



### 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>	Future High Streets Fund (FHSF) Projects: Public Realm, Meanwhile Use and Kiosks	<b>Date EqIA created 28/03/23</b>
<b>Name and job title of completing/lead Officer</b>	Mavis Kusitor, Economic Strategy Programme Manager	
<b>Directorate/ Service responsible</b>	Place Directorate, Inclusive Economy	
<b>Organisational approval</b>		
<b>EqIA approved by</b>	<b>Name: Yasmeen Hussein, EDI Policy Officer</b>	<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> <b>31/03/23</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?

In December 2020, Harrow Council successfully secured £7.4m in funding from the Government's Future High Streets Fund (FHSF) to deliver a project focussed on improving connectivity, inclusivity, and economic growth in Wealdstone Town Centre. This primarily focussed on the construction of a pedestrian bridge across the railway line that links the new housing on the "Kodak" development with Wealdstone town centre.

As there were deliverability issues with the implementation of the pedestrian bridge, Cabinet agreed in January 2023 to end the delivery of the project and to submit a Project Adjustment to the Grant Agreement to the Department for Levelling Up, Housing and Communities (DLUHC) to use the funding to deliver a range of improvements in Harrow Town Centre as follows:

Project Name	Project Description
Public Realm	Investment in the public realm on College Road, Clarendon Road, Pinner Road, St Ann's Road. This will improve connectivity between Harrow on the Hill Station and the town centre, and between the adjacent residential areas and the town centre.
Meanwhile Use	<p>Development of affordable commercial workspace on Greenhill Way Car Park to change the perception of the area prior to a site being developed, to attract people and increase footfall in the area, following the closure of Debenhams.</p> <p>Harrow Council will enable the project by providing part of the car park as the project site, funding the procurement of the team and operator for the design and business case, together with the capital funding for the construction of the approved design proposal.</p> <p>The finished development will then be leased to the successful operator with a signed agreement, and it will be the operator's responsibility to manage the operation of the site for the next 5 years.</p>

Kiosks	Replacement of existing kiosks with new kiosks, which will have access to power and water, and be more secure. The design will be undertaken in house in consultation with existing tenants.
<p><b>b) Summarise the impact of your proposal on groups with protected characteristics</b></p> <p><b>Public Realm, Meanwhile Use and Kiosks</b></p> <ol style="list-style-type: none"> <li>1. We do not anticipate that these projects will have a negative impact on Harrow residents or result in any direct or indirect discrimination of any group that shares protected characteristics.</li> <li>2. Outcomes include physical improvements to public realm to make the town centre more accessible, including better paving, wayfinding, and CCTV.</li> <li>3. Where appropriate, the public realm improvements and Meanwhile Use will support the access needs of disabled people such as wheelchair users and those with visual impairment e.g., step free access and tactile crossings.</li> </ol>	
<p><b>b) Summarise any potential negative impact(s) identified and mitigating actions</b></p> <p>We do not anticipate that these projects will have a negative impact on Harrow residents or result in any direct or indirect discrimination of any group that shares protected characteristics.</p>	

2. Assessing impact																						
Protected characteristic		Negative impact																				
Age		Positive impact	Minor	Major	No impact																	
<p>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.</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>																					
<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>	<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>																					
<p><b>Age</b></p>	<p>Harrow has a resident population of 261,300<sup>1</sup>. Increasing by 9.3% in the ten years between 2011 and 2021 with an increase of 7.8% in people aged 15 to 64 years, it has an above average working age population aged 16-64 of just under 65% (169k) and a growing younger population aged 0-15 of 18.5% (48k), which is higher than the London average, suggesting that the borough is a popular destination for families<sup>2</sup>.</p> <div style="text-align: center;"> <table border="1" style="margin: 0 auto;"> <caption>Population by Age band % (Harrow 2021 Census)</caption> <thead> <tr> <th>Age Band</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>0-15</td> <td>20%</td> </tr> <tr> <td>16-24</td> <td>10%</td> </tr> <tr> <td>25-49</td> <td>37%</td> </tr> <tr> <td>50-64</td> <td>18%</td> </tr> <tr> <td>65-84</td> <td>13%</td> </tr> <tr> <td>85+</td> <td>2%</td> </tr> </tbody> </table> </div>				Age Band	Percentage	0-15	20%	16-24	10%	25-49	37%	50-64	18%	65-84	13%	85+	2%	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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85+	2%																					

