



### 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 (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 (EqIA)

<b>Type of Decision:</b>	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
<b>Title of Proposal</b>	Harrow Community Infrastructure Levy (HCIL) – approval of Discretionary Social Housing Relief policy / statement	<b>Date EqIA created:</b> September 2021
<b>Name and job title of completing/lead Officer</b>	David Hughes, Planning Policy Manager	
<b>Directorate/ Service responsible</b>		
<b>Organisational approval</b>		
<b>EqIA approved by Equality, Diversity and Inclusion Team</b>	<b>Name</b> Shumaila Dar, Head of Equality, Diversity and Inclusion	<b>Signature</b> <input checked="" type="checkbox"/> <b>Tick this box to indicate that you have approved this EqIA</b>  <b>Date of approval</b> 07/10/21

## 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?

Adoption of a Statement of Availability on Discretionary Social Housing Relief under Regulations 49A and 49B of the Community Infrastructure Levy Regulations 2010 (as amended). The proposed statement allows the Council, at its discretion, to offer Community Infrastructure Levy (CIL) relief for discounted market sale (DMS) units, an intermediate affordable housing tenure. This refers to housing units being sold at 80% or less of their market value. The ability to offer this discretionary relief was introduced under the February 2014 amendments to the CIL Regulations. To be able to offer the relief, a charging authority needs to publish a statement about how discounted market housing will be 'allocated' in its area, to the extent that the authority is responsible for 'allocating' that housing type. The meaning of 'allocation' in this context is not entirely clear in the CIL Regulations. It is considered that it should be interpreted as meaning that the charging authority should set out its approach to how discounted market units should be brought forward for sale (for example, to people who meet certain income criteria).

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

The provision of affordable housing generally has either a positive or indeterminate impact upon groups with protected characteristics. The proposal facilitates an alternative form of affordable housing (discount market sale units sold at 80% of market value or less) and is therefore also positive. Potentially in facilitating this particular form of affordable housing (an intermediate tenure), this could impact negatively upon low-cost rent tenures but overarching Local Plan policy would continue to prioritise such tenures.

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

There are no anticipated adverse influences under any protected characteristic.

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 <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			
Protected characteristic	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	Negative impact		No impact
			Minor	Major	
Age	<p>Harrow's resident population at 30 June 2018 was estimated to be just over 250,000. Growth over the last decade is 9%, lower than London's growth of 14% and higher than England's growth of 8%. At the 2011 Census Harrow had the second largest household size of England's 360 local authorities at 2.78 persons per household The total number of households (with at least one person) was 84,300.</p> <p>2018 ONS Mid-Year Population Estimates indicated that 21% of residents were children (aged 0-15), 63.3% were of working age (16-64) and 15.7% were aged 65 and above. The number and proportion of older people in Harrow continue to increase, with implications for housing and adult social care.</p> <p>The Harrow Strategic Housing Market Assessment (SHMA 2018) stated that the population and household growth projections for Harrow indicate that there are three main sources of household growth in the area:</p> <ul style="list-style-type: none"> <li>The impact of an ageing population will see more older single persons and couples. The majority of these households are already occupying dwellings in Harrow and the majority will not wish to downsize from the family size homes they currently occupy;</li> <li>The largest growth in projected households is for couples without dependent children, with the main growth being in households aged 55+, again the majority will not wish to downsize from the family size homes they currently occupy; and</li> </ul>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<ul style="list-style-type: none"> <li>Other households include multi-generation households and also those who occupy Houses in Multiple Occupation. These households would typically require at least 3 bedrooms in their property.</li> </ul> <p>The Harrow Local Plan (adopted 2012 and 2013) and Housing Strategy (adopted 2018) policies and priorities relating to increasing the supply of affordable housing, improving standards in the private sector and meeting the needs of vulnerable people have a positive impact on all age groups (as evidenced in the EqlA for the Housing Strategy).</p> <p>The proposal facilitates another form of affordable housing tenure thereby creating further avenues for home ownership across all age groups, resulting in a positive impact. This impact is likely to be most positive for younger persons who can afford to rent in the private market but cannot afford to purchase a property at 100% market value. Such facilitation (which is discretionary) could however be at the expense of low-cost rent tenures (such as London Affordable Rent) which are the priority in Harrow (reflected in the Local Plan and also the Harrow Housing Strategy). This impact is however expected to be minor as the overarching policy / priority remains low-cost rent tenures and the policy will be largely superceded by development of First Homes tenures (30% discount rather than 20% discount), which will benefit from mandatory social housing relief under the CIL Regulations. The overall impact will therefore remain positive.</p>				
<b>Disability</b>	<p>In the ONS Annual Population Survey 2017 13.7% of Harrow's working age population classified themselves as disabled, a total of 22,100 people. 6,470 individuals, 2.6% of the total population, received Disability Living Allowance.</p> <p>The Harrow SHMA 2018 found that the number of households on the local authority housing register at 1 April 2016 who needed to move on medical and welfare grounds (including grounds relating to a disability) was 196.</p> <p>The Harrow Local Plan (adopted 2012 and 2013) and Housing Strategy (adopted 2018) policies and priorities relating to increasing the supply of affordable housing, improving standards in the private sector and meeting the needs of vulnerable people will have a positive impact on people with disabilities (as evidenced in the EqlA for the Housing Strategy).</p> <p>The proposal facilitates another form of affordable housing tenure thereby creating further avenues for home ownership is likely to benefit people with disabilities, resulting in a positive impact. Such facilitation (which is discretionary) could however be at the</p>	☒	☐	☐	☐

