

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

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|---|--|
| Directorate | Resources |
| Title of proposed change | Property Disposals as part of the Interim Asset Disposal Strategy |
| Name of Officer carrying out Equality Analysis | Steve Wingrave |

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

The Council is proposing to dispose of a number of assets as part of the Interim Disposal Strategy to help generate income in line with the MTFS and enable the Council to continue to deliver its key services. This proposal is for the disposal of part of the former CALAT site to allow the provision of a Renal Dialysis Centre

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. 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 Additional information needed to determine impact of proposed change

Table 1 – 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.

| Additional information needed | Information source | Date for completion |
|--|-----------------------------|----------------------------|
| The proposed Disposal is for a vacant property that formerly accommodated CALAT and was more recently occupied by residential guardians to help secure the site. The guardians have now moved out and the site is vacant. The disposal will not impact the delivery of services by the Council as it has previously been declared surplus to requirements or is non-operational. This report covers the disposal of part of the former CALAT site at Malcolm Road, Coulsdon. The remainder of the site has already been approved for disposal to provide a new medical centre | Asset Management/ELT | November 2021 |

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.2 Deciding whether the potential impact is positive or negative

Table 2 – 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 judgment where possible.

| Protected characteristic group(s) | Positive impact | Negative impact | Source of evidence |
|-----------------------------------|---|-----------------|-----------------------|
| Age | The proposed changes will not impact any protected characteristic group as the building is vacant and has been declared surplus to requirements | None | Asset Management Team |
| Disability | -The proposed Disposal for a new Renal dialysis centre will help to provide new facilities for patients needing treatment | None | As above |
| Gender | The proposed changes will not impact any protected characteristic group as the building is vacant and has been declared surplus to requirements | None | As above. |
| Gender Reassignment | The proposed changes will not impact any protected characteristic group as the building is vacant and has been declared surplus to requirements | None | As above. |
| Marriage or Civil Partnership | The proposed changes will not impact any protected characteristic group as the building is vacant and has been declared surplus to requirements | None | As above. |
| Religion or belief | The proposed changes will not impact any protected characteristic group as the building is vacant and has been declared surplus to requirements | None | As above. |

| | | | |
|------------------------|---|------|-----------|
| Race | The proposed changes will not impact any protected characteristic group as the building is vacant and has been declared surplus to requirements | None | As above. |
| Sexual Orientation | The proposed changes will not impact any protected characteristic group as the building is vacant and has been declared surplus to requirements | None | As above. |
| Pregnancy or Maternity | The proposed changes will not impact any protected characteristic group as the building is vacant and has been declared surplus to requirements | None | As above. |

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.

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 |

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Table 5 – Impact scores

| <p>Column 1</p> <p>PROTECTED GROUP</p> | <p>Column 2</p> <p>LIKELIHOOD OF IMPACT SCORE</p> <p>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.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p> | <p>Column 3</p> <p>SEVERITY OF IMPACT SCORE</p> <p>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.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p> | <p>Column 4</p> <p>EQUALITY IMPACT SCORE</p> <p>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.</p> <p>Equality impact score = likelihood of impact score x severity of impact score.</p> |
|--|--|---|---|
| Age | 1 | 1 | 1 |
| Disability | 2 | 3 | 6 (in a positive way) |
| 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 |

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

Table 5 – 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 | No Negative Impact | | | |
| Race | No Negative Impact | | | |
| Sex (gender) | No Negative Impact | | | |
| Gender reassignment | No Negative Impact | | | |
| Sexual orientation | No Negative Impact | | | |
| Age | No Negative Impact | | | |
| Religion or belief | No Negative Impact | | | |
| Pregnancy or maternity | No Negative Impact | | | |

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|----------------------------|--------------------|--|--|--|
| Marriage/civil partnership | No Negative Impact | | | |
|----------------------------|--------------------|--|--|--|

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. The proposed disposal will change the current use of this asset but in a very positive way as it is currently vacant. The letting to the dialysis centre will benefit patients and provide a fit for purpose and accessible facility that provides a much better proposition than the previous centre and reduce travel times and distances for Croydon residents based on the current short term arrangements | 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. | |

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| Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet Yes. | Meeting title: Cabinet Date: 15 November 2021 |
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7. Sign-Off

| Officers that must approve this decision | |
|--|--|
| Equality lead | Name: Denise McCausland Date: 29 October 2021 Position: Director for Policy & Partnerships |
| Director | Name: Peter Mitchell Date: 2 November 2021 Position: Interim Director of Commercial Investment and Capital |