

Equality Impact Analysis Full Tool with Guidance

Overview

This Tool has been produced to help you analyse the likelihood of impacts on the protected characteristics – including where people are represented in more than one– with regard to your new or proposed policy, strategy, function, project or activity. It has been updated to reflect the new public sector equality duty and should be used for decisions from 5th April 2011 onwards. It is designed to help you analyse decisions of high relevance to equality, and/or of high public interest.

General points

- 1. 'Due regard' means the regard that is appropriate in all the circumstances. In the case of controversial matters such as service closures or reductions, considerable thought will need to be given the equalities aspects.
- 2. Wherever appropriate, and in all cases likely to be controversial, the outcome of the EIA needs to be summarised in the Cabinet/Cabinet Member report (section 08 of this tool) and equalities issues dealt with and cross referenced as appropriate within the report.
- 3. Equalities duties are fertile ground for litigation and a failure to deal with them properly can result in considerable delay, expense and reputational damage.
- 4. Where dealing with obvious equalities issues e.g. changing services to disabled people/children, take care not to lose sight of other less obvious issues for other protected groups.

Timing, and sources of help

Case law has established that having due regard means analysing the impact, and using this to inform decisions, thus demonstrating a conscious approach and state of mind ([2008] EWHC 3158 (Admin), here). It has also established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, through to the recommendation for decision. It should demonstrably inform, and be made available when the decision that is recommended. This tool contains guidance, and you can also access guidance from the EHRC here. If you are analysing the impact of a budgetary decision, you can find EHRC guidance here. Advice and guidance can be accessed from the Opportunities Manager: PEIA@Ibhf.gov.uk or ext 3430.

Full Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2011/12 Q3
Name and details of policy, strategy, function,	Title of EIA: The Review of Resident Involvement and the Levy in LBHF
project, activity, or programme	The Residents Involvement Review commenced on the September 2011.
programme	The proposal in the Cabinet report is designed to improve and deliver good practice of the Councils Resident Involvement Strategy. This will include the removal of the Levy and implementation of the five methods of involvement;
	 Improving local area Improving customer service Making documents easier to understand Training for residents with difficulties TRA/Hammersmith and Fulham Federation of Tenants and Residents Associations
Lead Officer	Name: Jo Rowlands Position: Assistant Director Housing and Regeneration Department Email: jo.rowlands@lbhf.gov.uk Telephone No: 0208-753- 1313
Date of completion of final EIA	· ·

Section 02	Scoping of Full EIA
Plan for completion	Timing December 2011 and January 2012
-	Resources Officer Time
	Lead Officer Jo Rowlands

What is the policy, strategy, function, project, activity, or programme looking to achieve? The proposal in the Cabinet report that presents the revised Resident Involvement Strategy will improve the Councils direct liaison and engagement with its residents and with the existing resources negate the need to have a direct levy on rents.

The Residents' Involvement Strategy and its principles will be used as to drive continuous improvement, quality assurance and value for money to ensure our services are effective and efficient. Specifically, the principles are underpinned by five mechanisms, which are analysed here as they are the methods by which the Strategy will be delivered (e.g. when the Council discharges its functions).

Information: Protected characteristics and the Public Sector Equality Duty

The Public Sector Equality Duty (PSED) states that in the exercise of our functions and services, we must have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited under the Act;
- Advance equality of opportunity between people who share a protected characteristic and those who do not;
 and
- Foster good relations between people who share a protected characteristic and those who do not.

To ensure that we are achieving the above requirements we must;

- Remove or minimise disadvantages suffered by people due to their protected characteristics;
- Take steps to meet the needs of people from protected groups where these are different from the needs of other people; and
- Encourage people from protected groups to participate in public life or in other activities where their participation is disproportionately low

The Act states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.

