# **Equality Analysis Form**

#### 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	Assistant Chief Executive
Title of proposed change	Equality Annual Report 2023 and Updated Croydon Equality Strategy 2023-27
Name of Officer carrying out Equality Analysis	Denise McCausland

#### 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.

- 1.1 This Equality Strategy refresh seeks to build on the foundations of the 2020-2024 Strategy, reflect the results of those changes and embed the initiatives the Council has introduced since 2021. For example, the adoption of the George Floyd Race Matters Pledge and the Croydon Equality Pledge has introduced new areas of focus for our equalities work; a new People and Cultural Transformation Strategy has been agreed, including a pillar of work focused on "building an equality driven, diverse and inclusive workplace;" and the Council has also participated as a pilot organisation on the Chief Executives London Committee (CELC) Tackling Racial Inequality Programme. Each of these initiatives and others have been incorporated in the refreshed Strategy, which has also been aligned with the Mayor's Business Plan, adopted by Council in 2022.
- 1.2 The four outcomes of the original strategy have been reduced to three and the objectives redistributed between the remaining outcomes. It is the actions, performance measures and narrative that have been updated. In addition, there are slight amendments to Outcome 3 (formerly Outcome 4) to better reflect the Council's responsibilities for health and social care, and two additional objectives under Outcome 1, to deepen accountability and effect systemic change within the authority, and to become an anti-racist organisation.
- 1.3 The original Strategy was based on 2011 Census data as this was the latest available at the time of adoption. The refresh uses data from the 2021 Census, giving a more accurate picture of the challenges in Croydon.
- 1.4 The Equality Annual Report enclosed in the cabinet report sets out a summary of progress made against each outcome in the current Strategy as well as key challenges facing the organisation.

The refreshed Equality Strategy will provide a framework for the Council to take positive action for all underrepresented characteristics both as an employer and a community leader, leading to equality of opportunity both in the organisation and the borough alike. The

Strategy sets out clear actions the Council take over the period to 2027. The Annual report details the actions undertaken to enhance equality in the borough in the year 2022-23.

#### 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 <a href="http://www.croydonobservatory.org/">http://www.croydonobservatory.org/</a> 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	The Equality Strategy will have a positive impact on age. The council has an older workforce and needs to attract younger employees. Work is currently being undertaken on the People Strategy which is intended to increase underrepresented young people who only make up 2% of the workforce at aged 24 and under.  A new young professional Staff Network Group to listen to the views and recommendations from younger staff was established during 2022.		According to the 2021 census, the split of ages across all wards in Croydon are somewhat comparable with each other. An outlier to note is Fairfield has a considerably lower average age that the reset of the borough's wards.

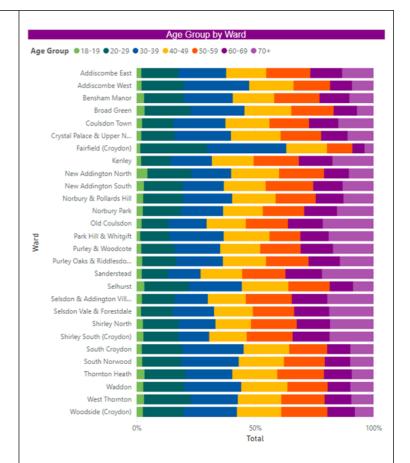
Diverse interview panels where possible will include younger panel members.

The Council will develop a youth safety plan with partners and young people to reduce serious youth violence and exploitation.

In partnership with the health service, work with education and training settings to listen to the voice of children and young people on their mental wellbeing, the availability of pastoral and therapeutic support in schools, and their links to support networks outside schools.

