# Full Equality Impact Assessment (EqIA) Form - Appendix 4

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

What are the proposals being assessed? <b>(Note</b> : 'proposal' includes a policy, service, function, strategy, project, procedure, restructure)	Strategies and policies being reviewed and developed through the Housing Changes Review which will set out the strategic direction for all tenures of housing in Harrow, taking account of the national policy agenda as set out in the Localism Bill and Welfare Reform proposals and local and regional priorities.
Which Directorate / Coming has the many analisity for this 2	Adults and Housing, Housing Services
Which Directorate / Service has the responsibility for this?	
Name and job title of lead officer	Alison Pegg/Jane Fernley, Housing Partnerships and Strategy Manager
Name & contact details of the other person(s) involved in	Housing Management Team
the EqIA:	
Date of assessment:	4/11/11

# Stage 1: Overview

**1**. What are the aims, objectives, and desired outcomes of your proposals?

(Also explain proposals e.g. reduction / removal of service, deletion of posts, changing criteria etc)

The Housing Strategy will set out the borough's housing objectives in terms of:

- Meeting the needs and aspirations of vulnerable people, especially older people
- Continuing to tackle homelessness and high demand, while reducing temporary accommodation
- Improving neighbourhoods and the quality of life
- Increasing the supply of housing
- Delivering high quality services

These are the current Housing Strategy objectives agreed through consultation with residents in 2006 and may be revised through the current consultation process and in light of the changing policy environment as a result of the Localism Bill and Welfare Reform proposals. The Housing Strategy will be accompanied by a number of related policy documents that will deal with the detail of changes particularly in relation to allocation of social housing, the rents levels at which new social housing is developed and the types of tenancies that will be offered to new tenants. These are all as a result of

legislative changes proposed in the Localism Bill and due to be enacted in November 2011.

The related strategies and policies are:

- Tenancy Strategy to ensure that social housing meets the needs of Harrow residents both
  now and in the future and that the council and Registered Providers make efficient use of their
  housing stock in Harrow through utilizing the new flexible tenancy and Affordable Rent options.
   Potential key policy change: Introduction of fixed term tenancies with average tenancy
  period of 5 years before review, introduction of higher rents for new social homes.
- Landlord Tenancy Policy sets out the tenancies the Council as landlord will offer to new tenants and the review process for flexible tenancies, if introduced. Potential key policy change: Introduction of fixed term tenancies with average tenancy period of 5 years before review, introduction of higher rents for new social homes.
- Homelessness Strategy sets out how we how we will work to prevent homelessness and the
  housing options for people who present as homeless. Potential key policy change: Ability to
  discharge homelessness duty by providing private rented housing rather than social
  housing, housing options to include moves out of Harrow and London.
- Allocation Policy sets out who will have priority for social housing in Harrow, including
  housing developed under the new Affordable Rent model, and the changes in priority from the
  current ones. Potential key policy change: Giving priority to new groups of applicants
  such as those in low paid employment and those who are active in their local
  community.
- Affordable Housing Policy sets out how the Council will aim to develop more affordable
  housing in the borough both by working in partnership with RPs and developers and using our
  own land assets. Potential key policy change: Introduction of fixed term tenancies with
  average tenancy period of 5 years before review, introduction of higher rents for new
  social homes.
- Private Sector Housing Strategy focuses on what the Council will do to support private sector housing both in terms of enabling eg provision of grants to bring empty homes back into use, assist people to remain living in their own homes and enforcement eg standards in the private

