

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	Resources
Title of proposed change	Letting of 5th Floor in Bernard Weatherill House
Name of Officer carrying out Equality Analysis	Steve Wingrave

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

This report recommends the letting of the 5th floor of BWH to the London Ambulance Service. A decision has already been taken to release surplus space within the building and the latest letting builds on the earlier release of space on 9-12th floors. The release of space has been possible through the adoption of more flexible working practice by the Council giving employees the ability to work from home or other locations that better accommodates their needs as well as those of the business. The policy allows for individual requirements to be met in the same way as previously with special adaptations being accommodated within the retained space

The lettings are in line with the Improvement and Assurance Panels requirements for the Council to demonstrate that they are disposing of all non-essential assets and making best use of any retained space to help reduce the current level of borrowing and to try and ensure that key services to vulnerable residents can continue to be delivered.

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 letting will have no real impact as the space is being released as a consequence of the flexible working style adopted by the Council following staff consultation and reflects their preferred working style. Where necessary, any special provisions and adaptation/equipment will be provided within the retained space to meet individual needs. An equalities assessment was undertaken as part of the flexible working strategy process and the letting of the space will not	Asset Management	March 2023

cause any additional changes and therefore no further actions are considered necessary		

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 judgement where possible.			
Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	The letting will not directly impact any protected characteristic group as the decision regarding the new flexible working styles and relocation requirements/set-ups have already been taken.	N/A	HR Workforce profile data Please see Appendix 1 for Protected characteristic population data
Disability	The letting will not directly impact any protected characteristic group as the decision regarding the new flexible working styles and relocation requirements/set-ups have already been taken.		As above
Gender	The letting will not directly impact any protected characteristic group as the decision		As above.

	regarding the new flexible working styles and relocation requirements/set-ups have already been taken.		
Gender Reassignment	The letting will not directly impact any protected characteristic group as the decision regarding the new flexible working styles and relocation requirements/set-ups have already been taken.		As above.
Marriage or Civil Partnership	The letting will not directly impact any protected characteristic group as the decision regarding the new flexible working styles and relocation requirements/set-ups have already been taken.		As above.
Religion or belief	The letting will not directly impact any protected characteristic group as the decision regarding the new flexible working styles and relocation requirements/set-ups have already been taken.		As above.
Race	The letting will not directly impact any protected characteristic group as the decision regarding the new flexible working styles and relocation requirements/set-ups have already been taken.		As above.
Sexual Orientation	The letting will not directly impact any protected characteristic group as the decision regarding the new flexible working styles and relocation requirements/set-ups have already been taken.		As above.
Pregnancy or Maternity	The letting will not directly impact any protected characteristic group as the decision regarding the new flexible working styles and relocation requirements/set-ups have already been taken.		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

Equality Analysis

Table 5 – Impact scores

Column 1 PROTECTED GROUP	Column 2 LIKELIHOOD OF 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	Column 3 SEVERITY OF IMPACT SCORE 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	Column 4 EQUALITY IMPACT SCORE 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	2	1	2
Disability	2	1	2
Gender	2	1	2
Gender reassignment	2	1	2
Marriage / Civil Partnership	2	1	2
Race	2	1	2
Religion or belief	2	1	2
Sexual Orientation	2	1	2
Pregnancy or Maternity	2	1	2

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

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	N/A		Steve Wingrave	
Race	N/A			
Sex (gender)	N/A			
Gender reassignment	N/A			
Sexual orientation	N/A			
Age	N/A			
Religion or belief	N/A			
Pregnancy or maternity	N/A			

Equality Analysis

Marriage/civil partnership	N/A		
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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. There will be no major changes for staff working from BWH or to the services delivered as a result of the letting of the 5 th floor. The income will help the Council to deliver services to vulnerable residents and is therefore more likely to have an indirect positive impact have a positive impact	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.	

Equality Analysis

Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet No.	Meeting title: Decision under special urgency provisions Date: 15 March 2023
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7. Sign-Off

Officers that must approve this decision			
Equality lead	Name:	Denise McCausland	Date: 15 March 2023
	Position:	Equalities Programme Manager	
Director	Name:	Steve Wingrave	Date: 15 March 2023
	Position:	Assistant Director Property Services	

Appendix One: HR Workforce Data 2021/22.