<sup>1</sup> Census 2021

<sup>2</sup> Census 2021

	<ul style="list-style-type: none"> <li>As with most areas in the country, the borough has an ageing population. With the number of residents aged 65 plus increasing by 19.4% in the ten years between 2011 and 2021 with 31% rise in people aged 90 years and over<sup>3</sup>. Those aged 85 plus could increase by 60% by 2030<sup>4</sup>.</li> <li>Data available shows that the pandemic has adversely impacted young people aged 18-24, with 1 in 10 young people out of work<sup>5</sup>.</li> <li>Harrow has one of the lowest proportions of young people Not in Education, Employment and Training (NEETS). However, due to the Covid-19 pandemic, there has been a significant increase in numbers, from 0.8% to 1.8%<sup>6</sup>. (Now 1.2% August 2022<sup>7</sup>)</li> </ul> <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>The projects will aim to be inclusive of all residents regardless of their age.</li> <li>The Meanwhile Use and Kiosks will have diversity amongst the businesses and traders that will occupy the space.</li> </ul>				
<b>Disability</b>	<ul style="list-style-type: none"> <li>The 2021 Census data shows that 9.75% of Harrow's population aged 15 to 64 years have a disability this equates to 16,840 people.</li> </ul> <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>The projects will aim to be inclusive of all residents regardless of their disability status.</li> <li>Where appropriate, the public realm improvements and Meanwhile Use projects will support the access needs of disabled people such as wheelchair users and those with visual impairment e.g., step free access and tactile crossings.</li> <li>The Meanwhile Use and Kiosks will have diversity amongst the businesses and traders that will occupy the space.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>3</sup> Census 2021

<sup>4</sup> Poppi and Pansi projections to 2030

<sup>5</sup> DWP Job claimant data April 2021

<sup>6</sup> NEETS data at December 2020.

<sup>7</sup> NEETS data at December 2022.

<p><b>Gender reassignment</b></p>	<ul style="list-style-type: none"> <li>In 2020, the Equality and Human Rights Commission (EHRC) survey found that one in six respondents identified themselves as prejudiced towards transgender people<sup>8</sup>.</li> </ul> <p>The 2021 Census data shows the following:</p> <ul style="list-style-type: none"> <li>90.12% of Harrow residents described themselves as having the same gender identity as sex registered at birth (188,901 respondents)</li> <li>0.53% of Harrow residents described themselves as having a gender identity which differs to the sex registered at birth, but gave no specific identity (1,108 respondents)</li> <li>0.15% of Harrow residents described themselves as a Trans woman (318 respondents)</li> <li>0.16 of Harrow residents described themselves as a trans man (342 respondents)</li> <li>0.03% of Harrow residents described themselves as non-binary (57 respondents)</li> <li>0.03% of Harrow residents described themselves as 'All other gender identities' (59 respondents)</li> </ul> <p>8.98% of Harrow residents did not respond (18,832 respondents)</p> <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>The projects will aim to be inclusive of all residents regardless of their gender reassignment status.</li> <li>The Meanwhile Use and Kiosks will have diversity amongst the businesses and traders that will occupy the space.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p><b>Marriage and Civil Partnership</b></p>	<ul style="list-style-type: none"> <li>At the time of the 2021 Census 53.9% of Harrow's residents were married or in a registered civil partnership, which was the highest level in London.</li> <li>21% of households were married, or in same-sex civil partnerships, with dependent children, the highest level in London.</li> <li>At October 2020 there have been 144 Same Gender Civil Partnerships in Harrow, 25 of which has been converted to a Marriage. There have been 8 Opposite Gender Civil Partnerships. There have been 57 Same Sex marriages.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>8</sup> Equality and Human Rights Commission (2020), Attitudes transgender people, 2020

	<p><b>Impact</b> The projects will aim to be inclusive of all residents regardless of their marriage and partnership status. The Meanwhile Use and Kiosks will have diversity amongst the businesses and traders that will occupy the space.</p>				
<p><b>Pregnancy and Maternity</b></p>	<ul style="list-style-type: none"> <li>• ONS births figures show Harrow as having 3,312 live births in 2021<sup>9</sup>. 14 live births per 1000 population is higher than the England &amp; Wales average of 10.8</li> <li>• The borough has a higher-than-average infant mortality rate in London, at a rate of 3.9 deaths per 1000 live births, which is an indicator of poverty and inequality in the borough.<sup>10</sup></li> <li>• Nationally, women have faced discrimination during pregnancy and maternity in the workplace. EHRC Survey data shows that around one in nine mothers (11%) reported that they were either dismissed; made compulsorily redundant, where others in their workplace were not.</li> </ul> <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>• The projects will aim to be inclusive of all residents regardless of their pregnancy and maternity status, including residents with childcare/caring responsibilities.</li> <li>• The Meanwhile Use and Kiosks will have diversity amongst the businesses and traders that will occupy the space.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

