



**CABINET
AGENDA**
for the meeting
on
18 February 2021 at
6.30 pm

To: Croydon Cabinet Members:

Councillor Hamida Ali, Leader of the Council
Councillor Stuart King, Deputy Leader (Statutory) and Cabinet Member for Croydon Renewal
Councillor Muhammad Ali, Cabinet Member for Sustainable Croydon
Councillor Jane Avis, Cabinet Member for Homes & Gateway Services
Councillor Janet Campbell, Cabinet Member for Families, Health & Social Care
Councillor Alisa Flemming, Cabinet Member for Children, Young People & Learning
Councillor Oliver Lewis, Cabinet Member for Culture & Regeneration
Councillor Manju Shahul-Hameed, Cabinet Member for Economic Recovery & Skills
Councillor David Wood, Cabinet Member for Safety, Communities & Resilience
Councillor Callton Young OBE, Cabinet Member for Resources & Financial Governance

Invited participants:

Councillor Louisa Woodley, Chair of the Health & Wellbeing Board
All other Members of the Council

A meeting of the **CABINET** which you are hereby summoned to attend, will be held on **Thursday, 18 February 2021 at 6.30 pm. This meeting will be held remotely**

JACQUELINE HARRIS BAKER
Council Solicitor and Monitoring Officer
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10 February 2021

PLEASE NOTE: Members of the public are welcome to remotely attend this meeting via the following web link: <https://webcasting.croydon.gov.uk/meetings/11631>

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If you require any assistance, please contact Victoria Lower 020 8726 6000 x14773 as detailed above.

AGENDA – PART A

1. Apologies for Absence

2. Disclosure of Interests

In accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, Members and co-opted Members of the Council are reminded that it is a requirement to register disclosable pecuniary interests (DPIs) and gifts and hospitality to the value of which exceeds £50 or multiple gifts and/or instances of hospitality with a cumulative value of £50 or more when received from a single donor within a rolling twelve month period. In addition, Members and co-opted Members are reminded that unless their disclosable pecuniary interest is registered on the register of interests or is the subject of a pending notification to the Monitoring Officer, they are required to disclose those disclosable pecuniary interests at the meeting. This should be done by completing the Disclosure of Interest form and handing it to the Democratic Services representative at the start of the meeting. The Chair will then invite Members to make their disclosure orally at the commencement of Agenda item 3. Completed disclosure forms will be provided to the Monitoring Officer for inclusion on the Register of Members' Interests.

3. Urgent Business (If any)

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

4. Croydon Renewal Plan Update (To Follow)

Cabinet Member: Leader of the Council, Councillor Hamida Ali

Officer: Interim Chief Executive, Katherine Kerswell

Key decision: no

5. Rent Setting Policy for Council Homes (Pages 7 - 26)

Cabinet Member: Cabinet Member for Homes & Gateway Services, Councillor Jane Avis

Officer: Executive Director Health, Wellbeing & Adults, Guy Van Dichele

Key decision: no

6. Review of Brick by Brick Croydon Ltd: Brick by Brick Shareholder decision - the future of the company (Pages 27 - 52)

Cabinet Member: Leader of the Council, Councillor Hamida Ali

Officer: Interim Chief Executive, Katherine Kerswell

Key decision: yes

- 7. Interim Assets Disposal Strategy (Pages 53 - 80)**
Cabinet Member: Cabinet Member for Croydon Renewal, Councillor Stuart King and Cabinet Member for Resources & Financial Governance, Councillor Callton Young
Officer: Executive Director Place, Shifa Mustafa
Key decision: yes
- 8. Croydon Equalities Strategy (Pages 81 - 256)**
Cabinet Member: Cabinet Member for Communities, Safety & Resilience, Councillor David Wood
Officer: Interim Chief Executive, Katherine Kerswell
Key decision: no
- 9. Education Standards (Pages 257 - 278)**
Cabinet Member: Cabinet Member for Children, Young People & Learning, Councillor Alisa Flemming
Officer: Interim Executive Director Children, Families & Education, Debbie Jones
Key decision: no
- 10. Scrutiny Stage 1: Recommendations from Scrutiny & Overview Committee (To Follow)**
Lead Member: Chair of Scrutiny & Overview Committee, Councillor Sean Fitzsimmons
Officer: Executive Director Resources, Jacqueline Harris Baker
Key decision: no
- 11. Stage 2 Response to Recommendations arising from Children & Young People Sub-Committee held on 3 November 2020, Health & Social Care Sub-Committee held on 10 November 2020 and Scrutiny & Overview Committee held on 17 November 2020 (Pages 279 - 290)**
Cabinet Member: All Cabinet Members
Officer: Executive Director Resources, Jacqueline Harris Baker
Key decision: no
- 12. Call-In Referral to Cabinet: Emissions Based Parking Charges (Pages 291 - 298)**
Cabinet Member: Cabinet Member for Sustainable Croydon, Councillor Muhammad Ali
Officer: Executive Director Place, Shifa Mustafa
Key decision: yes

13. Exclusion of the Press and Public

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

“That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended.”

PART B AGENDA

14. Review of Brick by Brick Croydon Ltd: Brick by Brick Shareholder decision - the future of the company (Pages 299 - 344)

Cabinet Member: Leader of the Council, Councillor Hamida Ali

Officer: Interim Chief Executive, Katherine Kerswell

Key decision: yes

15. Interim Assets Disposal Strategy (Pages 345 - 352)

Cabinet Member: Cabinet Member for Croydon Renewal, Councillor

Stuart King and Cabinet Member for Resources & Financial Governance

Officer: Executive Director Place, Shifa Mustafa

Key decision: yes

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For General Release

REPORT TO:	CABINET 18 February 2021
SUBJECT:	Rent-Setting Policy for Council Homes
LEAD OFFICER:	Guy Van Dichele, Executive Director Health, Wellbeing and Adults Ozay Ali Interim Director for Homes and Social Investment Yvonne Murray, Director of Housing Solutions
CABINET MEMBER:	Councillor Jane Avis, Cabinet Member for Homes and Gateway Services
WARDS:	All
CORPORATE PRIORITY/POLICY CONTEXT	
<p>The policy proposed in this report aligns with the priority commitments in the Croydon Renewal Improvement Plan to</p> <ul style="list-style-type: none"> ○ live within our means, balance the books and provide value for money for our residents; and ○ focus on providing the best quality core service we can afford. <p>The policy proposed fits with the intention set out in the Croydon Renewal Improvement Plan to ensure our systems, processes and controls are fit for purpose, and by clarifying the rent-setting process within the Housing Revenue Account we are contributing towards the Council's intention to become more transparent, open and honest.</p>	
FINANCIAL IMPACT	
None.	
FORWARD PLAN KEY DECISION REFERENCE NO.: This is not a key decision	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

The Cabinet is recommended to

- 1.1 Review the Rent-Setting Policy for Council Homes Within the Housing Revenue Account ("The Policy"), appendix 1 hereto and as detailed within the report and recommend to Full Council the adoption of this policy in accordance with Article 4.02 of Part 2 of the Constitution.

2. EXECUTIVE SUMMARY

- 2.1 This report introduces the proposed Rent-Setting Policy for properties within the Council's Housing Revenue Account (HRA). This proposed policy aims to clarify and codify existing practice within the Council's Housing department, and seeks to ensure compliance with recent Government Policy and directives from the Regulator for Social Housing (RSH). Failure to set rents correctly would put the Council at risk of non-compliance with rent and data quality requirements as set out by the RSH, and impact on our ability to maximise income, putting the services we provide to our residents at risk.
- 2.2 The Council's Constitution requires that all 'Plans, Policies and Strategies which together make up the Housing Strategy' are approved by Full Council. Cabinet approved the commencement of research and preparation of a new Housing and Homelessness Strategy for Croydon in October 2019, but work on this Strategy has been put on hold due to the impact of the coronavirus pandemic and deployment of relevant staff to other priority duties. The proposed Rent-Setting Policy will form part of the relevant plans, policies and strategies which together make up the Housing Strategy and will supplement and support the Croydon's Housing and Homelessness Strategy when it is implemented.
- 2.3 Each year, the Council reviews and sets rents for homes within the HRA and must issue a statutory notice to notify tenants of any proposed change in the rent they will pay, in accordance with legislation. The proposed policy outlines how the Council will calculate rent for the social rent homes that it owns within the HRA, and provides a clear framework for setting rents for any new properties that are developed or acquired.
- 2.4 The proposed Rent-Setting Policy does not create any financial impact for the HRA or the Council's General Fund. The Policy reflects financial assumptions that have been and will continue to be included as a baseline in the Council's HRA Business Plan.

3. LEGAL AND REGULATORY FRAMEWORK

- 3.1 The affordability of rents is one of the fundamental benefits of social housing and setting social housing rents in line with legislation and Government policy is an essential requirement for a Registered Provider (RP) such as the Council.
- 3.2 The [Direction on the Rent Standard 2019](#) ("The Direction") was issued by the Secretary of State in February 2019 and required the RSH to comply with the Policy Statement on Rents.
- 3.3 The [Policy Statement on Rents for Social Housing](#) (the Policy Statement), was published by the Ministry of Housing, Communities & Local Government (MHCLG) in February 2019 and sets out the Government's policy on rents for social housing to which the RSH must have regard in setting the Rent Standard and to which the Council must similarly have regard to the Policy Statement as the Rent Standard itself must require registered providers, such as the Council

to comply with the rules about the levels of rent set as required by paragraphs 7 and 8 of the Direction.

- 3.4 The RSH's published regulatory standards set out the outcomes that RPs are expected to achieve - they are set out in a regulatory framework and are classified as either 'economic' or 'consumer' standards. The revised [Rent Standard](#), (an economic standard) was introduced by the RSH in April 2020, and applies to all RP and Local Authority low-cost rental accommodation. Registered providers and the Council must comply in full with all the requirements and expectations set out in the Rent Standard. They must additionally comply with all the requirements and expectations of the Rent Policy Statement on the setting, increase and decrease of rents and service charges. It allows rents to be increased annually up to the Consumer Price Index (CPI) measure of inflation, plus 1%, in accordance with the Policy Statement and the Governments directive to the RSH. CPI is based on the September of the previous year.
- 3.5 As a Landlord, the Council is obliged to comply with the contractual arrangements detailed in its tenancy agreements which specify initial rental charges and the mechanism for staging rental changes in accordance with Sections 13 and 14 of the Housing Acts 1988 (Assured Tenancies) and Housing Act 1985 (Secure Tenancies).
- 3.6 The Welfare Reform and Work Act 2016 required RPs to reduce social housing rents by 1% per year for four years from 2016/17 (the 'social rent reduction'). This legislative requirement has now been replaced as directed by Government, as reflected in the Rent Standard.
- 3.7 [Setting rents for social housing – addendum to the Sector Risk Profile 2019](#) was issued by the RSH in March 2020 to supplement the [2019 Sector Risk Profile](#) report and sets out what the sector can expect with regard to the regulation of rent requirements in future.

4. PURPOSE AND SCOPE

- 4.1 The Council is committed to providing rented housing at genuinely affordable rents. The policy aims to assist in setting rent for homes which are owned and managed by the Council within the Housing Revenue Account and is proposed to be reviewed every five years or prior to that to ensure compliance with the latest legal and regulatory requirements.
- 4.2 The Policy aims to ensure current and future rents are set at levels which maintain the financial viability of the HRA, allow continual service improvement, are fair and affordable for all residents, and are compliant with statutory and regulatory requirements. For homes where rents can increase, this will take place every April.
- 4.3 The Policy, if approved and adopted, will apply to 13,422 homes which are currently within the Council's HRA, and any new homes purchased by or developed within the HRA.

- 4.4 The Policy does not provide information or guidance regarding rents for other uses such as garages, parking spaces or caravan plots. The Policy does not provide information or guidance regarding service charges.
- 4.5 Any changes to rent levels will be communicated to residents clearly and in a timely fashion. Any rent increases will be explained to tenants in full and support will be provided to address any concerns or questions that they may have.

5. RENT POLICY BACKGROUND

- 5.1 Since 2001, the majority of rented social housing properties have been let at Social Rents, calculated using a formula set by Government that included assessment of the relative property value, relative local earnings and a weighting for the number of bedrooms. This formula-based approach was intended to ensure that similar social rents were charged for similar properties within a local area. The property valuation used to initially set the rent must be appraised in accordance with the Royal Institute of Chartered Surveyors (RICS) 'Red Book' methodology.
- 5.2 In 2011, the government introduced the new 'Affordable Rent' tenure which allows rents (inclusive of service charges) to be set at up to 80% of market rent levels. The introduction of Affordable Rent was intended to improve the viability of social housing organisations and encourage the development of new homes. The Council has previously developed/purchased 95 new homes for Affordable Rent, but hasn't converted any existing Social Rented properties to Affordable Rent. No further conversions from existing Social Rent homes to Affordable Rent tenure are allowed under the current regulatory regime. The existing 95 Affordable Rent homes have rents set at 65% of Local Housing Allowance (LHA). LHA is the maximum amount of housing benefit available for a property of that size (in terms of bedroom numbers) in Croydon.
- 5.3 The Welfare Reform and Work Act 2016 introduced a new rent regime for social landlords from 1 April 2016. The Act introduced a 1% rent reduction for existing tenants in social and affordable housing for four years from 2016. This was intended to help reduce national welfare spending, and reduce costs for tenants paying all or part of their rent.
- 5.4 In October 2017, the government announced a new rent policy for a period of least five years, replacing the previous legislative requirements. The new Rent Standard allows yearly increases of up to CPI plus 1% for Social and Affordable Rent properties from April 2020. This took effect for Croydon Council HRA homes from April 2020.
- 5.5 The current GLA Affordable Housing Programme (2016-21) allows for the development of new homes funded by the GLA for letting at or below London Affordable Rent (LAR) levels (the benchmark values as set out at 6.4 below). The next GLA Affordable Housing Programme (2021-2026) removes this tenure, and the GLA are proposing to only fund the development of new homes for Social Rent (along with the intermediate products London Living Rent and Shared Ownership).

6. SETTING RENTS

- 6.1 In accordance with the Rent Standard, it is proposed that existing Social Housing rents will increase by CPI plus 1% every April. For 2020/21, this increase will be 1.5%. All tenants are entitled to four weeks notice of a change to their rent.
- 6.2 At present, the Council charges rents for 50 weeks of every year, so it is proposed that the Policy provide that all annual rent figures are calculated to pro-rata in this way.
- 6.3 General needs Social Rent levels are restricted by a Rent Cap set out in the Policy Statement to ensure affordability. Where a formula rent would be higher than the rent cap for a particular size of property, then the capped rent level must be used instead. In accordance with the Rent Standard the rent caps are increased each April by CPI (at September of the previous year) plus 1.5%. When a property that has been subject to the rent cap is re-let and the formula rent remains above the rent cap, the rent can be reset at the rent cap level, which will have increased each year by CPI +1.5%, rather than CPI +1%.
- 6.4 It is proposed that homes currently being developed by Brick by Brick and intended to be acquired for the HRA (which have GLA funding in place from the 2016-21 Affordable Homes Programme) be let at LAR benchmark levels in order to ensure these schemes are viable for the Council (further details of the Brick by Brick programme are included in a separate Cabinet paper also being considered in February 2021). The LAR benchmark rents are set out in the [GLA Affordable Homes Programme Capital Funding Guide \(2016-21\)](#). The table below sets out the current LAR benchmark levels.

Bedrooms	LAR 2020-21 per week
Bedsits, Studios & 1	£157.46
2	£166.70
3	£175.97
4	£185.23
5	£194.48
6	£203.74

- 6.5 In future where possible new general needs homes acquired by or developed for the HRA will be for Social Rent, and have rents set in line with the national formula as set out in the Policy Statement. It is proposed that the current property value will be assessed by an independent valuer following the RICS 'red book' guidance and the Council's rent-setting team will use the Nationwide House Price Index Calculator to index back to an equivalent property value in 1999, for use in the Social Rent setting formula. The year 1999 local earnings data for use in the Social Rent formula is provided by the Office for National Statistics 1997-99 New Earnings Survey, updated to 1999 prices.

7. RENT COMPARISON – EXAMPLE

- 7.1 As an example to illustrate the differences in rent levels the table below demonstrates the difference in monthly rent levels between Social Rent and London Affordable Rent for new build one, two and three bedroom properties in New Addington (at 2020/21 rent levels). The table also shows the monthly Local Housing Allowance (LHA) rate, and the percentage of LHA taken by LAR for the three different sizes of home. LHA is the maximum amount of housing benefit available for a property of that size (in terms of bedroom numbers) in Croydon. Finally the table illustrates a comparison between the proposed LAR levels and average local market rents (as provided by home.co.uk).

Number of Bedrooms	Property Value	Social Rent (per month)	London Affordable Rent (per month)	Local Housing Allowance (per month)	LAR as % of LHA	LAR as % of average local market rent
1	£295,000	£459.51	£682.33	£872.60	78%	73%
2	£340,000	£518.14	£722.37	£1096.98	66%	54%
3	£410,000	£590.85	£762.54	£1371.24	56%	43%

- 7.2 The table below demonstrates the impact of the 1.5% inflationary increase that is due in 2021/22 to both Social Rents and London Affordable Rents for these same example homes.

Number of Bedrooms	Social Rent (per month) 2020/21	Social Rent (per month) 2021/22	London Affordable Rent (per month) 2020/21	London Affordable Rent (per month) 2021/22
1	£459.51	£466.40	£682.33	£692.56
2	£518.14	£525.91	£722.37	£733.21
3	£590.85	£599.71	£762.54	£773.98

8. MONITORING AND IMPLEMENTATION

- 8.1 Rent levels and service charges will be monitored and compared across the areas where the Council holds housing stock. A summary of these charges will be reported in the annual HRA budget report submitted to Croydon's Tenant and Leaseholder Panel for review.
- 8.2 Assessment of the Council's overall HRA rental portfolio and its viability is undertaken by the Council's external consultants managing the HRA Business Plan (currently Savills). This is reported to full council annually.
- 8.3 The Housing Business Systems team will oversee the operational delivery of the proposed Policy, with rent-setting for individual properties undertaken by the Housing Income Control Manager.

8.4 Rents will be reported through the annual regulatory Statistical Data Return submission to the RSH.

9. CONSULTATION

9.1 No consultation is required on this policy as it is simply codifying existing practice and ensuring compliance with rent-setting procedures as set out by the RSH and national policy. There will be no changes to the terms and conditions of existing council tenancies, and no impact for council tenants.

10. PRE-DECISION SCRUTINY

10.1 Pre-decision scrutiny is not required as this is a non-executive decision. The proposed Policy is being presented to an informal session of the Streets, Homes and Environment Scrutiny Sub-Committee on 1st February, and any notes from that meeting will be included in the final version of this paper prepared for Cabinet.

11 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

11.1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2020/21 £'000	2021/22 £'000	2022/23 £'000	2023/24 £'000
Revenue Budget available				
Expenditure				
Income	-74,139	-75,250	-76,380	-78,688
Effect of decision from report				
Expenditure				
Income				
Remaining budget	<u>-74,139</u>	<u>-75,250</u>	<u>-76,380</u>	<u>-78,688</u>

11.2 The effect of the decision

This paper sets out the practices as regards rent setting currently operating and no financial impact is expected from the decision that they be recommended as Council policy

11.3 Risks

The primary risk in setting rents within the Housing Revenue Account is ensuring that relevant legislation, policy and guidance is followed. Setting rent at too low a level would not allow the Council to manage and maintain its own assets effectively and rents that are too high would challenge affordability for social tenants.

11.4 Options

The options available to Croydon are to maximize rents (as this policy sets out) or to charge less. Charging less would challenge the ability of the HRA to meet inflationary pressures, particularly at a time when building inflation is significantly higher than CPI+1% and additional fire safety requirements are on the horizon.

11.5 Future savings/efficiencies

The policy should be kept up-to-date in line with relevant legislation, policy and guidance.

Approved by Matthew Davis, Deputy S151 Officer, Finance Investment and Risk

12. LEGAL CONSIDERATIONS

- 12.1 The Head of Litigation and Corporate Law comments on behalf of the Interim Director of Law and Governance that there are no additional direct legal implications beyond those set out in the body of the report. The purpose of the policy is to ensure compliance with legal and regulatory requirements on the Council.

Approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Interim Director of Law and Governance & Deputy Monitoring Officer

13. HUMAN RESOURCES IMPACT

- 13.1 There are no direct Human Resources considerations arising from this report.

Approved by: Sue Moorman, Director of Human Resources

14. EQUALITIES IMPACT

- 14.1 An Equalities Analysis has not been undertaken for this proposed Policy as it is not making any change to the Council's existing processes and practice, and is intended to ensure compliance with Government policy and the standards of the Regulator for Social Housing.

Approved by: Yvonne Okiyo, Equalities Manager

15. ENVIRONMENTAL IMPACT

- 15.1 There is no environmental impact from the Policy proposed.

16. CRIME AND DISORDER REDUCTION IMPACT

- 16.1 There are no implications of the Policy proposed in relation to reduction/prevention of crime and disorder.

17. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 17.1 The formalising of rent-setting practice for the Council's social rent homes within the Housing Revenue Account is wise to ensure compliance with Government Policy and the requirements of the Regulator for Social Housing. Failure to set rents correctly would put the Council at risk of non-compliance with rent and data quality requirements as set out by the RSH, and impact on our ability to maximise income, putting the services we provide to our residents at risk. We would otherwise be at risk of breaching contract for non-compliance with the requirements of existing tenancy agreements, and impair the ability of the council to recover rents, were they not set correctly.

18. OPTIONS CONSIDERED AND REJECTED

- 18.1 The Council could continue to operate without the rent-setting policy formalised for social rent homes within the HRA, and processes as they currently stand are satisfactory. However, this approach would not ensure full transparency and clarity of processes and procedures in order to adhere to the requirements of the Regulator and the national legislative and policy framework, and was rejected for this reason.

19. DATA PROTECTION IMPLICATIONS

- 19.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

NO

- 19.2 **HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

NO

A DPIA has not been completed, because the Policy proposed does not involve or relate to the processing of any personal data.

Approved by Ozay Ali, Interim Director of Homes and Social Investment

CONTACT OFFICER:

Caroline Toogood, Head of Strategic Projects
(Growth and Housing),
caroline.toogood@croydon.gov.uk

APPENDICES: Appendix 1 – Policy for Rent-Setting for Council Homes within the Housing Revenue Account

BACKGROUND DOCUMENTS: None

POLICY FOR RENT-SETTING FOR COUNCIL HOMES WITHIN THE HOUSING REVENUE ACCOUNT

Adopted on: / /2021

To be reviewed at a minum every 5 years, or when appropriate as required.

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1. Aims and objectives

- 1.1 This policy is designed to set out Croydon Council's (LBC) approach to rent-setting across its rented homes, within the Housing Revenue Account (HRA). LBC will ensure that it meets the requirements set out in the revised Rent Standard, which was issued by the Regulator of Social Housing (RSH) as directed by the Government and came into effect on 1 April 2020. We must ensure that we understand and follow the requirements of the RSH Rent Standard while ensuring affordability for our tenants and maximising income.
- 1.2 Failure to set rents correctly would put LBC at risk of non-compliance with rent and data quality requirements as set out by the RSH, and impact on our ability recover rents and to maximise income, putting the services we provide to our residents at risk. We could also be at risk of breach of contract for non-compliance with the requirements of existing tenancy agreements.

2. References

- 2.1 The [Direction on the Rent Standard 2019](#) ("the Direction") was issued by the Secretary of State in February 2019 and required the RSH to comply with the Policy Statement on Rents.
- 2.2 The [Policy Statement on Rents for Social Housing](#) ("the Policy Statement"), was published by the Ministry of Housing, Communities & Local Government (MHCLG) in February 2019 and sets out the Government's policy on rents for social housing.
- 2.3 The [Rent Standard](#), introduced by the RSH in April 2020, applies to all RP and Local Authority low-cost social rental accommodation. It allows rents to be increased annually up to the Consumer Price Index (CPI) measure of inflation, plus 1%. CPI is based on the September of the previous year.
- 2.4 [Setting rents for social housing – addendum to the Sector Risk Profile 2019](#) was issued by the RSH in March 2020 to supplement the [2019 Sector Risk Profile](#) report and sets out what the sector can expect with regard to the regulation of rent requirements in future.

3. Purpose and scope

- 3.1 LBC is committed to providing rented housing at genuinely affordable rents. This policy aims to assist in setting rent for Social Rent properties which are owned and managed by LBC within the Council's Housing Revenue Account and will normally be reviewed every five years to ensure compliance with the latest legal and regulatory requirements, or amended if appropriate.
- 3.2 This Policy aims to ensure current and future rents are set at levels which maintain the financial viability of the HRA, allow continual service improvement, are fair and affordable for all residents, and are compliant with statutory and

regulatory requirements. For homes where rents can increase, this will take annually every April.

- 3.3 This policy applies to 13,422 homes currently within the Council's HRA, and any new homes purchased by or developed within the HRA for Social Rent or London Affordable Rent (see definitions below).
- 3.4 This policy does not provide information or guidance regarding rents for other uses such as garages, parking spaces or caravan plots, and it does not provide information or guidance regarding service charges.
- 3.5 Any changes to rent levels will be communicated to residents clearly and in a timely fashion. Any rent increases will be explained to tenants in full and support will be provided to address any concerns or questions that they may have.

4. Legal and Regulatory Framework

- 4.1 The affordability of rents is one of the fundamental benefits of social housing and setting social housing rents in line with legislation and Government policy is an essential requirement for a Registered Provider (RP) such as the Council.
- 4.2 The RSH's published regulatory standards set out the outcomes that RPs are expected to achieve - they are set out in a regulatory framework and are classified as either 'economic' or 'consumer' standards. The revised Rent Standard, (which is an economic standard) came into effect on 1 April 2020.
- 4.3 The Rent Standard requires that RPs charge rents in accordance with the Government's direction to the RSH, and in accordance with the Government's Policy Statement on Rents for Social Housing. The key elements of compliance with the Rent Standard include:
 - 2020 limit on rents
 - Guidance on social rents
 - Guidance on affordable rents
 - Specific expectations
 - Moving between types of rent
- 4.4 As a Landlord, LBC is obliged to comply with the contractual arrangements detailed in its tenancy and leasehold agreements which specify initial rental charges and the mechanism for staging rental changes in accordance with Sections 13 and 14 of the Housing Acts 1988 (Assured Tenancies) and Housing Act 1985 (Secure Tenancies).
- 4.5 The Welfare Reform and Work Act 2016 required RPs to reduce social housing rents by 1% per year for four years from 2016/17 (the 'social rent reduction'). This legislative requirement has now been replaced as directed by Government, as reflected in the new Rent Standard published in line with the MHCLG Policy Statement.

5. Definitions

- 5.1 **Social housing** is low cost rental accommodation as defined in section 69 of the Housing and Regeneration Act 2008. Social housing is let at a **Social Rent**, (also often known as formula rent or target rent) which is based on a calculation derived from 'formula' set by government and is substantially lower than equivalent market rent (exclusive of service charges), or at an **Affordable Rent** which is set at up to 80% of the equivalent local market rent, and is inclusive of service charges. Properties are not permitted to be converted to another rent type, even on re-let.
- 5.2 **Formula Rent** (Social Rent) is calculated by using 30% of the property's relative value (based back to 1999), 70% of the relative local income levels (based back to 1999) and applying a weighting based on the number of bedrooms so that smaller properties will have lower rents. Information on how to apply the calculations is set out in the Policy Statement.
- 5.3 **Affordable Rent** can only be charged where a property has been provided under an agreed housing supply delivery agreement between the Council and the GLA, or an agreement between the Council and the Secretary of State. Existing Affordable Rent homes within the Council's HRA have rents set at a level no more than 65% of the Local Housing Allowance (LHA) level (inclusive of service charges). No Affordable Rent can be set higher than the Local Housing Allowance (LHA) which is the maximum amount of housing benefit available for a property of that size (in terms of bedroom numbers) in Croydon.
- 5.4 **London Affordable Rent** (LAR) is a rental product specific to the London area governed by the Greater London Authority, with rents set at lower than typical Affordable Rent levels but higher than typical Croydon Social Rents, capped at 'benchmark' formula rent cap levels. More detail on LAR levels is provided in the GLA's [Affordable Housing Programme Funding Guidance](#). LAR is viewed by the GLA as an Affordable Rent product for legal and regulatory purposes.
- 5.5 **Rent Flexibility Level** allows RPs to have some discretion over the Social Rent set for individual properties, taking into account local factors. This allows RPs to set rents at up to 5% above formula rent (10% for supported housing) if there is clear rationale for doing so.

6 Rent Policy Background

- 6.1 Since 2001, the majority of rented social housing properties have been let at Social Rents, calculated using a formula set by Government that included assessment of the relative property value, relative local earnings and a weighting for the number of bedrooms (see appendix A). This formula-based approach was intended to ensure that similar social rents were charged for similar properties within a local area. The property valuation used to initially set the rent must be appraised in accordance with the Royal Institute of Chartered Surveyors (RICS) 'Red Book' methodology.
- 6.2 In 2011, the government introduced the new 'Affordable Rent' tenure which allows rents (inclusive of service charges) to be set at up to 80% of market rent levels. The introduction of Affordable Rent was intended to improve the viability

of social housing organisations and encourage the development of new homes. The Council has previously developed/purchased 95 new homes for Affordable Rent, but hasn't converted any existing Social Rented properties to Affordable Rent. No further conversions from existing Social Rent homes to Affordable Rent tenure are allowed under the current regulatory regime.

- 6.3 The Welfare Reform and Work Act 2016 introduced a new rent regime for social landlords from 1 April 2016. The Act introduced a 1% rent reduction for existing tenants in social and affordable housing for four years from 2016. This was intended to help reduce national welfare spending, and reduce costs for tenants paying all or part of their rent.
- 6.4 In October 2017, the government announced a new rent policy for a period of least five years, replacing the previous legislative requirements. The new Rent Standard allows yearly increases of up to CPI plus 1% for Social and Affordable Rent properties from April 2020. This took effect for Croydon Council HRA homes from April 2020.
- 6.5 The current GLA Affordable Housing Programme (2016-21) allows for the development of new homes funded by the GLA for letting at or below LAR levels (the benchmark values as described above). The next GLA Affordable Housing Programme (2021-2026) removes this tenure, and the GLA are proposing to only fund the development of new homes for Social Rent (along with the intermediate products London Living Rent and Shared Ownership).

7. Setting rents

- 7.1 Existing Social Housing rents will increase by CPI plus 1% every April. All tenants are entitled to four weeks' notice of a change to their rent. The council charges rent for 50 weeks of the year, so all rent figures will be calculated correctly to ensure the annual figures are appropriately presented pro-rata.
- 7.2 Council homes will have their rent level re-valued and updated whenever they become void, prior to re-letting. Occasional rent corrections will be made where the Council's rent-setting team identify errors in rent calculations, and tenants will be informed with appropriate notice.
- 7.3 General needs Social Rent levels are restricted by a Rent Cap set out in the Policy Statement to ensure affordability. Where a formula rent would be higher than the rent cap for a particular size of property, then the capped rent level must be used instead. The rent caps are increased each April by CPI (at September of the previous year) plus 1.5%. When a property that has been subject to the rent cap is re-let and the formula rent remains above the rent cap, the rent can be reset at the rent cap level, which will have increased each year by CPI +1.5%, rather than CPI +1%.
- 7.4 The LAR benchmark rents are set out in the [GLA Affordable Homes Programme Capital Funding Guide \(2016-21\)](#). The table below sets out the current LAR benchmark levels.

Bedrooms	LAR 2020-21 per week
Bedsits, Studios & 1	£157.46
2	£166.70
3	£175.97
4	£185.23
5	£194.48
6	£203.74

- 7.5 New general needs homes acquired by or developed for the HRA for Social Rent will have rents set in line with the national formula as set out in the Policy Statement. The current property value will be assessed by an independent valuer following the RICS 'red book' guidance and the Council's rent-setting team will use the Nationwide House Price Index Calculator to index back to an equivalent property value in 1999, for use in the Social Rent setting formula. The year 1999 local earnings data for use in the Social Rent formula is provided by the Office for National Statistics 1997-99 New Earnings Survey, uprated to 1999 price.
- 7.6 See appendix A for guidance regarding the process for setting formula rents, uprating to 1999 values and rent caps.
- 8. Equality & Diversity**
- 8.1 This policy will be implemented in accordance with LBC's existing Equality and Diversity Policies.
- 9. Monitoring and Implementation**
- 9.1 Rent levels and service charges will be monitored and compared across the areas where the Council holds housing stock. A summary of these charges will be reported in the annual HRA budget report submitted to Croydon's Tenant and Leaseholder Panel for review.
- 9.2 Assessment of the Council's overall HRA rental portfolio and its viability is undertaken by the Council's external consultants managing the HRA Business Plan (currently Savills).
- 9.3 The Housing Business Systems team oversee the operational delivery of the Rent Setting Policy, with rent-setting for individual properties undertaken by the Housing Income Control Manager.
- 9.4 Rents will be reported to the RSH through the annual regulatory Statistical Data Return submission.

Appendix A:

Information for calculating formula rents

This appendix provides the information, apart from property-specific details, that is needed to calculate formula rents.

1. The formula rent for a property is calculated using the following approach:

Weekly formula rent is equal to:	
	70% of the national average rent Multiplied by relative county earnings Multiplied by the bedroom weight
Plus	30% of the national average rent Multiplied by relative property value

- National average rent means the national (England) average rent in April 2000. This is £54.62.
- Relative county earnings means the average manual earnings for the county in which the property is located (for Croydon, this is Greater London: £354.10 per week) divided by national average manual earnings (£316.40 per week). These are both at 1999 levels.
- Relative property value means an individual property's value divided by the national (England) average property value (£49,750), as at January 1999 prices.
- The following bedroom weights must be used in the formula:

Number of bedrooms	Bedroom weight
0 (i.e. bedsits)	0.80
1	0.90
2	1.00
3	1.10
4	1.20
5	1.30
6 or more	1.40

2. Up-rating to current rent levels

Once a formula rent for 2000-01 has been calculated, it must be adjusted for each year using the following a two step process set out in Appendix A of the [Policy Statement](#). This allows for annual inflationary/deflationary changes up until 2019-20 and then inflation by CPI + 1%, including allowing for the four year rent reduction period required by the Welfare Reform and Work Act 2016. The

following table should be used for the uprating to 2019-20 (excluding properties excluded from the social rent requirements of the 2016 Act):

Year	Inflation	Additional	Total
2001-02	3.3%	1.0%	4.3%
2002-03	1.7%	0.5%	2.2%
2003-04	1.7%	0.5%	2.2%
2004-05	2.8%	0.5%	3.3%
2005-06	3.1%	0.5%	3.6%
2006-07	2.7%	0.5%	3.2%
2007-08	3.6%	0.5%	4.1%
2008-09	3.9%	0.5%	4.4%
2009-10	5.0%	0.5%	5.5%
2010-11	-1.4%	0.5%	-0.9%
2011-12	4.6%	0.5%	5.1%
2012-13	5.6%	0.5%	6.1%
2013-14	2.6%	0.5%	3.1%
2014-15	3.2%	0.5%	3.7%
2015-16	1.2%	1%	2.2%
2016-17	N/A	N/A	-1.0%
2017-18	N/A	N/A	-1.0%
2018-19	N/A	N/A	-1.0%
2019-20	N/A	N/A	-1.0%

3. Rent caps

Formula rent caps for 2019-20 are as outlined in the following table:

Number of bedrooms	Rent cap
1 and bedsits	£141.43
2	£149.74
3	£158.06
4	£166.37
5	£174.69
6 or more	£183.00

From 2020-21, rent caps will increase by CPI (at September of the previous year) + 1.5 percentage points, each year.

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For General Release

REPORT TO:	CABINET 18th February 2021 COUNCIL 29th March 2021
SUBJECT:	Review of Brick by Brick Croydon Ltd Brick by Brick Shareholder decision - the future of the company
LEAD OFFICER:	Katherine Kerswell – Interim Chief Executive Chris Buss- Consultant
CABINET MEMBER:	Leader of the Council Councillor Hamida Ali
CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON This report arises from the decisions of the meetings of Cabinet on November 25 th and Full Council on November 30 th regarding the initial review of Brick by Brick and other subsidiary and investment arrangements. This further report reviews options for the future of Brick by Brick and outlines alternative arrangements to be considered for the delivery of social housing by the Council	

FINANCIAL IMPACT

This report considers the options for the future of Brick by Brick and recommends a limited build out option. This option involves allowing Brick by Brick to continue building out schemes currently on site and due to complete by October 2021, market sites for disposal where completion dates are longer, and review sites no longer proposed for development. This option is to be considered in conjunction with a potential sale of the business.

The Council has a significant financial exposure with Brick by Brick through provision of over £200m in development loans including interest and therefore the options will each give the Council varying degree of risk and reward, which is further detailed within section 6 of the report. The recommended option results in Brick by Brick delaying repayment of the existing loans and potential further funding of no more than £9.99m, if required.

FORWARD PLAN KEY DECISION REFERENCE NO.: 0621CAB

The notice of the decision will specify that the decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee.

1. CABINET RECOMMENDATIONS

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

Cabinet is recommended to:

- 1.1 Consider the PwC report including recommendations at Appendix 1 of the Part B agenda and the options set out in this report; agree to proceed with the option set out as scenario 2 of that report, which is a build out of sites by Brick by Brick combined with a sale of sites under construction whilst still considering the option of a sale of the business, with a further report to Cabinet in April / May 2021.
 - i. Note that, with any option, there will be further costs/resourcing (in particular the sale of the business option, in order to ensure the proper advice is obtained regarding valuation, legal and financial implications) and some write off of the Council's investment (as further explained in the Part B report)
- 1.2 Agree that revised funding arrangements be entered into with Brick by Brick to reflect the current loan positions and proposals for the future, including, where relevant, moving to a 100% debt funding position (as opposed to 25% equity and 75% debt); extending relevant loans and repayment periods; allowing delays with repayments of existing loans; agreeing to further funding of no more than £9.99 million in relation to sites proposed for Brick by Brick to continue developing (and only where absolutely necessary within an appropriate repayment period), and:
 - i. Agree that the Interim Chief Executive be given delegated authority to finalise and agree the terms of new/varied funding agreements to be entered into between the Council and Brick by Brick in consultation with the Section 151 Officer and Monitoring Officer and in consultation with the Leader, Deputy Leader and Cabinet Member for Resources and Financial Governance.
 - ii. Note the progress of the loan agreement review (recommendation 19 of the Report in the Public Interest), as detailed in paragraphs 3.13-3.15 of this report.
 - iii. Note the advice at paragraph within the Part B paper regarding the legal implications of these proposed revised funding arrangements
 - iv. Agree, where practically possible, to apply all funds being received from Brick by Brick first to the accrued interest and any subsequent funding will be used to pay back the principle loans
- 1.3 Agree for the necessary steps to be taken, in accordance with the Council's Tenders and Contracts Regulations, to appoint marketing agents to consider the disposal options for the College Green site (note, this is the site adjacent to Fairfield Halls which was due to transfer to Brick by Brick, but is currently held by the Council); the outcome of this options appraisal shall be reported back to Cabinet in accordance with the Council's governance processes.
- 1.4 Agree for the Council to review those sites Brick by Brick propose not to develop, as identified in Appendix 4, and to receive a future report to Cabinet on the potential use and future of each site (note, these are sites that had originally been intended to be transferred to Brick by Brick but are still held by the Council).
- 1.5 Agree that the plans to transfer the four sites identified in Appendix 4 from the Council to Brick by Brick proceed and, note, these sites will then be dealt with in

accordance with recommendation 1.9 below.

- 1.6 Approve that the Council's Housing Revenue Account (HRA) can acquire residential units from Brick by Brick as part of this review and note that the concurrent report to Cabinet regarding the arrangements for the future development of social housing within the Housing Revenue Account business plan will include Brick By Brick developments sites as potential development options. The acquisition and development will be subject to a review of affordability and HRA revenue implications.

The Cabinet, on behalf of the Council, exercising its functions as sole shareholder of Brick By Brick Croydon Ltd, is recommended to:

- 1.7 Agree that Brick by Brick continue to build out those schemes currently on site and due to complete by October 2021 (as identified in Appendix 2)
- 1.8 Agree that, in the event risks arise which affect timely completion of those sites referred to in Recommendation 1.7, agree that:
- i. Brick by Brick shall report to the Council's Interim Chief Executive regarding those risks, including any development, operational, legal or other risks;
 - ii. The Council's Interim Chief Executive, in consultation with the Section 151 Officer and Leader, be authorised to decide:
 - a. whether the risks are such that selling the site(s) urgently would be more economically advantageous and, in those circumstances, shall have the ability to authorise Brick by Brick to sell those relevant sites; or
 - b. whether a further review is to be carried out and reported to Cabinet for a decision.
- 1.9 Agree that, for those sites which have estimated completion dates beyond October 2021 (as identified in Appendix 2), Brick by Brick be authorised to:
- i. market the sites for sale and report back to the Council's Interim Chief Executive and Section 151 Officer regarding offers received;
 - ii. Subject to any objection by the Council's Interim Chief Executive in consultation with the Section 151 Officer and the Leader (note, this is to allow the Council the opportunity to consider whether continued build out of these sites might be more cost effective than offers received), sell those sites and, where necessary, novate any relevant contracts, such as building contracts, to the purchasers (for the avoidance of doubt, should the Council's Interim Chief Executive object, Brick by Brick shall not have the shareholder's authority to sell those sites).
- 1.10 Agree with the recommendation of the board of Brick by Brick to depart from the current Business Plan and no longer develop any site other than those sites identified in Appendix 2 (note, potential future transfers of interests in the work already undertaken will be the subject of a future report to Cabinet in accordance with recommendation 1.5 above).
- 1.11 Agree that these recommendations be adopted by way of shareholder resolution as revisions to the Business Plan of Brick by Brick Croydon Ltd, thereby requiring the company and Directors of the company to act on these

recommendations and to carry out all necessary actions to give effect to them.

- 1.12 Require the Board of Brick by Brick to prepare and submit a revised Business Plan (by no later than May Cabinet) for adoption by the Council as shareholder, reflecting the decisions made under this report and to include the consequential impact on staffing and other relevant matters.

COUNCIL RECOMMENDATIONS

- 1.13 The Council is asked to note the recommendations set out above, which are to be considered by Cabinet on 18 February 2021 and that Council shall receive a verbal update in respect of the outcome.

2. EXECUTIVE SUMMARY

- 2.1 This purpose of this report is to receive and note the reported outcomes of the second stage of the strategic review with particular regard to the future activities of Brick by Brick. The review concludes that, in order to minimise the risk exposure to the Council and thus minimise the future losses to the Council, a decision on the future operation of Brick by Brick should be taken. This report outlines the options for Cabinet to consider in regard to the future of the company (and therefore changes to its Business Plan).
- 2.2 The options contained in this report specifically address the sites that have been transferred to Brick by Brick or are also under contract and those which have not yet commenced and considers whether they should be built out by Brick by Brick and possibly sold on with novated contracts at a later date .
- 2.3 The report recommends that the Council undertakes a review of those sites not yet transferred to Brick by Brick (and as such not being built out by Brick by Brick) to determine their future use, including whether some of the sites should be retained for the provision of new build social housing by the Council within the Housing Revenue account.
- 2.4 The impact of a decision to proceed with the recommendations in this report on Brick by Brick means that the organisation will be in a run down situation whilst sites are completed or disposed of. This will impact staffing within Brick by Brick as the level of work diminishes.
- 2.5 The report also recommends that, in parallel with the above that a sale for the Company should be considered and a final decision on sale or build out be made at a future meeting of the Cabinet.

3. THE REVIEW

Background

- 3.1 The Cabinet at its meeting on 25th November 2020, received a report on a strategic review by PwC of the Council's group of companies and other entities.

As a result of that review a number of specific recommendations were made concerning Brick by Brick.

These were to:

- i) Authorise the initial further work required on the options identified by PWC regarding the Council's interest in Brick by Brick in order to best inform further consideration and decision at the January Cabinet meeting.
- ii) Agree that funding of Brick by Brick shall continue in line with current loan arrangements and conditions subject to that further decision, provided that all funding for construction, and completed unit purchases be reviewed on a site by site basis.
- iii) Agree that all site transfers to Brick by Brick, be halted until the Council has completed the options appraisal and taken a final decision on the options.

The level of work required as part of the second stage review was such that meeting the January report date was not practicable and it was agreed to move to the February Cabinet meeting. This was reported to the Scrutiny and Overview Committee at its meeting on December 21st 2020.

3.2 The Council has also received and agreed a number of recommendations regarding Brick by Brick in the Report in the Public Interest report by Grant Thornton. In particular that report contained four specific recommendations regarding the Council's future relationship with Brick by Brick. These were –

- i) The Cabinet and Council should reconsider the financial business case for continuing to invest in Brick by Brick before agreeing any further borrowing.
- ii) The Cabinet and Council should review and reconsider the ongoing financial rationale for the Council in the equity investment arrangement with Brick by Brick.
- iii) The s151 officer and monitoring officer should monitor compliance with loan covenants with Brick by Brick and report any breaches to Members.
- iv) The Cabinet and Council should review its arrangements to govern its interest in subsidiaries, how the subsidiaries are linked, the long-term impact of the subsidiaries on the Council's financial position and how the Council's and taxpayers interest is safeguarded.

These issues with regard to the Council's financial position are addressed in respect of Brick By Brick in this report (the wider governance considerations referred to at iv above are ongoing).

- 3.3 The initial strategic review commissioned by the September 2020 Cabinet covered a wide range of actions concerning not only Brick by Brick, but also Croydon Affordable Homes LLP and its group companies, Growth Zone, Revolving Investment Fund and Asset Investment Fund.

The resulting action plan was reported to the Scrutiny and Overview Committee on December 21st 2020, whose comments then were reported to Cabinet on 18th January. The action plan will be monitored under corporate arrangements as part of the Croydon Renewal Improvement Plan and, except where it specifically relates to the future options for Brick by Brick, is not referenced in this report.

Risk Appetite

- 3.4 Before examining the options available to the Council in regard to the future of Brick by Brick, it is essential that the Cabinet considers its current appetite for risk on investment activity with particular regard to the financial position that it finds itself in – i.e. a S114 notice and December 2020 submission to MHCLG for a capitalisation direction (loan) of £150m over 2020 - 2024.

When the Council set up Brick by Brick, there was limited regard evidenced in the Cabinet papers at the time of the potential downsides from investing through a wholly owned housing subsidiary and the risk to returns to the Council within a set period.

The emphasis in reporting the arrangements at that time was on the potential positives arising from the establishment of Brick by Brick with limited assessments of the risks potentially involved. The impact of that approach has in part led to the financial position that the Council now finds itself in. The Council now has significantly less scope for adopting investment proposals where an element of risk may lead to greater reward. The contrary argument applies that the greater risk may also lead to greater losses, so this is something the Council in its current financial position cannot afford to do.

This constrains some of the options available on the future of Brick by Brick, as albeit some of those options have a potentially greater reward, they also have a higher element of downside risk which could lead to increased losses.

In the light of this, the examination of the options has concentrated on where the Council can have greater certainty of outcome both in terms of future costs but also in terms of future income. The recommendations to Cabinet reflect this risk appetite.

Examining the Options

- 3.5 The November Cabinet report, stated that there were a range of options available to the Council ranging from closing Brick by Brick, to building out schemes on site, to selling off the business or maintaining the company and continuing the business as usual.

In order to inform the second stage of the report, the Cabinet agreed to procure assistance from a local firm of cost consultants (FFT) who examined a number of existing Brick by Brick schemes to gain a view as to the likely level of build

costs on a range of their schemes, likely completion dates and indicative cash flows. Separately, valuation advice has been obtained on indicative sales figures for the same schemes.

These have been checked against information from Brick by Brick and then modelled by PwC to produce, in the absence of reliable cash flow data from Brick by Brick, some indicative cash flows for the immediate future to give some indication on two issues which are central to the consideration of future options for the company. Those two issues being:

- (i) When the Council might start to receive repayment of some of its investment in Brick by Brick?

and

- (ii) Whether the Council would need to make any short term cash injections to ensure that Brick by Brick remains solvent?

The resultant PwC report with recommendations is attached as Appendix 1 (but to the confidential part of the agenda only)

- 3.6 Before considering the benefits and disbenefits of the various options, it is important to note the stages of development of the various schemes undertaken by Brick by Brick. As at 1st January 2021, Brick by Brick had 29 schemes on sites transferred or under contract with 931 homes being built or completed awaiting disposal (i.e. awaiting sale to members of the public, RSL's or the Council).

Of that number 429 homes are likely to be completed by the end of October 2021, of the remaining 502 homes, completion is estimated to be concluded by Mid 2023

The list of schemes included in the above totals are shown in Appendix 2 and includes some sites where contracts have been let but part or all of the site hasn't been transferred to Brick by Brick or there are other issues to be resolved.

The latter schemes could be terminated and are referred to in Part B of this agenda.

It is assumed that for those schemes where a contractual commitment has **not** yet been made by Brick by Brick and where the land has **not** been transferred, development works will **not** be commenced and the potential future of these sites is referred to later in this paper. This is in accordance with the decision taken by Cabinet on 25th November 2020.

- 3.7 The benefits and disbenefits of the options outlined in the original PwC report are set out in Appendix 3.

Some of the options such as immediate closure, management buy out or "business as usual" are non-viable, due either to the size of the loss for the Council that would be incurred or the lack of substantive funding from the

Council to fund open-ended ongoing business other than for the immediate future.

The other options which involve either build out of sites, starting new sites or sale of the business all have an element of risk in terms of both valuation and cost uncertainty. This makes them potentially unpalatable options to the Council as the extensive build out would involve the Council entering into further General fund borrowing which would place additional pressures on the revenue budget without a guarantee of return.

The level of cost uncertainty and valuation assumptions are in the paper within the Part B of this agenda.

The decision as to which option to follow has been further narrowed by the proposal by the board of Brick by Brick not to build out 40 sites, which were under previous arrangements due to be transferred from the Council to Brick by Brick. This leaves the Council with the limited build out option of those 29 sites either transferred or under contract. Or a possible sale of the business based on the purchaser acquiring the Company which would include the ability to buildout the 29 sites in line with the existing planning consents.

This limited build out option (Scenario 1 in the Part B agenda) has merit as a considerable number of the sites are due to completed by the end of 2021 meaning that the Council is able to determine, with a degree of accuracy, the level of costs and income accruing to Brick by Brick and thus any residual income returning to the Council. It should be noted that Covid 19 restrictions could adversely impact completion dates and thus sales income as well potentially increasing costs.

- 3.8 However, the Scenario 1 option is not without issues as to build out all the sites, including some of the larger sites, means that Brick By Brick would have to continue as a trading entity to the end of this and the next financial year and into 2023/4. This has a number of inherent risks both in terms of cost and value but also in the practicality of keeping the company operational whilst it goes through what would, in effect, be a managed wind down.

A variant option (Scenario 2) has therefore been considered of a disposal and novation of some of the building contracts that would reduce Brick by Brick's, and thus the Council's, exposure to ongoing liabilities. This would involve the build out of the sites whilst purchasers were found for those sites that are not due to complete by October 2021. For Scenario 2 to be successful there would need to be a successful purchase arrangement from one or more bidders for the sites. On balance, this could be seen as a less risky alternative than a managed wind down and long build out and, as such, it may be more likely to maximise value to the Council. A sale to a single bidder could also involve the transfer of some Brick by Brick staff under the TUPE regulations.

- 3.9 Scenario 2 would require the full co-operation and agreement of Brick by Brick, initial discussions with the directors of Brick by Brick have been supportive of this approach. The arrangements, as set out in the Articles of Association and shareholder reserved matters, are that asset disposal would normally be a matter for Brick by Brick to determine where this is in line with the Cabinet

approved business plan. The current business plan does not envisage this course of action and under the shareholder reserved matters this becomes a shareholder decision until such time as it is incorporated into an approved business plan.

In the light of this, Cabinet (if this option is agreed) would need to exercise its functions as shareholder to instruct and authorise the directors of Brick by Brick to commence a marketing exercise to sell onto other developers those sites that are not due to complete by the end of 2021.

The results of that exercise would then need to be reported back to the Council in order to allow the Council the opportunity to consider whether continued development of the site through Brick by Brick or the Council would be more cost effective than any offers received. The Council would then need to confirm whether they object to any disposal of the sites.

This disposal process would likely require decisions to be made swiftly and within timescales outside the normal Cabinet meeting timetable. It is therefore further recommended that, in order to ensure disposals are not jeopardised, decisions on whether to object to a disposal be made by the Interim Chief Executive in consultation with the section 151 officer and the Leader and subsequently be reported to Cabinet.

- 3.10 The decision to build out existing sites substantially under construction still has risk as Brick by Brick will effectively be in a “managed run down” situation and key staff may decide to leave, making it more difficult to manage the completion on site of those schemes. The Council and the board of Brick by Brick will therefore need to carefully monitor the situation and make arrangements to ensure that quick and speedy decisions can be made in order to minimise the Council’s exposure to additional financial risk. This may include authorising the board to dispose of further sites (other than those that are due to complete after October 2021) outside of the current authorised business plan, in circumstances where that is the most economically advantageous situation for the Council. In this case, again due to the likely need for emergency or expeditious action, it is recommended that the matter be delegated to the Interim Chief Executive in consultation with the Section 151 Officer and the Leader and subsequently be reported to Cabinet.
- 3.11 The Council would normally expect to receive and consider a business plan for approval from Brick by Brick at this time for operations in 2021/22. Whilst the strategic review has been undertaken, Brick by Brick have not been able to undertake work on a business plan. Even in the circumstances set out in this report and in accordance with the Articles for Association, a Brick by Brick business plan is still required and will need to include the arrangements set out in this report, in particular the arrangements for disposal of sites and the consequential impact on staffing and other related matters. This will be reported to a future meeting of Cabinet (by no later than May).
- 3.12 The other potentially viable option as set out in the Part B agenda could be a sale of the whole business to a third party. This option is under the PwC analysis potentially beneficial to the Council and would be at the choice of the Council not Brick by Brick. The initial view in November was that this option

would both be time consuming and unlikely to be attractive to the market if the Council went into an open market situation. However, an off market sale would be less time consuming and could potentially generate a better outcome financially than the build out option. The Council has had one approach from an interested party and it is suggested that this be followed up to see on what terms a disposal might be possible and to compare those terms with the two scenarios contained in this paper. It should be noted that in the sale option and both of the scenarios the expectation is that the sites will be developed in terms of the mix of properties between private sale and affordable units (both social housing and shared ownership) contained in the planning consent. As explained in the Part B paper the Council would need to undertake due diligence on this offer. Please note the further resourcing required, as set out in section 6.

Other issues

- 3.13 **Funding Agreements**-The Council has as at 31st December 2020 lent £196,287,521 to Brick By Brick. This excludes accrued interest of £27,300,023 that will be accrued by the end of the 20/21. A significant proportion of this sum, as identified in the original strategic review report, is in loans that are either time expired or not fully documented. As identified in both the strategic review report and the report in the public interest, these agreements need to be regularised. The original agreements were on the basis that loans effectively made up 75% of the value of the cash to be paid over to Brick by Brick with the remaining 25% being equity. The Council has never made any equity payments and is now not in a financial position to do so. The original loan agreements also specified that any sales proceeds from properties sold by Brick by Brick are placed in an account for the Council to apply to interest repayment and, if there is any excess, to substantive loan repayment. This process hasn't happened and sale proceeds have remained with Brick by Brick, in effect acting as working Capital replacing the Council's equity share. The Council needs to either regularise this arrangement, make variations to the current agreements or replace it with either fresh loans or equity.
- 3.14 The option of inserting equity is not feasible in the Council's current financial predicament and raising fresh loans would in effect only recycle the sales proceeds. However, the present arrangement as set out in the loan agreements, if properly exercised, does give the Council control and it is therefore recommended that the current arrangements continue but in a modified way to give Brick by Brick capacity to have working capital to ensure that funds are available to build out units on site. It should be noted that the PwC analysis assumes that sale proceeds are recycled to Brick by Brick until there is positive cash flow. There is a minimal requirement based on the PwC modelling below £10 million, which is supported by cash flow modelling from Brick by Brick and, as such, Cabinet is recommended to agree this further funding to Brick By Brick in relation to schemes proposed to continue with development (recommendation 1.2).
- 3.15 All of the loan agreements will need to be restructured or revised to cover the fact that there is now no equity input and the arrangements for working capital are covered as set out above. Discussions with the Council's legal advisors are ongoing as to whether this is best undertaken through a single overarching

agreement or a series of site specific agreements with one to cover working capital. In any event, identified breaches explained above will be formally documented and addressed in accordance with recommendation 19 of the Report in the Public Interest. It is therefore recommended that decisions regarding any revision of the loan arrangements be delegated to the Interim Chief Executive in consultation with the Section 151 Officer and Monitoring Officer, the Leader, Deputy Leader and the Cabinet Member for Resources and Financial Governance. (as set out in recommendation 1.2).

3.16 Fairfield Halls and the College Green site

The refurbishment of Fairfield Halls was undertaken under license by Brick by Brick, as per the June 2016 decision of Cabinet. The initial intention was that these works would be at nil cost to the Council as the costs would be recovered by Brick by Brick from the profits on the sale of housing units from the adjacent College Green site. The Council has not, however, formally transferred the adjacent site to Brick by Brick. The arrangements concerning the governance and funding of this scheme are currently subject to a separate value for money investigation being undertaken by Grant Thornton as reported to members at the Scrutiny and Overview Committee in December 2020. The Council has, to date, lent in excess of £59 million to Brick by Brick to cover both the refurbishment of the halls and the planning costs of the adjacent site.

- 3.17 The estimated costs and values of developing the consented scheme on the College Green site have been checked by appointed consultants and officers are of the view that there is a viable scheme. However, the scheme will not generate sufficient resources to pay back the loan to date on the refurbishment and would require additional significant equity or loan amounts in excess of the current loan if the Council were to continue to undertake the scheme via Brick by Brick.

In addition, the Council would vicariously have both cost and value risk on a scheme that will take a number of years to complete. In the light of this risk and the additional short term borrowing involved, it is recommended that the College Green scheme, including elements of the adjacent car park, is not progressed by Brick by Brick. It is also recommended that the Council undertake a procurement exercise (in accordance with the Council's Tenders and Contracts Regulations) to appoint marketing agents to report back to Cabinet on the best options for the disposal of the College Green site, including the adjacent car park (recommendation 1.4). This further report will also take cognisance of the findings of the Grant Thornton value for money review.

- 3.18 Future of sites not transferred to Brick by Brick.** There are four sites where the Council has not yet transferred land where Brick by Brick have either commenced work on site or have effectively entered into a contract to commence building. These sites are detailed on the Part B paper. As part of the detailed analysis, it is recommended that the previous plans to transfer these sites to Brick By Brick continue and then be included in the marketing exercise referred to in para 3.9, which would then potentially be transferred to any eventual developer.

- 3.19 The Council has previously agreed to transfer a number of sites to Brick by Brick. These sites are at various stages in the planning process ranging from

feasibility, through to obtaining planning consent. The known list of sites which were previously agreed to transfer are detailed in Appendix 4. This list may be incomplete .

The Council has lent £1,371 million to Brick by Brick in specific loans developing these sites, and part of the £35.265 million on development cost loans will also be attributable to these sites. There is potential to either sell on the sites or develop these for social housing within the Housing Revenue Account (although, at present, the value of this work is unquantifiable). However, that value will accrue to the Council at some future stage and it will need to recognise that the loans made to Brick by Brick for this work will now, like those for Fairfield Halls, need to be treated as a potential bad debt.

With regard to the sites set out in Appendix 4, the Council will need to decide on a site by site basis whether to retain or dispose of the site or to follow through with planning consents to maximise potential value to the Council. It is therefore recommended that the sites identified in Appendix 4 be subject to a further report back to Cabinet on their future use (recommendation 1.5). It should be noted that a number of sites that currently have planning consents subject to confirmation of section 106 agreements are likely to lapse as they are close to being time expired and the consents may not now be in accordance with planning policy.

Resources will need to be identified from within the Council to undertake this work both from within the property services team as well as the planning service.

