

LBHF Equality Impact Analysis Tool

Conducting an Equality Impact Analysis

An EqIA is an improvement process which helps to determine whether our policies, practices, or new proposals will impact on, or affect different groups or communities. It enables officers to assess whether the impacts are positive, negative or unlikely to have a significant impact on each of the protected characteristic groups.

The tool has been updated to reflect the new public sector equality duty (PSED). The Duty highlights three areas in which public bodies must show compliance. It states that a public authority must, in the exercise of its functions, have due regard to the need to:

- 1. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;**
- 2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;**
- 3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.**

Whilst working on your Equality Impact Assessment, you must analyse your proposal against the three tenets of the Equality Duty.

General points

1. In the case of matters such as service closures or reductions, considerable thought will need to be given to any potential equality impacts. Case law has 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, it should demonstrably inform the decision, and be made available when the decision is recommended.
2. Wherever appropriate, the outcome of the EIA should be summarised in the Cabinet/Cabinet Member report 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.
5. If you already know that your decision is likely to be of high relevance to equality and/or be of high public interest, you should contact the Equality Officer for support.
6. Further advice and guidance can be accessed from the separate guidance document (link), as well as from the Opportunities Manager: PEIA@lbhf.gov.uk or ext 3430

LBHF Equality Impact Analysis Tool - Proposed Council Housing Tenancy Agreement

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2014/15 Quarter 1
Name and details of policy, strategy, function, project, activity, or programme	<p>Title of EIA: Proposed Housing Estates Improvement Programme (HEIP) for Emlyn Gardens, Sullivan Court, and Becklow Gardens</p> <p>This is an investment project for three housing estates in the borough which, if approved by Cabinet, will be delivered in the 2014/15 financial year. The proposed works to each estate relate to hard and soft landscaping and improvements to existing facilities. The aim of the proposed HEIP works is to harmonise the estates more successfully with the surrounding area and to improve security and allow better access to estate amenities.</p> <p>The policy framework for the Housing Estates Investment Programme was agreed by Cabinet on 18 April 2011. It was agreed that officers should consult with residents on the basis of this policy framework. The proposed works to the three estates represents the second phase of the HEIP.</p> <p>Below is a list of the proposed works for each estate:</p> <p>Emlyn Gardens</p> <ul style="list-style-type: none"> • Reinstating 'kick about' play area • Relocating and refurbishing existing play equipment • Refurbishments to boundary wall • Tree surgery and pruning • Replacing estate lighting columns • New landscaping • Replacing gallow gates • Refurbishing railing to ground floor flats • Repainting white and yellow parking lines • Installing recycling bin stores <p>Sullivan Court</p> <ul style="list-style-type: none"> • Renewing the younger children's play area. • Removing a ball court • New landscaping

	<ul style="list-style-type: none"> • Improvements to front and rear of shops • Tree surgery and pruning • Reinstating benches • Removal of bollards in parking area • Improving and renewing lighting • Replacing gallow gates • Repainting existing bin stores, fascia to garages and sheds where necessary • Resurfacing of car parking areas where bollards have been removed and where pot holes need to be filled. • Installing recycling bin screening <p>Becklow Gardens</p> <ul style="list-style-type: none"> • Tree surgery and pruning • Replacing estate lighting columns • New landscaping • Replacing gallow gates • Replacing fencing to lawned area • Repainting white and yellow parking lines • Installing recycling bin stores • Repairing and deep cleaning paved areas • Repainting perimeter railing • Refurbishing railing to ground floor flats • Repairing brick piers • Repainting bin store and shed doors • Repainting CCTV camera posts <p>Note: If your proposed strategy will require you to assess impact on staff, please consult your HR Relationship Manager. NOT APPLICABLE</p>
Lead Officer	Name: Mark Brayford Position: Head of Client Management Email: mark.brayford@lbhf.gov.uk Telephone No: 0208 753 4159
Date of completion of final EIA	05/11/2013