	rented sector.
	Supported Accommodation Strategy – sets out how the Council will meet the specific needs of vulnerable adults
	<ul> <li>HRA business Plan and Asset Management Strategy – sets out how the Council will take forward self financing proposals for the Housing Revenue Account and how it will manage and maintain the c.5, 000 Council properties over the next 30 years.</li> </ul>
	There will be related action plans for each strategy/policy which will need to be monitored and reviewed regularly to take account of changing needs, priorities and new service demands.
2. What factors / forces could prevent you from achieving these aims, objectives and outcomes?	The Localism Bill will provide the freedom to Councils to make such changes to the way they allocate and manage social housing so the future direction can be decided by Members and residents working together. However, some of the outcomes eg increasing the supply of new housing, including affordable housing are dependent on wider economic factors and the actions of private sector developers which are beyond the Council's control. In addition coalition Welfare Reform changes, some of which have already been implemented in relation to Housing Benefit, are already impacting on the ability of lower income households to make their own housing arrangements and the numbers of families approaching the Council for help with housing is increasing evidenced by the increased numbers in Bed and Breakfast.
3. How does this contribute to your Directorates Service Plan?	These strategies and policies underpin our Housing Ambition Plan ("HAP2") with a vision of "Excellent Services, valued by our communities" and with a key objective to:  • Actively involve residents in developing plans that will ensure that affordable good quality housing continues to be available across Harrow
<b>4.</b> Who are the customers? Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc.	<ul> <li>All residents of Harrow who are unable to access market housing direct</li> <li>Existing social housing tenants</li> <li>All social housing providers in Harrow – mainly Registered Providers (RP's)</li> <li>Housing staff and other staff eg in Adults, Childrens services, Place Shaping</li> </ul>
<b>5.</b> Is the responsibility shared with another department, authority or organisation? If so:	Housing Services has overall responsibility. However other Directorates contribute to delivery of objectives:

<ul> <li>Who are the partners?</li> <li>Who has the overall responsibility?</li> </ul>	Adults – assess and lead on providing services to vulnerable adults but affordable housing is key for many in terms of meeting needs in a way that cost effectively maximises individuals independence etc Place Shaping – lead on delivery of new housing supply Community and Environment – provide private sector housing services such as Disabled Facilities Grants, private sector housing enforcement action, HMO registration Children's Services -
<b>5A.</b> How are/will they be involved in this assessment?	These services are involved in various forums and through direct consultation in the development of new strategies and policies.

# Stage 2: Monitoring / Collecting Evidence / Data

**6.** What information is available to assess the impact of your proposals *(include the actual data, statistics and evidence)*? List the main sources of data, research and other sources of evidence (including full references) reviewed to determine impact on each equality group (protected characteristic). This can include results from consultations and the involvement tracker, customer satisfaction surveys, focus groups, research interviews, staff surveys, workforce profiles, service users profiles, local and national research, evaluations etc

(Where possible include data on the nine protected characteristics. Where you have gaps, you may need to include this as an action to address in the action plan)

Age (including carers of young/older people)	Locata reports/ Reports from Harrow's in-house system – Northgate/Anite, analysis of consultation responses. 29% of homeless acceptances are aged 16-24, 58% are aged 25-44, 9% aged 45-59 and whilst only 4% are aged 60 and over.
Disability (including carers of disabled people)	Locata reports/ Reports from Harrow's in-house system – Northgate/Anite. Only 2% of homeless acceptances are vulnerable due to physical disability.
Gender Reassignment	We have no information on this but have started to collect this information through the Housing Changes consultation.
Marriage / Civil Partnership	We have no information on this but have started to collect this information through the Housing Changes consultation.
Pregnancy and Maternity	Reports from Harrow's in-house housing system, Northgate/ Anite, analysis of consultation responses.

Race	P1E returns relating to homeless applications, information provided through the housing application process and recorded on Northgate/Anite. Analysis of P1E returns demonstrates that households who classify themselves as black are disproportionately more likely to be accepted as homeless – 29% compared to 24% White and 18% Asian (of these who stated their ethnicity, note that ethnicity is not known for 27%). Of the two-thirds of Council tenants who provided their ethnicity at application, the largest single group housed within the Council's stock is White at 55% whilst 21% are Asian and 16% are black. Where ethnicity is known across the total Housing Register, 32% of applicants are White, 32% are Asian and Asian and 25% are Black.			
Religion and Belief	We have no information on this group but have started to collect this information through the Housing Changes consultation.			
Sex / Gender	A report from Harrow's in-house housing system, Northgate/ Anite. 53% of homeless acceptances female lone parents with dependent children compared to 7% of male lone parents with dependent children.			
Sexual Orientation	We have no information on this but have started to collect this information through the Housing Changes consultation.			
7. Do you need to collect any additional monitor the impact on different groups		We have put together a wide range of evidence to underpin our strategic policy work. Of great importance is information relating to local housing affordability using local income data and local house cost information. All of this additional data is available in the Evidence base.  We will need to continue modelling the impact of any proposed policy changes on different groups and as additional data is recorded we will review impacts to see whether this results in a change in the assessment.		
8. Are there any other local/regional/na can inform this assessment if you have of the groups?		National and regional data for example on age and health can help to inform potential future trends. Again this is referred to in our Evidence Base which is attached.		