3.20 FUTURE DELIVERY OF SOCIAL HOUSING. Brick by Brick was originally set up to provide a vehicle by which the Council was able to meet housing demand, in particular affordable housing for rent at a time when there were constraints on the Council's ability to provide such housing through direct delivery via the Housing Revenue Account (HRA). The abolition of that constraint, namely the HRA borrowing cap in 2018, meant that the Council has, since 2018, been able to directly deliver new social housing subject to the constraint of affordability within the HRA.

3.21 The Council, however, chose to continue to deliver new social housing units through Brick by Brick. If the Council decides that it no longer wishes to deliver housing via Brick by Brick and it wishes to provide additional affordable rented accommodation through the HRA, it will need to establish processes to both identify schemes that are physically capable of being developed in planning and construction terms but are also financially viable, in that the rent charged covers the revenue costs of managing and maintaining the new stock as well as the cost of funding any borrowing.

It should be noted that a revised policy on rent setting across the new build units is considered elsewhere on this Cabinet agenda . That policy, if approved, will assist with scheme development viability, including those schemes which are potential acquisitions from Brick by Brick into the HRA. In the event that some of those schemes are not viable, even within the parameters of the proposed rent policy, the Council may have to return GLA grant and/or lose the ability to recycle Right To Buy (RTB) receipts within the required time limits.

- 3.22 A number of the sites in Appendix 4 could potentially fall into that category, particularly those that are currently on HRA land, utilising the existing work from Brick by Brick, high level appraisals will be undertaken on the delivery of social housing on those sites and reported back to Cabinet as part of the HRA Business Plan.
- 3.23 The Council has previously agreed to purchase a number of completed units for social housing purposes within the HRA. These purchases were put on hold as part of the November 2020 Cabinet report. These sites are indicated in Appendix 2 and could result in up to 187 additional social housing units . On a site by site basis, where units meet the revenue affordability criteria set out in para 3.21 (i.e. that rent covers operational and financing costs and that the price agreed for purchase is deemed to be at market levels) purchases will be confirmed with Brick by Brick and payment be made on completion . A number of the sites in the July 2020 paper were originally designated as shared ownership , it is possible that Brick by Brick may receive better financial offers in respect of these units as shared ownership units in that case it is possible that those sites will be sold as shared ownership units to a registered provider rather than as social housing to the Council.

4. CONSULTATION

- 4.1 No formal consultation has been made on this report, other than factual accuracy checks with external third parties. Consultation on the future use of sites will need to take place in line with the council's normal arrangements.

5. PRE-DECISION SCRUTINY

- 5.1 This report was submitted to the Scrutiny and Overview Committee for comment at its meeting on February 9th 2021.

6 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 6.1 This report considers the various proposals in regards to future operations of Brick by Brick. The recommended course of action involves allowing Brick by Brick to continue building out schemes at an advanced stage, reviewing sites no longer proposed for development, disposing of sites at intermediate stage or sell the shares of the Company. The impacts of each is described in Section 6.5 below.
- 6.2 The option to sale the business will be worked on in parallel to the other proposals. Whilst the sale option can be worked in parallel for some time, there will come a point when the Council will need to decide if it wants to continue with disposing of sites or sell the Business.
- 6.3 It is important to note that all funding provided by the Council has been provided through the Council taking on borrowing and then on lending this to Brick by Brick at a margin. The Council currently does not provide minimum

revenue provision (MRP) on its loans to Brick by Brick due to the short nature of the loan period. However, as part of the 2021/22 Budget Setting report and the Treasury Management Strategy (to be reported to Full Council on 8th March 2021) the Council will revise its policy to ensure the most prudent approach is taken on any funding provided to Brick by Brick.

- 6.4 **Option to continue development of schemes within the Brick by Brick with completion date of October 2021.** There are 20 schemes that are planned to continue within Brick by Brick (Appendix 2). In order to complete the schemes the current loan agreement will be extended and additional loan funding will be provided so that the Council now lends 100% of the development costs through debt financing. In order to lend the money to Brick by Brick the council will need to borrow the funds from Public Works Loan Board (PWLB) and on lend to Brick by Brick at a margin. This is recommended to be at a maximum of £9.99 million.
- 6.5 Whilst the Council does not have sighting of the scheme viability the expectation is that once these schemes are developed and the residential units sold, that will provide sufficient receipts to Brick by Brick to pay back the debt and interest income.
There is a risk that if Brick by Brick does not receive sufficient receipts from the disposal then the Council will not receive its funding back. This will require the Council write off the remaining loan balance and to carry cost of the loans.
- 6.6 **Option for Disposal of developments directly from Brick by Brick with completion date beyond October 2021.** There are 9 schemes (Appendix 2) that are planned to be disposed of by Brick by Brick. In this option the Council will not be providing further funding however once developments are disposed of by Brick by Brick it is expected that the company will use the receipts to pay back the outstanding loans. Should Brick by Brick not receive sufficient receipts from the disposals of its developments the Council will have to write off any outstanding loans balances and incur financing costs.
- 6.7 **Options for Disposal of College Green Site from the Council.** The Council has lent £1.7m to Brick by Brick to carry out various development works at the College Green Site. When the site has been disposed of the receipts will be used to payback the outstanding Brick by Brick loan regarding this site. As in the other two options the risk is that should sufficient receipts from the disposal not be realised the Council will have to carry the cost of financing the outstanding loan amount.
- 6.8 As the report indicates this option has inherent risks due to poor governance and funding arrangements and therefore detailed financial implications will be provided once the review from Grant Thornton has been completed.
- 6.9 **Option to Review remaining sites.** Financial implications will be explored once the review has been completed of the schemes identified in Appendix 4. If the proposal is to bring developments back into the Council then all loans related to those schemes may need to be written off in the first instance. This will create an ongoing financing charge, through provision of the MRP, until that debt can be paid back. The Council will need to carry out an accounting assessment and seek advice from Treasury advisors if sites are being passed

onto the HRA.

- 6.10 **Sale of the Company (Share Sale).** This option will require significant due diligence and assessment against other options detailed within 6.4 to 6.9, before a definite financial implication analysis can be provided. The final assessment will depend upon the offer from a potential bidder and how the transactions are arranged to ensure the Council can recoup its loans to the Company. The Council will also need to incur additional costs to support the share sale option (to be progressed in accordance with the Council's Tenders and Contracts Regulations and Spend Control Panel procedures) and shall be updated as part of the monthly financial performance reports.
- 6.11 In addition Brick by Brick has various staff who are part of the Council's Local Government Pension Scheme. Depending on the outcome of the work being done to review Brick by Brick, there will be impact on staffing within the company. Should staff decide to leave the company they will have option to either maintain their pension benefits or may seek to exit their membership and pass the benefits to another scheme. However, depending on their age staff may also be able to cash in on their pension earlier which will mean the Council's pension fund will need to make benefit payments.

Approved by: Lisa Taylor, Director of Finance Investment and Risk.

7. LEGAL CONSIDERATIONS

- 7.1 The Head of Commercial and Property Law comments on behalf of the Director of Law & Governance that under the Council's general power pursuant to Section 1 of the Localism Act 2011, the Council may exercise its rights as sole shareholder of Brick by Brick Croydon Ltd to take the steps identified in this report. Under the Articles of the company, the matters addressed are within the scope of "reserved matters", i.e. matters for which the company needs shareholder approval and where the Council (as shareholder) may direct the company (and its directors).
- 7.2 In making decisions under this report, Members will need to be mindful of the Council's financial position (including under the Section 114 notice), its fiduciary duties and the requirement to have regard to all relevant factors and to disregard irrelevant ones. The Council must act in accordance with the principles of Wednesbury reasonableness, meaning decisions that a rational person might make, having regard to all relevant considerations.
- 7.3 In relation to the recommendations in respect of revised funding arrangements, external legal advice from Browne Jacobson LLP has confirmed that this gives rise to no breach of the new "Subsidy Control "regime (formerly State aid). This is on the basis that the Council is acting as a rational private-sector party would act (being sole shareholder and lender), and having taken financial advice identifying options that such a private sector party would rely on (i.e. focussed on how the Council may best recover the investment made to date alongside other relevant considerations such as the risks and timings involved).

- 7.4 Further advice may be required regarding the self-delivery (and acquisition) options referred to in paragraphs 3.20 to 3.23, insofar as decisions relate to the powers of the Council under housing law, including in relation to HRA accounting.

Approved by Sean Murphy, Head of Commercial and Property Law & Deputy Monitoring Officer on behalf of the Interim Director of Law & Governance.

8. HUMAN RESOURCES IMPACT

- 8.1 There are no HR implications or impact for the Council as a result of this report; and if any arise these will be managed under Brick by Brick, policies and procedures as staff group are directly employed under Brick by Brick terms and conditions.

Approved by Jennifer Sankar, for and on behalf, of Sue Moorman, HR Director.

9. EQUALITIES IMPACT

- 9.1 There are no equalities impacts arising from this report. However the implications of the issues raised and how they are addressed may have an effect on the medium term financial plan. Any subsequent savings plans that have a staffing impact or impact on vulnerable and/or groups that share a protected characteristic will be subject to agreed HR procedures, formal consultation and equality analysis.

Approved by: Yvonne Okiyo, Equalities Manager

10. ENVIRONMENTAL IMPACT

- 10.1 There are no environmental impacts arising from this report

11. CRIME AND DISORDER REDUCTION IMPACT

- 11.1 There are no Crime and disorder reduction impacts arising from this report

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 12.1 There is no ideal option in dealing with Brick by Brick, all of the options and scenarios reviewed have a mix of risks and costs in the form of debt write off attached to them. However, taking into account the Council's financial situation and the level of risk involved in a number of the options, the option to either build out sites and subsequently sell some of them or sell the business are the only options that reduce risk whilst minimising the level of debt write off to the Council. None of the options are without some cost write off but the Options to be taken forward in this paper for further consideration whilst a potential sale is considered reduces the risk of write off.

13. OPTIONS CONSIDERED AND REJECTED

13.1 The report contains a range of options considered by the PwC strategic review report issued initially in November and now concluded. These are outlined in the body of this report in the attached appendix 3, and the confidential paper. Financial analysis and the Council's necessary lowered risk appetite and financial capacity means that the other options considered presented greater financial risk to the Council and as such were unviable. However, the viable options as set out in this paper can be investigated in parallel so that the Council is in a position to make a firm decision on build out or sale once due diligence has been undertaken by and on the prospective purchaser.

14. DATA PROTECTION IMPLICATIONS

14.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

NO

14.2 **HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

NO

CONTACT OFFICER: Chris Buss, consultant

APPENDICES TO THIS REPORT:

Appendix 1 – PwC Report (Part B agenda)
Appendix 2 – Schemes under construction
Appendix 3 – Options for future of Brick by Brick
Appendix 4 – Sites awaiting transfer to Brick by Brick

BACKGROUND DOCUMENTS: None

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Brick by Brick sites under contract

Development name	Current PC date / PC achieved Estimate as as 4.1.21	No of units	Social Housing units agreed to be purchased July 20 report	Social Housing units (Temporary Accommodation) agreed as part of March 20 cabinet Report
Academy Gardens	Mar 23	9	0	0
Auckland Rise and Sylvan Hill	Feb-21	57	34	0
Avenue Road	Oct-21	12	0	0
Belgrave & Grosvenor	May-23	102	0	0
Cheriton House (Flora Court)	Jan-21	27	0	0
Chertsey Crescent	Oct-20	7	2	5
Coldharbour Road	Nov-21	9	0	0
Coombe Road	Jun-22	9	0	0
Drummond Road (Ann's Place)	Dec-20	28	0	0
Eagle Hill	May-23	8	0	0
Heathfield Gardens	Mar-21	20	7	12
Hermitage Road	Dec-19	9	0	0
Homefield House (Windmill Place)	Jun-20	24	0	0
Kingsdown	Jan-21	34	5	12
Lion Green Road	Nov-22	157	33	0
Longheath Gardens	Nov-21 (block J)	53	7	7
Malton House	Mar 23	9	0	0
Marston Way	Jan-21	12	0	0
Northbrook Road	Jan-21	11	6	5
Oxford Road	Jan-21	9	0	0
Ravensdale Gardens and Rushden Close	Dec-20	30	0	0
Regina Road	Mar 23	19	0	0
Station Road	Jul-20	14	0	0
Thorneloe Gardens	Dec-20	10	6	4
Tollers Lane	Apr-21	40	10	30
Tollgate and Stockbury	Feb-21	42	41	1
Wandle Road	Dec-21	128	0	0
Warbank Crescent	Feb-21	36	36	0
Warminster	Oct-21	6	0	0
	TOTALS	931	187	76

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Funding assumption	No further funding available			Further funding is available			
Option description and permutations	Options that require least further funding from LBC			Options that require most further funding from LBC			
Positives	<p>“Winding up” Close the business and sell all assets, regardless of the status (Fire sale).</p> <ul style="list-style-type: none"> Put the company into an insolvency process. 	<p>“Full sale” Market the business’ assets as a going concern and sell them, or market shares in the company and sell them to a third party.</p>	<p>“MBO sale”</p> <ul style="list-style-type: none"> Stop funding, market the business and sell shares in the company by way of an MBO. <p><i>Full details not yet known.</i></p>	<p>“Managed winding down” Sell most</p> <ul style="list-style-type: none"> Limited new funding. Only build out developments where essential. Market all others for sale. Do not progress Tranche 2. Market land for sale, or bring back into the Council. Early restructuring of the business to reduce running costs. <i>BBB becomes run off vehicle.</i> 	<p>“Limited build out” Sell some sites</p> <ul style="list-style-type: none"> Limited new funding. Continue building out some Tranche 1 developments where construction is underway, selling some partly complete sites. Sell land with planning. Bring land back into the Council. Restructuring of the business once tranche 1 all complete and sold. <i>BBB continues to trade for up to three years then becomes run off vehicle.</i> 	<p>“Full build out of tranche 1 and parts of 2”</p> <ul style="list-style-type: none"> New funding. Continue to trade the business, building out all Tranche 1 developments where construction is underway, selling only once complete. Continue to progress tranche 2, building out where planning has been obtained.) Bring Tranche 3 land back into the Council, or sell. <i>BBB continues to trade for four/five years then becomes run off vehicle.</i> 	<p>“As is”</p> <ul style="list-style-type: none"> Continue to trade the business as is. BBB continues to trade. Full funding requirement across all phases. <p><i>Further funding of more than £313m is required in this scenario per latest forecasts. In our view, this is not a viable option for the Council. No further work is proposed.</i></p>
Negatives	<ul style="list-style-type: none"> Requires no further funding of developments. 	<ul style="list-style-type: none"> Realises cash for the Council. Requires short term funding for short term trading. 	<ul style="list-style-type: none"> Ongoing supply of affordable/ social housing. Potentially lower level of funding. 	<ul style="list-style-type: none"> Lowest new cash requirement. Realises cash for the Council. 	<ul style="list-style-type: none"> Mid level new cash requirement. Realises some cash for the Council through sales. 	<ul style="list-style-type: none"> Maximises ongoing supply of affordable/ social housing. 	<ul style="list-style-type: none"> Expensive Destroys significant value through insolvency process May compromise contractor build contracts Risks sales pipeline.
Time requirement	<ul style="list-style-type: none"> Insolvency takes several months and potentially years. 	<ul style="list-style-type: none"> Sales process takes months. 	<ul style="list-style-type: none"> Sales process takes months. 	<ul style="list-style-type: none"> Lowest level of build out takes up to two years. 	<ul style="list-style-type: none"> Longer build out takes up to three years 	<ul style="list-style-type: none"> Longest build out takes four to five years. 	

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Sites No longer to be developed out by Brick by Brick

Sites agreed by Cabinet as part of 2019 – Pipeline

Land adjacent to Brickfields Meadow – Land
Freelands Avenue – Land
Heather Way - Garages / Car Park
Tedder Road – Garages
Thorpe Close - Garages (south)
Redstart Close - Garages (south)
Redstart Close - Garages (north)
Comport Green – Garages
Calley Down Crescent – Garages
Calley Down Crescent Garages
King Henry's Drive / Gascoigne Road Flats – Infill
King Henry's Drive - Land near Tudor Academy
Frimley Crescent – Garages
9 Bramley Hill – Garages
18 Bramley Hill – Garages
Duppas Hill Terrace – Infill
Bracken Avenue – Garages
Broom Gardens – Garages
Erica Gardens – Garages
Border Gardens – Garages
Bramble Close – Garages
Fir Tree Gardens – Garages
Laurel Crescent – Land
Bedwardine Road Upper Norwood – Garages
Kennelwood Crescent, New ADDINGTON - Garages
Arkell Grove, Upper Norwood – Garages
Tamworth Road - former social Club

Sites agreed by Cabinet 2020 pipeline

Land including garages access adjacent to 115 Hermatige Road 191 Hermatige Road
Crystal Terrace - Two blocks of flats bounded by Eagle Hill, Dover Road and Hancock Road
Mill Court, 12 Highfield Hill
188-200 South Norwood Hill Estate
Flats adjacent to Beulah Family Church
Garnet Road Estate
Pridham Road Estate
Flats fronting Whitworth Road and Whitehorse Lane
Warminster Gardens Estate
Penge Road Estate
Regina Road Estate enclosed by Regina Road to the north and Sunny bank to the south
Elmwood Road/Wellington Road Estate
239 - Eastney Road/Denmead Road
Freemason's Road/Lower Addiscombe Road
Havelock house, Lower Addiscombe Road
Fisher Close/Academy Gardens Estate
Croftleigh Ave Estate
Greenview Avenue
203 - Land adjacent to 692 Mitcham Road
203 - Wingate Crescent Garages (block of 13)
203 - Wingate Crescent Garages (block of 9)
Albion Street
Denmead Road
Land at end of Leighton Street
Corner of Denmead Road and Gardeners Road
268 - Cherry Tree Green
276 - Comport Green Garages
277 - New Addington North - Overbury Crescent/Parkway
278 - Fieldway South - Castle Hill Avenue Garages
291 - Bracken Avenue
291 - Broom Gardens
291 - Erica Gardens
291 - Border Gardens
291 - Bramble Close

291 - Laurel Crescent
291 - Fir Tree Gardens
Eagle Hill Garages
Fishers Farm

Other Sites Previously agreed to transfer

Farnborough Avenue – Land
King Henry's Drive / Fairchildes Avenue – Land
Selsdon Road Flats (at approx 158 Selsdon Road) – Garages
Queens Road Sites (Ashby)(Tirrell)
Coulsdon Calat Site Malcolm Rd
Coulsdon Community Centre
Uvedale Crescent
Drovers road
Fairfield halls / College green
Atlanta Court /Parchmore Road- infill / garages
Monks Hill

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For General Release

REPORT TO:	CABINET 18 February 2021
SUBJECT:	Interim Asset Disposal Strategy
LEAD OFFICER:	Shifa Mustafa, Executive Director of Place Ozay Ali, Interim Director of Homes and Social Investment
CABINET MEMBER:	Councillor Stuart King Deputy Leader and Cabinet Member for Croydon Renewal Councillor Callton Young OBE Cabinet Member for Resources and Financial Governance
WARDS:	All
<p>CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON</p> <p>Croydon Renewal Plan – the recommendations in this report are in line with the new corporate priorities and new way for renewing Croydon</p> <p>Medium Term Financial Strategy</p>	
<p>FINANCIAL IMPACT</p> <p>This paper is seeking approval of the Interim Asset Disposal Strategy and the initial tranche of assets for disposal. Whilst the actual disposals will lead to significant revenue savings and capital receipts these will be reported as part of the individual disposals. Overall it is estimated that if all the sales are completed for the initial tranche an initial capital receipt of £7m is anticipated subject to detailed valuations and market conditions at the time of disposal. However, to reflect the potential variance in sale price and timings a more prudent approach has been adopted within the MTFS budgets and a figure of £4.2m has been reported within the Finance section of this report</p>	
<p>FORWARD PLAN KEY DECISION REFERENCE NO.: 0821CAB</p> <p>The notice of the decision will specify that the decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee.</p>	
<p>The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below</p> <p>1. RECOMMENDATIONS</p> <p style="padding-left: 40px;">The Cabinet is recommended to:</p> <p>1.1 Approve the Interim Asset Disposal Strategy and note the first tranche of proposed sales which is set out in appendix A to this report</p>	

- 1.2 Approve the proposed list of assets for disposal and to progress the marketing of the initial tranche of asset disposals as set out in appendix 3 of Part B of this report including specific approvals for:
 - i. Valuation fees for the proposed disposals
 - ii. Other cost of sales budgetary requirements as included in appendix 3.
- 1.3 Approve the proposed approach for the disposal and marketing of the Croydon Park Hotel as detailed in section 8 of this report
- 1.4 Note the requirement for additional resource to successfully manage and achieve this major project

2. EXECUTIVE SUMMARY

- 2.1 This Interim Strategy has been developed to support the requirements of the Croydon Renewal Plan and Medium Term Financial Strategy [MTFS] and sets out the guidance and governance necessary to allow the disposal of an initial tranche of assets that have been identified in Appendix A. This will be further developed and included within a more detailed Asset Management Plan which will be reported to full Council to ensure proper governance and transparency in respect of all asset disposals. This interim strategy, in combination with the new Corporate Asset Management Plan which is expected to be completed in 2021/22 financial year, will ensure the best use of the Council's assets and will complement the Croydon Renewal Plan and Medium Term Financial Strategy [MTFS]
- 2.2 It is clear that the Council is in need of a formal approach to the management of assets and in particular their disposal where they have been identified as either surplus or no longer key to the delivery of services. This must be done in a structured and controlled manner to ensure that any disposal of assets does not cause longer term operational difficulties or fail to achieve the best return for the Council.
- 2.3 The proposed Strategy will allow the Council to consider and approve identified disposals, in advance of the adoption of the Corporate Asset Management Plan.
- 2.4 As a key Investment asset, the Croydon Park Hotel has been identified for early disposal following the former tenant going into administration. This is a valuable asset that has significant holding costs and therefore an early decision as to its disposal is required. Full consideration of the proposals is detailed in section 8 of this report.

3. Wider policy considerations

- 3.1 Given the significant financial challenges faced by Councils it is important to ensure that the best outcome is achieved from any disposal and this will need to consider:

- Holding cost of any surplus assets if to be retained for longer term use or sale
- Running costs for under-utilised assets and how these can be reduced
- Service requirements across the Council to ensure an asset is not being sold off if it could provide a cost effective solution for another service area
- Achieving “Best Consideration” – would delaying a disposal be more beneficial
- Loss of revenue from any income producing assets
- Impact on the local area from holding assets empty for prolonged periods or the additional benefit from regeneration
- Reputational issues from having vacant assets

3.2 The assets to be disposed of will generally fall within seven main categories:

- Surplus vacant sites to include properties in disrepair and surplus tenanted properties - these form a large proportion of the initial tranche as “quick wins”
- Surplus assets released by service areas or tenants
- Corporate offices
- Sites currently used for delivery of services but under utilised
- Sites requiring public consultation
- Income producing assets
- Housing Sites – largely comprising of former Brick by Brick sites

4. Governance requirements of this strategy

4.1 The Council recognises that good governance is a key component of this strategy, so it is essential that all decisions to dispose of an asset must follow a defined process.

4.2 Once an asset has been identified for potential disposal it will be formally declared surplus. This will require formal sign off initially by the Executive Director for the service area and then all other Executive Directors to ensure there are no other internal requirements for the asset that might provide better financial returns than a straight sale.

4.3 A business case will be prepared and signed off by the Executive Leadership Team (ELT) to allow marketing to commence for the asset. This process will involve early engagement with both ward councillors and the relevant cabinet member to inform them of the proposed disposal. The business case report will include a minimum set of requirements, including:

- a) A business case summary template
- b) The financial case for a disposal
- c) Proposed timing of the disposal
- d) Confirmation that the asset has been declared surplus
- e) Confirmation of consultation with ward councillors and cabinet member

- f) Impact/risks of the disposal – financial, reputational, political, and operational.
- g) Evidence of an independent valuation to show that **best consideration** requirements are fully complied with
- h) A valuation of the asset by an independent RICS Registered Valuer
- i) A market assessment by a suitably qualified agent familiar with the local market/asset type including recommended method of disposal
- j) Sign off by the relevant ELT director for the disposal of the asset, where there is no longer a service requirement. This is not to be confused with ELT approval, which is required at a later stage.
- k) Cost of sales and any budgetary approval required
- l) Confirmation of deliverability of sale – where required. For example, if staff, public or other consultations are required, they need to have been completed and reported within the business case
- m) Finance and legal sign off

4.4 Once approved by ELT and Capital Board marketing will be undertaken in line with the reported process within the business case. Following receipt of an acceptable offer the disposal will be referred back to ELT, the Cabinet Member for Resources and Financial Governance and Cabinet in line with the Financial Regulations as they related to disposal of assets.

5. **Best Consideration – definition**

5.1 The disposal of any Council owned asset is subject to achieving “Best Consideration” either in line with s123 of the Local Government Act 1972 or s233 of the Town and Country Planning Act 1990 where land has previously been appropriated for planning purposes. There are exceptions where a disposal at less than best consideration can be permitted, where the variance does not exceed £2m if there are clear economic, social or environmental benefit in line with the terms of the General Disposal Consent (England) 2003 or otherwise where the Secretary of State has provided a specific consent on the basis of a Council request.

5.2 It will be the responsibility of the Place directorate to ensure that the Best Consideration is achieved on all asset disposals

6. **Key points to note about business case reports**

- Proposed sales that are not deliverable must not be submitted for approval
- ELT will reject reports that are not fully prepared and backed by the requirements set out above
- Key supporting documents must be attached to the reports seeking approval

6.1 All decisions to a disposal must be made in the following sequence:

1. Business case report to be prepared within the Place directorate and considered by Place DLT, including prior consultation with ward councillors and the relevant cabinet members

2. Final version of Business Case report to ELT
 3. Capital Board approval
 4. ELT final approval
 5. Cabinet approval or Cabinet Member approval, where required in line with the Financial Regulations and Leader's Scheme of Delegations
 6. Sale progress to be reported to ELT as part of a monthly sales update by the Place directorate
- 6.2 The Council will not assume that that capital, interest and other financial savings from a potential disposal have been confirmed until the asset has been sold and the net proceeds have been realised.

7. Disposal of Assets

- 7.1 It is recommended that where possible key local agents are used for the disposal of non-specialist assets as they will be best placed to understand the market, demand and major purchases within Croydon. The appointment of a single local agent to work with the Council across a number of the smaller sites will help to achieve a structured marketing approach that will help maximize value and allow assets to be linked where appropriate.
- 7.2 For larger sites or specialist assets it may be more appropriate to appoint major consultancy firms or specialist agents who will have the expertise and wider market coverage required for this type of disposal
- 7.3 Approval of this report will give an in principle decision to progress the marketing of the assets listed in Appendix A of this report. The assets contained within Appendix 3 of the Part B report are properties that have been initially identified for disposal may be subject to change as further investigation are undertaken and new properties may be added following a wider review. However the final disposal of any asset cannot be progressed until a full business case has been completed and the correct approval has been obtained through ELT/Cabinet in line with the governance set out in the strategy.

8. Croydon Park Hotel

- 8.1 Following the termination of the existing tenancy by KPMG acting as Administrators for the Tenant in June 2020, and following a decision at the Asset Board in September 2020, the Council has examined numerous options for the hotel, and these are summarised in Appendix 2 of this report.
- 8.2 ELT has given consideration and rejected, on business case grounds, the following options for the hotel:
- **Leasing as a hotel** – Given the pandemic there is no strong demand for hotels in the current market that provides a viable letting in the short to medium term. The Council did receive some expressions of interest, but concluded that this method of potential disposal would not deliver best consideration

- **Student Accommodation** – There was interest from a London based university, but the level of rent free period demanded (5 years) was too high coupled with a very long lead in period.
- **EATA use by the Council** – this option was preferred by members and our teams and considerable work was done to examine the business case, risks and deliverability of this option. After very careful consideration, officers concluded at ELT on 18th January 2021, that this was not a viable option.
- **Speculative “offers”** – the Council has received many expressions of interest from a very wide variety of potential parties. We have kept a record of these approaches and in the event of a marketing exercise, we will pass these details onto the appointed real estate marketing firm

Proposed approach

- 8.3 To mitigate costs and other risks, officers recommend that the Council appoints a specialist real estate advisory firm to prepare and delivery a marketing approach that would deliver best consideration.
- 8.4 A detailed brief for the appointment of the advisory firm has been approved by ELT and initial discussions have been held with lead UK advisors for hotel assets from two leading advisory firms, in the form of a soft market assessment of the intended approach.
- 8.5 Those discussions confirm that a sale as a hotel in the current market will not deliver best consideration, as hotels are likely to fall in value until 2025. The initial advice is to prepare a marketing strategy that will attract investors/developers who would be prepared to pay a premium for the development potential of the site.
- 8.6 Officers are seeking approval for:
1. The proposed appointment of real estate advisors to prepare the marketing strategy for approval by the Council to be procured under the Council’s Tender and Contract Regulations.
 2. Subject to approval of the strategy, the Council will then seek to appoint the firm to manage the sales process and present bids/offers for the Council to approve also to be procured under the Council’s Tender and Contract Regulations.
- 8.7 The likely timescale for progressing this work is set out below:
- 9th February 2021 – Scrutiny for Croydon Park Hotel
 18th February 2021 - Cabinet decision (subject to call in) to delegate to officers the responsibility to commence the appointment of a specialist real estate advisory firm
 12th March 2021 – deadline for receipt of proposals from Tier 1 advisory firms
 19th March 2021 – ELT approval to appoint preferred bidder
 1st April 2021 – appoint preferred bidder
 April – August 2021 – marketing period
 31st August 2021 – deadline for offers from potential purchasers

- 8.8 As part of the governance reporting of the above process a monthly update will be provided to ELT.
- 8.9 The purpose of the plan set out above is to provide assurance that sales progress is scheduled and monitored by the leadership at regular points throughout the process. The update reports will contain:
- Sales progress reports from the advisory firm
 - Management commentary on the sales progress report
- 8.10 It is important to stress that all decisions will be in accordance with existing delegated authorities, financial regulations and standing orders.
- 8.11 After the sales process has closed on 31st August 2021, the advisory firm will submit a report for consideration by the Council that will then be tabled for Cabinet consideration at its meeting in September 2021

9. Resource Requirements to Implement this Strategy

- 9.1 Any closure and disposal programme will require a separate budget and resource to be set up to allow the correct process to be followed and undertaken in a timely manner. Whilst the disposal costs (up to 4%) can be capitalised against sales receipts, there will need to be a budget made available to allow works to be carried out, specialist advice and if appropriate, planning consent to be obtained. All properties should be externally valued as part of the “best consideration” approach but in certain circumstances, subject to prior approval from the Executive Director Place, an internal valuation undertaken by a suitably qualified RICS registered valuer may be acceptable.
- 9.2 It should be recognised that capital expenditure to allow relocation of staff, both for the physical move and any new facilities, will be required and a suitable budget should be established for asset rationalisation work as part of the strategy.
- 9.3 Given the initial number of assets identified and the complexity of some of the closures, a specific resource should be identified to project manage the process internally to ensure that it can be progressed and monitored properly with the necessary governance being followed.
- 9.4 Initial budget costs are set against the first tranche of properties to indicate disposal and relocation costs but do not reflect the need for an additional project management resource.

10. Types of Corporate Assets

- 10.1 The Council’s corporate property portfolio is made up of a range of property assets that support the Council’s delivery of services and key objectives. The property portfolio can be broadly broken down into the following categories:-
- Operational – held to support service delivery

- Investment – held for financial return
- Community – support residents or provide recreation and increasingly to support delivery of services
- Education – Schools and other learning facilities
- Surplus – awaiting disposal, re-development or alternative use

10.2 The Interim Asset Disposal Strategy will not just focus on the surplus properties but will also consider the Council's wider property requirements so that other opportunities for consolidation and disposal or for a more viable alternative use can be considered.

10.3 It is important to recognise that any assets that become surplus may provide a viable operational solution to another element of the Council. Therefore when considering the disposal of any corporate buildings that have become surplus for the current operational requirement, details are forwarded to all directors (including plans and planning details) so that they have an opportunity to consider their suitability for alternative service requirements. These assets are only declared surplus and ready for disposal once they have been through this process. Any interest that is raised by service areas will be considered for suitability/viability and budget availability before a decision is taken.

11. HRA Surplus land

11.1 In addition to the corporate assets the Interim Asset Disposal Strategy will also cover sale of surplus HRA land which will follow the same process as detailed above.

11.2 Subject to the ongoing review of Brick by Brick, the Council may decide to dispose of some of the sites within existing pipelines that have not yet been transferred to BBB. Many of these will fall within housing estates

11.3 Such disposals will be subject to the approval of a full business case by ELT.

12. Public Open Space, Highways Land and Common Land

12.1 The disposal of land which is, or forms part of an area of Public Open Space, Highways Land or Common Land, is subject to special rules and procedures. Before disposing of such areas, the Council is obliged to publish the intention to dispose and consider any representations which are subsequently received and in the case of Highways Land additional consents or Notices may need to be issued. The provisions regarding the disposal of Common Land require consent from the Secretary of State and replacement land to be made available where the area of land to be sold exceeds 200m².

13. CONSULTATION

13.1 No external consultation has been undertaken in connection with the Interim Strategy.

- 13.2 Before the disposal of some assets, consultation will be required to meet the Council's legal obligations and also in connection with the marketing and disposal of assets.
- 13.3 Full consultation has taken place with members and the Council's senior leadership team.

14. PRE-DECISION SCRUTINY

- 14.1 The proposed strategy has been presented to Scrutiny and their recommendations have been adopted within this report

15. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

15.1 Revenue and Capital consequences of report recommendations

Given the significant financial challenges faced by the Council, the disposal of surplus corporate assets is vital to ensure an improvement in its financial position, secure value for money and achieve financial savings by considering the net costs/benefits of holding surplus assets versus sale of the assets. The capital expenditure incurred to decant some of these corporate properties, relocate staff to existing accommodation and adaptations of existing properties is factored in the net capital receipts in the table below. The running costs of these properties i.e. business rates, premises costs (cleaning, security, utilities etc) will be reduced, net of the loss of rental income streams is taken into consideration in the revenue savings in the table below.

The decision to dispose off an asset will consider 'best consideration' i.e. delaying a disposal if the outcome is more beneficial with respect to its market price so the Council is able to maximise its capital receipts.

15.2 The effect of the decision

Savings and Capital Receipts Included within the MTFS Budgets

Savings and capital receipts generated from asset disposals				
				£000
	21/22	22/23	23/24	24/25
Revenue Savings	£126.38	£451.88	£111.75	
Capital receipts	£4,230	£18,237	£19,994	£5,988
Savings in:				
Interest Costs	£69	£295	£162	£98
Minimum Revenue Provision	£156	£672	£737	£221

The figures in the above table are those that have been adopted within the MTFS and adopt a more prudent approach to reflect the uncertainties at this stage regarding the actual sales receipts and timings for the initial disposals

and therefore differ from the estimated capital receipts outlined in Appendix 3 of the Part B paper

An assumption has been made that the cash receipt could replace borrowing over 20 years which incurs annual interest costs and a minimum revenue provision. This is reflected in the table above.

15.3 **Risks**

Disposal of properties in the corporate portfolio in the current economic climate gives rise to risks and uncertainties around achieving the best possible sale price. The capital receipts in the table above reflects an element of prudence and conservatism in the receipts of disposal and its timing. However, it must be emphasised that these asset values are subject detailed market valuations and market conditions prevailing at the time of sale.

15.4 **Future savings/efficiencies**

The savings highlighted in the table above reflects an estimate of sales proceeds/capital receipts arising from disposal of corporate properties and savings in borrowing costs i.e. interest and minimum revenue provision on the general fund budgets.

Approved by: Geetha Blood Interim Head of Finance for Place, Gateway, Strategy and Engagement on behalf of the Director of Finance, Investment & Risk

16. **LEGAL CONSIDERATIONS**

- 16.1 The Head of Commercial and Property Law comments on behalf of the Director of Law & Governance that, as set out earlier in this report, when disposing of land the Council has a statutory duty under section 123 of the Local Government Act 1972 (or section 233 of the Town and Country Planning Act 1990 where the land has been appropriated for planning purposes) to ensure that it obtains best consideration for the land and buildings disposed of. In certain exceptional cases a disposal for less than best consideration is permitted where the difference in the value between the proposed disposal and the best consideration that might be obtainable on the market is less than £2M or, in other cases, with a specific consent from the Secretary of State. The processes set out in this report in relation to the Interim Disposal Strategy seek to ensure that best consideration is obtained in relation to proposed disposals. If and where disposals are proposed to proceed for less than best consideration (e.g. to secure wider community benefits) it is recommended that officers seek detailed legal advice in relation to any potential 'Subsidy Control' issues (the Subsidy Control regime replaces the State Aid regulations).
- 16.2 Land should only be disposed of by a local authority where it is considered to be surplus to the Council's requirements. The process set out in the Interim Disposal seeks to ensure that consideration is given as to potential other Council uses of land before it is recommended for disposal.
- 16.3 As set out earlier in the report, where land considered for disposal forms part of an open space before disposing of the land the Council needs to publicise the

intention to do so for two consecutive weeks in a local newspaper circulating in the area in which the land is situated, and consider any objections to the proposed disposal which may be made.

Approved by: Sean Murphy, Head of Commercial and Property Law on behalf of the Interim Director of Law and Governance & Deputy Monitoring Officer

17. HUMAN RESOURCES IMPACT

- 17.1 The proposed Interim Asset Disposal Strategy does not have any direct impact on staffing levels, restructuring or recruitment. However, some of the proposed building closures will require the relocation of staff and may require a different service delivery model. These factors will be considered in line with specific disposals that require such action to ensure that they are in line with the Council's personnel policies or other human resources matter.

Approved by: Sue Moorman, Director of Human Resources

18. EQUALITIES IMPACT

- 18.1 Within the initial tranche the majority of the sites comprise of vacant land or buildings and therefore the disposal will not impact individual's rights. The Equalities Analysis is used to inform the final decision to identify any impact on the changes on groups that share protected characteristics, evidence how we arrived at decisions that affect council staff, local people who use our council services and the wider community and help us to comply with the requirements of the Equality Act 2010.
- 18.2 An equalities impact assessment will be undertaken for individual disposals to ascertain the potential the impact they will have on groups that share protected characteristics.

Approved by: Yvonne Okiyo Equalities Manager

19. ENVIRONMENTAL IMPACT

- 19.1 The proposed strategy does not have any direct environmental impact. Any development that may take place on the disposed sites will have to be in full compliance with current planning, building and environmental legislation. In many cases the sale of redundant buildings and land will lead to new development that will enhance the local areas and lead to improved building and energy efficiency.

20. CRIME AND DISORDER REDUCTION IMPACT

- 20.1 The disposal of vacant sites and redundant buildings should help to improve antisocial behavior and crime around the sites as the buildings and sites will either be re-used or redeveloped.

21. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 21.1 The adoption of the Interim Asset Disposal Strategy and recommendations within this report will help the Council to deliver a considered and transparent disposal process that is undertaken in line with strict governance requirements
- 21.2 This will help to ensure that assets are disposed of in a timely manner securing the best financial outcomes for the Council and helping to meet the requirements set out in the MTF5.
- 21.3 The need for consultation with all Executive Directors prior to commencing disposal will also allow other, potentially more beneficial options to be considered prior to disposal to ensure no opportunities are missed to improve service delivery.

22. OPTIONS CONSIDERED AND REJECTED

- 22.1 In respect of the Strategy the only real options are:
Not to adopt an interim strategy – this would offer significant risks through the lack of a consistent approach and formal governance. Piecemeal disposals may also not capture all potential benefits that a wider programme has to offer. This option is therefore not recommended
- 22.2 To include the strategy within the wider Asset Management Plan – this would lead to significant delay and may prevent the disposal of assets in the next financial year whilst the Plan is developed and adopted. This would therefore not deliver the required financial contributions to help address the immediate financial position of the Council and requirements of the MTF5. This approach is therefore not recommended

23. DATA PROTECTION IMPLICATIONS

23.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

NO

23.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

NO

Approved by: Ozay Ali Interim Director of Homes and Social Improvement

CONTACT OFFICER:

Steve Wingrave Head of Asset Management and Estates ext 61512.

APPENDICES TO THIS REPORT:

Appendix 1 – Interim Asset Disposal Strategy

Appendix A – list of assets recommended for disposal in Tranche 1
Appendix 2 – Summary of Options considered for Croydon Park Hotel

BACKGROUND DOCUMENTS:

None

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Interim Asset Disposal Strategy

1. General Overview

This Strategy provides an initial draft for the proposed Disposal Strategy which will be formally adopted by the Council to ensure that the best use of its assets. This strategy, in combination with a new **Corporate Asset Management Plan** [to be launched in 2021/22 financial year] and will complement the Capital Plan and Medium Term Financial Strategy [MTFS].

It is clear that the Council is in a need of a formal approach to the management of assets and in particular their disposal where they have been identified as either surplus or no longer key to the delivery of services. This must be done in a structured and controlled manner to ensure that any disposal of assets does not cause longer term operational difficulties or fail to achieve the best return for the Council.

This strategy will allow the Council to consider and approve selective disposals, in advance of the adoption of the Corporate Asset Management Plan.

2. Wider policy considerations

Given the significant financial challenges faced by Councils it is important to ensure that the best outcome is achieved from any disposal and this will need to consider:

- Holding cost of any surplus assets if to be retained for longer term use or sale
- Running costs for under-utilised assets and how these can be reduced
- Service requirements across the Council to ensure an asset is not being sold off if it could provide a cost effective solution for another service area
- Achieving “Best Consideration” – would delaying a disposal be more beneficial
- Loss of revenue from any income producing assets
- Impact on the local area from holding assets empty for prolonged periods or benefit from regeneration
- Reputational issues from having vacant assets

3. Governance requirements of this strategy

The Council recognises that good governance is a key component of this strategy, so it is essential that all decisions to dispose of an asset must be subject to a full **business case report** that will include a minimum set of requirements, including:

The business case report for every disposal will include

- a. A business case summary template [to follow]
- b. The financial case for a disposal
- c. Proposed timing of the disposal

- d. Method of disposal
- e. Impact[s] risks of the disposal – financial, reputational, political, operational, etc.
- f. Evidence of an independent valuation to show that **best consideration** is guaranteed
- g. A market assessment by a suitably qualified agent
- h. Disposal options
- i. Sign off [where required] by the relevant ELT director for the disposal of the asset, where there is no longer a service requirement. This is not to be confused with ELT approval, which is required at a later stage.
- j. Cost of sales and any budgetary approval required
- k. Confirmation of deliverability of sale – where required. For example, if staff, public or other consultations are required, they need to have been completed and reported within the business case
- l. Finance and legal sign off

4. Key points to note about business case reports

- Proposed sales that are not deliverable must not be submitted for approval
- ELT will reject reports that are not fully prepared and backed by the requirements set out above
- Key supporting documents must be attached to the reports seeking approval

All decisions to a disposal must be made in the following sequence:

1. Business case report to be prepared within the Place directorate and considered by Place DLT
2. Final version of Business Case report to ELT
3. ELT approval
4. Cabinet approval, where required in line with section 9 of the Financial Regulations (attached)
5. Decision of ELT/Cabinet to be implemented by the Place directorate
6. Sale progress to be reported to ELT as part of a monthly sales update by the Place directorate

The Council will **not assume that** that capital, interest and other financial savings from a potential disposal have been confirmed until the asset has been sold and the net proceeds have been realised.

5. Methods of Disposal

Disposals cannot be progressed until an ELT/Cabinet decision has been made.

Once determined that a property is surplus to the Councils requirements, all land and property assets which are released for disposal will be fully marketed with the

exception of disposals to nominated and special purchasers (see below), which will be sold by private treaty negotiation.

Disposal of land and property can be undertaken in a number of ways and it is for the Council to determine the most appropriate sales mechanism for their asset, but potential approaches include:

- **Formal Tender** – where the sale is publicly advertised and tenders submitted by a given date.
- **Informal or Negotiated Tender** – where informal tenders are invited by a given date subject to contract. Negotiations may continue after tenders are received, with the possibility that different bidders may compete to offer the most advantageous terms. This approach enables the seller to continue to negotiate after the closing date for tenders to ensure the best possible terms and outcomes.
- **Public Auction** – where land is sold through an open auction, available to anyone. Sales will be publicly advertised in advance. Auctions have the advantage of being open, competitive and allow for transactions to be completed quickly.
- **Private sale** – where the sale of land is negotiated with one or a small number of potential buyers at a price agreed between the parties. Private sale has the advantage of being straightforward, but is likely to be appropriate only in certain circumstances (for example for smaller lots of land, where sitting tenants have rights to purchase and also farm tenants, etc.).

6. Disposals to Special Purchasers

The Council may dispose to purchasers to whom a particular asset has special value because of advantages arising from its ownership that would not be available to general purchasers in the open market. Such 'special purchasers' will include adjoining owners and parties with an interest in the property where a disposal will release additional, or marriage value, to be shared with the Council. In some cases it could also include existing tenants.

In such off market disposals will be subject to an independent valuation to demonstrate that offers received are in line or better than the best value

7. Best Consideration – definition

The disposal of any Council owned asset is subject to achieving "Best Consideration" either in line with s123 of the Local Government Act 1972 or s233 of the Town and Country Planning Act 1990 where land has previously been appropriated for planning purposes. There are exceptions where a disposal at less than best consideration, where the variance does not exceed £2m can be permitted if there are clear economic, social or environmental benefit in line with the terms of

the General Disposal Consent (England) 2003 or otherwise with the consent of the Secretary of State.

It will be the responsibility of the Place directorate to ensure that the Best Consideration is achieved on all asset disposals

8. State Aid Regulations

It must be noted that disposals by any public body need to comply with state aid rules – legal advice may be required to determine the State Aid implications of disposals and it will be the responsibility of the Place directorate to ensure state aid rules are complied with.

9. Implementing this strategy Asset Strategy Resource Requirements

Any closure and disposal programme will require a separate budget and resource to be set up to allow the correct process to be followed and undertaken in a timely manner. Whilst the disposal costs (up to 4%) can be capitalised against sales receipts, there will need to be a budget made available to allow works to be carried out, specialist advice and if appropriate, planning consent to be obtained. All properties should ideally be externally valued as part of the “best consideration” approach but in certain circumstances an internal valuation undertaken by a suitably qualified RICS registered valuer may be acceptable.

It should be recognised that capital expenditure to allow relocation of staff, both for the physical move and any new facilities, will be required and a suitable budget should be established for asset rationalisation work as part of the strategy.

Given the initial number of assets identified and the complexity of some of the closures, a specific resource should be identified to project manage the process internally to ensure that it can be progressed and monitored properly with the necessary governance being followed.

The attached spreadsheet identifies initial budget costs against each project but these will need to be developed further as part of the project management process.

10. Types of Corporate Assets

The Council’s Corporate property portfolio is made up of a range of property assets that support the Council’s delivery of services and key objectives. The property portfolio can be broadly broken down into the following categories:-

- Operational – held to support service delivery
- Investment – held for financial return
- Community – support residents or provide recreation and increasingly to support delivery of services

- Education – Schools and other learning facilities
- Surplus – awaiting disposal, re-development or alternative use

The Interim Asset Disposal Strategy will not just focus on the surplus properties but will also consider the Council's wider property requirements so that other opportunities for consolidation and disposal or for a more viable alternative use can be considered.

It is important to recognise that any assets that become surplus may provide a viable operational solution to another element of the Council. Therefore when considering the disposal of any corporate buildings that have become surplus for the current operational requirement, details are forwarded to all directors (including plans and planning details) so that they have an opportunity to consider their suitability for alternative service requirements. These assets are only declared surplus and ready for disposal once they have been through this process. Any interest that is raised by service areas will be considered for suitability/viability and budget availability before a decision is taken.

11. HRA Surplus land

In addition to the corporate assets it is important that the Disposal Strategy sets out how the Council intends to release all surplus assets including those in the HRA especially where they have already been identified as potential redevelopment sites for disposal to Brick by Brick.

Subject to the ongoing review of Brick by Brick, the Council may decide to dispose of some of the sites within existing pipelines.

Such disposals will be subject to the approval of a full business case by ELT.

12. Public Open Space, Highways and Common Land

The disposal of land which is, or forms part of an area of Public Open Space, Highways Land or Common Land, is subject to special rules and procedures. Before disposing of such areas, the Council is obliged to publish the intention to dispose and consider any representations which are subsequently received and in the case of Highways Land additional consents or Notices may need to be issued. The provisions regarding the disposal of Common Land require consent from the Secretary of State and replacement land to be made available where the area of land to be sold exceeds 200m².

13. Corporate Assets – definitions

The disposals will fall within seven main categories:

- Surplus vacant sites to include properties in disrepair and surplus tenanted properties – Quick wins

- Surplus assets released by service areas or tenants
- Corporate offices
- Sites currently used for delivery of services but under utilised
- Sites requiring public consultation
- Income producing assets
- Housing Sites
 - Sites where BBB have already obtained planning consent
 - Pipeline sites/subject to planning application

14. Corporate sites – potential disposals

The following pages set out some disposal options.

Please see appendix 1 for more detailed comments for each of the proposed sites with estimated revenue and capital savings.

14.1 Surplus vacant Sites

The Council has some sites where the previous use has been ceased and the buildings vacated and either demolished or boarded up as there are no suitable uses. They are therefore generally vacant land or have buildings that are in need of major refurbishment or structural works which means that they are best suited for redevelopment. Whilst some may have previously been considered for Council led redevelopment projects these have not come forward as viable schemes and most of the sites have now been vacant for many years.

Whilst holding costs in many cases are fairly modest, keeping these sites vacant can offer a security risk or be a source for anti-social behaviour and therefore a reputational issues. Disposal and redevelopment would provide a much more positive outcome for the local area and help generate new homes in many cases.

Consideration should be given to whether the Council should initially seek a planning consent for the site. This may help achieve a higher value but will inevitably delay the disposal and incur considerable up front cost. In many cases this is not seen as a viable option and rather than adopting this approach for all sites, each disposal will be considered on its own merits to reflect the nature of the site, holding costs and need for disposal. If planning is not secured consideration will be given to securing any significant uplift in value through the inclusion of an overage provision.

Consideration has been given to the immediate sites that have been identified for potential disposal and it is recommended that the following sites are disposed of as quickly as possible. The method of the disposals will usually be through auction or using local agents to ensure the best value is achieved. Where appropriate, discussions with the Planning Authority have taken place to inform likely future uses.

14.2 Surplus Assets Released by a Council Service or Commercial Tenants

As service requirements change over time, some buildings are released as they are no longer fit for purpose or required for the original service use. These are generally in reasonable order and have recently been vacated. They may be suitable for re-use, conversion or redevelopment. Prior to consideration for disposal, alternative service uses will be considered through the process outlined above. All assets listed below have been declared surplus through the existing disposal process and are therefore suitable for early disposal.

For tenanted assets that have been vacated, consideration will first be given to the possibility of re-letting them to generate income which may help maximise asset value if they are considered for disposal. However, where the sites are likely to generate low rental returns and capital values for vacant sites are considered to be higher than let sites, these should be considered in the first instance for sale.

14.3 Corporate Offices

The Council's corporate office strategy is to consolidate the number of offices that are used as a head office type function. Over the last 8 years around 15 sites have been vacated and the Council's corporate office function centred round Bernard Weatherall House (BWH). Changes in working styles to adopt a 3:2 desk ration has allowed some surplus space to be created and this has been absorbed through letting space within the building to partner organisations and private companies to generate additional income.

With the increase in home working opportunities and delivery of services using different methods and media, further consolidation of office space has become possible. Whilst there are few outlying offices remaining, where these exist consideration has been given to their closure and relocation of staff to BWH or provision of face to face services from other hub buildings.

Whilst the impact of Covid-Safe building requirements may currently limit some of these relocations, once these restrictions have been lifted, opportunities will arise for further relocations into BWH and the proposed office strategy builds on this and the more flexible working and service provision styles.

14.4 Underutilised Assets

Due to changing service delivery and demands, there are a number of assets that are not fully utilised and buildings could be released and those retained invested in and more intensively used. Key assets within this category include Youth provision as two new facilities, the centrally located Legacy Youth hub in Whitehorse Road and the new Timebridge centre in New Addington, have recently opened.

14.5 Sites Requiring Public Consultation

With a requirement to deliver more services for less the Council also needs to look at some of its assets currently used to deliver services to see whether an acceptable service can be delivered from less locations. The key area of consideration is focused around libraries. Whilst the Council have a statutory duty to provide a suitable library provision, we currently have 13 libraries and therefore it would be possible to consolidate the provision. Prior to the closure of any libraries it is a requirement that formal public consultation is required and for this reason, any such closures are likely to be deferred for at least 12 months.

14.6 Income Producing Assets

The Council have adopted an Investment Strategy to acquire and hold properties to specifically to produce income to support wider service delivery. However there are also a number of historic assets that the Council have acquired that produce income. If capital receipts rather than revenue income are considered to be more important than some of the assets that produce lower income levels could be considered for sale.

Consideration could be given to the sale of the recently acquired investment assets. Although these assets were purchased with a long term view to value but it is now important to consider possible early disposal where this makes commercial sense.

14.7 Housing sites

These sites form part of the ongoing review of Brick by Brick (BBB), so are not immediate disposals. The previous Asset Strategy identified a large number of surplus or underutilised sites that could potentially be used for housing development. These were investigated and brought forward through Brick by Brick and many have now been successfully developed. This process was then continued and BBB put forward further pipeline sites. Some of these have now obtained planning consent whilst others are still at the feasibility stage but with the decision not to transfer over any new sites to BBB following the recent reviews these should now be considered for potential sale to private developers.

Many of these sites were not viable for BBB to develop due to the requirement for them to deliver a high level of affordable housing even for the smaller sites that under the existing planning guidance would not require any affordable units to be provided. Private sale of these sites may therefore prove to be desirable to generate capital receipts albeit at the expense of the number of new affordable homes coming forward.

It is therefore recommended that a detailed piece of work is carried out to assess the potential of all of these sites and bring forward those that, on a purely commercial basis are likely to provide a capital receipt. Any sites that are likely to be marginal or too controversial should not be taken forward and considered for sale at this point.

For the larger sites the development options need to be carefully considered as to whether an outright sale is preferred or a possible Joint Venture option to potentially secure a higher capital sum albeit at a later date. It is recommended that for the larger sites further specialist advice is obtained from tier 1 specialist firms.

A separate piece of work is currently being undertaken to review all the BBB sites that have not already been transferred to BBB including those where contracts may have already been entered into with developers. The assessment will determine whether it is more appropriate to transfer these sites to BBB or look to terminate the contracts and dispose of them to a third party developer.

The proposal for the potential wider site disposal will look at options around straight disposal, enter into a development partnership with a private developer or housing association or not look to bring the sites forward

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Proposed Tranche 1 Disposal

Asset	General Fund/HRA	Brief Description
Glazier House, Birdhurst Road, South Croydon	GF	Former hostel accommodation most recently used by Early Help team who are now relocating to New Addington. Located in good residential area
Heath Lodge, Grangewood Park, Thornton Heath	GF	Vacant Park keepers lodge in very poor condition (c150k refurb cost). Located on the edge of the park with pedestrian access only
TAVR, Broadcoombe, Monks Hill	GF	Vacant community building comprising of 6 linked portacabins within a secure yard area in Monkshill area
Edgecoombe, Monkshill	GF	Cleared site adjacent to the park - former use as a scout hut/community building
2 Godstone Road, Kenley	HRA	Former residential building in disrepair with major structural issues on sloping triangular plot
Drayton Road, Central Croydon (Old Town)	GF	Former community building in poor order to the rear of new Community Centre. Former BBB site but without planning consent
Kempfield, Reedham Park Drive, Kenley	GF	Former 2 storey childrens home now semi-derelict. Proposed BBB development site now handed back. Proposal for a 19 unit scheme. No planning consent
Beulah Family Church annexe	GF	Leasehold interest, with annual service charge of c£40k used as a daycare facility for adults with disabilities
Former Buffer Bear site, New Addington	GF	Cleared former community use site. Limited access but good sized sloping site
Former CALAT Coulsdon, Malcolm Road and Barrie Close site (Cou;sdon Community Centre)	GF	Old CALAT Centre now occupied by temporary residential occupiers acting as guardians. Large former school building with parking. Former BBB site with planning including new health centre. Planning linked to Barrie Close site so both assets need to be sold together to allow relocation of Community Centre
Garage Site, Windmill Road	HRA	Former HRA garage site. All garages now vacant and in poor condition. Right of way across site for adjoining owner. Former BBB site with planning consent
Peter Sylvester Centre, South Croydon	GF	Current day care centre for adults with disabilities. This has been closed since March 2020 due to the Pandemic and services provided remotely. Building is two storey 1970's construction that was not purpose built as a day care centre
Goldcrest Youth Centre, New Addington	GF	Building is currently used to provide youth services but the building is dated and expensive to maintain. It is located very close to the new Timebridge community centre that could be used to provide youth services
Turnaround Centre/Cavendish House, South End Croydon	GF	1980's former office building that was converted about 9 years ago to provide ground floor meeting/consulting rooms, two floors of offices and kitchen/meeting rooms on third floor

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Croydon Park Hotel Option Analysis

Following the surrender of the lease by the administrators KPMG the Council undertook some soft market testing and asked for expressions of interest from a variety of organisations who had been in contact with the Council. This was not a full marketing exercise but there were sufficient interested parties to give a good indication as to the likely viability /desirability of the main alternatives being considered. Expressions of interest were received from 10 parties and in addition 9 student accommodation providers were contacted to assess interest from this sector.

The Council have also undertaken a detailed analysis as to the suitability of retaining the asset for temporary housing use.

This has subsequently been supported by discussions with specialist hotel consultants at KPMG and two of the main property consultancies (Savills and CBRE) together with a number of specialist asset management companies to fully understand the current and predicted short to medium term market view.

The table below summarises the outcome of these expressions of interest and advice obtained

Option	Details
Disposal As a Hotel	Two offers were received within this sector but only one from a credible operator from a medium sized chain. The proposal required a long term commitment (25 years) with no income received for an initial 2-3 year period dependant on maintenance works required following the hotel shut down. The rental level offered was at a significantly lower level due to the subdued market demand. This would have the effect of reducing the capital value significantly as well as not providing any income in the short term.
Student Accommodation	Over 15 student accommodation providers in and around London were contacted but there was very limited interest with most either not responding or stating that they were not looking to increase supply. One major London University was interested in taking on the asset but following inspection and a high level costing exercise required a 5 year rent free period plus similar period for rates relief and there after offered a much lower rental. The only other party to respond positively was only interested in taking one initial floor.
Housing	Several of the more speculative offers looked at short term housing options. The only viable option was linked to a letting to the Home Office for use for asylum seekers. This was again at a much lower rental level and it was felt that such a use was likely to bring significant additional financial and social demands on the Council. This connected with the lower rental offer made this an unattractive option. Other residential offers only required part occupation.

	<p>The Council looked at the possibility of retaining the building for use as short term temporary accommodation and considerable work was undertaken to assess the required alterations and suitability. Whilst initially thought to offer a feasible and quick option, following these investigations it was apparent that considerable adaptation work was required to make the accommodation suitable (provision of kitchens, laundry, additional fire protection works, sprinklers and some internal separation work) which was estimated at over £1m and unlikely to make the accommodation available for 12 months. There were also some doubts regarding the ability to manage the facility from existing resources and, to be viable required a high level of occupancy at all times. Due to the cost, risks and operational issues this option was not progressed</p>
Speculative Offers	<p>The majority of offers centred around potential short term management of the space as basic hostel type accommodation/budget hotel rooms, in most cases for a management fee without guaranteed levels of income with a longer term requirement to become a development partner with the Council to redevelop the asset. Although this might provide some short term income, the selection of a development partner on this basis is unlikely to secure the best option in the longer term and therefore a more focused marketing approach using specialist agents would be more likely to maximise value</p>
Specialist Advice	<p>The two specialist consultancy firms approach have both reported that they consider that despite the current economic situation, the asset should attract interest from a broad range of capital sources including hoteliers, residential developers, High Net Worth individuals (both from the UK and abroad), private equity and institutional investors. These buyers will be motivated by the scale of the asset, the fact it is to be sold with Vacant Possession and the residential development factor that is rare in this area of Croydon.</p> <p>The recovery of demand (occupancy) and room rates will take a number of years to recover to pre-pandemic levels. While the cashflows that can be derived from hotels are going to be suppressed for a prolonged period, it is an attractive time to consider alternative uses.</p> <p>Given the location of the hotel, it clearly presents a significant opportunity for intensification of the large 1.54 acre site. Immediately surrounding schemes such as Altitude 25 and Pocket Living's Addiscombe Road scheme are developed to in excess of 20 storeys.</p>

For General Release

REPORT TO:	CABINET 18 February 2021
SUBJECT:	Croydon Equalities Strategy
LEAD OFFICER:	Katherine Kerswell, Chief Executive
CABINET MEMBER:	Councillor David Wood, Cabinet Member for Safer Croydon and Communities
WARDS:	All

CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON

Equity and inclusion is integral to achieving our ambitions for Croydon – it is the very foundation upon which we ensure residents are treated fairly and equitably by the Council and its service providers, giving individuals the opportunity to be who they are and achieve the successes they aspire to. This is particularly important for those who are most disadvantaged, so they too, can reach their full potential.

We aim to value diversity and promote equity and inclusion through the services we provide and as an employer.

The organisations vision is to be a high performing organisation that is collaborative, inclusive and innovative, an employer that lets talent flourish and build workforce capability to meet our ambitions and reflect Croydon’s communities.

As part of demonstrating the Council’s understanding and awareness of its situation, it is important to acknowledge that the existing Corporate Plan for Croydon, 2018-2022 has been replaced by the new Priorities and Ways of Working, one of which prioritises tackling ingrained poverty and inequality in the Borough. These are set out below:

- We will live within our means, balance the books and provide value for money for our residents.
- We will focus on tackling ingrained inequality and poverty in the borough. We will follow the evidence to tackle the underlying causes of inequality and hardship, like structural racism, environmental injustice and economic injustice.
- We will focus on providing the best quality core service we can afford. First and foremost, providing social care services that keep our most vulnerable residents safe and healthy. And to keep our streets clean and safe. To ensure we get full benefit from every pound we spend, other services in these areas will only be provided where they can be shown to have a direct benefit in keeping people safe and reducing demand.

FINANCIAL IMPACT

There are no direct financial implications arising from the proposed Equalities Strategy.

This strategy comes at a time of great change for Croydon and we want to support our staff and residents through tough times. Croydon Council faces a financial crisis of unprecedented severity. Key to delivering this strategy will be aligning resources to

deliver positive outcomes, as far as is practicable at a time when the council is under significant financial pressure.

The new administration has provided a framework of priorities for 2021-24 and ways of working to inform the task of reshaping the council and refocusing its work which is required in order to put it on a stable financial footing and ensure that the most vulnerable residents are protected from the impacts of the Covid pandemic.

Given the current financial pressures, we have been mindful in developing this strategy to ensure it aligns with existing commitments whilst remaining ambitious - within existing resources, projects, programmes and actions.

FORWARD PLAN KEY DECISION REFERENCE NO. This is not a key decision

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below:

1. RECOMMENDATIONS

The Cabinet is recommended to:

- 1.1. Refer the adoption of the Equalities Strategy to Full Council with a recommendation for approval.
- 1.2. Refer the adoption of the new Equalities Objectives to Full Council with a recommendation for approval.
- 1.3. Note the engagement and consultation that has been undertaken to develop this strategy and supporting action plan to deliver its key priorities. Its content is applicable across the borough and is intended to benefit all our staff, residents and communities and thereby all who live and/or work in the borough, or working directly with Croydon's residents and communities.

2. EXECUTIVE SUMMARY

- 2.1 **The Public Sector Equality Duty (PSED) set out in the Equality Act 2010.**
The PSED is made up of a general equality duty which is supported by specific duties.

The **specific duty** requires the council to:

- Annually publish information to demonstrate how it is complying with the Public Sector Equality Duty. This information must relate to people who are affected by the Councils policies and practices such as service users and employees
- Prepare and publish equality objectives at least every four years. Our current equality objectives as outlined below come to an end this year.

- To increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market.
- To reduce the rate of child poverty especially in the six most deprived wards.
- To improve attainment levels for white working class and Black Caribbean heritages, those in receipt of Free School Meals and Looked after Children, particularly at Key age 2 including those living in six most deprived wards.
- To increase the percentage of domestic violence sanctions.
- To increase the reporting and detection of the child sexual offences monitored.
- To reduce the number of young people who enter the youth justice system.
- To reduce social isolation amongst disabled people and older people.
- To improve the proportion of people from different backgrounds who get on well.
- To reduce differences in life expectancy between communities

2.2 This report sets out the process and work undertaken to develop a new Equalities Strategy and corporate equality objectives.

2.3 Significant research and benchmarking has been undertaken to ensure that we understand the strengths and challenges across Croydon, so that the new strategy can target action where it will be most effective.

2.4 Wide ranging consultation was also undertaken to inform the strategy. We are clear that the resident voice should be at the heart of the new strategy. The report outlines the approach taken to consultation, recognising the challenges and restrictions created by Covid-19, summarises the feedback and outlines how this has informed the proposed strategy objectives and outcomes.

2.5 Equality Strategy 2020-2024

The Strategy sets out the Councils vision that Croydon is a place of opportunity where everyone can belong, addressing the needs and aspirations of all those who live and work in the borough.

3. BACKGROUND

Statutory obligations

3.1 The Equality Act 2010 (the Act) came into force on 5 April 2011. Section 149 of the Act contains the Public Sector Equality Duty (PSED). The duty applies to public bodies and others carrying out public functions.

The general equality duty requires the Council, in the exercise of functions, to have “due regard” to the need to:

- Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it
 - Foster good relations between people who share a relevant protected characteristic and those who do not share
 - Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- 3.2 The Act and PSED support good decision-making by ensuring public bodies consider how different people will be affected by their activities, helping them to deliver policies and services which are efficient and effective; accessible to all; and which meet different people's needs.
- 3.3 Furthermore, section 153, of the Act imposes specific duties on public authorities to exercise public functions which will demonstrate their compliance with the PSED. The Council is also required to publish information to demonstrate their compliance with the general equality duty.
- 3.4 This information must relate to people who are the Council's employees or are affected by its policies and practices (for example, service users).
- 3.5 The objectives must be published at intervals of not greater than four years, beginning with the date of the last publication (i.e. 2020 for Croydon). Published objectives must be specific and measurable.
- 3.6 [Opportunity and Fairness Commission \(OFC\) 2016-2020](#)
- 3.6.1 The Opportunities and Fairness Commission (OFC) was set up to identify issues of inequality supported by lived experiences from residents across the borough.
- 3.6.2 The work of the Opportunity and Fairness Commission supported the Council's ambition to reduce inequality and promote fairness for all by working with partners in the public, business and voluntary sectors in order to secure better outcomes for all.
- 3.6.3 Croydon OFC published its final report on 28th January 2016. The report highlighted the key inequality and fairness challenges for the borough and presented recommendations on how these could be addressed by the Council and our statutory, voluntary and community sector partners.

The recommendations in the report were presented under the following headings:

- Vibrant, responsible and connected communities
- A town centre that lifts the whole borough
- Leaving no child behind
- A connected borough where no one is isolated
- Supporting residents to better times.

3.6.4 Work carried out during and following the OFC has provided a solid foundation to base our consultation for the development of our new strategy, with participants providing feedback on the current equality objectives, and areas we should focus on going forward. *Further detail is provided in section 8 of the report.*

4. MONITORING AND PERFORMANCE

4.1 Progress made in implementing the statutory equality objectives as set out in the Equality and Inclusion Policy 2016-20 were regularly reported to Cabinet and Scrutiny & Overview Committee through the annual Equalities Report.

4.2 In addition to the annual Equalities report, the Council utilised a range of external benchmarking processes to assess and improve our approach to equalities and inclusion. Some of these are outlined below;

4.3 Equality Framework for Local Government (EFLG): Equality Peer Challenge

4.3.1 The ELFG is a national benchmarking and assessment tool that helps local authorities to identify what they do well and where they can make improvements to, and deliver better equality outcomes for staff, residents and service users.

4.3.2 In November 2019, the Council asked the Local Government Association (LGA) to conduct an Equality Peer Challenge against the “Achieving” level of the Equality Framework for Local Government Accreditation. It undertook a self-assessment against five performance criteria:

- Knowing your communities
- Leadership, partnership and organisational commitment
- Involving your communities
- Responsive services and customer care
- A skilled and committed workforce

4.3.3 The Council satisfied the criteria for the Achieving level of the EFLG, the level we agreed to be assessed. The LGA made a number of recommendations to improve equality outcomes based upon the findings during the 3 day visit, which are set out in appendix 1 of the report.

4.4 Stonewall 2019/20 Workplace Equality Index

4.4.1 Croydon Council has been a Stonewall Diversity Champion and participated in the Stonewall Workplace Equality Index since 2014. This process assesses the Council’s progress on lesbian, gay, bi and trans inclusion in the workplace.

4.4.2 The process allowed the Council to demonstrate its work in the following ten areas of employment policy and practice:

- Policies and benefits
- The employee lifecycle
- LGBT employee network group Allies and role models
- Senior leadership
- Monitoring
- Procurement
- Community engagement
- Clients, customers and service users
- Additional work

4.4.3 In 2019, Croydon was ranked 148 out of over 500 organisations that took part. Stonewall made a number of recommendations to improve inclusion for lesbian, gay, bi and trans employees in the workplace.

4.5 Disability Confident Employer

4.5.1 The Council is a Disability Confident Employer (Level 2). To achieve this level, the Council carried out a self-assessment, against a set of statements about employing disabled people. The self-assessment is grouped into 2 themes:

- Theme 1 – getting the right people for your business
- Theme 2 – keeping and developing your people

4.5.2 The Disability Confident scheme supports employers to make the most of the talents disabled people can bring to the workplace. The scheme helps employers recruit and retain great people, and:

- draw from the widest possible pool of talent
- secure high quality staff who are skilled, loyal and hard working
- improve employee morale and commitment by demonstrating that you treat all employees fairly

4.5.3 It also helps customers and other businesses identify those employers who are committed to equality in the workplace.

4.6 Timewise Council

4.6.1 Croydon Council is also Timewise accredited. This means it is driving transformational change through flexible working practices. In practice, as an employer it embeds flexibility into its wider improvement plans, fostering a culture of learning and continual improvement that aligns the benefits to its employees with improvements in workplace efficiency.

4.7 Monitoring the Equality Strategy

4.7.1 The Council will establish a board to coordinate the equality arrangements for embedding equality and managing the implementation of the strategy. The board will be responsible for the evaluation (and review) of the Equality

Strategy. It will be reviewed annually by all departments and partnerships that own the objectives, measures and actions. The review will be coordinated by the Council's Equality Manager.

- 4.7.2 Progress will be regularly reported to the senior management team, cabinet, scrutiny and themed partnership boards such as the Health and Wellbeing Board when required.
- 4.7.3 The Council will implement an appropriate involvement strategy during these reviews which will be proportionate to the degree of change likely to be needed.

5. Working in partnership

- 5.1 Given the Council's current financial context, and the challenges that the national and local economy is facing, it is more important than ever to ensure we are delivering improved outcomes for those facing inequity and disadvantage and, that we do so in the most efficient way possible; pooling resources and expertise with partners where we can, for wider impact.
- 5.2 Prior to the pandemic, Croydon was experiencing increase in demand for support services, in addition to population growth, and changing requirements – this increased following the pandemic. As a result, we need to give greater focus on becoming more preventative, and proactive in our approach.
- 5.3 Like the Council, our infrastructure and local VCS groups have also been challenged by recent societal events. As such, they have also had to change, adapt and become more flexible in a fast changing local environment.
- 5.4 The administration's new priorities and ways of working highlight the need for the Council's relationship with residents, communities, businesses and partners. In working towards this aim, it will fully involve the residents of Croydon, its communities and its partners in its improvement work on its journey to becoming an efficient, effective and financially sustainable council.

6. EVIDENCE BASE FOR NEW STRATEGY: National Context

- 6.1 The external benchmarking activities highlighted in the previous section have provided useful in identifying where the Council has performed well, as well as recommendations on areas for improvement.
- 6.2 In developing the strategy, we have worked closely with the VCS sector, particularly our partner infrastructure groups, who themselves, as part of the local community, have gathered data 'on the ground', which we incorporated in the overall strategy development process.
- 6.3 In addition to this, and as part of the strategy development process, we have examined a range of qualitative and quantitative evidence to develop our

strategy, with resident voices at the heart. Sections 4.4-4.24 outline the evidence sources that we have tapped into as part of the process of developing the strategy.

6.4 The strategy is being developed against a backdrop of prevalent international and national themes, which have been particularly highlighted in recent months by the Covid-19 pandemic. The virus has been unequal in its impact, in particular on BAME communities, but this is a result of long standing structural inequalities and socio-economic determinants of health. We have also seen a strong social response to racism through the Black Lives Matter movement. Whilst media focus may have been on cases in the USA, racism remains a very real issue for us to tackle in the UK as well. Since the EU referendum we have seen a rise in hate crimes and racism. These provide the context for the backdrop against which the strategy has been written.

6.5 A number of national studies / reports have been produced in recent years which provide a helpful insight into inequality across the country. A summary of the following reports are provided below:

- Is Britain Fairer? The state of equality and human rights (Equality and Human Rights Commission)
- Health Inequality in England – The Marmot review 10 years on (Institute of Health Equity / Health Foundation)

Beyond the data: understanding the impact of Covid-19 on BAME groups (Chief Medical Officer for England).

6.6 [Is Britain Fairer? The state of equality and human rights](#)

6.6.1 The report was published by EHRC (Equality and Human Rights Commission) in 2018 and is the most comprehensive picture of people's life chances in Britain. It examines all areas of life, including education, work, living standards, health, justice and security, and participation in society.

6.6.2 The report acknowledges that there has been some progress in recent years, such as improvements in educational attainment, involvement in politics and equality in the workplace – but there are still serious challenges yet to be addressed in respect of access to justice, hate crime and sexual harassment.

6.6.3 Child poverty has increased, as has inequalities resulting from socio-economic disadvantage seriously affecting many people's lives. Women are still not benefitting from equality in practice and there are increasingly large gaps between the experiences and outcomes of disabled people and some ethnic minorities and the population as a whole.

6.6.4 All of this is set in a context of long-term reductions to public spending, spikes in hate crime, and ongoing uncertainty about the impact of leaving the European Union. According to the report, the national picture is one that says some progress has been made towards being a fairer society, but "substantial evidence shows that opportunities, chances and outcomes remain unequal.

From the cradle to the grave, race, religion, class, disability and gender can all have a bearing on a person's prospects”.

6.7 [Health Inequity in England – The Marmot Review- 10 Years On](#)

6.7.1 This report was produced by the Institute of Health Equity and commissioned by the Health Foundation to examine progress in addressing health inequalities in England, 10 years on from the landmark study Fair Society, Healthy Lives (The Marmot Review). Led by Professor Sir Michael Marmot, the review explores changes since 2010 in five policy objectives. The recommendations in the report were presented under the following headings:

6.8 **Giving every child the best start in life:**

6.8.1 This looked at socioeconomic inequalities and how these affect those in less deprived areas resulting in lower levels of good development, increase in child poverty with over four million affected, and deprived areas losing funding for children and youth services even as need has increased.

6.9 **Enable all children, young people and adults to maximise their capabilities and have control over their lives:**

6.9.1 Clear and persistent social inequalities in educational attainment remain. These have more of an impact on gender, ethnic background children and young people in more deprived areas with those eligible for free school meals continuing to have lower levels of attainment.

6.9.2 Nationally since 2010, the number of exclusions have significantly increased in both primary and secondary schools. Children eligible for free school meals were four times more likely to be punished with a permanent exclusion. Across the country youth services have been cut since 2010 and violent youth crime has increased greatly over the period. According to the report, black children were more likely to be arrested than white children in 2017/18.

6.10 **Create fair employment and good work for all:**

6.10.1 There has been an increase in poor quality work – low-paid and unskilled including part-time, short-term contracts, self-employment and insecure employment.

6.10.2 The number of zero hour contracts has significantly increased since 2010 Real pay is still below 2010 levels and there has been an increase in the proportion of people in poverty living in a working household.

6.10.3 Minority ethnic groups, women, lone parents, and people with disabilities have higher unemployment rates.

6.11 **Ensure a healthy living standard for all:**

- 6.11.1 Wage growth has been low since 2010 and wage inequality persists - particularly for children and for those in work.
- 6.11.2 Lone parents with children have the highest risk of being in persistent poverty. The number of families with children who do not reach the minimum income standard has increased. Food insecurity has increased significantly.
- 6.11.3 Nearly half of those in poverty in the UK in 2018 - 6.9 million people - were from families in which someone had a disability.
- 6.11.4 Some ethnic groups face much higher rates of poverty than others, particularly those who are Black, Bangladeshi, Pakistani origin where rates of poverty after housing are as high as 50%.

6.12 **Create and develop healthy and sustainable places and communities:**

- 6.12.1 According to the report, Government spending has decreased most in deprived places and cuts in services outside health and social care have hit more deprived communities hardest.
- 6.12.2 The cost of housing has increased significantly including social housing, impacting on all the other social determinants of health and pushing people into poverty, homelessness and ill health.
- 6.12.3 The number of non-decent houses has decreased, including in the private rented sector, but this sector also has nationally high levels of cold, damp, and poor conditions including insecure tenures. Homelessness has increased significantly including more children in homeless families living in temporary accommodation

6.13 **[Beyond the data: Understanding the impact of Covid 19 on BAME groups](#)**

- 6.13.1 This piece of work was commissioned by the Chief Medical Officer for England to understand the extent that ethnicity impacts upon risk and outcomes of Covid-19. The PHE review of disparities in the risk and outcomes of COVID-19 shows that there is an association between belonging to some ethnic groups and the likelihood of testing positive and dying with COVID-19.
- 6.13.2 The review found that the highest age standardised diagnosis rates of COVID-19 per 100,000 population were in people of Black ethnic groups (486 in females and 649 in males) and the lowest were in people of White ethnic groups (220 in females and 224 in males).
- 6.13.3 An analysis of survival among confirmed COVID-19 cases showed that, after accounting for the effect of sex, age, deprivation and region, people of Bangladeshi ethnicity had around twice the risk of death when compared to people of White British ethnicity. People of Chinese, Indian, Pakistani, Other Asian, Caribbean and Other Black ethnicity had between 10 and 50% higher

risk of death when compared to White British.

6.13.4 Death rates from COVID-19 were higher for Black and Asian ethnic groups when compared to White ethnic groups. This is the opposite of what is seen in previous years, when the all-cause mortality rates are lower in Asian and Black ethnic groups.

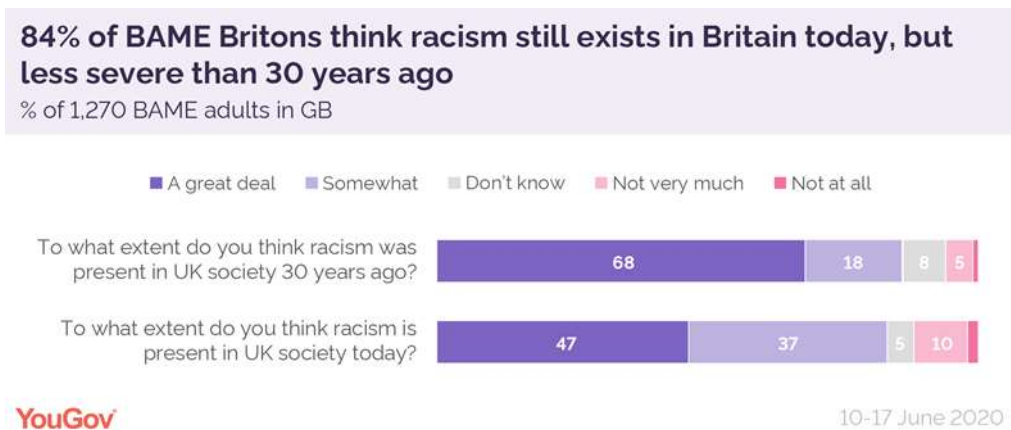
6.13.5 The literature review and stakeholder feedback indicate that risks associated with COVID-19 transmission, morbidity, and mortality can be exacerbated by the housing challenges faced by some members of BAME groups. The most recent research from the UK suggests that both ethnicity and income inequality are independently associated with COVID-19 mortality. Individuals from BAME groups are more likely to work in occupations with a higher risk of COVID-19 exposure. They are more likely to use public transportation to travel to their essential work. Historic racism and poorer experiences of healthcare or at work may mean that individuals in BAME groups are less likely to seek care when needed or as NHS staff are less likely to speak up when they have concerns about Personal Protective Equipment (PPE) or risk

6.14 Black Lives Matter

6.14.1 The brutal killing of George Floyd and the subsequent involvement of many across the world in the Black Lives Matters movement has illustrated the depth and breadth of feeling about disproportionality and racial injustice.

6.14.2 As the graphic below demonstrates, whilst BAME residents recognise racism is less of an issue than 30 years ago in the UK, nearly half still feel racism still exists 'a great deal'.

6.14.1 The Council's new equality strategy therefore includes a strong focus on race and racism and how it will address service improvement, by collecting and sharing best practice in tackling inequality; coordinating, where appropriate, across service areas – with the aim of helping local initiatives to tackle unfair outcomes (e.g. those disproportionately affecting Black, Asian and Minority Ethnic communities) – supported by targeted early intervention.



6.15 Hate Crime Surge

6.15.1 According to the Home Office, there were 103,379 hate crimes recorded by the police in England and Wales, an increase of eight per cent compared with year ending March 2019 (97,446 offences). This is following certain events such as the EU Referendum and the terrorist attacks in 2017.

6.15.2 Hate crime offences recorded by the police rose by 8% compared with year ending March 2019 (97,446 offences) in year ending March 2020, there were 105,090 hate crimes recorded by the police in England and Wales

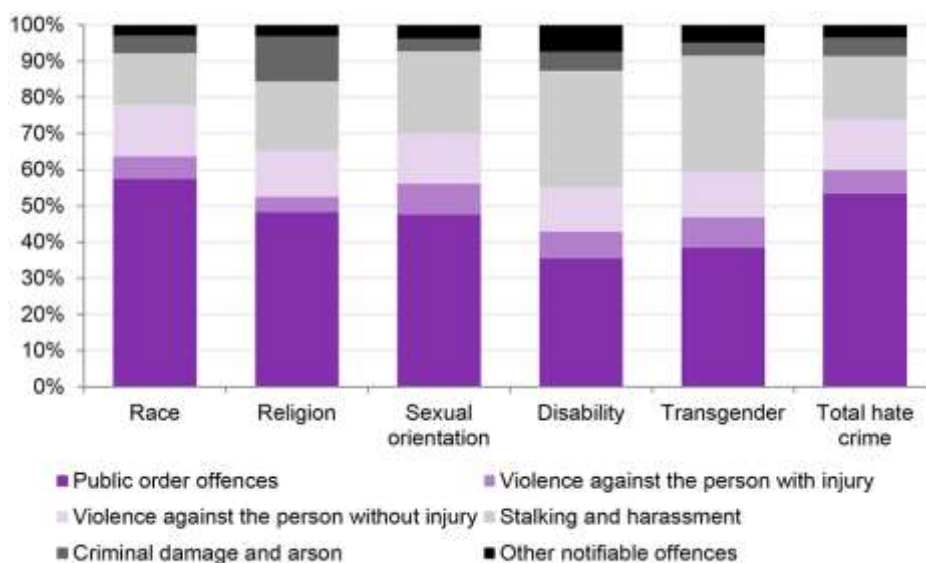
6.15.3 As in previous years, the majority of hate crimes were race hate crimes, accounting for around three-quarters of offences (72%; 76,070 offences). These increased by six per cent between year ending March 2019 and year ending March 2020.

6.15.4 Religious hate crimes fell by five per cent (to 6,822 offences), down from a peak of 7,203 in the previous year. This was the first fall in religious hate crimes since year ending March 2013.

6.15.5 Sexual orientation hate crimes increased 19 per cent (to 15,835), disability hate crimes by nine per cent (to 8,469) and transgender identity hate crimes by 16 per cent (to 2,540). These percentage increases are smaller than seen in recent years.

6.15.6 Over half (53%) of the hate crimes recorded by the police were for public order offences and a further third (38%) were for violence against the person offences. Five per cent were recorded as criminal damage and arson offences.

6.15.7 Around 12% of hate crimes offences in 2018/19 were estimated to have more than one motivating factor, the majority of these were hate crimes related to both race and religion



6.16 EVIDENCE BASE FOR NEW STRATEGY: Local Context

6.16.1 Croydon is the second largest of all the London boroughs in terms of population. Its population continues to grow. The borough population recorded in Census 2001 was 330,587 and in the 2011 Census it had increased to 363,378. Based on ONS mid-year estimates, 2017, Croydon is home to 384,837 people and this is expected to increase to just under 500,000 by 2050.

6.17 Deprivation

6.17.1 Croydon faces challenges around deprivation and inequalities in regard not only to income but other factors including health, education and housing. There remains geographic inequality in the distribution of deprivation in the borough with the North and East of the borough remaining more deprived.

6.18 Income

6.18.1 Croydon has an average score of 0.136 for the income domain, which places it as the 97th most deprived local authority out of the 317 lower tier authority districts in England or 73rd out of 151 upper tier authorities. Croydon is ranked 18th most deprived out of 33 London boroughs.

6.18.2 41 LSOAs out of the 220 LSOAs in the borough (18.6%) are in the top 20% most deprived LSOAs in the country. These deprived areas are mainly in the north and east of the borough. One neighbourhood area in the ward of West Thornton is in the top 5% most deprived areas in the country.

6.19 Employment

6.19.1 The average score for the Employment domain was 0.092, placing Croydon as the 143rd most deprived LSOA out of the 317 lower tier districts or 87th out of 151 upper tier districts. Croydon is 15th most deprived out of 33 London boroughs.

6.19.2 Under the employment domain, only 2 LSOAs, less than 1% of all the LSOAs in Croydon, are in the 5%-10% most deprived areas in England. These 2 areas are located within the wards of West Thornton and New Addington South

6.19.3 The proportion of out of work claimants has risen by around 5% since March 2020 – directly as a result of the impact of the Covid19 pandemic on the economy.

6.19.4 There has been a huge increase in unemployment for 18-24 year olds and 50-64 year olds since April 2020.

6.20 Education, skills and training

6.20.1 Croydon is in the bottom third of local authorities in the country under this domain; the average score for the borough was 15.577 making it the 220th most deprived borough out of the 317 lower tier districts or 117th out of 151 upper tier authorities. Croydon is 12th most deprived out of 33 London boroughs.

6.20.2 There are just 3 LSOAs in the top 5%-10% most deprived areas in the country and these areas are in the East of the borough with known historic issues around lower average attainment scores for pupils and a higher proportion of adults with no qualifications. The take up of funded hours in Early Years settings in Croydon is still below regional and national averages.

6.20.3 The proportion of children achieving grades AAB or above at Key Stage 5 is much lower than the national and regional averages.

6.20.4 Since 2015 at local, regional and national levels there has been a lower proportion of children from Black backgrounds achieving Attainment 8 scores.

6.20.5 Like with England as a whole Black Caribbean pupils in Croydon have the greatest level of disproportionately when it comes to exclusion from school.

6.21 Health deprivation and disability

6.21.1 The average score for Croydon for this domain was -0.174, making it the 165th most deprived lower tier authority out of the 317 or 95th out of 151 upper tier authorities. Croydon is 13th most deprived out of 33 London boroughs.

6.21.2 Less than 0.5% of the Croydon LSOAs under this deprivation domain were in the top 5%-10% most deprived areas in the country. The most deprived areas in Croydon in this domain are in the centre of Croydon, and in the East of the borough. These areas scored highly across each of the measures used for this domain.

6.22 Living environment

6.22.1 The living environment domain looks at both the indoor and outdoor living environments. The indoor living environment is based on the proportion of houses without central heating and the proportion of houses that are in poor condition. The outdoor living environment looks at air quality and road traffic accidents that cause injury to pedestrians and cyclists.

6.22.2 The most deprived areas for this domain are predominantly located in the centre of the borough. These areas have high scores both for the indoor and outdoor living environment measures.

6.23 Income Deprivation Affecting Children

6.23.1 The North and East of the borough are relatively more deprived than the South West of the borough. There is a southernmost area in the borough

which is within the new Old Coulsdon ward, (formerly Coulsdon East), which scores high on income deprivation affecting children.

6.24 Income Deprivation Affecting Older People

6.24.1 In Croydon 17% of older people were income deprived. This puts Croydon in the top third most deprived areas for this domain. These are predominantly in the North of the borough, with a few in the East.

6.25 Housing

6.25.1 The most common reasons for homelessness is parental evictions, exclusions by relatives and friends and relationship breakdowns. Croydon was the first London borough to halve its use of temporary accommodation in line with the target set by government.

6.25.2 Latest figures for 2019/2020 show that more than half (56%) of homeless people in Croydon are in the 25-44 years age band.

6.25.3 Over the years, by far the highest proportion of accepted homeless households in Croydon have been made up of lone parents with dependent children.

6.25.4 There has been a disproportionately high percentage of homeless people from the Black community, both currently and historically.

6.26 Community Safety

6.26.1 In Croydon the total number of hate crimes has been increasing year on year over the past 3 years.

6.26.2 The majority of reported hate crimes in Croydon have been racist and then homophobic hate crimes. Racist hate crime has been recorded for longer than others so there is likely to be a better reporting rate for racist crimes.

6.26.3 The number of race hate crimes continue to increase every year. The first 6 months of the current financial year indicates that the upward trend is likely to continue and the year-end position is likely to show the highest number of racist hate crimes for 4 years. The average monthly number is 723 so far this year compared to only 585 per month over the previous 36 months.

6.26.4 The number of disability hate crimes in Croydon has averaged around 18 per month over the previous 24 months. Since April 2020, the average rate has been 26 per month which is significant even though the actual numbers are low.

6.26.5 The number of faith hate crimes had been falling in Croydon during the 2018/2019 period. The first half of the 2019/2020 year continued this downward trend until the last 5 months when the numbers rose again. Figure

16 shows that these crimes have gone back to the 2018/2019 levels but the trend line suggests that they may reduce in the coming months to year-end.

6.26.6 BREXIT, even though supposedly concluded, still continues to contribute to the presence of extremist groups and this, in turn, has contributed to a rise in the number of anti-semitic incidents reported to the Police.

6.26.7 In Croydon, there continues to be a year on year increase in sexual orientation (homophobic) hate crime reported to the MPS. The figures have risen from a base of around 20-30 crimes in 2012/2013 to an average monthly figure of 67 per month over the 3 years 2017/2018 to 2019/2020. For the first 6 months of 2020/2021, the monthly average is 104.

6.26.8 Croydon has seen an increase in the number of transgender hate crimes, particularly over the last financial year ending 31. March 2020. Figure 20 shows that for the first half-year of the current 2020/2021 financial year there is a downward trend for the first time in 3 years.

7. OUR APPROACH TO DEVELOPING A NEW EQUALITY & INCLUSION STRATEGY

7.1 As previously mentioned, the strategy is being developed against a backdrop of prevalent international and national themes as outlined in section 4 of the report.

7.2 We identified and benchmarked against best practice and reviewed a range of plans and strategies as part of the process of developing the strategy in order to determine equality issues and challenges on a regional and national level. *These can be found in Appendix 5.*

7.3 We also reviewed national and local evidence as outlined in sections 4 and 5 of the report to ensure the process was data and intelligence led.

7.4 To further strengthen the above we examined independent feedback provided by third party 'critical friends' such as the LGA through our recent EFLG Peer Challenge and Stonewall Workplace Equality Index recommendations both of which provided us with a solid starting point, and key indicators for improvement in tackling inequality and promoting greater inclusion amongst protected groups within our workforce, in the community and beyond.

7.5 To avoid duplication, and create wider more diverse and varied efficiencies, we identified existing synergies and opportunities by examining current Council strategies, policies and plans that support delivery of equality, diversity, inclusion and/or can be mapped to existing commitments. It should be noted that there are many Council services who through their strategies are currently contributing to tackling inequalities and addressing disadvantage across the borough for protected groups. The following is a sample of the more recently developed strategies and not intended to be exhaustive list:

Strategy Name	Protected Groups
Corporate Plan 2018/22	All protected groups
Workforce Strategy 2019-2022	All protected groups
Refreshed Recruitment Policy	Race, Disability, Gender
Schools Improvement Plan	
Croydon Partnership Early Help Strategy 2018/20	Age; Disability; Gender
Joint Health & Wellbeing Strategy 2018/22	Age; Disability; Pregnancy Maternity; Gender
Autism Strategy (pending)	Autism, Disability
Housing Strategy (pending)	All protected groups
Economic Recovery Plan (pending)	All protected groups

8. CONSULTATION

- 8.1 We sought internal and external stakeholder input help us test our existing equality objectives (*as outlined in Appendix 4*), identify where our priorities should lie going forward across the nine protected characteristics, extending to socio-economic circumstances which have a considerable impact on inequality, inclusion and quality of life. We also wanted to use the opportunity to gather views on what the Council does well and what it can do better to reduce inequalities in the Borough.
- 8.2 We consulted with residents across the Borough, taking into account the diversity of the Borough and the needs of all residents across protected characteristics as defined by the Equality Act.
- 8.3 We ensured we consulted with VCS organisations that were representative of all communities across the Borough and often supporting some of the most vulnerable residents.
- 8.4 We ensured we consulted with staff across all protected characteristics and across all levels in the organisation. This also included Cabinet Members and Councillors.
- 8.5 In order to reach a wide range of people within each stakeholder group, and recognise the differences between the stakeholder groups, a range of channels were utilised to promote engagement in the equality strategy consultation. Restrictions as a result of the Covid-19 pandemic meant that some usual channels, such as face to face workshops or VCS engagement events could not be utilised. We also had to adapt regular communication channels.

We run four promotion campaigns on the Council's social media – i.e. Facebook, Twitter and Instagram between July and September. We have also advertised opportunities to get involved on the intranet, in the weekly newsletter Your Croydon, weekly Our Croydon bulletin, which gave us the potential to reach in excess of 80,000 residents.

- 8.6 Consultation consisted of an online survey and online focus groups. Telephone interviews were used to reach people that were unable to engage through online channels – this represented a more cost effective and direct approach than postal methods, which have been discounted. We were also invited to attend stakeholder meetings with Croydon BME Forum, Asian Resource Centre (ARCC), Youth Parliament, and Empire for Looked after Children.
- 8.7 We also ensured engagement opportunities were flexible – including late evenings and Saturdays to accommodate wider participation of protected groups. 1-2-1 telephone calls would be at the convenience of respondents, they were also used to complete the online survey with respondents who were reluctant or unable to take part in online focus groups.
- 8.8 The hardest to reach protected groups have been those within the transgender community and pregnant women. In part because during Covid-19, maternity clinics were not being held in the usual manner. We therefore approached partner organisations to promote the opportunity and contacted all known local transgender groups.
- 8.9 The online survey was developed and launched using the Council's 'Get Involved' platform. The site has software adjustments for those with visual impairments. The online survey /questionnaire was designed as a 'perception' survey that allowed respondents to give us their views on how the Council is tackling inequality; comment on current equality objectives; suggest additional objectives and priorities the Council should focus on for the next four years.
- 8.10 The online workshops asked the same questions as the online survey, with responses captured anonymously using an online tool called Retrium. By using this tool we were able to encourage more open and honest feedback while protecting individual identities during workshops. As a result feedback from the workshops was much more granular, honest and practical than one might otherwise expect.
- 8.11 In total we hosted 30 online workshops with attendees across the 9 protected groups (note that no person, community group or organisation was required to declare an interest), in addition we also held twelve 1-2-1 telephone interviews for those unable or unwilling to use online channels. On an average virtual workshops were attended by between 5-6 attendees with the exception of the BME Forum and ARCC workshops, whose sessions were at capacity. Online workshops were also held with staff in their capacity as employee, resident and service provider. Lastly, we also held meetings with each of the Council's staff diversity networks.
- 8.12 In total, we were able to engage with around 334 participants over a three month period.
- 8.13 We found that although most people agreed with the current objectives, some of the most important issues for respondents were not included in the

objectives and there were many other issues that have arisen in the last 4 years. Responses that focussed on new or 'emerging issues' – areas not covered by the current objectives' – were classed as 'emerging themes'.

8.14 Below are some of the high level findings.

- Respondents agreed with the current equalities objectives.
- Respondents also felt that the current objectives did not cover all of their concerns.
- In the last 4 years, people's concerns around equality have changed and there are a plethora of new and emerging issues.
- Across different groups and protected characteristics there are numerous concerns relating to individual circumstances, however there are key issues that are consistent across all groups.
- Overall, a high proportion of respondents felt that the aims should be measurable and progress should be made easily available for all residents to access.
- Respondents felt that the new priorities should also contain information specifically related to the council's role in tackling and reducing inequality.

8.15 Below is a further breakdown of feedback in relation to the key themes, including existing themes and emerging themes:

8.16 Jobs and the economy

- Need for the council to support those who have been financially affected by COVID-19, such as elderly and disabled people
- Need to support people back into employment, as well as job retention
- Ensure that all residents feel the benefit of development, particularly in overcrowded areas such as Thornton Heath

8.17 Housing

- Need for more affordable housing across the borough for its poorest residents, particularly in the North of the Borough
- Need for housing to be allocated in a fair and equitable way, to ensure there is no discrimination against particular groups.
- Need to tackle homelessness, and particularly for BAME men in the borough, who are more likely to end up being classed as homeless.

8.18 Children and Families

- Disproportionate treatment of young people (particularly black males) by police and in education
- Lack of youth services on offer for young people in the borough
- Concern about violence amongst young people
- High number of exclusion rates for young BAME people
- Education outcomes across different groups

8.19 Community Safety

- Need to address the root cause of domestic violence
- Concern about violence amongst young people and feeling unsafe for young people in the North of the Borough

8.20 Social Isolation

- Linked to many other issues throughout the consultation
- Lack of access and need for service improvement for disabled and particularly autistic people has a detrimental effect on mental health and feel isolated.
- Covid 19 and key contributor to social isolation particularly for older people, disabled people and those who have become unemployed.
- Need for community support and an active voluntary sector, supported by the council

8.21 Stronger communities

- Importance of a thriving VCS in the borough
- Need to engage different groups in different communities
- Need for partnership effort between VCS, local community leaders

8.22 Health

- Training and awareness in relation to autism
- Need for more support and services for those living with autism
- Need for improved accessibility in relation to disability
- Need to tackle health inequalities and outcomes for different groups

8.23 Societal inequities (emerging theme)

- Need for more equitable treatment of groups especially black communities

8.24 Council as an employer (emerging theme)

- Need for more diverse workforce making key-decisions
- Need for a diverse management team that reflects the diversity of the borough.
- Increasing training and awareness of staff, particularly frontline staff
- Council as a role model

8.25 Council as a community leader and service provider (emerging theme)

- Council as a role model around equity and inclusion
- Need to build equality into the commissioning process
- Service delivery models should reflect the inequities across the borough
- Council championing equality in the community and with its partners

You can obtain further information about the consultation in appendix 4.

9. NEW EQUALITY AND INCLUSION STRATEGY

- 9.1 The draft strategy is attached as appendix 8. This has been drafted based on the evidence and consultation findings summarised in previous sections.
- 9.2 The report starts with a Foreword by the Cabinet Member for Safer Croydon and Communities, this is followed by a section introducing the report. This is followed by some key equality statistics. It also includes a plan on a page that provides a concise, simple, at-a-glance summary of the strategy that will allow every single employee to pick it up, understand what it says, and understand what needs to be done.
- 9.3 The strategy sets out 4 clear outcomes, each with a set of 3 objectives that inform the smart actions that will be delivered over the course of the next four years.

Outcome 1: The Council addresses social inequities as a community leader and an employer

Objectives

1. The Council's workforce reflects our diverse communities at all levels
2. The Council acts as a role model and champions a fair society
3. We ensure equality training is central to the way work, is regularly undertaken, and is reviewed to meet changing needs

Outcome 2: We work with our residents to better understand our communities

Objectives

1. Continue to increase our network across seldom heard groups
2. Information about the council's work towards tackling inequality is easy to access and understand
3. Data about local communities is more effectively collected, analysed and used to inform decisions and improve services.

Outcome 3: Use partnerships to improve access and meet individual needs as they arise

Objectives

1. Enable better education outcomes by offering support to groups who need it most
2. Support the creation of jobs that enhance quality of life
3. Services are proactive in targeting groups that have accessibility issues as a result of disability, age, mental health, language, digital and/ or physical barriers

Outcome 4: People in Croydon are supported to be in good health

Objectives

1. Work with partners to tackle social isolation and bring people together

2. With our partners use our knowledge of specific health challenges to support improvements
3. We work with our partners to open the door to health services, and support them to make sure residents know where and how to access services

10. PRE-DECISION SCRUTINY

- 10.1 The Scrutiny & Overview Committee have received regular reports on progress against the Council's existing equality objectives. In May 2020, the Committee received a report outlining the proposal to create a new strategy. This provided the Committee with an opportunity to have direct input to the approach and the consultation plan. Overall comments from the committee were the Council needs to demonstrate progress against objectives over time, reporting on factors we want to improve. The also felt that the action plan leading from the new strategy needs to be challenging but achievable, with realistic, timed milestones and named responsible officers. Officers also felt that the council will need to ensure how it will use more up-to-date equality data going forward and also consider intersectionality and seldom heard groups such as neuro diverse groups.
- 10.2 This was followed by Informal Scrutiny & Overview Committee meeting in June where the Committee received the draft engagement and consultation plan. The report gave details of the consultation plan, survey questions, timescales and stakeholders. Overall comments from the committee were SMART objectives need to be built into the next strategy, focused on results not outputs, strategy needed to be developed in full awareness and consideration of recent events and conversations – namely Black Lives Matter movement, need to ensure we hear from wide range of voices –not just usual suspects, strategy needs to be ambitious, but also recognise Council's ability to influence actions.
- 10.3 In September the latest results of the consultation were presented to the Scrutiny & Overview Committee informal meeting, alongside initial ideas for strategy, our approach to develop the strategy and draft outcomes and objectives. Overall comments from the committee were positive and members of the committee responded well to the idea of a strategy being developed with the voice of residents at its core. Monitoring; implementation mechanism - include information about this is in cabinet and scrutiny reports and final strategy.
- 10.4 The draft strategy was presented to an Informal Scrutiny Review meeting in Jan 2021. Overall comments from the committee were positive. The committee was of the view that more could have been done to raise awareness of the strategy to residents and communities, including providing feedback to stakeholders that were involved in developing the strategy, officers also felt that going forward more needs to done to improve the collection and analysis of equalities data such as developing an equalities dashboard. The committee also felt that consideration needed to be given to

areas such as domestic abuse, mental health, autism and Brexit and the impact on food poverty. Following that meeting, the committee will then report findings to the Overview and Scrutiny Committee meeting on 9 February 2021.

11 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 11.1 There are no direct financial implications for this plan. The Council's Equality Strategy incorporates the council's public sector equality duties as well as the national equality service improvement framework. It demonstrates the Council's compliance with the current legal framework.
- 11.2 Failure to implement and annually report on the Council's Equality and Inclusion priorities and actions will expose the Council to risk of claims for breach of statutory duty. Failing to implement actions identified in the equality analysis conducted to support decision-making or compliance with the public sector equality duties will also expose the Council to risk.
- 11.3 The Equality Strategy will be published in an electronic format and will not incur a publication cost to the Council.
- 11.4 Publication of the Equality Strategy will not incur production costs. The Strategy must be accessible and therefore made available in different formats, in summary and electronically - on the Council's website and intranet. Provision for this is available from existing budgets available to the Resources Department.
- 11.5 Key to delivering this strategy will be aligning resources to deliver positive outcomes, as far as is practicable at a time when the council is under significant financial pressure. Given the current financial pressures, we have been mindful in developing this strategy to ensure it aligns with existing commitments whilst remaining ambitious - within existing resources, projects, programmes and actions.
- 11.6 **The effect of the decision**
The approval of the Equality and Inclusion Annual Report will have no effect on the current financial situation. Action will be delivered in accordance with the risk management process.
- 11.7 **Risks**
The risk of not adopting the Equalities Strategy could mean that the council and its partners fail to meet the needs of our residents which could have a direct impact on their life prospects and opportunities to achieve positive outcomes.
- 11.8 **Options**
Outlined below in section 12.
- 11.9 **Future savings/ efficiencies**

There are no savings or efficiencies associated with the approval of this report.

Approved by Matthew Davis, Deputy S151 Officer, Finance Investment and Risk on behalf of Lisa Taylor, Director Finance Investment and Risk

12. LEGAL CONSIDERATIONS

- 12.1 The Head of Litigation and Corporate Law comments on behalf of the interim Director of Law and Governance that the Equality Act 2010 (Specific Duties) Regulations 2011 sets out that the Council must publish information to demonstrate its compliance with the duty imposed by section 149(1) of the Equality Act 2010, not later than 31st January 2012; and subsequently at intervals of not greater than one year beginning with the date of last publication. The information which the Council publishes must include, in particular, information relating to persons who share a relevant protected characteristic who are—
- a) its employees;
 - b) other persons affected by its policies and practices.
- 12.2 Section 149(1) (a) to (c) sets out the public sector equality duty with which the Council is required to comply. A public authority must, in the exercise of its functions, have due regard to the need to—
- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 12.3 In addition, the Council is required to publish one or more objectives it thinks it should achieve to do any of the things mentioned in paragraphs (a) to (c) of subsection (1) of section 149 of the Act referenced above.
- 12.4 The objectives must be published—not later than 6th April 2020; and subsequently at intervals of not greater than four years beginning with the date of last publication.
- 12.5 An objective published by a public authority in compliance with paragraph (1) must be specific and measurable and must be published in such a manner that the information is accessible to the public.
- 12.6 The Equality strategy will help the Council meet the PSED in full, and the supporting Action Plan, along with the approach to monitor its success and deliverability meets Section 153 of the Act, thus minimising any reason or likelihood of a successful legal challenge on this.

Approved by: Sandra Herbert Head of Litigation and Corporate Law on behalf of the interim Director of Law and Governance.

13. HUMAN RESOURCES IMPACT

- 13.1 Equality is integral to our workforce processes, policies and practices, including becoming an employer of choice. We continue to make positive progress towards having a workforce that reflects its community and where inclusivity is embedded in our practice, though it is recognised that there is more to do.
- 13.2 The strategy will help the Council achieve its ambition to be an organisation that is collaborative, inclusive and innovative, an employer that let's talent flourish and build workforce capability to meet our ambitions and reflects Croydon's communities

Approved by Sue Moorman, Director Human Resources

14. EQUALITIES IMPACT

- 14.1 The Equality Strategy seeks to understand the issues and challenges faced by the people of Croydon in order to create a place of opportunity where everyone can belong, addressing the needs and aspirations of all those who live and work in the borough.
- 14.2 The Strategy sets out the Council's Equality objectives 2020-2024. This will help the Council meet the PSED in full, and the supporting Action Plan, along with the approach to monitor its success and deliverability meets Section 153 of the Act, thus minimising any reason or likelihood of a successful legal challenge on this.
- 14.3 The strategy was developed in partnership with Croydon's residents, businesses, Voluntary and Community Sector (VCS) and staff. We gathered information from a range of impact and needs assessments, identified key challenges and invited a range of internal and external stakeholders to confirm these. We also utilised information a range of national and local sources, some of which are outlined in section 6 of the report.
- 14.4 An equality analysis was undertaken to ascertain the potential impact the strategy and associated action plan would have on groups that share protected characteristics. This concluded that the strategy would have a positive impact on all groups that share protected characteristics as it seeks to address the greatest inequalities faced by vulnerable and disadvantaged communities in the Borough

Approved by Yvonne Okiyo, Equalities Manager

15. ENVIRONMENTAL IMPACT

- 15.1 There are no environmental issues arising as a result of this report and accompanying strategy

16. CRIME AND DISORDER REDUCTION IMPACT

- 16.1 The strategy will help the Council foster good relations between communities and work towards building a cohesive and inclusive Borough through addressing key issues such as discrimination and hate
- 16.2 The priorities of the Violence Reduction Network, which seeks to take a public health approach to tackling violence, are aligned with the priorities within this strategy.

17. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 17.1 The proposed recommendations are as follows:
- 17.2 Refer the adoption of the Equalities Strategy to Full Council with a recommendation for approval.
- 17.3 Refer the adoption of the new Equalities Objectives to Full Council with a recommendation for approval.
- 17.4 Note the engagement and consultation that has been undertaken to develop this strategy and supporting action plan to deliver its key priorities. Its content is applicable across the borough and is intended to benefit all our staff, residents and communities and thereby all who live and/or work in the borough, or working directly with Croydon's residents and communities

18. OPTIONS CONSIDERED AND REJECTED

- 18.1 Retain and roll forward existing strategy. Not recommended due to the significant change over the last 4 years, and recognition that we need to have more targeted objectives
- 18.2 Do not have a separate equality strategy, but rely on the equality and inclusion elements in existing strategies (see earlier analysis) – not recommended as it is not best practice and could open us to legal challenge
- 18.3 Delay adopting the strategy and undertake further consultation – not recommended, as we have a legal duty to review objectives every 4 years – which is 2020.

19. DATA PROTECTION IMPLICATIONS

19.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

No

19.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

Data protection impact assessment was completed as part of the consultation process (see appendix 6)

Approved by Gavin Handford, Director of Policy and Partnerships

CONTACT OFFICER:

Yvonne Okiyo, Equalities Manager
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APPENDICES TO THIS REPORT

Appendix 1: Equality Framework for Local Government (EFLG) LGA Report

Appendix 2: Stonewall Workplace Equality Index

Appendix 3: Equality Strategy Consultation Report

Appendix 4: DPIA

Appendix 5: Equality Analysis

Appendix 6: Draft Equality Strategy

BACKGROUND PAPERS: None

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Equality Peer Challenge
London Borough of Croydon Council
Report
4-7 November 2019



1. Background

The London Borough of Croydon (LBC) asked the Local Government Association (LGA) to conduct an Equality Peer Challenge against the “Achieving” level of the Equality Framework for Local Government. This report is a summary of the peer team’s findings. The Peer Challenge is designed to validate a council’s own self-assessment by considering documentary evidence and carrying out a series of interviews and focus groups with employees and other stakeholders.

The basis for the Peer Challenge is a benchmark against five areas of performance. They are:

- Knowing your communities
- Leadership, partnership and organisational commitment
- Involving your communities
- Responsive services and customer care
- A skilled and committed workforce

The Peer Challenge is not an inspection; rather it offers an external assessment by critical friends who have experience of delivering an equality/diversity agenda in their own councils.

Peers were:

Councillor Brigid Jones – Birmingham City Council
Sam Johnson – BCP Council
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The team appreciates the welcome and hospitality provided by the Council and would like to thank everybody that they met during the process for their time and contributions.

Executive Summary

Following this Equality Peer Challenge, we have reached the following conclusion:

The London Borough of Croydon has completed a satisfactory self-assessment against the criteria for the Achieving level of the Equality Framework.

We were impressed by the strong commitment to equality from political and organisational leaders within the Council. The two cabinet members with lead responsibility for equality are seen as highly effective in bringing about positive changes. Member champions for diversity bring energy, passion and leadership on a number of equality issues. In 2014 the Executive Leadership team did not reflect the borough or the workforce. Now it is visually diverse and members of the Executive Leadership team are serving as role models for the rest of the organisation. The Chief Executive is widely credited with accelerating the positive culture change and prioritisation of equality, diversity and inclusion in the Council. Managers across the authority spoke confidently and with excitement about their work to advance equality of opportunity.

There is a clear link between equality, diversity and inclusion and the council's ambitions, from the political administration's manifesto to the corporate plan to cabinet responsibilities. Equality governance is spread across the Council and includes the corporate leadership team, Cabinet, the members' equality and oversight group and staff equality networks. Equality scrutiny mainly takes place when particular policies are taken to a scrutiny committee. However, scrutiny on equality more generally could be strengthened by making one of the existing scrutiny committees responsible for monitoring the outcomes of the equality strategy and achievement of its objectives. The equality staff networks are well supported and are really making a difference to the progression of equality within the organisation.

The Council's support for equality and diversity is visible in the community. It supports and participates in numerous celebrations and events including Pridefest, Mela and Diwali. LBC has strong partnerships with its statutory partners and the voluntary and community sector (VCS). Organisations representing the VCS feel that they are equal partners with the Council and that they are consulted with and can influence the decisions of the Council through the Local Strategic Partnership (LSP). We heard about many good examples of how the Council works well with its partners to deliver services, including the introduction of Integrated Community Networks and community-based multi-disciplinary interventions as part of the One Alliance partnership between the Council, health partners and Age UK Croydon. Another excellent partnership is Croydon Works, a job brokerage partnership between the Council, Croydon College and Job Centre Plus. It was set up to ensure disadvantaged Croydon residents are able to access the job and training opportunities that will be created by the regeneration Croydon is set to see over the next few years.

Use of data is an important and an improving element of the Council's operations. It collects and uses a wealth of data from a wide range of sources including health and

other partners. Data is utilised effectively to support the Council's new localities-based approach to service delivery. Services are starting to be tailored to meet the needs of communities and are responsive in the recognition of the various inequalities, needs, strengths and characteristics in each. This connected community approach is being piloted in three specific areas – North Croydon, New Addington and South Croydon. However, there are still some challenges around data sharing, particularly with health partners.

There are almost 400,000 residents in the borough which is estimated to rise to approximately 445,000 by 2031. Nearly 51.7% of Croydon's residents identify as BAME and reside mainly in the north of the borough. The resident profile of the south is significantly less diverse than their northern neighbours. LBC has a good understanding of its communities, including the BAME community, although we found that this knowledge is not consistent across all services and the Council works hard to involve its community in the development of services. The participation of young people is particularly strong.

The Council is keen to improve access to its services. The Gateway approach focuses on the broader, holistic needs of people and aims to reduce the barriers to and between services. One of its portals, the Family Centre was highly praised by service users and described as "amazing", for its "can do – solution focussed" approach. The Council has plans to improve the customer service at Access Croydon in terms of its physical layout, IT provision and staff resources. Good progress has been made on the plan, and priority should be given to ensuring that funds are available for the remainder of the plan to be implemented without undue delay. Staff reported feeling empowered to be responsive to customer needs but worry about the impact of the time this takes on performance measures and are acutely aware of the limitations of the current offer.

Equality Impact Assessments (EIA) are integrated systematically into service planning and decision making across the organisation. However, the quality of EIAs overall still needs to be improved. The quality of analysis is variable and assumptions are being made in some EIAs where there is no data to support them.

It is very clear that the Council has embarked on significant culture change within the organisation. A staff survey in 2017 found that whilst the vast majority (91%) were proud to work for the local authority, 41% felt bullied, harassed or discriminated against. Workforce data also showed that minority groups such as BAME, people with disabilities and LGBT staff were not representative of the community at senior levels of the organisation.

The council commissioned an external review of its workforce policies and practices, and all 17 of the recommendations from the review – on issues including recruitment, appraisal, codes of conduct and training and development – were incorporated into a new Workforce Strategy. Diverse recruitment panels have been put in place for senior appointments. There is targeted leadership development for BAME and women and plans in place for leadership development for disabled staff. Around a third of staff who have attended these programmes have already been promoted within the organisation. However, the appraisal process, which is no longer linked to

pay, still has an over representation of BAME staff in the lower quadrants. Levels of BAME grievances have fallen but are still too high and black men are still not progressing in the organisation at the same rate as their female counterparts. Further exploration to determine why this is the case should be undertaken and action taken, to address this incongruity.

Rates of non- disclosure about protected characteristics by staff are 34% for all protected characteristics including sex and race. The organisation has undertaken some work to increase disclosure rates and plans to build on this work this year.

The Council offers a wide range of learning and development opportunities for staff around equality and diversity issues with some equality training for new starters and managers being mandatory. Despite this, some staff were not aware of the council's equality objectives, though they had been in place since 2016. This could be addressed as part of the service planning process and with better internal communication via the intranet, team briefings and staff networks and noticeboards.

Staff feel well supported by their managers, but this is not consistent across the whole organisation. We heard that some requests for reasonable adjustments from disabled staff are being treated more as recommendations by managers and not as measures they are required to take. BAME and disabled employees are still disproportionately involved in disciplinary and grievances procedures.

We found some outstanding and even exemplary HR practices and policies. The organisation is Level 2 of "Disability Confident". It pays employees the London Living Wage and encourages other employers in the borough to do the same with its Good Employer Charter. The Council has a low gender pay gap of 1.6%. It also measures disability and ethnicity pay gaps (ahead of legislative requirements, demonstrating that it recognises inequality in pay beyond single characteristics). Croydon was the first council to publish menopause guidance and this has already had positive outcomes in the workplace. The apprenticeship scheme is very accessible and has a high proportion of apprentices with a learning disability. There are good industrial relationships with the Trade Unions, with opportunities to harness the resources of the trade unions to positively contribute to the equality agenda.

2. The Council made the following observations on the impact of the peer challenge:

Croydon has equality and diversity set at the very heart of our borough. We are very proud of our borough, its diverse mix of people and places that makes it a great place to live and work. Our ambition is to ensure growth that benefits all in the borough, and improving equality of, and access to, opportunity. This is set out in our Opportunity and Fairness Commission report, and embedded in

our Community Strategy, Corporate Plan and supporting strategies. The organisation has made great strides in responding to and delivering against the strategies and plans.

Our vision is to be a high performing organisation that is collaborative, inclusive and innovative, that allows talent to flourish and builds our workforce capability to meet our ambitions and reflect our community - where everyone can speak up, speak out and have a voice in the future direction of the organisation - where fairness and justice feel real, and where bullying, harassment and discrimination are not tolerated.

We are proud of the actions we have taken to date and recognise we have much more to do. This is why the Council proactively sought to undertake the Equality Framework for Local Government (EFLG) Accreditation. The process and our external assessment have helped us to identify and confirm what we do really well and where we need to improve.

We would like to thank the peer team for their time and effort and look forward to working with the LGA to drive through our improvement plan and deliver better equality outcomes for our staff, residents and communities.

3. Detailed findings

3.1 Knowing your communities

LBC's operating model is based on six key themes which set out the way the council wants to deliver its services to ensure that it achieves the best outcomes for residents. The first theme is 'evidence is key.' It tasks the organisation with ensuring that data and evidence is used to inform the development of key priorities and future service design. In 2016, the Council commissioned an Opportunity and Fairness Commission (OFC) to survey residents on their feelings about poverty and inequality to examine issues affecting the Borough such as deprivation. The work of the OFC has since supported the Council's ambition to reduce inequality and promote fairness for all communities, leading to the development of the Opportunity and Fairness Plan 2016-2020 setting out the council's equality objectives. This drew on information from the Borough Profile, Index of Multiple Deprivation, as well as the views of 3,000 people including staff, residents, local businesses, community and voluntary organisations.

The Council currently gathers, stores and uses a wealth of data from a wide range of sources including health and other partners, the Croydon Observatory, JSNA, Office of National Statistics, Census, public health data, and locality mapping. There are shared data sets across key partners, for example Job Centre Plus and Croydon Working. The One Croydon Alliance on health issues has shared data protocols and there is parity of esteem amongst its members. Its data informs the Council's localities work. Members have a good understanding of their communities and contribute soft intelligence and information about their wards.

There are still challenges around data sharing, particularly with health partners and some of the Council's data is inconsistent with that of partners. For example, the number of people with a learning disability in the borough and the number of unaccompanied asylum seeker children. Data storage appeared to be somewhat ad hoc and not all in one place or easily accessible to services. The Insight, Data and Performance Team is skilled at challenging stereotypes, recognising gaps in knowledge and double-checking what data is really saying by consulting with communities. There has been an intelligent evidenced based response to issues, for example the Violence Reduction Partnership and the Vulnerable Adolescents Review which has informed real changes in practice. Data is being used to improve services, for example school admissions.

In following the 'evidence is key' theme, the Council recognised that it needed to develop a detailed data picture of each locality area to combat inequality. This led to the development of its localities based working approach as one key response to the effects of austerity and different levels of vulnerability and need in the borough. Data and intelligence are used to determine the priorities in each area. The approach is helping to tailor services to communities most in need. It has involved adapting the way that the Council delivers and commissions services to respond to the various inequality, needs, strengths and characteristics in each of its communities. The approach is being piloted in three areas – North Croydon, New Addington and South Croydon.

There are different levels of equality data collection/use depending on the service. Some services such as Children's and Adults Services are good at using equality data to develop links between services and improve services. For example, data was used to reduce the number of late applications for primary admissions. Following analysis of the data, the group of parents or carers most likely to make late applications for primary school was identified. Specific communication channels and opportunities were used in order to target the groups to reduce the number and increase the opportunity for parents to apply to their first preference school.

Not all managers are confident about interpreting equality data, although there has been some good work to address this. The data team are centrally managed, but they also work closely alongside services department spending part of their time co-located in the areas that they are serving and attending the management meetings of their departments to ensure that data is being shared and the team is focusing on areas of most impact. However, this does not always include sharing equalities data or focussing on areas of equalities need.

LBC does have an understanding of its BAME community but it needs to ensure that it fully understands the diversity of the various communities making up the 'BAME' community, for example Eastern European communities. Given the large numbers of BAME people in the borough it should be possible to present disaggregated data on BAME communities in council documents and other communications. The voluntary and community sector also said that the Council understands the sensitivities of different communities in the borough, for example supporting the use of food shops rather than food banks.

There are some gaps in the Council's knowledge of communities in the borough such as the LGBT+ community. Data in relation to these other protected characteristics seemed to be less well developed and utilised. The data used tended to be quantitative and it was not clear how the Council tapped into more qualitative and experience-based data from harder to reach protected characteristic groups. The authority may want to explore how it can develop better data on less familiar groups using a broader range of methods, including consultation and engaging directly. Engaging with smaller organisations that work with these communities or identifying partners who may already be delivering services in Croydon may help to fill these data gaps.

Recommendations

Ensure that any new systems capture all the protected characteristic data of service users and the community.

Consider how to provide all staff with the skills and confidence to collect and interpret protected characteristic data and understand the importance of that data.

Enable the data teams to share equalities data with service teams so that there is a greater focus on equality impact and need in these discussions.

3.2 Leadership, partnership and organisational commitment

There is strong commitment to equality from political and organisational leaders within the Council. They recognise that more needs to be done but there is a good level of pride and eagerness to learn and improve. Both the Chief Executive and the Leader have an "open door" policy. Member champions for diversity bring energy, passion and leadership to particular issues such as autism, mental health, dementia and BAME. The borough has declared itself a "White Ribbon" borough to highlight the issue of domestic violence. The Leader is a White Ribbon ambassador and a champion for the LGBT community. The Chief Executive is widely credited with accelerating the positive culture change in the organisation. She is seen very much as a role model and staff praised her for her visibility within the organisation and her willingness to talk to staff. There is a visually diverse leadership team which has had a positive impact on staff.

The new administration has led a clear shift in making equality and inclusion a priority. There has also been a strong drive on early intervention and prevention work via the Localities model. There is a clear link between equality, diversity and inclusion and the council's ambitions, from the political administration's manifesto to the corporate plan to cabinet responsibilities. The Corporate Plan 2018-2022 sets out commitments to ensure that no community is left behind. The plan outlines its key priorities, one of which is to continue to eradicate inequality and ensure that Croydon is a place where all have the opportunity to live, work and flourish.

Progress is monitored at the members' equality and diversity oversight group. Cabinet members understand their areas and could talk in detail about what is needed. Both the named cabinet members with lead responsibility for equality are widely praised for their leadership and support of the issue.

Other elements of equality governance at LBC include the corporate leadership team, the six staff equality networks and Cabinet. The Culture Board brings together all that the council does to make sure that it has the right people, with the right skills doing the right jobs to deliver better outcomes for local people. Membership includes the Chief Executive, Executive Leadership Team, Chairs and Sponsors of the Staff Diversity Networks, Equalities Manager and representation from Human Resources, organisational development and communications. The organisation is currently in the process of refreshing its Culture Board. The Council may consider establishing a service level steering group (constituted with Assistant Directors) to ensure that services have equality at the forefront of their work when developing and delivering their service plans. The Council might also consider reviewing the level of resourcing for the corporate equality function to provide some support for the one equality officer.

Opposition members feel much less engaged with the equality and diversity agenda. Those we spoke to said that they would like to be more involved. Several councillors raised concerns about the increased adversarial nature of politics between members and from the public, particularly at Council and planning committee. It is important to ensure that all representatives of LBC live up to its values and behaviours, and support members to do so. The Council wants to encourage people from all parts of the community to take part in civic life as councillors and in the community, but people with a protected characteristic may well be put off if there are obvious tensions and poor standards of behaviour between Council members. Consideration should be given to training for chairs of meetings to recognise and handle inappropriate behaviour. Any efforts to reduce tensions should be on a cross party basis. The Council is aware of the issues that have been raised and are currently addressing them via a governance review. The review is making recommendations around democratic engagement with the population and greater backbench involvement in decision making and policy development.

There is no overview and scrutiny committee with equality and diversity specifically in its remit, although scrutiny committees do take equality issues into account when considering reports. Examples include the workforce strategy, the parking policy and the night time economy. The Chief Executive also takes an annual report to scrutiny that includes equality issues. It is important that scrutiny members continue to consider the equality implications of reports they look at, and the Council could also consider giving one of the existing scrutiny committees the responsibility for scrutinising progress against the equality strategy and objectives.

The Council has strong partnerships with its statutory partners and the voluntary and community sector (VCS). The Council's VCS strategy sets clear priorities for joint work. Despite reductions in Council budgets, its support for the work of the VCS has been preserved. Sector representatives praised the involvement and engagement of

individual council members with the work of their member organisations across the borough. They feel that the Council understands the role of the VCS as a “broker” between the community and the council. They described how they work with the Council to get messages out to their communities at times of crisis, such as after stabbings or hate crimes.

Much of the VCS has also started to adopt the localities model of working. Umbrella organisations for the sector now feel that they have more of an equal voice “at the table” and that they are consulted with and can influence the decisions of the council and other partners via the Local Strategic Partnership. They see themselves as a critical friend to the local authority. They understand that many of the council’s services are now being accessed online but also feel that there needs to be more investment from the council in ensuring that residents have the right digital skills.

There was a general view expressed by most of the voluntary sector organisations we spoke to that the high turnover of commissioning/contract management staff in the council makes relationship management harder to maintain as new staff do not understand their issues. Better handover arrangements would help to alleviate this. Some VCS organisations feel that commissioning officers do not always understand the culture and context they are operating in. They gave the example of complex monitoring for organisations receiving very small amounts of funding. VCS organisations would also like greater clarity on how they can get access to being based in council buildings. They felt that the current system is rather obscure and perhaps based on who you know in the council. We understand the Council is already addressing these two points. Recommissioning of the community fund was designed based on VCS feedback and the monitoring is much lighter for those on lower funding levels. There is a draft policy going to Cabinet, which sets out clear and transparent approach to property and property subsidies.

Procurement and commissioning is being used effectively to deliver equality outcomes. LBCs values are fed into tender specifications. Contracts in excess of £100,000 are assessed with equality metrics. Service providers are required to collect equality monitoring data and provide equality training to their staff. Potential contractors are required to provide apprenticeships where possible for those who are furthest from the job market or from hard to reach groups. LBC has signed up to the Anti-Slavery Charter and the Construction Charter and insist that those who deliver services on their behalf have proper whistleblowing policies and procedures in place to reduce exploitation and discrimination. LBC has been successful in ‘disrupting’ the market which has led to increased wages for carers and better quality adult social care. It asks providers to work to similar objectives through a Suppliers Code which requires suppliers to pay the London Living Wage. This has worked particularly well in the Health Care Sector where it is impacting on BAME people who are over represented in the care sector. Larger council contracts are frequently broken into smaller lots so local companies can get access to them such as pest control and cleaning services.

The Council supports and participates in numerous celebrations and events including Pridefest, Mela and Diwali. It has recognised that celebrating diversity is also a good opportunity to showcase local businesses and boost the local economy. An example of this are the events held in Surrey St Market during Black History Month.

The quality, use and outcomes of Equality Impact Assessments (EIAs) still needs to be improved. Several that the peer team saw lack analysis and assumptions are being made where there is no data to support them. Intelligence from frontline staff is not routinely used to inform analysis. There needs to be earlier engagement with communities about EIAs. Too many EIAs record that, “everyone has equal access to this service” for all protected characteristics. There is concern from opposition members that EIAs are never mentioned at Cabinet and changes to proposals as a result of EIAs are never very evident. The implementation of outcomes needs to be monitored with heads of service and executive directors being held accountable for the outcome.

Recommendations

Consider establishing a service level steering group (constituted with Assistant Directors) to ensure that services have equality at the forefront of their work when developing and delivering their service plans.

Strengthen scrutiny on equality more generally by making one of the existing scrutiny committees responsible for monitoring the outcomes of the equality strategy and achievement of its objectives.

Consider how the council can assess outcomes for contracts in excess of £100,000 using equality metrics as well as contract monitoring in relation to collecting equality information and providing equality training for staff. There is a need for consistency across the organisation and support to ensure this is happening.

Review the level of resourcing for the corporate equality function to provide some support for the one equality officer. Increased organisational capacity would also help to improve EIA monitoring within services.

3.3 Involving your communities

There are some good examples of how the council involves its communities in developing and delivering services. The Get Involved consultation platform enables residents to influence policy making via an app, PC or tablet. There is also more direct engagement, for example staff went out to the Whitgift Centre to consult with the public face to face about changes to the provision of respite services. There was community involvement in the closure of homes that provided overnight respite care services and redirection of funding to the Cherry Hub.

It is important to consult with the broadest possible range of people. We heard from VCS partners and staff that the Council is not talking to the more hidden communities such as LGBT people or people from A8 countries such as Poland and

Latvia. It is also important for less obvious partners to be involved such as young carers in the One Croydon Alliance. Not all consultations have equality impact assessments and this is something the council wants to address. Using equality analysis can help to identify potential consultees who may not be immediately obvious. The Council would benefit from developing links with smaller communities to help inform understanding of their needs and incorporate them into the development of services.

The Council needs to ensure that communities and service users are informed of the outcomes of consultations. We heard from one organisation that they had contributed to consultation for the “Walk in Our Shoes” report, were informed of the subsequent recommendations and felt listened to at the time but were not informed of the outcomes or if any of the recommendations have been taken forward at all.

The participation of young people in representing this group is particularly strong. There are many opportunities for them to be involved in developing and improving services for young people. Examples include the Young Director Apprenticeships, the Forum for Special Educational Needs, the Youth Offending Forum, Total Respect training where young people train council staff and members, the Youth mayor and the Care Leavers Forum. The new Children in Care forum EMPIRE is very active and represents diversity well.

Community Ward budgets are a useful tool for members to get involved and to give local residents a say in how the money is spent in their areas. It might be a good idea for the Council to consider developing some criteria for what the community budgets are spent on to ensure that projects are contributing to their own strategies and meeting the most need in the borough rather than an individual councillor’s preferred project.

The Asset Based Community Development approach is welcomed by some in the voluntary sector as a way of empowering and involving people. Most felt that it was working well. The Council does need to consider that communities with fewer assets might need more support and services.

It will be important for the Council to continue developing its approach to communications to improve access to services. Take up of some services is low, for example, personal payments. The Council should continue to improve and maximise communication channels both internally and externally. It may wish to explore how it can develop engagement opportunities for smaller less visible communities with a protected characteristic, using conversations and smaller scale engagement to help shape its services to those communities.

Recommendations

Ensure that all consultations have an EIA. This is important due to potential legal implications relating to meeting PSED and Gunning Principles. The organisation should also monitor participation on consultation so that they know which communities are not engaging.

Develop links with smaller communities in the borough to provide better understanding of their needs when developing services.

Ensure that communities and service users are informed of the outcomes of consultations.

Develop some criteria for what community budgets should be spent on to ensure that projects are contributing to the Council's own strategies and meeting the most need in the borough.

3.4 Responsive services and customer care

There is a clear intent to link services to the equality agenda. Service delivery plans set out how their services will contribute to the corporate plan and the equality objectives, as well as indicating how equality and diversity data has been used to plan services. Some services are less good at identifying the link with equality, but staff felt that there could be a stronger focus on the equality outcomes of service delivery. Conversations have been held with the community to identify diverse needs that can be met with targeted interventions. Services include credit membership of food shops instead of food banks that sit alongside a range of other frontline services making them more accessible.

The Localities approach is a desire to shift services away from "One size fits all". It is already working in the three areas where there is the most need. Children's Services and Education are moving to locality working to make services more tailored and responsive to local need and address differences. An example of a good tailored project is St Mary's School and pupil referral unit which targets resource to address intense pupil need. As the localities approach is expanded it will be important to ensure that services are responsive to the needs of the whole borough including the south and that the area-based approach doesn't create new inequality. The Council may wish to consider auditing access for people across the borough to ensure that those outside the areas where services have been prioritised are enjoying the levels of access they require.

There are many good examples of how the Council recognises the nuances of its different communities and works well with its partners to deliver services which are meeting diverse needs. For example

- domestic violence groups for Asian women
- knife crime workshops
- early services for children and families linking them to VCS support to prevent crisis.
- work with landlords to create affordable housing and also tackling poor housing

- schools are being encouraged to work in partnership with the Information, Communication, Technology (ICT) sector to improve diversity in the sector
- the dominoes club to engage with afro-Caribbean men
- Tamil men's group
- Refugee Support Centre

We also heard about initiatives the Council is investing in to save money in the future and achieving better outcomes. Unaccompanied young asylum seekers aged 16-18 are being placed in foster care rather than supported living. Although it is more costly, it saves money in the long term and gives better outcomes for the young people because supported living accommodation can become a magnet for exploitation. An Unsuitable Housing fund has been created to provide homes for families where their accommodation is unsuitable and where children might have been taken into care. The initiative keeps families together and has made savings of around £420,000.

There is currently no real sense of how accessible services are across the borough. For example, officers recognise that there is a gap in LGBT+ health provision. They also recognise that they could make better use of Member expertise. Staff also said that they could provide more responsive services if they had more information and insight about other services in the Council. They felt that there should be better communications between departments to improve the customer experience with more sharing of and access to information, within the boundaries of GDPR.

The Council is keen to improve access to its services. Its Gateway approach enables a focus on the broader, holistic needs of people and reduces the barriers between services. One of its portals, the Family Centre, is praised by service users for its “can do – solution focussed” approach. It provides a gateway to a range of services for communities which may not have traditionally engaged with the council or specific services because of cultural or other reasons. One service user commenting about a member of staff said “She did in 5 hours what nobody had done for me in 5 years”. The Council has a policy of sharing buildings with key partners to make access to services easier. For example, the Department for Work and Pensions (DWP) is located at Access Croydon in the Council's main building. Council welfare advisers actively help people with their DWP claims.

There are plans to improve service delivery at Access Croydon in terms of the physical layout, IT and staff resources to provide responsive services and improve the outcomes for the people who attend. An equality audit had identified that staff were working in a hostile environment and that the customer experience was poor. Changes have already been made such as the removal of telephones from walls to make them more accessible and the relocation of the credit union to a more discreet area to provide better privacy for customers. Personal space has been improved to support vulnerable people such as survivors of domestic violence, which has

enabled services to be provided with respect and accessed with more dignity. There is a strong emphasis on developing staff to be able to meet customer needs, for example Family Centre Staff will be training the Gateway Team at Access Croydon making good use of their expertise and good practices to improve services. Staff feel empowered to be responsive to customer needs but worry about the impact of the time this takes on performance measures. The Council should consider whether services to meet equality needs are adequately resourced in the Contact Centre. The opening hours of the Contact Centre 08.00 to 4.00 Monday to Friday may not be responsive enough to all customer needs. We also heard that the out of hours contact facility is not always adequate.

The digital offer, with regard to the existing website, online services and internal systems needs to be more responsive to staff and customer needs. Staff have had an upgrade of their laptops but not to full functionality. Some web pages also need to be better, for example we were told by some staff that the My Account feature does not always work. We understand that staff have high quality equipment and core software - full enterprise suite of Microsoft Office 365 apps enabled, so it may be more an issue of training, capability and behavioural change as opposed to technology issues. The VCS thought that the Council could do more on digital services by providing more training and outreach for residents and taking longer to roll out new systems to enable people to adapt to new ways of working. There is a commitment to address these issues in the Council's Digital Strategy, published in July 2019 which is already being delivered.

Young people are involved in developing services and commissioning suppliers. The Young Commissioners Scheme enables the young people to score services. They are also listened to in recruitment processes. As a result, people like youth workers with lived experience of the young person's issues may be given preference over social workers.

Recommendations

Increase the focus on the equality outcomes of service delivery. Service delivery plans do set out how their services will contribute to the corporate plan and the equality objectives. However, services should not lose sight of the outcomes and the difference that is actually being made.

Consider auditing access to services across the borough to ensure that those outside the areas where services have been prioritised are enjoying the levels of access they require. This would include the south of the borough.

Enhance opportunities for greater communication between staff in different departments. This would allow for more sharing of and access to information, (within the boundaries of GDPR) to improve the customer experience.

Review the opening hours of the Contact Centre as they may not be responsive enough to all customer needs.

3.5 A skilled and committed workforce

It is very clear that the Council has embarked on significant culture change within the organisation. A staff survey in 2017 indicated that although the vast majority (91%) were proud to work for the local authority, 41% felt bullied, harassed or discriminated against.

The Council set out to gather more data and opinions from staff to find out what the issues were and where the barriers to making the workforce more diverse at all levels were. A consultant was employed to work with HR to undertake deep dive investigations and focus groups with staff. The work was overseen by Members. The result was 17 recommendations which have been incorporated into a new Workforce Strategy. Amongst the recommendations were diverse recruitment panels, a new appraisal process and codes of conduct for staff and Members.

The staff we spoke to understand that the Council is on an improvement journey and are proud to work for Croydon and “proud to serve”. They feel that the Council has exceeded their expectations as an employer. In 2014 the Executive Leadership team was all white. Now it is visually more diverse and members of the Executive Leadership team are serving as role models for the rest of the organisation.

Targeted leadership development for BAME and women has already started to see results. 33% of the 75 BAME staff and 37% of women who took part in the programme have either been promoted, seconded or had a new interim post. There are also more opportunities for coaching and mentoring for all staff. The Council is working on reciprocal arrangements with neighbouring boroughs to deliver on the recommendation for diverse recruitment panels. The appraisal process is no longer linked to pay, however BAME staff are still over represented in the lowest quadrants. Whilst levels of BAME grievances have fallen they are still too high. Despite all these initiatives black men still do not appear to be progressing at the same rate as their female counterparts. Further exploration of the reasons for this is required.

The Council has a baseline of workforce data to measure improvements. However, despite a high-profile campaign, rates of disclosure are still very low at around 34% for all protected characteristics, including gender and race. This is unusual as it is more common to have low disclosure for sexual orientation, religion and disability. Problems with the computer system may account for some of this but we also heard from staff that people are worried that disclosure of protected characteristics will impact negatively on them in restructuring exercises or the attitude of their manager. The organisation needs to improve its level of disclosure against the equality monitoring data and it has started to address this. It also needs to review the presentation of workforce data to more easily identify where action is needed. The organisation has been responsive to the previous staff survey by planning to use an external provider for the next survey to reassure staff about anonymity.

Spending on learning and development has been increased to take account of the culture change and new approaches to service delivery such as the localities approach. There are a wide range of learning and development opportunities for staff around equality and diversity issues, such as mental health first aid, and

unconscious bias training. However, there was no planned training around LGBT issues or the development of guidance for the support of transgender staff. Equality training for new starters is mandatory, as are some equality training modules for managers. We found that staff were not generally aware of the council's equality objectives, although they had been in place since 2016. This could be addressed through the service planning process and with better internal communication via the intranet, team briefings and staff noticeboards.

Some staff feel well supported by their managers, but this is not consistent across the whole organisation. Concerns were raised with the peer team that HR policies on sickness, lateness, training opportunities and performance management are not being applied consistently by managers and this is contributing to a sense of inequality and resentment amongst some staff. We heard that some requests for reasonable adjustments from disabled staff are being treated as recommendations by managers and not measures they are required to take. BAME and disabled employees are still disproportionately involved in disciplinary and grievances procedures.

The Council has six equality staff networks covering women, disability, working carers, LGBT, BAME and mental health and wellbeing. They are robust, well supported and are really making a difference to equality in the organisation. Each network has a senior manager as a sponsor and each has a budget of £1,500. They also collaborate on events and other initiatives like the annual diversity conference. This intersectional work could be capitalised further to ensure the outcomes of people are improved. Members of staff network groups felt that their opinions were valued, that they were able to influence the development of policies and working practice. Staff networks say that they have been key to changing the conversations about mental health at LBC. The BAME group had developed their own booklet for its members and to raise awareness and myth bust across the organisation thereby improving relations between those who share a protected characteristic and those who do not. Network groups felt they were recognised for their contributions. Although being active in a network has been incorporated into appraisal processes, frontline staff were concerned that they are not always able to attend staff networks. More early warning about dates of meetings/events would help them to plan their attendance.

There are some examples of good HR practice that is contributing to equality in the Council. The organisation is Level 2 of "Disability Confident". It pays employees the London Living Wage and encourages other employers in the borough to do the same with its Good Employer Charter. The Council has a low gender pay gap of 1.6%. It goes beyond the pay gap legal requirements to also measure disability and ethnicity pay gaps. Croydon was the first council to publish menopause guidance and this has already had positive outcomes in the workplace. The apprenticeship scheme has been a very positive and well planned initiative. It has made good use of relationships with contractors. The scheme is deliberately accessible and has a high proportion of apprentices with a learning disability.

There are good industrial relationships with the Trade Unions and there are opportunities to harness the resources of the trade unions to positively contribute to the equality agenda. The trade unions could also be involved more in developing the council's work on equality and diversity.

It was not clear what arrangements there are for translators and interpreters to provide these services for customers engaging with council services. The Council may wish to explore whether it could use the language skills of its frontline and other staff to ensure quick access to interpreting and translation, whilst ensuring that proper arrangements remain in place when qualified and trained interpreters are required, including for Deaf people.

Recommendations

Undertake further investigation into the reasons why black male employees are still not progressing in the organisation at the same rate as their female counterparts and why BAME staff are over represented in the lowest quadrants of the appraisal results.

Consider ways to increase staff awareness of the council's equality objectives, possibly through the service planning process and internal communication via the intranet, team briefings and staff noticeboards.

Address the inconsistencies in the way HR policies such as sickness, lateness, training opportunities, performance management and reasonable adjustments are being applied by some managers across the organisation.

Ensure that frontline staff are able to attend staff networks, perhaps by giving more early warning about dates of meetings/events to help staff plan their attendance. Increase the opportunities for joint working between networks.

Review the use of translators and interpreters to ensure that the Council is using the most cost effective ways of providing these services.

4. Signposting to good practice elsewhere

Equality Impact Assessments

Rochdale Council has a robust system in place for ensuring that equality impact assessments are undertaken when required and for quality assuring these assessments. It implemented the Mod Gov electronic report management system in June 2014 which ensures that all reports meet Council requirements and are checked and signed off by Legal, HR, Equality, Finance and the Relevant Director of Service before the report proceeds to the relevant committee meeting. Ongoing advice and feedback is provided to managers on the quality of their equality impact assessments.

Contact: Rochdale Borough Council

Social Value Indicators

Good practice examples are Knowsley and Oldham Borough Councils.



Knowsley Social
Value Outcomes Matr

Incorporating equality into business planning



Management cycle
matrix.docx

Specific talent management programme for BME by HMRC and the University of Manchester example. They were both winners in the 2014 Race for Opportunity categories re: staff/workforce.

<http://raceforopportunity.bitc.org.uk/tools-case-studies/case-studies/awards-2014-developing-talent-award-progression-hm-revenue-customs>

<http://raceforopportunity.bitc.org.uk/tools-case-studies/case-studies/awards-2014-transparency-monitoring-and-action-award-university>

London Councils has produced an excellent report on the impact of changes to disability benefits on eligibility for Council services.

<http://www.londoncouncils.gov.uk/policylobbying/welfarereforms/resources/disabilitybenefitreform.htm>

Disability Rights UK has produced guidance for local authorities on inclusive communities and involving disabled people.

<http://www.disabilityrightsuk.org/sites/default/files/pdf/1%20%20InclusivecommunitiesLAguide.pdf>

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Croydon Council: Workplace Equality Index 2020 Feedback

Congratulations on taking part in Stonewall’s 2020 Workplace Equality Index. As an employer that has taken the time to participate, you’ve demonstrated commitment to your LGBT staff and the wider LGBT community. In this report you will find feedback from Stonewall to help you plan your year ahead to drive forward LGBT inclusion in your workplace.

What this report contains

This report is specific to your organisation. It gives you the following information:-

- Your overall score
- Your overall rank, and rank within the local government sector
- Your performance on key questions for bi and trans staff
- Your scores in the ten sections of your submission
- A short qualitative summary of your performance in each section
- Comparison data for different groups of entrants:-
 - All entrants
 - Entrants in the local government sector
 - Top 100
 - Top 100 threshold: those ranked one hundred to eighty-five, typical of organisations newly entering the Top 100

Additional information will be provided to you on the staff feedback questionnaire that you sent to your employees:-

- How your employees responded to key questions about LGBT equality
- How employees of similar organisations in the local government sector and your region responded

How to use this report

Your Stonewall Account Manager will organise a feedback meeting with you to talk through the strengths and weaknesses of your current LGBT inclusion work, best practice and give you tips for action planning in the future. During this meeting, the Account Manager go through the work that is most relevant to your organisation.

You should use this report, along with the verbal feedback from your Account Manager to make the short and long-term changes necessary to drive inclusion in your workplace.

Score and rank	Quick facts
<ul style="list-style-type: none"> • Total score: 101.5 • Rank: 148th • Local government sector rank: 15th • Local government sector entrants: 33 • Bi inclusion score: 47% • Trans inclusion score: 49% 	<ul style="list-style-type: none"> • Over 500 organisations took part • 109 820 people responded to the Staff Feedback Questionnaire • The average Top 100 score is 137.5 • The average Top 100 Bi Inclusion Score is 67% • The average Top 100 Trans Inclusion Score is 60%

Summary and overview

The below table gives you a summary of how you scored across the ten sections of the Workplace Equality Index.

Section	Your score	Total marks	Marks claimed	Marks claimed not awarded	Marks available not awarded	Averages	All entrants	Local government	Top 100	Top 100 Threshold Entrants
1 Policies and benefits	11.5	15	15	3.5	3.5		6.5	6.5	10.5	10.5
2 The employee lifecycle	14.5	27	26	11.5	12.5		10	11.5	17.5	15
3 LGBT employee network group	11	22	22	11	11		9.5	10.5	17	14.5
4 Allies and role models	6	22	15.5	9.5	16		7.5	8	14.5	13
5 Senior leadership	11.5	17	17	5.5	5.5		6	7	12.5	11
6 Monitoring	6	21	12	6	15		6	7	10.5	8.5
7 Procurement	6	17	15	9	11		4	6	10.5	8.5
8 Community engagement	14	20	20	6	6		9	12	15.5	13.5
9 Clients, customers and service users	7	17	14	7	10		6	6	12.5	9.5
10 Additional work	2	2	2	0	0		0.5	1	1	1
Staff feedback questionnaire	12	20	n/a		8		10.5	8	16	16

- **Your score** – the number of points allocated based on the answers and evidence provided
- **Total marks** – the number of points available in that section
- **Marks claimed** – the number of marks that your organisation claimed in the submission[†]
- **Marks claimed, not awarded** – the difference between marks claimed and your score
- **Marks available, not awarded** – the difference between marks available and your score
- **Averages** – mean averages of the scores awarded to...
 - **All entrants** – all organisations, over 500, who entered the Workplace Equality Index 2020
 - **Local government sector** – all organisations which entered in the local government sector
 - **Top 100** – all organisations which ranked in the Top 100 employers
 - **Top 100 Threshold** – all organisations which ranked between 100 and 85, the typical score of an organisation that is newly entering the Top 100

[†] If this number is less than your score this shows that the evidence you submitted is worth more points than you claimed

[†] Referred to in previous reports as 'self-score'

Section 1: Policies and benefits

This section examines the policies and benefits the organisation has in place to support LGBT staff. The questions scrutinise the policy audit process, policy content and communication.

Section	Your score	Total marks	Marks claimed	Marks claimed not awarded	Marks available not awarded	Averages	All entrants	Local entrants	Top 100	Top 100 Threshold
1 Policies and benefits	11.5	15	15	3.5	3.5		6.5	6.5	10.5	10.5

Feedback from your marker

Overall, there's some great work in this section and your policies are LGBT inclusive and consistently so. We need further evidence that the audit process ensures that language is gender neutral and explicitly inclusive of LGBT people in policies (beyond a standard EIA process).

In order to award for explicit bans on discrimination, bullying and harassment and to ensure you are inclusive of all Bi identities, we require explicit examples of homophobic, biphobic and transphobic incidents. The Stonewall 'Inclusive Policy Toolkit' can support with this.

Your notes

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Stonewall opportunities

Best practice guides are available to you, as a Stonewall Diversity Champion for free. Talk to your account manager about how to best use these resources.

Open programmes are available for up to three people from Croydon Council to attend. Trans allies is available in [London on the 28th of April](#) and in [Liverpool on the 25th of June](#). Open Programmes are available as part of the Scotland Empowerment Week from [18th to 22nd May in Scotland and the north-east of England](#).

Section 2: The employee lifecycle

This section examines the employee lifecycle within the organisation; from attraction and recruitment through to employee development. The questions scrutinise how you engage and support employees throughout their journey in your workplace.

Section	Your score	Total marks	Marks claimed	Marks claimed not awarded	Marks available not awarded	Averages	All entrants	Local government	Top 100	Top 100 Threshold
2 The employee lifecycle	14.5	27	26	11.5	12.5		10	11.5	17.5	15

Feedback from your marker

Provision of all-employee training at high rates is good, but some materials are potentially harmful, reinforcing gender binary stigmas against non-binary people, and are bi-exclusionary. It is also useful to include content warnings when slurs are used in communications, even as examples. Anti-discrimination training must make reference to both gender identity and sexual orientation, and not leave participants to join the dots.

In general, it is important to check all communications for trans-exclusionary, bi-exclusionary, and non-binary-exclusionary content.

We would like to see comprehensive information provided at application stage on the organisation's LGBT inclusion commitment and network.

Your notes

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Stonewall opportunities

London Workplace Conference is on the 3rd of April. [Tickets are available](#) for £349+VAT (or at our early bird rate of £309+VAT until the 21st Feb) for public-sector organisations.

Cymru Workplace Conference is on the 14th of February. [Tickets are available](#) for £110+VAT for public-sector organisations. Tickets can be bought on a buy-three-get-one-free basis.

Global dial-in tickets for London Workplace Conference [are available](#) for £50 (or three for £120), with discounts available to Global Diversity Champions.

Workplace Allies is an empowerment programme which [can be booked](#) to be run in-house for up to 36 delegates from Croydon Council.

Stonewall Workshops are available, on topics such as bi inclusion, trans inclusion, allyship, and leadership. Email conference@stonewall.org.uk.

Section 3: LGBT employee network group

This section examines the activity of your LGBT employee network group. The questions scrutinise its function within the organisation.

Section	Your score	Total marks	Marks claimed	Marks claimed not awarded	Marks available not awarded	Averages	All entrants	Local government	Top 100	Top 100 Threshold
3 LGBT employee network group	11	22	22	11	11		9.5	10.5	17	14.5

Feedback from your marker

The LGBT network is clearly both active and inclusive. Good work has been put into bi inclusion and trans inclusion.

Unfortunately, a lot of marks were lost here due to not updating the register of network group activity from last year, so almost all your examples were out of the date range. It is likely that the organisation would have scored highly here.

One issue to raise from the events listed in the 17/18 submission cycle is that bi-exclusionary events (e.g., lesbian or gay men-only) events are not best practice and can easily undo a lot of good bi inclusionary work.

There are some easy to fix issues, to use best-practice terms 'bi' rather than 'bisexual', 'ally' rather than 'heterosexual ally', and 'trans' rather than 'transgender', and to make an explicit statement of non-binary inclusion, possibly expanding the number of elected reps to include a non-binary rep.

Your notes

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Stonewall opportunities

Workplace Allies, Workplace Trans Allies and Workplace Role Models are empowerment programmes which [can be booked](#) to be run in-house for up to 36 delegates from Croydon Council.

LGBT Network Group Masterclass is available in June in Birmingham (email conference@stonewall.org.uk to reserve your place) and on [24th of April in Scotland](#).

Section 4: Allies and role models

This section examines the process of engaging allies and promoting role models. The questions scrutinise how the organisation empowers allies and role models and then the individual actions they take.

Section	Your score	Total marks	Marks claimed	Marks claimed not awarded	Marks available not awarded	Averages	All entrants	Local	Top 100	Top 100 Threshold
4 Allies and role models	6	22	15.5	9.5	16		7.5	8	14.5	13

Feedback from your marker

This section explores the organisation's work around empowering allies to be active in their support of the LGBT community, and empowering LGBT role models to be visible and inspire others. Profiles should state the identities of the profilees, and look to profile a wider range of identities, including bi, non-binary and trans identities. Stonewall can support with developing this area, through creating allies campaigns and programmes, and providing best practice examples of other organisations' role model profiling. Unfortunately, again in this section there were answers without the date provided and examples that were out of the date range – so we couldn't award. For example, none of your role model profiles included specific dates which we clearly ask for.

Your notes

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Stonewall opportunities

Inclusive Future Leaders is a tailored programme designed to form part of a graduate or management training programme, which [can be booked](#) in-house at Croydon Council.

Workplace programmes including [LGBT Role Models](#), [Allies](#) and [Trans Allies](#). They are available as open programmes for up to three people or the programmes can be booked to be run in-house for up to 36 delegates from Croydon Council. Open Programmes are available as part of the Scotland Empowerment Week from [18th to 22nd May in Scotland and the north-east of England](#).

Inclusive Leadership is a newly developed programme which will be made available from May, email empowerment@stonewall.org.uk for more information.

Section 5: Senior leadership

This section examines how the organisation engages senior leaders. The questions scrutinise how the organisation empowers senior leaders at different levels and the individual actions they take

Section	Your score	Total marks	Marks claimed	Marks claimed not awarded	Marks available not awarded	Averages	All entrants	Local	Top 100	Top 100 Threshold
5 Senior leadership	11.5	17	17	5.5	5.5		6	7	12.5	11

Feedback from your marker

There is a highly commendable degree of engagement, particularly at the SMT level, on both general LGBT topics and trans- specific topics.

Next steps are to further engage the board (Council & Cabinet) in LGBT inclusion, particularly in a visible way. It would also be useful to start on some bi-visibility specific work, where the organisation has no submitted work.

Your notes

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Stonewall opportunities

LGBT Leadership is an empowerment programme for LGBT leaders. Our [next open programme](#) is in London 15th to 17th of July, and can be [booked to be run](#) in-house for Croydon Council.

Inclusive Leadership is a newly developed programme which will be made available from May, email empowerment@stonewall.org.uk for more information.

Section 6: Monitoring

This section examines how the organisation monitors its employees. The questions scrutinise data collection methods, analysis and outcomes.

Section	Your score	Total marks	Marks claimed	Marks claimed not awarded	Marks available not awarded	Averages	All entrants	Local	Top 100	Top 100 Threshold
6 Monitoring	6	21	12	6	15		6	7	10.5	8.5

Feedback from your marker

Monitoring is both vital for understanding lesbian, gay, bi and trans (LGBT) employees and their needs. It is vital in this analysis not to conflate LGBT identities. Sexual orientation is distinct from gender identity, and trans people can be straight. It is also important not to conflate being LGBT with being lesbian or gay, and doing so is bi erasure which is a form of biphobia.

The question on sexual orientation is not currently best practice, Stonewall monitoring resources can support with this.

The question currently asked for 'Gender' should be changed as a matter of priority to reflect good practice.

We would like to see staff satisfaction data cut across sexual orientation and gender identity data to ensure the organisation knows whether LGBT staff experiences are worse, the same or better than non-LGBT staff, and for sexual orientation and gender identity to be monitored across pay grades.

Your notes

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Stonewall opportunities

Best practice guides are available to you, as a Stonewall Diversity Champion for free. Talk to your account manager about how to best use these resources.

London Workplace Conference includes a session on monitoring. It is held on the 3rd of April. [Tickets are available](#) for £349+VAT (or at our early bird rate of £309+VAT until the 21st Feb) for public-sector organisations.

Section 7: Procurement

This section examines how the organisation affects change in its supply chain. The questions scrutinise the steps taken to ensure LGBT inclusive suppliers are procured and held to account.

Section	Your score	Total marks	Marks claimed	Marks claimed not awarded	Marks available not awarded	Averages	All entrants	Local	Top 100	Top 100 Threshold
7 Procurement	6	17	15	9	11		4	6	10.5	8.5

Feedback from your marker

Training or guidance given to the procurement team should explicitly include LGBT equality in relation to procurement processes.

Pro-active scrutiny of policies, not just self-certification, is needed for scrutinising potential suppliers' documentation.

Working with local businesses, even outside of the supply chain, is an excellent initiative and very commendable work.

Your notes

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Stonewall opportunities

Best practice guides are available to you, as a Stonewall Diversity Champion for free. Talk to your account manager about how to best use these resources.

London Workplace Conference includes a session on procurement. It is held on the 3rd of April. [Tickets are available](#) for £349+VAT (or at our early bird rate of £309+VAT until the 21st Feb) for public-sector organisations.

Section 8: Community engagement

This section examines the outreach activity of the organisation. The questions scrutinise how the organisation demonstrates its commitment to the wider community and the positive impact it has.

Section	Your score	Total marks	Marks claimed	Marks claimed not awarded	Marks available not awarded	Averages	All entrants	Local	Top 100	Top 100 Threshold
8 Community engagement	14	20	20	6	6		9	12	15.5	13.5

Feedback from your marker

The organisation has a widespread and effective external collaboration strategy. It would be great to see documentation of bi and trans-specific work.

It would also be good to start seeing documentation of outcomes in this area: looking at participant feedback or reach of communications.

It would also be good to see an expansion of the existing good working, enhancing it's impact.

Your notes

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Stonewall opportunities

Your Stonewall account manager can advise on how to maximise your impact with community engagement.

London Workplace Conference includes a session on community engagement. It is on the 3rd of April.

[Tickets are available](#) for £349+VAT (or at our early bird rate of £309+VAT until the 21st Feb) for public-sector organisations.

Section 9: Clients, customers and service users

This section examines how the organisation engages with clients, customers, services users or partners.

Section	Your score	Total marks	Marks claimed	Marks claimed not awarded	Marks available not awarded	Averages	All entrants	Local	Top 100	Top 100 Threshold
9 Clients, customers and service users	7	17	14	7	10		6	6	12.5	9.5

Feedback from your marker

Consultations on service delivery must include specific out-reach to L, G, B & T people: the Stonewall 'Service Delivery Toolkit' can support with this.

Training provided for staff delivering frontline services needs to be brought in line with best practice on trans inclusion. Stonewall can support with this. General D&I training can be insufficient without examples of HBT discrimination.

It is important to identify and address issues that LGBT service-users may have and barriers they may face in accessing services. We recommend that organisations monitor their client and customer base to improve their reach and impact, and that frontline staff are trained on reducing bias and discrimination towards LGBT service-users.

Your notes

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Stonewall opportunities

London Workplace Conference is on the 3rd of April. [Tickets are available](#) for £349+VAT (or at our early bird rate of £309+VAT until the 21st Feb) for public-sector organisations.

Cymru Workplace Conference is on the 14th of February. [Tickets are available](#) for £110+VAT for public-sector organisations. Tickets can be bought on a buy-three-get-one-free basis.

Section 10: Additional work

This section gives outstanding employers an opportunity to share best practice not already awarded elsewhere in the submission.

Section	Your score	Total marks	Marks claimed	Marks claimed not awarded	Marks available not awarded	Averages	All entrants	Local	Top 100	Top 100 Threshold
10 Additional work	2	2	2	0	0		6	1	12.5	9.5

Feedback from your marker

The LGBT+ Allies network engaging with service users in an area disproportionately patronised by LGBT people is highly commendable. This is very pro-active work within the community and links your organisation's corporate work with the community work of your organisation's stakeholders. Other claimed activities fall within the areas already claimed by the organisation.

Your notes

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Stonewall opportunities

Many organisations have innovative ideas for LGBT inclusion. The Stonewall Empowerment Team can work with you to design bespoke and tailored events, workshops, webinars and programmes. Email empowerment@stonewall.org.uk to discuss your ideas.

Staff Feedback Questionnaire

This section examines the policies and benefits the organisation has in place to support LGBT staff. The questions scrutinise the policy audit process, policy content and communication.

Section	Your score	Total marks	Marks available not awarded	Averages	All entrants	Local	Top 100	Top 100 Threshold
Staff feedback questionnaire	12	20	8		10.5	8	16	13.5

Stonewall opportunities

Stonewall Workplace Conferences have expert workshops and unique networking opportunities. This gives you the holistic tool to deal with the diverse and varied issues that your LGBT staff and their allies face. London Conference is on the 3rd of April. [Tickets are available](#) for £349+VAT (or at our early bird rate of £309+VAT until the 21st Feb) for public-sector organisations. Cymru Conference is on the 14th of February. [Tickets are available](#) for £110+VAT for public-sector organisations. Tickets can be bought on a buy-three-get-one-free basis.

Your priorities

This is a space for you, in collaboration with your account manager, to set objectives for the year ahead.

Your Priorities	What would success look like in a year?	What is a six-month milestone?	What resources or senior buy-in do you need?	What specific steps can be taken to achieve it?
<i>E.g., improve the working environment for bi employees</i>	<i>E.g., increase by 50% the number of bi employees who are comfortable to disclose to colleagues</i>	<i>E.g., three intranet campaigns raising awareness of bi issues with clear opposition to biphobic discrimination</i>	<i>E.g., agreement from internal communications and agreement from the Head of D&I</i>	<i>Organise meetings with the Heads of Internal Communications & D&I Write copy for the first intranet post</i>
Priority one:				
Priority two:				
Priority three:				

Equalities, Diversity and Engagement strategy
Policy & Partnerships

Summary

Following the Croydon Opportunity and Fairness Commission set up to identify issues of inequality supported by lived experiences from residents across the borough and the council's equalities objectives created alongside this, the Council has set out develop a new set of objectives and an equalities strategy that will help the Council tackle inequality in Croydon and work towards a place where all have an equal opportunity to prosper. This will also help the Council to fulfil its statutory obligations under the Equality Act 2010.

The purpose of this document is to set out the process used to develop an Equality strategy and equality objectives for Croydon and report on the findings from the engagement and consultation that was undertaken as part of the process of shaping the strategy.

Carrying out engagement and consultation allowed us to gain an insight into the views of our residents, communities and staff across the Borough and all nine protected characteristics as defined by the Equality Act. This is absolutely crucial to ensure that when we develop our objectives and actions, they are meaningful and impactful for all the residents we serve.

Purpose of consultation

The purpose of this consultation was to seek internal and external stakeholder input to help test our existing equality objectives, identify where our priorities should lie going forward across the nine protected characteristics, extending to socio-economic circumstances which have a considerable impact on inequality, inclusion and quality of life. We also wanted to use the opportunity to gather views on what the Council does well and what it can do better to reduce inequalities in the Borough.

We found that although most people agreed with the current objectives, some of the most important issues for respondents were not included in the objectives and there were many issues that have arisen in the last 4 years. Responses that focussed on new or 'emerging issues' – areas not covered by the current objectives' – were classed as 'emerging themes'.

Engagement process

Engagement and Consultation started during the lockdown phase of the COVID-19 pandemic. This provided us with some challenges and restrictions as the usual channels - such as face to face workshops or VCS engagement events - could not be utilised. We also had to adapt regular communication channels. We ran four promotion campaigns on the Council's social media – i.e. Facebook, Twitter and Instagram between July and September. We have also advertised opportunities to get involved on the intranet, in the weekly newsletter Your Croydon and weekly Our Croydon bulletin, which gave us the potential to reach in excess of 80,000 residents.

Consultation Analysis: September 2020

To make sure that the engagement captured a broad audience, we engaged with and targeted a range of different groups in order to gain the broadest and most representative sampled possible. In order to achieve this we undertook the following actions:

- Ensured that engagement complied with social distancing guidelines
- Emails were sent to local organisations, partners, VCS, businesses and other related networks inviting them to participate and get involved (including researching and reaching out to groups with specific connections to protected characteristics)
- Key services were asked to share information about the consultation to their networks
- Online focus group dates were published in community, service and other newsletters and organisation specific journals
- Partners advertised opportunities to get involved on their web pages and in their local correspondence to service users/members
- Croydon Vision shared consultation details with the visually impaired community
- Schools were invited to take part
- Croydon and John Ruskin Colleges advertised the consultation details on online notice boards and micro portals
- The Council's social media platforms and service newsletters– including CVA, ARCC, CNCA, Faith Together, and Croydon's Music School
- Councillors who have considerable knowledge of local communities and local community groups were asked to raise awareness through their own networks and contacts, and to share contact details for specific groups that should be approached to engage in the consultation
- We consulted with residents across the Borough, taking into account the diversity and the needs of all residents across protected characteristics as defined by the Equality Act. We ensured our consultation activities targeted residents with protected characteristics so their voices could be heard.
- We ensured that we consulted with VCS organisations that were representative of all communities across the Borough and support some of the most vulnerable residents.
- We ensured that staff across all protected characteristics and across all levels in the organisation were consulted. This also included Cabinet Members and Councillors.
- We also ensured engagement opportunities were flexible – including late evenings and Saturdays to accommodate wider participation of protected groups. 1-2-1 telephone calls would be at the convenience of respondents and often involved filling out the online survey if they were unable to themselves or reluctant or unable to take part in online focus groups
- The hardest to reach protected groups have been those within the transgender community and pregnant women. In part, this was due to the fact maternity clinics

Consultation Analysis: September 2020

were not being held in the usual manner. We therefore approached partner organisations to promote the opportunity and contacted all known local transgender groups.

3 types of engagement were used to collect feedback:

1. Online survey

The online survey was developed and launched using the Council's 'Get Involved' platform. The site has software adjustments for those with visual impairments. The online survey/questionnaire was designed as a 'perception' survey that allowed respondents to give us their views on how the Council is tackling inequality, comment on current equality objectives, and suggest additional objectives and priorities the Council should focus on for the next four years. We had a total of 254 survey responses.

2. Online workshops using Microsoft Teams and Retrium

The online workshops asked the same questions as the online survey, with responses captured anonymously using an online tool called Retrium. By using this tool we were able to encourage more open and honest feedback while protecting individual identities during workshops. As a result, feedback from the workshops was much more granular, honest and practical than one might otherwise expect.

In total we hosted 30 online workshops with attendees across the 9 protected groups. (Note: no person, community group or organisation was required to declare an interest)

On average virtual workshops were attended by between 5-6 attendees with the exception of the BME Forum and ARCC workshops, whose sessions were at capacity. Online workshops were also held with staff in their capacity as employees, residents and service providers. Lastly, there were also meetings held with each of the staff diversity networks

3. 1:1 telephone / Microsoft Teams interviews.

We also held twelve 1-2-1 telephone interviews for those unable or unwilling to use online channels where we asked the same questions as the online survey. This represented a more cost effective and direct approach than postal methods, which have been discounted.

In order for the feedback to remain consistent, the following five questions were asked across all forms of engagement:

- *How successful has the council been in tackling and reducing inequality*
- *Do you agree with the current aims? (each detailed individually)*
- *Do you think there is anything missing from the current aims?*
- *Which area amongst the current aims is most important to you and why?*
- *Which key area do you think the Council's strategy should focus on?*

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The information collected helped us test whether the current objectives were still relevant and see what had changed, as well as helping to identify emerging themes and the areas residents and staff would like to focus on going forward.

Engagement breakdown

Detailed below is the amount of people engaged throughout the different types of engagement used during this consultation:

- **Online survey Responses:**

254

- **Workshops & 1:1 interviews - staff, community groups & residents:**

Total number of workshops: 30

- **Infrastructure groups engaged:**

- BME Forum
- ARCC
- CVA
- Faiths together

- **Total number of participants:**

334

What did we consult on?

Throughout this consultation we tested the current council equalities objectives, what they felt was missing from our current objectives and what other issues relating to inequality people were most concerned about. Below are the objectives that we tested on:

1	Jobs and the economy	To increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market
2	Housing	To increase the support offered to people who find themselves in a position where they are accepted as homeless especially those from BME backgrounds and women

3 4	Children and families	To reduce the rate of child poverty especially in the six most deprived wards To improve attainment levels for white working class and Black Caribbean heritages, those in receipt of Free School Meals and Looked After Children, particularly at Key Stage 2 including those living in six most deprived wards
5 6 7	Community safety	To increase the percentage of domestic violence sanctions To increase the reporting and detection of the child sexual offences monitored To reduce the number of young people who enter the youth justice system
8	Social isolation	To reduce social isolation among disabled people and older people
9	Stronger communities	To improve the proportion of people from different backgrounds who get on well together
10	Health	To reduce differences in life expectancy between communities

We also wanted to find individuals views on what the council does well to tackle inequalities in the Borough and more importantly, what we can do better.

What else did we consider?

A number of national studies / reports have been produced in recent years which provide a helpful insight into inequality across the country in the twenty-first century. We also identified and benchmarked against best practice and reviewed a range of plans and strategies as part of the process of the analysis process. In order to create as full a picture as possible we consulted:

Local and national evidence.

As part of the strategy development process, we have examined a range of qualitative and quantitative evidence to develop our strategy. Below is an outline of the evidence sources that we have tapped into as part of the process of developing the strategy and not intended to be exhaustive list:

- Is Britain Fairer? The state of equality and human rights (Equality and Human Rights Commission)
- Health Inequality in England – The Marmot review 10 years on (Institute of Health Equity / Health Foundation)
- Beyond the data: understanding the impact of COVID-19 on BAME groups (Chief Medical Officer for England)
- Public Health England - COVID-19 understanding the impact on BAME communities
- Croydon Observatory
- Croydon Borough Profile

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- LGBT Draft Needs Assessment
- COVID 19 - Community Report ARCC (May 2020)
- COVID 19 - Community Survey Report ARCC (May 2020)
- Croydon COVID-19 Caribbean Community Health and Wellbeing Survey (Aug 2020)
Croydon BME Forum
- Ethnicity and COVID-19. The Croydon Experience and Analysis (May 2020) Rachel Flowers & Nnena Osuji

Best practice across the public sector and in particular other local authorities

Below is an outline of the evidence sources that we have tapped into as part of the process of developing the strategy and not intended to be exhaustive list:

- Mayor of London Strategy
- Bristol Equality Strategy
- York Equality Strategy
- Birmingham City Council Equality objectives

The following is a sample of the more recently developed strategies and not intended to be an exhaustive list:

Strategy Name	Protected Groups
Corporate Plan 2018/22	All protected groups
Workforce Strategy 2019-2022	All protected groups
Refreshed Recruitment Policy	Race, Disability, Gender
Schools Improvement Plan	
Croydon Partnership Early Help Strategy 2018/20	Age; Disability; Gender
Joint Health & Wellbeing Strategy 2018/22	Age; Disability; Pregnancy Maternity; Gender
Autism Strategy	Autism, Disability
Housing Strategy	All protected groups
Economic Recovery Plan	All protected groups

Feedback summary

This report will detail all of the findings from our consultation. Below are some of the high level findings.

- Respondents agreed with the current equalities objectives.
- Respondents also felt that the current objectives did not cover all of their concerns.
- In the last 4 years, people's concerns around equality have changed and there are a plethora of new and emerging issues.
- Across different groups and protected characteristics there are numerous different concerns related to personal circumstances, however there are many key issues that are consistent across these groups.
- Overall, a high proportion of respondents felt that the aims should be measurable and progress should be made easily available for all residents to access.

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- Respondents felt that the new priorities should also contain information specifically related to the council's role in tackling and reducing inequality.

Below is a further breakdown of feedback in relation to the key themes, including existing themes and emerging themes:

Jobs and the economy

Across all three forms of engagement, issue pertaining to jobs and the economy were raised by respondents. Specifically, feedback referenced the need for the council to support those who have been financially affected by COVID-19, such as elderly and disabled people, and the need to support people back into employment, as well as job retention. Additionally, respondents recognised the development that has taken place in Croydon in the last decade and spoke of the importance of ensuring that all residents feel the benefit of the development, particularly in overcrowded areas such as Thornton Heath.

Housing

Also related to feedback on jobs and the economy, respondents pointed out the need for more affordable housing across the borough for its poorest residents. Respondents emphasised the need for this in the north of the borough. Respondents also saw the need for housing to be allocated in a fair and equitable way, to ensure there is no discrimination against particular groups. Finally, feedback also focussed on the need to tackle homelessness, and particularly for BAME men in the borough, who are more likely to end up being classed as homeless. These responses were often related to the way in which homelessness has been tackled in during COVID-19 and how efforts should continue to eliminate homelessness both nationally and in the borough.

Children and Families

Much of the feedback related to children and families could be seen against the backdrop of the Black Lives Matter movement and societal inequities that have been a national issue for some time. Amongst these issues, the most prevalent within the feedback was the treatment of young people by police and in education, and the lack of youth services on offer for young people in the borough. Respondents raised concern with violence amongst young people, but also the treatment of young BAME people in Croydon and in London. This was often related to the fact there are not enough youth services - particularly those focussed on employability and life skills - on offer for young people. In education, there were also concerns raised regarding the differences in exclusion rates for young BAME people and the differences in education outcomes across different groups.

Community Safety

Although community safety was not as common a response amongst other issues, there were still concerns with particular issues within the borough. Respondents in the survey questioned the usefulness of the domestic violence aim from the 2016 OFC report, sighting that it did not address the root cause of domestic violence. As above, youth violence was also sighted in

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responses from young people who took part in the workshops, who spoke about the feeling of a lack of safety amongst young people in the north of the borough.

Social isolation

Social isolation was often referenced as being linked to many other issues throughout the consultation. For example, when people spoke of disability access and service improvement for autistic people, respondents also pointed out the detrimental effect these issues can have on mental health, by making people feel isolated. Additionally, respondents who referenced COVID-19 as a chief concern also spoke of how this has been a key contributor, and will continue to be, towards people feeling isolated in the borough. This was particularly in relation to older people, disabled people and those who have become unemployed. Respondents recognised the importance for community support and an active voluntary sector, supported by the council, to help alleviate social isolation for these groups.

Stronger communities

Throughout the consultation stronger communities was pointed to as something that can be achieved through a combination of factors. Respondents recognised the importance of a thriving VCS in the borough and how this can engage different groups in different communities. Further to this, a common theme raised were the societal inequities across different groups in Croydon, and for there to be a partnership effort between VCS, local community leaders and the council to bring these groups together more often than just for one off events. This was often related to the idea that there is a north-south divide within Croydon.

Health

The main issues raised with regards to health were autism, disability and health inequalities. In relation to autism, there was strong feeling amongst a large number of respondents that there needs to be more training and awareness and for an increase in support and services, both in the council and across the borough. Disabled access was also a chief concern amongst many respondents, with Bernard Wetherill House, local shops, and high streets raised as examples of where this can be improved. It was also recognised that council services need to be available in a variety of forms for people of all age, health and disability. Health inequalities were also raised, particularly in relation to the differences amongst different groups and communities.

Societal inequities (emerging theme)

Much of the feedback in the survey and workshops reflected the context in which this strategy is being devised. Thus, many respondents saw the need for societal inequities to be addressed in the strategy. In the survey, respondents saw the need for more equitable treatment of groups across the country and in Croydon, particularly the BAME. For some of the respondents the phrase 'BAME' was offensive in the way that it treats different groups of people from different backgrounds as one homogenised group. Although strength of feeling between respondents differed, there was a common opinion that societal inequities are a national and international issue and cannot be addressed in Croydon in isolation. Having said

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this, other respondents disagreed and wrote that Croydon must work with its partners, including the Police and Schools in order to address problems in Croydon.

Council as an employer (emerging theme)

Most of the feedback focussed on the council as an employer came from council employees, but also from residents of the borough. Having a diverse workforce was seen as one of the council's strengths, however by others, it was also observed that decision-making positions are not held by as diverse a group of people as the council as a whole. Many respondents emphasised the importance of having a diverse management team to reflect the diversity of the borough. Some residents in the workshops were of the opinion that the council must first of all correct its internal equalities policy and procedures so as to set an example for the rest of the borough. Many respondents agreed that this would involve increasing training and awareness of staff.

Council as a community leader and service provider (emerging theme)

Response relating to this emerging theme tied together many of the other themes. As above, some respondents felt that the council's role as an employer, and the fact over 50% of staff are Croydon residents, means we are in a unique position to set an example on equalities for other employers and businesses in the borough. In the workshops, council employees recognised the need to build equality into the commissioning process and use this to create strong partnerships across the borough. Additionally, many respondents in the survey felt that service delivery models should reflect the inequities across the borough. Overall, many respondents feedback that the council should use its role in the community to speak out about inequality and work together with partners to create a more equal borough for all Croydon residents

Online survey findings

The online survey was live from June 11 – September 20. During this time there were 254 responses. Survey, responses were categorised based on the themes of the current equalities objectives as below:

1. Jobs and the Economy
2. Housing
3. Children and Families
4. Community
5. Safety
6. Social isolation
7. Stronger communities
8. Health

Responses seen to lie outside of these themes were classed as an 'emerging theme'

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This section will provide a breakdown of the demographics of respondents, overall responses to each question. Cross-tab analysis is available in appendix 1, where there were noticeably different responses across different groups.

Who responded to the survey?

Age

[170 respondents]

Under 18	9.41%
18-30	17.06%
31-40	20.59%
41-50	34.71%
51-60	13.53%
61+	4.71%

- The majority of respondents were 30+. In order to engage young people we invited schools across the Borough to take part, worked in partnership with Croydon and John Ruskin Colleges who advertised the consultation details on online notice boards and micro portals invited to take part and run workshops with the Youth Parliament and the organisation Empire (who represent Young Care Leavers)
- 1:1 telephone interviews were also offered for anyone who was not able to fill in the online survey due to lack of resources or accessibility problems

Gender

[170 respondents]

Female	65.29%
Male	25.29%
Non-binary	1.18%
Prefer not to say	5.29%
Prefer to self-describe	2.35%
Transgender	0.59%

- There were more female participants than male participants in the survey by a significant margin. The split between male and female in the borough is believed to be 48.6% male and 51.4% female (Croydon observatory). Despite this a large of men also participated in the workshops giving a large sample size of both men and women when all considered
- Although there is no population data in Croydon for the transgender community, all known transgender groups were contacted to take part, and a workshop was held with the LGBTQ staff network group

Disability

[170 respondents]

No	72.94%
Prefer not to say	4.12%
Yes	22.94%

- A large number of people with disabilities completed the survey, reflecting the numbers of groups engaged with across the VCS sector, including Croydon Disability Network and Croydon Vision, as well as the disability staff network

Ethnicity

[170 respondents]

Any other Asian background	1.18%
Any other Black background	1.18%
Any other Mixed / multiple ethnic background	2.94%
Any other White background	10.00%
Arab	1.18%
Black African	8.24%
Black Caribbean	16.47%
Chinese	1.18%
Indian	2.94%
Other, write in:	6.47%
Pakistani	0.59%
White and Asian	1.18%
White and Black African	0.59%
White and Black Caribbean	4.71%
White English / Welsh / Scottish / Northern Irish / British	39.41%
White Irish	1.76%

- The highest percentage of any ethnic background to complete the survey was 'white English/Welsh/Scottish/Northern Irish/British' (39.41%). It is estimated Croydon's population is 55.1% 'white' (Croydon observatory). Following this, 16.47% of respondents were Black Caribbean.
- In order to engage as wide a range of ethnic groups as possible, many community and VCS groups were engaged, and additional workshops were held for Asian Resource Centre Croydon and Croydon BME Forum. This was particularly important given the nature of the strategy. We also recognise there is still more to be done to ensure that larger amounts of each group are engaged in future consultations.

