

## Appendix C

### Equality Impact Assessment (EIA) September 2021



#### You will need to produce an Equality Impact Assessment (EIA) 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 EIA 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 EIA 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](#) - sources of statistical information.

Equality Impact Assessment (EIA)		
<b>Type of Decision:</b>	<input type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input checked="" type="radio"/> Other (state) Overview & Scrutiny	
<b>Title of Proposal</b>	Draft Race Equality in Harrow	<b>Date EIA created September 2021</b>
<b>Name and job title of completing/lead Officer</b>	Shumaila Dar, Head of Equality, Diversity and Inclusion	
<b>Directorate/ Service responsible</b>		
Organisational approval		
<b>EIA approved by:</b>	<b>Name: Shumaila Dar, Head of Policy, Equality, Diversity and Inclusion</b>	<b>Signature</b> <input checked="" type="checkbox"/> <b>Tick this box to indicate that you have approved this EIA</b>  <b>Date of approval 07/09/2021</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 Race Equality in Harrow Council report and Race Equality Action Plan sets out the council's strategic vision around race equality, launching a series of new corporate objectives for the organisation, which will ensure our policies and practices are fair and equitable for all staff in order to promote a workforce that is inclusive and accessible for everyone. Over the past year, we have examined our role as an employer, actively engaging with staff to understand their experiences and the challenges they face and looked closely at our workforce data to examine gaps, bottlenecks and glass ceilings in the organisations. This evidence has given us ground-breaking insight into our organisation, which for the first time, has helped us shape a strategy around race equality that is rooted in evidence and produced in collaboration with staff.

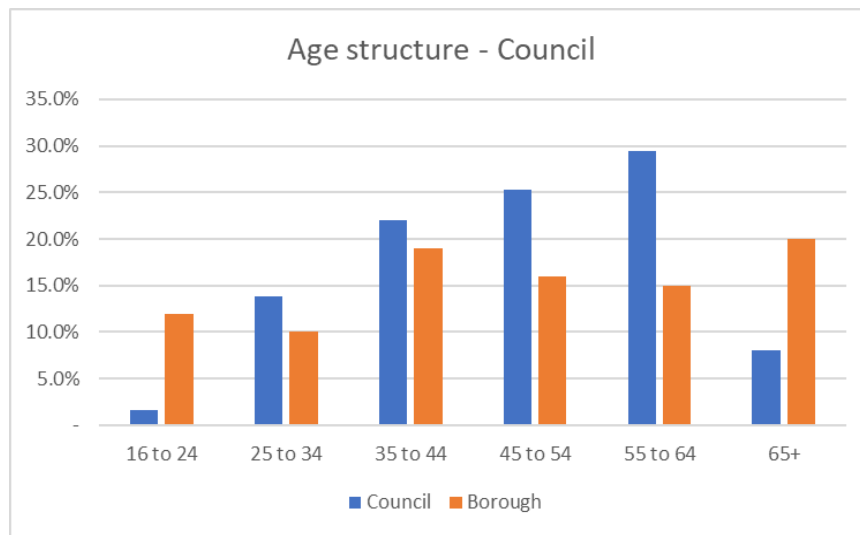
### b) Summarise the impact of your proposal on groups with protected characteristics

- The report sets out the council's strategic vision around race equality, launching a series of new corporate objectives for the organisation for Black, Asian and Multi-ethnic staff.
- The report will form the framework that underpins our strategic work on equality, diversity, and inclusion, to ensure the council's policies and practices are fair and equitable for all staff in order to promote a workforce that is inclusive and accessible for everyone.
- Based on the data available we do not anticipate that the Race Equality Action Plan will have a negative impact on council staff, or result in any direct or indirect discrimination of any group that shares protected characteristics.

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

While the EIA process has not identified any negative impacts on groups with protected characteristics, it is important to note that the strategic approach that we have taken acts as a framework that will underpin the council's forthcoming *Equality, Diversity and Inclusion Strategy*, which will be produced early next year. We expect there to be a positive ripple impact on all other protected characters as a result of this work.