	expense of low-cost rent tenures (such as London Affordable Rent) which are the priority in Harrow (reflected in the Local Plan and also the Harrow Housing Strategy) and for which there is an identifiable demand for from people with disabilities (reflected in Government policies such as only being able to stipulate the highest Part M Building Regulations requirements for that tenure, and the Harrow SHMA figures above). This impact is however expected to be minor as the overarching policy / priority remains low-cost rent tenures and the policy will be largely superseded by development of First Homes tenures (30% discount rather than 20% discount), which will benefit from mandatory social housing relief under the CIL Regulations. The overall impact will therefore remain positive				
<b>Gender reassignment</b>	There is limited data held about this protected characteristic for the Harrow population. 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. Although Gender Reassignment is a protected characteristic under equalities legislation, there is insufficient data and no evidence that the proposal will have a negative impact on any individual or group due to gender reassignment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Marriage and Civil Partnership</b>	The 2011 Census showed that 54% of Harrow's residents are married, which was the highest level in London. 21% of households were married, or in same sex civil partnerships, with dependent children, the highest level in London.  At 31 December 2016 there had been 142 Civil Partnerships in Harrow, 19 of which had been converted to marriage. There had been 32 same sex marriages in Harrow since inception on 29th March 2014.  There is no evidence that the proposal will have a negative impact on any individual or group due to marriage or civil partnership.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<b>Pregnancy and Maternity</b>	There is limited data held about this protected characteristic for the Harrow population. ONS births figures show Harrow as having 3,582 live births in 2018.  In 2016 there were 14.5 live births per 1000 population which is higher than the UK average of 11.8. For women under the age of 18, the birth rate was 3.7 per 1000 population which is in line with the London average of 3.8 and lower than the UK average of 5.7. Harrow has the lowest levels of live births outside of marriage in the country (19.4%).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	There is no evidence that the proposal will have a negative impact on pregnancy and maternity.				
<b>Race/ Ethnicity</b>	<p>Harrow's population is one of the most diverse nationally. The 2011 Census showed that 69.1% of residents were from Black, Asian and Multi-ethnic groups and 31.9% of residents stated that they were White-British. 26.4% of Harrow's residents were of Indian origin, the largest ethnic group. Harrow is also home to the country's largest Sri Lankan born community.</p> <p>The Harrow Local Plan (adopted 2012 and 2013) and Housing Strategy (adopted 2018) policies and priorities relating to increasing the supply of affordable housing, improving standards in the private sector and meeting the needs of vulnerable people have a positive impact on all race / ethnicity groups (as evidenced in the EqIA for the Housing Strategy).</p> <p>The proposal facilitates another form of affordable housing tenure thereby creating further avenues for home ownership across all race / ethnicity groups, resulting in a positive impact. Such facilitation (which is discretionary) could however be at the expense of low-cost rent tenures (such as London Affordable Rent) which are the priority in Harrow (reflected in the Local Plan and the Harrow Housing Strategy). This impact is however expected to be minor as the overarching policy / priority remains low-cost rent tenures and the policy will be largely superseded by development of First Homes tenures (30% discount rather than 20% discount), which will benefit from mandatory social housing relief under the CIL Regulations. The overall impact will therefore remain positive.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Religion or belief</b>	<p>Religious diversity is strong in Harrow. At the 2011 Census Harrow was the most religiously diverse borough in the country. The 2011 Census showed that Harrow has the highest number (and proportion) of Hindu followers in the country (25.3%), the highest number of Jains (2.2%) and the second highest number of Zoroastrians. Harrow's Jewish community was the sixth largest nationally. 