

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)	Grant allocations 2011/12: review of 2011/12 process
Which Directorate and Service is responsible for the policy?	Community and Environment, Community Development
Name & contact details of person(s) carrying out the EqIA:	Kashmir Takhar, 020 8420 9331
Date of assessment:	12 th May 2011

Stage 1: About the Policy

1. Is this a new or an existing policy?	New and existing – the 2011/12 grants programme has been conducted in accordance with the application and assessment process introduced in 2010/11. This EqIA assesses the potential impact of the Cabinet decision to use a scoring threshold to determine the awarding of grant funding in 2011/12.
2. What are the aims, objectives or purpose of the policy?	The aim of this policy is to award grant funding to voluntary and community sector organisations who have applied for funding for the financial year 2011/12, on the basis of scores achieved through the assessment process on a consistent and transparent basis that is neutral to whether or not applicants have received grants in former years' annual grants rounds.
3. What factors / forces could prevent	The delivery of this policy is subject to the appeals process which will be a final review prior to decision in

<p>you from achieving these aims and objectives?</p>	<p>accordance with our continuing duty to pay due regard to every stage of the process.</p>										
<p>4. How does the policy contribute to the council's corporate aims and objectives?</p>	<p>All grant applicants are asked to state which of the Council's corporate priorities their funding application relates to. Responses are used only to determine that the request for funding falls within an area the Council wishes to fund. This year's process demonstrates that most applicants support those most in need and it is inferred that most protected groups fall within this category. However, there are no set limits of how much can be awarded against each priority area. An analysis of applications for 2011/12 shows how applications relate to the four corporate priorities:</p> <table border="1" data-bbox="638 454 1774 646"> <thead> <tr> <th data-bbox="638 454 1556 518">Corporate priority</th> <th data-bbox="1556 454 1774 518">Number of applications</th> </tr> </thead> <tbody> <tr> <td data-bbox="638 518 1556 550">Keeping neighbourhoods clean, green and safe</td> <td data-bbox="1556 518 1774 550">5</td> </tr> <tr> <td data-bbox="638 550 1556 582">Supporting and protecting people who are most in need</td> <td data-bbox="1556 550 1774 582">74</td> </tr> <tr> <td data-bbox="638 582 1556 614">United and involved communities: a Council that listens and leads</td> <td data-bbox="1556 582 1774 614">43</td> </tr> <tr> <td data-bbox="638 614 1556 646">Supporting out town centre, our local shopping centres and our business</td> <td data-bbox="1556 614 1774 646">9</td> </tr> </tbody> </table>	Corporate priority	Number of applications	Keeping neighbourhoods clean, green and safe	5	Supporting and protecting people who are most in need	74	United and involved communities: a Council that listens and leads	43	Supporting out town centre, our local shopping centres and our business	9
Corporate priority	Number of applications										
Keeping neighbourhoods clean, green and safe	5										
Supporting and protecting people who are most in need	74										
United and involved communities: a Council that listens and leads	43										
Supporting out town centre, our local shopping centres and our business	9										
<p>5. Who is intended to benefit from this policy and in what way?</p>	<p>Voluntary and community sector (VCS) organisations</p>										
<p>6. Is responsibility for the policy shared with another department, authority or organisation? If so:</p> <ul style="list-style-type: none"> • Who are the partners? • Who is responsible for the policy? 	<p>The policy is the responsibility of the Community & Environment directorate, however Council officers from across all Directorates were involved in grant assessment panels.</p>										
<p>Stage 2: Collecting Evidence</p>											
<p>7. What data or benchmarking information is available to facilitate the screening of this policy?</p> <ul style="list-style-type: none"> • Results from the Place Survey • Customer Satisfaction Surveys • Local or national research • Complaints or compliments received 	<p>The application and assessment process undertaken to administer the main grants programme for 2011/12 was the same as that used in 2010/11. This is an annual competitive process open to all VCS organisations who can demonstrate they meet the eligibility criteria. This process had been developed as a result of Overview and Scrutiny recommendations, consultation with the VCS, members and other stakeholders and was the subject of an EqlA in March 2010. This also concluded that the process had no differential impact on any of the protected equality groups at the time.</p> <p>Amendments were made to the assessment scoring sheet as a result of feedback from the VCS, members and other stakeholders following the 2010/11 application round. These changes were</p>										