<b>2. Assessing impact</b>					
<p>You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to <u>borough profile data</u>, <u>equalities data</u>, 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.</p>		<p>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</p>			
<b>Protected characteristic</b>	<p>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.</p>	Positive impact	<b>Negative impact</b>		No impact
			Minor	Major	
<b>Age</b>	<p>Compared with the Borough population, there is an under-representation of 16 to 24-year-olds in the workforce but an over-representation of those 55 to 64 and 45 to 54. The other bands are closer. Not all 16-24 year-olds- would be available for work. Note that the Borough figure for 65+ includes all higher ages.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

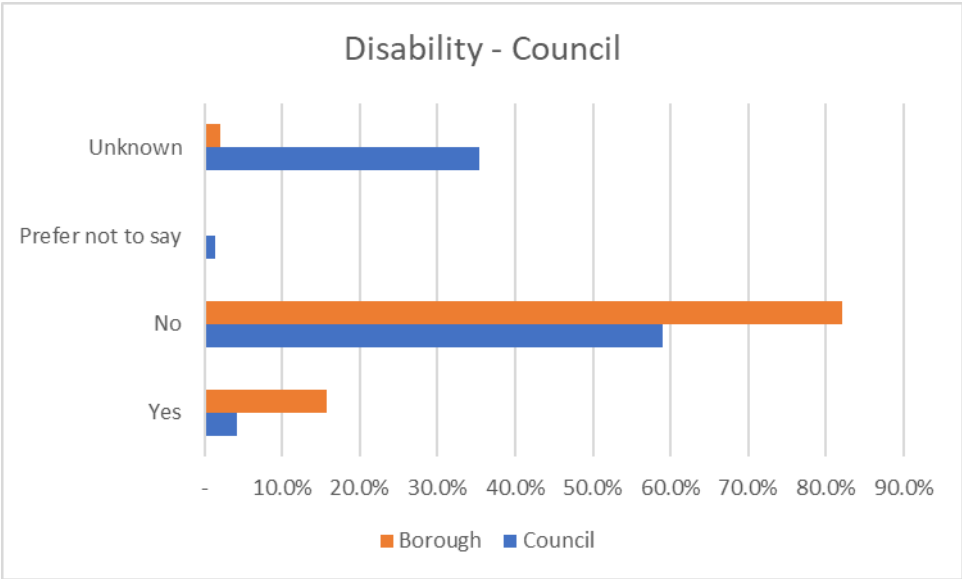


**Impact**

While the EIA process has not identified any negative impacts on groups with protected characteristics, it is important to note that the strategic approach undertaken as part of this Action Plan will have a positive ripple impact on all other protected groups.

Additionally, the Race Equality Action Plan makes a specific recommendation around increasing the number of young people from a Black, Asian and Multi-ethnic background. We are also exploring ways to best use the Apprenticeship Levy to support our staff gain a range of relevant qualification. Additionally, we have invested in the Kickstarter programme.

<b>Disability</b>	4.3% of Council staff declared a disability, compared with 15.8% of the Borough's working age population. A further 1.5% of staff preferred not to say but over 35% have made no entry.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**Impact**