Religion

[170 respondents]

Christian	48.82%
Muslim	4.12%
Hindu	
Jewish	2.94%
Sikh	
Buddhist	.59%
Atheist	5.29%
Agnostic	2.94%
No Religion	28.82%
Other	6.47%

- The number of respondents who stated they were Christian (48.82%), translates roughly into the estimated Christian population of Croydon (56.4%)
- All other major religious groups were engaged with, as well as workshop held and information shared with Faiths Together in Croydon
- This is also in recognition of the fact that members of the Sikh and Hindu community did not participate in the survey. This is addressed in the actions for the council moving forward whereby it is ensured that in future, all groups are fully engaged with, including the harder to reach groups in the community

Sexual orientation

[170 respondents]

Heterosexual/Straight	74.71%
Gay/Lesbian	5.88%
Bi-Sexual	5.29%
Any other sexual orientation	2.35%
Prefer not to say	11.76%

- Although there is no available data for sexual orientation in the Croydon population, it was ensured that LGBTQ groups were engaged in the process, and Croydon is an enthusiastic support for Croydon Pride, as well as actively working to achieve all recommendations put forward by Stonewall.

Marital status

[170 respondents]

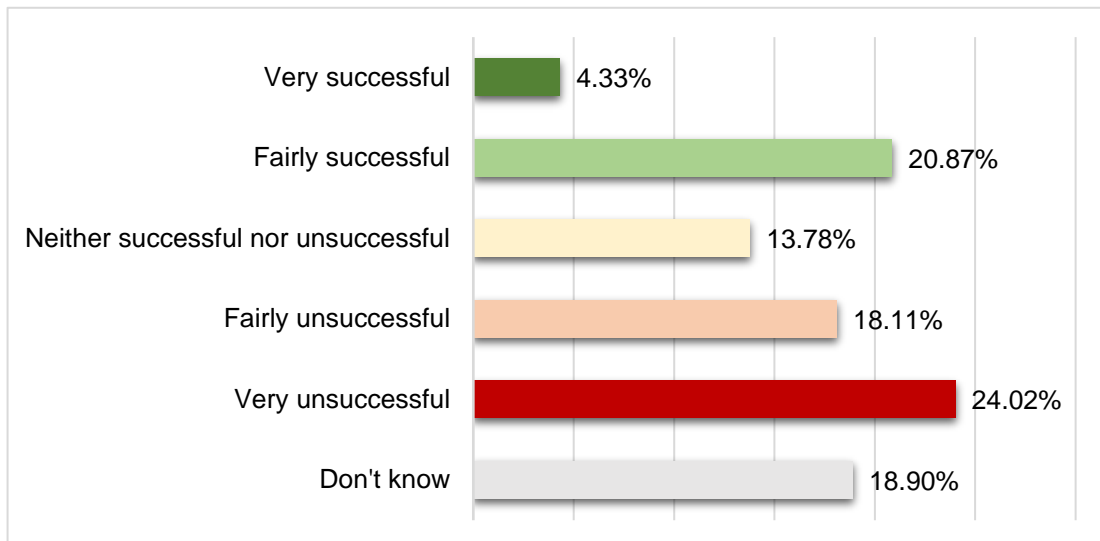
Married or in a same sex civil partnership	37.06%
Single	35.29%
In a relationship	16.47%
Other	11.18%

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- The survey produced good numbers of feedback from all marital status groups

Survey question 1: *Please rate how successful or unsuccessful you think the council has been in tackling and reducing inequality*

[254 respondents]

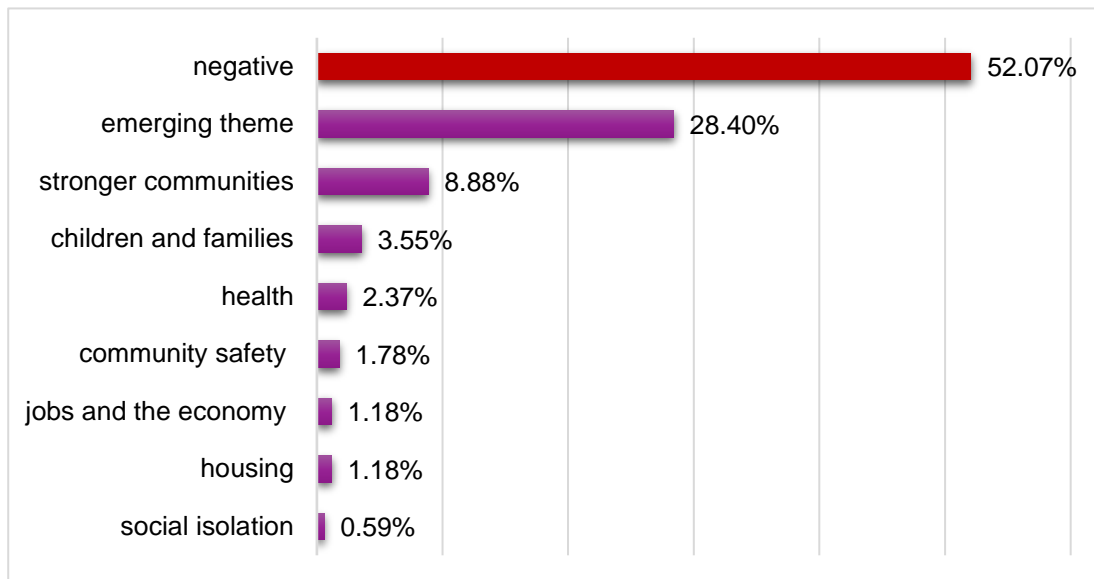


- Overall, respondents had a more negative view of the council's efforts to tackle and reduce inequality than positive.
- 25.2% responses were positive ('very successful' or 'fairly successful'), whilst 42.13% were negative ('very unsuccessful' or 'fairly unsuccessful')
- A significant number of respondents chose 'don't know' (18.90%), which indicates that the council should improve its communication to residents and staff around work that is being done to tackle and reduce inequality.

[Please find further cross-tab analysis of question 1 in appendix 1]

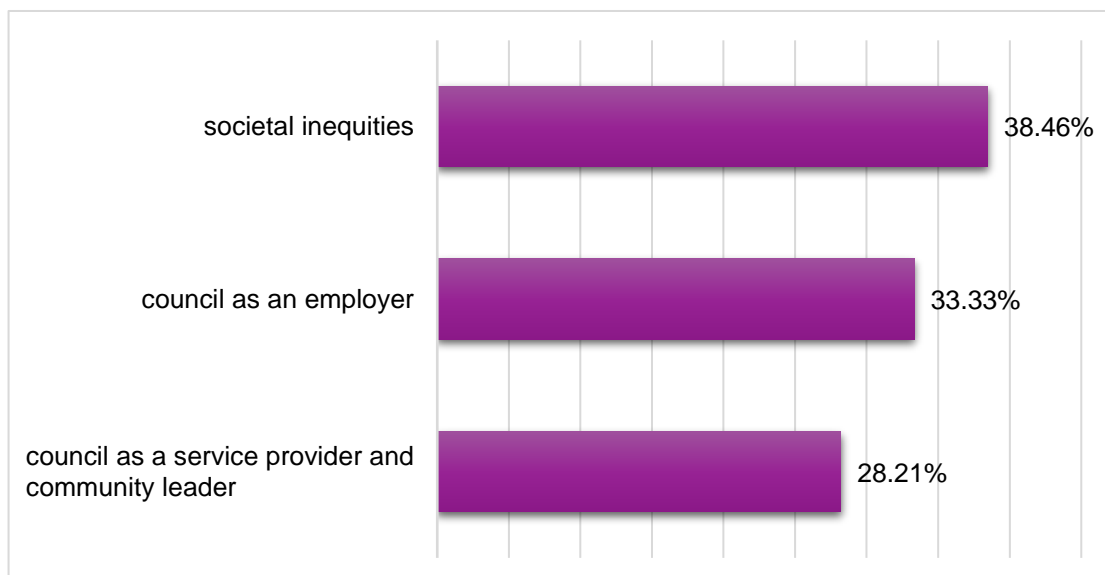
Survey question 2: *Please explain your response to Q1: What do you think the council's strengths are in tackling and reducing inequality?*

[188 respondents]



- The most common responses to this question were either negative (52.07%) – the response did not praise the council in any way but offered criticism – or they were left blank. This reflects the negative responses captured for question 1 and suggests respondents saw question 2 as an opportunity to elaborate on their previous response.
- Following negative responses, the most common response by a significant margin was 'emerging theme' (28.40%) (These responses will be broken down further below).

Breakdown of emerging themes



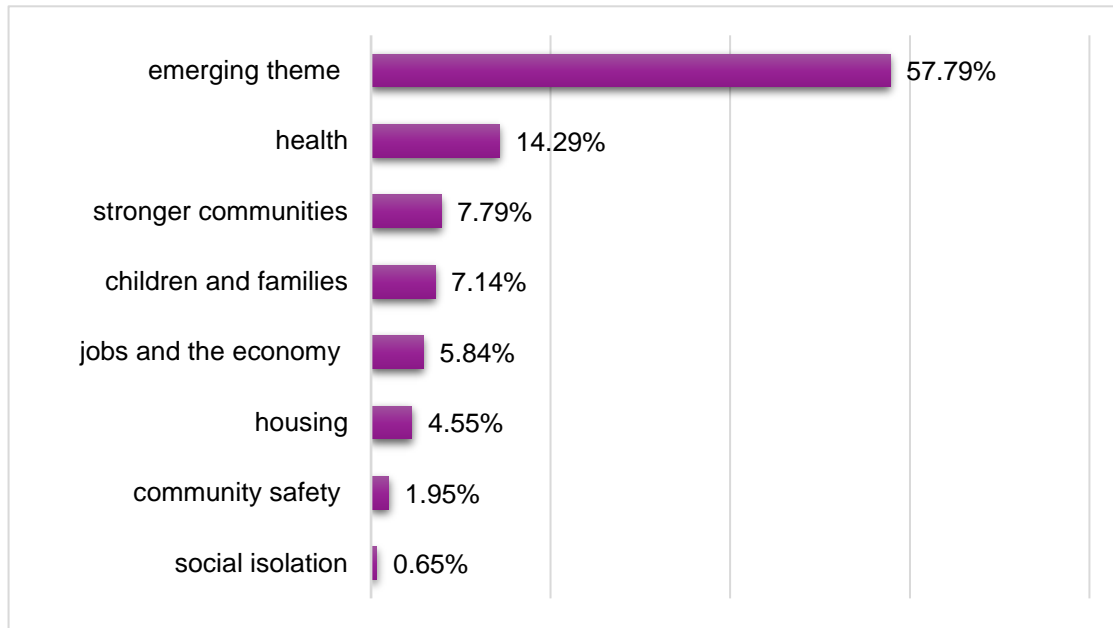
- Of the 28.40% of people whose response was categorised as an emerging theme, the most common theme was 'societal inequities' (38.46%), followed by 'council as an

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employer' (33.33%) and finally 'council as a service provider and community leader' (28.21%).

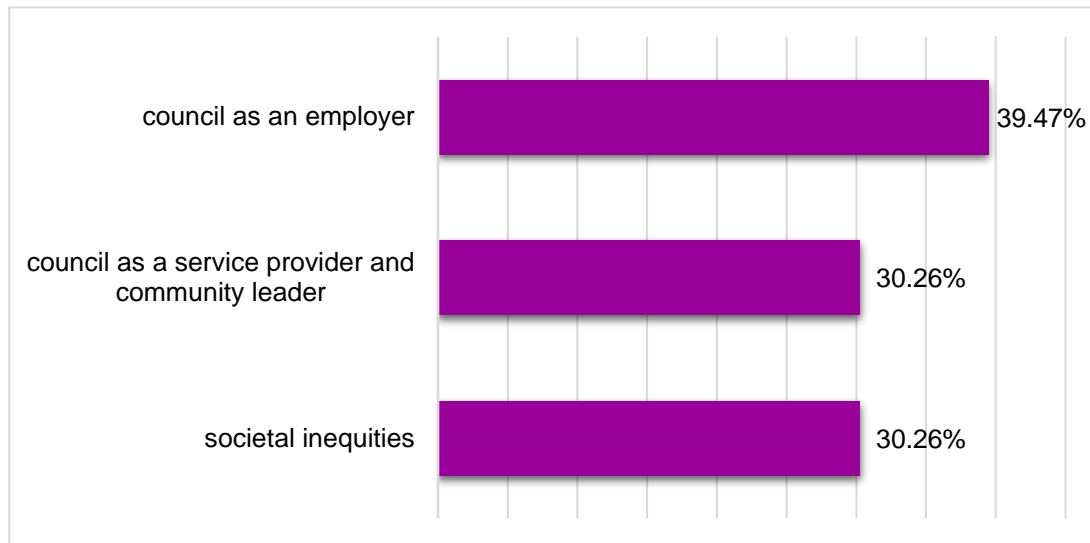
Survey question 3: What do you think we can do better to tackle and reduce inequality?

[179 respondents]



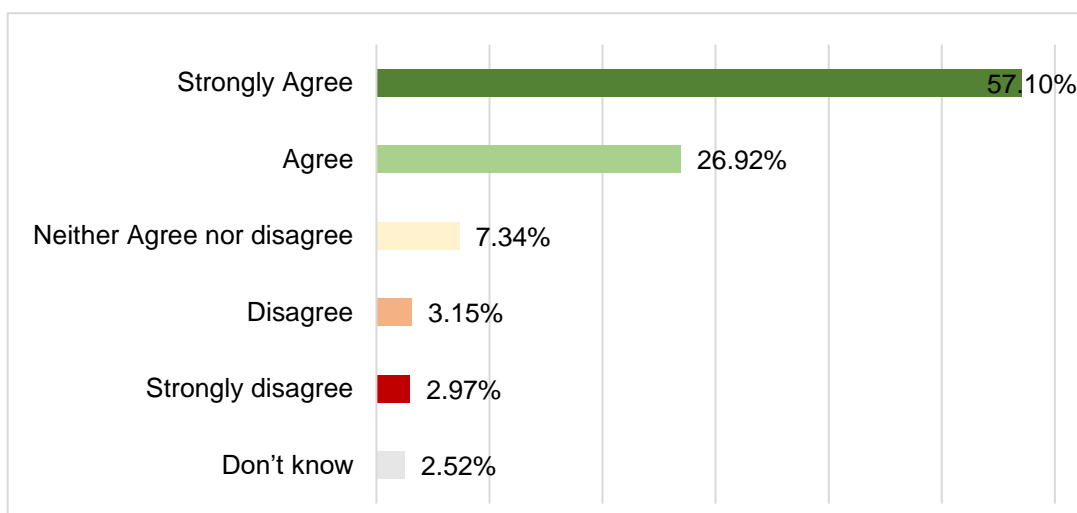
- The most popular responses to question 3 were 'emerging themes', with over half of responses (57.79%) in this category.
- The second most common response was 'health' (14.29%) followed by 'stronger communities' (7.79%).

Breakdown of emerging themes



- Of the 57.79% of responses that were categorised as an 'emerging theme' 39.47% were focussed on the 'council as an employer'.
- This differs to the breakdown down of emerging themes for question 2, where the council's strength was seen as 'societal inequalities'.
- This data suggests that respondents view the council's strength as actions related to 'societal inequalities' and its weaknesses related to employment.

Survey question's 4-13: Do you agree with our current aims?



- Overall, respondents agreed with the current aims

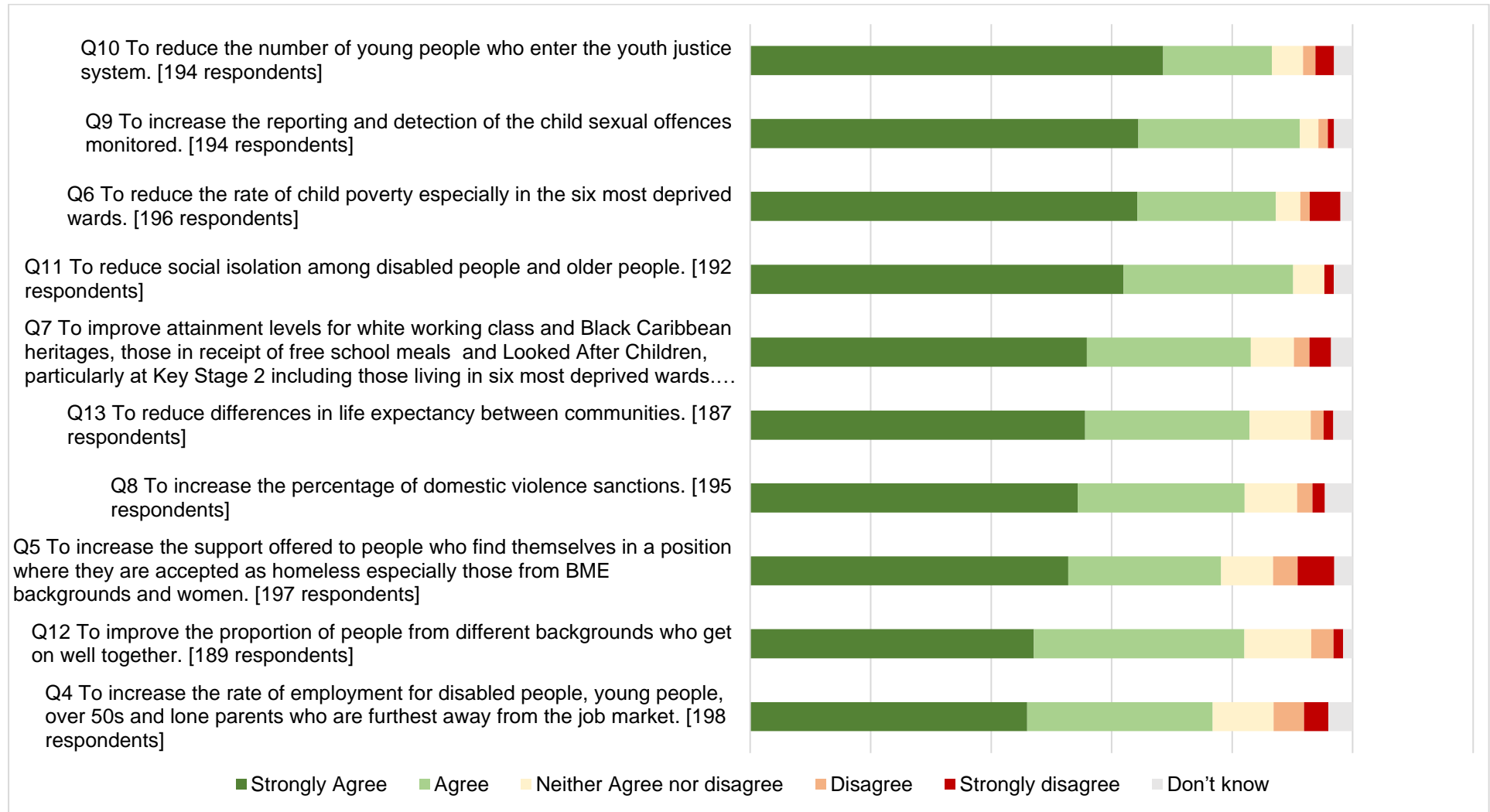
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- In total, 59.62% of respondents chose a positive response ('strongly agree' or 'agree') and 6.12% chose a negative response ('strongly disagree' and 'disagree')
- It is important to also take into account responses to the following questions in the survey, which asked respondents what was missing, and to choose their key area. There was strong feeling amongst these responses that although the current aims are generally agreeable, people were curious about what specific actions the council and its partners can take in order to achieve the aims.

[please see next page for further breakdown of response per aim]

Survey question's 4-13: Do you agree with our current aims?

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- **Overall, the three aims that people agreed with the most (most 'strongly agree' and 'agree' responses) were:**
 1. To increase the reporting and detection of child sexual offences monitored (Q9) (91% 'strongly agree' and 'agree')
 2. To reduce social isolation among disabled people and older people (Q11) (90.11% 'strongly agree' and 'agree')
 3. To reduce the rate of child poverty, especially in the six most deprived wards (Q6) (87.25% 'strongly agree' and 'agree')

 - The aim that received the most 'strongly agree' responses was:
 - To reduce social isolation among disabled people and older people (69% strongly agree)

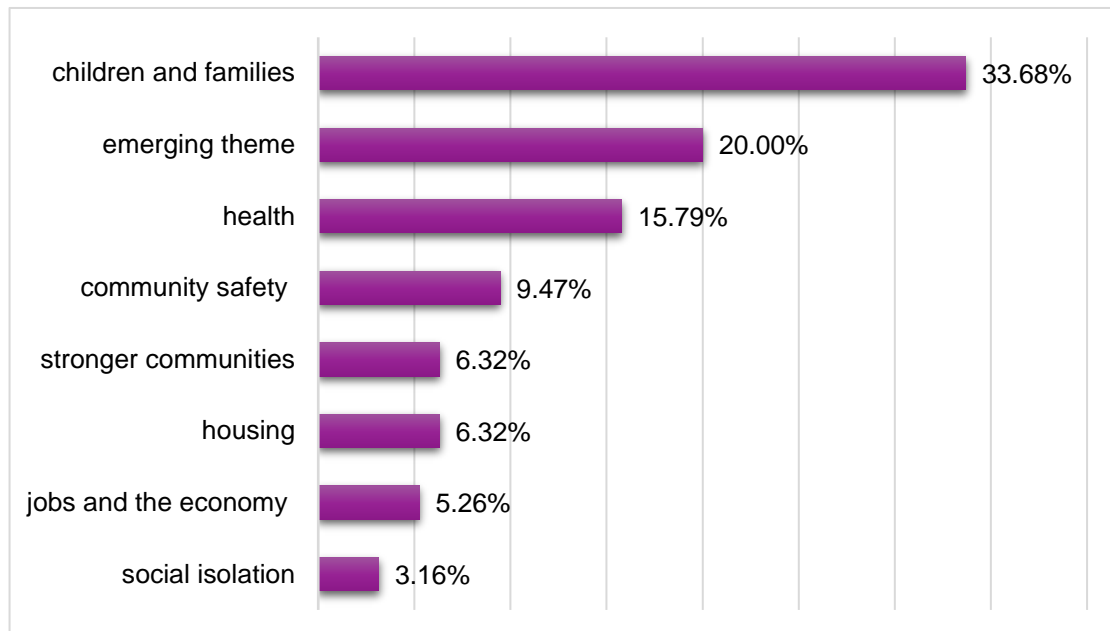
 - **Overall, the three aims that people disagreed with the most (most 'strongly disagree' and 'disagree' responses) were:**
 1. To increase the support offered to people who find themselves in a position where they are accepted as homeless especially those from BME backgrounds and women (Q5) (10.5% 'strongly disagree' and 'disagree')
 2. To increase the rate of employment for disabled people, young people, over 50s and lone parents who are furthest away from the job market (Q4) (9.09% 'strongly disagree' and 'disagree')
 3. To reduce the rate of child poverty, especially in the six most deprived wards (Q6) (6.63% 'strongly disagree' and 'disagree')

 - The aim that received the most 'strongly disagree' responses was:
 - To increase the support offered to people who find themselves in a position where they are accepted as homeless especially those from BME backgrounds and women (6.09% 'strongly disagree')

 - **Overall, responses were significantly more positive than negative. Even the aims that received the lowest proportion of 'strongly agree' and 'agree' responses were still agreed with by a large proportion of respondents**
-

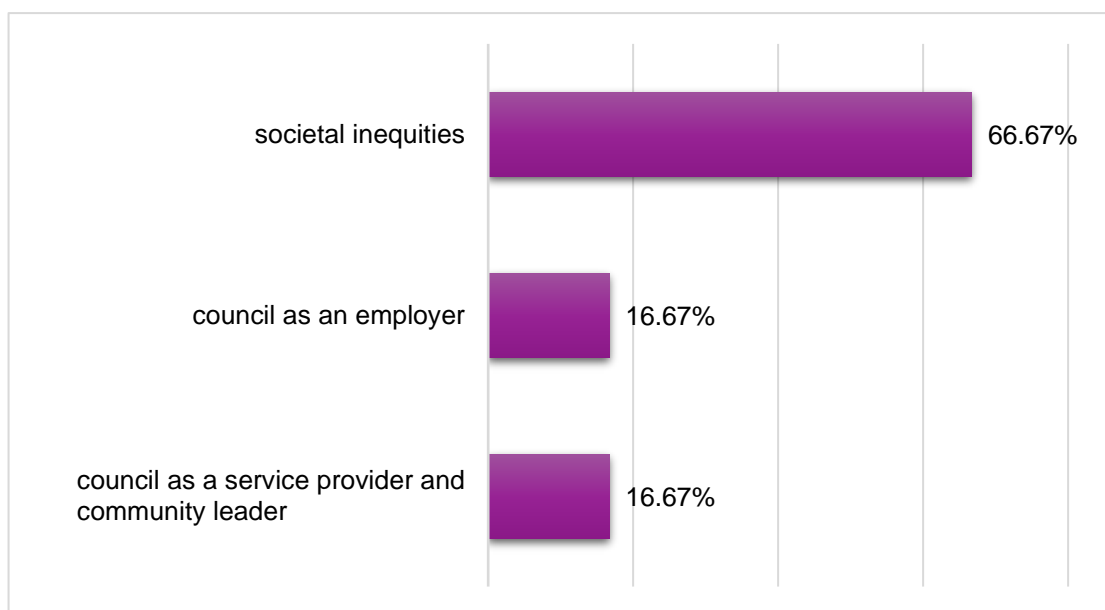
Survey question 14: *Having considered the current equality aims, which issue is most important to you and why?*

[176 respondents]



- Overall, the theme within the current aims that respondents found most important was 'children and families' (33.68%). This is reflected in the previous section, where both of the current aims within the 'children and families' theme were in the top 3 most agreed with aims.
- Although this question specifically asks about the current aims, there was still a high proportion of responses which didn't fit inside of the current themes and were classed as emerging themes. (These will be broken down below)
- 15.79% of respondents focussed on 'health' as the most important issue. These responses included:
 - *Autism: 20%*
 - *Disabilities: 53.33%*
 - *Health inequalities: 26.67%*

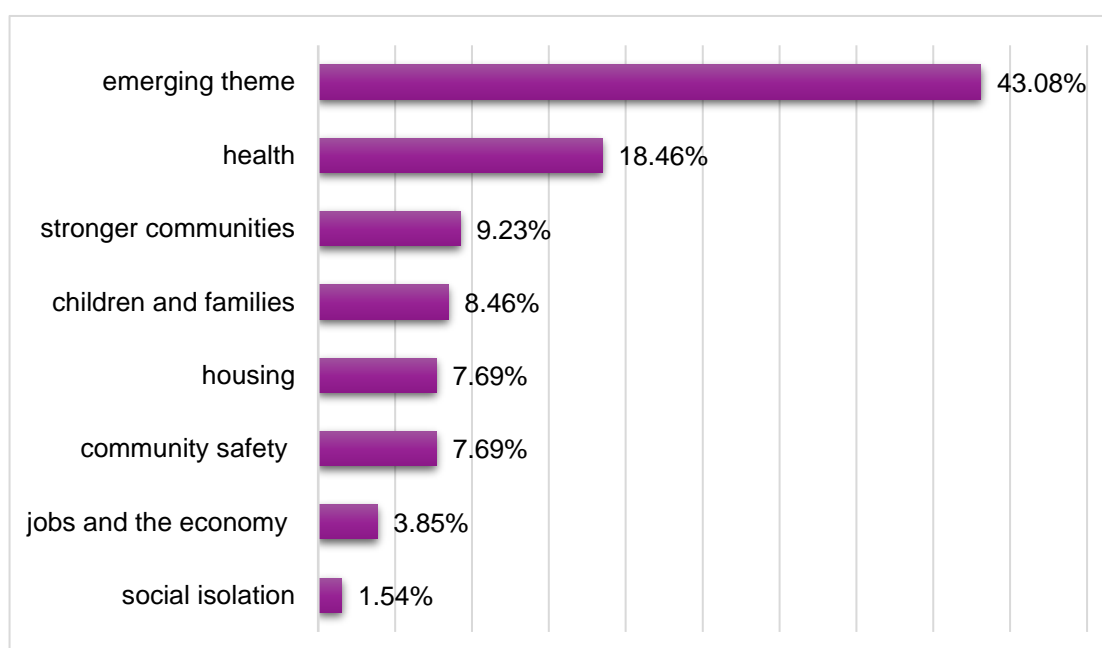
Breakdown of emerging themes



- Amongst the 20% of respondents who gave an answer classed as an emerging theme, the majority (66.67%) were focussed on societal inequities. These responses touched on a variety of areas including:
 - Treating people fairly, specifically including LGBT and religious communities
 - BAME people being discriminated against nationally and in the borough

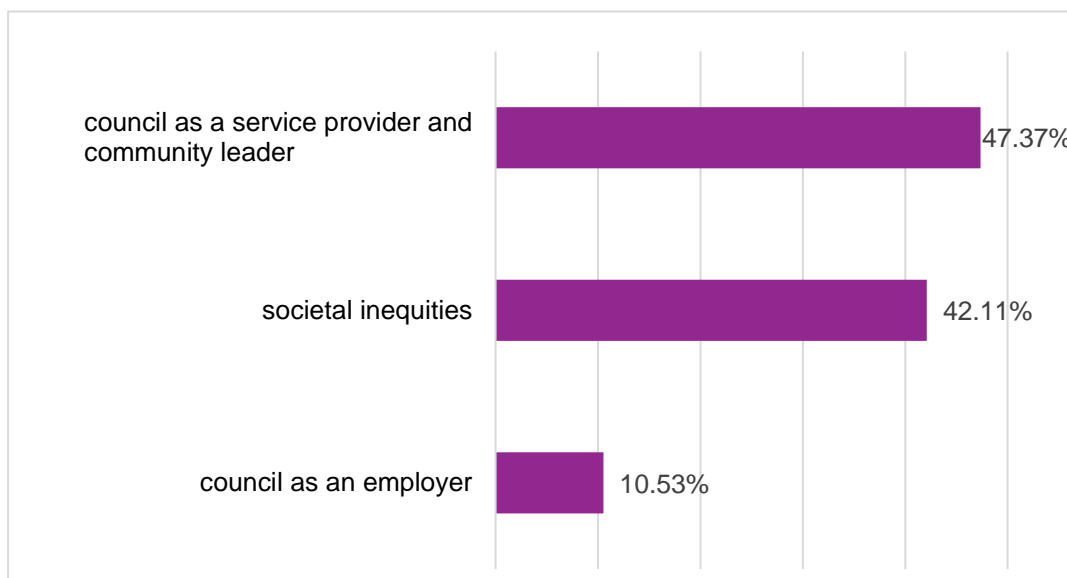
Survey question 15: Do you think there is anything missing from the current aims?

[176 respondents]



- Nearly half of all responses (43.08%) for question 15 focussed on emerging themes. This was expected, as the question asked respondents to think of issues outside of the current aims.
- Similar to question 14, health was also a common theme amongst responses (18.46%). This is perhaps reflected by the fact that there is only one current aim which is based around health (*'to reduce differences in life expectancy between communities'*).

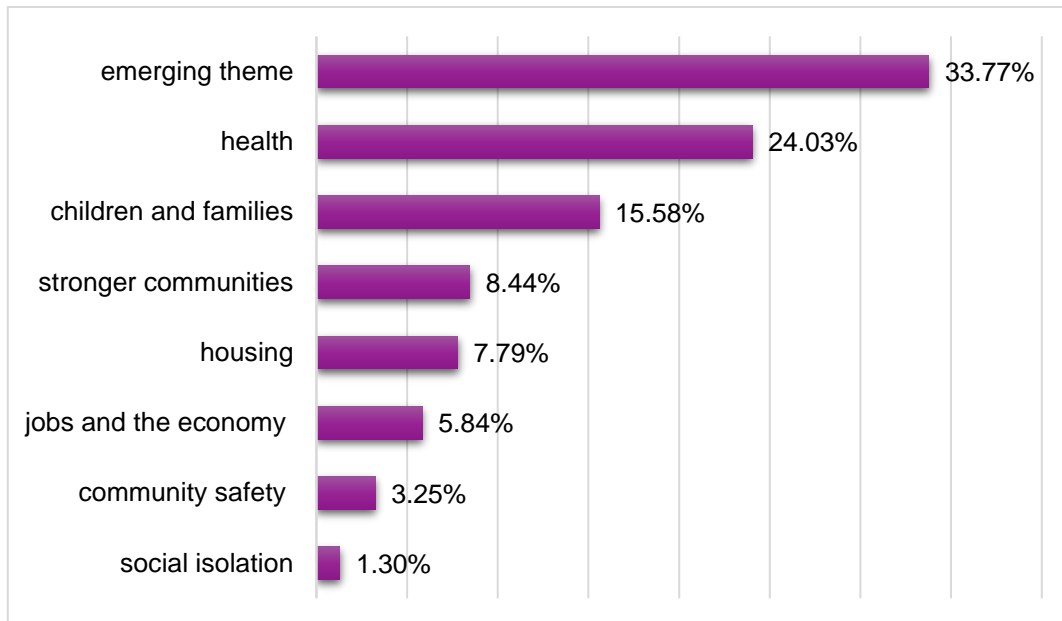
Breakdown of emerging themes



- Amongst the 43.08% of 'emerging theme' responses, the majority of them focussed on the council's role as a service provider and community leader, as well as national and local societal inequities
- This reflects the fact that the current aims focus on priorities that the council can have an effect over, but there is not an aim that reflects the council's role in and of itself.

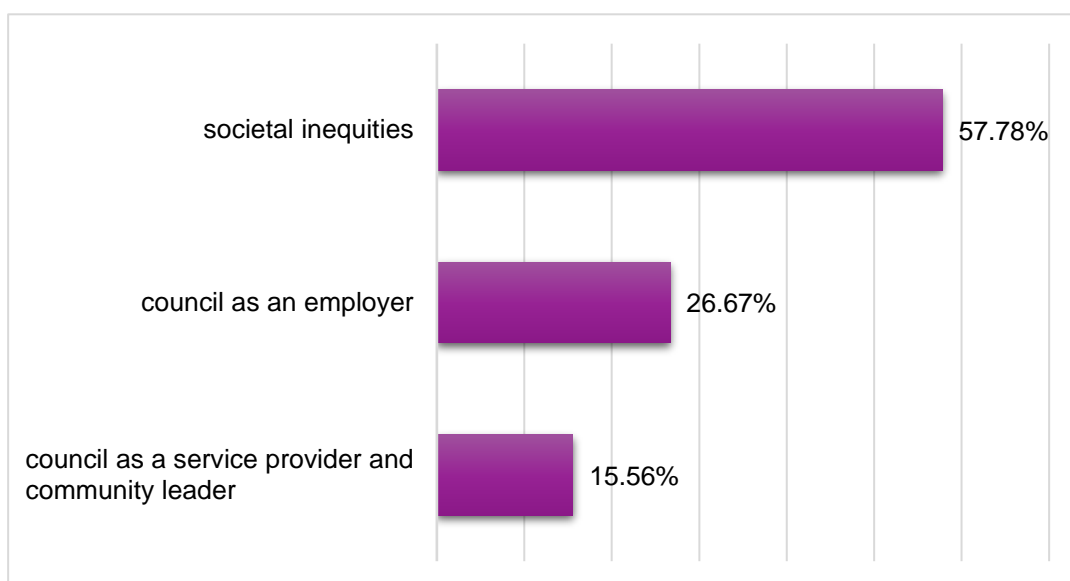
Survey question 16: Please list one key area you think the Council and its partners should focus on in its upcoming Equality Strategy

[174 respondents]



- Just as question 14, the highest proportion of responses were emerging themes (33.77%)
- Similarly, health was also a popular response (24.03%), followed by children and families (15.58%)

Breakdown of emerging themes



- Overall, respondents felt that the council should focus on societal inequities in its Equalities strategy (57.8%)
 - Considering that 'emerging themes' were the most popular responses, a high proportion of respondents overall thought that the council should focus on the 'council as an employer' (26.67%) and as a service provider and community leader (15.56%)
-

Workshop findings

A total of 20 workshops were held throughout the consultation phase with internal and external stakeholders. Workshops involved using Microsoft Teams and the online tool 'Retrium'. Anyone who was not able to participate using Retrium was given the option of a 1:1 call. Those who attended the workshops were consulted on the same questions present in the survey, in order to provide consistency across the consultation. The responses from workshop attendees were recorded as 'actions' and were analysed using the same categories and methods applied to the survey analysis.

Who did we engage?

Some of the external groups engaged were:

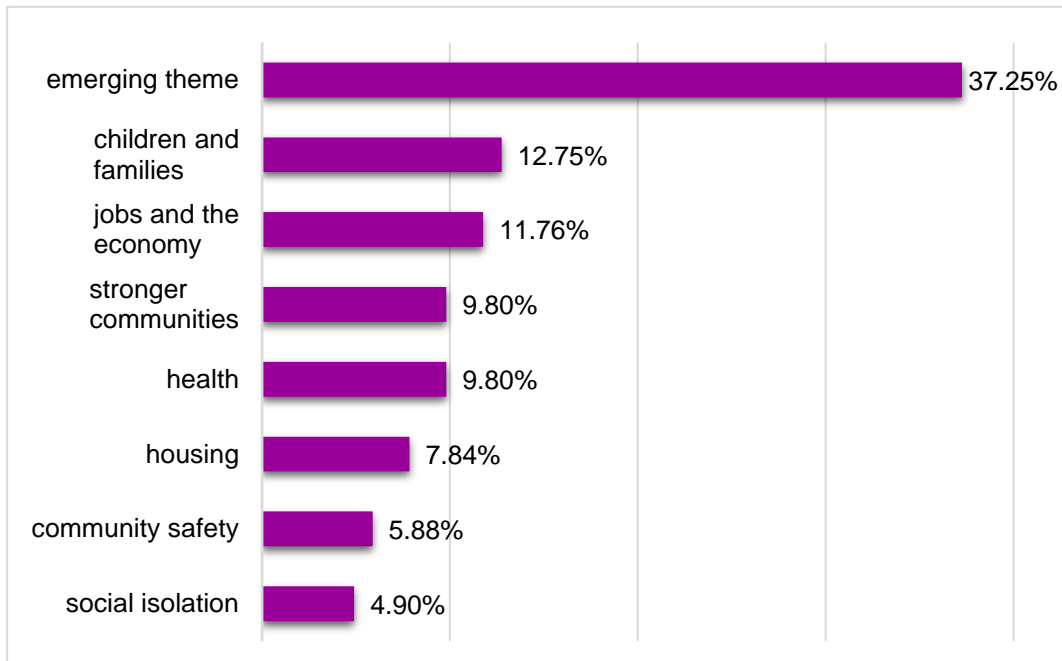
1. BME Forum
2. Asian Resource Centre Croydon
3. Croydon Voluntary Action
4. Faiths Together
5. Croydon Drop in
6. Legacy Zone reps
7. Empire

Overall, there were 203 people consulted representing 65 organisations covering all protected groups (except maternity/pregnant women)

Internal groups engaged were:

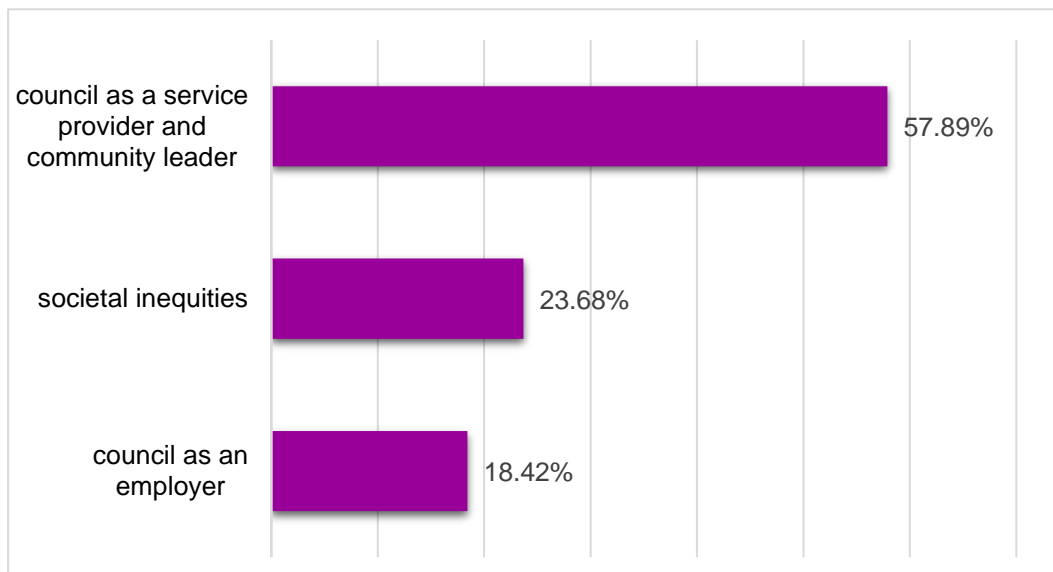
1. BAME network
2. Disability Network
3. LGBTQ+ Network
4. Women's Network
5. Youth Parliament

What did they tell us?



- Overall, the most popular actions recorded in the workshops were emerging themes (37.25%) followed by children and families (12.75%) and jobs and the economy (11.76%)
- Feedback in workshops produced similar responses to those analysed in the survey.
- There were actions that covered each of the current aims, as well as each of the three emerging themes.

Breakdown of emerging themes



- The majority of actions that were emerging themes focussed on ‘council as a service provider and community leader’ (57.89%), followed by ‘societal inequities’ (23.68%) and ‘council as an employer’ (18.42%)
- This feedback differs to the final question of the survey where people were asked what they would like to see council focus on, with societal inequities the top response (57.68%)

Examples of workshop actions by category

Jobs and the economy	<ul style="list-style-type: none"> • Greater partnership with local business to improve employment – for young people and those with protected characteristics • Creating employment, training and education opportunities for groups hit the hardest, prevention strategies to make them less vulnerable
Housing	<ul style="list-style-type: none"> • Preventative strategy - tackle and address issues that lead to individuals becoming homeless such as mental health • Providing quality housing to individuals at their time of need.
Children and families	<ul style="list-style-type: none"> • Ensure that young people are taught life skills such as: money management, mental health, budgeting, how taxes work, healthy cooking, conflict resolution. • Ensuring traditionally middle class jobs appeal to more young people and to support them into it via work placements, internships, apprenticeships
Community safety	<ul style="list-style-type: none"> • Helping to make sure young people feel safe in their neighbourhoods • Holistic approach to tackling domestic violence
Social isolation	<ul style="list-style-type: none"> • Digital inclusion for older people and those with disabilities • Variety of channels for older people to engage and get involved in wider community
Stronger communities	<ul style="list-style-type: none"> • Public spaces available in areas in the Borough that are highly congested - creative solutions, working with artists, schools and wider community • Free or discounted community space to enable community groups to come together
Health	<ul style="list-style-type: none"> • Mental health - examine issues that impact on mental health e.g. environment - get community involved in improving green spaces • To increase support for those less physically able to access certain areas of the community
Council as a service provider and	<ul style="list-style-type: none"> • Ensure protected characteristics are represented during decision-making. For example as part of Culture Board

community leader	<ul style="list-style-type: none"> To increase awareness amongst staff regarding dealings and communications with residents tailored to their needs. - Improving accessibility to services and not limited to online services
Societal inequities	<ul style="list-style-type: none"> Challenging institutional racism in wider society and raising positive profile of younger people especially BAME Over-policing of young people – Helping to facilitate better relationships between the police and young people
Council as an employer	<ul style="list-style-type: none"> Career progression - equality of opportunities particularly for BAME and staff with disabilities across all levels Ensure there is a more diverse range of managers with decision making responsibility

Draft outcomes and priorities

Following engagement, we drafted the following outcomes and objectives to form the basis of the plan:

Outcome 1: The Council addresses social inequities as a community leader and an employer

Objectives

1. Ensure that we create a diverse workforce that reflects our communities at all levels and allows us to make representative decisions making
2. Become a visible and active community leader and ambassador for equality and addressing social inequities
3. Commission suppliers that help us to address inequity and monitor their impact through our contract management framework

Outcome 2: We work with our residents to better understand our communities

Objectives

1. Increase our network across untapped communities, specifically harder to reach groups and their community leaders such as LGBT, refugee and asylum seekers, women
2. Information about the council's work towards tackling inequality is easy to access and understand
3. Key information about local communities (inc all protected groups) is collected, analysed, used and shared with key partners to inform decisions and improve services

Outcome 3: Everyone gets the support they need when they need it

Objectives

1. Recognise the needs of individual groups and provide support to the most disadvantaged groups in the borough
2. More residents are given support to enter education, gain skills and access quality and secure employment and in particular BAME, women, young people, lone parents, and people with disabilities
3. Services are proactive in targeting groups that have accessibility issues as a result of disability, age, mental health, language and/ or physical barriers

Outcome 4: People in Croydon are supported to be in good health

Objectives

1. Create safe, multicultural spaces and celebratory events that are open to all protected groups to help tackle social isolation and bring communities together
2. Develop structures, systems and services that proactively target areas of Croydon where inequalities are at their worst in order to tackle the social determinants of health
3. Work in partnership to ensure health services are accessible to everyone, and residents know where and how to access services

Outcome 5: Lifelong learning around equality and inclusion is championed

Objectives

1. Our partners feel supported to reduce inequalities and discrimination that lead to disproportionality in school exclusions and young people entering the criminal justice system specifically for groups such as black males, Gypsy roma and travellers and those on free school meals
2. Use existing mechanisms such as Good Employer Charter to develop best practice for Croydon employers, including the council, to ensure equality training is provided and regularly reviewed
3. Offer support to the groups such as White British adults, pupils from Black backgrounds, children on free school meals who need it most to enable better education outcomes

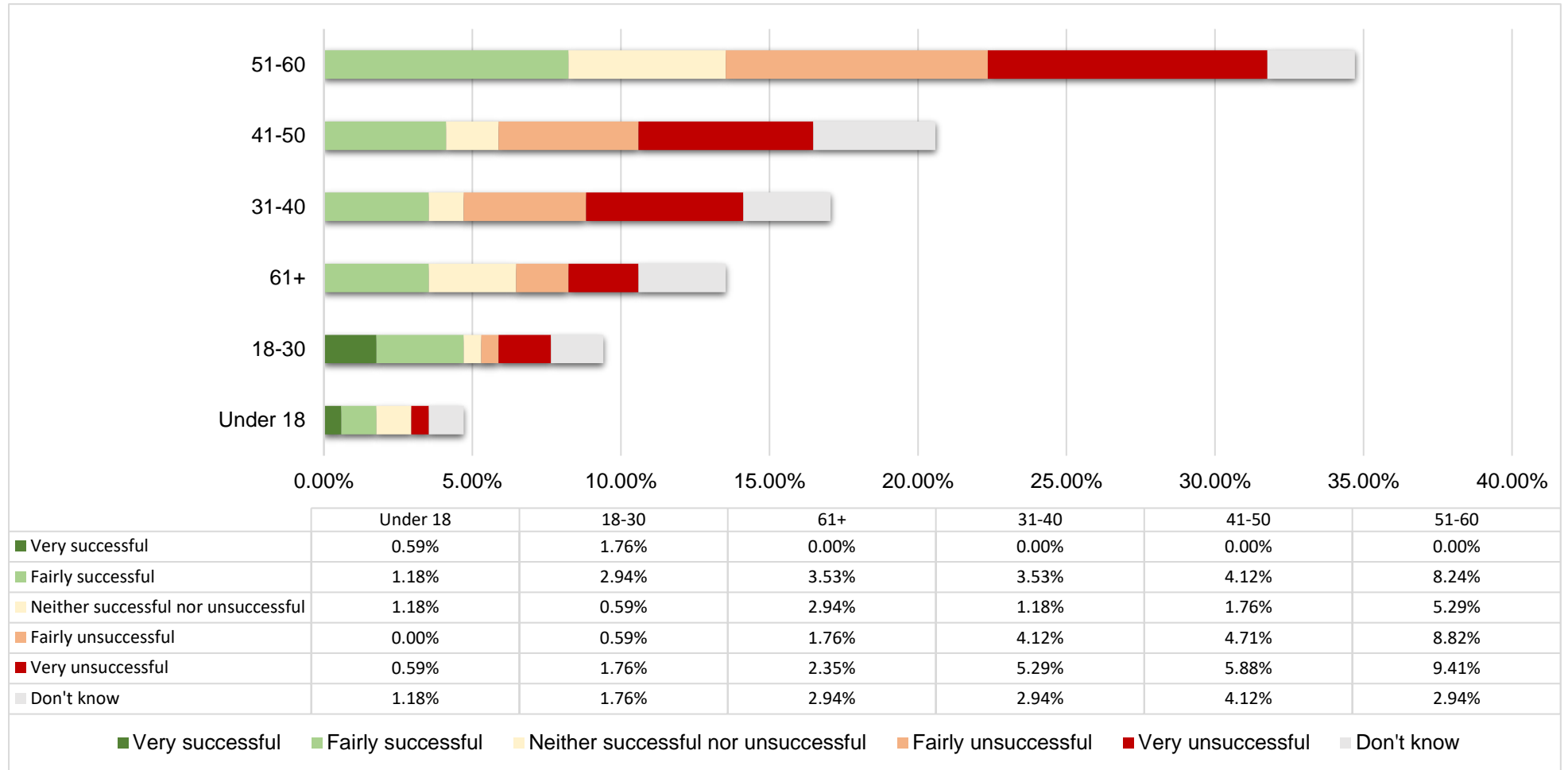
Information to note

- Although it appears as if social isolation was not a primary concern amongst respondents, it is important to note that responses were categorised based on what was considered the main concern/point within the response. For example, there some responses that specifically mentioned accessibility of services for disabled people and how this could help prevent social isolation amongst disabled people. These responses were categorised as 'health' but the social isolation aspect of these responses helped to shape, formulate and inform the strategy outcomes, priorities and actions.
-

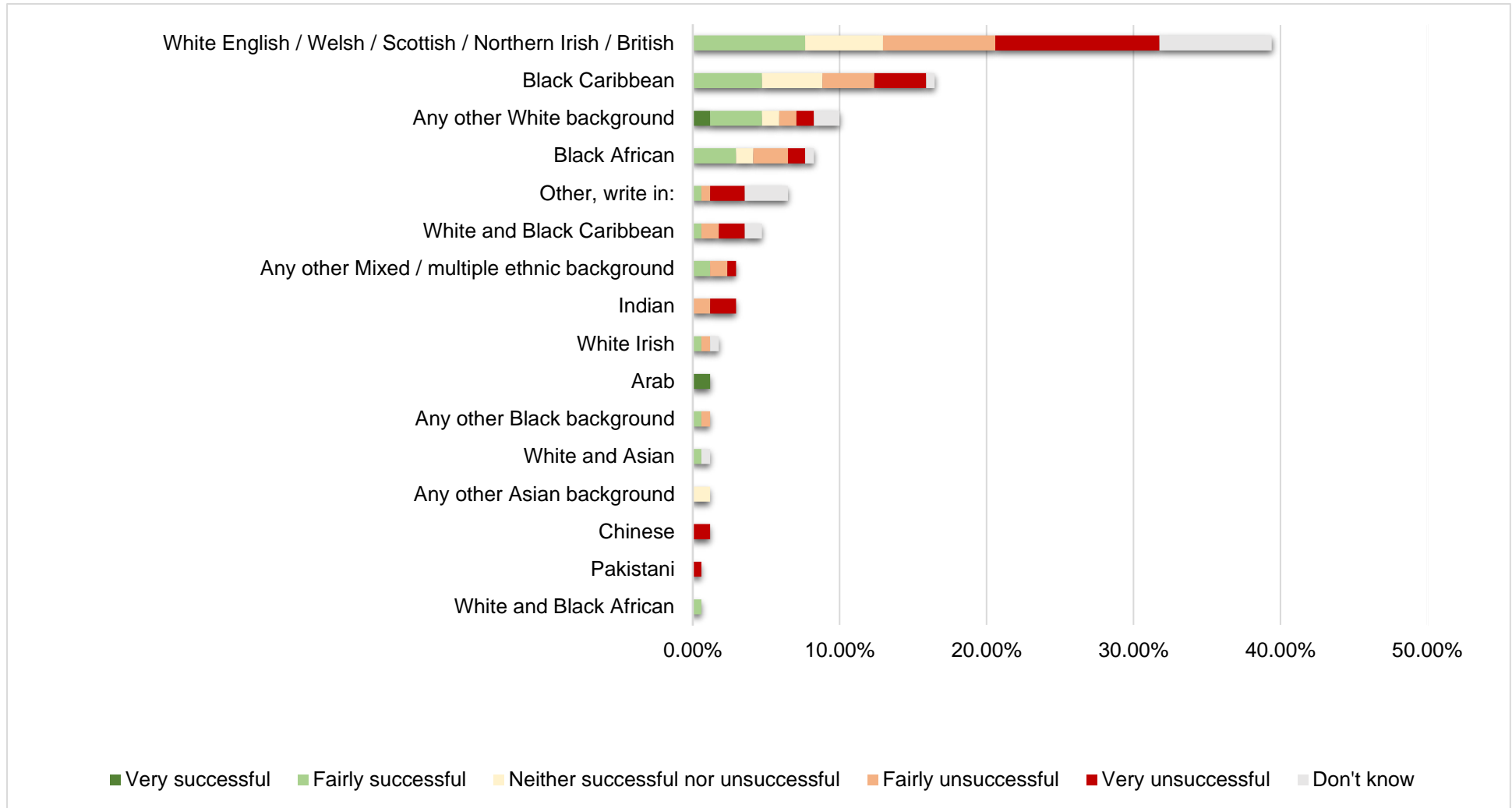
Appendix 1

Question 1 cross tab analysis

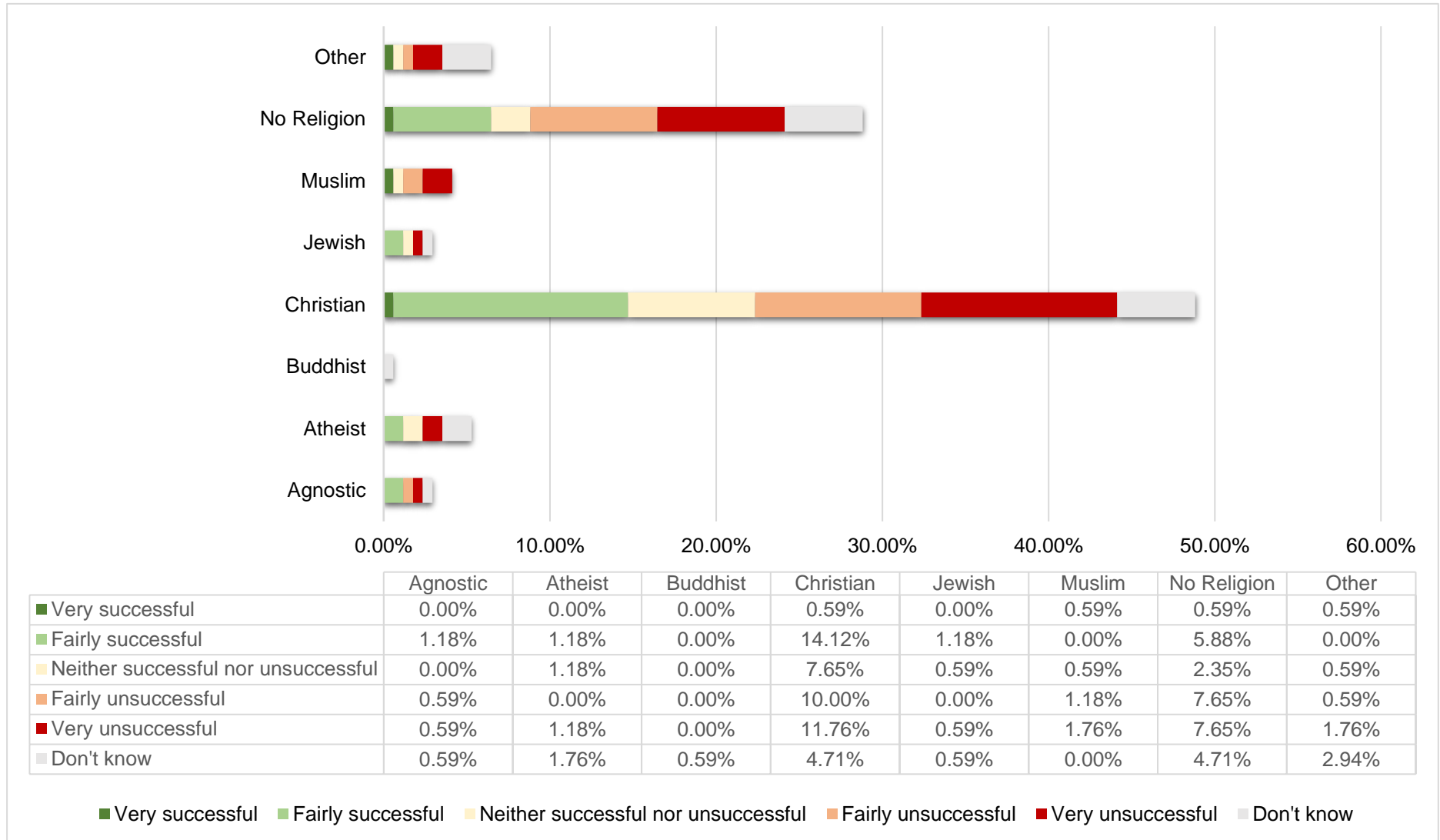
Age



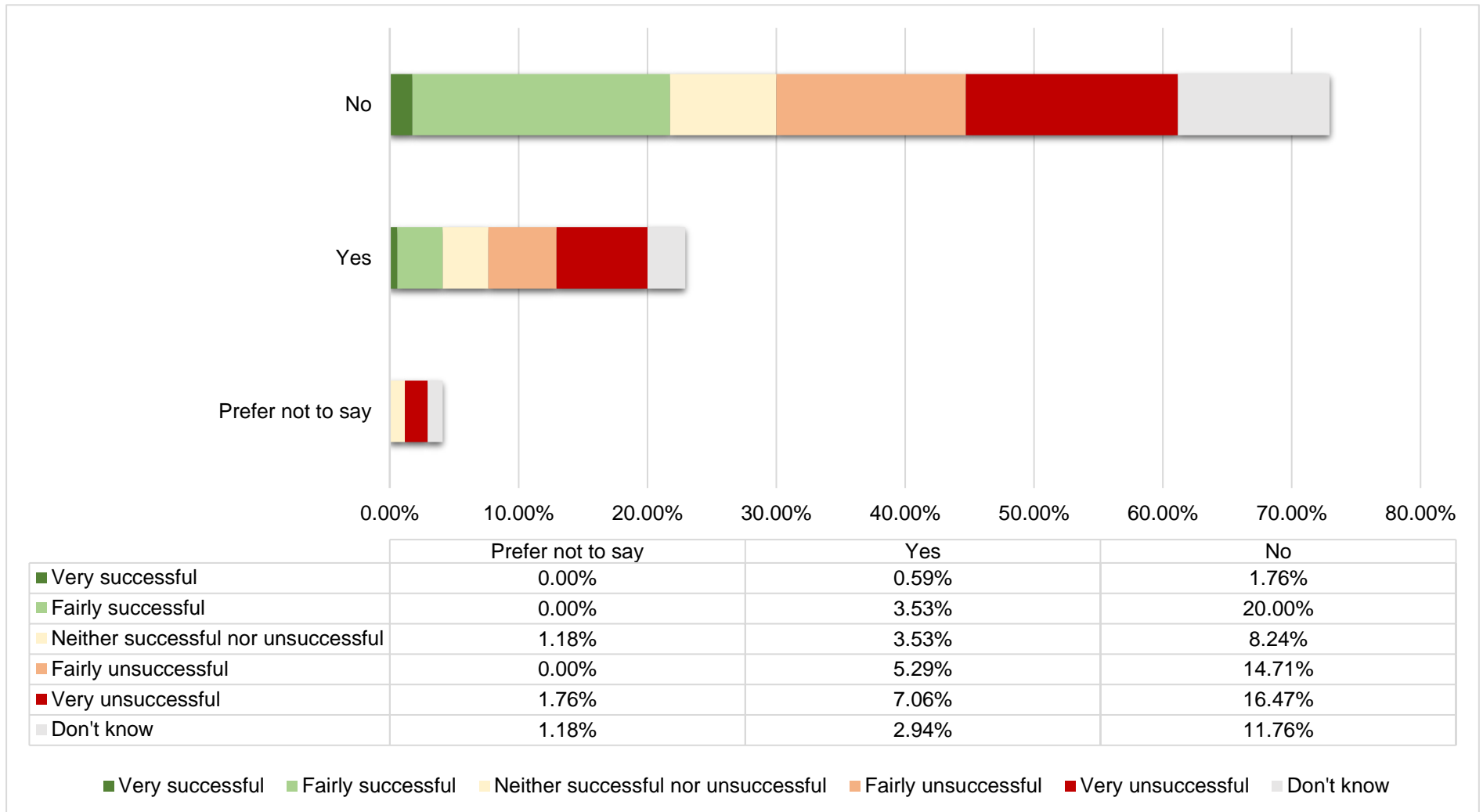
Ethnicity



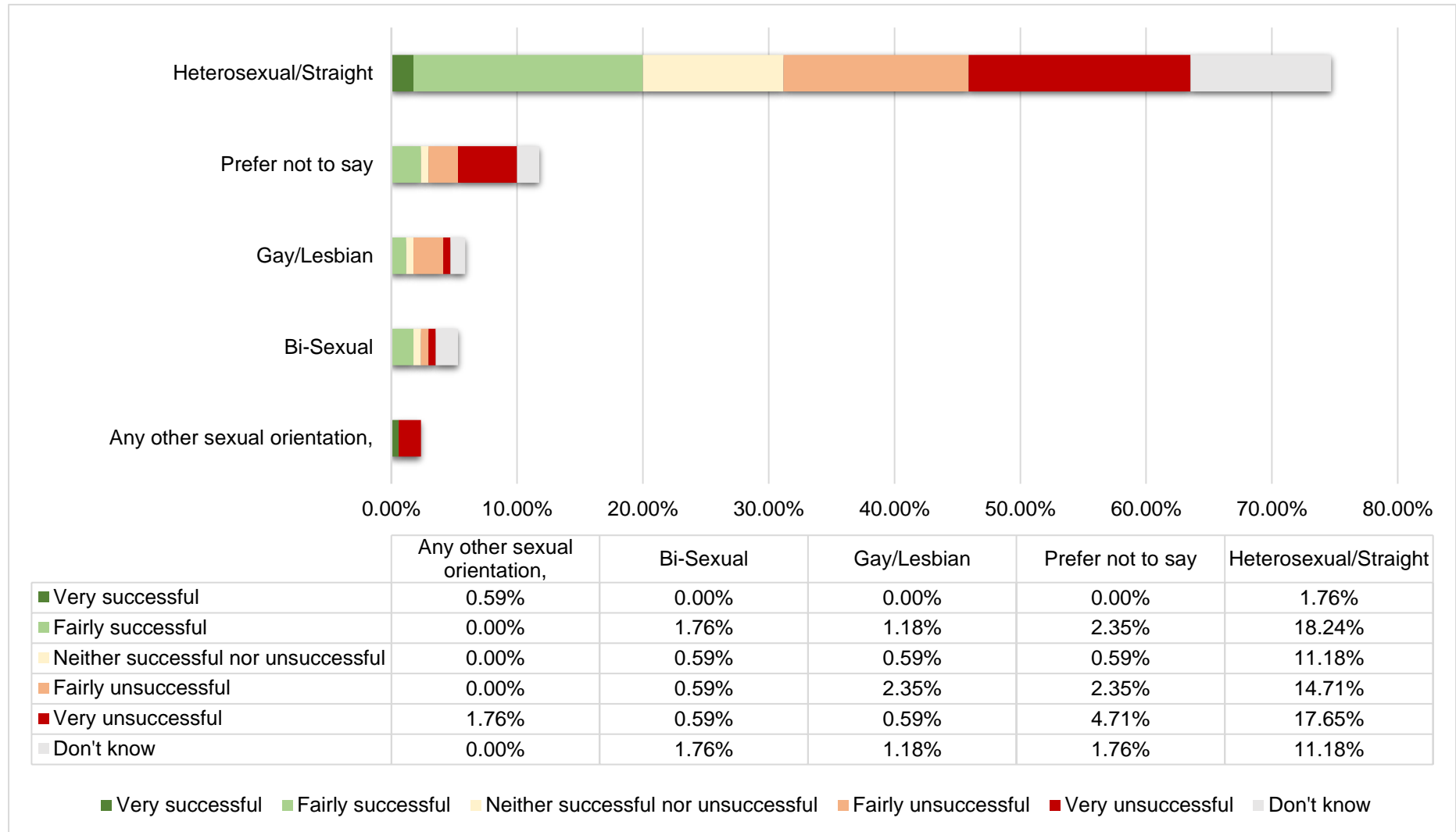
Religion



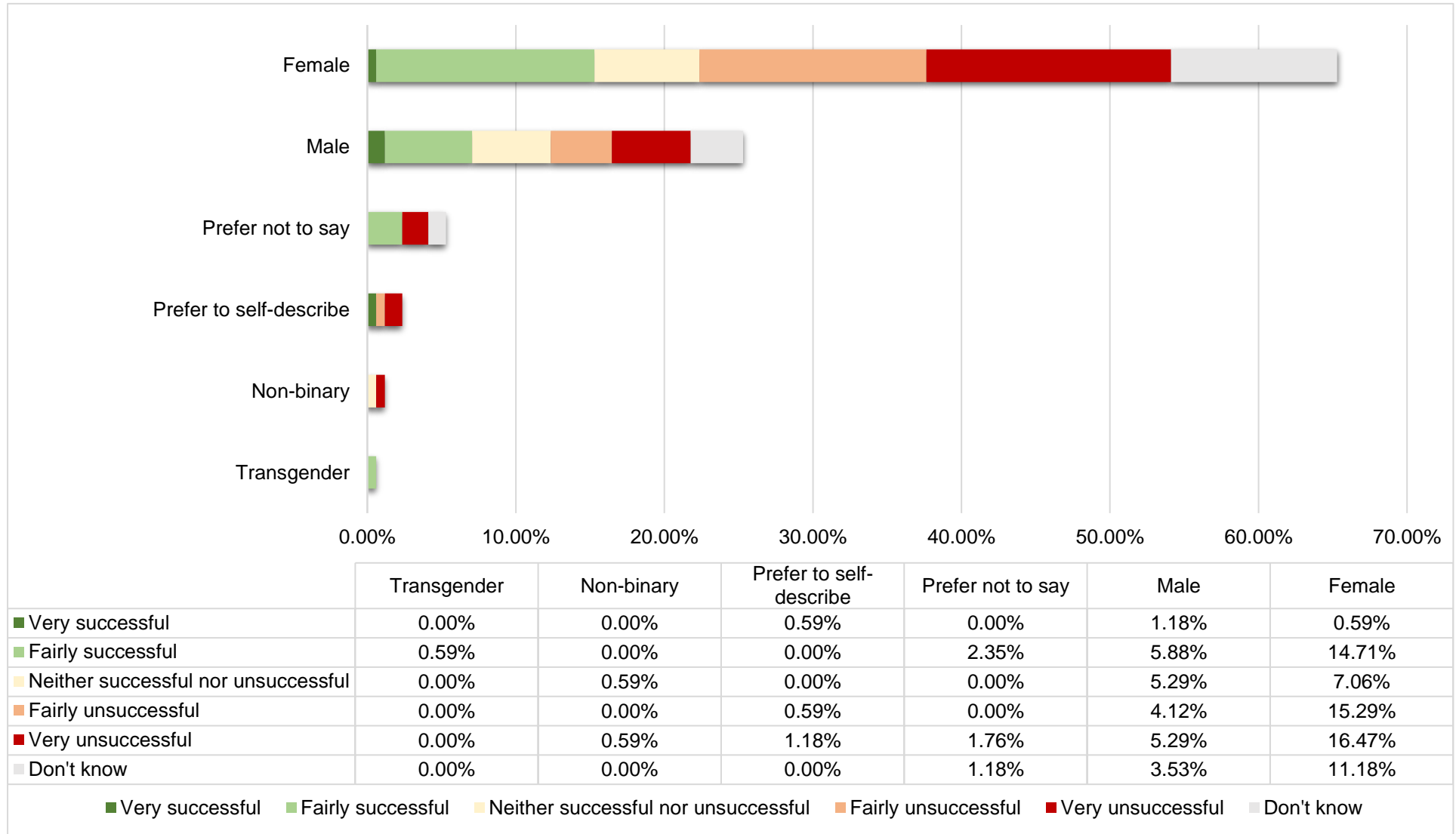
Disability



Sexual Orientation



Gender



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Data Protection Impact Assessment (DPIA)

Project Name:	Equality Strategy
Project Manager or Sponsor (PM):	Yvonne Okiyo
Name of person completing the DPIA if different to (PM):	
Service Team and Department:	Policy and Partnerships, Resources Department
Relevant Director and Executive Director:	Gavin Handford, Jacqueline Harris-Baker
Information Management Champion(s) for service area:	
Date DPIA received by the IMT:	02.06.20
Date approved by DPO:	07.07.20
Date approved by IMT :	07.07.20

1 Project Scope

Include the projects aims, potential impact, all individuals involved in the project and those that may be affected by it. The stakeholders should be as broad as possible so that the list can be edited down after consultation)

Under the Equality Act 2010 (Specific Duties) Regulations 2011, councils employing more than 150 people will have to produce "equality objectives" at least once every four years. Our current equality objectives come to an end this year.

