

Equalities Impact Assessment (EqIA)

EqIAs make services better for everyone and support value for money by getting services right first time.

EqIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then create an action plan to get the best outcomes for service users and staff¹. They analyse how all our work as a council might impact differently on different groups protected from discrimination by the Equality Act 2010². They help us make good decisions and evidence how we have reached them.³

An EqIA needs to be started as a project starts to identify and consider possible differential impacts on people and their lives, inform project planning and, where appropriate, identify mitigating actions. A full EqIA must be completed before any decisions are made or policy agreed so that the EqIA informs that decision or policy. It is also a live document; you should review and update it along with your project plan throughout.

You should first consider whether you need to complete this full EqIA⁴.

Other key points to note:

- Full guidance notes to help you are embedded in this form – see the End Notes or hover the mouse over the numbered notes.
- Please share your EqIA with your Equalities Champion and the final/updated version at the end of the project.
- Major EqIAs should be reviewed by the relevant Head of Service.
- Examples of completed EqIAs can be found on the Equalities Hub

1. Responsibility for the EqIA

Title of proposal ⁵	Tenancy Strategy Review
Name and job title of completing officer	Rachel Khan, Consultant, Campbell Tickell Laura Giles, Head of Strategy and Compliance (The Barnet Group)
Head of service area responsible	Susan Curran, Head of Housing and Regeneration
Equalities Champion supporting the EqIA	Rosie Evangelou, Consultation and Engagement Manager
Performance Management rep	n/a
HR rep (for employment related issues)	n/a
Representative (s) from external stakeholders	n/a

2. Description of proposal

Is this a: (Please tick all that apply)	
New policy /strategy / function / procedure / service <input type="checkbox"/>	Review of Policy /strategy / function / procedure / service <input checked="" type="checkbox"/>
Budget Saving <input type="checkbox"/>	Other <input type="checkbox"/>
If budget saving, please specify value below:	If other, please specify below:
<p>The proposal being assessed is the review of the council's Tenancy Strategy. Under the terms of the Localism Act 2011, councils in England must prepare and publish a 5-year strategy setting out the matters to which the registered providers of social housing for its district, including the local housing authority itself, are to regard in formulating policies relating to:</p>	

- the types of tenancies they will grant;
- the circumstances under which different types of tenancies will be granted;
- where they elect to grant fixed-term tenancies, the length of the fixed term; and
- the circumstances in which they will grant a further tenancy when the fixed term expires.

In deciding the types of tenancies to grant, the council must consider the:

- purpose of the accommodation;
- needs of individual households;
- legislation around the granting of tenancies;
- sustainability of the community; and
- efficient use of housing stock.

From April 2012, the council began to offer the majority of new tenants a 12-month introductory tenancy followed by a two or five-year fixed-term tenancy. The council established new priorities following the May 2022 local elections, including a commitment to move away from 2- and 5-year flexible tenancies (“flexible tenancies”) and reintroduce secure periodic tenancies for all council tenants.

The Tenancy Strategy has been revised to offer secure periodic tenancies to council tenancies. Lifetime tenancies allow for cohesive and stable neighbourhoods where households can put down roots and become part of the community without the fear of having to move on. These will be preceded by a one-year introductory tenancy for new tenants who have not previously held a social tenancy in line with current good practice.

The draft Tenancy Strategy has also been updated to include the information legally required as set out in the Localism Act 2011, including setting a clear expectation of how Private Registered Providers in the borough will manage tenancies. Through the strategy, the council encourages Private Registered Providers to offer lifetime tenancies, and to charge social rents where possible.

3. Supporting evidence

What existing data informs your assessment of the impact of the proposal on protected groups of service users and/or staff?

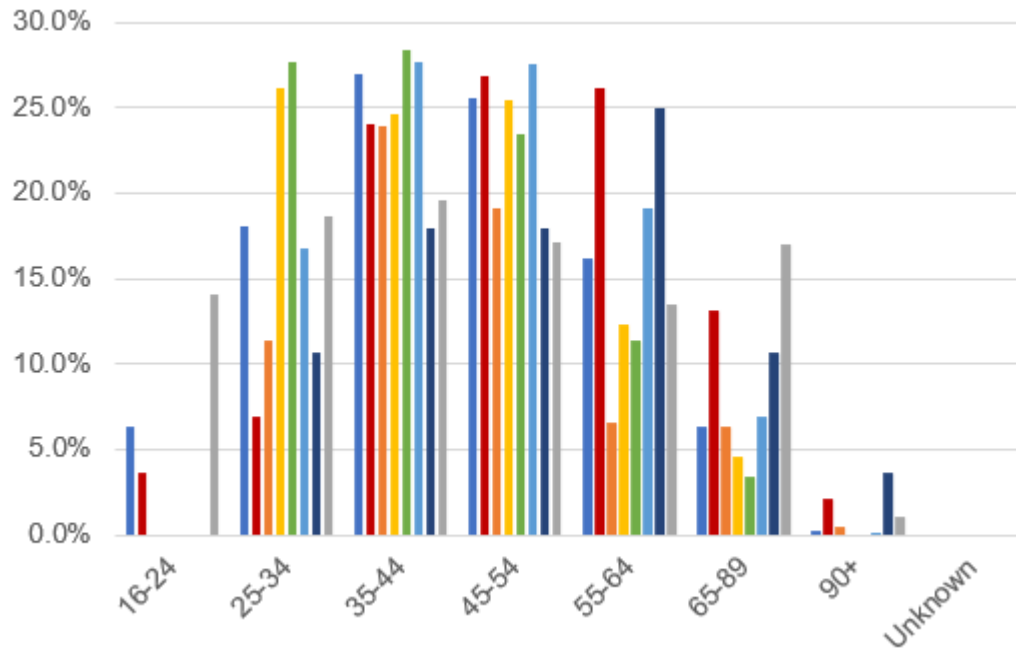
Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis

Protected group	<p>What does the data tell you⁶? <i>Provide a summary of any relevant demographic data about the borough's population from the <u>Joint Strategic Needs Assessment</u>, or data about the council's workforce</i></p>	<p>What do people tell you⁷? <i>Provide a summary of relevant consultation and engagement including surveys and other research with stakeholders, newspaper articles, correspondence etc.</i></p>
	<p>Applicants on the waiting list</p>	

Age⁸

The majority of the banded applicants on the waiting list are aged 25 to 64 and this is higher representation than is in the borough’s overall population. The majority of lettings are spread fairly evenly across bands with higher representation of those aged 35-44 and lower representation of those aged over 65. In the population of current tenants with introductory to flexible tenancies or flexible tenancies, there is higher representation of those aged 35-54. There is lower representation of those aged 65+, as would be expected given the outgoing strategy’s approach to issuing secure periodic tenancies to older people in receipt of state pension.