Age	Analysis of impact on age including due regard to PSED (above).		
	Pre-consultation diversity data shows the following in terms of breakdown for		

age:					
age group	househol ds	percent			
16 to 24	441	4%			
25 to 34	1,417	11%			
35 to 44	2,330	19%			
45 to 54	2,785	22%			
55 to 64	1,945	16%			
65 to 74	1,728	14%			
74+	1,726	14%			
unknown	115	1%			
	12,487	100%			
neutral impact for the	ose on Housing E gy and assist res	Benefit. The sidents beco	in a positive impact and resources provided to me involved will not be affected es will be used.		
Improving local are	ea and improving	g customer	service		
he Council's Reside he age of 16-34 and community. During t group was not repres Those that are unde nere, and so they are	ent Involvement and the strategy will the consultation strated and resider the age of 16 years additionally inclined.	genda. We ensure that sessions it wents above the ears are too luded under	re less likely to be involved in have 15% of tenants between we target this section of the as apparent that this age 34 were well represented. young to be legally protected Children's Right. There will be dents to become involved and	н	

	Making documents easier to understand The strategy provides an opportunity for a wide range of communication and consultation mechanisms that will attract different ages including a readers panel. By targeting younger people, their views on how to communicate with this section of the community will have a positive impact on Resident Involvement. Providing documents in various forms e.g. large print will assist older people and people with visual impairments to participate effectively. These improvements will also assist those of all ages with literacy issues.	Н	+
	Work with TRAs Traditionally residents involved in TRAs are over 34 years; however as already highlighted proactive work will take place to involve younger residents and this	н	+
	in turn will be a positive impact. There is a lack of data on the Protected Characteristics of residents that are currently involved and the proposed strategy will address this by monitoring the diversity of those that become and are currently involved.		
Disability	Analysis of impact on disability including due regard to PSED (above).		
	The Equality Act 2010 states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the duty may involve treating some people more favourably than others.		
	The Act also places a statutory duty on public bodies to make reasonable adjustments for disabled people.		
	 Demonstrate how you have attempted to address what barriers disabled 		

people might face, and how the policy could help remove them.		
Tenants and Disability Census 2011 data gives 14.66% as the percentage of residents who consider themselves to have a Limiting Long-Term Illness. For further context, 4.93% of the borough identified themselves as permanently sick/disabled (2001 Census). However, this does not directly correspond to a disability as is defined by the Equality Act 2010, as the question in the census did not ask respondents if they were registered disabled. The review will encourage residents with disabilities to engage in focus groups and other forms of involvement mechanisms, which will have their views taken into consideration.		
Removal of Levy		
The removal of the levy will have a positive impact on residents with disabilities as the 25p per week charge will not be paid as part of the weekly rent and will not be a small weekly outgoing for employed residents resulting in a positive impact and neutral impact for those on Housing Benefit. The resources provided to implement the strategy and assist residents become involved will not be affected due to the removal of the levy as existing resources will be used.	L	+
Improving Local area		
The coordination and planning of meetings takes into consideration venue accessibility issues. Regeneration programmes will actively seek the views of disabled residents to ensure that their voices are heard and have an impact in the overall delivery of the programme. This is evident in the development of the Tudor Rose Community centre where accessibility is at the forefront of the newly built facility. The strategy has identified working with Sheltered Housing Schemes where disabilities are more common due to the age of the residents and will proactively take forward any agreed actions that they perceive as a concern. The strategy demonstrates that the council will take steps to take account of disabled people's disabilities.	Н	+
Improving Customer Service		

With the introduction of the Repairs Working Group and the Local Residents Panel residents' views, ideas for improvements and general concerns will allow dialogue to take place with this group. By liaising with the Equalities Champions Group, where disabled people are also represented this will assist in providing expertise and first hand knowledge of how to improve services for this section of the community.	I	+
There are also plans to hold focus groups and workshops to support the understanding of residents and specific characteristics will be approached to take on board their concerns and use them to improve service delivery. Overall the proposal is designed to meet the needs and improve the quality of life for all residents that receive a service from Housing and Regeneration and Department.		
Making documents easier to understand		
Documents will be produced with additional improvements provided by the readers' panel and through other mechanisms. Currently information is produced in plan English, and Braille, easy read format and large print are provided on request. The strategy will provide additional methods of communication that will address any gaps that are identified through the proposed involvement mechanisms and is of high relevance and will have a positive impact on disabled people.	Н	+
Training for Residents with difficulties		
The strategy will have a positive impact on this group. Through the Local Residents' Panel with representation on this forum of disabled residents and through additional mechanisms lessons learnt will feed into this structure. By monitoring the complaints and how they are resolved will provide the council with learning techniques that will assist in improving the complaints process acknowledge the issues disabled residents experience and improve the services provided.	Н	+
Work with TRAs		

