

Croydon Council

Equality Analysis Form

Stage 1 Initial Risk Assessment - Decide whether a full equality analysis is needed

At this stage, you will review existing information such as national or local research, surveys, feedback from customers, monitoring information and also use the local knowledge that you, your team and staff delivering a service have to identify if the proposed change could affect service users from equality groups that share a “protected characteristic” differently. You will also need to assess if the proposed change will have a broader impact in relation to promoting social inclusion, community cohesion and integration and opportunities to deliver “social value”.

Please note that the term ‘change’ is used here as shorthand for what requires an equality analysis. In practice, the term “change” needs to be understood broadly to embrace the following:

- Policies, strategies and plans
- Projects and programmes
- Commissioning (including re-commissioning and de-commissioning)
- Service Review
- Budgets
- Staff structures (including outsourcing)
- Business transformation programmes
- Organisational change programmes
- Processes (for example thresholds, eligibility, entitlements, and access criteria)

You will also have to consider whether the proposed change will promote equality of opportunity; eliminate discrimination or foster good relations between different groups or lead to inequality and disadvantage. These are the requirements that are set out in the Equality Act 2010.

1.1 Analysing the proposed change

1.1.1 What is the name of the change?

Culture Plan 2019 - 24

1.1.2 Why are you carrying out this change?

Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

It is an exciting and pivotal time for cultural activity in Croydon – we are nearing the re-opening of Fairfield Halls and have started work on design work for a significant refurbishment to the central Clocktower building (including the Museum of Croydon and Central Library), which, alongside associated cultural investment via the Growth Zone and the recent allocation of GLA Creative Enterprise Zone funds, means there is an unprecedented focus on our cultural capital. In addition, the level of cultural activity and programming is growing across the borough, from an explosion of street art to a burgeoning music production scene.

It is now necessary to clearly define the role and value of culture for Croydon in a coherent cultural plan, clarifying the objectives of our investment in cultural activities, and the benefits and impact we intend this to achieve.

1.1.3 What stage is your change at now?

See **Appendix 1** for the main stages at which equality analyses needs to be started or updated.

Culture Plan developed and being presented to cabinet/full council for approval.

Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected by the change and how**1.2.1 Who are your internal and external stakeholders?**

For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

Internal – 3 direct staff in the culture team; 7 staff in museum and archives; along with a number of officers who work on associated activities, programming and fundraising, including a particular focus on the libraries service, regeneration, the community and voluntary sector team, youth engagement and the growth zone.

External:

- All residents
- Community groups and networks
- Business networks
- Funders
- Arts Council, Heritage England, GLA and DCMS

1.2.2 What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?

The plan will:

- Ensure all residents can access rich cultural experiences of all scales as part of their everyday lives, so we see an increase in the number of participants in the Borough's cultural offer, and enable all communities to be active partners in programmes, exhibitions and collections of the Clocktower and Museum
- Support work that targets differently disadvantaged groups across Croydon through our grant aid and developmental opportunities
- Identify barriers to participation and challenges, so that activities can include everyone and we are able to monitor impact, take on feedback and continuously improve our outreach
- Embrace the diverse nature of our borough, supporting events that represent our various communities, such as Croydon PrideFest and Croydon Mela
- Build more activity and cultural programming in accessible places across the borough, across all our neighbourhoods and town centres, including working with our libraries service

and youth engagement team to reach out to residents

- Ensure that a significant part of Croydon's cultural offer remains free
- Develop partnerships with voluntary and community sector organisations to build capacity and resilience in our cultural sector and encourage participation from all residents, ensuring equal access to cultural opportunities, with a particular focus on involvement and cultural production by our young people.
- Increase the number of apprenticeships and training for employment opportunities available across the Cultural Sector, including maximizing the opportunities of the Creative Enterprise Zone programme to increase the size, and scope of our creative and cultural industries
- Increase accessibility to Croydon's Cultural Partnerships Fund and our Youth Arts Fund, and use culture to leverage further external funding and support our case for inward investment, improving Croydon's profile and ensuring an attractive cultural offer
- Ensure a major and successful events programme contributes to our economy, including the encouragement of a more lively music venue offer and the development of an improved evening and night time economy

1.2.3 Does your proposed change relate to a service area where there are known or potential equalities issues?

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response If you don't know, you may be able to find more information on the Croydon Observatory (<http://www.croydonobservatory.org/>)

Yes – cultural activity and programming can traditionally be seen as exclusive and exclusionary, with barriers to entry ranging from the cost of ticket prices to the lack of accessible venues. The new Culture Plan acknowledges this, and deliberately sets out clear objectives in relation to widening access to cultural activity, breaking down barriers and opening up opportunities for a broad range of groups who are traditionally under-represented in cultural activity and the creative industries.

