

EQUALITY IMPACT ASSESSMENT

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment

Name of proposal	Kurdish Community Centre Asset Transfer
Service area	Strategic Property
Officer completing assessment	Shehnaz Begum
Equalities/ HR Advisor	Rebecca Hatch, Ashley Hibben
Cabinet meeting date (if applicable)	12 th December, 2017
Director/Assistant Director	Vicky Clark

2. Summary of the proposal

Please outline in no more than 3 paragraphs

- The proposal which is being assessed*
- The key stakeholders who may be affected by the policy or proposal*
- The decision-making route being taken*

The Kurdish Community Centre (“KCC”) (Company No. 04046072) have made a written request to acquire the freehold interest of the Kurdish Community Centre, Fairfax Hall. The site is occupied by KCC but will be acquired by the newly formed entity called Yek-Kurd Community Interest Company (Yek-Kurd CIC) company no: 10221323. The company is owned by a number of shareholders.

This Report seeks approval to dispose of the Council’s freehold interest in the Kurdish Community Centre site for a sum below the open market value and that such disposal be guided by the principles of the Council’s Community Asset Transfer (CAT) policy, safeguarding the building for future community use.

The key stakeholders who will be affected by the decision will be the Kurdish diaspora who use the Kurdish Community Centre, both from the local area and borough and from across London. The Centre is a regional hub for the Kurdish community. Decisions about the future of the centre may also affect the wider local community, in particular residents of ‘the Gardens’ streets in St Ann’s Ward.

The decision is due to be taken at Cabinet on 12th December, 2017.

3. What data will you use to inform 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. Please include any gaps and how you will address these

This could include, for example, data on the Council’s workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	Census 2011 https://www.ons.gov.uk/census/2011census ONS/ NOMIS https://www.nomisweb.co.uk/reports/lmp/la/1946157250/report.aspx?town=Haringey https://www.nomisweb.co.uk/census/2011/small_population	The proposal does not impact

	<p>Haringey Joint Strategic Needs Assessment (JSNA) http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna GLA Intelligence London Datastore https://londondatastore-upload.s3.amazonaws.com/instant-atlas/borough-atlas/atlas.html</p>	<p>t on Haringey Council staff.</p>
Gender Reassignment	<p>Haringey JSNA http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna</p>	
Age	<p>Census 2011 https://www.ons.gov.uk/census/2011census ONS/ NOMIS https://www.nomisweb.co.uk/reports/lmp/la/1946157250/report.aspx?town=Haringey https://www.nomisweb.co.uk/census/2011/small_population Haringey JSNA http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna GLA Intelligence London Datastore https://londondatastore-upload.s3.amazonaws.com/instant-atlas/borough-atlas/atlas.html</p>	
Disability	<p>Haringey JSNA http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna</p>	
Race & Ethnicity	<p>Census 2011 https://www.ons.gov.uk/census/2011census ONS/ NOMIS https://www.nomisweb.co.uk/reports/lmp/la/1946157250/report.aspx?town=Haringey https://www.nomisweb.co.uk/census/2011/small_population Haringey JSNA http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna GLA Intelligence London Datastore https://londondatastore-upload.s3.amazonaws.com/instant-atlas/borough-atlas/atlas.html Haringey Community Safety Partnership Strategic Assessment 2016-17 (internal document)</p>	
Sexual Orientation	<p>Joint Strategic Needs Assessment (JSNA) http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna</p>	
Religion or Belief (or No Belief)	<p>Census 2011 https://www.ons.gov.uk/census/2011census GLA Intelligence London Datastore https://londondatastore-upload.s3.amazonaws.com/instant-atlas/borough-atlas/atlas.html</p>	
Pregnancy & Maternity	<p>Haringey JSNA http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment-jsna</p>	