Profile of banded applicants:

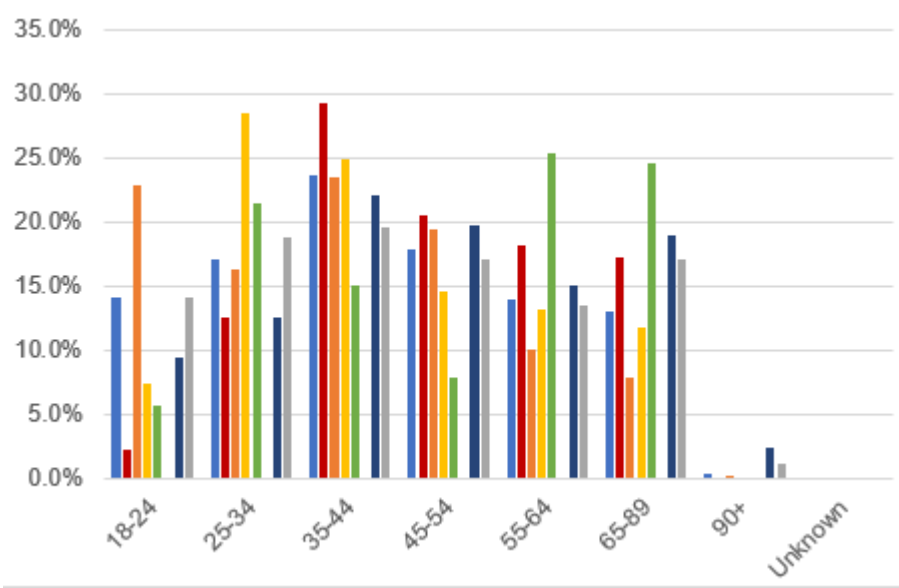


Consultation showed the majority of applicants mirrored the age demographic. Ages 18 – 34 were positive about the removal flexible tenancies and the continued used of introductory tenancies for new tenants. This was reflected in percentages of 90% and above.

Older residents were only slightly less positive, percentages of 7% or less in disagreement with the general aims of the strategy, continued use of introductory tenancies and stopping flexible tenancies.

- Banded Applicants Profile
- Band 1 Profile
- Band 2 Profile
- Band 3 Profile
- Band 4 Profile
- Band 4 (TA) Profile
- Direct Offer Profile
- Barnet Profile (Census 2021)

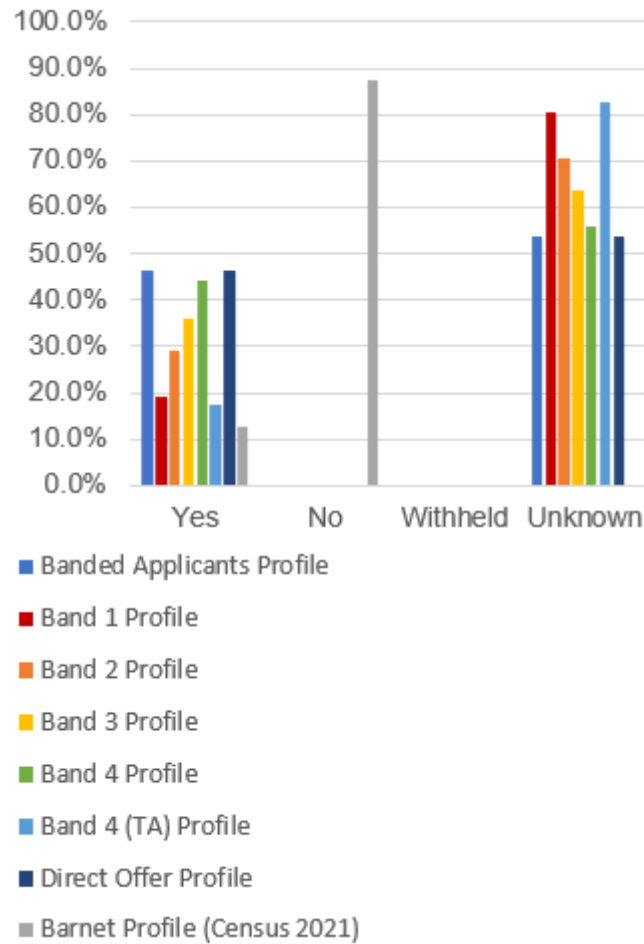
Profile of lettings (April 2021- March 2023):



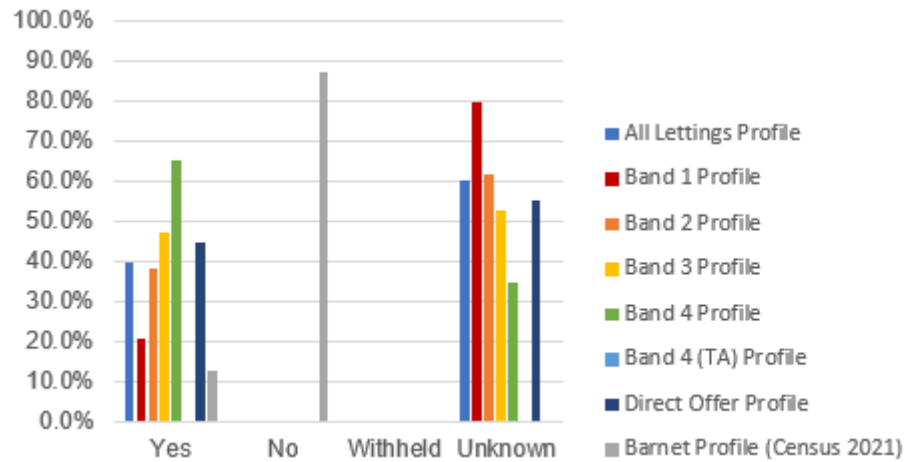
	<p> ■ All Lettings Profile ■ Band 1 Profile ■ Band 2 Profile ■ Band 3 Profile ■ Band 4 Profile ■ Band 4 (TA) Profile ■ Direct Offer Profile ■ Barnet Profile (Census 2021) </p> <p>Profile of existing council tenants with an introductory tenancy that will become a flexible/fixed term tenancy, and those with a flexible/fixed term tenancy:</p> <table border="1"> <caption>Estimated data from the bar chart</caption> <thead> <tr> <th>Age Group</th> <th>All Lettings Profile (%)</th> </tr> </thead> <tbody> <tr> <td>18-24</td> <td>11.5</td> </tr> <tr> <td>25-34</td> <td>16.0</td> </tr> <tr> <td>35-44</td> <td>25.5</td> </tr> <tr> <td>45-54</td> <td>27.0</td> </tr> <tr> <td>55-64</td> <td>14.0</td> </tr> <tr> <td>65-89</td> <td>4.0</td> </tr> <tr> <td>90+</td> <td>0.5</td> </tr> <tr> <td>Unknown/Anon</td> <td>0.5</td> </tr> </tbody> </table>	Age Group	All Lettings Profile (%)	18-24	11.5	25-34	16.0	35-44	25.5	45-54	27.0	55-64	14.0	65-89	4.0	90+	0.5	Unknown/Anon	0.5	
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<p>Disability⁹</p>	<p>There is higher representation of banded applicants on the Housing Needs Register who are disabled compared to the borough's overall population.</p> <p>There is also higher representation of those with a disability amongst recent social housing lettings.</p> <p>In the population of current tenants with introductory to flexible tenancies or flexible tenancies, there is slightly lower representation of those who are disabled. This would</p>	<p>Around 24% of respondents indicated they had a disability and of these most either had a mental illness or a mobility impairment.</p>																		