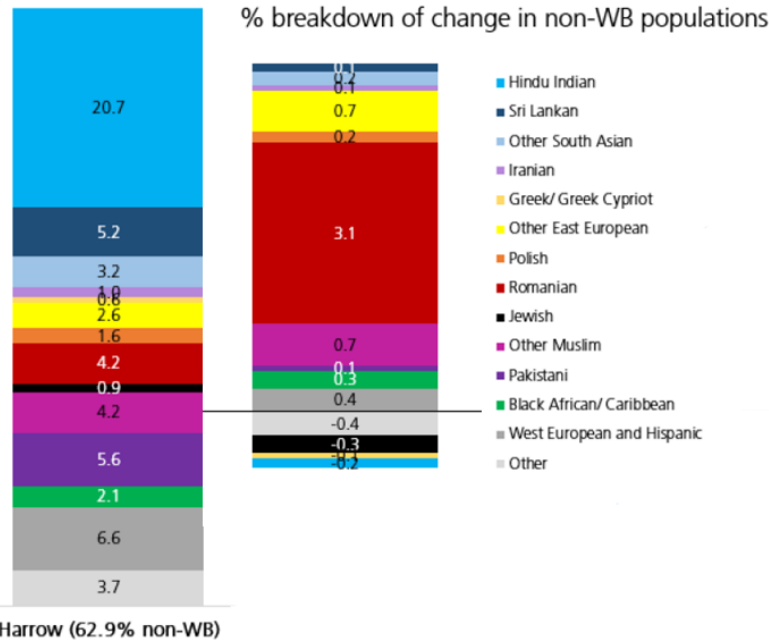
<sup>9</sup> Source: Office for National Statistics (ONS, 2022), Live births in England and Wales 2021

<sup>10</sup> Public Health England (2022), London's Poverty Profile 2022,



Race/  
Ethnicity

% breakdown of non-WB populations, 2019



- Harrow is one of the most culturally diverse local authorities in the UK, with over 60% of residents from Black, Asian, and Multi-Ethnic backgrounds and an estimated 20% Eastern European community, which is fast growing<sup>11</sup>. Black African (notably the Somali Community) groups have been fast growing over the last 6 years or so, as has the Afghan community.
- Unemployment rates are significantly higher in certain areas of the borough, particularly in the Wealdstone and Marlborough wards (central Harrow) and Roxbourne (south Harrow), focused in an around the Rayners Lane estate and among residents classified as Black and Other ethnic groups. These areas are also ranked high on the indices of deprivation for the UK.

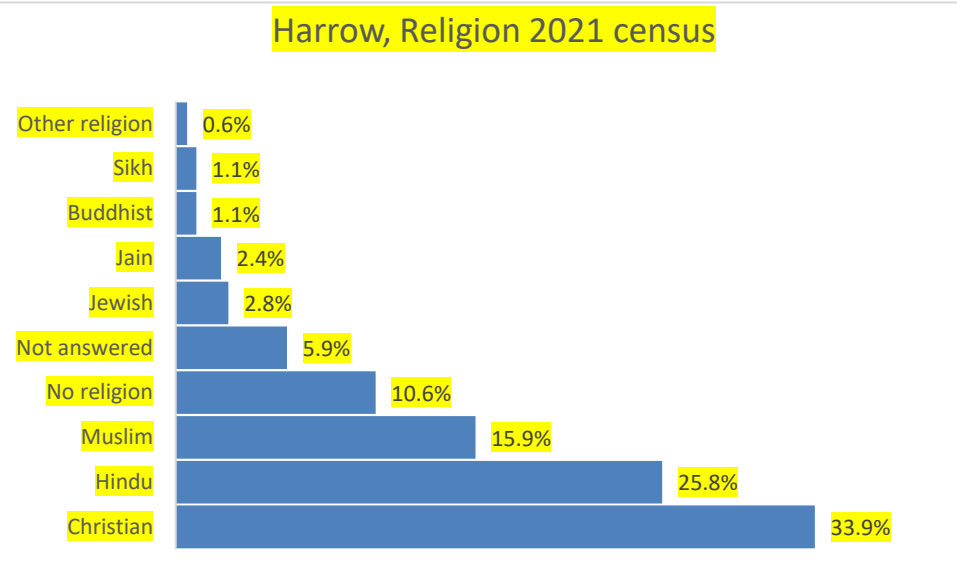
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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<sup>11</sup> Harrow Economic assessment 2019-2020: population