Section 02	Scoping of Full EIA						
Plan for completion	<p>Timing: The EIA on the Housing Estate Improvement Plan (HEIP) for the three estates is set out below. Approval to this plan is anticipated to be granted by Cabinet on 6 January 2014.</p> <p>Lead Officer: Mark Brayford</p>						
Analyse the impact of the policy, strategy, function, project, activity, or programme	<p>Analyse the impact of the policy on the protected characteristics (including where people / groups may appear in more than one protected characteristic). You should use this to determine whether the policy will have a positive, neutral or negative impact on equality, giving due regard to relevance and proportionality.</p> <p>This HEIP is designed to improve the physical environment of Emlyn Gardens, Sullivan Court and Becklow Gardens. The proposed works will improve the quality, safety and sustainability of these housing estates and at the same time support the council's aims of integrating council housing estates with the neighbouring streets and communities. The HEIP for these estates is based on consultation with local residents and key stakeholders.</p> <p>Unless otherwise specified, the comments against each protected characteristic refer to all three estates. Where separate consideration of impact on protected characteristics is necessary this is clearly titled.</p> <p>Diversity data does not exist down to estate level, so the figures that are quoted represent the smallest output area from the 2011 Census.</p> <table border="1" data-bbox="497 944 2132 1388"> <tr> <td data-bbox="497 944 757 1388">Age</td> <td data-bbox="757 944 1850 1388"> <p>Many children and young people as well as elderly residents live on Council estates and would therefore be expected to directly benefit from the proposed changes.</p> <p>Medium impact positive benefits can be expected for all residents. Public realm improvements such as paving and lighting will improve their local environment, increase natural surveillance and reduce the fear of crime. This may be particularly applicable to Becklow Gardens where 10.5% of the residents on the estate are over the age of 65 and who rely more on local facilities. This is a slightly higher proportion of the local population in comparison to the borough average of 9%.</p> </td> <td data-bbox="1850 944 1966 1388">H</td> <td data-bbox="1966 944 2132 1388">+</td> </tr> </table>			Age	<p>Many children and young people as well as elderly residents live on Council estates and would therefore be expected to directly benefit from the proposed changes.</p> <p>Medium impact positive benefits can be expected for all residents. Public realm improvements such as paving and lighting will improve their local environment, increase natural surveillance and reduce the fear of crime. This may be particularly applicable to Becklow Gardens where 10.5% of the residents on the estate are over the age of 65 and who rely more on local facilities. This is a slightly higher proportion of the local population in comparison to the borough average of 9%.</p>	H	+
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		<p>Emlyn Gardens 25.3% of the residents on the Emlyn Gardens estate are under the age of 16. This is a high proportion of the local population when compared to the borough average of 16.2%. Improvements to play equipment and facilities for young people would provide opportunities for more positive engagement.</p> <p>Sullivan Court 19.3% of the residents on the Sullivan Court estate are under the age of 16. This is a higher proportion of the local population in comparison to the borough average of 16.2%. Improvements to play equipment and facilities for young people would provide opportunities for more positive engagement. The removal of the ball court may discourage ASB and also enable the provision of play facilities that younger children could benefit from</p> <p>Becklow Gardens As above</p>		
	Disability	<p>People with disabilities and physical or mental ill health are disproportionately represented in Council housing in comparison to the rest of the borough. 14.6% of the population of Emlyn Gardens are registered with some form of disability, 16.2% on Sullivan Court, and 20.5% on Becklow Gardens. These compare to a borough average of 12.6%.</p> <p>Disabled residents can be expected to benefit directly from the investment plan through improved public realm such as improved accessibility and improved security through natural surveillance. Improvements to estate lighting can also be expected to benefit vulnerable residents who live on the estate by providing a safer neighbourhood.</p> <p>Emlyn Gardens The HEIP proposal for this estate includes the repainting of white lines on estate roads. This could help to reinforce disabled parking provision on the estate, therefore benefiting car owners who have a registered physical disability. Consideration for children with disabilities has been undertaken.</p>	M	+

