

Equality Impact Assessment (EqIA) Form

In order to carry out this impact assessment, it is important that you have completed the EqIA E-learning Module and read the Corporate Guidelines on EqIA's. Please refer to these to assist you in completing this form and assessment.

SCREENING

What is the policy? (name and description)	Aids and Adaptations Policy
Which Directorate and Service is responsible for the policy?	Asset Management, Housing Services
Name & contact details of person(s) carrying out the EqIA:	Paul O'Callaghan – 020 8424 1717 (x2717)
Date of assessment:	9 th March 2011

Stage 1: About the Policy

1. Is this a new or an existing policy?	Policy refresh
2. What are the aims, objectives or purpose of the policy?	There have been numerous changes to the way that the aids and adaptations service is delivered and administered by local authorities. This policy aims to ensure that the service provided by Harrow Council is in line with these changes, and seeks to manage resident expectations better.
3. What factors / forces could prevent you from achieving these aims and objectives?	Cabinet non approval, poor internal relationships , lack of funding
4. How does the policy contribute to the council's corporate aims and objectives?	The policy will provide clarity on how the Council assesses applications for adaptations and the circumstances when discretionary assistance will be provided. By definition the policy will affect people with disabilities, but it is also likely to impact on older people more than other age groups, although adaptations will be provided based on need irrespective of the age of the disabled person. The principles of the policy confirm the council's commitment to improve people's lives by giving people more choice and control and to assist people to remain in their own home wherever practicable.

5. Who is intended to benefit from this policy and in what way?	Residents – improved satisfaction and value for money Harrow Council – efficiency savings		
6. Is responsibility for the policy shared with another department, authority or organisation? If so: • Who are the partners? • Who is responsible for the policy?	The responsibility for monitoring the policy will be with the Housing Department’s Asset Data & Planning Team as budget holders.). The responsibility for delivering the service described in the policy is with Property services HART team. This will continue to be reviewed in partnership with relevant stakeholders, internal departments and those organisations that provide the service in partnership with us.e.g Occupational Therapy service.		
Stage 2: Collecting Evidence			
7. What data or benchmarking information is available to facilitate the screening of this policy? • Results from the Place Survey • Customer Satisfaction Surveys • Local or national research • Complaints or compliments received • CAA, IIP or other assessments	Our performance figures for Aids and Adaptations are reported monthly to the Housing Direct Reports group. The quarterly figures are then reported to the Adults and Housing Improvement Board. More recently, there has been an Aids and Adaptations Executive Board established which will look at performance, and also monitor the effect of the policy throughout the cycle. In addition to this, customer satisfaction data is collected regularly on the performance of this service		
8. Have you undertaken any consultation on this policy? Yes			
If yes, who was consulted? Older People’s forum, Harrow Association for Disabled, Asset Management Improvement Group, Tenants and Leaseholders Consultative Forum and Harrow Federation of Tenants and Residents, Members Housing Policy group, Internal stakeholders. These groups were consulted initially and then consulted with again following the re-draft.			
Equality Strand	Name of Group	What consultation methods were used?	What do the results show about the impact on different equality groups?
Age	POP, HOPA, AMIG, MHPG, Internal Stakeholders	Policy was presented in draft format to these groups via presentation. The document was also circulated for comments.	All affected groups agreed with the content of the policy.
Disability	HAD, MHPG, Internal stakeholders	Policy was presented in draft format to these groups via presentation. The document was also circulated for comments.	All affected groups agreed with the content of the policy.

Gender			
Race			
Religion or Belief			
Sexual Orientation			
Other (please state)			

9. If you have not undertaken any consultation, explain why?

Proposed Consultation (for NEW policies)

NOTE: If you have not undertaken any consultation as yet, list your proposals for consultation with target dates in the section below. Any proposed consultation needs to be **completed before** progressing with the rest of the EqIA.

For guidance on consultation, see consultation guidelines on the HUB <http://harrowhub/site/scripts/documents.php?categoryID=127>

Who do you plan to consult?	What method of consultation do you propose to use and what is your target date for consultation?	What did the results show about the impact on different equality groups?

Stage 3: Assessing Impact

10. Considering the information / data from your research or/and consultation, is there any reason to believe that any adverse impact occurs or has the potential to occur on any equality group?

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
		X		X		X		X		X		X		X

If yes, explain what the impact is and which group(s) this affects?

If none, go to question 11.