	<ul style="list-style-type: none"> <li>The majority of 16–18-year-olds that are classed as NEET are from Black, Asian, and Multi-Ethnic backgrounds and located in wards with high levels of deprivation. However, the data also shows that the single largest ethnic group of pupils aged 16-18 classed as NEET is White British.</li> <li>At ward level Marlborough, and Wealdstone have the highest number of households in need of re-housing. These respectively have a Black, Asian, and Multi-Ethnic population of 77% and 75%.</li> <li>Black, Asian, and Multi-Ethnic residents are more likely to experience barriers to employment due to lack of English language, functional and digital skills.</li> <li>Over 94% of Harrow businesses are classed as micro-businesses. There is limited data on the profile of business ownership by protected characteristics. Anecdotal evidence suggests that most retail businesses in Harrow’s town centres are Black, Asian, and Multi-Ethnic - owned.</li> </ul> <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>The projects will aim to be inclusive of all residents regardless of their race and ethnicity.</li> <li>The Meanwhile Use and Kiosks will have diversity amongst the businesses and traders that will occupy the space.</li> </ul>				
<p><b>Religion or belief</b></p>	<ul style="list-style-type: none"> <li>Religious diversity is strong in Harrow. At the 2011 Census Harrow was the most religiously diverse borough in the country with the highest number Hindus (25%) and Jains (2.2%) and the second highest number of Zoroastrians.</li> <li>At the 2021 census Harrow had the highest number (and proportion) of Hindu followers in the country (25.8%). At 2.8% Harrow 's Jewish community was the ninth largest nationally. 33.9% of residents described themselves as Christians (the 11th lowest proportion in the country) and 15.9% described themselves as Muslims. Harrow had the lowest ranking for ‘no religion’ (10.9%).</li> <li>As the population’s ethnic composition changes, rates of participation in various religions are also likely to change<sup>12</sup>.</li> <li>There is limited data on employment/unemployment rates for Harrow by religion.</li> <li>Data for London suggests that educational attainment and employment among the capital’s Muslim community is lower than those from other faith groups located in the borough<sup>13</sup>.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>12</sup> Harrow Economic Assessment: 2019-2020: population

<sup>13</sup> Annual Population Survey 2018.

	<p style="text-align: center;"><b>Harrow, Religion 2021 census</b></p>  <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>• The projects will aim to be inclusive of all residents regardless of their religion or beliefs.</li> <li>• The Meanwhile Use and Kiosks will have diversity amongst the businesses and traders that will occupy the space.</li> </ul>				
<p><b>Sex</b></p>	<ul style="list-style-type: none"> <li>• The 2021 Census show that the total population of Harrow is now 261,300, made up of 132,500 women (50.7%) and 128,800 men (49.3%). Overall, the number of males and females living in Harrow is very similar.</li> <li>• Economic activity among Harrow’s male population is higher than the London average at 89.2%, compared with 83.8%.</li> <li>• Economic activity among females in the borough is also higher than the London average at 75.4%, compared with 74.9%<sup>14</sup>.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>14</sup> Source: ONS annual population survey (September 2022)

	<ul style="list-style-type: none"> <li>Harrow is a low wage borough, with all those that are employed in the borough earning gross weekly earnings of £514.20, which is 37% less than the London average of £815.90. Women in the borough have gross weekly earnings of £485.90 and men in the borough earn £615.00. The London average earnings for women is £669.20 and for men it is £935<sup>15</sup>.</li> <li>20% of Harrow businesses are female led.<sup>16</sup> cm</li> <li>While the pandemic may have negatively impacted both sexes, the shift to home working may have had a positive impact in enabling women to return to work, as they are able to share childcare responsibilities.</li> </ul> <p><b>Impact</b> The projects will aim to be inclusive of all residents regardless of their sex. The Meanwhile Use and Kiosks will have diversity amongst the businesses and traders that will occupy the space.</p>				
<p><b>Sexual Orientation</b></p>	<p>The 2021 Census shows that 4.27 % of Londoners identify as LGBTQIA+, the highest of any UK region<sup>17</sup>. 1.65% of Harrow residents identify as LGBTQIA+, this is approx. 4k people<sup>18</sup>.</p> <p>LGBTQIA+ people are also likely to be underrepresented among business owners within Harrow. There is no official data on sexual orientation for Harrow in relation to employment.</p> <p><b>Impact</b></p> <ul style="list-style-type: none"> <li>The projects will aim to be inclusive of all residents regardless of their sexual orientation.</li> <li>The Meanwhile Use and Kiosks will have diversity amongst the businesses and traders that will occupy the space.</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<sup>15</sup> Source: ONS earnings by place of work: 2021

<sup>16</sup> Beauhurst: number of companies registered at Companies House that are female led (April 2021)

<sup>17</sup> Source: 2021 Census

<sup>18</sup> Source: 2021 Census

**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

- The uncertainty of the cost-of-living may harm the growth and survival of businesses in the town centre. This may also impact resident’s ability to spend time and money in the town centre.