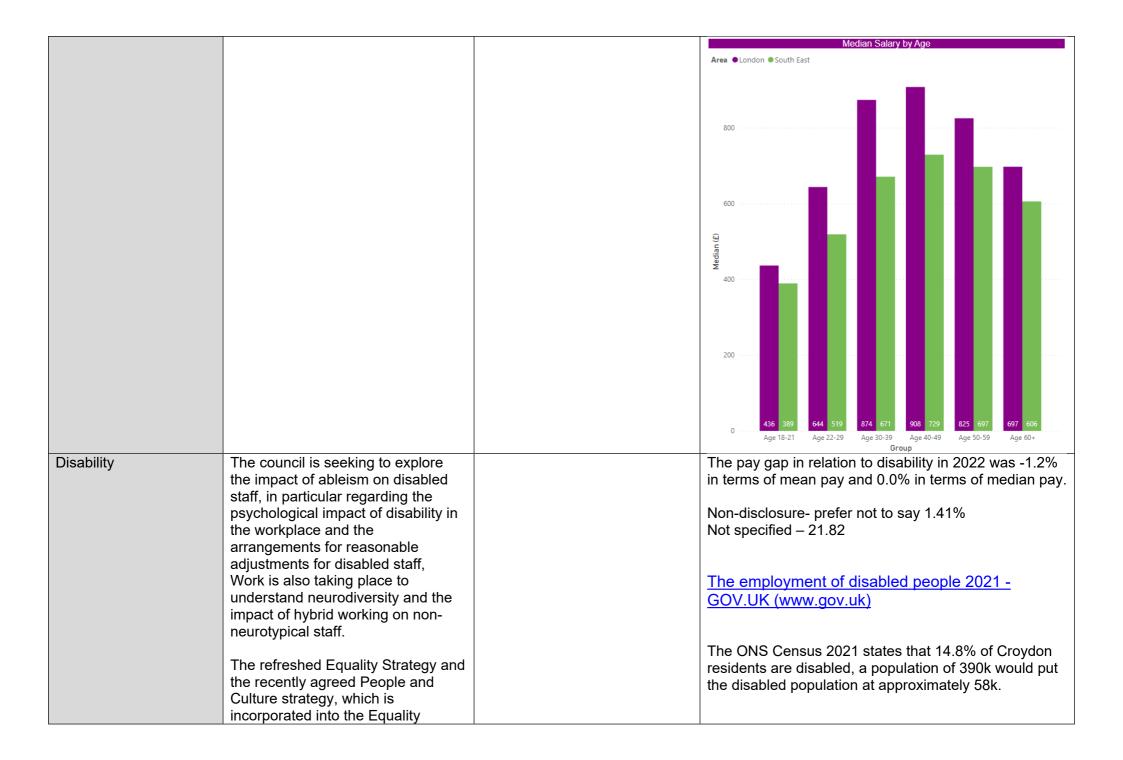
Working with the South London Partnership, we will use the Work and Health Programme to ensure that residents with disabilities, care leavers and those further away from the job market receive targeted personalized support into employment.

The requirements that recruitment panels are diverse is applicable to this and other characteristics, the impact of which will be monitored by the EDI Board.



The average age by ward is shown below, again noting Fairfield has the lowest average age.

Average Age by Ward
Sanderstead 43
Selsdon & Addington Vill 42
Old Coulsdon 42
Selsdon Vale & Forestdale 42
Shirley South (Croydon) 41
Shirley North 41
Kenley 41
Park Hill & Whitgift 41
Purley & Woodcote 41
Norbury Park 40
Addiscombe East 40
Purley Oaks & Riddlesdo 40
Norbury & Pollards Hill 39
Coulsdon Town 38
Coulsdon Town 38  Crystal Palace & Upper N 38
New Addington South 37
Bensham Manor 37
South Norwood 37
Thomton Heath 37
South Croydon 37
Woodside (Croydon) 37
Addiscombe West 36
Waddon 36
West Thornton 36
Selhurst 35
Broad Green 34
New Addington North 34
Fairfield (Croydon) 32
0 10 20 30 40 <b>Average Age</b>
Earnings by age
Whilst it is difficult to obtain data on Croydon specifical there are datasets available from the ONS which revie earnings by age at a higher level.
From the below it is shown that in London and in the South East in full-time employment lower income age are 18 to 29.



Strategy, will establish Positive Action training for underrepresented groups. The strategy aims to improve the lived experience of disabled staff in the workplace. This includes ensuring that reasonable adjustments are in place for staff and that there is a reduction in the number of disability employment tribunal cases.

Working with the South London Partnership, we will use the Work and Health Programme to ensure that residents with disabilities, care leavers and those further away from the job market receive targeted personalized support into employment.