37.3% of residents were Christians (the 5th lowest proportion in the country) and 12.5% were Muslims. Harrow had the 2nd lowest ranking for 'no religion'.</p> <p>The Harrow Local Plan (adopted 2012 and 2013) and Housing Strategy (adopted 2018) policies and priorities relating to increasing the supply of affordable housing, improving standards in the private sector and meeting the needs of vulnerable people have a</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p>positive impact on all religion of belief groups (as evidenced in the EqIA for the Housing Strategy).</p> <p>The proposal facilitates another form of affordable housing tenure thereby creating further avenues for home ownership across all religious and belief groups, resulting in a positive impact. Such facilitation (which is discretionary) could however be at the expense of low-cost rent tenures (such as London Affordable Rent) which are the priority in Harrow (reflected in the Local Plan and the Harrow Housing Strategy). This impact is however expected to be minor as the overarching policy / priority remains low-cost rent tenures and the policy will be largely superseded by development of First Homes tenures (30% discount rather than 20% discount), which will benefit from mandatory social housing relief under the CIL Regulations. The overall impact will therefore remain positive.</p>				
<p><b>Sex</b></p>	<p>The 2011 Census showed that in Harrow 49.4 per cent of residents were males and 50.6 per cent were females. Overall, the number of males and females living in Harrow is now very similar.</p> <p>The Harrow Local Plan (adopted 2012 and 2013) and Housing Strategy (adopted 2018) policies and priorities relating to increasing the supply of affordable housing, improving standards in the private sector and meeting the needs of vulnerable people have a positive impact on males and females (as evidenced in the EqIA for the Housing Strategy).</p> <p>The proposal facilitates another form of affordable housing tenure thereby creating further avenues for home ownership for both females and males, resulting in a positive impact. Such facilitation (which is discretionary) could however be at the expense of low-cost rent tenures (such as London Affordable Rent) which are the priority in Harrow (reflected in the Local Plan and the Harrow Housing Strategy). This impact is however expected to be minor as the overarching policy / priority remains low-cost rent tenures and the policy will be largely superseded by development of First Homes tenures (30% discount rather than 20% discount), which will benefit from mandatory social housing relief under the CIL Regulations. The overall impact will therefore remain positive.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>Sexual Orientation</b></p>	<p>There is limited data held about this protected characteristic for the Harrow population. It is estimated that around 10% of the UK population are lesbian, gay or bisexual, which would equate to approximately 25,000 of our residents. Although Sexual Orientation is a protected characteristic under equalities legislation there is insufficient data and no</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	evidence that the proposal will have a negative impact on any individual or group due to their sexual orientation.				
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**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

**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

<b>4. Public Sector Equality Duty</b> How does your proposal meet the Public Sector Equality Duty (PSED) to: <ol style="list-style-type: none"> <li>1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010</li> <li>2. Advance equality of opportunity between people from different groups</li> <li>3. Foster good relations between people from different groups</li> </ol>				
<b>Include details in the space below</b>				

<b>5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies</b>				
<input checked="" type="checkbox"/> <b>Outcome 1</b> <b>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</b>				
<input type="checkbox"/> <b>Outcome 2</b> <b>Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&amp;4</b>				
<input type="checkbox"/> <b>Outcome 3</b> <b>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.</b>				
Include details here				

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