		<p>Access to play areas will be DDA compliant for wheel chair users. Supplementary Planning Guidance requirements will be followed and additional equipment for disabled play will be identified.</p> <p>Sullivan Court Improvements to play equipment and facilities for young people would provide opportunities for more positive engagement. Consideration for children with disabilities has been undertaken. Access to play areas will be DDA compliant for wheel chair users. Supplementary Planning Guidance requirements will be followed and additional equipment for disabled play will be identified.</p> <p>Becklow Gardens The HEIP proposal for this estate includes the repainting of white lines on estate roads. This could help to reinforce disabled parking provision on the estate, therefore benefiting car owners who have a registered physical disability.</p>		
	Gender reassignment	There is limited data in relation to Council tenants or members of their household who have undergone gender re-assignment. That said, the effects of the HEIP are expected to be neutral in terms of this characteristic.	L	Neutral / +
	Marriage and Civil Partnership	There is limited data in relation to the marital status of Council tenants or members of their households. That said, the effects of the HEIP are expected to be neutral in terms of this characteristic.	L	Neutral / +
	Pregnancy and maternity	There is limited data in relation to the number of Council tenants or members of their households who are either pregnant or on maternity leave. That said, the effects of the HEIP are expected to be neutral in terms of this characteristic.	L	Neutral / +
	Race	The effects of the HEIP are, however, expected to be neutral in terms of this characteristic.	L	Neutral / +

Religion/belief (including non-belief)	The effects of the HEIP are expected to be neutral in terms of this characteristic.	L	Neutral / +
Gender	The effects of the HEIP are expected to be neutral in terms of this characteristic.	L	Neutral / +
Sexual Orientation	The Council has limited data on the breakdown of its tenants and their household members by sexual orientation. That said, the effects of this Investment Plan are expected to be neutral in terms of this characteristic.	L	Neutral / +

Human Rights or Children’s Rights

If your decision has the potential to affect Human Rights or Children’s Rights, please contact your Borough Lead for advice

Will it affect Human Rights, as defined by the Human Rights Act 1998?

Yes. Article 6: Right to a fair trial (to have your views heard), Article 8 (Right to respect for your family, home and correspondence), article 14 (Right to freedom from discrimination in respect of these rights and freedoms), Article 1 of Protocol 1 (Right to peaceful enjoyment of your property). It is considered that these would be positively impacted by the proposed policy.

Will it affect Children’s Rights, as defined by the UNCRC (1992)?

Yes. The right to life, survival, and development, and the right to have their views respected and to have their best interests considered at all times. It is considered that these would be positively impacted by the HEIP.

Section 03	<p>Analysis of relevant data Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.</p>
Documents and data reviewed	<p><u>LOCAL DEMOGRAPHICS OF EQUALITY TARGET GROUPS</u></p> <p>The following summary of the demographic situation in relation to each of the equality groups is based on the 2011 Census. This provides a starting point for the analysis of likely impacts of the PDCS on these groups.</p> <p>Population</p> <p>The borough population was measured at 182,493 at the time of the 2011 Census making Hammersmith & Fulham.</p> <p>The population of the borough is relatively young and ethnically diverse. It is also a highly mobile population with about half of all households having moved in the previous five years.</p> <p>The population density on the three estates is also significantly higher than the borough average of 111.3 people per hectare. On Emlyn Gardens it is 313.7 people per hectare, on Sullivan Court it is 159 people per hectare and at Becklow Gardens it is 254.1 people per hectare.</p> <p>Age</p> <p>In 2011, 74.8% of the population is between 16 and 64 years old which is significantly higher than the London (69.1%) and the country (64.7%) averages (Source: ONS, 2011). This higher than average working age population is not reflected on any of the three estates where the HEIP works are proposed. On Emlyn Gardens 68.5% of residents are between 16 and 64 years old. On Sullivan Court it is 71.8% and at Becklow Gardens it is 67.5%. In all three cases it is the percentage of under 16s that is higher than the borough average (Emlyn Gardens, 25.3%; Sullivan Court, 19.3%;, Becklow Gardens, 22%).</p> <p>Disability</p> <p>The rate of physical disability registrations for Hammersmith and Fulham as a whole is 12.6% of the population. We recognise that people with disabilities and those that support them may be represented in one or more of the other equality groups.</p> <p>On the three estates where HEIP works are proposed the percentage of those with a registered disability is higher than the percentage borough. 14.6% of the population of Emlyn Gardens are registered with some form of disability, 16.2% on Sullivan Court, and 20.5% on Becklow Gardens. These compare to a borough average of 12.6%.</p>