The Council is undertaking a process of developing an Equality Strategy and accompanying action plan for 2020-2024. The Strategy will set out the Councils vision to abolish inequality in Croydon and work towards a place where all have an equal opportunity to prosper as set out in its Corporate Plan 2018 - 2022.

Part of this process will also consist of developing refreshed equality objectives which will help the Council meet its requirements under the Equality Act 2010.

Part of this process will also consist of examining the health, socio-economic and new dimensions of inequalities amplified by the Coronavirus pandemic. This will looking at how different groups in the Borough have been affected by this period and work towards reducing these inequalities.

As part of this process, we would like to engage and consult with residents and local communities across the Borough to find out their views on our current equality objectives and use their feedback to develop the refreshed equality objectives that will form the basis of the strategy. We will want to make this process as inclusive as possible and as such will be consulting with a wide range of stakeholders and ensure they are representative of all communities. *A list of stakeholders has been sent separately.*

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2 Data Description

Answer the questions below so that there is a clear understanding about how the information will be used, who will use it etc. Remember that it's personal information (i.e. information about individuals) that you need to be concerned with. If you do not have answers to all the questions at this time, simply record what you do know.

<p>Whose information is being used?</p> <ul style="list-style-type: none"> - Are there additional concerns that need to be considered due to individuals sensitive/ complex circumstances? i.e. vulnerable person 	<p>The information that is being collected is through an online consultation and online focus groups. The consultation is open to all members of the public and we aim to ensure it is representative across groups that share a protected characteristic. The information that has been requested will not lead to the personal identification of any one person. However, the broad questions that have been asked, and the broad number of people that have been targeted for responses does mean that there is a strong possibility that a person(s) could identify themselves in an open text box should they wish to do so.</p>
<p>What information is being used?</p> <ul style="list-style-type: none"> - Consider the nature of this information E.g. Child's social care file 	<p>The questions that have been asked are centred around the current equality proposed outcomes and priorities for children and young people in Croydon. Therefore responses received should detail how important or unimportant people feel those priorities/ outcomes are.</p> <p>We have also requested information in relation to a participant's protected characteristics, in order to respond to the council's commitment to monitor equalities data. The nature of this information does not lead to the identification of any individual person, provided that respondents to not use the "other" text boxes to identify themselves.</p>
<p>Does it include special category or criminal offence data?</p>	<p>No</p>
<p>Can an individual be identified easily from the information?</p>	<p>No</p>

<p>What is the potential impact on privacy of this information?</p> <ul style="list-style-type: none"> - <i>What are the risks/ impact to an individual if this information was lost, stolen or manipulated?</i> - <i>E.g. could it be sold?</i> 	<p>Providing that individuals do not choose to, for any reason, add personal information into the free text boxes, there would be no potential risk or impact on privacy should this data be lost, stolen or manipulated. It provides no personal information to be used in anyway.</p> <p>However, should an individual respondent choose to share their information in the consultation, there would be a risk that that person could be identified or contacted should something untoward happen to the raw data set.</p>
<p>Will this change the manner in which we handle, use or protect this information? <i>e.g. should it be encrypted?</i></p>	<p>In order to mitigate this risk that an individual shares their personal information in free text boxes, the raw data set that is gathered through the get involved website, will only be handled by the two members of the team who are responsible for analysing the raw data set after it is initially exported. The data set will then be cleansed of any potentially personal information, and saved as a workable data set. The raw data set will then be deleted, and only the workable data set will be used.</p> <p>High level findings of the consultation will be shared with internal agencies and partners where appropriate and relevant to the development of the equality strategy, no personal information will be shared as part of this, and the full data set will be held by the Policy Team. The data will be deleted after two years.</p>

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3 Consultation process

Consider how to consult with relevant stakeholders.

When did you consult individuals?	Engagement to take place June 2020
How did you consult individuals?	Consultation to take place via online focus groups - retro workshops via Retrium as well as online survey using the 'Get Involved' platform
If not explain why it is not appropriate.	
Who else within the organisation have you consulted with?	We will consult with staff diversity networks, Executive Leadership Team (ELT), Departmental Leadership Team (DLT)
Do you need to speak with your processor to assist?	No
Do you plan to consult information security experts or any other experts?	Yes

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4 Assessment of necessity and proportionality of data usage

What is your lawful basis for processing?	We will not be processing personal data
Is consent being relied upon to share the information? Has explicit consent been obtained? Are data subjects able to opt out from giving consent?	Consent is not required as no personal data is being requested.
Does the processing actually achieve your purpose?	N/A
How will the information be collected? (Verbally, forms, intranet, interview, 3 rd party, anonymous)	Information is being collected via an online server and online focus groups, however as previously mentioned, personal data is not being requested.
Is there another way to achieve the same outcome?	No. We need to ensure that residents and partner organisations have had the opportunity to comment on joint strategic vision and priorities, in addition to ensuring that their feedback is used to develop the refreshed equality objectives that will form the basis of the strategy and they feel that we are working towards the right priorities to reducing inequalities in the Borough.
How will the information be used? <i>e.g. to write a report</i>	To develop the refreshed equality objectives that will form the basis of the Equality Strategy
Do the individuals know and understand how their information will be used? If there are changes to their information does the privacy notice need to be amended?	We will inform individuals how their information will be used as part of the consultation process
How will it be stored, kept up to date and disposed of when no longer required? <i>e.g. stored in locked cabinet/securely shredded</i>	<p>The data will only be gathered once and therefore will not be updated.</p> <p>The raw data set that is gathered through the get involved website, will only be handled by the two members of the team who are responsible for analysing the raw data set after it is initially exported. The data set will then be cleansed of any potentially personal information, and saved as a workable data set. The raw data set will then be deleted, and only the workable data set will be used.</p> <p>High level findings of the consultation will</p>

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	be shared with internal agencies and partners where appropriate and relevant to the development of equality strategy, no personal information will be shared as part of this, and the full data set will be held by the Policy Team. The data will be deleted after two years.
How will you ensure data quality and data minimisation?	N/A
Who will have access to the information within LBC? - <i>Include approximate number of users</i>	3 members of the policy team, 1 member of the communications and engagement team.
Are there new or significant changes to the way we manage, use, handle or collect this information? - <i>Include any identified concerns for the individuals, would these changes heighten risks involved</i>	No
Will individuals within an existing database be subject to new or changed handling? - <i>If yes amendments need to be made to the privacy notice and these individuals need to be informed.</i>	No
What are the internal arrangements for processing this information? <i>e.g. number of staff who will have access</i>	N/A – one time only data set
How will the information be updated? <i>e.g. monthly check</i>	N/A – one time only data set
Does the project involve the exchange of information outside of the UK and are there set standards for how the information will be treated? How will you safeguard international transfers?	No
How will you prevent function creep?	N/A – high level findings only will be shared which will be anonymous.

5 Assessment of the risks to the rights and freedoms of data subjects

You must describe the source of risk and the nature of potential impact upon individuals and identify any additional measures to mitigate those risks.

5a Security

Who will be responsible for the control for this information?	Policy Team
How will the access to this information be controlled?	The raw data set will be deleted after a workable data set is created. Therefore no risk of access to personal data.

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Is the data correctly managed to reduce the risk of collateral intrusion to the data subject?	N/A
Are there adequate provisions in place to protect the information? If so what are they? <i>e.g. Process, security</i>	N/A - as outlined above

5b Sharing

Who is the information shared with, why are we sharing the information with this organisation?	High level findings will be shared only, no personal data.
What purpose does the information we are sharing have to the third party? - <i>Ensure that we only share relevant information and not excessively</i>	Partners will only receive high level findings of the consultation. No personal data will be shared.
Who will have access to the information, externally? - <i>Include approximate number of users</i> - <i>Describe any sharing arrangements and what the level of access is. It may help to produce a diagram to show the data flows.</i>	As above.
How will it be transmitted to third parties and when? How often?	N/A
Is there a data sharing agreement in place?	N/A – as above
At what stage will the information be transferred?	N/A

5c Identified Risks and assessment:

You should take into account the sensitivity of the information and potential harm that inappropriate disclosure or use of the information could cause to any individuals concerned. You should also consider the reputational loss to the Council and the potential for financial penalties being imposed by the ICO.

To assess the level of risk you must consider both the **likelihood** and the **severity** of any impact on individuals. A high risk could result from either a high probability of some harm or a lower possibility of serious harm.

The severity impact level and likelihood should be scored on a scale of 1 to 10 with 1 being low severity and 10 high. The two scores should be **added** together. The RAG status is derived from the following scale:

Score:

- 15 to 20 = Red (High)
- 8 to 14 = Amber (Medium)
- Below 8 = Green (Low)

To be completed by Project Sponsor

Risk Identified	Severity of Impact	Likelihood of harm	Overall RAG rating
To focus on info that is shared before consent – is dob/ anon details of the family/ sw/mgr/lawyer/ reasons for eligibility	1	1	2 – Green= Low
A member(s) of the public may use the free text boxes in the consultation to identify themselves as an individual or provide personal data where it is not requested.	1	1	2 – Green= Low

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6 Identify measures put in place to reduce risk.

You must now identify additional measures you could take to reduce or eliminate any risk identified as medium or high risk in step 5.

To be completed by the Project Sponsor

Risk Identified	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
A member(s) of the public may use the free text boxes in the consultation to identify themselves as an individual or provide personal data where it is not requested.	<ol style="list-style-type: none"> 1. Do not use free text boxes – this is not an option, as it does not allow us to gather the information that we require for an effective consultation. 2. One member of the policy team to review the raw data set and remove any indications of personal data, and save the new set as the workable data to be used for consultation analysis. The raw data set will then be permanently deleted. 	Eliminated	Low	Yes / No

Sign off and Record sheet

Item	Name/date	Notes
Measures approved by: Residual risks approved by:		Integrate actions back into project plan, with date and responsibility for completion. If accepting any residual high risk must consult ICO before going ahead.
DPO advice provided: <i>This project involves the collection of individual's views in order for them to contribute to the drafting of the Council's Equality Strategy. This information will include a person's racial or ethnic origin - Special Category information. The Council understands that it must take extra care with Special Category Information</i> <i>I was pleased to see that the information will be stored securely and raw data set will be deleted and a workable set used. I could also see that the team has given careful consideration as to how the information could be used without identifying particular individuals. This assists the Council to comply with GDPR.</i> The risks of this project are identified in the DPIA at page 8. The actions to mitigate these risks are at page 10. In addition to these, the team should consider the following	Nicola Thoday, Senior Corporate Solicitor, on behalf of Sandra Herbert, Data Protection Officer and Head of Corporate Law and Litigation 7 July 2020	Summary of DPO advice: If the issues identified in the DPO advice and within the DPIA are addressed this will be adequate to protect the data subjects from risks of personal data breach or any harm. I would be happy for the processing to proceed. <i>(DPO should advise on compliance, measures to mitigate risk and whether processing should proceed)</i>

<p>(in no particular order):</p> <p>1 Individuals contact details</p> <p><i>The Council should give further consideration to the individuals contact details (personal data). For example, are they retaining these in order to keep the individuals updated with the Policy's progress? If so;</i></p> <ul style="list-style-type: none"> • <i>the individuals would need to give their freely given consent,</i> • <i>the information should be kept secure,</i> • <i>the list should not used for other purposes and</i> • <i>the information should be deleted when no longer needed.</i> <p>2 Collecting information</p> <p><i>The form for collecting information must only request information needed for the drafting of the Policy (and not excessive information). It must also include a clear description of how the information will be handled (an appropriate Privacy Notice) and give their consent for their information to be used by the Council. I am happy to help with this drafting if you wish.</i></p> <p>3 Processors</p> <p><i>The DPIA mentions that the information will be collected via an external website. There should be the appropriate</i></p>		
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<i>contract clauses in place to ensure the website handles information properly (such as information security and deleting information).</i>		
Consultation responses reviewed by:		If your decision departs from individuals views you must explain your reasons.
DPIA to be keep under review by:		

If you require further guidance to complete this DPIA please contact:

Information Management Team (IMT)

Ext: 47777

Email: information.management@croydon.gov.uk

Data Protection Officer

Email: DPO@croydon.gov.uk

Equality Analysis Form

1. Introduction

1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

2. Proposed change

Directorate	Policy and Partnerships
Title of proposed change	Equality Strategy 2020-2024
Name of Officer carrying out Equality Analysis	Yvonne Okiyo

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Briefly summarise the proposed change and why it is being considered/anticipated outcomes. What is meant to achieve and how is it seeking to achieve this? Please also state if it is an amendment to an existing arrangement or a new proposal.

The proposed draft Equality Strategy 2020-24 sets out the Council's commitment to tackling and addressing inequality in Croydon, through a set of draft equality objectives and measures, over the next four years in accordance with the Equality Act public sector duty.

Equity and inclusion is integral to achieving our ambitions for Croydon – it is the very foundation upon which we ensure residents are treated fairly and equitably by the Council, its partners and service providers, giving individuals the opportunity to be who they are and achieve the successes they aspire to. This is particularly important for those who are most disadvantaged, so they too, can reach their full potential.

We aim to value diversity and promote equity and inclusion through our service provision, and as an employer. The purpose of the Council's Equality Strategy is to provide a detailed insight into our ongoing commitment to equality, set out in one place our equality objectives and other arrangements for embedding equality into everything we do and, perhaps most importantly, set out where we must improve. We have developed this strategy in partnership with Croydon's residents, businesses, Voluntary and Community Sector (VCS) and staff – with a view to delivering a combined strategic vision for equality across the borough.

Croydon Council is the second largest of all the London boroughs in terms of population, with approximately 386,700 residents (ONS 2019).

Age and gender

Nearly a quarter of this figure (24.5%) is made up of young people aged 17 years or under. Croydon has the 4th largest proportion of young people in London which has implications on the types of services required to cater for the youth in Croydon.

There is a higher proportion of males compared to females in the 0-19 years age band; there is not a lot of difference between the proportions of males to females in the 20-39 years and 40-64 years age bands. In the above 65 years age band, there is a higher proportion of women to men.

Ethnicity

Just like other London boroughs, Croydon has a higher proportion of residents from the BAME communities compared to the national average. There was more diversity in the younger age group population in Croydon in 2011.

The proportion of Asian and Black residents in Croydon has been increasing since the 2011 Census. The proportion of White population is predicted to decrease by almost 10% by 2021.

Religion

Just over half (56.4%) of respondents to the 2011 Census in Croydon stated that they were Christian. About 1 in 5 (20.0%) stated that they had no religion. Significantly 7.6% of respondents did not state their religion.

Sexual Orientation

Sexual orientation was not captured by the 2011 Census. Based on ONS estimates, across London it was estimated that 2.6% of the population in 2014 identified themselves as gay, lesbian or bisexual. This was higher than the national average of 1.6%. By applying the London average to the Croydon population it was estimated that there were about 9,800 people in Croydon who would have identified as being gay, lesbian or bisexual.

Marital Status

The 2011 Census is the latest data source for marital status. The majority of adults aged over 16 in Croydon were either married or single in 2011.

Gender Identity

The Gender Identity and Research Society has estimated that nationally 1% of the population may be gender variant to some degree, with 0.2% of the population likely to seek medical treatment, at some stage, to present in the opposite gender.

Disability

There is not one comprehensive figure that can give a true picture of the total number of people with a disability in Croydon. The 2011 Census figures showed that 14.1% of the population in Croydon had their day-to-day activities limited to some extent by a long-term health problem or disability. 22,493 people had their day-to-day activities limited a lot, whilst 28,134 had their day-to-day activities limited a little

Our Residents

Carers

The Census 2011 recorded 9.3% of the Croydon population as providing some form of unpaid care. This was slightly higher than the regional average of 8.5%. Of the 33,683 carers in Croydon, 65.5% provided up to 19 hours of unpaid care a week. However, 20.3%, equating to 6,870 people, provided 50 or more hours of unpaid care a week.

Proficiency in English

At the time of the 2011 census 14.5% of people in Croydon had a language other than English recorded as their main language. The majority could speak English well but around 1 in 6 of this group (17.2%) amounting to 2.5% of the total Croydon population at the time could not speak English well or at all.

Only 5.4% of 8 to 9 year olds were unable to speak English or could not speak English well. These children made up only 0.4% of all the 8 to 9 year olds in Croydon. Over half (51.5%) of those aged over 85 years could not speak English well or were unable to speak English. This older cohort made up 2.9% of all 85+ year olds in Croydon. A higher proportion of females (19.7%) compared to males (14.5%) could not speak English or speak English well.

Deprivation

Croydon has become relatively less deprived compared to other local authorities in England between IMD 2015 and IMD 2019

There remains geographic inequality in the distribution of deprivation in the borough with the North and East of the borough remaining more deprived

Wealth Inequality

There remains geographic inequality in the distribution of wealth in the borough with the North and East of the borough remaining more deprived. Croydon contains some of the poorest neighbourhoods in the country.

Education and Skills

- Attainment at Key Stage 2 is improving in Croydon but there is still more to do in this area.
- Take up of funded hours in early years settings is still below national and regional levels
- Whilst, in recent years, Croydon's GLD has been above the national, it has remained stubbornly lower in all aspects of language development, particularly in the aspect of 'speaking'.
- The proportion of children achieving grades AAB or above at Key Stage 5 is much lower than the national and regional averages
- Since 2015 at local, regional and national levels there has been a lower proportion of children from Black backgrounds achieving Attainment 8 scores
- Like with England as a whole Black Caribbean pupils in Croydon have the greatest level of disproportionately when it comes to exclusion from school.

Economy

- The job density rate measures the ratio of total jobs population aged 16-64 years. The Croydon rate is lower than national and regional levels.
- The proportion of out of work claimants has risen by around 5% since March 2020 – directly as a result of the impact of the Covid19 pandemic on the economy.
- There has been a huge increase in unemployment for 18-24 year olds and 50-64 year olds since April 2020.
- Croydon rate of out of work claimants has increased.

Housing

- Croydon had 1,657 net additional dwellings in 2019/2020. This is a 42% reduction on the 2016/2017 figure.
- For 2019/2020, 7 in 10 homeless households in Croydon were made up of residents from the non-White communities.
- Social housing in Croydon is mainly concentrated in the northern parts and the eastern edge of the borough.
- Over the years, by far the highest proportion of accepted homeless households in Croydon have been made up of lone parents with dependent children
- Latest figures for 2019/2020 show that more than half (56%) of homeless people in Croydon are in the 25-44 years age band
- There has been a disproportionately high percentage of homeless people from the Black community, both currently and historically.

Health

- Childhood immunisation rates continue to be lower in Croydon than across London and England
- The estimated dementia diagnosis rate for 65+ years has been going up every year in Croydon.
- Croydon has the 6th highest proportion of adults (aged 18+) classified as overweight or obese in London.

Social Isolation

In Croydon, there are an estimated 9,860 older people who are lonely and 5,423 older people who experience intense loneliness. There are also 17,227 people aged 18-64 who are socially isolated.

In addition, recent research has shown that 48% of Croydon residents would be willing to do more to support a neighbour; this may also have a positive impact on the health and wellbeing of the population, and social isolation.

Findings - workforce

Croydon Council is one of the largest local authorities in London, employing over 3000 staff. In the financial year 2018/19 it published its [workforce profile](#) that indicated:

- Croydon staff are largely women, with almost two-thirds (65.4%) of LBC employees being reported as female.
- The vast majority of council staff reported their current gender to be the same as their birth gender. Under one percent of individuals disclosed that their current gender deviates from their birth gender and only 1.9% of individuals chose not to provide any details of their gender reassignment.
- A slight minority of 43.2% of employees are of non-white ethnicity, with 55.6% of Croydon staff being of white ethnicity, and 1.2% choosing not to disclose their ethnicity.
- The vast majority (89.4%) of Croydon employees have no reported disabilities, with 8.8% of employees reporting a disability. A fraction (1.8%) of the employees in question chose to not disclose their disability status.
- Across the range of Croydon Council staff, over 70% of employees fell between the ages of 35 and 60. The best represented age range was from 50 – 55, constituting almost 21% of Croydon staff. 16 – 20 and 70+ were the most poorly represented age brackets, accounting for only 0.7% and 0.8% of total LBC staff, respectively.
- A large majority (79.4%) of Council staff reported as being heterosexual. In contrast, a combined total of less than 10% of employees reported to be non-heterosexual, pertaining to homosexual/gay, bi-sexual, or other sexual preferences. Under a fifth of employees (15.6%) chose not to disclose their sexual orientation.
- Over half (52.4%) hold Christian beliefs. The second largest group was employees with no religious beliefs, which comprised of 24.2% of Croydon Council staff. Just over one in ten (12.3%) chose not to disclose their religious practice and a combined total of less than 10% of employees held Muslim, Jewish, Hindu, Sikh or Buddhist beliefs. A small minority (3.9%) of council employees held religious and/or beliefs which varied from those provided stated in the equality questionnaire.
- The vast majority (66.6%) of staff are married. Never married/ civil partnership was the second most abundant status, comprising of 20.6% of council employees. Nearly one in ten council employees reported to have divorced from their spouse, with 1.7% of employees being separated but still legally married.

Whilst the Council has a positive gender mix, there is still more to do on ethnicity and disability if we are to meet our aspiration of employing a workforce that is representative of our communities.

The equalities monitoring of our workforce indicates that there is an under-representation within the workforce across salary ranges, with a negative funneling of representation for BAME staff at senior level.

National context

The strategy is being developed against a backdrop of prevalent international and national themes, which have been particularly highlighted in recent months by the Covid-19 pandemic. The virus has been unequal in its impact, in particular on BAME communities, but this is a result of long standing structural inequalities and socio-economic determinants of health. We have also seen a strong social response to racism through the Black Lives Matter movement. Whilst media focus may have been on cases in the USA, racism remains a very real issue for us to tackle in the UK as well. Since the EU referendum we have seen a rise in hate crimes and racism. These provide the context for the backdrop against which the strategy has been written.

Local contextEquality Framework for Local Government (EFLG): Equality Peer Challenge

The EFLG is a national benchmarking and assessment tool that helps local authorities to identify what they do well and where they can make improvements to, and deliver better equality outcomes for staff, residents and service users.

In November 2019, the Council asked the Local Government Association (LGA) to conduct an Equality Peer Challenge against the “Achieving” level of the Equality Framework for Local Government Accreditation. It undertook a self-assessment against five performance criteria:

- Knowing your communities
- Leadership, partnership and organisational commitment
- Involving your communities
- Responsive services and customer care
- A skilled and committed workforce

The Council satisfied the criteria for the Achieving level of the EFLG, the level we agreed to be assessed. The LGA made a number of recommendations to improve equality outcomes based upon the findings during the 3 day visit, which are set out [here](#).

Stonewall 2019/20 Workplace Equality Index

Croydon Council has been a Stonewall Diversity Champion and participated in the Stonewall Workplace Equality Index since 2014. This process assesses the Council’s progress on lesbian, gay, bi and trans inclusion in the workplace.

The process allowed the Council to demonstrate its work in the following ten areas of employment policy and practice:

- Policies and benefits
- The employee lifecycle
- LGBT employee network group Allies and role models
- Senior leadership
- Monitoring
- Procurement
- Community engagement
- Clients, customers and service users
- Additional work

In 2019, Croydon was ranked 148 out of over 500 organisations that took part. Stonewall made a number of recommendations to improve inclusion for lesbian, gay, bi and trans employees in the workplace. This can be found [here](#)

We use equality information – qualitative and quantitative - to inform our strategies and plans. The information in these documents continues to improve but we acknowledge there are data gaps within existing sources which require further analysis and/or a need to find out information about new protected characteristics.

Reliable information is a critical tool that helps us demonstrate fairness and how we are using it in practical ways to improve people's lives. However, it is clear that in some cases we don't have the information or that we have the information but it hasn't been used in any analysis. We have data gaps in our information about some vulnerable groups of people and where we do have information it is not always sophisticated enough to allow us to draw useful inferences. For example we have patchy information about people who identify themselves as lesbian, gay, bisexual or transgender, religious/faith groups, newer communities as well as some of the of the new protected characteristics. There are gaps in our data about who uses our frontline services, especially transactional activity such as over the counter, over the telephone and using the web. We also have basic information about the number of complaints about discrimination but not the nature.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Deciding whether the potential impact is positive or negative

Table 1 – Positive/Negative impact

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. This will include working with partners to provide more	N/A	Borough Profile Croydon Observatory Consultation

[Is Britain Fairer? The state of equality and human rights](#)

[Health Inequity in England - The Marmot Review- 10 Years On](#)

LGBT Needs Assessment

opportunities for young people to share their views. The Council will also commit to empowering local people to participate and get involved in making decisions. It will engage and listen to staff residents and communities and work towards having open, honest and culturally appropriate conversations.

The Council will develop an annual equality communications plan to it undertake effective, consistent and meaningful communications with staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.

The plan will aim to champion equality, fairness, foster good relations between communities and counter discrimination, negative stereotypes or dispel myths. This also relates to the draft objective to ensure information about the council's work towards tackling inequality is easy to access and understand particularly for groups like older and young people

The council to work with its partners to identify gaps, assess needs, set priorities and equalities objectives. It will use data and insight to review, rationalise and redesign services, with a focus on meeting priority needs, identifying those with the highest degree of need and tailoring interventions to meet these as well as locating our services where they are needed.

Draft outcome 3 focuses on use partnerships to improve access and meet individual needs as they arise. The Council faces challenges around deprivation and inequalities in a range

of domains relating to income health, education and housing.

Young people in more deprived areas and those eligible for free school meals continue to have lower levels of attainment. This also relates to the draft objective to recognise the needs of individual groups and provide support to the most disadvantaged groups in the borough such as young care leavers and young BAME from specific communities. It will work with its partners to enable better education outcomes by offering support to vulnerable groups in targeted areas of the borough, including boys and those eligible for the PPG.

Like England as a whole, Black Caribbean pupils in Croydon have the greatest level of disproportionately when it comes to exclusion from school. The Council will continue to work with schools, local health services, and the community to reduce the need to exclude pupils.

In the East of the Borough there are known issues around lower average attainment scores for pupils, and a higher proportion of adults with no qualifications. Adults from a White ethnic background in Croydon in the 2011 Census were more likely to have no qualifications than adults from any other ethnic background. A third of the residents in both Fieldway and New Addington had no qualifications recorded. The proportion of White British residents in Fieldway and New Addington were 61.3% and 72.8% respectively. This also relates to the draft objective to offer support to groups that need it most to enable better education outcomes as well as to the draft objective to ensure

services are proactive in targeting groups that have accessibility issues as a result of mental health and language barriers

In common with much of the country, local child and adolescent mental health services are struggling to keep up with demand, often resulting in critical time being lost before diagnosis of developmental or mental health disorders. We want the local health service to work with the council and schools to look at new models that do more to bring services into schools and to work with families much earlier when there are problems.

Draft objective 2 under this outcome aims to support the creation of jobs that enhance quality of life particularly targeting those underrepresented in the employment sector identified as young people with income deprivation affecting children, 16% of children living in low income families and Croydon having the highest number of Looked After Children in London.

Draft outcome 4 of the strategy will focus on people in Croydon being supported to be in good health. Objective 1 under this outcome will see the Council working with partners to further tackle social isolation and bring people together, this will have a positive impact on older people

Objective 3 under this outcome will see the council work with its partners to open the door to health services, and support them to make sure residents know where and how to access services

The Council will also ensure it commissions suppliers that help us to address inequity and monitor their impact through our contract management framework. This will help us design and bring a focus on identifying and addressing issues and barriers that service users may have accessing services. Services should consider the needs of LGBT+ people across the life course, particularly for older people and consider individuals' previous experiences (e.g. discrimination).

The draft objective to increase our network across untapped communities, specifically harder to reach groups and their community leaders is designed to bring the focus to improving engagement mechanisms and structural barriers to enable people across a range of protected characteristics/under-represented groups to influence and participate in the decision making process.

Services will be required to be proactive in targeting groups that have accessibility issues. This will bring a focus to barriers to access to services on grounds of disability - physical, mental, digital and language. This will have a positive impact on older people

The draft objective to ensure our partners feel supported to reduce inequalities and discrimination that lead to school exclusions and young people entering the criminal justice system is designed to bring the focus on issues such as racial discrimination in schools, adultification and over-policing of young black boys, reducing the number of first time entrants to CJS, reducing school exclusions for groups such as Black

	Caribbean, looked after children and Gypsy, Roma and Traveller pupils		
Disability	<p>The draft objective that the Council's workforce reflects our diverse communities at all levels and take steps to close the disability pay gaps will have a positive impact on people living with a disability as they will be more represented at senior levels within the organisation</p> <p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. The Council will also commit to empowering local people to participate and get involved in making decisions. It will engage and listen to staff, residents and communities and work towards having open, honest and culturally appropriate conversations. This will give a positive impact on people living with visible and invisible disabilities.</p> <p>The Council will develop an annual equality communications plan to help it undertake effective, consistent and meaningful communications with it staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.</p> <p>The plan will aim to champion equality, fairness, foster good relations between communities and counter discrimination, negative stereotypes or dispel myths.</p> <p>The council will work with its partners to identify gaps, assess needs, set priorities and equalities objectives. It will use data and insight to review, rationalise and redesign services, with a focus on meeting priority</p>	N/A	<p>Consultation</p> <p>Equality Framework for Local Govt. Accreditation</p> <p><u>Is Britain Fairer? The state of equality and human rights</u></p>

needs, identifying those with the highest degree of need and tailoring interventions to meet these as well as locating our services where they are needed. This will give a positive impact on people living with visible and invisible disabilities.

Draft outcome 3 of the strategy will see the council using partnerships to improve access and meet individual needs as they arise

Draft objective 2 under this outcome aims to support the creation of jobs that enhance quality of life particularly targeting those underrepresented in the employment sector identified as people with disabilities. The Council will work with its partners including developers to continue to create fair employment and good work for all and in particular those furthest away from the job market as we work towards building an inclusive economy.

Draft objective 3 under this outcome will ensure services are proactive in targeting groups that have accessibility issues as a result of disability, age, mental health, language, digital and/ or physical barriers is designed to bring to focus challenges around equity of access to services and buildings.

The Council will take steps to ensure access to and appropriateness of services is monitored regularly. We will work towards supporting access to translation is easy, available and utilised and accommodate the needs of sight and hearing impaired staff and members of the public.

Draft outcome 4 of the strategy will focus on ensuring people in Croydon are supported to be in good health. Objective 1 under this outcome will see the Council working with partners to further tackle social isolation and bring people together

Objective 3 under this outcome will see the council work with its partners to open the door to health services, and support them to make sure residents know where and how to access services. This is designed to bring the focus to barriers to access to services on grounds of disability - physical, mental, digital and language

The draft equality objective to become a visible and active community leader and ambassador of equality by addressing social inequities is designed to bring to focus challenges around deprivation and inequalities in regards to income. It will not only focus on income, but on other factors including health, education and housing to bring greater focus to the needs of those at greatest or at risk of becoming further disadvantaged. Disabled people are also more likely to be in poverty. They also face poorer health and lack of access to suitable housing. Without the fundamental building blocks of good education, an adequate standard of living, and being safe and healthy, disabled people are often unable to participate fully in society. This also relates to the draft objective to recognise the needs of individual groups and provide support to the most disadvantaged groups in the borough.

The draft objective services are proactive in targeting groups that have accessibility

	<p>issues as a result of disability, age, mental health, language and/ or physical barriers</p> <p>The Council will also develop an autism strategy to raise awareness of autism and key challenges in the Borough</p>		
Gender	<p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. This will include increasing its networks across seldom heard groups, currently identified as women.</p> <p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. The Council will also commit to empowering local people to participate and get involved in making decisions. It engage and listen to staff residents and communities and work towards having open, honest and culturally appropriate conversations</p> <p>The Council will develop an annual equality communications plan to help us undertake effective, consistent and meaningful communications with our staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.</p> <p>The plan will aim to champion equality, fairness, foster good relations between communities and counter discrimination, negative stereotypes or dispel myths.</p> <p>The council to work with its partners to identify gaps, assess needs, set priorities and</p>	N/A	

equalities objectives. It will use data and insight to review, rationalise and redesign services, with a focus on meeting priority needs, identifying those with the highest degree of need and tailoring interventions to meet these as well as locating our services where they are needed.

Draft objective 2 under this outcome aims to support the creation of jobs that enhance quality of life particularly targeting those underrepresented in the employment sector identified as women. The Council will work with its partners including developers to continue to create fair employment and good work for all and in particular those furthest away from the job market as we work towards building an inclusive economy.

The draft equality objective to see more residents are given support to enter education, gain skills and access quality employment is designed to bring focus to challenges around gender stereotypes where young women are under-represented in STEM courses, despite girls performing better than boys in education, gender segregation is also prominent in apprenticeships. All of these factors contribute to women still being more likely to be in low-pay occupations. This also relates to the draft objective more residents are given support to enter education, gain skills and access quality employment as well as the draft objective to offer support to groups that need it most to enable better education outcomes

Sexual and domestic violence is a persistent and growing concern, and affects women and

	<p>girls disproportionately. This will be addressed by the future Community Safety Strategy.</p> <p>Draft outcome 4 of the strategy will focus on people in Croydon being supported to be in good health. Objective 1 under this outcome will see the Council working with partners to further tackle social isolation and bring people together</p> <p>Objective 3 under this outcome will see the council work with its partners to open the door to health services, and support them to make sure residents know where and how to access services.</p>		
Gender Reassignment	<p>The draft objective to increase our network across untapped communities, specifically seldom heard groups and their community leaders is designed to bring the focus to improving engagement mechanisms and structural barriers to enable people across a range of protected characteristics/under-represented groups to influence and participate in the decision making process. This will have a positive impact on those from this community.</p> <p>The Council will develop an annual equality communications plan to help us undertake effective, consistent and meaningful communications with our staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.</p> <p>The plan will aim to champion equality, fairness, foster good relations between communities and counter discrimination, negative stereotypes or dispel myths.</p>	N/A	

	<p>The council to work with its partners to identify gaps, assess needs, set priorities and equalities objectives. It will use data and insight to review, rationalise and redesign services, with a focus on meeting priority needs, identifying those with the highest degree of need and tailoring interventions to meet these as well as locating our services where they are needed. This will have a positive impact on those from this community.</p>		
Marriage or Civil Partnership	<p>None specifically identified from the information provided in the sources mentioned previously.</p>	N/A	
Religion or belief	<p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. The Council will also commit to empowering local people to participate and get involved in making decisions. It engage and listen to staff residents and communities and work towards having open, honest and culturally appropriate conversations</p> <p>The Council will develop an annual equality communications plan to help us undertake effective, consistent and meaningful communications with our staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.</p> <p>The plan will aim to champion equality, fairness, foster good relations between communities and counter discrimination, negative stereotypes or dispel myths.</p> <p>The council to work with its partners to identify gaps, assess needs, set priorities and equalities objectives. It will use data and insight to review, rationalise and redesign</p>		

	<p>services, with a focus on meeting priority needs, identifying those with the highest degree of need and tailoring interventions to meet these as well as locating our services where they are needed.</p> <p>A number of draft equality objectives are designed to improve the outcomes for people who share this protected characteristic in particular bring greater focus to the issues affecting living in the poorest parts of the borough and those who experience hate crime.</p>		
Race	<p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. This will include increasing its network across seldom heard groups, currently identified refugee and asylum seekers</p> <p>The draft objective that the Council's workforce reflects our diverse communities at all levels will provide more equity of opportunity for BAME staff who are underrepresented at senior levels within the organisation. It will also take steps to close the ethnicity pay gap</p> <p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. The Council will also commit to empowering local people to participate and get involved in making decisions. It engage and listen to staff residents and communities and work towards having open, honest and culturally appropriate conversations</p>	N/A	<p>Workforce Strategy</p> <p>Workforce Profile</p> <p>Consultation</p> <p><u>Is Britain Fairer? The state of equality and human rights</u></p>

The Council will develop an annual equality communications plan to help us undertake effective, consistent and meaningful communications with our staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.

The plan will aim to champion equality, fairness, foster good relations between communities and counter discrimination, negative stereotypes or dispel myths.

The council will work with its partners to identify gaps, assess needs, set priorities and equalities objectives. It will use data and insight to review, rationalise and redesign services, with a focus on meeting priority needs, identifying those with the highest degree of need and tailoring interventions to meet these as well as locating our services where they are needed.

Draft objective 2 under this outcome aims to support the creation of jobs that enhance quality of life particularly targeting those underrepresented in the employment sector identified as BAME. The Council will work with its partners including developers to continue to create fair employment and good work for all and in particular those furthest away from the job market as we work towards building an inclusive economy.

Draft outcome 4 of the strategy focuses on people in Croydon being supported to be in good health. Public Health England released a review of the disparities in risk and outcomes of COVID-19 in June 2020, with a follow up paper on understanding the impact

of COVID-19 on BAME Communities which contained recommendations for action. . Harms caused by COVID-19 has replicated existing health inequalities, and in some cases increased them.

The largest disparity found was age, but the risk of dying among those diagnosed with COVID-19 was also higher in males, than females; higher in those living in the more deprived areas than those living in the least deprived; and higher in those in Black, Asian and Minority Ethnic (BAME) groups than in White ethnic groups.

Objective 3 under this outcome will see the council work with its partners to open the door to health services, and support them to make sure residents know where and how to access services

The draft equality objective to become a visible and active community leader and ambassador of equality by addressing social inequities is designed to bring to focus challenges around deprivation and inequalities in regards to income. It will not only focus on income, but on other factors including health, education and housing to bring greater focus to the needs of those at greatest or at risk of becoming further disadvantaged.

Poverty is prevalent among some ethnic minorities. Black African, Bangladeshi and Pakistani people are still the most likely to live in poverty and deprivation, and – given the damaging effects of poverty on education, work and health – families can become locked into disadvantage for generations

Gypsy, Roma and Travellers face multiple disadvantages across different areas of life. They achieve below-average results at school, experience difficulties accessing healthcare, worse health, and often have low standards of housing.

Homelessness is also on the rise, putting more people in a precarious position and particularly affecting people from ethnic minorities. Of the households accepted as homeless in Croydon, around half are made up of people from the Black community, around a quarter are from the White community with the remainder made up of residents from all the other communities.

This also relates to the draft objective to recognise the needs of individual groups and provide support to the most disadvantaged groups in the borough.

The draft objective more residents are given support to enter education, gain skills and access quality employment is designed to bring focus to the need for equitable access to quality education, housing and living environments and in particular those from disadvantaged backgrounds.

The draft objective to increase our network across untapped communities, specifically harder to reach groups and their community leaders is designed to bring the focus to improving engagement mechanisms and structural barriers to enable people across a range of protected characteristics/under-represented groups to influence and participate in the decision making process. This also relates to the draft objective to ensure information about the council's work

	<p>towards tackling inequality is easy to access and understand as well as the draft objective to ensure key information about local communities is collected, analysed and used to inform decisions and improve services</p>		
Sexual Orientation	<p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. This will include increasing its network across seldom heard groups, currently identified as LGBT+</p> <p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. The Council will also commit to empowering local people to participate and get involved in making decisions. It engage and listen to staff residents and communities and work towards having open, honest and culturally appropriate conversations</p> <p>The Council will develop an annual equality communications plan to help us undertake effective, consistent and meaningful communications with our staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.</p> <p>The plan will aim to champion equality, fairness, foster good relations between communities and counter discrimination, negative stereotypes or dispel myths.</p> <p>The council will work with its partners to identify gaps, assess needs, set priorities and equalities objectives. It will use data and insight to review, rationalise and redesign</p>	N/A	<p>Stonewall Workplace Equality Index</p> <p>Equality Framework for Local Govt. Accreditation</p> <p>LGBT Needs Assessment (Draft)</p>

services, with a focus on meeting priority needs, identifying those with the highest degree of need and tailoring interventions to meet these as well as locating our services where they are needed.

The council work with its partners to open the door to health services, and support them to make sure residents know where and how to access services, this will have a positive impact on those who identify as LGBT+

The draft objective to ensure we commission suppliers that help us to address inequity and monitor their impact through our contract management framework is designed to bring a focus on identifying and addressing issues and barriers that service users may have accessing services (across protected characteristics and the life course). This would include monitoring their client and customer base to increase their reach and impact across all protected characteristics

A number of draft equality objectives are designed to improve the outcomes for people who share this protected characteristic in particular bring greater focus to the issues affecting living in the poorest parts of the borough and those who experience hate crime.

The draft objective to increase our network across untapped communities, specifically harder to reach groups and their community leaders is designed to bring the focus to improving engagement mechanisms and structural barriers to enable people across a range of protected characteristics/under-

	<p>represented groups to influence and participate in the decision making process. This also relates to the draft objective to ensure key information about local communities is collected, analysed and used to inform decisions and improve services</p>		
Pregnancy or Maternity	<p>The draft objective to ensure that our decision making reflects the views of Croydon residents by creating a diverse workforce is designed to bring a focus on pursuing a workforce diversity profile that reflects the local community at all levels. Bullying and sexual harassment are widespread in the workplace and in education, and three-quarters of new mothers have had a negative or potentially discriminatory experience at work as a result of pregnancy or maternity Objective will be aligned with the Workforce Strategy</p> <p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. The Council will also commit to empowering local people to participate and get involved in making decisions. It engage and listen to staff residents and communities and work towards having open, honest and culturally appropriate conversations</p> <p>The Council will develop an annual equality communications plan to help us undertake effective, consistent and meaningful communications with our staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.</p> <p>The plan will aim to champion equality, fairness, foster good relations between</p>	N/A	<p>Is Britain Fairer? The state of equality and human rights</p>

	communities and counter discrimination, negative stereotypes or dispel myths.		
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Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

3.2 Additional information needed to determine impact of proposed change

Table 2 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	Information source	Date for completion
In some cases we don't have the information or that we have the information but it hasn't been used in any analysis. We have data gaps in our information about some vulnerable groups of people and where we do have information it is not always sophisticated enough to allow us to draw useful inferences. For example we have patchy information about people who identify themselves as lesbian, gay, bisexual or transgender, religious/faith groups, newer communities as well as some of the of the new protected characteristics. There are gaps in our data about who uses our frontline services, especially transactional activity such as over the counter, over the telephone and using the web. We also have basic information about the number of complaints about discrimination but not the nature.		Ongoing

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)

2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Table 3 – Impact scores

Column 1 PROTECTED GROUP	Column 2 LIKELIHOOD OF IMPACT SCORE	Column 3 SEVERITY OF IMPACT SCORE	Column 4 EQUALITY IMPACT SCORE
	Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group. Equality impact score = likelihood of impact score x severity of impact score.
Age	1	1	1
Disability	1	1	1
Gender	1	1	1
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	1	1	1
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	1	1	1

Equality Analysis

4. Statutory duties

4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Important note: Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

Table 4 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.

Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability				
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				
Age				
Religion or belief				
Pregnancy or maternity				

Equality Analysis

Marriage/civil partnership				
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6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter X in column 3 (Conclusion) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.	x
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form	
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Cabinet Date: 18.02.21

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7. Sign-Off

Equality Analysis

Officers that must approve this decision	
Equalities Lead	Name: Yvonne Okiyo Date: 20.01.21 Position: Equalities Manager
Director	Name: Gavin Handford Date: 20.01.21 Position: Director Policy and Partnerships

EQUALITY STRATEGY FOR CROYDON

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2020 – 2024

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FOREWORD

I am pleased to introduce the Council's Equality Strategy 2020-2024 which provides a framework for our equality objectives, what we want to achieve, actions we will take to tackle and address inequality and how we will measure our progress. This is a living document that will be updated every year so that our staff, residents and communities are clear about the progress we have made.

We are very proud of our borough, its diverse mix of people and places that make it a great place to live and work. We want growth that will benefit all our communities, and improve equality of, and access to, opportunity.

We acknowledge the Council has an integral role in advancing equality of opportunity, fostering good community relations and eliminating unlawful discrimination and harassment. We also have a key role in enabling those who are disadvantaged to reach their full potential and play an active part in the borough's future.

The Council is committed to tackling social and economic inequalities but recognises we face difficult decisions ahead. Those decisions will always be made with the best interest of our communities at heart as we continue to strive towards eradicating disadvantage which left unchecked, remain throughout their life. We will be open and transparent about the challenges ahead; some of which are immediate such as the financial crisis, whereas others are long term like having an ageing population.

We recognise the Council's biggest asset is our staff and it is important to be a high performing organisation that is collaborative, inclusive and innovative, an employer that let's talent flourish and build workforce capability to meet our ambitions and reflects Croydon's communities. The new administration has set its priorities for renewing the council over the next three years in the face of its most serious financial challenges. The administration's ambition is to build a compassionate, resilient and caring Croydon, where no one is left behind. The council will therefore focus its efforts on the most vulnerable and most excluded residents, including those living in extreme poverty. It cannot achieve this alone. It will therefore seek to work through its partnerships with the NHS and the wider public sector, and with borough's employers and businesses, the voluntary sector and residents.

Councillor David Wood, Cabinet Member Safer Croydon and Communities

INTRODUCTION

Equality and inclusion is the very foundation upon which we will strive to ensure residents are treated fairly and equitably by the Council and its service providers, giving individuals the opportunity to be who they are and achieve the successes they aspire to. We will take steps to promote understanding, tackle prejudice and remove or minimise disadvantage.

The purpose of the Council's Equality Strategy is to provide a detailed insight into our ongoing commitment to equality, set out in one place our equality objectives and other arrangements for embedding equality into everything we do and, perhaps most importantly, set out where we must improve. We have developed this strategy in partnership with Croydon's residents, businesses, Voluntary and Community Sector (VCS) and staff – with a view to delivering a combined strategic vision for equality across the borough.

The Council's equality objectives, have been prioritised under one or more of the following:

- Biggest challenges facing the council;
- Specific and measurable,
- Based on evidence of different groups of people and feedback from those affected;
- Caused by social, cultural, or economic factors that affect people and their life chances
- An issue that is getting worse and requires attention.

The strategy was developed against a backdrop of prevalent international and national themes, which have been particularly highlighted by the Covid-19 pandemic. The virus has been unequal in its impact, in particular on Black and Minority Ethnic residents, but this is a result of long standing structural inequalities and socio-economic determinants of health. We have also seen a strong social response to racism through the Black Lives Matter movement. Whilst media focus may have been on cases in USA, racism remains a very real issue for us to tackle in the UK as well. Since the EU referendum, we have seen a rise in hate crimes and racism.

This strategy comes at a time of great change for Croydon and we want to support our staff and residents through tough times. Croydon Council faces a financial crisis of unprecedented severity. Key to delivering this strategy will be aligning limited resources to deliver positive outcomes, as far as is practicable at a time when the council is under significant financial pressure. The new administration has provided a framework of priorities for 2021-24 and ways of working to inform the task of reshaping the council and refocusing its work which is required in order to put it on a stable financial footing.

The three priorities are:

- To live within our means, balance the books and provide value for money
- To focus on tackling ingrained inequality and poverty in the borough
- To focus on providing the best quality core service we can afford, in particular social care for the most vulnerable people and keeping streets clean and safe.

We face difficult decisions ahead, and cannot do everything we would like or see a need for, but those decisions will always be made with the best interest of our communities. We will continue to strive towards eradicating inequalities and ensure Croydon is a place where all have the opportunity to live, work and flourish.

We will work efficiently to meet rising demand and the challenges ahead as we work differently with our partners and our communities to deliver services for our residents, keeping equalities a priority in both design and delivery.

Developing the strategy and its objectives

The Council, like other public bodies, must publish information about equality every year and equality objectives every four years. Our approach builds on the partnership work undertaken throughout the year to identify priorities through assessments, surveys and consultation exercises. These activities highlight the issues that need to be addressed in the years ahead. It is from this information that the equality objectives have been determined and final consultation has taken place.

In summary this strategy has been developed by:

- Gathering information from a range of impact and needs assessments;
- Identifying key challenges and inviting people to confirm these;
- Working through other forums to put actions in place

To avoid duplication, and create wider more diverse and varied efficiencies, we identified existing synergies and opportunities by examining current Council strategies, policies and plans that support delivery of equality, diversity, inclusion and/or can be mapped to existing commitments. It should be noted that there are many Council services who through their strategies are currently contributing to tackling inequalities and addressing disadvantage across the borough for protected groups. Some of the equality objectives will be found embedded in other relevant strategies and plans that are published such as the health and wellbeing strategy, early year's foundation strategy and school improvement plan.

Importantly, the absence of an equality issue in these objectives does not mean that it is not significant, or that we will ignore that issue, rather to demonstrate that we focus our effort and limited resource in addressing the greatest inequalities.

The Equality Strategy and supporting actions are 'living' documents. The strategy and action plan will be refreshed every year to ensure that our policy and practice takes into account any emerging and prevalent national and local priorities. We will publish an annual report setting out our progress.

We will establish a board to coordinate the equality arrangements in the Council for embedding equality and managing the implementation of the strategy. The board will be responsible for the evaluation (and review) of this Equality Strategy. It will be reviewed annually by all departments and partnerships that own the objectives, measures and actions. The review will be coordinated by the Council's Equality Manager. Progress will be regularly reported to the senior management team, cabinet, scrutiny and themed partnership boards such as the Health and Wellbeing Board when required. We will implement an appropriate involvement strategy during these reviews which will be proportionate to the degree of change likely to be needed.

The strategy will be delivered in full within a period of four years. This will include a comprehensive analysis of our measures to inform the development of new objectives.

KEY STATISTICS



Population

386,710 current total population

445,000 population by 2031

0-17 years - 94,931 (highest in London)

18-64 years - 238,582 (3rd highest in London)

65+ - 53,197 - (3rd highest in London)

48.6 % Male

51.4% Female

For further information on the Croydon's population overview

[click here](#)

Deprivation

- Croydon has become relatively less deprived compared to other local authorities in England between IMD 2015 and IMD 2019
- There remains geographic inequality in the distribution of deprivation in the borough with the North and East of the borough remaining more deprived

Wealth inequality

There remains geographic inequality in the distribution of wealth in the borough with the North and East of the borough remaining more deprived. Croydon contains some of the poorest neighbourhoods in the country.

Ethnicity

- Croydon has a higher proportion of residents from the BAME communities compared to the national average. There was more diversity in the younger age group population in Croydon in 2011.

For further information on Croydon's breakdown by race [click here](#)

Proficiency in English

- In the 2011 census, 14.5% of people in Croydon had a language other than English recorded as their main language
- 2.5% of the total Croydon population at the time could not speak English well or at all.
- In the 2011 Census 14.5% of people in Croydon had a language other than English recorded as their main language, 51.5% of individuals from these cohort were 85+ years. This older cohort made up 2.9% of all 85+ year olds in Croydon.
- A higher proportion of females (19.7%) compared to males (14.5%) could not speak English or speak English well.

Age Profile in Croydon

The latest ONS Mid-year estimate (MYE) indicates that 1 in 4 Croydon residents (24%) is aged between 0-17 years. This has implications on the types of services required to cater for the youth in Croydon.

For further information on children and young people in Croydon

[click here](#)

Religion

Just over half (56.4%) of respondents to the 2011 Census in Croydon stated that they were Christian. About 1 in 5 (20.0%) stated that they had no religion. Significantly 7.6% of respondents did not state their religion.

For further information on Religion and Belief in Croydon [click here](#)

Sexual orientation

Sexual orientation was not captured by the 2011 Census. Based on ONS estimates, across London it was estimated that 2.6% of the population in 2014 identified themselves as gay, lesbian or bisexual. This was higher than the national average of 1.6%.