	Haringey Community Safety Partnership Strategic Assessment 2016-17 (internal document)	
Marriage and Civil Partnership		
<p>Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?</p> <p><i>Explain how you will overcome this within the proposal.</i></p> <p><i>Further information on how to do data analysis can be found in the guidance.</i></p>		
<p>Users of the Kurdish Community Centre (KCC) organisation, facilities and services are the primary communities and groups impacted by this decision.</p> <p>KCC was set up to facilitate integration and provide ongoing support for the Kurdish diaspora in the UK, primarily located in the London region. It also provides support and services to other Turkish- speaking communities, asylum seekers and refugees, including Turkish and Turkish- Cypriot groups. The Kurdish community is most likely to be most disproportionately affected by the proposal and will therefore be the focus of this impact assessment.</p> <p>Services provided by KCC</p> <p>KCC's primary activities are the provision of advice and advocacy, educational, and cultural programmes, primarily to the Kurdish community both in the borough and across London. These services are outlined in the main report. There is limited data on overall use of the building by the Kurdish and other Turkish speaking communities. The most significant services accessed since September 2016 are:</p> <ol style="list-style-type: none"> 1. English language courses: 200 clients 2. Folk dance: 45 community members 3. Kurdish language classes: 55 children 4. Roj Women Domestic Violence Breakfast Club: 100 clients per month¹ <p>The centre also provides free use of the centre for other community groups. These include Gardens Resident Association, Iranian Community Centre, Ecuadorean community centre, and Sisters Uncut. Two migrant support charities, Migrants organise and Migrants Resource centre, have also recently started to use the centre of a regular basis.</p> <p>The Kurdish diaspora in the UK</p> <p>The Kurdish community are united through race, culture and language. They adhere to a number of different religions and creeds, although the majority are Sunni Muslims. Populations identifying as ethnic Kurds are significant minorities in Turkey (15 to 20% of the population) and Iraq (17 to 20%), with smaller Kurdish communities located in</p>		

¹ Provided by Ibrahim Yahil, KCC

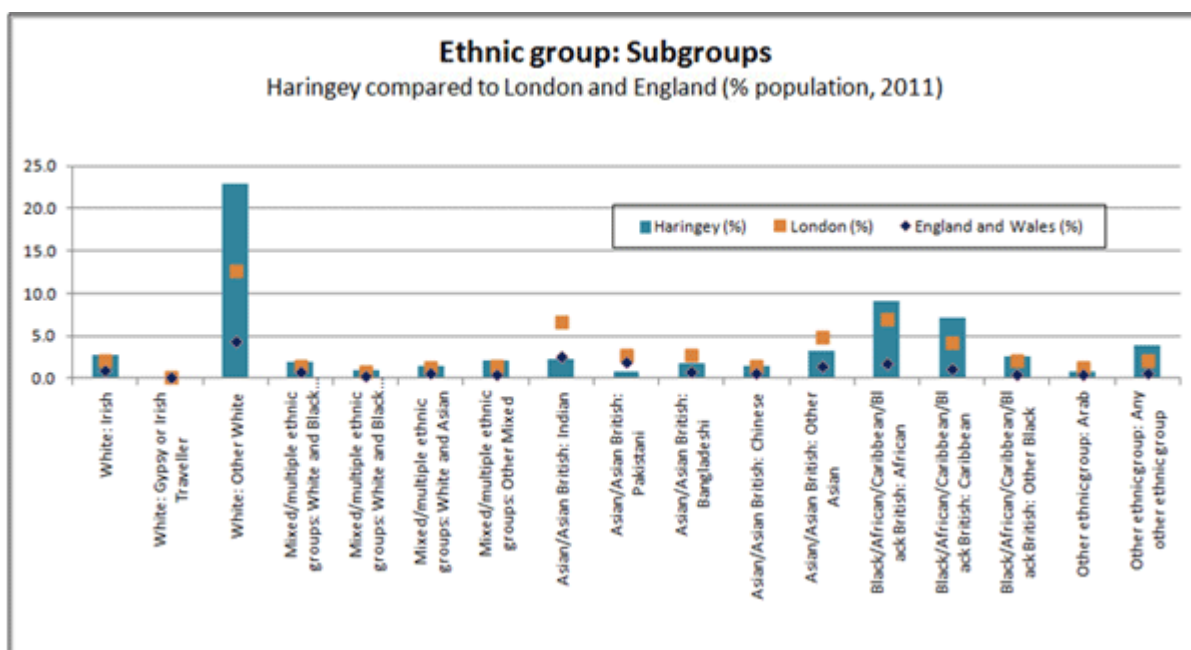
Syria, Iran and Armenia. These communities form an area in the Middle East often referred to as Kurdistan, although this is not a recognised nation state.