10A. What measures are you going to take to eliminate or reduce the adverse impact(s)? E.g. consultation, research, implement equality monitoring

Equality Group	Actions identified to eliminate/reduce adverse impact (Copy these measures into the Improvement Action Plan)
Age	
Disability	
Gender	
Race	
Religion or Belief	
Sexual Orientation	
Socio Economic	

11. Is there any evidence or concern that **direct discrimination** may occur with reference to anti discrimination legislation?

***Direct discrimination** - occurs when a person is treated less favourably than others on the grounds of their age, disability, gender, race, religion or belief, or sexual orientation. Refer to main guidelines and toolkit for examples of direct discrimination.*

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
			X		X		X		X		X		X	

If yes, explain which equality group(s) this affects? **(You are encouraged to seek Legal Advice)**

12. Is there any evidence or concern that **indirect discrimination** may occur? If yes describe this below and whether you can credibly justify continuing with the policy in terms of the benefits of its wider aims?

***Indirect discrimination** - occurs when a rule, condition or requirement, which applies equally to everyone, has a disproportionately adverse effect on people from a particular equalities group when there is no objective justification for the rule. Refer to main guidelines and toolkit for examples of indirect discrimination.*

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
		X		X		X		X		X		X		X

If yes, explain which equality group(s) this affects? (You are encouraged to seek Legal Advice)

13. Is the policy likely to affect relations between certain groups, for example because it is seen as favouring a particular group or denying opportunities to another?

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
		X		X		X		X		X		X		X

If yes, explain which equality group(s) this affects?

14. If you have any further evidence or concern the potential impact the policy may have on a particular group(s), explain these below. This could be positive or negative. (if neither positive or negative, insert none)

Equality Group	Positive	Negative
Age		
Disability		
Gender		
Race		

Religion or Belief						
Sexual Orientation						
Socio Economic Inequality						
<p>15. How does the policy conform to the requirements of the Public Equality Duties, which require all council functions and services to:</p> <ul style="list-style-type: none"> • promote equality of opportunity, • eliminate discrimination • promote good relations between different equality groups <p>If the answer is none or N/A please state why? What amendments could be made?</p>	<p>As stated earlier in this assessment, assistance will be offered based on need as opposed to a first come, first served basis. Equalities data will be collected and monitored to ensure that this is the case throughout.</p> <p>The approach laid out in the policy ensures that, where possible, the council will seek to assist individuals to remain within their property – by doing so, this enhances community cohesion by ensuring that existing communities are allowed to remain in the area and develop. It also enhances equality of opportunity in groups that require adaptations to their home to be able to live there (typically those that are disabled or elderly); where previously individuals in this group may have been asked to relocate to find suitable properties, there is now the opportunity to remain in their home/community.</p> <p>The means testing used by the council is attached to the policy, along with other criteria laid out in statute</p>					
16. Has an impact been identified?	Yes		If yes, is the impact positive or negative?	Positive		Go to Q17
	No (go to Q17)	X		Negative		Go to Q16A
16A. If there is a negative impact on any group(s), is that impact legal?	Yes		If illegal, take legal advice	If legal, is the impact intended?	Yes	
	No				No	
17. Have you received any complaints or compliments about the policy? If so, provide details.	No					

18. What monitoring is in place to check the effects of the policy on equality groups?	Ongoing monitoring of customer satisfaction, complaints data and also regular reviews of performance to ensure that we are adhering to the details laid out within the policy.
19. How will the results of any monitoring be analysed, reported and publicised?	These will be fed back to the groups laid out in section 8 of this assessment, as well as being included in internal reporting procedures (improvement board, HGMT etc)
20. What monitoring measures need to be introduced to ensure effective monitoring of the policy? (Include in Improvement Action Plan)	Monitoring processes are already in place through established performance reporting frameworks, and multi-agency groups. These will continue to be in place throughout the life of the policy, and will be used as the primary method of monitoring and reviewing going forward.
21. When will the policy be reviewed?	Yearly, or when required due to external changes in policy

Decision

22. On the basis of your answers so far, what is the potential for differential impact? (see note 19.8 in Corporate Guidance Document)	High <i>(Large adverse impact on equality groups)</i>	Medium <i>(Some adverse impact on equality groups)</i>	Low <i>(Low potential for adverse impact on equality groups)</i>
			X
	Continue on to Part 2 for a full assessment.		Go to Stage 4 for any actions to improve policy and sign off.
Mark with an X			

FULL ASSESSMENT

23. Does the policy impact less favourably on a certain group or groups in comparison with others?														
Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No
If yes, explain how:														
24. Is there any evidence of higher or lower participation, uptake or exclusion by any of the following equality groups?														