be expected given the outgoing strategy's approach to issuing secure periodic tenancies to households including someone who is disabled.

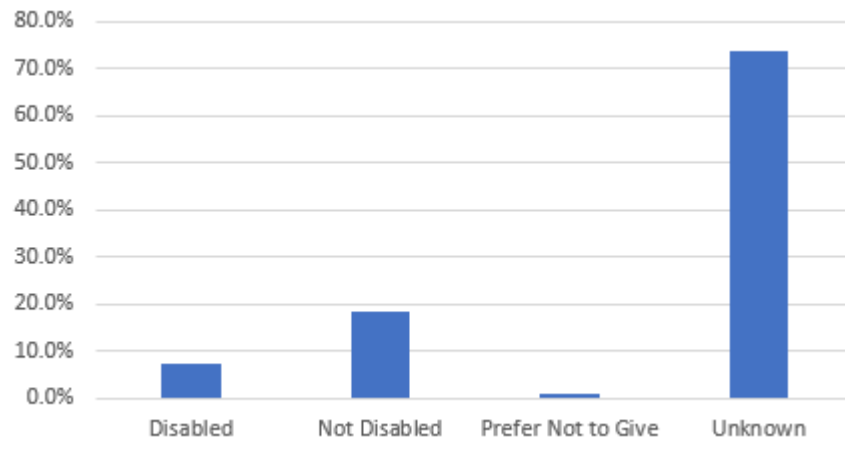
Profile of banded applicants:



Profile of lettings (April 2021- March 2023):



Profile of existing council tenants with an introductory tenancy that will become a flexible/fixed term tenancy, and those with a flexible/fixed term tenancy:

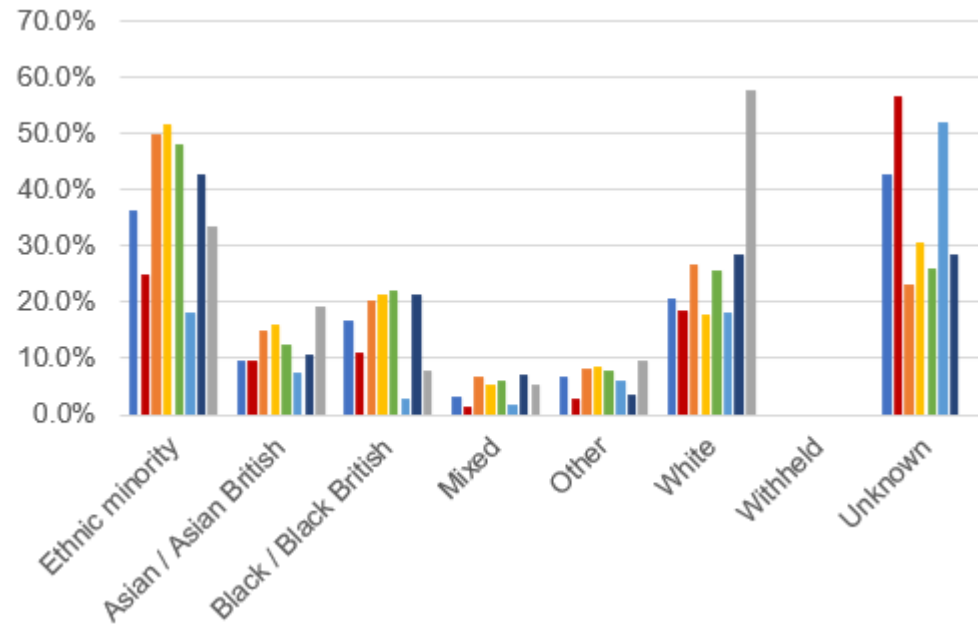


Gender reassignment¹⁰

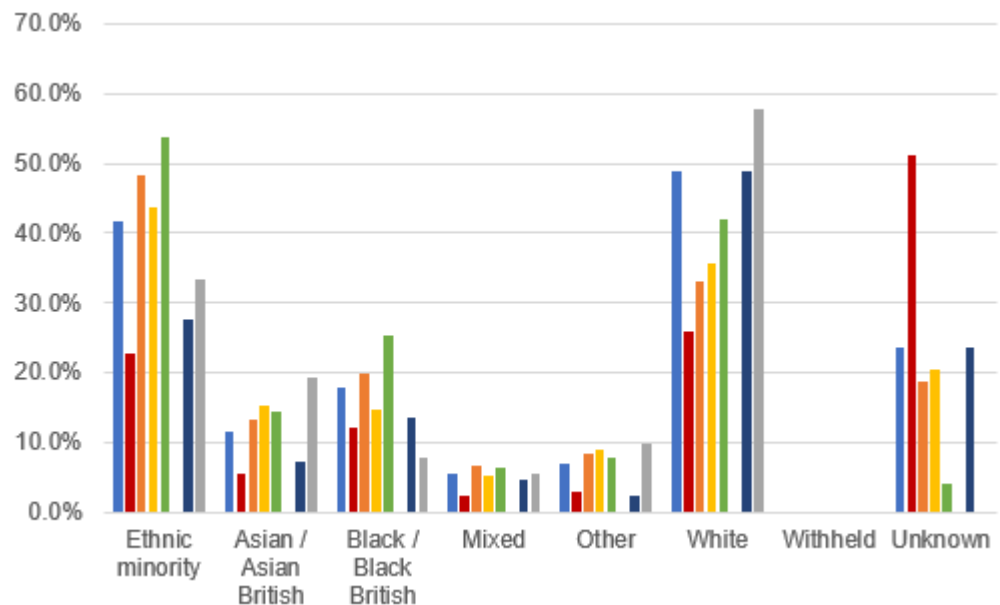
Information currently not captured.