<ul style="list-style-type: none"> CAA, liP or other assessments 	<p>reported to the Grants Advisory panel on the 2nd March 2011.</p> <p>In 2010/11 successful applicants were awarded funding on a sliding scale depending on what score had been achieved. In 2011/12 and in response to the high level of demand for funding and reduced budget available it is proposed that a single threshold is used to determine successful applications for grant funding. This threshold would mean that applications scoring 95% or above would receive 85% of the requested grant.</p> <p>The following information has been used to screen this policy:</p> <ol style="list-style-type: none"> 1. Analysis of applications according to protected characteristics that may be served based on information provided by applicants in response to question 5 of the application form for the main grants programme. (ie. Who will benefit from the project?) – see attached table. 2. Analysis of applications (for the main grants programme) according to protected characteristics, that may be served based on information provided by applicants in response to question 3c and 3d – see attached table. 3. Both analyses show the cumulative effect of using a scoring threshold to determine grant awards on protected groups likely to be served through the award of grant funds. 4. Audit report on grant application process dated March 2011 that identified if substantially less grant money is awarded, it is likely that the organisation will not be able to provide what was originally intended on their application form. 		
<p>8. Have you undertaken any consultation on this policy? Yes The grant application process was consulted on in 2009, a separate EqIA was undertaken.</p> <p>Members of the Grants Advisory panel were consulted on the use of a scoring threshold to determine grant awards for 2011/12.</p>			
<p>If yes, who was consulted? (this may include staff, members, unions, community / voluntary groups, stakeholders, residents and service users)</p> <p>See above</p>			
Equality Strand	Name of Group	What consultation methods were used?	What do the results show about the impact on

			different equality groups?
Age			
Disability			
Gender			
Race			
Religion or Belief			
Sexual Orientation			
Other (please state)	Grants Advisory panel including Voluntary Sector Adviser		

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	

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

The process has been designed to avoid adverse impact. The final assessment before awards are finally confirmed will consider any further mitigation that may be reasonably necessary in the light of the continuing duty to pay due regard to equalities and any countervailing factors.

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	

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	

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	None			None		
Disability	None			None		
Gender	None			None		
Race	None			None		
Religion or Belief	None			None		
Sexual Orientation	None			None		
Socio Economic Inequality	None			None		
<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>The voluntary and community sector in Harrow includes a range of organisations serving the diversity of Harrow's community. There are over 1,000 known organisations, most of which are not funded by the Council directly. The Council supports this sector in a number of ways including both through statutory entitlements and in this case, through the provision of a grant funding programme. The application and assessment process aims to provide a fair and transparent process which can be equally accessed by all groups. The process has been developed on the basis of recommendations from Overview and Scrutiny and VCS, member and other stakeholder feedback.</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 unlawful?	Yes		Please take legal advice	Is the impact intended?	Yes	
	No				No	

17. Have you received any complaints or compliments about the policy? If so, provide details.	The Cabinet decision of 7 th April 2011 has been the subject of a call-in which was upheld on the grounds that 'insufficient consideration of legal and financial advice ... on the grounds that there was not evidence that due regard had been given to the Council's equality duties when setting the percentage thresholds'.
18. What monitoring is in place to check the effects of the policy on equality groups?	Grant applicants provide information in question 5 of the application form on who will benefit from the project. The application form requests information on ethnicity groups, gender (including transgender), disability and faith groups. Question 5 does not request information on sexual orientation or pregnancy and maternity, however for the purpose of the analysis information from questions 3c and 3d were used.
19. How will the results of any monitoring be analysed, reported and publicised?	The results of the analysis of application forms and protected groups served by projects will be presented to Cabinet on the 17 th May and published on the Council website as part of the papers for this meeting.
20. What monitoring measures need to be introduced to ensure effective monitoring of the policy? (Include in Improvement Action Plan)	Final grant decisions are subject to the appeals process concluding, a further equality impact assessment will be undertaken at this stage before final grant awards are determined.
21. When will the policy be reviewed?	The review of the policy will be included in the overall review of grants for 2012/13.

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
Mark with an X	Continue on to Part 2 for a full assessment.		Go to Stage 4 for any actions to improve policy and sign off.

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? (<i>Answer with an X</i>)	YES		NO (Go to Q33)	X
---	-----	--	-------------------	---

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	Progress
	Final review of outcomes before notification of confirmed decisions to organisations	Kashmir Takhar	Within one day of appeals consideration		
	Assessment of need for additional mitigation	Brendon Hills/Marianne Locke	Week beg 24 th May 2011.		
	A full EQIA will be conducted on proposals for 2012/13 process	Kashmir Takhar	Before final recommendations are taken to Cabinet in July 2011.		

--	--	--	--	--	--

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

Council website as part of the publication of papers for the 17th May 2011 Cabinet meeting.

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?

Following consultation with the voluntary and community sector, further improvements will be made to the policy for 2012/13.

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?

Actions to improve the policy for 2012/13 will be considered by the Grants Advisory Panel and Cabinet.

Signed: (Lead officer completing EqIA)

Signed: (Chair of DETG)

Date:

Date: