

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?

This is an update of the previous Air Quality Action Plan 2012-2017. The updated Air Quality Action Plan will cover from 2017-2022.

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.

Air quality is an important Public health issue in Croydon, it contributes to reduced life expectancy and disproportionately impacts on the most vulnerable people , in particular the young and elderly.

The aim of the Air Quality Action Plan 2017-2022 is to put measures in place to improve the health and wellbeing of everyone living and working in Croydon.

Key measures to be introduced include:-

1. Revise Supplementary Planning Document to include new policies such as:
 - incorporate green infrastructure into policy for all new schools located adjacent to busy roads;
 - incorporate green infrastructure at all new major developments;
 - incorporate requirement for construction sites to utilise new technology for diesel generators.
2. Ensure that Smoke Control Zones are appropriately identified and fully promoted and enforced. The proposed action is to consider the revision of the current smoke control order to cover the whole of the borough, subject to the necessary evidentiary basis and consultation requirements being complied with.
3. Review procurement policy to include Installation of ultralow NOx boilers in council buildings.
4. Cleaner Air Champions - to support through funding to deliver a volunteer programme to tackle local air quality measures.
5. Project to raise awareness of idling vehicles at hotspot areas such as taxi ranks, schools and bus stands.
6. Promote sustainable travel to schools to encourage schools to sign up to the TfL STARS scheme.
7. The Council should lead the way to deliver cleaner fleet and hired fleet to work towards a diesel free fleet.
8. Set up Ecostars project to encourage Private Hirers' Vehicles to be cleaner and greener by 2025,
9. To consider measures to reduce emissions by introducing time restrictions on bonfires subject to consultation requirements being complied with.
10. To investigate installing green screens at schools located along busy main roads.
11. Encourage more pocket parks, play streets and provide more green infrastructure throughout the borough

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.

Current stage of the change – approve the draft action plan following the initial engagement exercise.

The council engaged with the following stakeholders: District Centres and Regeneration Team, Public health, Planning and Strategic Transport, Commissioning and Procurement Team, Healthy Schools, local community groups, vulnerable health groups such as British Lung foundation, local residents, visitors, cycle forum, local businesses, Croydon BID, developers and contractors, freight groups, schools, BAME groups, disability groups and Public Health.

The council held an Air Quality Summit on 26th June 2017 and invited representatives from these groups to attend, in addition we carried out further engagement at Purley Festival, Surrey Street market and Croydon central library.

An air quality survey was developed on 'Get Involved' and was advertised on the plasma screens in the lift lobby and in access Croydon, a link to the survey was placed on the council's website with regular tweets being distributed by the communications team, in addition press releases were issued.

The engagement process ran from 26th June 2017 to 21st August 2017. In total with responses to the survey and the various engagement activities we achieved 599 responses. Overall the results from the survey were very positive, 89% considered that air quality is an important issue.

The air quality survey also asked the respondents did air pollution affect their health and also provide information whether they had chronic obstructive pulmonary disease (COPD) asthma or other heart and lung problems and how this affected their daily life. There were 190 responses the majority said they had breathing difficulties and that they were affected by air pollution many found that their symptoms were exacerbated by air pollution

The findings of the survey have be incorporated in the action plan. Any equality implications will be outlined in the action plan and assess the proposed actions to mitigate any negative impacts that have identified.

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.

Council staff – Pollution Team, District Centres and Regeneration Team, Public health, Planning and Strategic Transport, Commissioning and Procurement Team, Healthy Schools

Local community groups such as ‘Breathe Easy’

Cycle Forum

Local Businesses such as Croydon BID

Developers

Construction companies and developers

Residents and visitors

Freight companies

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 aim of the Air Quality Action Plan is:

- To secure a safer, cleaner and greener borough**
- To secure a good start in life for residents and children in the borough To make Croydon a great place to work, learn and live**
- To improve the environmental wellbeing of our residents and communities**

- To promote environmental sustainability
- To protect children and vulnerable people from harmful effects of air pollution
- To contribute to increasing healthy life expectancy and reducing early death from cardio-respiratory diseases

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

The North of the borough which has higher levels of deprivation also experiences disproportionately higher levels of air pollution. (see 1.2.6 below)