1.2.4 Does your proposed change relate to a service area where there are already local or national equality indicators?

You can find out from the Equality Strategy <http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf>). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

There is an annual survey 'Active Lives' undertaken by Sport England that covers participation in culture.

1.2.5 Analyse and identify the likely advantage or disadvantage associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a "protected characteristic"

Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	Improved accessibility to key venues and programming, development and embedding of key partnerships with disability arts organisations, including the introduction of Savvy Theatre as the company in-residence at the newly refurbished Fairfield Halls.	None
Race/ Ethnicity	Improved access to and involvement in cultural activity and programming for all residents, including reflecting and representing our BAME population. Build on BAME programming including the London Road Carnival and the Croydon Mela, and provide a new home in the Fairfield Halls for Talawa, the UK's leading black-led touring theatre company. Further develop partnerships with key local BAME community and voluntary sector organisations.	None
Gender	Improved access to and involvement in cultural activity and programming for all. Increasing the involvement of women in cultural engagement and programming, supporting events that promote gender equality such as Cro Cro Land music festival.	None
Transgender	Working to deliver best practice from across the cultural sector in accessibility and involvement for the transgender community, including specific exhibitions and themed cultural programmes within the Croydon Museum and Central Library. Build on the existing success of Croydon Pride which has a focus on our transgender community and supporting other relevant community events.	None
Age	Targets to increase the involvement of young people in planning and creating cultural activity, including specific youth-focused cultural funding. Working with youth organisations to increase youth participation. Ensure all cultural activity is appropriate and accessible to our older population, including designing dementia-friendly activities and	None

	spaces.	
Religion /Belief	Develop partnerships with Croydon's faith networks and build representation in our cultural activity and programming.	None
Sexual Orientation	Working to deliver best practice from across the cultural sector in accessibility and involvement for the LGBTQ community, including specific exhibitions and themed cultural programmes within the Croydon Museum and Central Library. Build on the existing success of Croydon Pride and other LGBT calendar events such as LGBT History Month.	None
Pregnancy and Maternity	Support of family friendly and relaxed events.	None
Social inclusion issues	By providing a comprehensive programme of cultural activities, reaching out to under-represented groups and ensuring there are easily accessible 'bite-size' opportunities for involvement, this plan aims to address some social inclusion issues. There are also some significant programmes targeted to combat social inclusion issues such as the Youth Partnership Performance 3 year programme	None
Community Cohesion Issues	By providing a comprehensive programme of cultural activities, reaching out to under-represented groups and creating opportunities for community groups to collaborate and co-create cultural activity, this plan aims to address some community cohesion issues. Supporting community cultural events that provide opportunities for people to come together in positive celebration as well as celebrate the Borough's diversity.	None
Delivering Social Value	The plan will deliver considerable social value, both from leveraging inward investment and in kind support, building local cultural capital, and creating opportunities for learning, training and employment in the cultural sector in Croydon. The plan will see an increase in the number of apprenticeships and training for employment	None

	opportunities available across the Cultural Sector, including maximizing the opportunities of the Creative Enterprise Zone programme to increase the size, and scope of our creative and cultural industries	
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1.2.6	In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?
	For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation

Croydon has a diverse population which is over 50% BAME, this needs to be reflected in all aspects of the cultural offer.

1.2.7	Would your proposed change affect any protected groups more significantly than non-protected groups?
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....

Yes, as described above, we anticipate a positive impact particularly in relation to the following protected groups, due to improved access and involvement:

- Age
- Race/Ethnicity
- Disability
- Transgender
- Sexual Orientation

1.2.8	As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?
	In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes <i>etc.</i>
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

Yes, the proposed change is likely to help the Council in advancing equality of opportunity between people who belong to any protected groups and those who do not.

The Culture Plan deliberately targets participation by and inclusion of protected groups in the growth of cultural and creative activity in the borough, aiming to increase both involvement and representation of these groups.

1.2.9	<p>As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?</p> <p>In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act</p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.</p>
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Yes, the proposed change is likely to help the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic as it will support, profile and celebrate different communities and create opportunities for a wide range of people to come together to share experiences and diverse cultures.

1.2.10	<p>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?</p> <p>In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.</p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>
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Yes, the proposed change will help the council in fostering good relations between people who belong to any protected groups and those who do not.

The plan will support a range of events and programmes that profile and celebrate our different communities and provide opportunities to bring people together in positive celebration across communities of interests, geographies and faiths.