	With the proposal of an administrative resource to support TRAs and the strategy it will assist TRAs comply with legal requirements and regulations, keep up to date with good practice, legal requirements and regulations relating to disability and other protected characteristics.	Н	+
Gender reassignment	Analysis of impact on gender reassignment including due regard to PSED. Research relating to LBGT (lesbian, gay, bisexual, transgender) population estimates notes that: In 2005, the Department for Trade and Industry published a figure of 6% as the percentage of LGBT people in the general population as part of its research in relation to new equalities legislation. The number of LGBT people in London is thought to be anywhere between 6% and 10% of the total population, increased by disproportionate levels of migration. This equates to an urban population of between 450,000 and 750,000 people.		
	[Kairos in Soho: p27, 2007] This estimate does include LGB as well as trans, and so it is not precise. There are no official statistics as data on this group is not routinely collected (e.g. through the Census). None of the proposed mechanisms has, so far, emerged as a particular relevance to, or as having a particular impact on, this protected characteristic. However, we are consulting on the Residents' Involvement Strategy and welcome views Removal of Levy	L	1
	The removal of the levy will have a positive impact on all residents as the 25p per week charge will not be paid as part of the weekly rent and will not be a small weekly outgoing for employed residents resulting in a positive impact and neutral impact for those on Housing Benefit. The resources provided to implement the strategy and assist residents become involved will not be affected due to the removal of the levy as existing resources will be used.	L	+

Marriage and Civil Partnership	Analysis PSED. The prince that are I grounds this case	ciples and being pro and so m	d mechai vided to	nisms, ar people w	nd the rei	moval of	the levy characte	are not s	ervices particular	N/A	N/A
Pregnancy and maternity	(number	ot collect live birth s and per	ed on thi s by usua centages	is group al area o	in Housir	ng. Howe	ver, ONS	S data fo	r 2010,		
	Age of r	mother at Under	Under								
	ages	18	20	20-24	25-29	30-34	35-39	40-44	45+		
	2,773	18	69	300	521	964	740	165	14		
	Age of r	mother at	birth								
	All	Under	Under	20-24	25-29	30-34	35-39	40-44	45+		
	Ages	18	20								
	63.6	8.6	19.9	40.2	51.1	107.3	100.6	27.0	2.7		
	characte rent and a positive resource	oval of th ristic as t will not b e impact s provide will not b	e levy wi he 25p p e a smal and neut ed to impl	er week I weekly ral impad ement th	charge woutgoing the strate of	vill not be for empl se on Ho gy and as	paid as oyed resusing Be	part of the idents respectively. The dents because the parts because the parts of t		L	+