Gender reassignment was not explicitly answered by the respondents. 5.3%

		preferred not to say and may reflect those who fall into this category. The granting of tenancies is blind to gender and without information it is difficult to understand the views of this cohort.
Marriage and Civil Partnership¹¹	Protected characteristic only relevant regarding employment matters	Information not collected during the consultation.
Pregnancy and Maternity¹²	Information currently not captured	Information not collected during the consultation.
Race/ Ethnicity¹³	<p>There is higher representation of banded applicants on the Housing Needs Register who are from a Black / Black British background compared to the borough's overall population.</p> <p>There is also higher representation of those who are from a Black / Black British background amongst recent social housing lettings.</p> <p>In the population of current tenants with introductory to flexible tenancies or flexible tenancies, there is higher representation of those who are from a Black / Black British background.</p> <p>Profile of banded applicants:</p>	<p>Just over 35 respondents to the consultation were white, then fewer for black/African, white other, prefer not to say and Asian in that order.</p> <p>There was overwhelming support of the new strategy across nearly all 10 questions, especially the ones relating to the granting of lifetime tenancies and stopping flexible tenancies.</p>

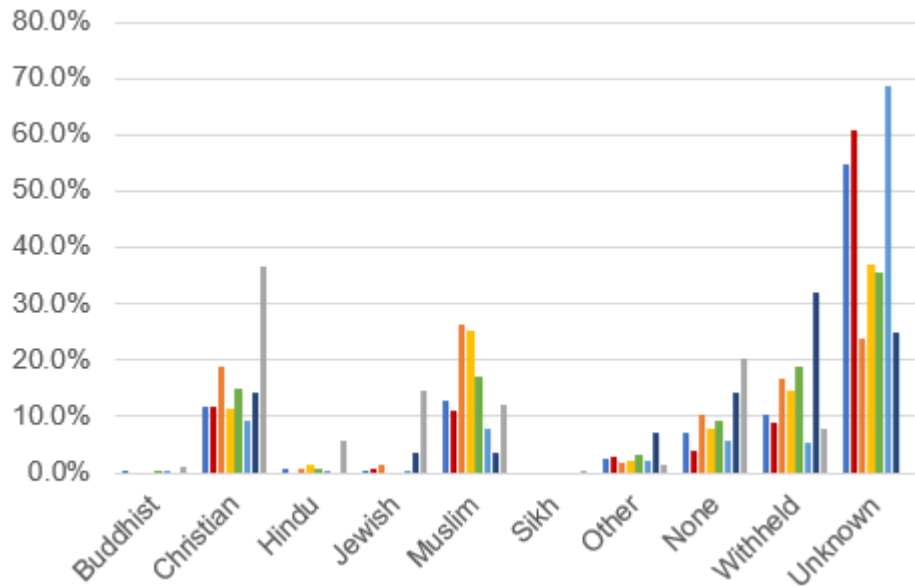


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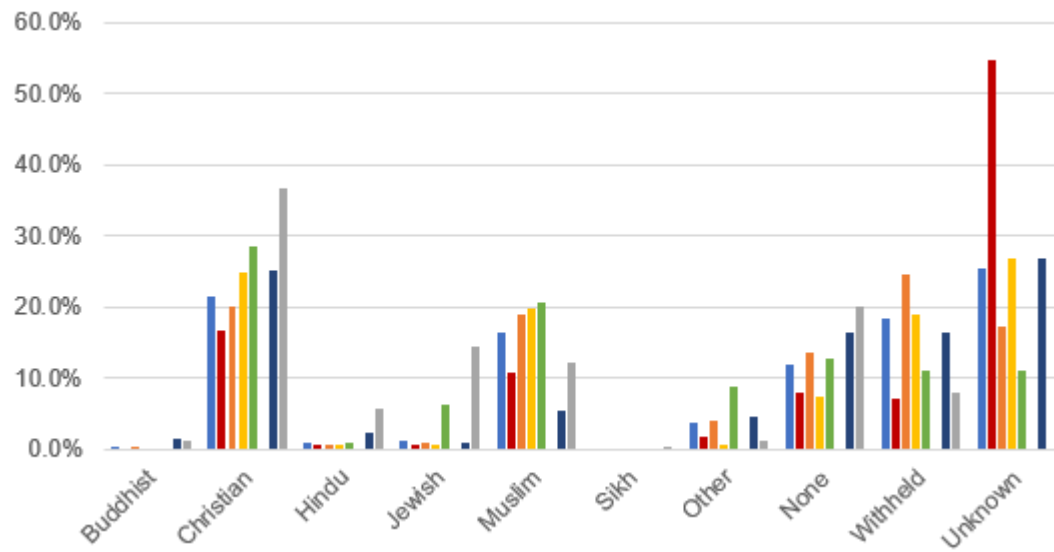


Profile of existing council tenants with an introductory tenancy that will become a flexible/fixed term tenancy, and those with a flexible/fixed term tenancy:

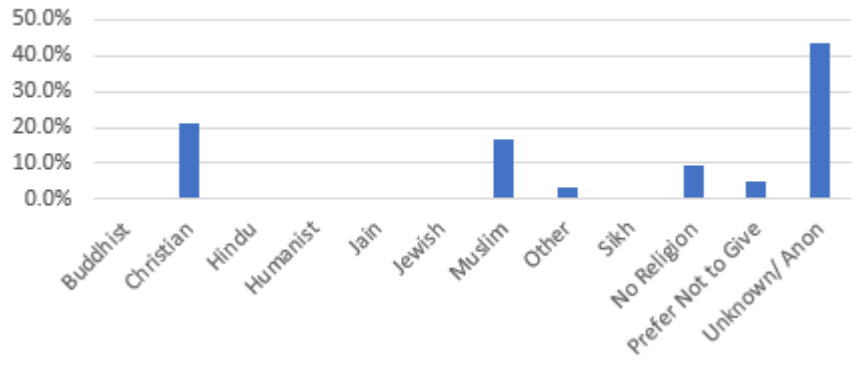
	<table border="1"> <thead> <tr> <th>Ethnicity</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Asian or Asian British</td> <td>11.5%</td> </tr> <tr> <td>Black or Black British</td> <td>20.0%</td> </tr> <tr> <td>Mixed</td> <td>2.5%</td> </tr> <tr> <td>White</td> <td>25.5%</td> </tr> <tr> <td>Other</td> <td>7.5%</td> </tr> <tr> <td>Prefer Not to Give</td> <td>0.5%</td> </tr> <tr> <td>Unknown/Anon</td> <td>32.0%</td> </tr> </tbody> </table>	Ethnicity	Percentage	Asian or Asian British	11.5%	Black or Black British	20.0%	Mixed	2.5%	White	25.5%	Other	7.5%	Prefer Not to Give	0.5%	Unknown/Anon	32.0%	
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Unknown/Anon	32.0%																	
<p>Religion or belief¹⁴</p>	<p>There is slightly higher representation of those who are Muslim amongst recent social housing lettings.</p> <p>In the population of current tenants with introductory to flexible tenancies or flexible tenancies, there is slightly higher representation of those who are Muslim.</p> <p>Profile of banded applicants:</p>	<p>Around 50 respondents were Christian and nearly 30 were Muslim. The rest preferred not to say or had no religion for the most part. There was overall support for the strategy, its aims the tenancies it would allow social landlords to grant and the increased sustainment measures.</p>																