	<p>Race According to the 2011 Census, the main ethnicity in the borough was ‘white people’ (67.5%) followed by people from ‘black African’ origin (5.8%). The ‘white people’ category includes the categories of white British, white Irish, white gypsy or Irish traveller and white other.</p> <p>It has been noted that all three of the estates where HEIP works are proposed have a significantly higher percentage of Black, Minority, and Ethnicity (BME) residents than the borough average of 55.1%. On Emlyn Gardens 75.8% of the population are from BME backgrounds. On Sullivan Court 58.9% of the population are from BME backgrounds. On Becklow Gardens 89.7% of the population are from BME backgrounds.</p> <p>Religion According to the 2011 Census, 54.1% of residents in the borough are Christian, followed by 10% being Muslim, and 23.8% of the population not having any religious beliefs. The religious profiles for all three estates broadly follow the borough results, although all three estates have higher levels of the population who are practising Muslims.</p> <p>Sexual Orientation (and transgender) There is limited data in relation to Council tenants or members of their household who have undergone gender re-assignment.</p> <p>Gender and Sexual Orientation According to the 2011 Census, 51.3% of the borough population were female and 48.7% were male. The proportion of females to males across the three estates is broadly similar to the borough results (Emlyn Gardens, 56.5% females and 43.5% male; Sullivan Court 52.2% females and 47.8% male; and Becklow Gardens 52.1% female and 47.9% male).</p>
New research	<p>If new research is required, please complete this section N/A</p>

Section 04	Consultation
Consultation	<p>Details of consultation findings (if consultation is required. If not, please move to section 06)</p> <p>Emlyn Gardens</p> <p>A three stage consultation process took place on the Emlyn Gardens estate.</p> <p><u>Stage 1</u> - A drop-in session took place on 14 August 2013 at the Emlyn Gardens Community Centre which all residents were invited to attend. Invitations to this consultation session were sent out by post. A list of priority areas was developed based on the feedback that was received. The main issues that were identified from the consultation can be summarised as a lack of space for older children, overgrown hedges and trees, poor lighting, and poorly defined parking areas particularly around the community centre. A brief was given to Aecom, the landscape architects, who then developed a series of design options.</p> <p><u>Stage 2</u> – An exhibition of design options took place on 24 September 2013 where all residents from the estate were invited to view the proposals and provide further feedback for consideration. Residents were invited by post and by displaying posters around the estate in advance of the event. Feedback forms from the event were analysed after the event and further developments to the plans took place. As part of this process the resident association for the area was also asked to confirm what their priorities for the area were.</p> <p><u>Stage 3</u> – Residents in neighbouring street properties were consulted by post on 24 October 2013 on the proposed plans for the Emlyn Gardens estate and their feedback was reviewed and incorporated into the final HEIP proposals. One area that was important with the Emlyn Gardens HEIP proposal was to consider how noise disturbance from the play area could be mitigated for residents who live in the streets that surround Emlyn Gardens. This is one of the reasons why it is proposed that the play equipment is located to a different part of the estate.</p> <p>Sullivan Court</p> <p>A two stage consultation process took place on the Sullivan Court estate.</p> <p><u>Stage 1</u> –</p> <p>A drop-in session took place on 15 August 2013 again at the Sullivan Court Caretaker’s office which all residents were invited to attend. Invitations to this consultation session were sent out by post. A list of priority areas was developed based on the feedback that was received. The main issues that were identified from the consultation can</p>

be summarised as overgrown trees, problems with parking demarcation and gates, a lack of community space for meetings, the play area for smaller children is in need of improvement, the sunken garden needs improvement, there is currently unsatisfactory recycling provision, the future of the currently locked play area, the run down appearance of shops on the estate. A brief was given to Aecom, the landscape architects, who then developed a series of design options.

Stage 2 – An exhibition of design options took place on 7 October 2013 where all residents from the estate were invited to view the proposals and provide further feedback for consideration. Residents were invited by post and by displaying posters around the estate in advance of the event. Feedback forms from the event were analysed after the event and further developments to the plans took place. As part of this process the resident association for the area was also asked to confirm what their priorities for the area were.