It is thought that the large majority of the current Kurdish community immigrated to the UK in the 1980s and early 1990s.² This was a period of prolonged and well documented violence and political persecution against the Kurdish minorities in Turkey and Iraq. The Kurdish and Turkish immigrants from this period mostly settled in the northern boroughs of London, namely Enfield, Hackney, Haringey and Islington.

The exact size of the Kurdish diaspora is difficult to ascertain from the available population data and ethnic classifications. However the Census and official labour market statistics (NOMIS) do enable us to identify the Kurdish community by some self-reported characteristics such as ethnicity.

Identifying the communities impacted

The Turkish community is usually included in the 'White: Other' classification, while many Kurds classify themselves as 'Other ethnic group':



Source: Haringey JSNA

The data indicates that both groups are over-represented in Haringey compared to London and national averages.

Haringey is the 8th most diverse borough in London. As the graph shows it has a much larger proportion of residents from the Other White ethnic group (29%) than the statistical neighbour or London average (both 17%). There is more ethnic diversity in east Haringey than west. It is also known that Haringey has a very transient population- 5% of residents have lived in the borough less than 2 years.

Turkish community

² Ibrahim Sirkeci, 'Migration from Turkey to the UK', International Migration Institute (IMI) (May 2017), <https://www.imi.ox.ac.uk/blog/migration-from-turkey-to-the-uk>

The Census data does provide for further identification of significant minority ethnicities through the [ONS Small Population datasets](#). Haringey has the third-highest number of ethnic Turkish residents in England and Wales:

Local authority	Usual residents with ethnic group: Turkish
Enfield	16704
Hackney	10606
Haringey	10329
Waltham Forest	4063
Islington	4317

Kurdish community

The Kurdish community is more difficult to identify as outlined above. According to [NOMIS](#), at Census 2011: 6868 people in London (the 32 boroughs and City of London) identified as 'White: Kurdish'; 445 as 'Mixed/ multiple ethnic group: Kurdish'; 1658 as 'Asian/ Asian British: Kurdish'; and 11,991 as 'other ethnic group: Kurdish.'

According to the ONS Small Population datasets (based on Census responses) Haringey has the second- largest resident Kurdish population in England and Wales:

Local authority	Usual residents with Ethnic Group: Kurdish
Enfield	3584
Haringey	3280
Birmingham	2303
Hackney	2083
City of London, Westminster	1920

By this measure Haringey's resident Kurdish community represents 8% of the total ethnic Kurdish community in England and Wales (40,558) and 17.2% of London's ethnic Kurdish community (19,080). The data shows that a high proportion of the London and national Kurdish community lives in Haringey and surrounding boroughs.

Sex

There are more males identifying as 'Ethnic Group: Kurdish' than females and they are proportionately overrepresented compared to the Haringey and London average:

	Ethnic group: Kurdish in Haringey	Haringey average (all groups)	London average (all groups)
Male	54.8%	49.5%	49.2%
Female	45.2%	50.5%	50.8%

Source: Haringey JSNA/ Census 2011/ ONS Small population datasets

Age

The age structure of the Kurdish community identifying as 'Ethnic Group: Kurdish' also differs significantly from the Haringey and London average:

	Ethnic Group: Kurdish in Haringey	Haringey average (all groups)	London average (all groups)
0-19	35.8%	24.9%	24.5%
20-39	37%	38.5%	35.7%
40-59	22.9%	24.3%	24.4%
60+	0.04%	12.3%	15.2%

The proportion of children and young people (under 20) resident in Haringey is significantly higher in this group compared to the Haringey and London population. There are also substantially less residents over 60 who identify as 'Ethnic Group: Kurdish' compared to the Haringey and London population.

