

Equality Analysis Form

14/06/23

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	Children Young People and Education/Housing.
Title of proposed change	Joint Housing and Children's Social Care Protocol.
Name of Officer carrying out Equality Analysis	Jane Scott-Transformation Lead.

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 new Joint Housing and Children's Social Care Protocol has been developed to address the current position for our Care Experienced Young People when they become homeless. Croydon Council currently requires them to use the same homelessness pathway as others and they can be found to be 'intentionally homeless' if they have left accommodation that the local authority deems suitable. This position does not acknowledge that we are their 'Corporate Parents' and have looked after them for a period of their childhood and remain accountable to supporting and advising them into their early adulthood, currently up to age 25 years.

The Independent Review of Children's Social Care was a commitment from the Governments manifesto to ensure that children and young people get the support that they need. The review launched in March 2021, the findings and recommendations were published on the 23.5.22. The Governments response to the review on the 2.2.23 stated that Local Authorities are required to introduce a stronger safety net against care leaver homelessness and will no longer be able to consider care leavers as 'intentionally homeless'.

A Joint Housing and Childrens Social Care Protocol currently exists from 2001. It requires further development to include the current position in Croydon, recent legislation and the government's response in relation to the Independent Review of Children's Social care related to care leaver homelessness and the removal of intentional homelessness for this group of young people.

The protocol explicitly acknowledges the enate vulnerabilities that Care Leavers can leave care with which may impact upon their ability to sustain a home and tenancy in the community The protocol addresses the joint working partnership approach to preparing and planning the appropriate home with a young person as part of their pathway plan and personalised housing plan which also focusses on contingency planning to ensure

that risks are identified and mitigated against. A focus on preparation and support prior to a Care Leaver moving to live in their new home, particularly during the first year which addresses practical as well as emotional, mental health wellbeing, helping young people to access locality and neighborhood support and also understanding how they can contribute to their community both immediate and more widely. A Joint Housing and Children's Social Care Pathway panel will monitor and review those young people preparing to move to a new home and consider the best options for individual needs. The Pathway panel will analyse the information and feedback from young people to inform future developments.

The following recommendations will be sort from the Mayor and Cabinet.

2.1 To endorse the implementation of the joint protocol.

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	<p>The joint protocol reflects the individual needs of Care Experienced young people (CEYP) which may impact upon their maturation as opposed to just their chronological age. The protocol will also create a greater safety net to promote stability for young people if they experience disruption in their home or locality up to age of 25 years.</p> <p>The evidence source information highlights an inversion in the Census and CEYP population. The CEYP data is representative of the national picture. In addition, the national average age of leaving home is 23 years, (Office of National Statistics 2022). The average age of a CEYP leaving care and living in their own home is 18-21 years. This protocol seeks to address this disparity.</p>		<div data-bbox="1144 560 1774 608" style="border: 1px solid black; padding: 2px;"> <p>Croydon Census Data 21.17-25 Population</p> </div> <div data-bbox="1137 624 1787 911"> </div> <div data-bbox="1144 927 1774 975" style="border: 1px solid black; padding: 2px;"> <p>Croydon CEYP.June 23.</p> </div> <div data-bbox="1137 975 1771 1182"> </div>
Disability	<p>The joint protocol will ensure that Care Experienced young people who have disability needs will experience early</p>		<div data-bbox="1144 1385 1774 1497" style="border: 1px solid black; padding: 5px;"> <p>Data for Disability is currently under review</p> </div>