The actions in the plan are proposed to improve air quality in the whole of the borough however we will be investigating putting together a package of measures in hotspot areas such as London Road at Croydon university hospital and at schools that are located adjacent to busy main roads. These actions include:

- Idling vehicle checks
- Awareness raising at local schools
- Increase the air pollution monitoring network in this area
- Promote local walking maps for the area to encourage more walking
- Investigate providing green infrastructure in areas to encourage people to walk and cycle more

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

No the pollution team are not aware of local or national equality indicators for air quality

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 information provision will enable people who are most negatively impacted by poor air quality to take appropriate measures to limit their exposure and protect their health and well-	None identified

	being. Advice and information will be targeted at the most vulnerable people e.g. those suffering with respiratory conditions. Actions to improve air quality will have a beneficial impact for all residents and visitors to Croydon.	
Race/ Ethnicity	Actions to improve air quality will have a beneficial impact for all residents and visitors to Croydon.	None identified
Gender	Actions to improve air quality will have a beneficial impact for all residents and visitors to Croydon.	None identified
Transgender	Actions to improve air quality will have a beneficial impact for all residents and visitors to Croydon.	None identified
Age	Actions to improve air quality will have a beneficial impact for all residents and visitors to Croydon.	None identified
Religion /Belief	Actions to improve air quality will have a beneficial impact for all residents and visitors to Croydon.	None identified
Sexual Orientation	Actions to improve air quality will have a beneficial impact for all residents and visitors to Croydon.	None identified
Pregnancy and Maternity	Actions to improve air quality will have a beneficial impact for all residents and visitors to Croydon.	None identified
Social inclusion issues	Actions to improve air quality will have a beneficial impact for all residents and visitors to Croydon.	None identified
Community Cohesion Issues	n/a	None identified
Delivering Social Value	Actions to improve air quality will have a beneficial impact for all residents and visitors to Croydon.	None identified

1.2.6	<p>In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?</p> <p>For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation</p>
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There is a close link between areas of high deprivation and pollution. Research has demonstrated that those living in more deprived areas are exposed to higher concentrations of air pollution, often because homes and residences of these groups are situated closer to roads with higher concentrations of emissions. Residents in the north of the borough are impacted by disproportionately high levels of deprivation and air pollution compared to residents in the south of the borough.

We will work in close partnership with Public Health to develop and implement appropriate actions that deliver benefits to vulnerable people in Croydon.

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.....

No – Actions proposed to improve air quality will be beneficial to all residents and visitors to Croydon.

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 *etc.*

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

No
Some actions will focus on 'hot spot' areas these are areas with high air pollution, high levels of human exposure and future predicted air quality trends. However any actions taken to reduce air pollution will have a positive effect on the borough as a whole and will not hinder the council in advancing equality of opportunity for all.

1.2.9 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?

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

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

No
The aim of the proposed change is to achieve better air quality for the borough and surrounding areas. In considering options and funding decisions care will be taken to ensure fairness, equality and compliance with our statutory duties under the Equality Act 2010.

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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Improved air quality will have a beneficial impact on people belonging to all protected groups. The main outcomes and benefits from the proposed change is to make Croydon a secure and safer, cleaner and greener borough and make it a great place to work, learn and live. The actions are aimed at improving the environmental wellbeing of our residents and communities and to protect children and vulnerable people from harmful effects of air pollution. By tackling air quality this would contribute to increasing healthy life expectancy and reducing early death from cardio-respiratory diseases.

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
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>	<p>It is not proposed to undertake a full Equality Analysis at this stage as no detrimental impacts have been identified for groups that share a protected characteristic. The position will be kept under review and in the event that any detrimental impacts are identified throughout the process of implementing actions in the action plan work will be undertaken to develop mitigating actions and this equality assessment will be updated as necessary.</p>

Decision	Guidance	Response
Yes, further equality analysis is required	Please state why and outline the information that you used to make this decision. Also indicate <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). You must include this statement in any report used in decision making, such as a Cabinet report.	
Officers that must approve this decision	Name and position	Date
Report author		
Director		

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)

Please see section 1.3 above

Name of Officer	Norman Vaciannia	26 October 2017
Date received by Officer		Please send an acknowledgement
Should a full equality analysis be carried out?		Note the reasons for your decision

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.asp.</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.
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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.
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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
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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-to-date.
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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.		