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No

If yes, explain how:

25. Do any groups have lower than average success rates in particular processes and/or access to services?

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No

If yes, explain how:

26. Do criteria or requirements in relation to the policy disadvantage certain groups, either explicitly or inadvertently?

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No

If yes, explain how:

27. Is access to services and benefits reduced or denied for some groups in comparison with other groups?

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No

If yes, explain how:

28. Do particular groups face increased difficulty or indignity as a result of the policy?

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No

If yes, explain how:

29. Are there higher complaints rates or lower satisfaction rates for particular equality groups in connection with the policy, in comparison with other

groups?														
Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No

If yes, explain how:

30. Is there evidence that the policy fails to respond to the needs of a particular group, in comparison with other groups?

Mark answer with an X	Age		Disability		Gender		Race		Religion / Belief		Sexual Orientation		Socio Economic Inequality	
	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No	Yes	No

If yes, explain how:

Further Consultation

31. In the context of the previous questions, are there any groups you feel need to be consulted in order to reduce / eliminate adverse impact or identify potential barriers to improve access to the policy? (*Answer with an X*)

YES

NO
(Go to Q33)

NOTE: If you already have some ideas on how to mitigate a potentially adverse impact you should include this in your consultation. Consultees can therefore help not only to identify potentially adverse impacts but also to identify possible solutions.

Consultation can take on many different forms and the extent should be in proportion to the effect that the proposal is likely to have. Methods of consultation could include a survey, questionnaire, and focus group or open meetings. Take care not to restrict consultation only to recognised or 'official' associations and community leaders. It may be helpful to contact other officers who you know have carried out consultation exercises with these groups / individuals.

What consultation do you propose to undertake? Complete the section below and also include these in the Improvement Plan.

Equality Group	Type of consultation planned	Who with?	By when?
Age			
Disability			
Gender			

Race			
Religion or Belief			
Sexual Orientation			
Other			

Stage 4 Making Adjustments (Improvement Action Plan)

32. List below any recommendations for action that you plan to take as a result of this impact assessment. This will include any actions identified throughout the EqIA. *(Insert additional rows as required)*

Area of potential adverse impact e.g. Race, Disability	Action proposed	Lead Officer	Timescale	Resource implication	Comments
No adverse impact	We will continue to monitor all complaints and satisfaction data, as well as hold regular meetings to ensure that residents are receiving the same, if not improved, standards of service & vfm.	Kulwinder Singh-Rai – Asset Data & Planning Manager	3 years with delegated responsibility to chief officer and portfolio holder to approve minor alterations in line with good practise in the interim.	Officer time	None
No adverse impact	We will ensure that we maintain and improve the groups that were laid out in section 8, to include a greater representation of internal stakeholders to drive forward improvements and monitor service changes	Kulwinder Singh-Rai – Asset Data & Planning Manager	As above	Officer time	None
No adverse impact	We will ensure that we maintain strong links with representative groups where the policy has the greatest impact to inform them of changes	Kulwinder Singh-Rai – Asset Data & Planning Manager	As above	Officer time	None

Stage 5 – Reporting Results

We are required to ensure all completed EqIA's will be put onto the Council's website under the equality and diversity section and they will also be made available to members of the public on request.

33. Methods of publication – how will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc

This impact assessment will be made available through the normal channels (website/intranet), and also available upon request.

Stage 6 - Monitoring

It is important to monitor the actions arising from the impact assessment to ensure improvement to policy.

34. How will the actions be monitored to ensure improvement to the policy?

These will be outlined in further reports, and also Project Initiation Documents to ensure that there is a record of these actions and we can therefore be held to account. Reports will be taken to various groups, and minutes/notes taken to provide written documentation.

Stage 7 - Organisational sign Off (to be completed by Chair of Departmental Equalities Task Group)

The completed EqIA needs to be sent to the chair of your Departmental Equalities Task Group (DETG), who will discuss and agree the actions in the Improvement Plan.

Once agreed the actions from the Improvement Plan need to be included in Departmental Business Plans for implementation.

35. Which group or committee considered the action plan and agreed the actions to improve the policy? If you agreed no further action as a result of the EQIA, explain why?

Signed: (Lead officer completing EqIA)	Paul O'Callaghan	Signed: (Chair of DETG)	
Date:		Date:	