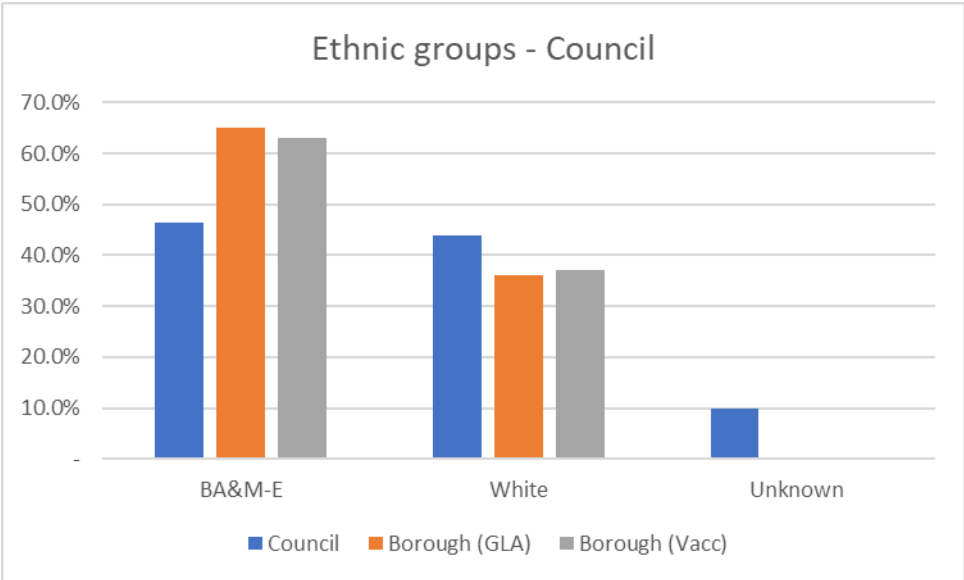
While the EIA process has not identified any negative impacts on groups with protected characteristics, it is important to note that the strategic approach undertaken as part of this Action Plan will have a positive ripple impact on all other protected groups.

**Gender reassignment**

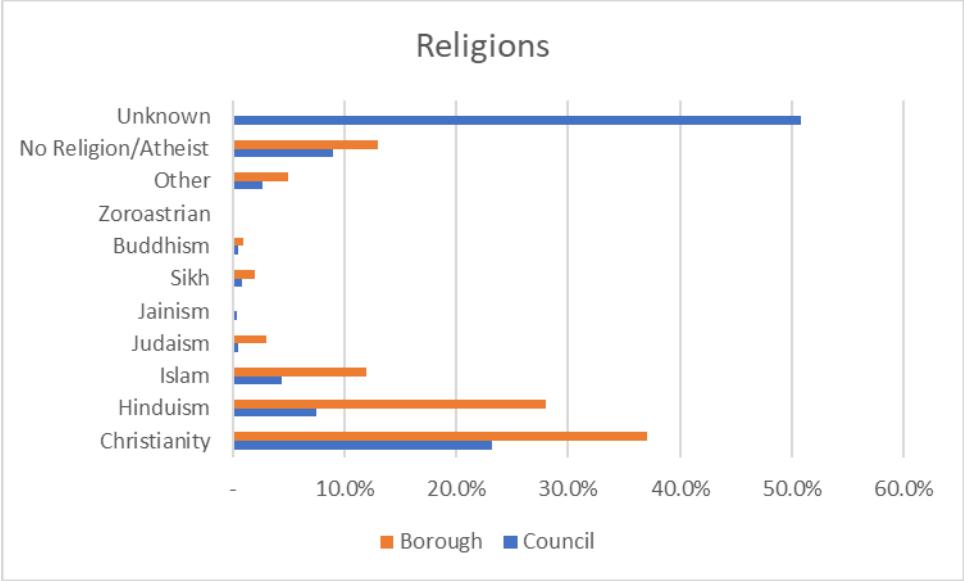
No data is currently available on gender reassignment.

