adoption of flexible and agile working may give rise to minor impacts on older staff who may struggle with new IT when working at home without a support network around them.  This will be mitigated by the IT adoption officer available through IT.  Younger (more junior) staff are more likely to be in shared accommodation and therefore not have a suitable area to work in. However, it should be remembered that the policy is not to require staff to work from home but to offer a mixed opportunity of work from home, Forward Drive, other Council spaces and non specific venues outside the Council estate subject to the requirements of their role. |  |  |  |  |
| **Disability** | Harrow profile:  17.3% of Harrow’s working age population (16-64) classified themselves as disabled within the 2011-12 period (July to June), a total of 26,600 individuals. This signifies a decrease of 4.6% for the same period in 2010-11.  13,800 (17.3%) are men and 12,900 (17.7%) are women  Housing Benefit/Council Tax Support claimants in receipt of Disability Living Allowance, Severe Disablement Allowance or Employment Support Allowance (Support Component) are classified disabled under the regulations.  4,826 households fall under this category.  The proposals for office/collaboration space are likely to have a positive impact on this group. Both buildings are being designed and built to current disability standards and disabled parking will be available at both venues. This will also be true of additional touchdown space and service delivery points, each of which will be assessed to ensure that they meet relevant standards and have the appropriate facilities for all client groups and all staff needs.  For public facing services the public areas will be fitted out to meet the needs of all client groups. This is likely to include   * Adjustable desk heights   + Seating area for those who require seats.   + Wheelchair accessible .   + Hearing Loop   + Plasma Screen meeting audio and visual needs   + Larger computer screens with the ability to increase the size of the text on screen   + Fully functioning keyboards and mice. Ergonomic workstations (2)   + Access to disabled toilets.   + Rooms available for privacy.:   **Staff**    Forward Drive, as the main collaboration workspace, is being designed with access in mind. Touchless building controls for doors, etc, will make moving around the building easier for those with physical disabilities. Ergonomic chairs that will better meet the needs of the majority of staff are being purchased minimising the need for specially adapted chairs, while the range of work settings and the limited time period that staff are expected to use them should help reduce physical strain on people. Hearing loops are proposed for all the main group collaboration areas. The use of a dyslexia friendly font for signage is being considered. The access procedures for shared workplace are being developed and will be consulted on with DAWN and MADG. The personal risk assessment process will need to be followed for those with more specific accessibility needs that cannot be met through these measures. Similar considerations will apply in the HNC at Peel Road.  For those periods of time when staff with disabilities are working from home individual risk assessments will be carried out and reasonable adjustments to facilitate their adopting the agile working made as necessary.  There are currently 6 disabled parking bays at Palmerston Road, and this number of surface spaces will be replicated in surface parking for the new HNC. In addition there will be 5 disabled spaces at Forward Drive. While this is a reduction on the 12 available at the present Civic Centre, and thus a minor negative impact, this should be mitigated by the new working patterns of agile working. In addition demand for spaces will be monitored on an ongoing and continuous basis, and the option is available to increase the number of disabled spaces available should this be necessary. |  |  |  |  |
| **Gender**  **reassignment** | The proposals for office/ collaboration space will have a minor impact on this group as at present there are no gender neutral toilets or showers at Forward Drive Depot and this is an area of concern that will require monitoring. In the longer term the new HNC will be designed to modern standards and will have gender neutral toilets. Consideration will be given to the allocation of existing toilets and the situation monitored for further review six months from opening.  The proposals for public facing services will have no impact on this group |  |  |  |  |
| **Marriage and Civil Partnership** | The proposals for office/ collaboration space will have no impact on this group.  Consideration is currently being given to the site for the registrar service on an interim basis.It is likely that this will also be the site for this service to be relocated on a permanent basis, to an improved site owned by the Council and in the long term this may have a positive impact.  **Profile of Harrow residents at 2011 Census** |  |  |  |  |
| **Pregnancy and Maternity** | The Council’s flexible and agile approach to working will have a positive impact on this group, allowing work from home and at Council offices and where feasible at non Council sites. Staff in this category may receive personal risk assessment for the provision of car parking where necessary. Adequate public transport is available to Forward Drive Depot and excellent public transport to Peel Road in the longer term. Facilities will be available for nursing mothers.  For public service there will be no impact in the short or long term as in the period until the opening of Peel Road HNC services will be available from Council locations with suitable transport and parking. Peel Road has excellent transport links and the highest PTAL rating. Consideration is currently being given to the location of registrar services for registration of births, and this will be located in an accessible existing Council building. It should also be noted that there is a low level of birth registration within Harrow, as the main maternity hospital is located outside the Borough. |  |  |  |  |