**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	Deadline date	Lead Officer
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		are unable to identify measures to mitigate impact, please state below.		
<p><b>Cost-of-living may harm the growth and survival of businesses in the town centre.</b></p> <p><b>a) Sex:</b> 6% of women in Harrow aged 16 to 64 years are self-employed, this is less than the London average of 8.5%. Whereas 13.5% of men in Harrow aged 16 to 64 years are self-employed, this is close to the London average of 14%.</p> <p><b>b) Race / Ethnicity:</b> Harrow is one of the most culturally diverse local authorities in the UK, with over 60% of residents being Black, Asian, Multi-ethnic or Other ethnic group.</p> <p>Many residents operate micro businesses that are disproportionately impacted by the cost-of-living crisis as they lack the benefit of consumer</p>	<p>Although we cannot directly influence a business' decision to cease trading or to relocate away from the town centre, the Council works in close partnership with Harrow Town Centre BID (HA1 BID) to track business activity. HA1 BID deliver interventions, activities, and events to increase footfall into the area. There is a Business Forum that meets every four months to discuss key matters pertaining to businesses, members include the Federation of Small Businesses, North West London Chamber of Commerce, HA1 BID and business owners. The Economic Development team provide business engagement support and can signpost struggling businesses to available resources.</p> <p>The UK Shared Prosperity Fund programme in Harrow will provide</p>	<p>The Economic Development team carry out an annual survey on shop front vacancy rates in the town centre. This helps us to track businesses moving into or leaving the town centre.</p>	<p>Ongoing</p>	<p>Mavis Kusitor</p>

<p>protection schemes such as the energy price cap.</p> <p>Due to the cost of living, many businesses are finding it harder to stay open, especially those based on the high street which rely on passing trade.</p> <p><b>c) Disability:</b> There is a strong correlation between disability, in particular the extent of the disability and economic inactivity. There are also particular groups that have specific obstacles in progressing to the labour market or sustaining self-employment. These include adults with learning disabilities and those with severe mental health issues. Disabled people are also likely to be under-represented among business owners within Harrow.</p>	<p>targeted support for female, Black, Asian and Multi-ethnic and disabled business owners and residents that are interested in starting a business.</p>			
<p><b>Cost-of-living may impact resident's ability to spend time and money in the town centre.</b></p> <p><b>a) Pregnancy / Maternity:</b></p>	<p>The cost of living continues to affect households across the UK, the government has announced a new package of payments to help most households claiming benefits.</p>	<p>The cost of living is a national crisis. We will assess the trend using data provided by the UK government and other data agencies.</p>	<p>Ongoing</p>	<p>Mavis Kusitor</p>

<p>Single parents are among those most exposed to the cost-of-living crisis, particularly those aged 25 and under, who get a reduced rate of universal credit.</p> <p>The Council has pledged to reduce Council Tax bills for less well-off families and roll out full fibre broadband to Council housing.</p> <p><b>b) Sex</b> Harrow's economically active male population is 89.2%, compared with the female population at 75.4%.</p> <p>Harrow is a low wage borough, women in the borough have gross weekly earnings of £485.90 and men in the borough earn £615.00. The London average earnings for women is £669.20 and for men it is £935.10.</p> <p><b>c) Race / Ethnicity:</b> Black, Asian and Multi-ethnic residents are more likely to experience barriers to employment due to lack of English language, functional and digital skills.</p>	<p>Residents can contact the Council for guidance on the help that is available to them.</p>			
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<p><b>d) Disability:</b> Disabled individuals who have lower income than their non-disabled counterparts will be disproportionately impacted by the cost-of-living crisis.</p>				

#### 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 FHSF will not result in any direct or indirect discrimination of any group that shares protected characteristics.
2. The FHSF will help improve connectivity between Harrow on the Hill Station and the town centre, and between the adjacent residential areas and the town centre. The access needs of disabled people such as wheelchair users and those with visual impairments will be considered.

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

Outcome 1

**No change required: the EqlA 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 EqlA 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