COUNCIL WIDE DATA AS OF 2020-21

Data based on Headcount of:	Unit
<i>Directly employed workforce over the period 1 April 2020 - 31 March 2021.</i>	3,446

FTE	Workforce
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Equality Analysis

	Unit	Percentage
Full Time	2,808	81.49%
Part Time	638	18.51%
Grand Total	3,446	100.00%

Gender	Workforce	
	Unit	Percentage
Female	2,318	67.27%
Male	1,128	32.73%
Grand Total	3,446	100.00%

Age	Workforce	
	Unit	Percentage
< 18	0	0.00%
18 - 24	53	1.54%
25 - 34	524	15.21%
35 - 44	851	24.70%
45 - 54	918	26.64%
55 - 64	941	27.31%
65 +	159	4.61%
Grand Total	3,446	100.00%

Disability	Workforce	
	Unit	Percentage
Not disabled	2,079	60.33%
Prefer not to say	41	1.19%
Disabled	225	6.53%

Equality Analysis

Not specified/Unknown	1,101	31.95%
Grand Total	3,446	100.00%

Race/Ethnicity (Black, Asian and Ethnic Minority)	Workforce	
	Unit	Percentage
Asian or Asian British - Any other Asian background	42	1.22%
Asian or Asian British - Bangladeshi	16	0.46%
Asian or Asian British - Chinese	6	0.17%
Asian or Asian British - Indian	94	2.73%
Asian or Asian British - Pakistani	28	0.81%
Black or Black British - African	258	7.49%
Black or Black British - Any other Black background	49	1.42%
Black or Black British - Caribbean	378	10.97%
Mixed - Any other mixed background	52	1.51%
Mixed - White and Asian	26	0.75%
Mixed - White and Black African	8	0.23%
Mixed - White and Black Caribbean	45	1.31%
Other - Arab	3	0.09%
Any Other	89	2.58%
Grand Total	1,094	31.75%

Race/Ethnicity (Non-BAME)	Workforce	
	Unit	Percentage
White - Any other White background	121	3.51%
White - English/Welsh/Scottish/Northern Irish/British	1,093	31.72%
White - Gypsy or Irish Traveller	2	0.06%
White - Irish	40	1.16%

Equality Analysis

Grand Total	1,256	36.45%
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Race/Ethnicity (Prefer not to say/No Info)	Workforce	
	Unit	Percentage
Prefer not to say	24	0.70%
Not specified/Unknown	1,072	31.11%
Grand Total	1,096	31.80%

Race/Ethnicity (Total Response Overview)	Workforce	
	Unit	Percentage
Yes - Total Ethnicity Data Response	2,374	68.89%
No - Total Ethnicity Data Response	1,072	31.11%
Grand Total	3,446	100.00%

Religion or Belief	Workforce	
	Unit	Percentage
Buddhist	17	0.49%
Christian	1,183	34.33%
Hindu	64	1.86%
Jewish	8	0.23%
Muslim	98	2.84%
Sikh	13	0.38%
Other	79	2.29%
No religion	572	16.60%
Prefer not to say	265	7.69%
Not specified/Unknown	1,147	33.28%
Grand Total	3,446	100.00%

Equality Analysis

Sexual Orientation	Workforce	
	Unit	Percentage
Bi-sexual	21	0.61%
Heterosexual/Straight	1,855	53.83%
Gay man	32	0.93%
Lesbian/Gay woman	19	0.55%
Other	37	1.07%
Prefer not to say	315	9.14%
Not specified/Unknown	1,167	33.87%
Grand Total	3,446	100.00%

Marriage or Civil Partnership	Workforce	
	Unit	Percentage
Divorced/Dissolved Civil Partnership	128	3.71%
In a registered civil partnership	8	0.23%
Married	734	21.30%
Never married and never had a civil partnership	458	13.29%
Separated, but still legally married/in a civil partnership	29	0.84%
Widowed	10	0.29%
Prefer not to say	61	1.77%
Not specified/Unknown	2,018	58.56%
Grand Total	3,446	100.00%

Gender Reassignment	Workforce	
	Unit	Percentage

Equality Analysis

Yes - Gender identity the same as the gender assigned at birth	1,485	43.09%
No - Gender identity not the same as the gender assigned at birth	14	0.41%
Prefer not to say	24	0.70%
Not specified	1,923	55.80%
Grand Total	3,446	100.00%

Pregnancy or Maternity	Workforce	
	Unit	Percentage
Maternity	39	1.13%
Non-maternity	2,318	67.27%
Grand Total	2,357	68.40%

Data Considerations: **(1) Reporting limitations** - Reporting on pregnancy that is separate from maternity is not possible within current reporting protocols. **(2) Reliability of data** - Although an employee data audit is conducted annually, non-disclosure rates for certain protected characteristics remain high and with that the reliability of any statistical analysis is compromised. **(3) Non-disclosure of information** - There are high levels of non-disclosure across the organisation in multiple categories - **see table below.**

Non-Disclosure/Not Specified Overview	Workforce
	Unit
Disability	1,101
Race/Ethnicity	1,072
Religion or Belief	1,147
Sexual Orientation	1,167
Marriage or Civil Partnership	2,018
Gender Reassignment	1,923

Equality Analysis

Grand Total	8,428
<i>* Total is the number of occasions as opposed to number of employees as the incident of non-disclosure could be by the same employee multiple times.</i>	

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