	accessibility issues, a when people are able for those mothers wit programmes will active	planning of med and these include to attend, which h small babies a vely seek the vie nent to them in c	etings takes e baby chang he might need ind other child was of all resident predetents.	nto consideration venue ging facilities and times of day to be after school has started	н	+
		rily be of high rel any improvemen	levance to w	omen with this protected ur communications easier to	L	1
	Training for residen This is not relevant to Work with TRAs This will not necessar	this protected c	characteristic	en with this protected	N/A	N/A
	abarastariatia but tha	مرميط النبيب	4.1			
	characteristic but the	y will benefit from	n the genera	I improvements in the service.	L	1
Race	Analysis of impact on			•	L	/
Race	Analysis of impact on			•	L	/
Race	Analysis of impact on	race including o	due regard to	•	L	/
Race	Analysis of impact on census ethnicity category British Irish	n race including of househol ds	due regard to	•	L	/
Race	Analysis of impact on census ethnicity category British Irish any other White	househol ds 4,567 720	percent 37% 6%	•	L	/
Race	Analysis of impact on census ethnicity category British Irish any other White background	househol ds 4,567 720 723	percent 37% 6%	•	L	/
Race	Analysis of impact on census ethnicity category British Irish any other White background Caribbean	househol ds 4,567 720 723 1,063	percent 37% 6% 6% 9%	•	L	/
Race	Analysis of impact on census ethnicity category British Irish any other White background Caribbean African	househol ds 4,567 720 723	percent 37% 6%	•	L	/
Race	Analysis of impact on census ethnicity category British Irish any other White background Caribbean	househol ds 4,567 720 723 1,063	percent 37% 6% 6% 9%	•	L	/
Race	Analysis of impact on census ethnicity category British Irish any other White background Caribbean African any other Black	househol ds 4,567 720 723 1,063 1,510	percent 37% 6% 6% 9% 12%	•	L	/

Indian	84	1%				
any other Asian	306	2%				
Chinese	24	0%				
White & black Caribbean	249	2%				
White & black African	131	1%				
White & Asian	65	1%				
any other mixed						
background	73	1%				
Other	734	6%				
Prefer not to say	41	0%				
Unknown	1,714	14%				
	12,487	100%				
Involvement strategy will engage with this group. A categories above shows these tenancies as comp 77.83% (meaning that BN 17.83 percentage points. will have a positive effect encouraged to participate Improving Local area	proactively to proactively to proximately a disproportion ared to the EME is 22.17% Aiming to irrouple in order to proceed to proceed to procedure t	ake steps by 40% of co onately high Borough Pro 6 for the Bor ncrease part p, and resid promote goo	ner number of residents in file, where total White is rough). This is a difference ticipation from BME residents lents of all races will be od relations.			
Improvements as outlined groups to participate in the positive impact on this grathis will assist in widening the design of Local Offers residents in developing the	d in the strate in the improvement oup. By encourage the diversition, and with the nese, this wind who idents.	egy will enco ent of their louraging acc y and involvence ill assist the	e approach to Minor Estates ourage residents of all race ocal area. This will have a cess to all community groups, ement of wider residents. With ent of wider representation of department in learning about rtment can actually offer as an	Н	+	

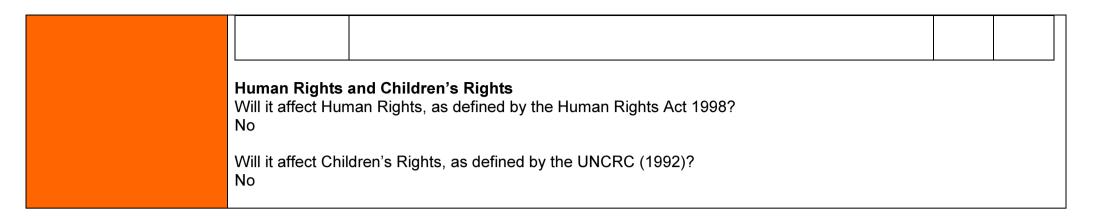
With the introduction of the Repairs Working Group and the Local Residents Panel residents' views, ideas for improvements and general concerns will allow dialogue to take place with this group. By liaising with the Equalities Champions Group and other forums where people of all races are also represented will assist in providing expertise and first hand knowledge of how to improve services for all section of the community. There are also plans to hold focus groups and workshops as required to support residents to take on board their concerns and use them to improve service delivery. It has not emerged during consultation, that this has a specific relationship to any race group. Overall the proposal is designed to meet the needs and improve the quality of life for all residents that receive a service from the Housing and Regeneration Department. Training for Residents with difficulties	Н	+
Through the Local Residents Panel and with positive engagement with this section of the community it will provide a more diverse representation and in turn the strategy will have a positive impact on all race groups. By monitoring complaints and how they are resolved will provide the council with learning techniques that will assist in improving the complaints process and improve the services provided.	Н	+
Work with TRAs With the proposal of an administrative resource to support TRAs and the strategy it will assist TRAs comply with legal requirements and regulations, keep up to date with good practice, legal requirements and regulations relating to disability and other protected characteristics. The strategy has also proposed that by monitoring the diversity of those that become and are currently involved will be a core activity and identify areas that need to be addressed that may be of relevance to one or more race groups. Removal of Levy	Н	+
The removal of the levy will have a positive impact on all race groups with this protected characteristic as the 25p per week charge will not be paid as part of		