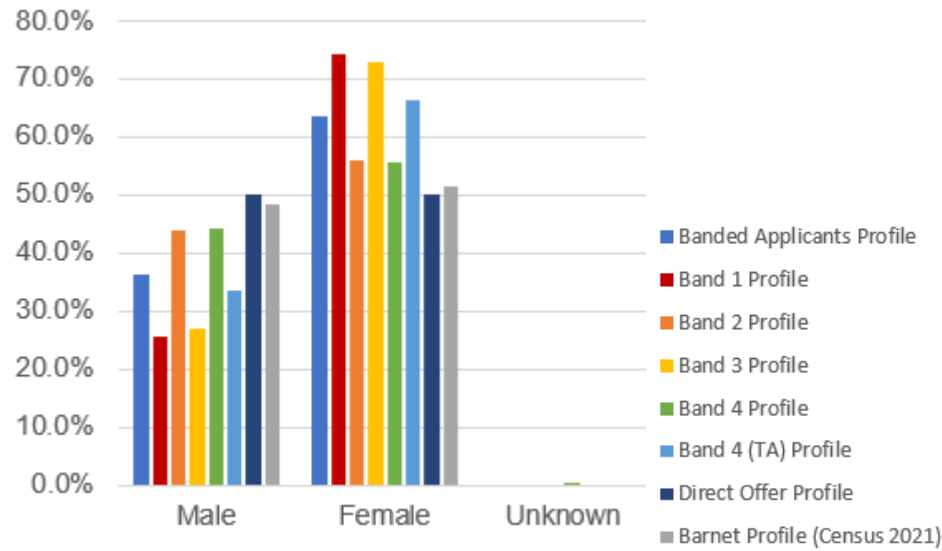


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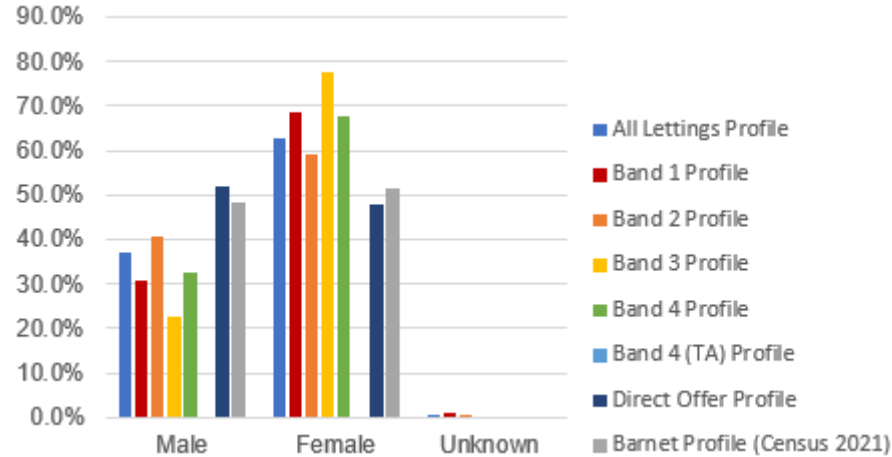


Profile of existing council tenants with an introductory tenancy that will become a flexible/fixed term tenancy, and those with a flexible/fixed term tenancy:

	 <table border="1"> <thead> <tr> <th>Religion</th> <th>Percentage</th> </tr> </thead> <tbody> <tr><td>Buddhist</td><td>0.0%</td></tr> <tr><td>Christian</td><td>20.0%</td></tr> <tr><td>Hindu</td><td>0.0%</td></tr> <tr><td>Humanist</td><td>0.0%</td></tr> <tr><td>Jain</td><td>0.0%</td></tr> <tr><td>Jewish</td><td>0.0%</td></tr> <tr><td>Muslim</td><td>15.0%</td></tr> <tr><td>Other</td><td>5.0%</td></tr> <tr><td>Sikh</td><td>0.0%</td></tr> <tr><td>No Religion</td><td>10.0%</td></tr> <tr><td>Prefer Not to Give</td><td>5.0%</td></tr> <tr><td>Unknown/ Anon</td><td>45.0%</td></tr> </tbody> </table>	Religion	Percentage	Buddhist	0.0%	Christian	20.0%	Hindu	0.0%	Humanist	0.0%	Jain	0.0%	Jewish	0.0%	Muslim	15.0%	Other	5.0%	Sikh	0.0%	No Religion	10.0%	Prefer Not to Give	5.0%	Unknown/ Anon	45.0%	
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Sex ¹⁵	<p>There is higher representation of banded applicants on the Housing Needs Register who are female compared to the borough's overall population.</p> <p>There is also higher representation of those who are female amongst recent social housing lettings.</p> <p>In the population of current tenants with introductory to flexible tenancies or flexible tenancies, there is higher representation of those who are female.</p> <p>Profile of banded applicants:</p>	<p>61% of respondents were female and 32% male with the rest non binary or preferring not to say.</p> <p>Support for the new tenancy strategy was in the high 80% across the majority of the 10 questions.</p>																										