<b>9</b> . Have you undertaken any consultation on your proposals? (this may include consultation with staff, members, unions, community / voluntary groups, stakeholders, residents and service users)						No	
Who was consulted?	What consultation methods were used?	What did you learn from your consultation?		pact or	differ (prote		
Harrow residents	Roadshows held throughout the borough including town centre locations, housing estates and attendances at TRA meetings – in total 30 events were held, Drop in sessions in Access Harrow, web based questionnaire promoted from August – October 2011	main results relating to the equality groups is that when developing policies relating to new flexible tenancies that we continue providing older people and people with disabilities a home for life, that when deciding on how we review tenancies at the end of the fixed term that				ng ling en that are e are	
Attendance at voluntary group meetings such as Asperger forum, Northolt Road Community Group meeting, any others?	Presentation, Q&A and completion of questionnaires						
Voluntary sector consultation	Event to be held on 15 November. Mixture of presentations and workshops						

**NOTE:** If you have not undertaken any consultation as yet, you need to consider if you need to carry out any consultation. For example, if you have insufficient data/information for any equality group and you are **unable** to assess the potential impact, you may want to consult with them on your proposals as how they will affect them. Any proposed consultation needs to be **completed before** progressing with the rest of the

			involvement toolkit can be accessed via the link	below			
•	10. If you have not undertaken any consultation, explain why?						
Stage 3: Assessir	ng Impact	and Analys	is				
impact, if so state	whether thi	s is an adve	bout the impact on different groups? Consider whetherse or positive impact? How likely is this to happen?  wwwwwwwwwwwwwwwwwwwwwwwwwwwwwwwwwww	·			
Protected Characteristic	Positive	Adverse	Explain what this impact is, how likely it is to happen and the extent of impact if it was to occur.	What measures can you take to eliminate or reduce the adverse impact(s)? E.g. consultation, research, implement equality monitoring etc (Also Include these in the Improvement Action Plan at Stage 5)			
Age (including carers of young/older people)	V	V	Younger people are more likely to be affected by the key policy changes highlighted above as any changes will only affect new tenants rather than existing tenants. However, the purpose of some of the changes is to use the existing social housing more effectively so this would benefit those people currently waiting for housing or future applicants.  Some young people have a priority need for housing under the homelessness legislation and are more likely to be affected by any change in the way that the main homelessness duty can be fully discharged. Combined with the change in Housing Benefit which restricts some young	The next stage of the development of the strategies is to undertake more detailed modelling on the impact of proposed key policy changes including whether there are adverse equality impacts in relation to age and how these might be mitigated and then carry out further consultation. Once developed the policies would be subject to rigorous monitoring for which a framework will be developed.			

people in the private rented sector to a room in a shared house, the private rented sector may not

be suitable accommodation.

Disability (including carers of disabled people)	√	√	Disabled people, including those with carers, are more likely to be unable to access private sector housing and are therefore more likely to seek assistance from the Council. We already have a number of policies in place to mitigate this impact eg that 10% of all new social housing should be built to full wheelchair standard and these will continue. Disabled applicants already have priority for social housing and this will continue. Consultation outcomes indicate that it is generally agreed that disabled people should be offered lifetime tenancies.  People who are disabled or who are mentally ill are considered to have a priority need for housing under the homelessness legislation and are therefore more likely to be affected by any change in the way that the main homelessness duty can be fully discharged.	The next stage of the development of the strategies is to undertake more detailed modelling on the impact of proposed key policy changes including whether there are adverse equality impacts in relation to disability, how these might be mitigated for example by only bringing the homelessness duty for disabled people to an end by offering social housing, by offering longer tenancies than for other groups. The proposals would be subject to further consultation. Once developed the policies would be subject to rigorous monitoring for which a framework will be developed.
Gender Reassignment			There is limited data with regard to this group. Priority for social housing already includes medical condition for which people with gender reassignment may fall within. There is no proposal to change this priority so there should be no impact on this group that is any different to any other group.	The next stage of the development of the strategies is to undertake more detailed modelling on the impact of proposed key policy changes including whether there are adverse equality impacts in relation to gender reassignment and then carry out further consultation. Once developed the policies would be subject to rigorous monitoring for which a framework will be developed.
Marriage and Civil Partnership			There is limited data with regard to this group. We have no reason to suppose that the proposed policy changes will have an impact either positively or adversely on this group. Current policies take into account family circumstances whether marriage, civil partnership or co-	The next stage of the development of the strategies is to undertake more detailed modelling on the impact of proposed key policy changes including whether there are adverse equality impacts in relation to marriage and civil partnership and then carry out further