	<p>identification of preparation and planning with their pathway plan and personalised housing plan to address the specific needs of young people to move to their home and a location that enables them to live independently.</p>																																																				
<p>Sex</p>	<p>The pathway plan and personalized housing plan will consider the needs of each Care Experienced young person according to their sex. Ensuring that plans promote the Care Experienced young person’s individual safety, development, and enjoyment of living in a neighborhood and their own home. The Census and CEYP data informs how our service approach and provision will need to consider the specific attention to the differences in young males who will be in need of housing compared to young women who are CEYP. The overall Croydon population for this age group is more evenly balanced.</p>		<p><u>Croydon Census Data 21.17-25 Population</u></p> <table border="1" data-bbox="1122 437 1787 635"> <thead> <tr> <th>Age</th> <th>All persons</th> <th>Female</th> <th>Male</th> </tr> </thead> <tbody> <tr><td>Aged 17</td><td>4,913</td><td>2,347</td><td>2,566</td></tr> <tr><td>Aged 18</td><td>4,109</td><td>1,909</td><td>2,200</td></tr> <tr><td>Aged 19</td><td>3,583</td><td>1,690</td><td>1,893</td></tr> <tr><td>Aged 20</td><td>3,425</td><td>1,636</td><td>1,789</td></tr> <tr><td>Aged 21</td><td>3,923</td><td>1,956</td><td>1,967</td></tr> <tr><td>Aged 22</td><td>4,405</td><td>2,195</td><td>2,210</td></tr> <tr><td>Aged 23</td><td>4,785</td><td>2,437</td><td>2,348</td></tr> <tr><td>Aged 24</td><td>5,082</td><td>2,541</td><td>2,541</td></tr> <tr><td>Aged 25</td><td>5,168</td><td>2,720</td><td>2,448</td></tr> <tr><td>Aged 17-25</td><td>39,393</td><td>19,431</td><td>19,962</td></tr> </tbody> </table> <p style="text-align: right; font-size: small;">Source: ONS Census 2021</p> <p>Croydon CEYP.June 23.</p> <table border="1" data-bbox="1122 794 1832 992"> <thead> <tr> <th>Female</th> <th>Male</th> <th></th> </tr> </thead> <tbody> <tr> <td>228</td> <td>563</td> <td>791</td> </tr> </tbody> </table>	Age	All persons	Female	Male	Aged 17	4,913	2,347	2,566	Aged 18	4,109	1,909	2,200	Aged 19	3,583	1,690	1,893	Aged 20	3,425	1,636	1,789	Aged 21	3,923	1,956	1,967	Aged 22	4,405	2,195	2,210	Aged 23	4,785	2,437	2,348	Aged 24	5,082	2,541	2,541	Aged 25	5,168	2,720	2,448	Aged 17-25	39,393	19,431	19,962	Female	Male		228	563	791
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<p>Gender Reassignment</p>	<p>The joint protocol will ensure that a Care Experienced young person’s needs will incorporate a careful assessment of their Gender Reassignment needs with regard to establishing a new home in the right environment with a support plan. Access to advise and community links through the LGBT+ statutory and voluntary partners will be incorporated</p>		<p>Data for CEYP in the 17-25 age group is currently not routinely collected.</p>																																																		

	<p>as determined by the individual Care Experienced young person.</p>																						
<p>Marriage or Civil Partnership</p>	<p>There is no impact on this characteristic. Recorded data in relation to formal marriage status/civil partnership does not make this an area for further exploration at this stage although with all young people there will be changes in partnership status that will need to be considered and incorporated into their pathway plan</p>		<p>Croydon CEYP. June 23.</p> <table border="1"> <thead> <tr> <th data-bbox="1124 432 1563 507">Marriage / Civil Partnership</th> <th data-bbox="1563 432 1778 507">Female</th> <th data-bbox="1778 432 1912 507">Male</th> <th data-bbox="1912 432 2143 507">Grand Total</th> </tr> </thead> <tbody> <tr> <td data-bbox="1124 507 1563 549">Married</td> <td data-bbox="1563 507 1778 549">1</td> <td data-bbox="1778 507 1912 549">2</td> <td data-bbox="1912 507 2143 549">3</td> </tr> <tr> <td data-bbox="1124 549 1563 590">Single</td> <td data-bbox="1563 549 1778 590">171</td> <td data-bbox="1778 549 1912 590">449</td> <td data-bbox="1912 549 2143 590">620</td> </tr> <tr> <td data-bbox="1124 590 1563 632">Not Recorded</td> <td data-bbox="1563 590 1778 632">29</td> <td data-bbox="1778 590 1912 632">68</td> <td data-bbox="1912 590 2143 632">97</td> </tr> <tr> <td data-bbox="1124 632 1563 673">Grand Total</td> <td data-bbox="1563 632 1778 673">201</td> <td data-bbox="1778 632 1912 673">519</td> <td data-bbox="1912 632 2143 673">720</td> </tr> </tbody> </table>	Marriage / Civil Partnership	Female	Male	Grand Total	Married	1	2	3	Single	171	449	620	Not Recorded	29	68	97	Grand Total	201	519	720
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Religion or belief

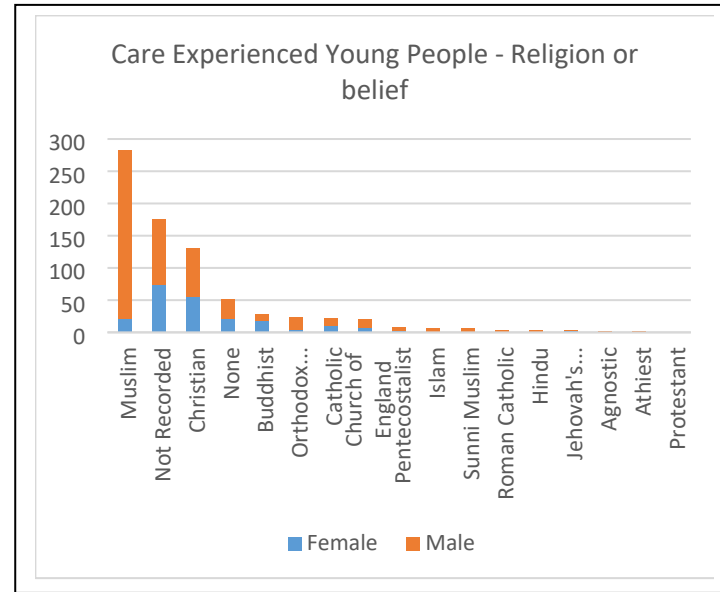
The pathway plan and personalized housing plan will ensure that a Care Experienced young person's religion or beliefs are assessed and considered as part of the plan of securing a home, identifying a suitable neighborhood and community.