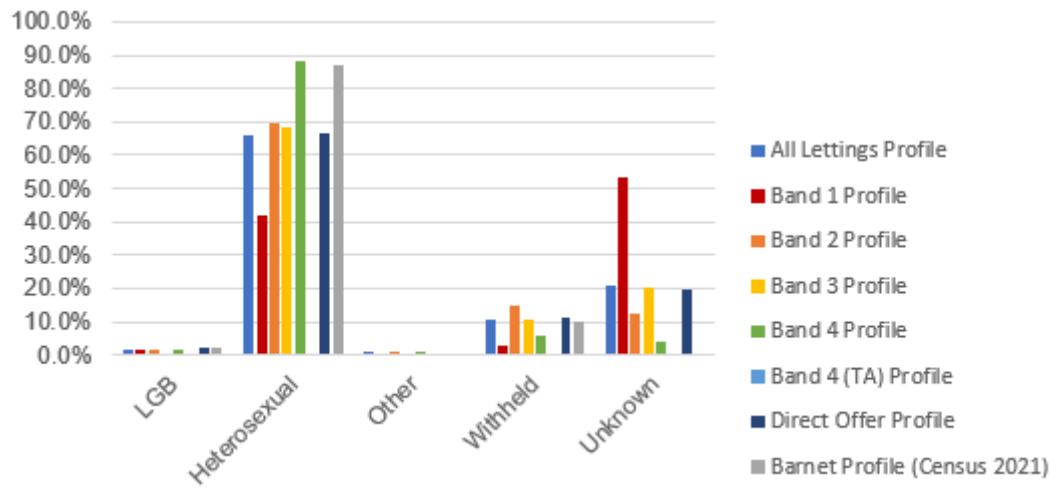


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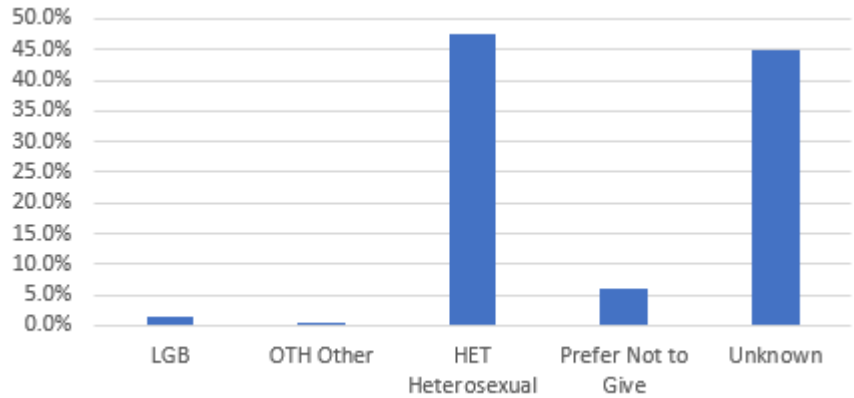


Profile of existing council tenants with an introductory tenancy that will become a flexible/fixed term tenancy, and those with a flexible/fixed term tenancy:

<p>Sexual Orientation¹⁶</p>	<p>Profile of banded applicants:</p> <p>Profile of lettings (April 2021- March 2023):</p>	<p>85% of respondents were heterosexual. With 14% LGB and the rest preferring not to say. There was huge support for the new strategy across these groups.</p>



Profile of existing council tenants with an introductory tenancy that will become a flexible/fixed term tenancy, and those with a flexible/fixed term tenancy:



Other relevant groups¹⁷

4. Assessing impact

What does the evidence tell you about the impact your proposal may have on groups with protected characteristics ¹⁸?

Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Is there an impact on service deliver? Is there an impact on customer satisfaction? Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact
			Minor	Major	
Age	<p>The majority of applicants and flexible tenants fall within the 25 to 64 age range. Applicants going into older person accommodation are not granted flexible tenancies currently and with the new strategy this will not change. As the distribution of age and lettings is broad, ceasing to grant flexible tenancies will affect all age groups evenly.</p> <p>For tenancy variations following approval of the strategy, the proposal is to allow those within 9 months of the end of the flexible tenancy to migrate to secure tenancies and those who have longer to go to vary their tenancy to a secure one. This will positively impact this age range.</p> <p>Overall, the strategy is expected to have a positive impact due to the change to secure periodic tenancies for all council tenants that is expected to allow for cohesive and stable neighbourhoods where households can put down roots and become part of the community without the fear of having to move on</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<p>For those who are disabled, the impact is positive as the flexible tenancy can be hard to understand and the review can at times cause stress.</p> <p>The outgoing Tenancy Strategy commits the council to issuing secure periodic tenancies to households with a member who is disabled, so the positive impact of the proposed changes are expected to be minimal. Nonetheless, we might expect that some applicants with mental ill health could fall outside the existing provisions, and therefore the changes proposed in the strategy will greatly assist this group. Flexible tenancies require the reviews and decisions based on conduct which does not always make it easy for those suffering with a mental illness to engage. The smoother harmonised approach to tenancy management proposed by the new tenancy strategy will remove</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p>this to some degree. Support for more vulnerable residents is a key aim of the new strategy with measures for tenancy sustainment outlined for all social landlords.</p> <p>Regarding tenancy migration, existing flexible tenants will be asked to vary their tenancy ahead of time to a lifetime one, regardless of disability. If they prefer not, it will remain as it is until the time lapses and they convert. There is no disadvantage. Flexible tenants will be walked through their rights and the process of variation which is not mandatory. Advocates and Support Workers will be invited in as necessary to assist the tenant through the variation process.</p> <p>The existence of a disability is not as well known as some of the other demographics in some cases and bands this rises to 80% for the higher bands. Only a small proportion of adapted units are let per year. The loss of flexible tenancies can only positively impact on people with a disability.</p> <p>Overall, the strategy is expected to have a positive impact due to the change to secure periodic tenancies for all council tenants that is expected to allow for cohesive and stable neighbourhoods where households can put down roots and become part of the community without the fear of having to move on</p>				
<p>Gender reassignment</p>	<p>There is no information held on gender reassignment, and it is not expected that there will be a specific impact in relation to the strategy.</p> <p>However, we may reasonably expect a broad positive impact on individuals who have this protected characteristic in line with the anticipated overall positive impact on all individuals affected by the strategy. This impact is not based on the protected characteristics, but the change to secure periodic tenancies for all council tenants is expected to allow for cohesive and stable neighbourhoods where households can put down roots and become part of the community without the fear of having to move on.</p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input checked="" type="checkbox"/></p>