**Impact**

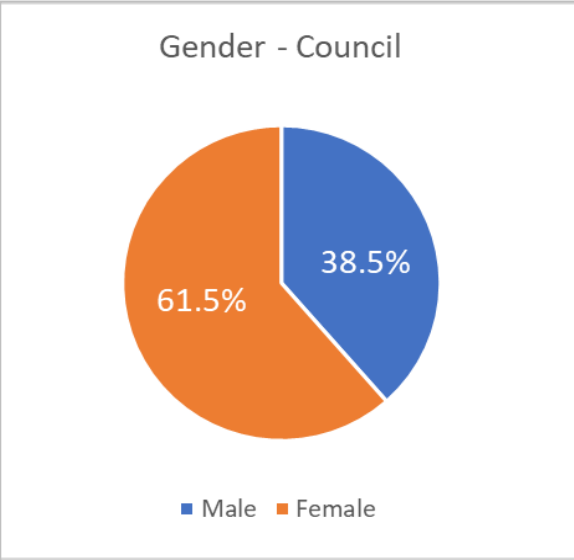
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<p><b>Marriage and Civil Partnership</b></p>	<p>Figures on marriage and civil partnerships is below:</p> <table border="1" data-bbox="456 416 808 730"> <thead> <tr> <th>Marital Status</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Marr.</td> <td>38.5%</td> </tr> <tr> <td>Single</td> <td>34.3%</td> </tr> <tr> <td>Sep.</td> <td>1.0%</td> </tr> <tr> <td>CivPar</td> <td>1.0%</td> </tr> <tr> <td>Div.</td> <td>2.7%</td> </tr> <tr> <td>Wid.</td> <td>0.6%</td> </tr> <tr> <td>Unknwn</td> <td>21.9%</td> </tr> <tr> <td><b>Grand Total</b></td> <td><b>100.0%</b></td> </tr> </tbody> </table> <p><b><u>Impact</u></b></p> <p>While the EIA process has not identified any negative impacts on groups with protected characteristics, it is anticipated that the strategic approach undertaken as part of this Action Plan will have a positive ripple impact on all other protected groups.</p>	Marital Status	%	Marr.	38.5%	Single	34.3%	Sep.	1.0%	CivPar	1.0%	Div.	2.7%	Wid.	0.6%	Unknwn	21.9%	<b>Grand Total</b>	<b>100.0%</b>	☒	☐	☐	☐
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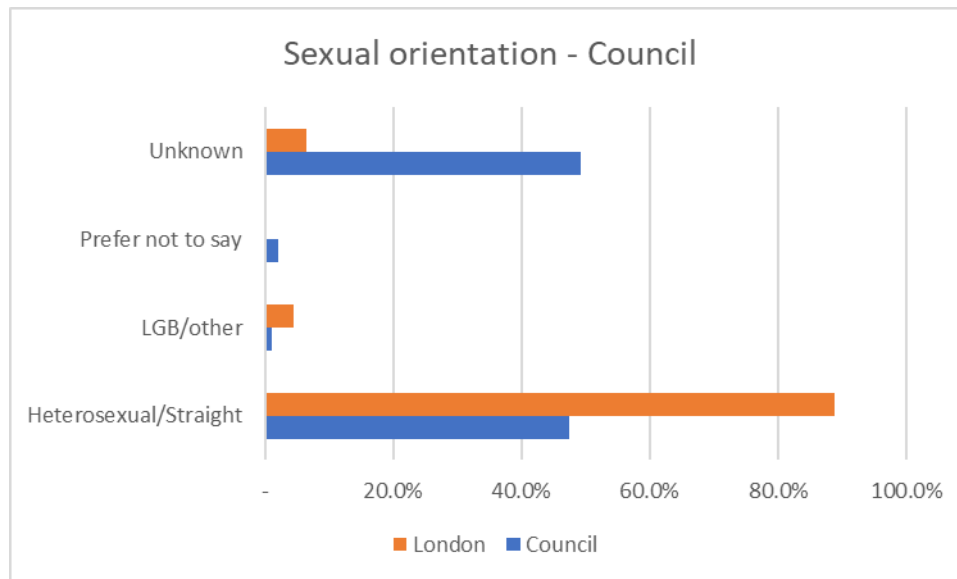
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<p><b>Race/ Ethnicity</b></p>	<p>Black, Asian and Multi-Ethnic people are under-represented in the workforce, compared with the Borough population, and the reverse is true of White people. Just under 10% of staff do not have ethnicity recorded but this does not account for the difference. At a more detailed level, proportions of both White and Black ethnic groups in the workforce exceed those in the Borough population. Other groups are under-represented, notable Asian at around 20 percentage points below.</p>  <p><b>Impact</b></p> <p>The Race Equality Action Plan will have a positive impact on race and ethnicity.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