			habitation and this is intended to continue.	consultation. Once developed the policies would be subject to rigorous monitoring for which a framework will be developed.
Pregnancy and Maternity	√	√	The majority of homeless acceptances are households with dependent children or which include a pregnant woman and are therefore more likely to be affected by any change in the way that the main homelessness duty can be fully discharged. However, an offer of private rented accommodation may still be suitable to meet the households housing needs.  Current policies take into account family circumstances including pregnancy and maternity which is accorded priority status for social housing. Therefore policies which increase social housing opportunities may have a positive impact on this group.	The next stage of the development of the strategies is to undertake more detailed modelling on the impact of proposed key policy changes including whether there are adverse equality impacts in relation to pregnancy and maternity and then carry out further consultation. Once developed the policies would be subject to rigorous monitoring for which a framework will be developed.
Race	<b>√</b>	<b>√</b>	People from certain BAME communities are more likely to be unable to access private sector housing and are therefore more likely to seek assistance from the Council. Proposed policy changes may have a positive impact if they create more access to social housing. However any change in policy relating to the allocation of social housing must be modelled to assess potential adverse impact.  Households from certain BAME groups are more likely to be accepted as homeless (based on evidence of known BAME background). People from BAME groups are therefore more likely to be affected by changes in the way that the homelessness is discharged and the impacts of	The next stage of the development of the strategies is to undertake more detailed modelling on the impact of proposed key policy changes including whether there are adverse equality impacts in relation to race and then carry out further consultation. Once developed the policies would be subject to rigorous monitoring for which a framework will be developed.

			taking up the flexibility introduced by the Localism Bill will need to be modelled in developing an agreed policy for Harrow.	
Religion or Belief			There is limited data with regard to this group. We have no reason to suppose that the proposed policy changes will have an impact either positively or adversely on this group provided that any policies eg relating to review of tenancies, if fixed term tenancies are introduced, take into account cultural needs.	The next stage of the development of the strategies is to undertake more detailed modelling on the impact of proposed key policy changes including whether there are adverse equality impacts in relation to religion/belief and then carry out further consultation. Once developed the policies would be subject to rigorous monitoring for which a framework will be developed.
Sex	√	1	Current policies take into account family circumstances regardless of sex. Lone parents, of whom the majority are women, are more likely to be a priority for social housing and therefore the impact of policies relating to changing priorities or different housing options will need to be modelled to assess potential adverse impact. Eg giving priority to families in low paid employment may favour two parent families over lone parents.	The next stage of the development of the strategies is to undertake more detailed modelling on the impact of proposed key policy changes including whether there are adverse equality impacts in relation to sex and then carry out further consultation. Once developed the policies would be subject to rigorous monitoring for which a framework will be developed.
Sexual Orientation			There is limited data with regard to this group. We have no reason to suppose that the proposed policy changes will have an impact either positively or adversely on this group.	The next stage of the development of the strategies is to undertake more detailed modelling on the impact of proposed key policy changes including whether there are adverse equality impacts in relation to sexual orientation and then carry out further consultation. Once developed the policies would be subject to rigorous monitoring for which a framework will be developed.

Literacy		√	Communicating the change in any policy changes may impact adversely on those people who are not able to read written information either through information leaflets or on the web.	
Socio Economic Inequality	<b>√</b>	√	The Council only assists people who are unable to afford market housing and therefore any of the policies under consideration may either have a positive impact eg by increasing the supply of affordable housing or alternative housing options or an adverse impact if the affordable housing is not locally affordable.	The next stage of the development of the strategies is to undertake more detailed modelling on the impact of proposed key policy changes including whether there are adverse equality impacts in relation to socio economic inequality and then carry out further consultation. Once developed the policies would be subject to rigorous monitoring for which a framework will be developed.