<p>Marriage and Civil Partnership</p>	<p>There is no information held on gender reassignment, and it is not expected that there will be a specific impact in relation to the strategy.</p> <p>However, we may reasonably expect a broad positive impact on individuals who have this protected characteristic in line with the anticipated overall positive impact on all individuals affected by the strategy. This impact is not based on the protected characteristics, but the change to secure periodic tenancies for all council tenants is expected to allow for cohesive and stable neighbourhoods where households can put down roots and become part of the community without the fear of having to move on.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Pregnancy and Maternity</p>	<p>There is no information held on gender reassignment, and it is not expected that there will be a specific impact in relation to the policy.</p> <p>However, we may reasonably expect a broad positive impact on individuals who have this protected characteristic in line with the anticipated overall positive impact on all individuals affected by the strategy. This impact is not based on the protected characteristics, but the change to secure periodic tenancies for all council tenants is expected to allow for cohesive and stable neighbourhoods where households can put down roots and become part of the community without the fear of having to move on.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>Race/ Ethnicity</p>	<p>Due to high representation in the relevant affected populations, we expect those from a Black / Black British background to be particularly affected by the outcomes of the strategy.</p> <p>Overall, the strategy is expected to have a positive impact due to the change to secure periodic tenancies for all council tenants that is expected to allow for cohesive and stable neighbourhoods where households can put down roots and become part of the community without the fear of having to move on</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Religion or belief</p>	<p>Whilst the religious beliefs of the majority of applicants is unknown, there is high representation of those who are Muslim; this group is therefore expected to be particularly affected by the outcomes of the strategy due to prevalence in the population.</p> <p>Overall, the strategy is expected to have a positive impact due to the change to secure periodic tenancies for all council tenants that is expected to allow for cohesive and stable neighbourhoods where households can put down roots and become part of the community without the fear of having to move on</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

<p>Sex</p>	<p>Females are highly represented within the affected groups, and therefore are expected to be particularly affected by the outcomes of the strategy due to prevalence in the population. Women are generally more likely to have a higher housing need due to the increased likelihood that they will be within a single parent household.</p> <p>Overall, the strategy is expected to have a positive impact due to the change to secure periodic tenancies for all council tenants that is expected to allow for cohesive and stable neighbourhoods where households can put down roots and become part of the community without the fear of having to move on</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<p>Sexual Orientation</p>	<p>There is limited information held on sexual orientation, and it is not expected that there will be a specific impact in relation to the policy.</p> <p>However, we may reasonably expect a broad positive impact on individuals who have this protected characteristic in line with the anticipated overall positive impact on all individuals affected by the strategy. This impact is not based on the protected characteristics, but the change to secure periodic tenancies for all council tenants is expected to allow for cohesive and stable neighbourhoods where households can put down roots and become part of the community without the fear of having to move on.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

<p>5. Other key groups</p> <p>Are there any other vulnerable groups that might be affected by the proposal? <i>These could include carers, people in receipt of care, lone parents, people with low incomes or unemployed</i></p>	<p>Positive impact</p>	<p>Negative impact</p>		<p>No impact</p>
		<p>Minor</p>	<p>Major</p>	

Key groups	Families and lone parents, people with a low income, people not in employment, education, or training, carers, all may come into contact with housing services in Barnet and due to the nature of social housing are more likely to be highly represented within the affected populations.				
	We may reasonably expect a broad positive impact on these group in line with the overall positive impact on all protected characteristics.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Overall, the strategy is expected to have a positive impact due to the change to secure periodic tenancies for all council tenants that is expected to allow for cohesive and stable neighbourhoods where households can put down roots and become part of the community without the fear of having to move on				

6. Cumulative impact¹⁹

Considering what else is happening within the council and Barnet could your proposal contribute to a cumulative impact on groups with protected characteristics?

Yes No

If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below

7. Actions to mitigate or remove negative impact

Only complete this section if your proposals may have a negative impact on groups with protected characteristics. These need to be included in the relevant service plan for mainstreaming and performance management purposes.

Group affected	Potential negative impact	Mitigation measures ²⁰ <i>If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.</i>	Monitoring ²¹ <i>How will you assess whether these measures are successfully mitigating the impact?</i>	Deadline date	Lead Officer

8. Outcome of the Equalities Impact Assessment (EqIA)²²

Please select one of the following four outcomes

Proceed with no changes

The EqIA has not identified any potential for a disproportionate impact and all opportunities to advance equality of opportunity are being addressed

Proceed with adjustments

Adjustments are required to remove/mitigate negative impacts identified by the assessment

Negative impact but proceed anyway

This EqIA has identified negative impacts that are not possible to mitigate. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below

Do not proceed

This EqIA has identified negative impacts that cannot be mitigated, and it is not possible to continue. Outline the reasons for this and the information used to reach this decision in the space below

Reasons for decision

The Tenancy Strategy has been revised to focus on the priorities for the administration that were established in the Labour Group's local election manifesto in 2022. The significant change being implemented is for the council to cease to issue flexible / fixed term tenancies, and instead to issue secure periodic ("lifetime") tenancies to all those being housed in council-owned social housing. This will remain subject to a one-year introductory tenancy for the majority of applicants.

The overall impact of the Housing Strategy on the protected groups under the Equality Act 2010 is expected to be positive. The new strategy proposes lifetime tenancies after 12 months if all goes well and this will benefit all tenants as it is expected to allow for cohesive and stable neighbourhoods where households can put down roots and become part of the community without the fear of having to move on.

A wider positive impact is expected as the Tenancy Strategy also encourages registered providers operating within the borough to adopt a similar approach to issuing tenancies, in addition to encouraging tenancy sustainment activities to minimise tenancy loss.

Whilst the strategies are not targeted at the protected groups, some groups will be more likely to be affected due to their tendency to be eligible for and/or live in the social housing sector.

Sign-off

9. Sign off and approval by Head of Service / Strategic lead²³

Name Susan Curran	Job title Head of Housing and Regeneration
<input checked="" type="checkbox"/> Tick this box to indicate that you have approved this EqIA	Date of approval: 03/07//23
<input type="checkbox"/> Tick this box to indicate if EqIA has been published Date EqIA was published: Embed link to published EqIA:	Date of next review:

Footnotes: guidance for completing the EqIA template

¹ The following principles explain what we must do to fulfil our duties under the Equality Act when considering any new policy or change to services. They must all be met or the EqIA (and any decision based on it) may be open to challenge:

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately
- **Timeliness:** the duty applies at the time of considering proposals and before a final decision is taken
- **Real Consideration:** the duty must be an integral and rigorous part of your decision-making and must influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.
- **No delegation:** the council is responsible for ensuring that anyone who provides services on our behalf complies with the equality duty.
- **Review:** the equality duty is a continuing duty – it continues after proposals are implemented/reviewed.
- **Proper Record Keeping:** we must keep records of the process and the impacts identified.

² Our duties under the Equality Act 2010

The council has a legal duty under this Act to show that we have identified and considered the impact and potential impact of our activities on all people with ‘protected characteristics’ (see end notes 9-19 for details of the nine protected characteristics). This applies to policies, services (including commissioned services), and our employees.