<p><b>Religion or belief</b></p>	<p>The religion or belief system of over 50% of staff is not recorded. All major religions are represented in the Council but conclusions about proportions are difficult with this level of missing data</p>  <p>1</p> <p><b>Impact</b> While the EIA process has not identified any negative impacts on groups with protected characteristics, it is anticipated that the strategic approach undertaken as part of this Action Plan will have a positive ripple impact on all other protected groups.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Sex</b></p>	<p>The majority of Council staff are female. This gender structure is reflected in the Directorates with the exception of Community.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<sup>1</sup> Annual Population Survey (ONS) mid-year estimates 2019

	<p style="text-align: center;">Gender - Council</p>  <p style="text-align: center;">■ Male ■ Female</p> <p><b>Impact</b></p> <p>While the EIA process has not identified any negative impacts on groups with protected characteristics, it is anticipated that the strategic approach undertaken as part of this Action Plan will have a positive ripple impact on all other protected groups.</p>				
<p><b>Sexual Orientation</b></p>	<p>Just under 50% of staff did not record their sexual orientation. This is additional to the 2.2% who selected "Prefer not to say". 47.5% of staff selected Heterosexual/ Straight and 1.1% Lesbian, Gay or Other.</p>	☒	☐	☐	☐



**Impact**

While the EIA process has not identified any negative impacts on groups with protected characteristics, it is anticipated that the strategic approach undertaken as part of this Action Plan will have a positive ripple impact on all other protected groups.

**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

In light of the tragic murder of George Floyd, the Black Lives Matter protests, and the disproportionate impact of Covid-19 on people from a Black, Asian and Multi-ethnic backgrounds, we recognised that the council could do more to enhance the experiences and outcomes for our staff. According to our most recent ethnicity pay gap data, the council's Black, Asian and Multi-ethnic staff do not fairly represent Harrow's resident population. Although Harrow Council is a diverse employer, the lack of leadership diversity within some parts of the organisation is visible, with a lack of representation in leadership, management and senior tiers within the organisation, and a bottle neck between junior and managerial grades with Black, Asian, and Multi-ethnic staff generally concentrated in lower grades.

In terms of staff experiences of race, the Independent Race Review led by Dr Patrick Vernon and the Race Survey undertaken by FW Business, showed that 74% of staff had either experienced or witnessed racism in some form. 64% of staff could not definitively say that the council was not structurally racist, compared to 59% of staff who could not definitively say that the council was not institutionally racist. One of the key findings of the Review was the psychological trauma felt by staff affected by bullying and harassment. Crucially, in terms of training and development, 56% of staff were keen to gain relevant experience, 51% wanted access to opportunities, and 44% welcomed the idea of having a training needs analysis and action plan.

The council has therefore made a decision to begin work on equality, diversity and inclusion by focussing on race and ethnicity in the first instance. Although the report sets out the council's strategic vision around race equality, and launches a series of new corporate objectives for the organisation for Black, Asian and Multi-ethnic staff, this report will form the framework that underpins our strategic work on equality, diversity, and inclusion, to ensure the council's policies and practices are fair and equitable for all staff in order to promote a workforce that is inclusive and accessible for everyone.

**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

There is no other impact.

### 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

**Include details in the space below**

1. The Race Equality in Harrow Council report and Race Equality Action Plan will not result in any direct or indirect discrimination of any group that shares the protected characteristics.
2. The Race Equality in Harrow Council report and Race Equality Action Plan will help to advance the equality of opportunity for groups who share relevant protected characteristics and those who do not by addressing inequalities around access to employment and skills, rates of pay and business opportunities.
3. The Race Equality in Harrow Council report and Race Equality Action Plan will help foster good relations between communities through the creation of a good economy, which whilst providing economic growth, is built on the foundations of inclusivity and strong, cohesive communities.

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

**Outcome 1** No change required: the EIA 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 EIA 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