

# Equality Analysis Form

Delivering for Croydon

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## 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

<b>Directorate</b>	<b>Planning &amp; Sustainable Regeneration - Spatial Planning, Place</b>
<b>Title of proposed change</b>	<b>New Supplementary Planning Document South Norwood Conservation Area Appraisal and Management Plan</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Robert Buckley</b>

## 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 South Norwood Conservation Area Appraisal and Management Plan ( CAAMP) will replace the existing CAAMP and is intended to provide guidance to both people making planning applications and also to Council planning officers when it comes to making decisions. South Norwood CAAMP is not a policy document but provides guidance, information, clarification and amplifies how the Council's Local Plan policies should be applied to planning applications.

This EQIA does **NOT** apply to the Council's adopted Local Plan. The Local Plan EQIA is a separate approved document.

This EQIA has been undertaken to assess the impact of the adoption of a new South Norwood CAAMP on equality issues and takes account of the publication of the new Equality Strategy 2020-2024.

## 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	No Specific Positive Impacts identified	Those making planning applications will typically be older as they will usually be property/business owners.	<p><a href="https://www.gov.uk/government/statistics/english-housing-survey-2017-to-2018-headline-report">https://www.gov.uk/government/statistics/english-housing-survey-2017-to-2018-headline-report</a></p> <p>Average of UK first time buyer is 33</p> <p><u>Age Profile Data</u> ( source ONS/Croydon Observatory)</p> <p>South Norwood: 0- 15 ,23.4%;16-64, 66%;65+ 10.6%  Woodside: 0-15, 22.6%; 16-64, 67.5%;65+9.9%  England: 0-15, 19.2%; 16-64,62.3%; 65+ 18.5%</p> <p>Conclusion, both wards have a younger age profile than the England average.</p>
Disability	No Specific Positive Impacts identified	No significant negative impact has been identified.	<p>ONS census data 2011 provides data on peoples ability to perform day to day activities and the degree to which they feel limited due to health</p> <p>South Norwood- 85% not limited in their activity  Woodside- 85.5% not limited in their activity  England 82.4%</p> <p>Conclusion. An above average amount of residents feel some limitation due to health issues. The Croydon average for same is 85.4%</p>
Sex	No Specific Positive Impacts identified	No significant negative impact has been identified.	<p>Woodside 8,909 (52.8%)  Female population estimate (2020)  7,975 (47.2%)  Male population estimate (2020)</p> <p>South Norwood 8,777</p>

			<p>(52.5%) Female population estimate (2020) 7,955 (47.5%) Male population estimate (2020)</p> <p>Census 2011 states Females are 51% of population and therefore both wards are slightly above the England average</p>																
Gender Identity Reassignment	No specific positive impacts have been identified.	No significant negative impact has been identified.	No local data available																
Marriage or Civil Partnership	No specific positive impacts have been identified.	No significant negative impact has been identified.	South Norwood- Married 31.9% England 64% Woodside																
Religion or belief	No specific positive impacts have been identified.	No significant negative impact has been identified.	<p><u>Has Religion</u> Woodside 73% South Norwood 70.3% England 68.1%</p> <p>ONS Census 2011</p>																
Race	Enhancement awareness of local heritage	<p>1. People described as 'Asian' or 'Black' are less likely to engage with heritage than people with 'White' ethnicity</p> <p>2. Young people of Black Caribbean origin have relatively low levels of heritage engagement; 39% compared to 59% for white young people</p>	<p>1. (DCMS, Taking Part Survey Adult Report, 2018/2019) 2. (Arts Council, 2017)</p> <p>Population Minority Groups 2011: Croydon Observatory</p> <p>Woodside</p> <table> <tr> <td>Asian/Asian British %</td> <td>9.4</td> </tr> <tr> <td>Black/African/Caribbean/Black British %</td> <td>34.2</td> </tr> <tr> <td>Mixed/multiple ethnic groups %</td> <td>9.7</td> </tr> <tr> <td>Other ethnic group %</td> <td>1.7</td> </tr> </table> <p>South Norwood</p> <table> <tr> <td>Asian/Asian British %</td> <td>10.1</td> </tr> <tr> <td>Black/African/Caribbean/Black British %</td> <td>38.5</td> </tr> <tr> <td>Mixed/multiple ethnic groups %</td> <td>9.3</td> </tr> <tr> <td>Other ethnic group %</td> <td>1.8</td> </tr> </table>	Asian/Asian British %	9.4	Black/African/Caribbean/Black British %	34.2	Mixed/multiple ethnic groups %	9.7	Other ethnic group %	1.7	Asian/Asian British %	10.1	Black/African/Caribbean/Black British %	38.5	Mixed/multiple ethnic groups %	9.3	Other ethnic group %	1.8
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Sexual Orientation	No specific positive impacts have been identified.	No significant negative impact has been identified.	No data on sexuality in 2011 Census or Croydon Observatory
Pregnancy or Maternity	No specific positive impacts have been identified.	No significant negative impact has been identified.	No local data

**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
None identified		

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**

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	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
<b>Likelihood of Impact</b>				

**Key**

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

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**Table 3 – Impact scores**

Column 1 <b>PROTECTED GROUP</b>	Column 2 <b>LIKELIHOOD OF IMPACT SCORE</b>	Column 3 <b>SEVERITY OF IMPACT SCORE</b>	Column 4 <b>EQUALITY IMPACT SCORE</b>
	<p>Use the key below to <b>score</b> the <b>likelihood</b> of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b></p>	<p>Use the key below to <b>score</b> the <b>severity</b> 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><b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b></p>	<p>Calculate the <b>equality impact score</b> 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><b>Equality impact score = likelihood of impact score x severity of impact score.</b></p>
Age	2	2	4
Disability	1	1	1
Sex	1	1	1
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	2	2	4
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	1	1	1

## 4. Statutory duties



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### 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.

The proposed policies will assist in advancing equality of opportunity and good relations between people who belong to protected groups and in other areas will have no specific impact on people who belong to protected groups.

## 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:

The proposed policies are generally assessed to have positive or neutral impacts on people from protected groups and any potential negative impacts have been assessed to have a low equality impact score. No specific actions have been identified as necessary.

**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	N/A	N/A	N/A	Collect data through future engagement TBC

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Race	Low engagement with heritage among ethnic minority groups	The enhanced engagement during the consultation process publicised events, such as the public event ,through local groups who have established links with local minority groups.This included We Love SE25 and Soccocheta. A number of members of local minority ethnic groups attended	N/A	Collect data through future engagement TBC
Sex (gender)	N/A	N/A	N/A	Collect data through future engagement TBC
Gender reassignment	N/A	N/A	N/A	Collect data through future engagement TBC
Sexual orientation	N/A	N/A	N/A	Collect data through future engagement TBC
Age	Age of property owners and those engaging with heritage generally as residents groups and amenity groups have an older demographic	Age of property owners is beyond scope of CAAMP. Engaging younger people however was part of the Enhanced Engagement activities and the Community Plan for the South Norwood Regeneration Programme, of which the CAAMP is a project. This involved publicising events through partnership organisations such as We Love SE25 and Soccocheta. Over 100 people attended the consultation event and a wide range of ages observed.	N/A	Collect data through future engagement TBC

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Religion or belief	N/A	N/A	N/A	Collect data through future engagement TBC
Pregnancy or maternity	N/A	N/A	NA	Collect data through future engagement TBC
Marriage/civil partnership	N/A	N/A	N?A	Collect data through future engagement TBC

### 6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter <b>X</b> in column 3 ( <b>Conclusion</b> ) 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. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</b>	
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. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b>  <b>Data on protected categories will be collected at future opportunities for engagement in relation to the South Norwood Conservation Area.</b>	<b>X</b>
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. <b>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.</b>	

## Equality Analysis

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: 6 July 2022	

### 7. Sign-Off

<b>Officers that must approve this decision</b>	
<b>Equalities Lead</b>	<b>Name: Denise McCausland Position: Equalities Programme Manager 21 June 2022</b>
<b>Director</b>	<b>Name: Heather Cheesbrough Date: 31 May 2022 Position: Director of Planning &amp; Sustainable Regeneration</b>