**12.** Cumulative impact – Are you aware of any cumulative impact? For example, when conducting a major review of services. This would mean ensuring that you have sufficient relevant information to understand the cumulative effect of all of the decisions.

#### **Example:**

A local authority is making changes to four different policies. These are funding and delivering social care, day care, and respite for carers and community transport. Small changes in each of these policies may disadvantage disabled people, but the cumulative effect of changes to these areas could have a significant effect on disabled people's participation in public life. The actual and potential effect on equality of all these proposals, and appropriate mitigating measures, will need to be considered to ensure that inequalities between different equality groups, particularly in this instance for disabled people, have been identified and do not continue or widen. This may include making a decision to spread the effects of the policy elsewhere to lessen the concentration in any one area.

This EQIA has been undertaken taking into account all the potential policy changes and wider welfare reforms as they all impact on each other. In taking forward the further modelling work the intention is to look at the cumulative impact of all the potential changes before recommending whether each policy change is progressed.

**13.** How do your proposals contribute towards the requirements of the Public Sector Equality Duty (PSED), which requires the Council to have due regard to eliminate discrimination, harassment and victimisation, advance equality of opportunity and promote good relations between

different groups.				
•	e actions of your proposals, for for for parents/carers, IT equipmen	example literature will be availant will be DDA compliant etc)	able in large print, Braille and	community languages,
Equality Group	Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Advance equality of opportunity between people from different groups	Foster good relations between people from different groups	What actions can you take to meet these requirements? (Also include these in the Improvement Action Plan at Stage 5)
Age (including carers of young/older people)	The development of the Housing Changes Review policies through wide consultation with residents alongside a comprehensive evidence base will ensure that impacts on this group are taken into account.	Consultation has been undertaken in many different ways to enable participation in particular from seldom heard groups such as young people, people from BAME communities, and people with disabilities.	The purpose of the Housing Changes review is to ensure that the impacts on making the different policy changes are considered across the board, that development of policies includes input from a wide range of Harrow residents, that the reasons and rationale for making any changes are widely publicised in formats that are easily accessible to all, that publicising the evidence and reasons for policy changes also assists with dispelling myths that some groups of the community are more likely to get social housing than others.	<ul> <li>Publicise evidence and reasons for policy changes in a wide number of ways</li> <li>Ensure a variety of community and voluntary groups are involved in developing policies.</li> </ul>
Disability (including carers of disabled people)	Ditto	Ditto	Ditto	Ditto
Gender Reassignment	Ditto	Ditto	Ditto	Ditto
Marriage and Civil	Ditto	Ditto	Ditto	Ditto

Partnership				
Pregnancy and	Ditto	Ditto	Ditto	Ditto
Maternity				
Race	Ditto	Ditto	Ditto	Ditto
Religion or Belief	Ditto	Ditto	Ditto	Ditto
Sex	Ditto	Ditto	Ditto	Ditto
Sexual Orientation	Ditto	Ditto	Ditto	Ditto

14. Is there any evidence or concern that direct or indirect 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.

**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.

		Age (including carers)	Disability (including carers)	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation
Direct	Yes									
Direct	No		$\sqrt{}$	$\checkmark$	$\sqrt{}$			$\sqrt{}$	$\sqrt{}$	$\sqrt{}$
Indirec	Yes									
mairec	No		V	V		√	V			

If you have answered 'yes' to any of the above you need to stop and rethink and should not proceed with your proposals. (You are also encouraged to seek Legal Advice)

# Stage 4: Decision

To the case indicate which of the following statements best december the statement of your Equation (1)	
Outcome 1 – No change required: when the EqIA has not identified any potential for discrimination or adverse impact and all	
opportunities to promote equality are being addressed.	
Outcome 2 – Adjustments to remove adverse identified by the EqIA or to better promote equality. List the actions you propose to	V
take to address this in the Improvement Action Plan at Stage 5	

Outcome 3 – Continue with proposals despite having identified some potential for adverse impact or missed opportunities to promote equality. In this case, the justification needs to be included in the EqIA and should be in line with the PSED to have 'due regard'. In some cases, compelling reasons will be needed. You should also consider whether there are sufficient plans to reduce

15 Please indicate which of the following statements best describes the outcome of your FgIA ( ✓ tick one box only)

the negative impact and/or plans to monitor the impact. (explain this in 15A below)	
Outcome 4 - Stop and rethink: when your EqIA shows actual or potential unlawful discrimination. (You are also encouraged to	0
seek Legal Advice)	
<b>15A.</b> If your EqIA is assessed as <b>outcome 3</b> , explain your justification with full reasoning to continue with your proposals?	