Religion/ belief (or non belief)

It is accepted that the wider Turkish and Kurdish communities at least culturally identify as Muslim. However, the Council does not collect data on this that can confirm this assumption with regards to Haringey residents.

Census 2011 shows that Haringey is one of the most religiously diverse places in the UK. 45% of Haringey residents were Christian, slightly less than 48.4% in London overall. The second most common religion stated was Muslim followed by Hindu and Jewish:

	Haringey (popn.)		Haringey (%)		London (%)	
	2001	2011	2001	2011	2001	2011
All usual residents	216,507	254,926	216,507	254,926	7,172,091	8,173,941
Christian	108,404	114,659	50.1	45.0	58.2	48.4
Buddhist	2,283	2,829	1.1	1.1	0.8	1.0
Hindu	4,432	4,539	2.0	1.8	4.1	5.0
Jewish	5,724	7,643	2.6	3.0	2.1	1.8
Muslim	24,371	36,130	11.3	14.2	8.5	12.4
Sikh	725	808	0.3	0.3	1.5	1.5
Other religion	1,135	1,303	0.5	0.5	0.5	0.6
No religion	43,249	64,202	20.0	25.2	15.8	20.7
Religion not stated	26,184	22,813	12.1	8.9	8.7	8.5

Source: Haringey JSNA

Particular challenge faced by the Kurdish community

Education

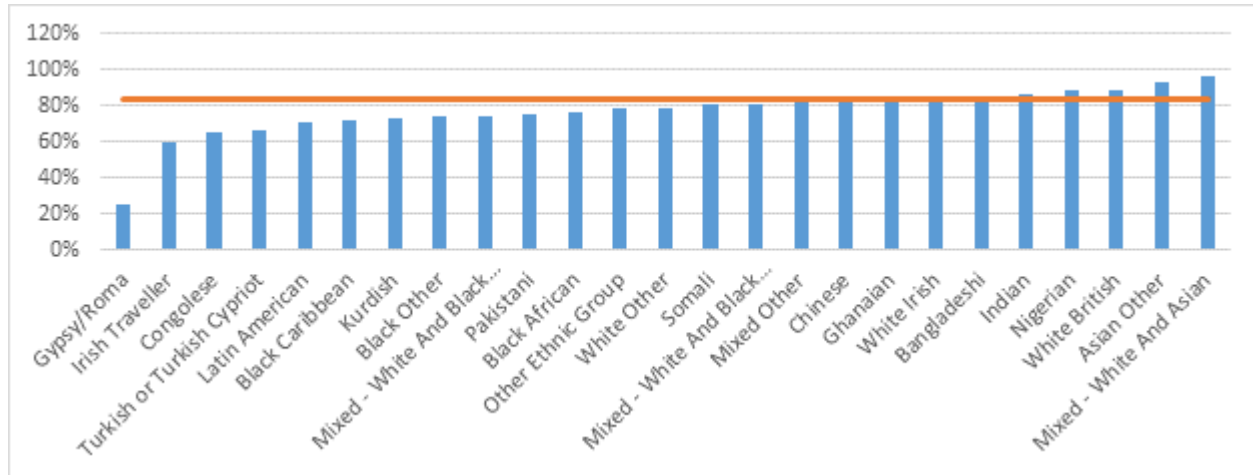
In Haringey there are significant disparities in educational outcomes for pupils from different ethnic backgrounds.