We use this template to do this and evidence our consideration. You must give ‘due regard’ (pay conscious attention) to the need to:

- **Avoid, reduce or minimise negative impact:** if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately.
- **Promote equality of opportunity:** by
 - Removing or minimising disadvantages suffered by people with a protected characteristic
 - Taking steps to meet the needs of these groups
 - Encouraging people with protected characteristics to participate in public life or any other activity where participation is disproportionately low
 - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- **Foster good relations between people who share a protected characteristic and those who don’t:** e.g. by promoting understanding.

³ EqIAs should always be proportionate to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The size of the likely impact – e.g. the numbers of people affected and their vulnerability

The greater the potential adverse impact of the proposal on a protected group (e.g. disabled people) and the more vulnerable the group is, the more thorough and demanding the process required by the Act will be. Unless they contain sensitive data – EqIAs are public documents. They are published with Cabinet papers, Panel papers and public consultations. They are available on request.

⁴ When to complete an EqIA:

- When developing a new policy, strategy, or service
- When reviewing an existing service, policy or strategy

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- When making changes that will affect front-line services
 - When amending budgets which may affect front-line services
 - When changing the way services are funded and this may impact the quality of the service and who can access it
 - When making a decision that could have a different impact on different groups of people
 - When making staff redundant or changing their roles

Wherever possible, build the EqIA into your usual planning and review processes.

Also consider:

- Is the policy, decision or service likely to be relevant to any people because of their protected characteristics?
- How many people is it likely to affect?
- How significant are its impacts?
- Does it relate to an area where there are known inequalities?
- How vulnerable are the people who will be affected?

If there are potential impacts on people but you decide not to complete an EqIA you should document your reasons why.

⁵ **Title of EqIA:** This should clearly explain what service / policy / strategy / change you are assessing.

⁶ **Data & Information:** Your EqIA needs to be informed by data. You should consider the following:

- What data is relevant to the impact on protected groups is available? (is there an existing EqIA?, local service data, national data, community data, similar proposal in another local authority).
- What further evidence is needed and how can you get it? (e.g. further research or engagement with the affected groups).
- What do you know from service/local data about needs, access and outcomes? Focus on each characteristic in turn.
- What might any local demographic changes or trends mean for the service or function? Also consider national data if appropriate.
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any group(s)?
- Is the service having a positive or negative effect on particular people or groups in the community?

⁷ **What have people told you about the service, function, area?**

- Use service user feedback, complaints, audits
- Conduct specific consultation or engagement and use the results
- Are there patterns or differences in what people from different groups tell you?
- Remember, you must consult appropriately and in an inclusive way with those likely to be affected to fulfil the equality duty.
- You can read LBB [Consultation and Engagement toolkit](#) for full advice or contact the Consultation and Research Manager, rosie.evangelou@barnet.gov.uk for further advice

⁸ **Age:** People of all ages, but consider in particular children and young people, older people and carers, looked after children and young people leaving care. Also consider working age people.

⁹ **Disability:** When looking at disability, consideration should be given to people with different types of impairments: physical (including mobility), learning, aural or sensory (including hearing and vision impairment), visible and non-visible impairment. Consideration should also be given to: people with HIV, people with mental health needs and people with drug and alcohol problems. People with conditions such as diabetes and cancer and some other health conditions also have protection under the Equality Act 2010.

¹⁰ **Gender Reassignment:** In the Act, a transgender person is someone who proposes to, starts or has completed a process to change their gender. A person does not need to be under medical supervision to be protected. Consider transgender people, transsexual people and transvestites.

¹¹ **Marriage and Civil Partnership:** consider married people and civil partners.

¹² **Pregnancy and Maternity:** When looking at pregnancy and maternity, give consideration to pregnant women, breastfeeding mothers, part-time workers, women with caring responsibilities, women who are lone parents and parents on low incomes, women on maternity leave and 'keeping in touch' days.

¹³ **Race/Ethnicity:** Apart from the common ethnic groups, consideration should also be given to Traveller communities, people of other nationalities outside Britain who reside here, refugees and asylum seekers and speakers of other languages.

¹⁴ **Religion and Belief:** Religion includes any religion with a clear structure and belief system. As a minimum you should consider the most common religious groups (Christian, Muslim, Hindu, Jews, Sikh, Buddhist) and people with no religion or philosophical beliefs.

¹⁵ **Sex/Gender:** Consider girls and women, boys and men, married people, civil partners, part-time workers, carers (both of children with disabilities and older cares), parents (mothers and fathers), in particular lone parents and parents on low incomes.

¹⁶ **Sexual Orientation:** The Act protects bisexual, heterosexual, gay and lesbian people.

¹⁷ **Other relevant groups:** You should consider the impact on our service users in other related areas.

¹⁸ **Impact:** Your EqIA must consider fully and properly actual and potential impacts against each protected characteristic:

- The equality duty does not stop changes, but means we must fully consider and address the anticipated impacts on people.
- Be accurate and transparent, but also realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific where you can so decision-makers have a concrete sense of potential effects.
- Questions to ask when assessing whether and how the proposals impact on service users, staff and the wider community:
 - Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
 - Is there evidence of higher/lower uptake of a service among different groups? Which, and to what extent?
 - Does the project relate to an area with known inequalities (where national evidence or previous research is available)?
 - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
 - If there is negative differential impact, how can you minimise that while taking into account your overall aims?
- Do the effects amount to unlawful discrimination? If so the plan **must** be modified.
- Does it relate to an area where equality objectives have been set by LBB in our [Barnet 2024 Plan](#) and our [Strategic Equality Objective](#)?

¹⁹ **Cumulative Impact**

You will need to look at whether a single decision or series of decisions might have a greater negative impact on a specific group and at ways in which negative impacts across the council might be minimised or avoided.

²⁰ **Mitigating actions**

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- Consider mitigating actions that specifically address the impacts you've identified and show how they will remove, reduce or avoid any negative impacts
 - Explain clearly what any mitigating measures are, and the extent to which you think they will reduce or remove the adverse effect
 - Will you need to communicate or provide services in different ways for different groups in order to create a 'level playing field'?
 - State how you can maximise any positive impacts or advance equality of opportunity.
 - If you do not have sufficient equality information, state how you can fill the gaps.

²¹ **Monitoring:** The Equality Duty is an ongoing duty: policies must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further monitoring, equality assessment, and consultation are needed.

²² **Outcome:**

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Also explain what positive impacts will result from the actions and how you can make the most of these.
- Make it clear if a change is needed to the proposal itself. Is further engagement, research or monitoring needed?
- Make it clear if, as a result of the analysis, the policy/proposal should be stopped.

²³ **Sign off:** You will need to ensure the EqIA is signed off by your Head of Service, agree whether the EqIA will be published, and agree when the next review date for the EqIA will be.