| **Race/**  **Ethnicity** | **Ethnicity overview – employees:**  The breakdown of Council staff by ethnic origin is set out below as at March 2020.  Composition of staff group by ethnic origin (highest level of detail)      The largest group by ethnic origin is White English, followed by Asian Indian, then Black Caribbean.  It is likely that the Council’s flexible and agile approach to working will have a positive impact on all staff allowing work from home and at venues to suit. The venues at Forward Drive and Peel Road are Wealdstone based and are well served by public transport with appropriate feasible car parking.  There will be no impact on this group in terms of the proposals for office/ collaboration space.  It may be that staff within this protected group are more likely to be in shared or multi generational accommodation and therefore not have a suitable area to work in. However, it should be remembered that the policy is not to require staff to work from home but to offer a mixed opportunity of work from home, Forward Drive, other Council spaces and non specific venues outside the Council estate subject to the requirements of their role. This should mitigate any minor negative impact.  For public service there will be no impact in the short or long term as in the period until the opening of Peel Road HNC services will be available from Council locations with suitable transport and parking. Peel Road has excellent transport links and the highest PTAL rating.  A venue for citizenship ceremonies is currently under consideration. This will be based in existing Councvil buildings with good public transport links and is not expected to have any negative impact |  |  |  |  |
| **Religion or belief** | The proposals for public facing services will have a minor negative impact on this group. The removal of car parking at Poets Corner will have an effect on those attending the Harrow Central Mosque in Station Road as it will no longer be available for use, although there is no contractual right for this. Mitigation is being provided through discussions of alternative solutions, potentially park and ride from a town centre site or from dispersed sites.  Similar considerations will apply to the ISSC Temple as a result of the redevelopment of Peel Road and Palmerston Road Car Parks. The ISSC are in ongoing discussions with the Council as part of their relocation and have been part of a landswap deal with the Council.  As noted above the location for the registrar service is currently being considered. This will be located in existing Council buildings with all appropriate facilities and access.  For staff there is no impact on this group.  Space will be devoted at Forward Drive and at the HNC enabling multi faith prayer for staff who wish to utilise this facility. |  |  |  |  |
| **Sex** | The proposals for public facing services will have no impact on this group.  For staff any negative impact from the loss of the extent of car parking will be mitigated by the Council’s approach to the improvements of Wealdstone town Centre including lighting, the provision of car parking spaces as feasible and appropriate and the secured by design approach to both buildings. Female staff may be more likely to have caring responsibilities to to head up single parent families, therefore more flexibility in terms of working from home and other locations is expected to have a positive impact. |  |  |  |  |
| **Sexual Orientation** | The proposals for office/ collaboration space will have a minor impact impact on this group as at present there are no gender neutral toilets or showers at Forward Drive Depot and this is an area of concern that will require monitoring. In the longer term the new HNC will be designed to modern standards and will have gender neutral toilets. Consideration will be given to the allocation of existing toilets and the situation monitored for further review six months from opening.  The proposals for public facing services will have no impact on this group |  |  |  |  |
| **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?**  **Yes, No** | | | | | |
| 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 | | | | | |
| **2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?**  **Yes, No** | | | | | |
| If you clicked the Yes box, Include details in the space below | | | | | |

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| **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 |
| Reduction of car parking | Consideration of pool cars  Assessment of feasibility for further spaces  Individual risk assessment for buildings  Secured by Design  Town centre improvements  Monitoring of take up and demand for disabled parking  Search for alternative solutions for the Harrow Central Mosque | Ongoing risk and equalities impact assessments | To be reviewed in 6 months | Mike Butler/ HSDP Project Team/Rahim St.John |
| Lack of IT support at home | IT Support officer  Remote IT control | Ongoing risk and equalities impact assessments | To be reviewed in 6 months | Ben Goward |
| Difficulty in finding suitable work space at home | Mixed opportunity for work space | Ongoing risk and equalities impact assessments  Actions arising from the risk assessments relating to the building including making of reasonable adjustments | To be reviewed in 6 months.  As above | Tracey Connage  Rahim St John |
| Absence of gender neutral toilets in Forward Drive | Potential reallocation of toilets on certain floors | Ongoing monitoring and further risk and equalities impact assessments | To be reviewed in six months of opening | Tracey Connage/ Rahim St. John |
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| **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 |
| **Include details in the space below**   The Council’s Accommodation Strategy will provide high quality modern office accommodation for staff and public alike which will enable flexible and agile working for people from all the different groups and equality of access to services for all. |

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| **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 unlawful conduct or 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 discrimination and/ or 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.** |
| Include details here |