	resulting in a positive The resources provided	ve impact and neu vided to implement	tral impact for the strategy	going for employed residents or those on Housing Benefit. and assist residents become the levy as existing resources	L	+
Religio f (inclu- non-be	ding	· ·		d to PSED (above). ws:		
	Faith	househol ds	percent			
	Christian	427	3%			
	Muslim	206	2%			
	Jewish	1	0%			
	Hindu	2	0%			
	Buddhist	2	0%			
	Sikh	1	0%			
	not say	33	0%			
	other	22	0%			
	no religion	106	1%			
	unknown	11,687	94%			
		12,487	100%			
	<u> </u>	1-1111				
	Improving Local a	ıraa				
			oice and the	approach to Minor Estates		
				ourage residents of all race	Н	+
				ocal area. This will have a		
		•				
				s to all religious groups will		
	assist in widening t	ne diversity and in	voivement o	i wider residents.		
		0				
	Improving Custon			10 1 10 11 15		
				nd the Local Residents Panel		
				may be relevant to religious	ı	+
	•	•	•	ist in providing expertise and	_	'
	suggestions for imp	proving services fo	r all section	of the community. There are		

	also plans to hold focus groups and workshops to support the understanding of residents to take on board their concerns and use them to improve service delivery. Overall the proposal is designed to meet the needs and improve the quality of life for all residents that receive a service from the Housing and Regeneration Department. Training for Residents with difficulties Through the Local Residents Panel and with positive engagement with this section of the community it will provide a more diverse representation and in turn the strategy will have a positive impact on all religious groups. By monitoring complaints, the Council will have live information on issues that may	L	+
	Work with TRAs With the proposal of an administrative resource to support TRAs and the strategy it will assist TRAs comply with legal requirements and regulations, keep up to date with good practice, legal requirements and regulations relating to disability and other protected characteristics. The strategy has also proposed that by monitoring the diversity of those that become and are currently involved will be a core activity and identify areas that need to be addressed that may be of relevance to one or more race groups.	Н	+
	Removal of Levy The removal of the levy will have a positive impact on all religious groups with this protected characteristic as the 25p per week charge will not be paid as part of the weekly rent and will not be a small weekly outgoing for employed residents resulting in a positive impact and neutral impact for those on Housing Benefit. The resources provided to implement the strategy and assist residents become involved will not be affected due to the removal of the levy as existing resources will be used	L	+
Sex	Analysis of impact on sex including due regard to PSED (above) In H&F there are 165,242 adults, of whom 78,993 (48%) are male and 86,249 (52%) are female. The household data is as follows		

female 7,641 61% male 4,845 39% unknown 1 0% 12,487 100%
unknown 1 0%
12,487 100%
Through the consultation process and the series of meetings and workshops held both men and women were equally represented. Given that women are disproportionately represented in the household data (by 9 percentage points), this means that there is a possibility we may not have proportionately captured their views. This has also been demonstrated in the make up of tenants that have submitted applications to be members of the Residents Panels.
Where a gap in representation is identified the strategy will assist in addressing this gap, which will be positive.
Improving local area and improving customer service During consultation, it did not emerge that any improvements under this method of involvement was of any particular relevance to men or to women, although the improvements will benefit both sexes.
Making documents easier to understand This will not be of high relevance to men and women, but it will have a small positive benefit in terms of making our information easier for all residents.
Work with TRAs
During consultation, it did not emerge that any improvements under this method of involvement was of any particular relevance to men or to women, although