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
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Decision	Guidance	Response
No, further equality analysis is not required	<p>Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report used in decision making, such as a Cabinet report</p>	The changes proposed will not have any negative impact on any individual or group with a protected characteristic (compared to non-protected groups). There will be some positive impacts as described above.
Yes, further equality analysis is required	<p>Please state why and outline the information that you used to make this decision. Also indicate</p> <ul style="list-style-type: none"> • When you expect to start your full equality analysis • The deadline by which it needs to be completed (for example, the date of submission to Cabinet) • Where and when you expect to publish this analysis (for example, on the council website). <p>You must include this statement in any report used in decision making, such as a Cabinet report.</p>	
Officers that must approve this decision	<p>Name and position</p> <p>Kirsteen Roe, Director of council homes, districts and regeneration</p>	Date
Report author	Caroline Toogood	10/4/2019
Director	Paula Murray, Creative Director – Place	10/4/2019

1.4 Feedback on Equality Analysis (Stage 1)

Please seek feedback from the corporate equality and inclusion team and your departmental lead for equality (the Strategy and Planning Manager / Officer)

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Name of Officer	Yvonne Okiyo	
Date received by Officer	11.04.19	Please send an acknowledgement
Should a full equality analysis be carried out?	No	The plan will not have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups)

Stage 2 Use of evidence and consultation to identify and analyse the impact of the change

Use of data, research and consultation to identify and analyse the probable Impact of the proposed change

This stage focuses on the use of existing data, research, consultation, satisfaction surveys and monitoring data to predict the likely impact of proposed change on customers from diverse communities or groups that may share a protected characteristic.

Please see Appendix 2 (section 2) for further information.

2.1	<p>Please list the documents that you have considered as a part of the equality analysis review to enable a reasonable assessment of the impact to be made and summarise the key findings.</p> <p>This section should include consultation data and desk top research (both local and national quantitative and qualitative data) and a summary of the key findings.</p>
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2.2	<p>Please complete the table below to describe what the analysis, consultation, data collection and research that you have conducted indicates about the probable impact on customers or staff from various groups that share a protected characteristic.</p>
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Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source

2.3	<p>Are there any gaps in information or evidence missing in the consultation, data collection or research that you currently have on the impact of the proposed change on different groups or communities that share a protected characteristic? If so, how will you address this?</p> <p>Please read the corporate public consultation guidelines before you begin: http://intranet.croydon.net/finance/customerservices/customerserviceprogramme/stepbystepguide.</p>
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2.4 If you really cannot gather any useful information in time, then note its absence as a potential disadvantageous impact and describe the action you will take to gather it.

Please complete the table below to set out how will you gather the missing evidence and make an informed decision. Insert new rows as required.

Group's with a "Protected characteristic" and broader community issues	Missing information and description of potential disadvantageous impact	Proposed action to gather information

Stage 3 Improvement plan

Actions to address any potential disadvantageous impact related to the proposed change

This stage focuses on describing in more detail the likely disadvantageous impact of the proposed change for specific groups that may share a protected characteristic and how you intend to address the probable risks that you have identified stages 1 and 2.

3.1 Please use the section below to define the steps you will take to minimise or mitigate any likely adverse impact of the proposed change on specific groups that may share a protected characteristic.

Equality Group (Protected Characteristic)	Potential disadvantage or negative impact e	Action required to address issue or minimise adverse impact	Action Owner	Date for completing action

3.2 How will you ensure that the above actions are integrated into relevant annual

department or team service plans and the improvements are monitored?

3.3 How will you share information on the findings of the equality analysis with customers, staff and other stakeholders?

Section 4 Decision on the proposed change

4.1 Based on the information in sections 1-3 of the equality analysis, what decision are you going to take?

Decision	Definition	Yes / No
We will not make any major amendments to the proposed change because it already includes all appropriate actions.	Our assessment shows that there is no potential for discrimination, harassment or victimisation and that our proposed change already includes all appropriate actions to advance equality and foster good relations between groups.	
We will adjust the proposed change.	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change. We are going to take action to make sure these opportunities are realised.	
We will continue with the proposed change as planned because it will be within the law.	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed 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.	
We will stop the proposed change.	The proposed change would have adverse effects on one or more protected groups that are not justified and cannot be lessened. It would lead to unlawful discrimination and must not go ahead.	

4.2 Does this equality analysis have to be considered at a scheduled meeting?

If so, please give the name and date of the meeting.

4.3 When and where will this equality analysis be published?

An equality analysis should be published alongside the policy or decision it is part of. As well as this, the equality assessment could be made available externally at various points of delivering the change. This will often mean publishing your equality analysis before the change is finalised, thereby enabling people to engage with you on your findings.

4.4 When will you update this equality analysis?

Please state at what stage of your proposed change you will do this and when you expect this update to take place. If you are not planning to update this analysis, say why not

4.5 Please seek formal sign of the decision from Director for this equality analysis?

This confirms that the information in sections 1-4 of the equality analysis is accurate, Comprehensive and up-o-date.

Officers that must approve this decision	Name and position	Date
Head of Service / Lead on equality analysis		
Director		

Email this completed form to equalityandinclusion@croydon.gov.uk, together with an email trail showing that the director is satisfied with it.