#### Stage 5: Making Adjustments (Improvement Action Plan) 16. List below any actions you plan to take as a result of this impact assessment. This will include any actions identified throughout the EqIA. Area of potential Resource adverse impact e.g. **Action proposed Lead Officer Timescale Progress** implication Race, Disability Age, Disability, To undertake more Alison Pegg/Jane By April 2012 None – included with detailed modelling on the Pregnancy and Fernley the Housing Changes Maternity, Race, Sex, impact of proposed key Review Socio Economic policy changes in order to Inequality assess whether there are adverse equality impacts and how these will mitigated or offset by positive outcomes. An appendix of the proposed next steps is attached and includes for further consultation including with community and seldom heard groups. This EQIA will be updated as the modelling work is completed and the final policy proposals formulated. Agree monitoring framework.

# Stage 6 - Monitoring

The full impact of the decision may only be known after the proposals have been implemented, it is therefore important to ensure effective monitoring measures are in place to assess the impact.

<b>17.</b> How will you monitor the impact of the proposals once they have been implemented? How often will you do this?	Proposed policy changes will be reported to Cabinet for approval and each policy/strategy will have an accompanying action plan which will include equality monitoring.
18. What monitoring measures need to be introduced to ensure effective monitoring of the policy? (Also Include in Improvement Action Plan at Stage 5)	Monitoring of homeless acceptances, discharge of homelessness duty by equality group and tenure discharged to, rent levels and local affordability, tenancies offered by equality group, average length of tenancy for flexible tenancies(if introduced), reasons for not renewing flexible tenancies (if introduced)
<b>19.</b> How will the results of any monitoring be analysed, reported and publicised?	At the present time we report performance quarterly to Improvement board and to our Residents forum.  Performance information is also published in our Homing In magazine which is sent to all tenants and leaseholders. We would also publish performance against agreed action plans on the web.
<b>20.</b> Have you received any complaints or compliments about the policy, service, function, project or decision being assessed? If so, provide details.	We have received positive feedback from residents involved in the Housing Changes Review on both the promotion of the potential changes and impacts on local people and our efforts to involve residents in shaping the strategies and policies.

# Stage 7 – Reporting outcomes

The completed EqIA must be attached to all committee reports and a summary of the key findings included in the relevant section within them.

EqIA's will also be published on the Council's website and made available to members of the public on request.

# **21.** Summary of the assessment

**NOTE:** This section can also be used in your Cabinet reports etc but you must ALSO attach the full EqIA to the report

- What are the key impacts both adverse and positive?
- What course of action are you advising as a result of this EqIA?
- > Are there any particular groups affected more than others?
- Do you suggest to proceeding with your proposals although an adverse impact has been identified?

The findings of the Council's full EQIA indicate there may be adverse impacts on certain protected characteristics particularly in respect of age, disability, sex, pregnancy and maternity and race if all of the key policy changes are introduced without further work to model the possible impacts – both adverse and positive. The potential key impacts are that young people, people with disabilities, lone parent households in the main headed by women, households with dependent children and BAME households may have less access to secure and affordable housing.

However, adoption of the key policy changes may also result in increased opportunities to find secure and affordable housing although this may not be in Harrow or on the same terms and conditions as existing social housing tenants.

Further work is required to consider this in more detail in particular modelling the potential benefits of policy changes and the "winners and losers" and is included in the next steps action plan.

**22**. How will the impact assessment be publicised? E.g. Council website, intranet, forums, groups etc

Council website, intranet, sent to various partnership meetings including Registered Providers forums, Single homeless forum, Harrow federation of tenants and residents associations (HFTRA) etc.

intranet, forums, groups etc					
Stage 8 - 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) to be signed off.					
23. Which group or committee considered, reviewed and agreed the EqIA and the Improvement Action Plan?	Adults and Housing Equalities Task Group				
Signed: (Lead officer completing EqIA)	Alien Pag	Signed: (Chair of DETG)	Signed off by Carol Yarde		
Date:	4 November 2011	Date:	11 November 2011		