The current CEYP data reflects the importance of assessing appropriate homes, community and location for many young people in their pathway plan.

Croydon Census Data 21.17-25 Population

The Census data is too broad on age range to provide a comparison to CEYP young people.

Croydon CEYP. June 23.



Race

The pathway plan and personalized housing plan will assess with the Care Experienced young person their race and culture in relation to planning for a new home and community. Croydon Council in 2023 is part of the pilot CELC Tackling Racial Injustice TRI programme adopting the London Councils anti racist statement and committing to a programme of seven workstreams of which community engagement is a key focus. This is a project under development and the findings will promote the development

Croydon Census Data 21.17-25 Population

Age	Asian	Black	Mixed	White	C
Aged 17	940	1,530	635	1,575	
Aged 18	765	1,235	490	1,425	
Aged 19	625	1,035	485	1,190	
Aged 20	540	940	385	1,360	
Aged 21	660	1,130	405	1,550	
Aged 22	720	1,235	450	1,820	
Aged 23	775	1,210	520	2,060	
Aged 24	885	1,335	520	2,110	
Aged 25	890	1,315	465	2,265	
Aged 17-25	6,800	10,965	4,355	15,355	1

of planning for Care Experienced young people.
<https://www.londoncouncils.gov.uk/our-key-themes/race-equality/london-local-government-tackling-racial-inequality-programme>

A1 - White British	A2 - White Irish	A3 - Any other White background	A4 - Traveller of Irish Heritage
81	2	146	1

B1 - White and Black Caribbean	B2 - White and Black African	B3 - White and Asian	B4 - Any other mixed background
29	8	4	18
C1 - Indian	C2 - Pakistani	C3 - Bangladeshi	C4 - Any other Asian background
3	5	1	211

D1 - Caribbean	D2 - African	D3 - Any other Black background	E1 - Chinese	E2 - Any other ethnic group
73	147	38	2	19

E3 - Refused	E4 - Information not yet obtained	
1	2	791

Croydon CEYP. June 23

Sexual Orientation	The joint protocol will ensure that a Care Experienced young persons needs will incorporate a careful assessment of their sexual orientation needs with regard to establishing a new home in the right environment with a support plan. Access to advise and community links through the LGBT+ statutory and voluntary partners will be incorporated as determined by the individual Care Experienced young person.		<p><u>Croydon Census Data 21.17-25 Population</u></p> <p>The Census data is too broad to provide a comparison to CEYP young people.</p> <div data-bbox="1137 359 1785 411" style="border: 1px solid black; padding: 2px;">Croydon CEYP.June 23.</div> <p>This data is not currently collated for reporting purposes for CEYP.</p>
Pregnancy or Maternity	The joint protocol will use the pathway plan and personalized housing plan to consider specific needs of a Care Experienced young persons circumstances related to pregnancy and establishing a home with their child/ren and partner if relevant. There are a range of options to provide a stepped approach to this support and moving to the desired home and location wherever possible.		<p><u>Croydon Census Data 21.17-25 Population</u></p> <p>The Census data is too broad to provide a comparison to CEYP young people.</p> <div data-bbox="1137 842 1785 895" style="border: 1px solid black; padding: 2px;">Croydon CEYP.June 23.</div> <p>This data is not currently collated for reporting purposes for CEYP.</p>

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
No further information is required at this stage		

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

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 3 – Impact scores

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

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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

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:

NA

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				
Race				
Sex (gender)				

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Gender reassignment				
Sexual orientation				
Age				
Religion or belief				
Pregnancy or maternity				
Marriage/civil partnership				

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	<p>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.</p> <p>The attached protocol is an improvement to current practice for Care Experienced young people up to age 25 years. It promotes more focus on the Corporate Parenting Approach of the Council in seeking to provide a more suitable and caring approach to young people particularly when the stability of their home is difficult to sustain, and they may experience homelessness. Through promoting a more joined up process through respective assessment and planning the young person's experience and outcomes will be more positive and evidence more careful consideration of their home, environment and support needs against the above equality characteristics. The protocol addresses a system for monitoring and review of this activity.</p>	X

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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.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Cabinet Date: 28 th June 23

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7. Sign-Off

Officers that must approve this decision	
Equalities Lead	Name: Denise McCausland Date: 12.6.23 Position: Equality Programme Manager
Director	Name: Roisin Madden Date: 9.6.23 Position: Director Childrens Social Care