At Key Stage 2 the groups most likely to achieve level 4+ are Mixed – White and Asian (96%), Asian Other (93%), White British (88%) and Nigerian (88%). Pupils from

Gypsy/Roma (25%), Irish Traveller (60%), Congolese (65%) and Turkish or Turkish Cypriot (66%) pupils are least likely to achieve level 4+ at KS2:

Key Stage 2

Figure 5. Indicator 4 – Key Stage 2 attainment level 4+ (including reading, writing and mathematics, 2013–15)

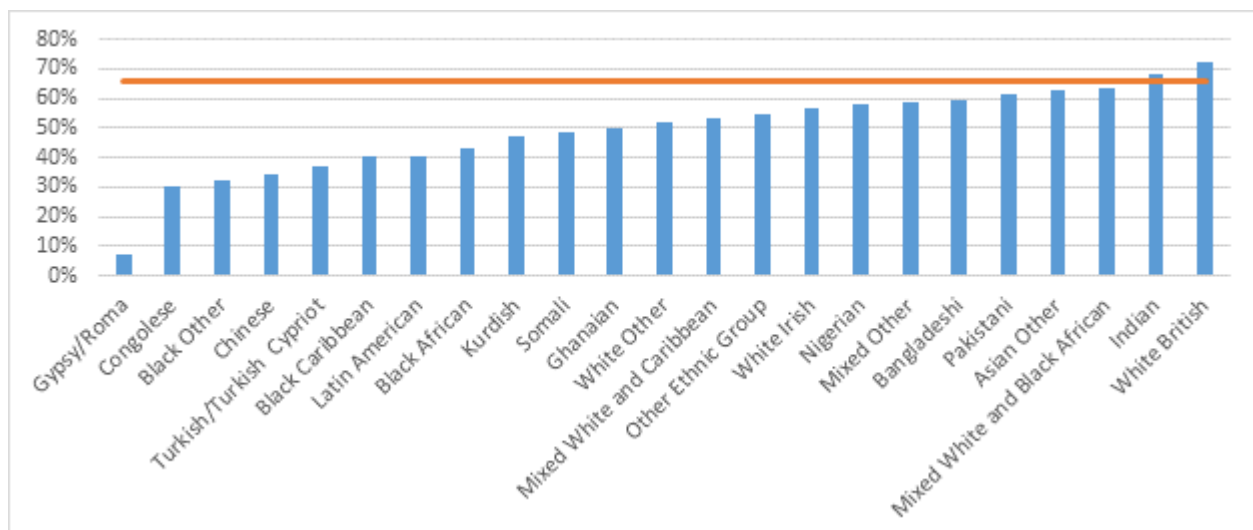


The graph above shows that the Kurdish pupils also perform below the London average.

Educational inequality in Haringey becomes more entrenched when we look at KS4 data, with gaps within the borough becoming more significant. The groups most likely to achieve 5 A*–C in KS4 are White British (72%), Indian (68%), Mixed – White and African (64%) and Asian Other (63%). Pupils from Irish Gypsy/Roma (7%), Congolese (31%), Black Other (32%), and Chinese (34%) backgrounds are the least likely to achieve 5 A*–C in KS4. Most of the groups in Haringey underperform relative to the London average of 66%:

Key Stage 4

Figure 6. Indicator 5 – GCSE (KS4) attainment five or more A*–C grades (including English and mathematics) 2013–15



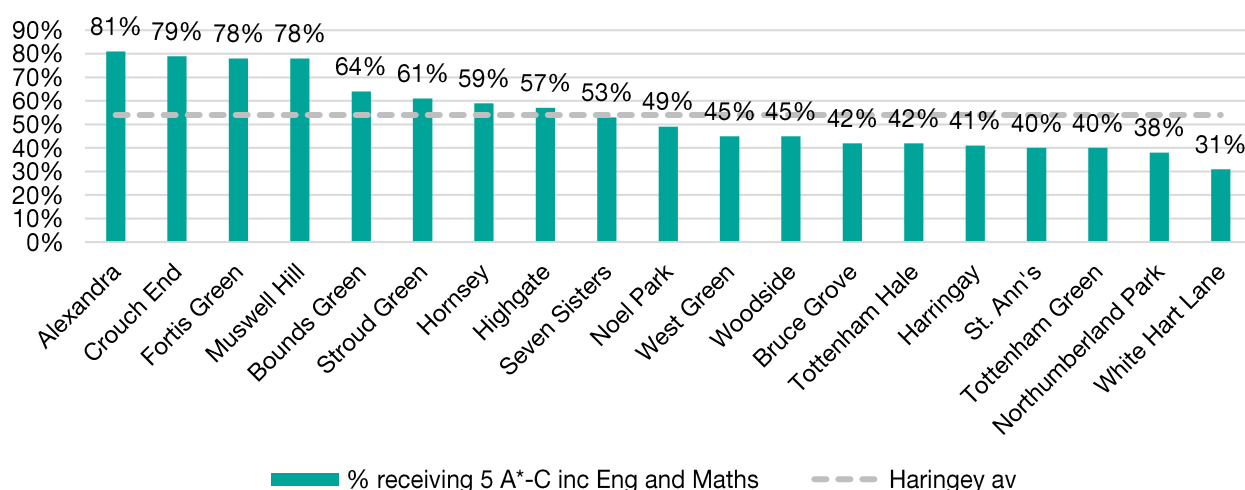
Again the graph above shows that the Kurdish pupils also perform significantly below the London average.³