Gender identity

Data on the gender identity is not routinely captured. A person's innate sense of their own gender, whether male, female or something else may or may not correspond to the sex assigned at birth. The Gender Identity and Research Society has estimated that nationally 1% of the population may be gender variant to some degree, with 0.2% of the population likely to seek medical treatment, at some stage, to present in the opposite gender

Disability

There is not one comprehensive figure that can give a true picture of the total number of people with a disability in Croydon.

The 2011 Census figures showed that 14.1% of the population in Croydon had their day-to-day activities limited to some extent by a

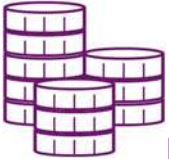
long-term health problem or disability. 22,493 people had their day-to-day activities limited a lot, whilst 28,134 had their day-to-day activities limited a little.

For further information on individuals with long term health or a disability in Croydon [click here](#)



Education and Skills

- Attainment at Key Stage 2 is improving in Croydon but there is still more to do in this area.
- Take up of funded hours in early years settings is still below national and regional levels
- Whilst, in recent years, Croydon's GLD has been above the national, it has remained stubbornly lower in all aspects of language development, particularly in the aspect of 'speaking'.
- The proportion of children achieving grades AAB or above at Key Stage 5 is much lower than the national and regional averages
- Since 2015 at local, regional and national levels there has been a lower proportion of children from Black backgrounds achieving Attainment 8 scores
- Like with England as a whole Black Caribbean pupils in Croydon have the greatest level of disproportionately when it comes to exclusion from school.



Economy

- The job density rate measures the ratio of total jobs population aged 16-64 years. The Croydon rate is lower than national and regional levels.
- The proportion of out of work claimants has risen by around 5% since March 2020 – directly as a result of the impact of the Covid19 pandemic on the economy.
- There has been a huge increase in unemployment for 18-24 year olds and 50-64 year olds since April 2020.
- Croydon rate of out of work claimants has increased.



Housing

- Croydon had 1,657 net additional dwellings in 2019/2020. This is a 42% reduction on the 2016/2017 figure.
- For 2019/2020, 7 in 10 homeless households in Croydon were made up of residents from the non-White communities.
- Social housing in Croydon is mainly concentrated in the northern parts and the eastern edge of the borough.
- Over the years, by far the highest proportion of accepted homeless households in Croydon have been made up of lone parents with dependent children
- Latest figures for 2019/2020 show that more than half (56%) of homeless people in Croydon are in the 25-44 years age band
- There has been a disproportionately high percentage of homeless people from the Black community, both currently and historically.



Health

- Childhood immunisation rates continue to be lower in Croydon than across London and England
- The estimated dementia diagnosis rate for 65+ years has been going up every year in Croydon.
- Croydon has the 6th highest proportion of adults (aged 18+) classified as overweight or obese in London.

Social Isolation

In Croydon, there are an estimated 9,860 older people who are lonely and 5,423 older people who experience intense loneliness. There are also 17,227 people aged 18-64 who are socially isolated.

In addition, recent research has shown that 48% of Croydon residents would be willing to do more to support a neighbour; this may also have a positive impact on the health and wellbeing of the population, and social isolation.

PLAN ON A PAGE

VISION

Croydon is a place of opportunity where everyone can belong, addressing the needs and aspirations of all those who live and work in the borough

The Council addresses social inequities as a community leader and employer

- OBJECTIVE 1: The Council's workforce reflects our diverse communities at all levels
- OBJECTIVE 2: The Council acts as a role model and champions a fair society
- OBJECTIVE 3: We ensure equality training is central to the way work, is regularly undertaken, and is reviewed to meet changing needs

We work with residents to better understand our communities

- OBJECTIVE 1: Continue to increase our network across seldom heard groups
-
- OBJECTIVE 2: Information about the Council's work towards tackling inequality is easy to access and understand
- OBJECTIVE 3: Data about local communities is more effectively collected, analysed and used to inform decisions and improve services

Use partnerships to improve access and meet individual needs as they arise

- OBJECTIVE 1: Enable better education outcomes by offering support to groups who need it most
- OBJECTIVE 2: Support the creation of jobs that enhance quality of life
- OBJECTIVE 3: Services are proactive in targeting group that have accessibility issues as a result of disability, age, mental health, disability, language, digital and/or physical barriers
- OBJECTIVES 4: Inequalities that lead to school exclusions and young people entering the criminal justice system are addressed, specifically for black boys, white working class boys, gypsy roma and travellers, and those accessing free school meals.

People in Croydon are supported to be in good health

- OBJECTIVE 1: Work with partners to tackle social isolation and bring people together
- OBJECTIVE 2: With our partners use our knowledge of specific health challenges to support improvements
- OBJECTIVE 3: We work with our partners to open the door to health services, and support them to make sure residents know where and how to access services

OUTCOME ONE: The Council addresses social inequities as a community leader and an employer

What do we want to achieve?

- 1. The Council's workforce reflects our diverse communities at all levels
- 2. The Council acts as a role model and champions a fair society
- 3. The Council ensures equality training is central to the way we work, is regularly undertaken, and is reviewed to meet changing needs

The strategy comes at a time when there is renewed drive for reducing inequalities nationally. The Council recognises its community leadership role in addressing these issues and championing a fairer society.

Strong, visible leadership is essential to effectively embed equality throughout the organisation and community at large. The Council will ensure our leaders are not only supporting but also more importantly driving the change and championing equality. A board will be established to provide clear accountability for change and ensure actions continued to be followed through.

The Council want to integrate equality into everything it does by working in partnership with those who provide services on our behalf to support the Council to meet its equality objectives. We will work with our staff, communities and the voluntary and community sector to ensure shared equality priorities, objectives and outcomes for local areas are understood and acted on. We also want to use equality analysis as an effective tool to identify needs and improve outcomes, address gaps and reduce inequality.

What actions will we take?

- 1. Develop annual performance indicators to measure recruitment, learning and development, career progression and employee relations
- 2. Publish annual pay audit around gender, disability and race and implement action plan to reduce the gaps
- 3. Develop Borough-wide Equalities Pledge
- 4. Establish governance to ensure equality is at the centre of service delivery
- 5. All Council contracts contribute towards delivering our equality objectives

The council believes in the dignity of all people and their right to respect and equality of opportunity. We value the strength that comes with difference and the positive contribution that diversity brings to our community. Our aspiration is for Croydon to be safe, welcoming and inclusive. It is for this reason we will develop an Equality Pledge that commits signatory public, voluntary or private sector organisations to appreciate and value the benefits that different communities contribute to Croydon. The pledge will have principles around adopting the Croydon Black Lives Matter Charter, promoting anti-racism, signing up to national benchmarks and initiatives such as Race at Work Charter, Workforce Race Equality Standards for Social Care (WRES), Race Equality Week, NHS Speak Up, Stonewall Workplace Equality Index, Disability Confident and the Equality Framework for Local Government (EFLG).

- 6. Ensure that every strategy, delivery plan and staff appraisal has an equality objective linked to it
- 7. Ensure every Equality Impact Assessment is evidence driven
- 8. Equality Impact Assessments considered by scrutiny on an annual basis to ensure scrutiny members continue to consider the equality implications of reports they look at
- 9. Increase number of councillor equality champions
- 10. Review current equality skills, knowledge and training available to meet service needs and identify gaps
- 11. Develop and monitor mandatory equality training including antiracism for Councillors in line with staff training
- 12. Support staff to improve the disclosure rates for equality data and understanding of how we use it to inform positive initiatives

We welcome the diversity of our staff and customers and regard this as the strength of our borough. We want to continue to improve and increase diversity at senior levels across the organisation and our workforce profile to reflect Croydon's communities and in particular under-represented groups - at all levels – so those in decision-making positions reflect the communities they serve.

Nationally and locally we know that there are issues around pay gaps for under-represented groups and in particular in relation to gender and ethnicity. The council has made some progress to close the gap in relation to gender, however, the pay quartiles show that (typically) white employees occupy a higher proportion of the upper pay quartiles compared to their representation in the workforce and BAME employees occupy a lower proportion of upper pay quartiles compared to their representation in the workforce. We recognise there is more to do to address areas of race inequalities. The Council will continue to regularly monitor, analyse and publish employment data and more importantly take actions to address identified trends

The Council aims to embed equalities practice across the organisation. It believes equality is everyone's business and all staff including anyone we work with or commissioned to work on our behalf, has a responsibility to advance equality, promote good relations and eliminate discrimination in their day-to-day work. In working towards achieving this aim, the Council provides all staff with equality and diversity training so officers gain the relevant knowledge and skills to mainstream excellent equality best practice. We will also support our partners such as the Octavo Partnership to deliver

What will success look like?

1. Diverse recruitment panels and anonymised shortlisting for the Council is monitored and reviewed
2. Workforce profile that reflects Croydon's communities and in particular under-represented groups - at all levels
3. Increased participation on available leadership programmes from all under-represented protected characteristics
4. Improvement in closing gender, disability and ethnicity pay gaps
5. Equality disclosure rate is 85% across all protected characteristics
6. Equalities pledge developed and reflected in lived experience
7. Every strategy, delivery plan, Council contract and staff appraisals have equality objectives
8. Equality Impact Assessments (EIA) are data driven and demonstrate evidence and impact (where change has been made in relation to the EIA).
9. 100% of new starters and councillors complete Equality Essentials, Unconscious Bias training and other appropriate designated training and this is refreshed on a regular basis

bespoke training packages to target support to schools where there are concerns about pupil outcomes.

OUTCOME TWO: We work with our residents to better understand our communities

What do we want to achieve?

- 1. Data about local communities is more effectively collected, analysed and used to inform decisions and improve services
- 2. Continue to increase our network across seldom heard groups, currently identified as LGBT+, refugee and asylum seekers, and women
- 3. Information about the council's work towards tackling inequality is easy to access and understand

The administration's new priorities and ways of working highlight the need for the Council's relationship with residents, communities, businesses and partners. In working towards this aim, it will fully involve the residents of Croydon, its communities and its partners in its journey to becoming an efficient, effective and financially sustainable council.

National and local research tells us that seldom heard groups are too often let down by structures and services that do not consider their needs. An example of this is it is unclear what proportion of our population are LGBT+ and what the needs of this population are. As such, the true extent of inequalities is unknown.

The Council already collects and uses information about the people who use its services and what they think about us. It also recognises the importance of collecting and using equality monitoring information as one of the critical ways in which we demonstrate compliance with the general equality duty.

What actions will we take?

- 1. Increase the number of partners and local influencers that represent and/or work with identified seldom heard groups
- 2. Ensure all formal consultations have an Equality Impact Assessment
- 3. Develop annual Equality Communications plan to include key messages/updates and actions below:
 - share our equality annual report with our partners
 - publish an executive summary demonstrating progress
 - publish equality data via Croydon Observatory

Most of the available equality information relates to age, gender, disability and ethnicity. However, it is clear that in some cases we don't have the information or that we have the information but it hasn't been used in any analysis. We have data gaps in our information about some vulnerable groups of people and where we do have information it is not always sophisticated enough to allow us to draw useful inferences. For example we have patchy information about people who identify themselves as lesbian, gay, bisexual or transgender, religious/faith groups, newer communities as well as some of the of the new protected characteristics. There are gaps in our data about who uses our frontline services, especially transactional activity such as over the counter, over the telephone and using the web. We also have basic information about the number of complaints about discrimination but not the nature.

We recognise the importance of having good quality information and how this can help target resources and improve outcomes for people. The Council will work to ensure equality data is complete, comprehensive and timely. We want to create a spirit of questioning – consistently and routinely interrogating services/access/process and outcomes with a lens of inequalities. Departments will need to put in place plans to

4. Support staff to improve what comprehensive equality data is collected and how we can use it
5. Work with partners to use our collective evidence to set future equality objectives
6. Work with partners to provide more opportunities for young people to share their views

What will success look like?

1. Baseline data available on who is engaging with us to identify gaps
2. Service user surveys contain ‘how satisfied or dissatisfied are you that the council listens and acts on your feedback’ and measure improvements to this response
3. Standardised equalities data is captured by services and used to make decisions
4. Equality communications plan developed and reviewed on an annual basis

address any gaps and issues in relation to information about local communities and their protected characteristics.

Equality data will be published to enable voluntary and community sector partners/health colleagues and stakeholders to access and use the information (including information about health inequality) and allow the council to work with its partners to identify gaps, assess needs, set priorities and equalities objectives.

At a time when Council resources are limited, we will use data and insight to review, rationalise and redesign services, with a focus on meeting priority needs, identifying those with the highest degree of need and tailoring interventions to meet these as well as locating our services where they are needed.

The Council interacts with the people who use its services, employees and residents. It works in partnership with its Councillors who are also committed to empowering local people to participate and get involved in making decisions. We want to engage and listen to our people and have open, honest and culturally appropriate conversations.

Staff can get involved and influence priorities via the organisations Culture Ambassadors, one-to-one's and team meetings, Council intranet and surveys. The Council also has a range of staff diversity networks (namely Race Equality Network, Disability Network, Women's Network, LGBT+Allies Network, Carers Network and Mental Health and Wellbeing Network). Alongside representatives from the community, officers take part in a range of other forums that shape policy and the design of services such as the Mobility Forum, Faiths Together in Croydon and Local Strategic Partnerships.

Engagement takes a wide variety of forms, increasingly utilising online communication channels. We recognise these online methods offer the potential to build engagement that is practical, affordable and capable of engaging a much greater audience than some other channels allow. However, these methods will not be suitable for every purpose or everyone and we are conscious that some vulnerable and seldom heard groups are often digitally excluded.

Undertaking an Equality Impact Assessment as well as undertaking user testing/user research will enable the Council to consider the best methods to consult and identify

which groups are not engaging. We will also provide feedback on the outcomes of consultations via the Council's Get Involved platform.

We will develop an annual equality communications plan to help us undertake effective, consistent and meaningful communications with our staff, residents, communities and partners as well as share key messages on matters of equality and inclusion. The plan will aim to champion equality, fairness, foster good relations between communities and counter discrimination, negative stereotypes or dispel myths. Going forward we want to be open and transparent about what we are doing, the progress we have made as well as the challenges we face.

DRAFT

OUTCOME THREE: Use partnerships to improve access and meet individual needs as they arise

What do we want to achieve?

- 1. Enable better education outcomes by offering support to vulnerable groups in targeted areas of the borough, including boys and those eligible for the PPG (pupil premium grant).
- 2. Support the creation of jobs that enhance quality of life particularly targeting those underrepresented in the employment sector identified as BAME, women, young people, lone parents and people with disabilities.
- 3. Services are proactive in targeting groups that have accessibility issues as a result of disability, age, mental health, language, digital and/ or physical barriers.
- 4. Inequalities that lead to school exclusions and young people entering the criminal justice system are addressed, specifically for black boys, white working class boys, gypsy roma and travellers, and those accessing free school meals.

The council is aware there is still some distance to go to eliminate discrimination and reduce inequalities. It faces challenges around deprivation and inequalities in a range of domains relating to income health, education and housing.

Research has found that inequality can develop as a consequence of inter-generational disadvantage starting in early childhood and reoccurring throughout life. We know it is a set of complex needs that put children at a greater risk of repeating a cycle of exclusion experienced by their parents. Inadequate housing, poor diet, lack of access to decent open spaces and many other factors can compound disadvantage for children from less well-off backgrounds.

Croydon also has the largest number of looked after children of any borough in London, many of whom require intensive support.

In common with much of the country, local child and adolescent mental health services are struggling to keep up with demand, often resulting in critical time being lost before diagnosis of developmental or mental health disorders. We want the local health service to work with the council and schools to look at new models that do more to bring services into schools and to work with families much earlier when there are problems.

As set out in the statistics section, there are significant inequalities in educational achievement in Croydon. The early years challenge is the most profound for the borough as a whole and particularly for children from less well-off backgrounds but there are also individual schools in parts of the borough that don't do well enough.

We will work in partnership with all Croydon schools, settings and partners to share best practice and deliver the very best for all our young people and ensure resources are targeted at and focus is on those groups that currently under-perform.

Like England as a whole, Black Caribbean pupils in Croydon have the greatest level of disproportionately when it comes to exclusion from school. The Council will continue to

What actions will we take?

1. Analyse the achievement of specific pupil groups and address where we have gaps in outcomes
2. Sign post to information available on education opportunities, qualifications and careers guidance including basic English skills, post-16 provision and financial management
3. Share best practice and learn from our partners via Pupil Premium Network etc. to include best practice on wellbeing and emotional needs support
4. Ensure economic recovery plan includes the needs of protected groups
5. Continue to engage with local employers and increase the number and range of apprenticeships, pay the London Living Wage and provide exposure to different work environments
6. Raise awareness of our partner support services for e.g. translation service, language, Braille, easy read and digital support and hearing impaired
7. Data collected by services about accessibility informs equality analyses
8. Design our services around the needs of our residents by using user research and user testing as the basis of all service improvements.
9. Council and health service work with schools to regularly evaluate mental wellbeing, pastoral and therapeutic

work with schools, local health services, and the community to reduce the need to exclude pupils.

In recent years, we have seen an increase low-paid and unskilled work including part-time, short term contracts, self-employment and insecure employment nationally and locally. The number of zero hour contracts has significantly increased since 2010. Real pay is still below 2010 levels and there has been an increase in the proportion of people in poverty living in a working household. Minority ethnic groups, women, lone parents, and people with disabilities have higher unemployment rates.

Wage growth has been low since 2010 and wage inequality persists - particularly for children and for those in work. Lone parents with children have the highest risk of being in persistent poverty. The number of families with children who do not reach the minimum income standard has increased.

The coronavirus pandemic has put additional pressures on local communities emphasising the inequalities that were already present, reducing the opportunities for those leaving education, and increasing the numbers of people unable to access paid employment. Vulnerable people such as the long-term unemployed, disabled people and those with low levels of literacy are most likely to be left behind as people with established work skills and experience re-enter the employment market. Some of the most disadvantaged people often lack basic information and skills.

The Council will work with its partners including developers to continue to create fair employment and good work for all and in particular those furthest away from the job market as we work towards building an inclusive economy. We will also continue to work with the education sector and other partner organisations' to increase the number of people with the skills needed to contribute to our local digital economy.

The Council's award winning apprenticeship programme currently works with providers to support business in developing training programmes for current and new employees and in creating new apprenticeships and employment pathways for Croydon residents.

support in schools and their links to support networks outside schools.

10. Monitor exclusion rates and take actions to address over-representation

What will success look like?

1. Close outcome gap for groups identified as underachieving especially at levels 2,4,5
2. Increase in % of residents from protected groups and disadvantaged areas gaining qualifications (inc English) and training opportunities via CALAT
3. Narrow number of 16-24 year olds not in employment, training or education
4. Increase of number of local employers providing and supporting apprenticeships, work placements and paying the London living wage
5. Good Work Standard rolled out in Croydon
6. Increase in satisfaction of and access to services by groups that share protected characteristics
7. Reduction in fixed and permanent exclusion rates for all vulnerable groups – including autism and behavioural challenges

The Council plans to roll out the Good Works Standard that will provides employers with a set of best employment practices and will continue to support new & emerging entrepreneurs from disadvantaged communities.

Food insecurity has increased significantly. The growth of food banks – with at least nine now running across the borough – is symptomatic of the poverty some residents face, with new migrants, young people without work, training or financial support from their family, those with mental health conditions, those on low wages and sanctioned benefit claimants among the poorest and most marginalised in the community.

Nearly half of those in poverty in the UK in 2018 - 6.9 million people - were from families in which someone had a disability. Some ethnic groups face much higher rates of poverty than others, particularly those who are Black, Bangladeshi, Pakistani origin where rates of poverty after housing are as high as 50%.

The most common cause of homelessness is now the inability of some families to be able to find affordable homes in the private rented sector or to stay in them. For those with low and erratic incomes and /or debts, paying regular monthly rent or managing to scrape together a deposit – now typically equivalent to two months of rent – are challenges that too often prove insurmountable.

The number of non-decent houses has decreased, including in the private rented sector, but this sector also has nationally high levels of cold, damp, and poor conditions including insecure tenures. Homelessness has increased significantly including more children in homeless families living in temporary accommodation with an impact on both mental and physical ill health.

Croydon has a Good Agent and Landlord Charter focused on the parts of the private rental sector which can help most to prevent homelessness by taking tenants on benefit, with pursuit of best practice including early advice on arrears and money wise courses made available, as well as support for disabled tenants.

Two thirds of those accepted as homeless in Croydon are families with children and the consequences of becoming homeless include potentially serious impacts on a child's

education, including on attainment and behaviour, as well as on mental and physical wellbeing. The scars this leaves last into adulthood.

We know how important it is to stem the rising tide of homelessness in the borough and by working together the council and community can achieve much more

The Council will take steps to ensure access to and appropriateness of services is monitored regularly. We will work towards supporting access to translation is easy, available and utilised and accommodate the needs of sight and hearing impaired staff and members of the public.

We will continue to design services that best meet the needs of citizens, where technology is an enabler rather than a barrier to service improvements, and services are a delight for citizens and officials to use. This means prioritising citizen and user needs by using user research and user testing as the basis of all service improvements. This will include mapping of and satisfaction data collected broken down by equality groups and vulnerable communities in order to better understand key gaps in provision around accessibility. This information will be analysed, acted upon by services and used to inform equality impact assessments.

OUTCOME FOUR: People in Croydon are supported to be in good health

What do we want to achieve?

- 1. Work with partners to further tackle social isolation and bring people together
- 2. With our partners use our knowledge of specific health challenges to support improvements
- 3. We work with our partners to open the door to health services, and support them to make sure residents know where and how to access services

What actions will we take?

- 1. Work with VCS partners to increase the number of volunteers addressing social isolation and support families in the community
- 2. Encourage Council staff to use their volunteer days to mentor young people or befriend older people
- 3. Work with health partners to collect and report against key protected characteristics for access, processes and outcome

Health inequality speaks about differential and avoidable differences in health and well-being outcomes amongst people who are otherwise equal.

The King's Fund (February 2020) describe health inequalities as including differences in:

- 1. health status, for example, life expectancy and prevalence of health conditions
- 2. access to care, for example, availability of treatments
- 3. quality and experience of care, for example, levels of patient satisfaction
- 4. behavioural risks to health, for example, smoking rates
- 5. wider determinants of health, for example, quality of housing.

'Inequalities in health arise because of inequalities in society – in the conditions in which people are born, grow, live, work and age. The magnitude of health inequalities is a good marker of progress towards creating a fairer society. Taking action to reduce inequalities in health does not require a separate health agenda, but action across the whole of society'

In 2010 the Marmot Review demonstrated the scale that health inequalities continued to exist, and again showed a clear social gradient in health – 'the lower a person's social position, the worse his or her health'. Fast forward ten years to February 2020, The Health Foundation published Health Equity in England: The Marmot Review 10 Years On. This report showed that despite increased knowledge and awareness of health inequalities life expectancy in England has stalled, years in ill health have increased and inequalities in health have widened.

Public Health England released a review of the disparities in risk and outcomes of COVID-19 in June 2020, with a follow up paper on understanding the impact of COVID-19 on BAME Communities which contained recommendations for action. Harms caused by COVID-19 has replicated existing health inequalities, and in some cases increased them. The largest disparity found was age, but the risk of dying among those diagnosed with COVID-19 was also higher in males, than females; higher in those living in the more

- 4. Develop an autism strategy to raise awareness of autism and key challenges in the Borough

What will success look like?

- 1. Reduce % of Croydon service users who state they feel socially isolated – in particular people with learning disabilities or in need of physical or sensory support, 65+
- 2. Increase awareness of staff volunteering and number of hours given
- 3. Increase in number of young people engaging in activities
- 4. Autism Strategy developed
- 5. Increase in number of residents who state their health and wellbeing has increased as a result of contacting services
- 6. Increase in number of residents reporting that they have an increase in social connections
- 7. Health partners collect and reporting against key protected characteristics for access, processes and outcome

deprived areas than those living in the least deprived; and higher in those in Black, Asian and Minority Ethnic (BAME) groups than in White ethnic groups. Ongoing effects of the economic impact of COVID related restrictions are also widening inequalities e.g. by disproportionately affecting workers who are female, young and low-paid.

The approach for improving health inequalities will capitalise on prevention, health promotion and self-care utilising the One Croydon preventative framework tool. It will reflect a commitment to the people of Croydon to start well, live well and age well.

The Croydon Health and Wellbeing Board already has reducing health inequalities at its heart as an overarching theme for the Croydon Health and Wellbeing Strategy, and in its delivery through the Health and Care Plan. The Croydon Prevention Framework is being developed to create the conditions for which prevention initiatives will flourish and support One Croydon's aim to reduce inequalities. Equality, Diversity and Inclusion is the South West London ICS 20/21 key ambition.

The council will work with its partners to ensure they embed behaviours, systems, practices and processes that allow a sustainable focus on reducing inequalities and fosters culturally aware organisations by default. As such we will support partners to ensure data about local communities is more effectively collected, analysed and more readily available to be used to inform decisions and improve services. Equality analysis can be used to identify needs and improve outcomes, address gaps and reduce inequality.

There are multiple and complex risk factors that can influence social isolation and loneliness. These range from level of education, employment status, wealth, income, housing, crime, ethnicity, gender, disability, age and mental health. These risks factors are more likely to affect some groups, such as people with mental health problems, people with dementia, refugees and asylum seekers and so on. Taking on full time unpaid caring duties can also lead to being more isolated. Caring duties are more likely to be performed by women and some women in their middle age end up caring for both a sick parent and child at the same time. It is therefore fundamental to take action at different levels and address all wider determinants to prevent and reduce social isolation and loneliness.

Social isolation and loneliness have significant equalities and human rights dimensions. They disproportionately affect groups that share protected characteristics and can compound discrimination and disadvantage experienced by those groups.

At a time when council budgets are under significant pressure it is particularly important that the council continues to work with the voluntary sector and recognise the untapped possibilities within every community. We will continue to encourage Council staff to volunteer on social priorities within Croydon. The Council will also continue to support residents with the confidence and access to use the internet, thereby improving social inclusion

We will also work in partnership with the Clinical Commissioning Group and GP practices to support outreach services, work within communities to signpost socially isolated people to services and promote online and offline directories of services.

This can have a positive impact on mental health and social isolation and reduce the use of costly statutory services

ACTION PLAN AND PERFORMANCE MEASURES

The Council addresses social inequities as an employer and a community leader

Action	Lead Officer	Identified Groups	Year 1	Year 2	Year 3	Year 4
<p>The Council Works to reflect our diverse communities at all levels</p>	<p>Director of Human Resources Head of Learning & Organisational Development HR Recruitment & Process Manager</p>	<p>BAME Disability Gender</p>	<ul style="list-style-type: none"> • All recruitment panels are diverse • Anonymised shortlisting across all recruitment • Workforce profile (grade 14 and above representative of local community at all levels) • Baseline number of protected characteristics of participation on leadership programmes • Measure disability and ethnicity pay gaps • Improve equality disclosure 	<ul style="list-style-type: none"> • Spot checks from application to appointment for underrepresented groups • Workforce profile (grade 14 and above representative of local community at all levels) • Increase participation on leadership programmes from all under-represented protected characteristics • Improve gender, disability and BME pay gaps • Improve equality disclosure 	<ul style="list-style-type: none"> • Workforce profile (grade 14 and above representative of local community at all levels) • Improve gender, disability and BME pay gaps • Improve equality disclosure 	<ul style="list-style-type: none"> • Improve equality disclosure
<p>The Council acts a role model and champions a fairer society</p>	<p>All services Equalities Manager</p>	<p>All</p>	<ul style="list-style-type: none"> • Equality data is collected by all services • Every key decision must be accompanied by an EIA • Every strategy, appraisal, delivery 	<ul style="list-style-type: none"> • Pulse check for satisfaction – ‘how satisfied or dissatisfied are you that the council as your employers listens and acts on your feedback’ annually • EIAs are data driven 	<ul style="list-style-type: none"> • Pulse check for satisfaction – ‘how satisfied or dissatisfied are you that the council as your employers listens and acts on your feedback’ annually • EFLG excellent review 	<ul style="list-style-type: none"> • Pulse check for satisfaction – ‘how satisfied or dissatisfied are you that the council as your employers listens and acts on your feedback’ annually • EFLG excellent review

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 24</p>			<p>plan and Council contract will have an equality objective</p> <ul style="list-style-type: none"> Once a year scrutiny considers EIA Incorporate satisfaction – ‘how satisfied or dissatisfied are you that the council as your employers listens and acts on your feedback’ in future surveys Council contractors are inclusive and supportive of vulnerable groups and groups that share protected characteristics 	<ul style="list-style-type: none"> Once a year scrutiny will consider EIA Every key decision must be accompanied by an EIA Every strategy, appraisal and delivery plan will have an equality objective Council contractors are inclusive and supportive of vulnerable groups and groups that share protected characteristics 	<ul style="list-style-type: none"> EIA demonstrates evidence and impact (where change has been made in relation to the EIA) Once a year scrutiny will consider EIA Every strategy, appraisal, delivery plan and Council contracts will have an equality objective Council contractors are inclusive and supportive of vulnerable groups and groups that share protected characteristics 	<ul style="list-style-type: none"> EIA demonstrates evidence and impact (where change has been made in relation to the EIA) Every strategy, appraisals and delivery plan will have an equality objective Council contractors are inclusive and supportive of vulnerable groups and groups that share protected characteristics
<p>Action</p>	<p>Lead Officer</p>	<p>Identified Groups</p>	<p>Year 1</p>	<p>Year 2</p>	<p>Year 3</p>	<p>Year 4</p>
<p>The Council ensures equality training is central to the way we work, is regularly undertaken and is reviewed to meet changing needs</p>	<p>Director HR Head of Learning & Organisational Development Head of Democ</p>	<p>All</p>	<ul style="list-style-type: none"> 100% of new starters complete the Equality essentials and Unconscious Bias training and this is measured Equality training available is reviewed every two years 100% of Cllrs complete the Equality essentials and Unconscious Bias training within lifespan of election and this is measured 	<ul style="list-style-type: none"> 100% of new starters complete the Equality essentials and Unconscious Bias training Equality training available is reviewed every two years 100% of Cllrs complete the Equality essentials and unconscious bias training within lifespan of election 	<ul style="list-style-type: none"> 100% of new starters complete the Equality essentials and Unconscious Bias training Equality training available is reviewed every two years 100% of Cllrs complete the Equality essentials and unconscious bias training within lifespan of election 	<ul style="list-style-type: none"> 100% of new starters complete the Equality essentials and Unconscious Bias training Equality training available is reviewed every two years 100% of Cllrs complete the Equality essentials training and unconscious bias training within lifespan of election

	atic services & Scrutiny					
Continue to increase our network across seldom heard groups as identified	All services	LGBT+; Asylum seekers & women	<ul style="list-style-type: none"> • Capture baseline data of who is engaging with us to identify gaps and who the next cohort is. • Ensure service user surveys contain ‘‘how satisfied or dissatisfied are you that the council listens and acts on your feedback’ 	<ul style="list-style-type: none"> • Capture baseline data of who is engaging with us to identify gaps and who the next cohort is. • Ensure service user surveys contain ‘‘how satisfied or dissatisfied are you that the council listens and acts on your feedback’ • Baseline satisfaction levels and set incremental target for improvement - how satisfied or dissatisfied are you that the council listens and acts on your feedback’ • Evidence response to feedback ‘you said, we did’ 	<ul style="list-style-type: none"> • Capture baseline data of who is engaging with us to identify gaps and who the next cohort is. • Ensure service user surveys contain ‘‘how satisfied or dissatisfied are you that the council listens and acts on your feedback’ • Evidence response to feedback ‘you said, we did’ 	<ul style="list-style-type: none"> • Capture baseline data of who is engaging with us to identify gaps and who the next cohort is. • Ensure service user surveys contain ‘‘how satisfied or dissatisfied are you that the council listens and acts on your feedback’ • Evidence response to feedback ‘you said, we did’
Action	Lead Officer	Identified Groups	Year 1	Year 2	Year 3	Year 4
Information about the Council’s work towards tackling inequity is easy to access and understand	Chief Digital Officer Head of Comms & Engagement Equalities Manager	All	<ul style="list-style-type: none"> • Develop annual Equalities communications plan • Incorporate equality in communications forward plan 	<ul style="list-style-type: none"> • Review annual communications plan for Equalities 	<ul style="list-style-type: none"> • Review annual communications plan for Equalities 	<ul style="list-style-type: none"> • Review annual communications plan for Equalities

<p>Data about local communities is more effectively collected, analysed and used to inform decisions and improved services</p>	<p>All services</p> <p>Head of Business Intelligence, Performance and Improvement</p> <p>Equalities Manager</p>	<p>All</p>	<ul style="list-style-type: none"> • Agree Croydon standard for equality data collection 	<ul style="list-style-type: none"> • Standardised equality data is captured by services • Equality data is updated, shared, analysed and used to make decisions • Routinely publish equality data on Croydon Observatory 	<ul style="list-style-type: none"> • Standardised equality data is captured by services • Equality data is updated, shared, analysed and used to make decisions 	<ul style="list-style-type: none"> • Standardised equality data is captured by services • Equality data is updated, shared, analysed and used to make decisions
<p>Action</p>	<p>Lead Officer</p>	<p>Identified Groups</p>	<p>Year 1</p>	<p>Year 2</p>	<p>Year 3</p>	<p>Year 4</p>
<p>Enable better education outcomes by offering support to underachieving groups including white working class boys, black boys and those eligible for the PPG (Pupil Premium Grant)</p>	<p>Director of Education</p> <p>Head of Employment and Skills Delivery</p>	<p>SEN</p> <p>Disability</p> <p>Vulnerable groups</p> <p>White working class boys</p> <p>Black boys</p> <p>PPG</p>	<ul style="list-style-type: none"> • % learner qualification/achievement † CALAT (broken down by protected characteristics) • % trained through CALAT to achieve positive higher education which is (broken down by protected characteristics) • % annual achievement black Caribbean children, children receiving free school meals, looked after children • % of residents supported to learn English by CALAT 	<ul style="list-style-type: none"> • Close outcome gap groups identified as underachieving • % learner qualification/achievement CALAT (broken down by protected characteristics) • % trained through CALAT to achieve positive higher education (broken down by protected characteristics) • Ensure apprenticeships data is collected annually (broken down by protected characteristics) 	<ul style="list-style-type: none"> • Close achievement gap at levels 2,4,5 • Close achievement gap of at levels 2,3 qualification by age 19 <ul style="list-style-type: none"> - GCSE levels 9 – 1 at Level 2 - A Levels A*-G at post 16 - Technical/Vocational : BTEC/ Pass/ Merit/ Distinction at Level 2 As above for Level 3 • % learner qualification/achievement † CALAT (broken down by protected characteristics) 	<ul style="list-style-type: none"> • % learner qualification/achievement CALAT (broken down by protected characteristics) • % trained through CALAT to achieve positive higher education (broken down by protected characteristics)

		FSM	<ul style="list-style-type: none"> Ensure apprenticeships data broken down by protected characteristics is collected annually 		<ul style="list-style-type: none"> % trained through CALAT to achieve positive higher education (broken down by protected characteristics) Ensure apprenticeships data is collected annually (broken down by protected characteristics) 	
Support the creation of jobs that enhance quality of life particularly targeting BAME, women, young people, lone parents and people with disabilities	Director - Growth Employment and Regeneration Head of Economic Development	BAME Women Young people Lone parents People with disabilities	<ul style="list-style-type: none"> Broker job placements for 16-24 year olds on Universal Credit data ERP includes the needs of protected groups Continue to engage with local employers to increase number and range of apprenticeships and work placements – pay the London living wage – provide exposure to different work environments – broken down by protected characteristics Good Works Standard – Croydon chapter created 	<ul style="list-style-type: none"> Broker job placements for 16-24 year olds on Universal Credit data Continue to engage with local employers to increase number and range of apprenticeships and work placements – pay the London living wage – provide exposure to different work environments broken down by protected characteristics Collect equality data on the work placement forms Good Works Standard – Croydon chapter sustained and membership expanded 	<ul style="list-style-type: none"> Broker job placements for 16-24 year olds on Universal Credit data Continue to engage with local employers to increase number and range of apprenticeships and work placements – pay the London living wage – provide exposure to different work environments Collect equality data on the work placement forms Good Works Standard – Croydon chapter sustained and membership expanded 	<ul style="list-style-type: none"> Continue to engage with local employers to increase number and range of apprenticeships and work placements – pay the London living wage – provide exposure to different work environments Collect equality data on the work placement forms
Action	Lead Officer	Identified Groups	Year 1	Year 2	Year 3	Year 4
Services are proactive in targeting groups that have accessibility issues as result	All Services	Disability Autism Race	<ul style="list-style-type: none"> % of residents supported to learn English by CALAT Satisfaction of services broken down by characteristics monitored by STAR survey 	<ul style="list-style-type: none"> % of residents supported to learn English by CALAT Satisfaction of services broken down by characteristics monitored by STAR survey 	<ul style="list-style-type: none"> % of residents supported to learn English by CALAT Services assessments, user research and user testing as the basis of all service improvements. 	<ul style="list-style-type: none"> % of residents supported to learn English by CALAT Services assessments, user research and user testing as the basis of all service improvements.

Appendix 6

<p>of disability, age mental health, language, digital and/or physical barriers</p>		<p>Mental Health</p>	<ul style="list-style-type: none"> • Services assessments, user research and user testing as the basis of all service improvements. • % of residents stating 'feel my health and wellbeing will benefit as a result of my contact with this service' - broken down by characteristics • Co-produce services with residents wherever possible 	<ul style="list-style-type: none"> • Services assessments, user research and user testing as the basis of all service improvements. • % of residents stating 'feel my health and wellbeing will benefit as a result of my contact with this service' - broken down by characteristics (One Croydon Health and Care Plan) • Co-produce services with residents wherever possible 	<ul style="list-style-type: none"> • % of residents stating 'feel my health and wellbeing will benefit as a result of my contact with this service' - broken down by characteristics • Co-produce services with residents wherever possible 	<ul style="list-style-type: none"> • % of residents stating 'feel my health and wellbeing will benefit as a result of my contact with this service' - broken down by characteristics • Co-produce services with residents wherever possible
<p>Inequalities that lead to school exclusions and young people entering the criminal justice system are addressed, specifically for black boys, gypsy roma & travellers and those accessing free meals</p>	<p>Director of Early Help and Children's Social Care Director Violence Reduction Unit Head of Youth Offending Service</p>	<p>Black boys Gypsy Roma & travellers FSM</p>	<ul style="list-style-type: none"> • Reduce number of fixed and permanent exclusion rates for all vulnerable groups – including autism and behavioural challenges • Proportion of BAME young people listed in youth justice disposals 	<ul style="list-style-type: none"> • Proportion of BAME young people listed in youth justice disposals • % of young people who feel they are listened to including looked after children and young carers (annually) 	<ul style="list-style-type: none"> • % of young people who feel they are listened to including looked after children and young carers 	<ul style="list-style-type: none"> • % of young people who feel they are listened to including looked after children and young carers (annually)
<p>Work with partners to</p>	<p>Families health</p>	<p>Age Disability</p>	<ul style="list-style-type: none"> • Benchmark % of Croydon service users who state 	<ul style="list-style-type: none"> • Benchmark % of Croydon service users who state they 	<ul style="list-style-type: none"> • Benchmark % of Croydon service users who state 	<ul style="list-style-type: none"> •

<p>further tackle social isolation and bring people together</p>	<p>and social care Youth engagement team</p>		<p>they feel socially isolated – people with learning disabilities or in need of physical or sensory support, 65+ (annually)</p> <ul style="list-style-type: none"> • Capture all staff volunteer hours • Total number of people actively participating in staff mentoring scheme – broken down by protected characteristics • Number of young people engaging in activities delivered by Youth engagement team • Increase in number of residents reporting that they have an increase is social connections – broken down by protected characteristics 	<p>feel socially isolated – people with learning disabilities or in need of physical or sensory support, 65+ (annually)</p> <ul style="list-style-type: none"> • Total number of people actively participating in mentoring scheme – broken down by protected characteristics • Capture all staff volunteer hours • Number of young people engaging in activities delivered by Youth engagement team • Increase in number of residents reporting that they have an increase is social connections –broken down by protected characteristics 	<p>they feel socially isolated – people with learning disabilities or in need of physical or sensory support, 65+ (annually)</p> <ul style="list-style-type: none"> • Capture all staff volunteer hours • Number of young people engaging in activities delivered by Youth engagement team • Increase in number of residents reporting that they have an increase is social connections – broken down by protected characteristics 	
Action	Lead Officer	Identified Groups	Year 1	Year 2	Year 3	Year 4
<p>With our partners use our knowledge of specific health challenges to support improvements</p>	<p>Director Public Health Director One Croydon Family health and social care</p>	<p>All</p>	<ul style="list-style-type: none"> • Agree a standard of equality data to be collected by health services • Look at early interventions across organisations to prevent greater support needs later in childhood particularly for particular groups such as autistic • Listen to protected groups and particularly seldom heard groups such as autistic people and their views when we 	<ul style="list-style-type: none"> • Capture agreed data by health services • Look at early interventions across organisations to prevent greater support needs later in childhood particularly for particular groups such as autistic • Listen to protected groups and particularly seldom heard groups such as autistic people and their views when we commission and develop health services 	<ul style="list-style-type: none"> • Capture agreed data by health services • Look at early interventions across organisations to prevent greater support needs later in childhood particularly for particular groups such as autistic • Listen to protected groups and particularly seldom heard groups such as autistic people and their views when we commission and develop health services 	<ul style="list-style-type: none"> • Capture agreed data by health services • Look at early interventions across organisations to prevent greater support needs later in childhood particularly for particular groups such as autistic • Listen to protected groups and particularly seldom heard groups such as autistic people and their views when we commission and develop health services

<p>We open doors to health services through our partners to make sure residents know where and how to access services</p>	<p>Director Public Health</p>	<p>All</p>	<p>commission and develop health services</p> <ul style="list-style-type: none"> • Raise awareness around prevention and signpost where and how residents can receive support • % of Croydon service users who state they feel socially isolated – in particular people with learning disabilities or in need of physical or sensory support, 65+ • Working in partnership to support those most vulnerable • Increase in number of young people engaging in activities from underrepresented groups • Increase in number of residents who state their health and wellbeing has increased as a result of contacting services 	<ul style="list-style-type: none"> • Raise awareness around prevention and Signpost where and how residents can receive support • Working in partnership to support those most vulnerable • % of Croydon service users who state they feel socially isolated – in particular people with learning disabilities or in need of physical or sensory support, 65+ • Increase in number of young people engaging in activities from underrepresented groups • Increase in number of residents who state their health and wellbeing has increased as a result of contacting services 	<ul style="list-style-type: none"> • Raise awareness around prevention and Signpost where and how residents can receive support • Working in partnership to support those most vulnerable • % of Croydon service users who state they feel socially isolated – in particular people with learning disabilities or in need of physical or sensory support, 65+ • Increase in number of young people engaging in activities from underrepresented groups • Increase in number of residents who state their health and wellbeing has increased as a result of contacting services 	<ul style="list-style-type: none"> • Raise awareness around prevention and Signpost where and how residents can receive support • Working in partnership to support those most
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Glossary

Ally

A (typically) straight and/or cis person who supports members of the LGBT community

BAME

Black and Minority Ethnic

Cisgender or cis

Someone whose gender identity is the same as the sex they were assigned at birth. Non-trans is also used by some people

Discrimination and Harassment

Discrimination is when you are treated differently (for example less favourably) because of your gender, race or disability.

Harassment is any form of unwanted and unwelcome behaviour which may range from mildly unpleasant remarks to physical violence.

Diverse or diversity this is a mix of different kinds of people. For example, men and women, young and old people, people of different races, disabled and non-disabled people.

Duties these are things the law says a public body must do.

Equality this means everyone having the same chances to do what they can. Some people may need extra help to get the same chances.

Equity this means being fair and impartial as an individual engages with an organization or system, particularly systems of grievance

Equality Duty

This is a law for public bodies telling them they must think about how they can make sure their work supports equality. For example, in their services, through their jobs, and through the money they spend.

Public bodies already needed to think about treating people of different races, disabled people, and men and women fairly and equally.

Gender reassignment

The process of changing or transitioning from one gender to another

GLD the Good Level of Development (GLD) measure is the most widely used single measure of child development in the early years. It is a measure of attainment, not progress.

Inequity this means lack of fairness and/or justice

Inclusion the practice or policy of providing equal access to opportunities and resources for people who might otherwise be excluded or marginalized, such as those who have physical or mental disabilities and members of other minority groups.

IMD Indices of multiple deprivation are widely-used datasets within the UK to classify the relative deprivation of small areas. Multiple components of deprivation are weighted with different strengths and compiled into a single score of deprivation

LGBT (lesbian, gay, bi, trans)

Lesbian - Refers to a woman who has a romantic and/or sexual orientation towards women. Some non-binary people may also identify with this term.

Gay - Refers to a man who has a romantic and/or sexual orientation towards men. Also a generic term for lesbian and gay sexuality - some women define themselves as gay rather than lesbian. Some non-binary people may also identify with this term.

Bi - Bi is an umbrella term used to describe a romantic and/or sexual orientation towards more than one gender.

Bi people may describe themselves using one or more of a wide variety of terms, including, but not limited to, bisexual, pan, queer, and some other non-monosexual and non-monoromantic identities.

Trans - An umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

Trans people may describe themselves using one or more of a wide variety of terms, including (but not limited to) transgender, transsexual, gender-queer (GQ), gender-fluid, non-binary, gender-variant, crossdresser, genderless, a gender, nongender, third gender, bi-gender, trans man, trans woman, trans masculine, trans feminine and neutrois.

LSoAs

A Lower Super output Area typically contains around 1,500 residents. Super output areas produce a set of areas of consistent size, whose boundaries would not change (unlike electoral wards), suitable for the publication of data such as the Indices of Deprivation.

Marriage and civil partnership

Marriage and Civil Partnership means someone who is legally married or in a civil partnership. Marriage can either be between a man and a woman, or between partners of the same sex. Civil partnership is between a man and a woman, or of partners of the same sex

Pregnancy and maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Protected characteristics these are the grounds upon which discrimination is unlawful. The characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Public bodies

Public bodies include government departments, schools, hospitals and councils.

Staff these are people or companies that pay people to do work.

Vulnerability

A combined range of factors could make people more vulnerable or place them in situations that lead to greater vulnerability. For example some people are vulnerable due to a particular condition such as mental or physical illness as well find themselves placed in vulnerable situations such as living in a poor area with a lack of access to jobs, healthcare or housing. It is a combination of social and economic factors that place them at a disadvantage.

For General Release

REPORT TO:	Cabinet 18 February 2021
SUBJECT:	Education Quality and Standards
LEAD OFFICER:	Debbie Jones – Interim Executive Director, Children, Families and Education Shelley Davies – Interim Director, Education and Youth Engagement
CABINET MEMBER:	Councillor Alisa Flemming, Cabinet Member for Children, Young People and Learning
WARDS:	All
CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON	
<p>The recommendations in this report are in line with the new corporate priorities and new Ways for renewing Croydon:</p> <ul style="list-style-type: none"> - We will live within our means, balance the books and provide value for money for our residents. - We will focus on tackling ingrained inequality and poverty in the borough. - We will focus on providing the best quality core service we can afford. 	
FINANCIAL IMPACT	
There are no financial considerations with this report.	
FORWARD PLAN KEY DECISION REFERENCE NO.: This is not a key executive decision.	
The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below	
1. RECOMMENDATIONS	
<p>The Cabinet is recommended to note the contents of the report and to recognise the work of staff in schools to support Croydon’s children and young people.</p>	

2. EXECUTIVE SUMMARY

- 2.1 This report summarises the performance of children and young people in Croydon schools for the academic year 2019/2020. The academic year 2019/2020 was unprecedented in education, and the whole country, with regard to the Covid-19

pandemic. The Department for Education (DfE) took the decision to progress with Centre Assessed Grades for pupil performance at Key Stages 4 and 5 (GCSE and A level equivalents). Statutory assessment for primary schools (EYFS profile, phonics screening check and KS1 and 2 tests and teacher assessments were cancelled in 2019-20). Performance data will not be published by the DfE and schools/ academies were not obliged to share their outcomes. This report, therefore, does not cover pupil performance for the academic year.

Borough Context

- 2.2 Previous reports to this Committee that detail the work the Directorate undertook to support schools and academies through the 'walking alongside agenda' are not reported here. These reports are part of the public record and can be read in conjunction with this report.

Summary of outcomes:

- 2.3 Progress data for the close of the academic year 2020 was based on teacher assessment as per instruction from the DfE. No progress data is being published by the DfE and no 2020 progress data is being included as part of OFSTED inspection reports. To that end, no achievement data for 2019-2020 is recorded in this report.
- 2.4 Although statutory assessments in primary schools (EYFS, Key Stage One and Key Stage Two) were cancelled for the academic year 2019-20, following the full opening of schools in September 2020, the government took the decision that primary schools should administer the phonics screening check (PSC) to all Year 2 pupils after the Autumn term half term; this being the cohort who should have taken the check as Year 1 pupils in June 2020. It should be noted that the administration of the check in Autumn 2020 differed to the normal requirements e.g. schools were asked to use previous versions of check materials and not new materials that were unfamiliar to schools. It is important to note that the results should not be used for accountability purposes but were intended to provide the DfE with information about the proportion of pupils that had not met the required standard. The emphasis on the phonics screening check aligns with governmental and local recognition of the importance of early reading skills.
- 2.5 The interim results of the Year 2 Autumn term PSC need to be approached with caution due to challenges relating to the pandemic e.g. the impact of partial school closure from March to July as well as COVID related pupil absences during the Autumn term and Year 2 bubble closures in the second half of the autumn term. It is currently unvalidated data. With these caveats in mind, it can be noted that the interim results indicate that 80% of Year 2 pupils achieved the PSC threshold in Autumn term 2020. These results are lower than Year 1 results in 2019 for Croydon (84%) and nationally (82%) but above the national results for Autumn term 2020 (79%). There is a significant gap in Croydon between the attainment of pupils in receipt of free school meals and other pupils (-10%) but this gap is narrower than at a national level (18%). There has already been a strong focus in schools on providing catch-up support for early reading skills and this remains a continuing priority.

3. 0 – 19 Provision

3.1 Early Years

Areas for development and what are we doing to address them in the EYFS?

1. To reduce the attainment gap between the average and lowest pupils in language and literacy
2. Further narrow the gap between children eligible for FSM and those not eligible
3. Ensure the Integrated 2 Year Old Review is fully embedded across the Borough
4. To improve the health of the under 5s by reducing the number of children at age 5 classed as 'overweight' or 'obese'

- 3.2 This academic year (2020/21) will see major changes in the EYFS. The Government has introduced a new Statutory Framework with changes to the Educational Programmes, the Early Learning Goals and the assessment of pupils at the end of their reception year (the EYFS Profile). Schools were invited to become early adopters of the new framework, from September 2020, and 12 Croydon schools have done so (Nationally, 2,900 schools are early adopters). All schools and early years settings will be required to use the new Framework from September 2021. One of the changes is the removal of the LA statutory duty to moderate the EYFS Profile from September 2021. The LA statutory duty to offer training and support for the Profile, for all practitioners who require it, remains.
- 3.3 Whilst, in recent years, Croydon's GLD (Good Level of Development) has been above the national, it has remained stubbornly lower in all aspects of language development, particularly in the aspect of 'speaking'. To address this, the LA is part funding a 3 year project to develop and embed the use of 'Helicopter Stories' in our early years settings and schools. This evidence based approach to developing language and literacy skills will be led by Make Believe Arts with funding from the Paul Hamlyn Trust.
- 3.4 Due to the pandemic, the 2 year old integrated reviews between setting and health practitioners have not progressed as intended. This is a development for the forthcoming year.
- 3.5 The Early Years team is also working with health colleagues to support weight management for our youngest children in Croydon.

Inspection Outcomes for Early Years:

- 3.6 The Best Start Early Years team closely monitor inspection judgements for all day nurseries, pre-schools and childminders so that there is a clear understanding about the quality of these settings.

Quality of childcare in Croydon

3.7 Ofsted inspect all registered Early Years provision and the table below shows the quality judgements recorded as at August 2020 and published in the 2020 Childcare Sufficiency Assessment for Croydon.

	Outstanding		Good		Sub-total	Requires Improvement		Inadequate		Awaiting	
Day nurseries	10	12%	74	87%	99%	0	0%	1	1%	22	n/a
Pre-school	7	18%	31	82%	100%	0	0%	0	0%	8	n/a
Schools with nursery	12	26%	30	66%	92%	4	8%	0	0%	11	n/a
Childminders	32	12%	226	79%	91%	4	1%	22	8%	85	n/a
Out of School	9	19%	37	76%	95%	2	3%	1	2%	21	n/a
Holiday Play schemes	1	7%	11	79%	85%	0	0%	2	14%	5	n/a

3.8 Ofsted's data as at 31.8.20 show that the proportion of Croydon childcare providers on the Early Years Register judged to be good or outstanding was 95%. This is in line with the London average of 95% and slightly below the national average of 96%.

3.9 The Best Start Learning Collaboration, commissioned by the Local Authority, provides pedagogical leadership and encourages peer-to-peer support and self-reflective practice for staff in the full range of Early Years settings. The Collaboration has supported settings to remain open during lockdown and to open more widely from June 2020. The Collaboration is offering a full range of training via Zoom to ensure continuing high quality provision for the youngest children.

3.10 Areas for development and what are we doing to address them at KS1 and KS2?

1. Close the gap in outcomes between our highest and lowest performing schools
2. Work closely to support and challenge our schools that are not yet good
3. Improve outcomes for boys at key stage 2
4. Close the gap for our FSM pupils in the phonics screening check

3.11 Every Croydon school has a Link Adviser, including academies and free schools, who provide challenge and support to its leaders. A graduated model is used so that schools with inspection outcomes of less than good, with lower pupil outcomes or which are vulnerable in another way, for instance with new leadership, receive more Link Adviser time in order to close the gap between the highest and lowest performing schools. For all schools, discussion focuses on vulnerable groups' achievement and strategies for improvement, including boys' achievement where this is an issue for the school. Link adviser visits include a focus on challenging schools about in-year progress and tracking of pupils to ensure that they have improved outcomes by the end of the year.

3.12 School Progress Review meetings take place termly with the Local Authority to review several schools' performance against their particular priorities. These schools are

among those judged by Ofsted to be less than good, and the meetings provide the challenge to ensure that schools are on track to receive a good judgement at their next inspection.

- 3.13 Link Advisers broker bespoke support from other members of the School Effectiveness team, where necessary, to ensure improvement against school priorities. This includes support for subject leaders to be able to accelerate improvements in reading, writing, mathematics and Early Years provision, support for SEN and Inclusion leads, safeguarding audits, training for Governing boards to improve aspects of their practice and work to ensure accurate assessments of standards in the core subjects.
- 3.14 Prior to partial school closure, a robust programme to recruit moderators for all primary key stages was in place along with a comprehensive CPD programme to support teachers' understanding of national standards, including extremely well-attended moderation clusters for writing (Key Stage 1 and 2) and reading and maths (Key Stage 1) run in localities throughout the borough and facilitated by lead moderators and the moderation manager in order to ensure consistency of teacher assessment judgements. Termly assessment leader briefings prepare primary school leaders for changes in assessment and accountability and, in addition in the Summer Term, provided support for assessment issues relating to the full return to school in September.
- 3.15 The LA mathematics adviser works closely with a local maths hubs in the targeting of schools for and the delivery of mathematics mastery readiness programmes and SEND maths development groups.
- 3.16 The Local Authority is working with an English hub, set up by the DfE to provide support for schools with phonics and early reading provision through audits, funded training and provision of resources. Support is targeted to those schools where the results of the phonics screening are lower than national averages. Within the group of schools eligible for this support, the English Adviser ensures a focus on schools where FSM achievement is particularly low.
- 3.17 Teachers who are new to teaching in year groups involved in statutory assessment (Reception, Year 2 and Year 6) are provided with training opportunities to support their understanding of national standards and the requirements for the administration of the national curriculum tests and for teacher assessment. Training is also provided for teachers administering the phonics screening check. These training events are well-attended and evaluated positively by schools.
- 3.18 We continually revise the LA School Effectiveness Plan which sets aspirational targets and details specific actions to support improved English and mathematics outcomes, by securing differentiated, quality assured training and development. Our targets very specifically include closing the outcomes gaps for our looked after children and for our pupils with special educational needs and disabilities.
- 3.19 In line with the new Ofsted Framework the school effectiveness team has provided training for subject leaders of science and foundation subjects such as art and MFL led by high quality external trainers this year, often from the subject associations, to support schools to have a broad, balanced and well sequenced curriculum that meets

the needs of all pupils in the school. Link adviser visits and Ofsted preparation training have also had a focus on this.

- 3.20 School effectiveness advisers have been involved in the school initiated project on Curriculum and Change as a response to the Black Lives Matter agenda, acting as critical friend to the group, writing resources and brokering training from Hackney LA on cultural competence.
- 3.21 The school effectiveness team works closely with schools to challenge any underachievement and support improvement, including through partnerships with other good or outstanding schools where appropriate. These partnerships are designed to bring about rapid improvement and develop capacity for sustained improvement in standards, quality of teaching and effectiveness of leadership and management. In brokering mentors for new headteachers from good and outstanding Croydon schools, we build leadership capacity for the future.
- 3.22 In response to the pandemic, a significant amount of work has been undertaken with schools to support pupil transition, particularly for those pupils beginning primary school, as well as transition from primary to secondary school. Transition booklets, developed in partnership with schools, were made available to all settings and, despite the challenges of remote working, usual transition meetings for SEND pupils transferring to secondary school took place.
- 3.23 The Learning and Inclusion Board, the membership of which includes the Lead Cabinet Member and the Executive Director of Children, Families & Education Department, provides challenge to the school effectiveness team about the impact of actions that are being taken to improve outcomes in those schools judged by Ofsted to be less than good.
- 3.24 Areas for development and what are we doing to address them at KS4?**

1. Close the gap in outcomes between our highest and lowest performing schools
2. Work closely to support and challenge our schools that are not yet good
3. Improve outcomes for boys at key stage 4 so that the gap between them and the girls is narrowed
4. Analyse the achievement of specific pupil groups and address where we have gaps in outcomes at key stage 4
5 Ensure targetted support for those schools with unexpected drops in pupil outcomes.

- 3.25 We are continuing to ask schools to set targets for the percentage of pupils in receipt of the Pupil Premium Grant making at least expected progress, reflecting the importance of closing the gap between these learners and their peers. The impact of any interventions put in place by schools that are funded by the Pupil Premium Grant is carefully scrutinised and, where such interventions have not had the desired impact, head teachers are required to identify how their evaluations are informing

future plans for spending this funding.

- 3.26 2019/2020 has seen a number of our secondary schools join the termly School Progress Review Meetings with the Local Authority to review their progress against identified priorities. Each school identified for this support is subject to a LA led learning walk which informs the School Progress Review meeting. These meetings are supported by our Secondary Effectiveness Partners and Head of Standards, Safeguarding and Inclusion
- 3.27 There is a key focus on supporting schools requiring improvement to become good, through targeted professional development. This includes bespoke training for governors so that they are able to clearly demonstrate that they offer both challenge and support to schools by focusing on key areas for development whilst holding head teachers to account.
- 3.28 The Learning and Inclusion Board provides challenge to the school effectiveness team about the impact of actions that are being taken to improve outcomes in those schools judged by Ofsted and the LA to be less than good.
- 3.29 In our challenge discussions with schools, we ensure that schools continue to focus on underachieving groups. In the light of the pandemic, we have emphasised the importance of closing emerging gaps for vulnerable pupils as a result of partial school closures.
- 3.30 Areas for development and what are we doing to address them at Post-16?**

1. Improve the attainment of our pupils at A level, and in particular reduce the volume of fails
2. Close achievement gaps
3. Improve the careers advice and guidance offer for our pupils
4. Improved support for our NEET young people

- 3.31 KS5 challenge and support functions for all school sixth forms has now been aligned to support covering KS3 & KS4 with link advisers covering all school improvement across key stage 3 to key stage 5 inclusive. Experienced school improvement specialists have been working with our school sixth forms, with a specific focus on quality and viability of their 6th form provision, progress being made by all learners and raising expectations and achievement of the most able learners.
- 3.32 Additional LA support is targeted at those schools who are deemed to require greater levels of need, based upon detailed analysis of data and performance. This includes support with robust action planning and monitoring.
- 3.33 Croydon Council brokers a data management, analysis and monitoring tool (ALPS) for local post-16 centres, which includes training sessions. This tool is used to identify

areas for improvement and strength, enabling sharing of good practice across centres, as well as supporting pupil tracking and monitoring.