	(women proportionately more so than men) as the 25p per week charge will not be paid as part of the weekly rent and will not be a small weekly outgoing for employed residents resulting in a positive impact and neutral impact for those on Housing Benefit. The resources provided to implement the strategy and assist residents become involved will not be affected due to the removal of the levy as existing resources will be used.	M	+
Sexual Orientation	Analysis of impact on sexual orientation including due regard to PSED (above) Research relating to LBGT (lesbian, gay, bisexual, transgender) population estimates notes that: In 2005, the Department for Trade and Industry published a figure of 6% as the percentage of LGBT people in the general population as part of its research in relation to new equalities legislation. The number of LGBT people in London is thought to be anywhere between 6% and 10% of the total population, increased by disproportionate levels of migration. This equates to an urban population of between 450,000 and 750,000 people. [Kairos in Soho: p27, 2007] This estimate does include trans as well as LGB, and so it is not precise. There are no official statistics as data on this group is not routinely collected (e.g. through the Census). None of the proposed mechanisms has, so far, emerged as a particular relevance to, or as having a particular impact on, this protected characteristic. Removal of Levy	L	/
	The removal of the levy will have a positive impact on all residents as the 25p per week charge will not be paid as part of the weekly rent and will not be a small weekly outgoing for employed residents resulting in a positive impact and neutral impact for those on Housing Benefit. The resources provided to implement the strategy and assist residents become involved will not be affected due to the removal of the levy as existing resources will be used.	L	+



Section 03	Analysis of relevant data and/or undertake research
Documents and data reviewed	Data provided through I –World system collected from tenants' information of the head of household and enhanced over the years from the Status Survey and Diversity surveys. Kairos in Soho, London's LGBT Voluntary Sector Infrastructure Project, 2007 Census 2001 Live Births by Usual Area of Residence, 2010 (From table 2a: http://www.ons.gov.uk/ons/publications/re-reference-tables.html?edition=tcm%3A77-222793)
New research	No New Research

Section 04	Undertake and analyse consultation
Consultation	Consultation commenced with residents on the 6 th of January and concludes on the 27 th of January. Details of consultation findings are outlined in the Resident Involvement Strategy and forms part of the Cabinet Report
	Consultation on the Removal of the Tenants Levy is included in the consultation period outlined above
Analysis	What did you learn from your consultation about your proposed or existing policy relation to the protected characteristics and/or human and children's rights?
	The development of the strategy has included and highlighted the views and concerns residents have raised

during the consultation process. This has been defined under the five mechanisms;

- Improving Local Area
- Improving Customer Service
- Making documents easier to understand
- Training for residents with difficulties
- Work with Tenants and Residents Associations

The assessment has outlined the impact the proposals will have on each protected characteristic and the degree of relevance applied.

Section 05	Analysis of impact and outcomes
Analysis	What has your consultation and analysis of data shown?
	 The independent review of Resident Involvement found that the current arrangements for Resident Involvement, including the Tenants Levy, 'Fall short of Best Practice' The Council must improve its direct engagement with its residents and can do this with existing resources negating the need to have a direct Levy on rents. There is no evidence of lawful or unlawful discrimination.

Section 06	Reducing any adverse impacts
Outcome of Analysis	There are no adverse impacts

Section 07	Action Plan
Action Plan	
	An action plan to the Resident Involvement Strategy will be developed.

Section 08	Agreement, publication and monitoring
Chief Officer sign-off	Name:
	Position:
	Email:
	Telephone No:
Key Decision Report	Date of report to Cabinet/Cabinet Member: 5 March 2012
	Confirmation that key equalities issues found here have been included: Yes
Opportunities Manager	Name: Carly Fry
for advice and guidance	Position: Opportunities Manager
only	Date advice / guidance given: 19 January 2012
	Email: PEIA@lbhf.gov.uk
	Telephone No: 020 8753 3430