In total there are 481 Kurdish children in Haringey's primary and secondary schools.⁴

Top schools by number of Kurdish pupils	
School	No. Kurdish pupils
Northumberland Park Community School	46
Park View	34
Gladesmore Community School	29
Alexandra Park School	27
Noel Park Primary School	26
Woodside High School	26
Heartlands High School	25
Lea Valley Primary School	22
Highgate Wood School	21
Hornsey Girls School	16

Secondary schools in the east of the borough have the largest numbers of Kurdish children. Educational attainment in the east of the borough is generally lower than the west of the borough:

% achieving 5 A*-C including English and Maths, 2015/16



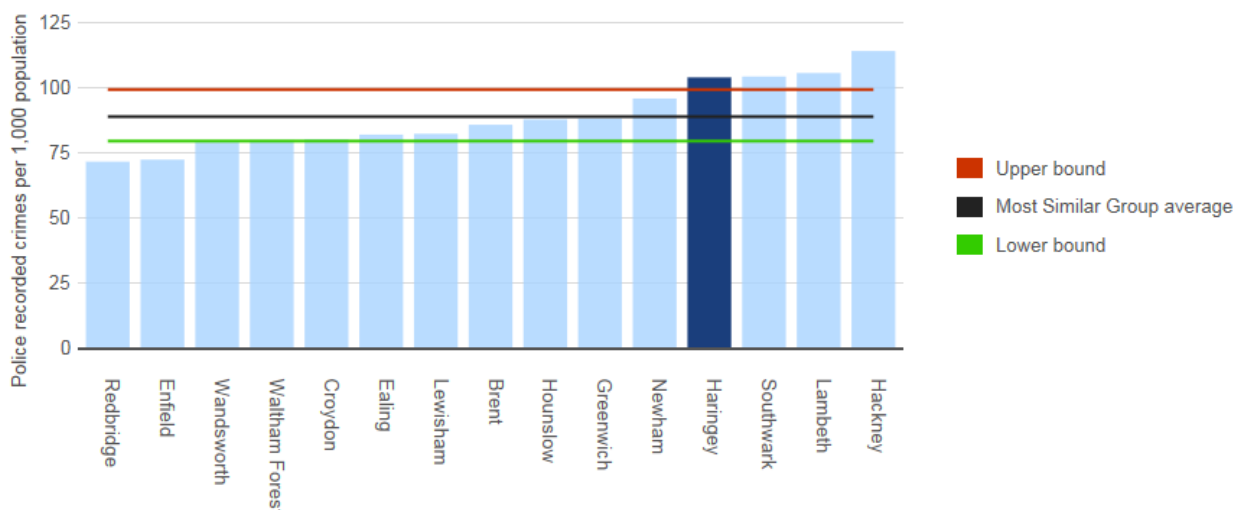
It is therefore more likely that Kurdish children and young people face inequalities in educational attainment and need greater support.

³ Runnymede Trust (2017)

⁴ Haringey School Census, January 2017

Crime

The overall crime rate in Haringey is higher than the average in comparable areas:⁵



The data does not specify precise types of crime that have a disproportionate impact on the Kurdish community in particular. However Haringey's JSNA indicates that Kurdish women may face inequalities around domestic violence related crimes.