- 3.34 Agreement that centres with particularly poor A level performance and low demand, cease offering an A level curriculum and/or focus on areas of strength. One school sixth form ceased delivery in summer 2019 and another in summer 2020. There is currently ample capacity in the system to accommodate these reductions in provision.
- 3.35 Support to improve the local careers advice and guidance offer, via
- Facilitation of a termly careers leads network, regular updates and availability of careers events and EET opportunities shared with staff and students.
 - Formation of Croydon Careers Partnership group to strategically streamline a cohesive careers education offer for schools & colleges. Group members consist of Croydon Council NEET and also the Economic Growth (Employment & Skills) teams, the Careers Cluster lead from the Education Development Trust and the borough lead from the London Enterprise Adviser Network.
- 3.36 Creation (both hardcopy and digital) of the Post 16 prospectus; distributed to schools and colleges in the borough and available online. This year's edition updated to incorporate a SEND section, which is also available online as a stand-alone copy on the Young Croydon and Local offer websites.
- 3.37 Widening participation programme developed with Churchill College, Cambridge University began roll-out with Croydon schools in January 2020. This is aimed at engaging pupil from year 9 onwards in HE who may not consider progression to university as an option and also preparing academically able students (year 12) for applying to selective universities. The pandemic resulting on a hold being placed on the programme.
- 3.38 Three new NEET caseworkers employed from Sept-19 to provide focussed advice and support to help young people aged 16-18 into education and training. Face to face support has been replaced with virtual support since the commencement of the pandemic.
- 3.39 NEET prevention programme delivered in high NEET generating schools. Programme rolled out in two schools during 2019/2020. Delivery in further 2 schools postponed due to COVID lockdown. As an alternative, schools have been offered virtual support. Learners were also tracked by the NEET caseworkers during the summer holiday to ensure post 16 plans were actioned and confirmed.
- 3.40 1 new CLA NEET officer employed from May 2020 as a dedicated resource for the Leaving Care Service due to high NEET rates amongst the care leaving cohort. This officer shares EET opportunities with social workers and personal advisers, supports with solving EET queries for cases and brokers contact between providers, professionals and young people.
- 3.41 Developed more structured and robust cross council team collaboration to identify and allocate appropriate resource to support NEET young people. This activity includes, but is not restricted to, regular exchange of data, bi-weekly meetings to

determine activity, social media presence, organising and delivering events. Teams which are actively involved are NEET, Virtual School, YOS, SEND, Croydon Works, Youth Service and Economic Growth.

- 3.42 Creation of explicit referral mechanisms: completed referral form via a dedicated inbox and creation of a NEET Panel whereby NEET cases are presented from varying teams and allocated to the most appropriate teams. Plan to amalgamate this panel with the Economic Growth's Training Provider network (to broker direct contact between provider and cases) delayed due to COVID lockdown restrictions / business continuity priorities but will be actioned at the earliest opportunity..
- 3.43 Our virtual offer to schools / colleges has been enhanced during COVID particularly for Yr. 11 – 13 leavers; 1:1 and group contact offered. FAQ brochure developed and shared. Amended provider offer shared with schools, parents / carers and young people. A week of virtual activities arranged for NEET young people during exam results period (culminating in a live event in Croydon Town Centre on GCSE results day). Focus included next steps IAG, opportunity offers from Apprenticeship employers and self-promotion hosted by LinkedIn.

4 Outcomes for Children Looked After

- 4.1 2019-20 is an unprecedented year for national data and standardised results. There will be no formal, external published data or league tables of comparison for any key stage this year due to the impact of school closures under covid-19.
- 4.2 No examinations took place for any pupils. Formal grades were not submitted to examination boards by schools for EYFS, Year 1 pupils or KS1 pupils.

Virtual School Cohort: School Ofsted Ratings

- 4.3 At the end of 2019/20, 90% of statutory school age CLA attended schools rated by Ofsted as 'Outstanding' or 'Good'. Compared to 80.1% the previous year.
- 4.4 The Ofsted rating of a school where the child moves in-year remains a priority for Croydon and there is now a dedicated section in the e-PEP to monitor school moves more closely.

School Ofsted Ratings

	Number
In schools with Ofsted Good or better rating	290
In schools with Ofsted RI rating	25
In schools with Ofsted Inadequate rating	4
In schools where no Ofsted rating was recorded	29 (not yet rated)
Statutory school age not in education	14

- 4.5 Where possible, children are placed in schools rated 'good' or better. However, if a child comes into care while in a school rated less than good, or if a schools' rating is

altered following OFSTED, it may be inappropriate to move their school place simply on the basis of the Ofsted rating of their current school. In these instances, a full risk assessment would be conducted by the VS senior team in collaboration with the school Headteacher and Designated CLA teacher.

Attendance data for children and young people looked after in 2019-20

- 4.6 At the time of writing, attendance for 2019/20 cannot be compared to any attendance data for previous years due to COVID-19 and non-compulsory attendance at school. It has not yet been agreed how school attendance will be monitored and compared nationally, as schools have a range of flexible options that are bespoke and based on their context.
- 4.7 At Croydon Virtual School we continue to receive school data via our online collection system, ASSET. This takes data directly from the schools registration system. We currently collect 96.4% data in this way. The rest is ascertained manually through PEPs and calls to schools.
- 4.8 During the 'lockdown' period of school closures (28 March- July 03 2020) we monitored individual pupil attendance through calls to carers. Our message to carers and establishments, as VS, was that if children and young people were safer at home during this time then they should stay at home. Where individual children needed schooling we advocated for them as key vulnerable children to attend. We called carers weekly to ensure any changing needs were considered. Our attendance figures at their greatest were as follows:

	Rating	Attending School During Covid 19 Lockdown?
Pre School	Nursery	8
Primary School	Year R	8
	KS 1	14
	KS 2	22
	Primary	44
Secondary School	KS 3	14
	KS4	17
	Secondary	31
Post 16		10
		93

Exclusions for CLA

4.9 Permanent exclusions

- There were 2 permanent exclusions of (Secondary) Croydon CLA during the 2019/20 academic year, which is an increase on the previous year's figure of 0. There were no permanent exclusions of primary age pupils. Each of these cases were an extreme incidence of behaviour that was unable to be mitigated despite intense collaboration and involvement of the VS with the school.
- Additional permanent exclusions were issued by schools to Croydon CLA during

2019/20 (one primary age & 2 secondary age), which were subsequently rescinded/revoked following the intervention of the Virtual School.

- A further 3 Croydon CLA were at risk of permanent exclusion, but these never proceeded to permanent exclusion following the intervention of the Virtual School and securing of EHCPs to allow for movement to appropriate specialist settings. (Identifiable pupil data cannot be included here for safeguarding reasons.)

4.10 Fixed term exclusions

School location	2018/19		2019/20	
	No. of Croydon CLA receiving 1 or more FPEX	No. of FPEX issued to Croydon CLA	No. of Croydon CLA receiving 1 or more FPEX	No. of FPEX issued to Croydon CLA
Croydon school	35	59	34	65
Out of LA school	24	48	26	41
TOTAL	59	107	60	106

- A total of 60 Croydon CLA received a total of 106 fixed term exclusions during the 2019/20 academic year. This represents 12.1 % of Croydon's statutory school age CLA cohort of 493. This is broadly in line with last year (18/19) when a total of pupils with fixed term exclusions, which represented 11.8% of an eligible cohort of 501.
- Broken down by those Croydon CLA in 2019/20 who are educated in Croydon and those who are educated in other local authority areas the figures are as follows:

No. of fixed term exclusions issued to CLA in Croydon 19-20

- The Virtual school focus between January and July 2019/20 was on avoiding permanent exclusions and in training staff in 'highest exclusion risk' establishments to work in ways that will have longer term effects on reducing the need for permanent exclusion.
- A full day's training was delivered to over 100 Saffron Valley staff; this centred around working effectively with young people who have experienced significant trauma. The impact of this may be evident in their not having excluded any CLA child this year. The training was followed up with some onsite work at KS4 North; however it needs more time and investment over a longer period to truly be deemed effective.

Key Challenges 2019/20

- 4.11 **Persistent absence rates remain a focus for 20-21.** School Development Plan that continues to be a priority for the Virtual School.

4.12 **Funding and finance- accuracy of monitoring of PPG Spend**

4.13 Croydon Children Looked After **who do not have a full time school offer**. An ongoing focus area will be working closely with admissions and schools to reduce the wait time for children and Young People without a school place, accessing a part-time timetable or being educated offsite.

4.14 **Children not in education and post 16 NEETs**: weekly tracking of our children and young people out of education, employment or training has helped us to identify children and young people not accessing education in much more time focused way. This is working well across statutory school age (only 16 YP were MIE at the end of the academic year 2020 and 10 of these were newly arrived)

4.15 At Post 16, however, the challenge remains more significant as we still lack funds to effect staffing change. We have though grown our capacity from 1- 3 through CMF Grant finds and are ensuring that our strategic plan for collaboration with other key services in the council mean we have this in sharp focus and can work systematically on these cases.

4.16 COVID-19 continuing to provide responsive online support as needed to schools, social workers, carers and CLA as the circumstances continually change.

5. **Attendance**

5.1 Full academic year attendance data for 2019/20 will be published in March/April 2021.

5.2 Attendance information is included as part of the Education Data Dashboard.

5.3 **Persistent absence**

- In the academic year 19/20 the data set was significantly reduced due to the first lockdown that took place from March 23rd 2020. While there was no formal submission, the Education Directorate kept fully in touch with the schools and academies on this.
- Attendance data was shared with the DfE in relation to the period from March 2020 to July 2020

What are we doing to improve overall and persistent absence?

- There is a strong correlation between good school attendance and achieving positive outcomes for young people. It is recognised that attending school regularly is also a protective factor for children and young people.
- Croydon Council's Learning Access has a small team of school facing attendance improvement practitioners, who work directly with schools and parents to improve attendance in addition to our attendance enforcement work.

- The attendance improvement practitioners undertake individual casework around complex cases of children who are missing out on education. They also promote the use of the Early Help pathway and conducted reviews of whole school attendance practice in schools where this is a concern.
- The service will continue to work to improve attendance through individual casework with appropriate cases; whole school support with priority schools; liaison with independent education welfare providers; raising awareness of attendance; and exploring opportunities provided by the new locality early help teams.

6. Exclusions

6.1 Pupils can be excluded from school either permanently or for a fixed period. These are formal sanctions that occur in response to breaches of the schools behaviour policy and there are regulations and guidance covering their use. Parents have various rights of representation in response to an exclusion.

6.2 The national context

- The Department for Education publishes the national comparative rates for exclusions from academies and from local authority maintained schools. This data is published annually in the summer following each academic year once it has been validated. The most recent national data release was for the 2017/18 academic year, which was published in August 2019. Validated data for the 2018/19 academic year will be published in due course.
- The data captures three measures, which are broken down by primary and secondary schools. These are:
 - The number of permanent exclusions and this as a percentage of total pupil numbers;
 - The number of fixed period of exclusions and this as a percentage of total pupil numbers; and
 - The number of pupils with one or more fixed period exclusions and this as a percentage of total pupil numbers.
- The percentage of total pupil numbers is particularly key. This is because with the rising school age population the headline numbers of exclusions may rise but it may not actually rise as a proportion of the total number of pupils in the cohort.

6.3 Primary Inclusion Forum and Fair Access Panel

- The Primary inclusion Forum is used as a staged approach process and a collaborative meeting where all primary schools can refer cases for discussion. We aim to have a maximum of 6 cases per forum. Feedback from schools who have attended with complex cases continues to be positive. Due to the forum being multi agency a number of positive strategies have been offered and

ensured we had less pupil movement.

- During the academic year 2019/2020 33 cases were discussed between October – March inclusive. No further meetings were held in that academic year due to COVID 19 lockdown.
- This academic year we have had 8 cases in the autumn term.

6.4 Secondary Fair Access

- The Fair Access Panel formalised much of the managed moves that had previously occurred between secondary schools. The panel acts in part as a managed move brokerage for Croydon schools and provides a greater level of scrutiny, transparency and accountability than the previous system where managed moves were individually negotiated at school level. All referrals to the panel must have the consent of the pupil's parent/carer before they can be considered.
- The panel can offer pupils who have been referred either a place at another mainstream secondary school or a place either at Saffron Valley Collegiate, our secondary PRU or in another alternative provider. Parents can decline the offer from the fair access panel if they wish. In those circumstances it would be for the head teacher of the school to decide whether or not they then wish to proceed with the formal permanent exclusion process.
- The panel also considers hard to place pupils from admissions. These could be pupils who are new to Croydon who are in need of a school place but whose personal histories make securing a school place more challenging or they could be pupils considered ready for reintegration to a mainstream school from Saffron Valley Collegiate.
- The panel is co-ordinated by the local authority and chaired by a senior leader from a Croydon academy. Senior representatives from most Croydon secondary schools attend as do key people from the police, children's social care and the youth offending service so ensuring there is a holistic multi-agency approach to deliberations and the decision on any new placement is informed by a range of information.
- Referrals to the fair access panel are considered under one of three categories. These are:
 - Cases – hard to place pupils who are unable to secure a school place through normal admission procedures and need to be placed under the Fair Access Protocol
 - Alternative to exclusion – referrals from schools as an alternative to permanent exclusion
 - Prevention – referrals from schools for other reasons (i.e. a breakdown in relationships) where a managed move is felt to be desirable
 - Breakdown – referrals from schools that are referred back to the panel after a placement has broken down

Secondary 2019/20 -	Alternative to Permanent Exclusion	57
	Cases	45
	Prevention	68
	Breakdown Total	24

- Numbers were reduced as Secondary FAP was cancelled from March –June 2020 due to COVID 19.
- This current year we have all schools supporting pupils more in school and were clear that limited movement should take place due the young people going through a extremely turbulent time. Many suffering from trurma and loss of family members during the period of lock down. Current numbers for the autumn term are reduced.

Secondary 2020/21 -	Alternative to Permanent Exclusion	13
	Cases	24
	Prevention	20

- All our secondary schools have worked hard to maintain placements and ensured that we do not manage move pupils without a just reason. They have worked well with the local authority requesting support at the earliest opportunity.
- Secondary FAP is now held via TEAMS and this has been very successful. Schools now present via a powerpoint summary of the agenda is also sent out in advance.

6.5 What are we doing to reduce exclusions?

- A number of steps are being taken to work with schools to reduce their need to exclude pupils. These include:
 - Renewed focus on disproportionality of exclusions in different groups of pupils this was a major piece of work that began in February 2020. Schools and academies are supported with Inclusion in the following ways:
 - Officer & adviser visits (Inclusion Adviser, School Effectiveness Partners, Fair Access Manager, Exclusions Officer, Interim Head of Standards, Safeguarding and Inclusion, Pupil Wellbeing Adviser) this totals to 9.8 FTE officers and advisers to support 123 schools.
 - Safeguarding visit follow up where exclusions are a standing item to be recorded.
 - One voice approach to walk alongside schools
 - Support with pupils who are at risk of exclusion through Attendance Officers and School Effectiveness Partners
 - A collaborative approach at Fair Access Panel where schools and academies must be able to be collegiate in accepting referrals as well as

offering them.

- Safeguarding visits take particular note of exclusion rates in schools and there is a discussion about how the safeguarding of these pupils is ensured. This is then recorded in the note of visit which is copied to the headteacher and governing body.
- Concerns raised by officers and advisers can be referred to the Safeguarding team for further study, if appropriate.
- School to school behaviour support is also brokered by the Directorate where schools face similar challenges.
- Curriculum and timetabling support has also been provided to schools through supporting identification of behavioural hotspots (eg times of the week or particular subject areas) or on curricular timetabling for vulnerable groups.
- Links with businesses and technical institutions are being piloted by a small number of schools in Croydon to ensure that destinations points (other than Universities) are highlighted with pupils and parents. All schools meet the Independent Careers Education Advice and Guidance requirements.
- Work has been undertaken by the Fair Access Panel Manager to ensure that ethnicity is recorded on all cases being brought to FAP prior to discussion. Resource input is required for retrospective analyses of this data.
- At primary level to promote collaborative working through the Primary Inclusion Forum and offer respite AP placements through the Primary Fair Access Panel
- At secondary level continue to utilise the the Secondary Fair Access Panel as a forum to broker managed moves to other schools and offer AP placements for pupils at risks of permanent exclusion; whilst also providing greater challenge to schools around the referrals they seek to make to the panel.
- Exclusions prevention officer to provide support for individual cases where appropriate before the permanenet exclusuion is given
- Promote the use of devolved cluster funding to support pupils with additional needs who are at risk of exclusion.
- Pro-actively indentify from fixed term exclusion data pupils who are becoming at risk of exclusion and seek to work with schools regarding those pupils.
- Work with schools where they identify a pupil at risk of exclusion and seek to find alternative solutions that prevent the need to exclude.
- Provide challenge and support to targetted high excluding schools to seek to reduce those school's use of exclusions

6.6 Use of Internal Withdrawal Systems in Schools

- Croydon Schools and Academies have a variety of ways of reducing exclusions. These include systems of withdrawal from lessons. In some schools these are tiered, in that subject areas operate their own withdrawal systems where pupils can work in other classes, and then an escalation to a whole school withdrawal area. In other schools and academies there is a universal, centralised approach, where one specific area is identified and pupils are removed to that area.

- The Local Authority does not hold data on referrals to these systems within the schools.
- An examination of the different groups of pupils being referred to these areas prior to any formalised exclusion would be of use.
- A short study into how governors are informed of these referrals, frequency and outcomes would be of use. This will be investigated by the Safeguarding and Inclusion Team.

7. OFSTED INSPECTION OUTCOMES

- 7.1 A new Ofsted inspection framework came into effect in September 2019. The main changes were to strengthen the focus on the wider curriculum with “deep dives” into foundation subjects, and to mark out the outstanding judgement as “exceptional.” All routine inspections and the publication of inspection reports were suspended in March 2020 due to COVID-19.
- 7.2 15 inspections took place in Croydon schools in 2019-20 and three monitoring visits.

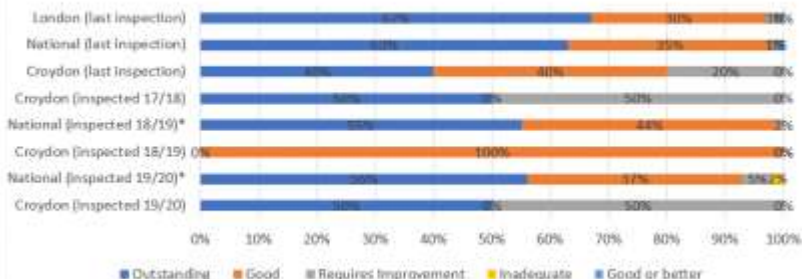
Ofsted judgement	Primary	Secondary	Total
Outstanding	0	0	0
Good	8 ¹	1	9
Requires Improvement	2	1	3
Inadequate	3	0	3

This year nationally 78% of schools have been judged good or outstanding for overall effectiveness, a decrease from 80% last year. The percentage judged outstanding has decreased by 3 percentage points compared with last year, while the percentage judged good remains the same.

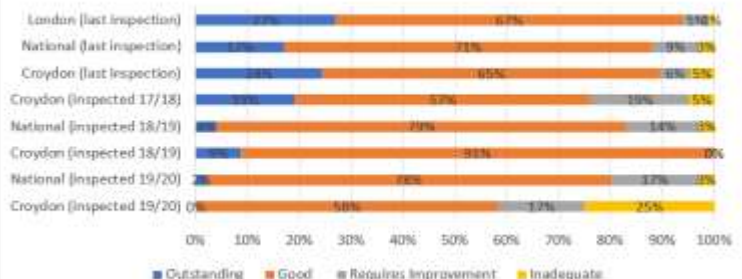
Currently, 90% of all Croydon’s schools that have been inspected were judged by OFSTED to be good or better. The current national average is 86%. This is broken down into phases below.

¹ including one which indicated that the outcome might improve in a section 5 inspection

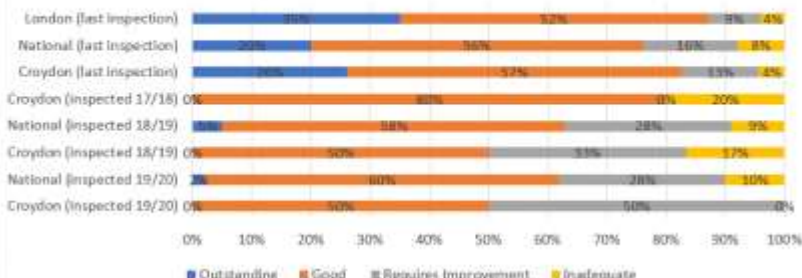
Nursery Ofsted inspections 31.07.20



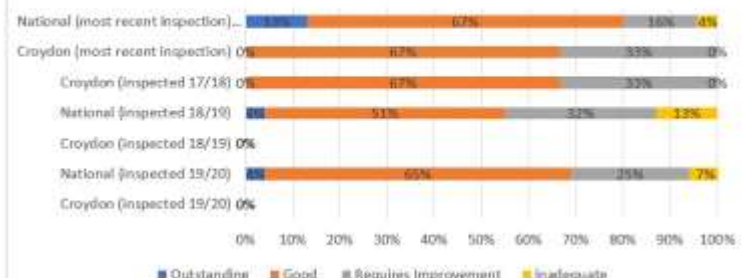
Primary Ofsted Inspections 31.07.20



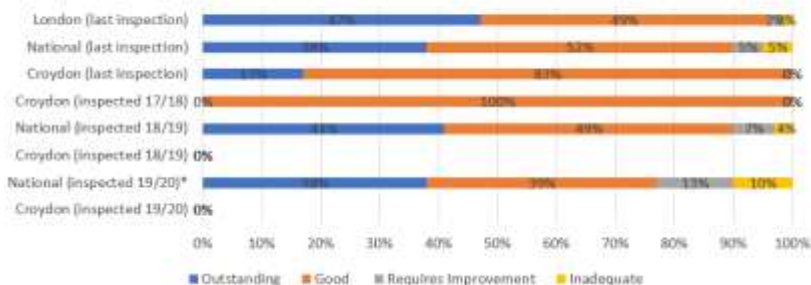
Secondary Ofsted Inspections 31.07.20



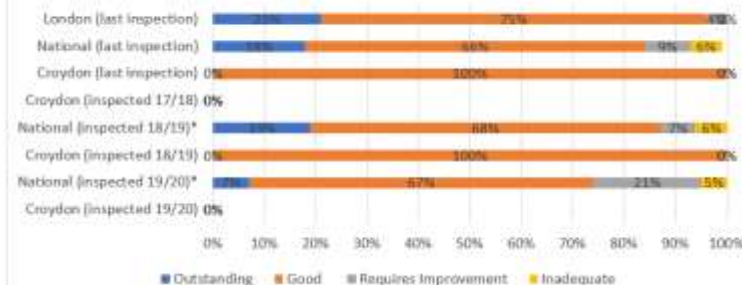
College Ofsted Inspections 30.06.20



Special School Ofsted Inspections 31.07.20



PRU Ofsted Inspections 31.07.20



7.3 Actions being taken to improve Ofsted judgements:

- Training for school leaders and governors has been provided in relation to the Ofsted framework and is refreshed at frequent intervals. Ofsted trained staff deliver this training. Although this is available for all schools, we target schools that are due for an inspection to be part of this training. Bespoke training is also available where necessary for individual governing boards, leadership teams and MATs. Coaching for middle leaders also takes place as subject leads are a key part of the inspection process in the new framework with its focus on the wider curriculum. English leads have been prepared for the “deep dive” into reading which is now part of every primary inspection.
- All aspects of school improvement work (as detailed in section 3.12 to 3.26) support schools to be prepared for any upcoming inspection. This support is across a range of areas, will be tailored to each school’s priorities and includes improving teaching and learning in schools by working alongside subject and middle leaders to audit needs and implement changes as well as using the subject knowledge of the advisers in whole school training in particular aspects of subjects.
- In accordance with the graduated school improvement offer, additional support is provided to schools with an Ofsted judgement that is less than good and to good or better schools with emerging vulnerabilities. Support given is bespoke to school needs and may include additional Link Adviser time to strengthen leadership e.g. support for development planning and subsequent actions including monitoring and evaluation of impact. It may involve work with particular layers of leadership, including governance, as school needs dictate.
- Additional work with schools may include support from the other members of the school effectiveness team e.g. the inclusion and learning access advisers, subject advisers and the assessment adviser.
- The school effectiveness team has provided a universal offer of training based on identified areas of priority such as vocabulary development, reading fluency and comprehension skills for KS2 readers and curriculum subject leadership. Participation is monitored and vulnerable schools are targeted in order to ensure their attendance and the impact on pupil outcomes is followed up by the link adviser. Additionally, specific training has been held for Year 6 teachers in order to accelerate pupil progress in reading and writing in preparation for national curriculum assessments.

7.4 Challenge to underperforming schools

- Where schools are underperforming, a range of actions are taken to challenge them to improve. In the first instance challenge is provided by the school’s Link Adviser and followed up by the Head of Standards where necessary and appropriate. This will often have a positive impact on schools and support them with taking appropriate actions to improve outcomes.
- Where further intervention is judged to be necessary, for example where the school

is not improving rapidly enough or when it is vulnerable in terms of an adverse OFSTED inspection, the school is subject to detailed termly school progress review meetings (SPRMs). In the most serious situations the LA uses its statutory powers of intervention to do one or all of the following:

- Apply to the Secretary of State for the governing body to be replaced with an Interim Executive Board (IEB)
 - Withdrawal of delegated budget
 - Appointment of additional governors
 - Issue a Warning Notice
- We also issue non-statutory letters of concern which result in formal meetings with the head teacher and chair of governors. Where appropriate we support and challenge the governing body to follow necessary performance management / capability processes.
 - In addition, schools are encouraged to collaborate with good and outstanding schools, through either informal or formal arrangements.
 - Where we are concerned about the performance of academies we have formal conversations with the regional schools commissioner.

8. PRE-DECISION SCRUTINY

8.1 This report went to Children and young People's scrutiny 19 January 2021.

9. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

9.1 There are no financial implications to this report

Approved by: Lisa Taylor – Director of Finance, Investment and Risk and Section 151 Officer

10. LEGAL CONSIDERATIONS

The Solicitor to the Council comments that there are no direct legal implications arising from the recommendations in this report.

Approved by: Doutimi Aseh, Head of Social Care & Education Law for and on behalf of the Borough Solicitor and Monitoring Officer.

11. HUMAN RESOURCES IMPACT

There are no direct HR implications arising from this report.

Approved by: Nadine Maloney, Head of HR CFE on behalf of Sue Moorman, Director of HR

12. EQUALITIES IMPACT

- 12.1 We are continuing to ask schools to set targets for the percentage of pupils in receipt of the Pupil Premium Grant making at least expected progress, reflecting the importance of closing the gap between these learners and their peers
- 12.2 A graduated model is used so that schools with inspection outcomes of less than good, with lower pupil outcomes or which are vulnerable in another way, for instance with new leadership, receive more Link Adviser time in order to close the gap between the highest and lowest performing schools. For all schools, discussion focuses on vulnerable groups' achievement and strategies for improvement, including boys' achievement where this is an issue for the school.
- 12.3 The Local Authority is working with an English hub, set up by the DfE to provide support for schools with phonics and early reading provision through audits, funded training and provision of resources. Support is targeted to those schools where the results of the phonics screening are lower than national averages. Within the group of schools eligible for this support, the English Adviser ensures a focus on schools where FSM achievement is particularly low.
- 12.4 School effectiveness advisers have been involved in the school initiated project on Curriculum and Change as a response to the Black Lives Matter agenda, acting as critical friend to the group, writing resources and brokering training from Hackney LA on cultural competence.
- 12.5 We are continuing to ask schools to set targets for the percentage of pupils in receipt of the Pupil Premium Grant making at least expected progress, reflecting the importance of closing the gap between these learners and their peers. The impact of any interventions put in place by schools that are funded by the Pupil Premium Grant is carefully scrutinised and, where such interventions have not had the desired impact, head teachers are required to identify how their evaluations are informing future plans for spending this funding.
- 12.6 In our challenge discussions with schools, we ensure that schools continue to focus on underachieving groups. In the light of the pandemic, we have emphasised the importance of closing emerging gaps for vulnerable pupils as a result of partial school closures.
- 12.7 Croydon Children Looked After who do not have a full time school offer. An ongoing focus area will be working closely with admissions and schools to reduce the wait time for children and Young People without a school place, accessing a part-time timetable or being educated offsite.
- 12.8 Children not in education and post 16 NEETs: weekly tracking of our children and young people out of education, employment or training has helped us to identify

children and young people not accessing education in much more time focused way. This is working well across statutory school age (only 16 YP were MIE at the end of the academic year 2020 and 10 of these were newly arrived)

- 12.9 A number of steps are being taken to work with schools to reduce their need to exclude pupils. These can be found in section 6.5

Approved by: Yvonne Okiyo, Equalities Manager

13. ENVIRONMENTAL IMPACT

- 13.1 N/A

14. CRIME AND DISORDER REDUCTION IMPACT

- 14.1 N/A

15. OPTIONS CONSIDERED AND REJECTED

- 15.1 N/A

16. DATA PROTECTION IMPLICATIONS

16.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'

NO

16.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED

NO

This report does not include any personal data.

Approved by: Shelley Davies, Interim Director of Education

CONTACT OFFICER: Shelley Davies, Director of Education and Youth Engagement. (Interim)

BACKGROUND DOCUMENTS: None

For General Release

REPORT TO:	CABINET 18 FEBRUARY 2021
SUBJECT:	STAGE 2: RESPONSE TO RECOMMENDATIONS ARISING FROM: CHILDREN & YOUNG PEOPLE SUB-COMMITTEE HELD ON 3 NOVEMBER 2020, THE HEALTH & SOCIAL CARE SUB-COMMITTEE HELD ON 10 NOVEMBER 2020 AND THE SCRUTINY & OVERVIEW COMMITTEE HELD ON 17 NOVEMBER 2020
LEAD OFFICER:	Jacqueline Harris Baker, Executive Director of Resources and Monitoring Officer Stephen Rowan, Head of Democratic Services and Scrutiny
CABINET MEMBER:	All
WARDS:	All
COUNCIL PRIORITY/POLICY CONTEXT	
The constitutional requirement that Cabinet receives recommendations from scrutiny committees and to respond to the recommendations within two months of the receipt of the recommendations.	
FINANCIAL IMPACT	
The recommendations in the appendix to this report may have a financial implication and as each recommendation is developed the financial implication will be explored and approved.	
FORWARD PLAN KEY DECISION REFERENCE NO.: not a key decision	

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below:

1. RECOMMENDATIONS

- 1.1 Cabinet is recommended to approve the response and action plans attached to this report at Appendix A and that these be reported to the Scrutiny and Overview Committee or relevant Sub-Committees.

2. EXECUTIVE SUMMARY

2.1 This report asks the Cabinet to approve the full response reports arising from the Stage 1 reports presented to the Cabinet meeting held on 14 December 2020 including:

- Action plans for the implementation of agreed recommendations, or
- Reasons for rejecting the recommendations

and that these be reported to the Scrutiny and Overview Committee or relevant Sub-Committees.

2.2 The Constitution requires that in accepting a recommendation, with or without amendment, from a Scrutiny and Overview Committee or Sub-Committee, the Cabinet shall agree an action plan for the implementation of the agreed recommendations and shall delegate responsibility to an identified officer to report back to the Scrutiny and Overview Committee or Sub-Committee, within a specified period, on progress in implementing the action plan.

3. SCRUTINY RECOMMENDATIONS

3.1 The Scrutiny recommendations are contained in the schedule in the appendix to this report.

3.2 The detailed responses including reasons for rejected recommendations and action plans for the implementation of agreed recommendations are contained in the appendices.

4. CONSULTATION

4.1 The recommendations were developed from the deliberations of either the Scrutiny & Overview Committee or one of its Sub-Committees.

4.2 The recommendations in the appendix to this report may involve further consultation and as each recommendation is developed these implications will be explored and approved.

5 PRE-DECISION SCRUTINY

5.1 The recommendations in the appendix to this report are the result of Pre-Decision Scrutiny.

6. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 6.1 The recommendations in this report may have a financial implication and as each recommendation is developed the financial implication will be explored and approved.

Approved by: Lisa Taylor - Director of Finance, Investment and Risk and S151 Officer

7. LEGAL CONSIDERATIONS

- 7.1 The Head of Litigation and Corporate Law comments on behalf of the Interim Director of Law and Governance that the Constitution requires that Cabinet both receives recommendations from Scrutiny Committees and responds to the recommendations within two months of their receipt.

Approved by: Sandra Herbert - Head of Litigation and Corporate Law on behalf of the Interim Director of Law and Governance.

8. HUMAN RESOURCES IMPACT

- 8.1 The recommendations in the appendix to this report may have a Human Resources impact and as each recommendation is developed these implications will be explored and approved.

9. EQUALITIES IMPACT

- 9.1 The recommendations in the appendix to this report may have an Equalities impact and as each recommendation is developed these implications will be explored and approved.

10. ENVIRONMENTAL IMPACT

- 10.1 The recommendations in the appendix to this report may have an Environmental impact and as each recommendation is developed these implications will be explored and approved.

11. CRIME AND DISORDER REDUCTION IMPACT

- 11.1 The recommendations in the appendix to this report may have a Crime and Disorder reduction impact and as each recommendation is developed these implications will be explored and approved.

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

12.1 These are contained in the appendix to this report.

13. OPTIONS CONSIDERED AND REJECTED

13.1 These are contained in the appendix to this report.

14. DATA PROTECTION IMPLICATIONS

14.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

The recommendations in the appendix to this report may involve the processing of 'personal data' and as each recommendation is developed these implications will be explored and approved.

14.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

NO

The recommendations in the appendix to this report may require a DPIA and as each recommendation is developed these implications will be explored and a DPIA carried out where necessary.

CONTACT OFFICER:

Stephen Rowan, Head of Democratic Services and Scrutiny
T: 020 8726 6000 X 62529
Email: stephen.rowan@croydon.gov.uk

APPENDICES:

Appendix A: Scrutiny Stage 2 Responses

BACKGROUND DOCUMENTS:

Background document 1:

Meeting of the Children & Young People Sub-Committee held on 3 November 2020
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=167&MId=2147>

Background document 2:

Meeting of the Health & Social Care Sub-Committee held on 10 November 2020
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=168&MId=2161&Ver=4>

Background document 3:

Meeting of the Scrutiny & Overview Committee held on 17 November 2020
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=2154&Ver=4>

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPT/ REJECT RECOMMENDATIONS (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
Report: Croydon Safeguarding Children's Board Annual Report 2019-20 (Considered by Children & Young People Sub-Committee on 3 November 2020)							
<p>1. That the Partnership is invited to the March 2021 meeting of the Children and Young People Sub-Committee to provide further assurance that the significantly low number of antenatal and developmental check visits in the borough is being recognised, understood and that action is being taken.</p>	<p>The antenatal visits in Croydon were significantly lower than our statistical neighbours and felt that there was neither recognition of this nor detail on how performance would be improved.</p> <p>Health visitor developmental checks are well below target and recently performance has deteriorated. Developmental checks are a clear opportunity to identify the potential for neglect yet this synergy with the Neglect priority group appears not to have been recognised.</p>	<p>Councillor Alisa Flemming</p> <p>Children Families & Education</p>	<p>Accepted - PowerPoint report provided by David Garratt, Associate Director of Operations. Integrated Women's, Children's & Sexual Health Directorate, Croydon Health Services NHS Trust:</p>	<p>Elaine Clancy</p>	<p>For discussion</p>	<ul style="list-style-type: none"> - Strategy agreed with commissioning - March 2021 - Implementation of Strategy - 2021 	<p>2 March 2021</p>
<p>2. The Chair of the Children & Young People Sub-Committee meets with representatives for safeguarding arrangements and the Cabinet Member for Children, Young People & Learning to discuss a forward course of action to ensure the bodies work productively alongside each other in fulfilling their functions.</p>	<p>The Children & Young People Sub-Committee and the Croydon Safeguarding Children Partnership Independent Chair/Scrutineer needed to find a synergy in their work, as there was a risk of duplicating their scrutiny functions.</p>	<p>Councillor Alisa Flemming</p> <p>Children Families & Education</p>	<p>Accepted.</p>	<p>Debbie Jones</p>	<p>None</p>	<p>Recruitment of Independent Scrutineer (March 2021)</p>	<p>2 March 2021</p>

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPT/ REJECT RECOMMENDATIONS (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
3. That a written briefing be prepared for the Children & Young People Sub Committee providing further information and assurance on what the partly achieved and not achieved outcomes meant for the children and how they were being addressed.	As the targets for neglected children had only been partially achieved, there was insufficient context in the report to explain the reasons for this.	Councillor Alisa Flemming Children Families & Education	Accepted. Report provided by Anita McGrath, CSCP	Debbie Jones	None	Report to be presented at March Scrutiny panel.	2 March 2021
4. When the Croydon Safeguarding Children Partnership returns to the Children & Young People Sub-Committee in 12 months additional information is provided on how the objectives for the children in the disability priority group were being put into practice and achieved.	There was a lack of evidence to show how children with and without disabilities were being meaningfully communicated with and how their experiences were understood. There was insufficient evidence to indicate whether children at risk had any influence on how the outcomes were measured.	Councillor Alisa Flemming Children Families & Education	Accepted. Objectives identified and being proactively addressed by CSCP Quality Improvement Group.	Debbie Jones	None	Additional information to be included in next annual report (December 2021)	2 March 2021
5. That future annual reports of the Croydon Safeguarding Children Partnership include much greater reporting of outputs and outcomes.	The targets were not quantified so progress and results achieved were difficult to gauge.	Councillor Alisa Flemming Children Families & Education	Accepted. CSCP dataset to reflect request for outcome based reporting (current focus on output)	Debbie Jones	None	Quality Improvement Group and Independent scrutineer will define outputs and outcomes through 2021, for inclusion in the annual report.	2 March 2021

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPT/ REJECT RECOMMENDATIONS (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
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Report: Croydon Safeguarding Adults Board Annual Report 2019-19 (Considered by Health & Social Care Sub-Committee on 10 November 2020)

<p>1. That a training needs assessment be carried out and for the partnership to continue to challenge its self on increased awareness of and improving the experiences of people with disabilities.</p>	<p>There was a lack of evidence of staff awareness and adequate training on communicating with and understanding the needs of with people with disabilities such as Autism.</p>	<p>Councillor Janet Campbell Health, Wellbeing & Adults</p>	<p>Accept.</p>	<p>Guy Van Dichele</p>	<p>NA</p>	<p>6 January – recommendation taken and discussed at the CSAB Chairs Sub group. Actions agreed: to look at how people with autism are presented across all agencies and not just the Local Authority; to liaise with performance and LD colleagues regarding data and to link into work which is currently being undertaken eg by the LD Partnership Board. 12 January – to be discussed at the CSAB Performance & QA sub group. How is data being collected and address the gaps, agreeing next steps. 17 February – CSAB Training and Improvement sub group meeting – agenda item to address the recommendation from Scrutiny.</p>	<p>9 March 2021</p>
<p>2. That a briefing be provided to the sub-committee on what steps the partnership will take on improving the experiencing of BAME.</p>	<p>Although work had begun to unpick the experiences of the BAME community, Members were not reassured that the partnership yet has a clear pathway to manging the issues with communication and engagement with the BAME community.</p>	<p>Councillor Janet Campbell Health, Wellbeing & Adults</p>	<p>Accept</p>	<p>Guy Van Dichele</p>	<p>NA</p>	<p>6 January – CSAB Chairs sub group discussed recommendation and ways forward. Action: Briefing to be completed for the BAME agenda item at the 27 January CSAB meeting and to include actions for agencies/people going</p>	<p>9 March 2021</p>

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPT/ REJECT RECOMMENDATIONS (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
						<p>forward. Discussion to include composition of the board.</p> <p>High level strategic meetings have been held led by the CSAB Independent Chair, these discussions will feed into the work of the CSAB Voice of the People Sub Group.</p> <p>Voice of the People is a fairly new sub group which have met twice. There has been a rapid expansion of members since the first meeting which now includes the CE of the Croydon Asian Resource Centre, CE of the Croydon BAME Forum, Healthwatch and Croydon's User & Engagement Officer. Using the existing groups which members are part of is key eg events held by the Asian Resource Centre and organized Zoom calls by the BAME Forum.</p> <p>The group will continue to link with other networks in order to raise awareness across all communities learning from other SABs across the county (Leeds presented their work at the group's last meeting).</p>	

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPT/ REJECT RECOMMENDATIONS (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
						Following the board meeting on the 27/1/21 the briefing paper will be revised and shared with the Health & Social Care Sub-Committee.	

Report: Croydon Renewal Plan (Considered by Scrutiny & Overview Committee on 17 November 2020)

Page 287	1. The Council's culture needs to change and the renewal plan must set in train meaningful proposals to enable this, including developing a mechanism that allows Scrutiny to judge whether progress is being made.	The Committee welcomed the action taken by the executive leadership team to begin to recognise the extent of the workforce challenges, however it is essential that developing a full understanding of the situation be treated as a priority to allow processes to be put in place to ensure change can be driven forward effectively.	Councillors Hamida Ali, Stuart King & Callton Young Resources	Accept. The improvement plan will not succeed without inclusive behavior and culture change, which promotes enhanced responsibility and accountability that can be measured.	Katherine Kerswell	Yes. (may have financial implications, depending on the scale of engagement plan that is required)	From April 2021 ongoing	
	2. That the Council should increase the level of General Fund reserves held from its current 3% to 5% target to a more prudent level recommended by Section 151 Officer of around £50m.	The confirmation of the situation regarding the Council's financial reserves in the S114 report was both disappointing and alarming, and as such it was imperative that the necessary steps be taken as part of the financial recovery plans to increase reserves to a prudent level	Councillors Hamida Ali, Stuart King & Callton Young Resources	Accept.	Katherine Kerswell	Yes. The 2020/21 budget made a provision to increase general fund reserves by £5m in year (this was the first time such a provision has been made for a number of	Annually over the MTFS period	As part of the regular budget reports

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPT/ REJECT RECOMMENDATIONS (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
	based on an assessment of the risks facing the authority. Measures must be put in place to ensure that the reserves are maintained at the required level with alerts in place should they fall below acceptable levels.				years). The MTFS makes provision to continue to increase General Fund Reserves by a further £5m per annum so by the end of the MTFS period general fund reserves will have increased by £50m. Note current		
3. The Council should review its other existing plans and other reviews that are currently being undertaken to avoid duplication or inconsistency.	The Committee welcomed the early opportunity to contribute towards the development of the Croydon Renewal Plan and recognised that it was still an emerging plan that had yet to evolve into the full set of strategies and action plans to allow for in-depth scrutiny.	Councillors Hamida Ali, Stuart King & Callton Young Resources	Accept. The improvement plan has brought together circa 400 recommendations from various reviews. The programme management structure will provide corporate oversight to avoid duplication or inconsistency.	Katherine Kerswell	No direct implications.	January 2021	Regularly as part of performance reports
4. That the Council, as part of its proposals, is clear on defining its future operating model.	It was vital that clearly defined steps be taken when designing the future operating model of the organisation, as there were concerns that without this the Council could repeat past mistakes which had led to poor budget setting processes, weak financial monitoring and a failure to deliver promised saving either at pace or at all.	Councillors Hamida Ali, Stuart King & Callton Young Resources	Accept. New priorities and new ways of working have been adopted by Council and incorporated in to the Improvement Plan	Katherine Kerswell	No.	December 2020	February 2021

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPT/ REJECT RECOMMENDATIONS (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
<p>5. The Leader and Cabinet must ensure that a robust monitoring and accountability framework is an integral part of the plan, which is transparent to the residents of Croydon, the Council's workforce, and councillors.</p>	<p>It was evident that the appropriate tools required to maintain sound financial management had not been in place to date and in driving forward improvements, robust measures to close the budget gap must be sought and implemented.</p>	<p>Councillors Hamida Ali, Stuart King & Callton Young</p> <p>Resources</p>	<p>Accept.</p>	<p>Katherine Kerswell</p>	<p>Yes. To be contained within the growth allocated to the the finance team in the 2021/22 budget (formal approval of budget – Feb 2021 cabinet and March 2021 Council)</p>	<p>April 2021</p>	<p>As part of the regular budget reports</p>
<p>Page 289</p> <p>6. That the Cabinet recommends:</p> <p>a) The Engagement Plan is appended to the Croydon Renewal Plan as it would evidence how engagement with staff, councillors and the community will be included in its renewal plan.</p> <p>b) The Council reassess the mechanisms and processes in place for access to information for Councillors.</p>	<p>The Committee concluded that:</p> <p>a) The the lack of the senior leadership's maintenance of line of sight and openness had been exposed by recent events and the executive leadership team must now prioritise addressing this.</p> <p>b) Careful consideration needed be given to the role of the public in the Council's improvement journey and the communication strategy it would adopt to ensure effective dissemination of information to residents.</p>	<p>Councillors Hamida Ali, Stuart King & Callton Young</p> <p>Resources</p>	<p>Accept.</p> <p>Improvements are being made to the performance reporting to improve information to Councillors. We want staff, partners and residents to be at the heart of our improvement journey, and engagement will be a key plank of the renewal plan communications strategy. We will continue to review our communications to ensure we are encouraging feedback and input into the council's plans through a wide range of channels.</p> <p>Rights of access to information for councillors are defined in legislation and set out within the Constitution agreed by full Council. A review of the Access to Information provisions within the Constitution will be</p>	<p>Katherine Kerswell</p>	<p>Yes. (may have financial implications, depending on the scale of engagement plan that is required)</p>	<p>Ongoing</p>	<p>NA</p>

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	c) Engagement with staff should be sought in order to incorporate their views and ideas in shaping the Council's plans.		undertaken to ascertain if improvements can be made to promote clarity of councillor rights around access to information				
<p>7. The Council set out how both the Scrutiny & Overview Committee and the General Purposes and Audit Committee will be facilitated to carry out their governance roles in regards of the Croydon Renewal Plan, including defining the remit of both Committees, the information that will be provided and the level of support that can be expected.</p>	<p>It was important that the political and executive leadership of the Council supported the Scrutiny & Overview Committee in maintaining a line of sight over the Council's new priorities and principles and in seeking assurance on the trajectory of its plans and visions as appropriate.</p>	<p>Councillors Hamida Ali, Stuart King & Callton Young</p> <p>Resources</p>	<p>The Constitution approved by full Council currently sets out the terms of reference and responsibilities for the SOC and GPAC. These will be reviewed to ascertain whether any update is required to capture their additional governance roles in regards the Croydon Renewal Plan</p>	<p>Jacqueline Harris Baker</p>	<p>NA</p>	<p>NA</p>	<p>NA</p>

REPORT TO:	CABINET 18 February 2021
SUBJECT:	CALL-IN – REFERRAL TO CABINET: EMISSION-BASED PARKING CHARGES
LEAD OFFICER:	Shifa Mustafa, Executive Director, Place
CABINET MEMBER:	Councillor Muhammad Ali, Cabinet Member for Sustainable Croydon
WARDS:	All
<p>CORPORATE PRIORITY/POLICY CONTEXT/AMBITIOUS FOR CROYDON: Croydon’s Parking Policy 2019-2022, including its objective for introducing emission-based parking charges, supports the following corporate strategies and policies:</p> <ul style="list-style-type: none"> • Air Quality Action Plan 2017-2022 • Croydon Local Plan • Health and Wellbeing Strategy • Local Implementation Plan (LIP3) • Croydon Cycling Strategy 2018-23 	
<p>FINANCIAL IMPACT: Implementing the decision that was subject to the Scrutiny Call-in commits the Council to £150k capital expenditure and (£200k) income in-year. The full-year income effect in 2021/22 is forecast to be (£832k).</p>	
<p>KEY DECISION REFERENCE: 0220PL The key decision was taken by Executive Director Place on 18 December 2020 and considered by the Scrutiny & Overview following a Call-In on 7 January 2021.</p>	
<p>The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below</p> <p style="margin-left: 40px;">1. RECOMMENDATIONS:</p> <p>The Cabinet is recommended to:</p> <p style="margin-left: 40px;">1.1 Note the grounds for referral made by the Scrutiny & Overview Committee on the Emission-based Parking Charges key decision.</p> <p style="margin-left: 40px;">1.2 Agree that:</p> <p style="margin-left: 80px;">1) Parking charges across the Borough are increased in line with the recommendations made in Key Decision No.: 5120ETR - Parking charges review January 2021 Key Decision No.: 0220PL - EMISSION-BASED PARKING CHARGES</p>	

- 2) That where current free parking bays exist across the Borough that these remain free for the current time and that to note that a report will be submitted to the Traffic Management Advisory Committee that will explore the options available to achieve the policy outcomes required within the Parking Policy.

2. EXECUTIVE SUMMARY

- 2.1 A meeting of the Scrutiny & Overview Committee was held on 7 January to consider a call-in of the Emission-Based Parking Charges key decision (0220PL). The decision taken by the Executive Director for Place was the subject of the call-in was:-

The Executive Director for Place having consulted the Cabinet Member
RESOLVED :

1. *Considered the responses received (Appendix 4) to the consultation on the proposed Traffic Management Order that would introduce emission-based P&D parking charges, which includes the introduction of maximum 2-hour emission-based P&D parking charges in the places where 1-hour free P&D parking currently exists.*
 2. *Agreed that there are no significant changes as a result of the consultation which would necessitate further consultation.*
 3. *Agreed to introduce the emission-based P&D parking charges detailed in the Public Notices that was consulted on and are shown in Appendix 1 and 2.*
 4. *Agreed for officers to inform the objectors of the above decision and reasons.*
- 2.2 Having reviewed the call-in and having had the opportunity to question both the Cabinet Member for Sustainable Croydon and officers on the decision, the Committee reached the conclusion that it would refer the decision to Cabinet for further consideration. The grounds for this referral are outlined in paragraph 3.6 below.

3. REPORT FROM THE SCRUTINY & OVERVIEW COMMITTEE CONSIDERATION OF EMISSION BASED PARKING CHARGES CALL-IN

- 3.1 During its consideration of the call-in on the emission-based parking charges decision, the Scrutiny & Overview Committee focussed on the three areas highlighted in the call-in as being of concern. These were to seek reassurance that the charges were not being introduced as a fiscal measure and to gain a greater understanding of the environmental and economic impact from the introduction of the new charges.

- 3.2 Having questioned the Cabinet Member and officers on these three areas, the Committee reached a number of conclusions. Firstly, in principle there was support for the introduction of the new Emission-Based Parking Charge Policy.
- 3.3 Regarding concern raised in the call-in that the policy was being introduced as a fiscal measure, the Committee found that work to develop the policy had begun in 2018 in response to the Mayor of London's Transport Strategy. It had also been intended to introduce the scheme earlier in 2020-21, but work had been delayed due to the covid-19 pandemic. As such it was concluded that the parking charges had not been increased as a result of the Council's financial position.
- 3.4 Although the policy was supported, some members of the Committee remained sceptical about the existence of evidence to demonstrate that the introduction of the new charges would make a demonstrable improvement to air quality in the borough and felt that this should be monitored to ensure that the policy was achieving its intended outcomes. It was also suggested that other biodiverse schemes could be explored to offset against pollution from vehicles.
- 3.5 On the potential economic impact from the introduction of the emission-based parking charges, the Committee was concerned that there was not enough data to indicate how the removal of free bays would impact upon local district centres, particularly those that relied on passing trade. As such the Committee agreed that it would refer the decision to Cabinet to explore in further detail the potential impact from the removal of free bays and to consider whether there was evidence to indicate that free parking should be retained in any district centres.

Referral from the Scrutiny & Overview Committee

- 3.6 The Committee agreed to refer the decision to the Cabinet for further consideration on the following grounds:-
1. That the decision to remove all free parking bay should be reconsidered to explore the opportunity for a more tailored approach which allowed for the retention of free parking in district centres where evidence indicated it would be beneficial to the local economy.
 2. That a data led review be conducted of the impact from the new emission-based parking charges be undertaken after an appropriate timeframe, with the outcome reported back to the members of the Scrutiny & Overview Committee.

4. RESPONSE FROM THE CABINET MEMBER FOR SUSTAINABLE CROYDON

- 4.1 The original aim of the decision was to ensure that all areas in the Borough are subject to consistent and appropriate car parking charges that encourage

the adoption of low emission vehicles and increase the desirability of sustainable modes of travel.

- 4.2 Where parking charges are currently levied then the applicable charges will be uplifted in line with the two key decisions affecting our published parking charges, the key decisions were:
Key Decision No.: 5120ETR - Parking charges review January 2021
Key Decision No.: 0220PL - EMISSION-BASED PARKING CHARGES
- 4.3 Regarding those areas where the Borough offers 30min and 1 hour free parking I am keen to balance the meeting of policy goals with needs of local businesses and affected groups.
- 4.4 It is anticipated that the report to TMAC will be presented in Spring/ Summer 2021.

5. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 5.1 Implementing the decision subject to this Scrutiny Call-in commits the Council to £150k capital expenditure and (£225k) income in-year, this being the combined total of the parking charge increase combined with the effect of the emissions based charges. The full-year income effect in 2021/22 is forecast to be (£2700k), on the same basis as the in-year figures.
- 5.2 The details of revenue and capital consequences are described in the report to Executive Director of Place on 12 November 2020¹ and are approved on behalf of the Director of Finance, Investment and Risk and S151 Officer.

6. LEGAL CONSIDERATIONS

- 6.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that Sections 6, 35C, 45, 46,, 46A, 47, 49, 124 and Part IV of Schedule 9 of the Road Traffic Regulation Act 1984 (RTRA) provides the Council with the power to implement the changes proposed in this report. This legislation gives a local authority the power to make Traffic Management Orders (TMO) to control parking by designating on-street and off-street parking places, charging for their use and imposing waiting and loading restrictions on vehicles of all or certain classes at all times or otherwise.
- 6.2 By virtue of section 122 of the RTRA, the Council must exercise its powers under that Act so as to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway. These powers must be exercised so far as practicable having regard to the following matters:-

- the desirability of securing and maintaining reasonable access to premises.
- the effect on the amenities of any locality affected including the regulation and restriction of heavy commercial traffic so as to preserve or improve amenity.
- the national air quality strategy.
- the importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles.
- any other matters appearing to the Council to be relevant.

6.3 The High Court has confirmed that the Council must have proper regard to the matters set out at s 122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision.

6.4 Finally it should be noted that the Courts have been clear that the Road Traffic Regulation Act 1984 is not a fiscal measure and does not authorise a local authority to use its powers to charge local residents for parking in order to raise surplus revenue for other transport purposes.

6.5 When designating and charging for parking places the authority should be governed solely by the section 122 purpose. There is in section 45 no statutory purpose specifically identified for charging. Charging may be justified provided it is aimed at the fulfilment of the statutory purposes which are identified in section 122 (broadly referred to as “traffic management purposes”). Such purposes may include but are not limited to, the cost of provision of on-street and off-street parking, the cost of enforcement, the need to “restrain” competition for on-street parking, encouraging vehicles off-street, securing an appropriate balance between different classes of vehicles and users, and selecting charges which reflect periods of high demand. What the authority may not do is introduce charging and charging levels for the purpose, primary or secondary, of raising section 55(4) revenue.

Approved by, Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer.

7. HUMAN RESOURCES IMPACT

7.1 The recommendations in this report do not have any human resources implications. The implementation project calls for a temporary 6-week internal secondment, which will be met from existing budgets and can present a personal development opportunity for a member of staff. Any additional HR issues which arise other than in the planned budget and establishment will be managed under the Council’s policies and procedures.

Approved by: Jennifer Sankar, Head of HR Place & GSE on behalf of Sue Moorman, Director of HR

8. EQUALITIES IMPACT

- 8.1 The Equality Act 2010 introduced the Public Sector Equality Duty. This requires all public bodies, including local authorities, to have due regard to the need to:
- a) Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
 - b) Advance equality of opportunity between people who share a protected characteristic and those who do not.
 - c) Foster good relations between people who share a protected characteristic and those who do not.
- 8.2 The Equalities Impact Assessment (EqIA) is attached in Appendix 4. The assessment has not identified unacceptable adverse effects on one or more protected groups that are not justified or could reasonably be further mitigated. The advantages of the proposal outweigh the disadvantages and do not lead to unlawful discrimination. This conclusion will be subject to ongoing monitoring of feedback received once the proposal is implemented.
- 8.3 The prior engagement and consultation results have found that no individual protected sub-group stands out as having responded negatively to the principles behind emission-based parking charges – in terms of impact on their protected characteristics. There has been some elevated concern about insufficiency in accessible parking bays for individuals with a disability, with an essential car use need, and that they may have to start paying for parking. These concerns are recognised and mitigated in the Parking Policy actions plan and are supported by the currently proposed revision of parking charges. The recommendation does not introduce parking charges for disabled Blue Badge or Companion Badge holders.
- 8.4 Influencing the overall number of cars parked on the roads in the borough, and in parking congested P&D zones in particular, can help improve access for all protected groups with essential car needs, hence improve their ability to travel and participate where participation is currently disproportionately low.
- 8.5 Active encouragement of lower emission vehicles and the underlying reduction in car use, benefits all individuals, families and neighbourhoods. Air pollution disproportionately impacts on the most vulnerable in the population, in particular the sick, young and elderly. Those at higher risk include those with existing respiratory problems and chronic illnesses such as asthma and chronic obstructive pulmonary disease.
- 8.6 There is currently no evident information to suggest that the emission-based parking charges will have a disproportionate impact on people with protected characteristics (as covered by the Equality Act).
- 8.7 It is considered that the reasons for introducing emission-based parking charges outweighs any reasons for not implementing them.

Approved by: Yvonne Okiyo, Equalities Manager

9. ENVIRONMENTAL IMPACT

- 9.1 The emission-based parking charges are designed to contribute to the Air Quality Actions Plan.

10. CRIME AND DISORDER REDUCTION IMPACT

- 10.1 There are no foreseeable impacts on this.

11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 11.1 Existing P&D bay parking charges and the existence of free parking bays are ineffective in influencing car emissions and car use. As a consequence, the Council sub-optimally meets its traffic management duties.
- 11.2 The report to be submitted to TMAC will seek to address this disparity.
- 11.3 The consultation has not identified any material reasons, or alternatives, for not introducing the emission-based parking charges as proposed. In summary, the duties to the National Air Quality Strategy and the Mayor's Transport Strategy are considered to outweigh the concerns associated with encouraging a switch to lower emission vehicles and reduced car use.

12. OPTIONS CONSIDERED AND REJECTED

- 12.1 The alternative option to do nothing would be a lost opportunity for making a contribution to the Air Quality Actions Plan. This would fall short of the obligations under nationally and regionally devolved responsibilities for improving the Borough's air quality and public health, including the Mayor's Transport Strategy objective to reduce car dependency. It would also be a lost opportunity to increase turnover in parking events in the district high streets and address access for mobility impaired groups.
- 12.2 The consultation has received representations for the introduction of a London ULEZ-type road charging scheme, instead of introducing the proposed emission-based parking charges. The Central London type congestion charging is very complex and expensive to operate. Such a solution would need to be joined up to a London-wide scheme. The London Mayor does not currently have any plan for extending the ULEZ to Croydon. The Mayor instead requires the outer boroughs to define and implement their own schemes, whether they call it ULEZ or something else and to use measures that are appropriate for local conditions. Considering that every car journey starts and ends with a parking space, the parking charges structure is considered to be an important means to influencing car ownership and use in Croydon.

CONTACT OFFICER:

Steve Iles, Director of Public Realm

BACKGROUND PAPERS

1. [Report To: Executive Director Of Place 9 September 2020 Subject: Emissions-Based Destination Parking Charges From 1 January 2021](#)
2. [Cabinet - Monday, 25th March, 2019 6.30 pm \(item 28/19\)](#)
3. [Parking Policy 2019 to 2022](#)
4. [Traffic Management Act 2004: network management in response to COVID-19](#)
5. [Traffic Management Advisory Committee - Wednesday, 14th October, 2020 6.30 pm](#)
6. [Report To: Executive Director Of Place, 12 November 2020, Subject: Outcome Of Consultation On Emissions-Based Destination Parking Charges From 1 January 2021](#)

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