Becklow Gardens

A two stage consultation process took place on the Becklow Gardens estate.

Stage 1 - A drop-in session then took place on 14 August at the Victoria Community Centre which all residents of the Becklow Gardens estate were invited to attend. Invitations to this consultation session were sent out by post. A list of priority areas was developed based on the feedback that was received. The main issues that were identified from consultation can be summarised as overgrown hedges and trees causing a nuisance to residents and hampering CCTV recording, block paviers that are in need of some repairs and a deep clean, and an isolated garden in the middle of the estate that currently looks uninviting. A brief was given to Aecom, the landscape architects, who then developed a series of design options.

Stage 2 – An exhibition of design options took place on 25 September 2013 where all residents from the estate were invited to view the proposals and provide further feedback for consideration. Residents were invited by post and by displaying posters around the estate in advance of the event. Feedback forms from the event were analysed after the event and further developments to the plans took place. As part of this process the resident association for the area was also asked to confirm what their priorities for the area were.

Key Council departments responsible for parking, housing development, planning, environment, safety and highways were also involved in developing the draft investment proposals.

Analysis of consultation outcomes

Summary of Consultation Responses

The consultation confirmed that the proposed HEIP would help to address the key physical and social issues affecting the residents for the three estates.

Emlyn Gardens

9 residents attended the consultation meeting on 24 September and, in terms of play area options, residents were either neutral or in favour of the proposed option. Residents were broadly positive about improvements to lawned areas, tree surgery and, addressing the unsightly bins.

Sullivan Court

12 residents completed feedback forms at the consultation meeting on 7 October 2013 and residents were positive about all proposals, with the majority of those attending in favour of closing the ball court, including the chair of the Resident Association. Facilities in the bin/recycling store was a high priority and improvements to the shops was a popular part of the proposal.

Becklow Gardens

29 residents attended the consultation meeting and were generally in favour of the environmental proposals, especially the pruning of trees to aid safety and facilitate the CCTV.

Section 05

Analysis of impact and outcomes


Analysis

What has your consultation (if undertaken) and analysis of data shown? You will need to make an informed assessment about the actual or likely impact that the policy, proposal or service will have on each of the protected characteristic groups by using the information you have gathered. The weight given to each protected characteristic should be proportionate to the relevant policy (see guidance).

This has been covered in both the analysis of consultation results and in the nine protected characteristics. The analysis that has been undertaken does not indicate lawful or unlawful discrimination.

Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	<p>Include any specific actions you have identified that will remove or mitigate the risk of adverse impacts and / or unlawful discrimination. This should provide the outcome for LBHF, and the overall outcome.</p> <p>No actions have been identified as a result of this EIA</p>

Section 07	Action Plan												
Action Plan	<p>Note: You will only need to use this section if you have identified actions as a result of your analysis</p> <p>No actions have been identified as a result of this EIA</p> <table border="1" data-bbox="488 778 2130 895"> <thead> <tr> <th>Issue identified</th> <th>Action (s) to be taken</th> <th>When</th> <th>Lead officer and borough</th> <th>Expected outcome</th> <th>Date added to business/service plan</th> </tr> </thead> <tbody> <tr> <td colspan="6" style="background-color: black; height: 50px;"></td> </tr> </tbody> </table>	Issue identified	Action (s) to be taken	When	Lead officer and borough	Expected outcome	Date added to business/service plan						
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Section 08	Agreement, publication and monitoring
Chief Officers' sign-off	 <p>Name: Jo Rowlands Position: Director Housing Services</p>

	Email: jo.rowlands @lbhf.gov.uk Telephone No: 0208 753 1313
Key Decision Report (if relevant)	Date of report to Cabinet/Cabinet Member: 06/01/2014 Key equalities issues have been included: Yes/No
Opportunities Manager (where involved)	Name: Carly Fry Position: Opportunities Manager Date advice / guidance given: 24/10/12 & 16/11/12 Email: carly.fry@lbhg.gov.uk Telephone No: 0208 753 3430