- IMECE works primarily with Turkish and Kurdish women, as well as women from other black and minority ethnic communities, and with women and girls who have experienced / are at risk of 'honour'-based abuse and forced marriage.
- According to the Iranian and Kurdish Women's Rights Organisation (report published December 2011), there are almost 3,000 incidents of 'honour'-based violence every year in the UK; London is the worst area with 495 police-recorded incidents, a figure which doubled from 2009 to 2010 and is now five times the national average.

There has also been a London wide trend of increased reports of hate crime over the past year. Haringey has experienced an increase of +45% in hate crime reports in the past 12 months. London as a whole has seen an increase of +19%. Hate crime is known to have a wider impact on confidence levels and community cohesion across the borough

	Haringey October 2014 – September 2015	Haringey October 2015 – September 2016	Haringey Change %	London Change %
Racist & Religious Hate Crime	432	633	+46.5%	+19.0%
Homophobic Hate Crime	55	72	+30.9%	+15.8%
Anti-Semitic Hate Crime	24	33	+37.5%	-2.0%

⁵ Police.uk data

Islamophobic Hate Crime	20	48	+140.0%	+58.2%
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Source: Haringey/ MPS Community Safety Strategic Assessment 2016-17

The data suggests that a minority community such as the Kurdish community is more likely to be a victim of hate crime, and the probability is currently higher in Haringey compared to London as a whole. The Kurdish community is culturally associated with Islam, at a time when Islamophobic hate crime has risen in Haringey.

Housing

Across London those of **Asian (14%), Black (11%) or Other (12%) ethnicity** are more than **five times more likely** than those of White British ethnicity (2%) to be living in households with **over 1 person per room**. The Kurdish community is likely to be included in the 'Other' ethnicity category.

3% of households in Haringey are overcrowded, with over 1.5 persons per room. This is substantially higher than the statistical neighbour and London averages, and the 4th highest rate of all London boroughs. Many ethnic minority groups are over five times more likely to be in overcrowded households than those of White British ethnicity. It is therefore more likely that the Kurdish community in Haringey is impacted by overcrowded housing and requires further support to alleviate this.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

Council Officers and KCC have held various meetings at Council offices concerning the freehold asset transfer of the Kurdish Community Centre (KCC). The Trustees/Director of the KCC has informed the Council that they are in regular communication with the Groups and users of the building and have updated them on their plans to acquire the building from the Council. In support of the possible acquisition members and shareholders of the newly formed Community Interest Company (CIC) have donated the full capital funds to KCC to acquire the building.

To safeguard the asset for community use KCC have been informed that the freehold disposal will contain restrictive covenants on the Title document to ensure that the building is used as a community centre for community purposes. The transfer of freehold title will reflect the principles of the Council's Community Asset Transfer Policy.

A five yearly maintenance plan must also be in place to ensure the building remains in good condition. The terms and conditions of the transfer have been accepted by KCC.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

Due to the political background and history, as described above, Kurdish communities feel very strongly about the need for property ownership. Therefore, generally it is the preference of Kurdish people to have freehold ownership of properties rather than leasehold.

Also, KCC have informed the Council that they would be in a better position to secure grant funding from Kurdish communities and external providers for building maintenance and community related projects if the building was in the freehold ownership of the CIC.

KCC have also informed the Council that the main users of the building are in favour of the acquisition as it gives them better security in terms of their own occupation of the building.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqlA guidance

1. Sex

Males are proportionally overrepresented in the known Kurdish community compared to the Haringey and London population averages. Maintaining the KCC is likely to benefit more males than females. However, the female Kurdish population will benefit from a number of programmes that are based at the KCC that address specific issues for that group. This includes domestic violence support networks and support for children of school age

Positive	X	Negative		Neutral impact		Unknown Impact	
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2. Gender reassignment

Data on this characteristic is not available in the main statutory sources to date. However, as part of its commitments to community use KCC would be expected to

ensure there is no discrimination, victimisation or harassment on the basis of gender identity.

Positive		Negative		Neutral impact		Unknown Impact	X
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3. Age

KCC provides services to a range of age groups, both in the Kurdish community and other ethnic minority communities. Children and young people (0-19 years) are proportionally overrepresented in the known Kurdish community compared to the Haringey and London population averages, while older people (60+ years) are significantly underrepresented. KCC services such as the supplementary school and language classes will support a range of age groups in the community to overcome barriers to known inequalities. This includes children and young people who are likely to suffer inequality in educational attainment, and older working age adults for whom English language skills can be a barrier to obtaining employment.

Positive	X	Negative		Neutral impact		Unknown Impact	
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4. Disability

It is not anticipated that this decision will have a direct or disproportionate impact on residents sharing this characteristic. It will be expected that KCC and community groups using the facilities continue to ensure access to facilities and services for all residents who share this characteristic and those who do not.

Positive		Negative		Neutral impact	X	Unknown Impact	
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5. Race and ethnicity

The proposal will ensure that KCC continues to serve the personal and cultural needs of the Kurdish community and other minority ethnic communities, both in Haringey and neighbouring boroughs. The services provided, including English language classes and additional educational support, enable users from those communities to overcome known barriers in employment and education. This contributes to overcoming inequality in opportunity and also fosters good community relations and cohesion.

Positive	X	Negative		Neutral impact		Unknown Impact	
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6. Sexual orientation

Neither KCC or the Council holds specific data on the users of KCC or the overall profile of the local population with regard to this characteristic. It is not anticipated that this decision will have a disproportionate impact on this characteristic. However it would be expected that KCC and services hosted at the facility prevent discrimination

on this basis and work to foster good relations between the different groups under this characteristic.

Positive		Negative		Neutral impact		Unknown Impact	X
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6. Religion or belief (or no belief)

KCC does not provide facilities, services and community activities on the basis of religion or belief (or non-belief). Located in a diverse part of the borough, KCC expects to maintain fair access to the centre for communities of different religions and beliefs (or non-belief) as part of its commitment to community use. However, as a culturally Muslim community, the Kurdish community potentially faces greater likelihood of being victims of hate crime.

Positive	X	Negative		Neutral impact		Unknown Impact	
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8. Pregnancy and maternity

There is evidence that the incidence of domestic violence against women increases during pregnancy. KCC hosts a number of groups that support survivors and groups at greater risk of domestic violence and “honour-based” abuse.

Positive	X	Negative		Neutral impact		Unknown Impact	
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9. Marriage and Civil Partnership *(Consideration is only needed to ensure there is no discrimination between people in a marriage and people in a civil partnership)*

Positive		Negative		Neutral impact		Unknown Impact	X
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10. Groups that cross two or more equality strands e.g. young black women

Outline the overall impact of the policy for the Public Sector Equality Duty:

- Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?

This includes:

- Remove or minimise disadvantage suffered by persons protected under the Equality Act
- Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
- Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low

- Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?

This decision will maintain the Kurdish Community Centre as a facility for local communities (both Kurdish and others) to access and use for cultural and support activities. The freehold transfer contains significant covenants akin to those contained in the Community Asset Transfer (CAT) Policy to ensure that it remains open and accessible to the wider community in Haringey.

Section 3 above outlines the specific characteristics of the Kurdish community and analyses their subsequent needs.

The services provided by KCC and other organisations accessing the facility help protected groups and minority communities to overcome known inequalities and barriers to participation in the wider community. For example, English language classes enable the community to overcome a known barrier in education and employment, and community participation.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqlA guidance

Outcome	Y/N
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	Y
Adjust the proposal: the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which protected characteristics are impacted?	Action	Lead officer	Timescale

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

7. Authorisation	
EqlA approved by	

(Assistant Director/ Director)	Date
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8. Publication <i>Please ensure the completed EqlA is published in accordance with the Council's policy.</i>

Please contact the Policy & Strategy Team for any feedback on the EqlA process.