The requirements that recruitment panels are diverse is applicable to this and other characteristics, the impact of which will be monitored by the EDI Board.

Like other minorized groups, it is intended that Disabled groups are fully engaged in the Borough of Culture events.

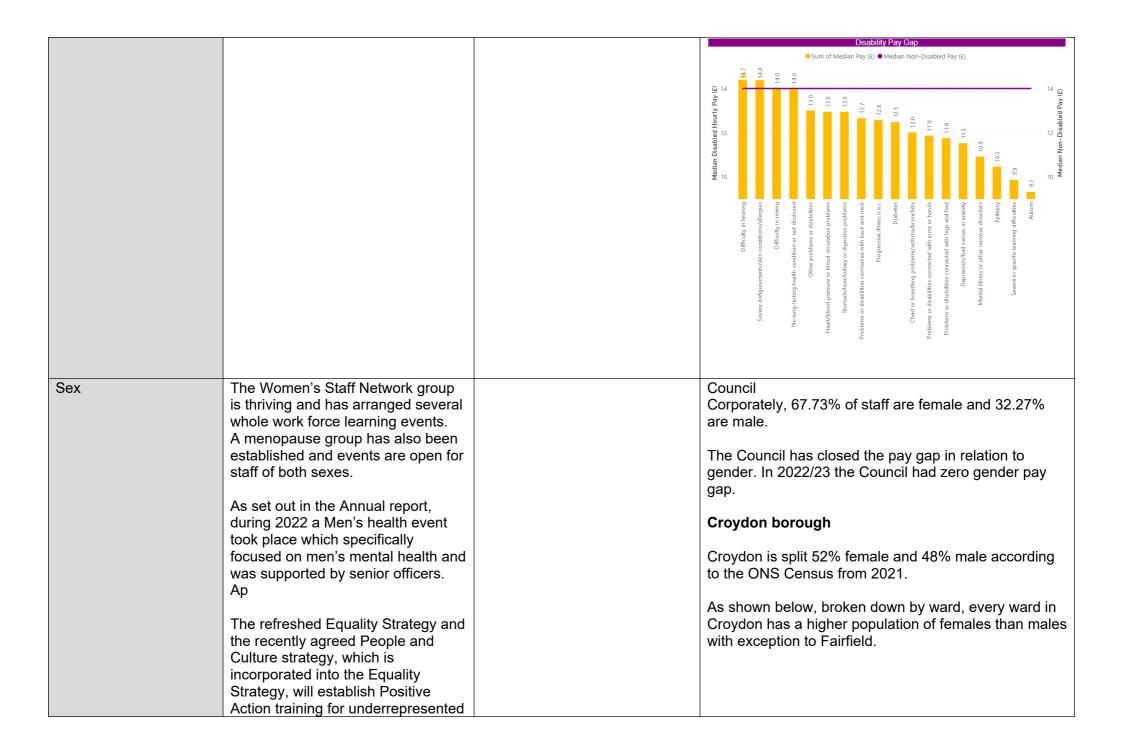
Although 12% of staff within tier 1-3 have disclosed a disability, this figure is still lower than the resident population.

As of 2021 disability pay gaps for mean and median calculations are very low with no pay gap reported for the median calculation.



From the chart above it can be seen that having a disability is more likely to mean a lower hourly wage.

However, that is not the case for all disabilities, in fact some disabled categories in 2021 were earning a higher median hourly wage than non-disabled workers



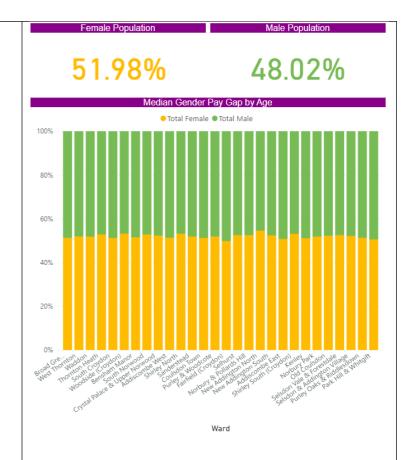
groups.

It also important to look at be mind full of issues around intersectionality where there are employees affected by changes in relation to both sex and age and sex and race.

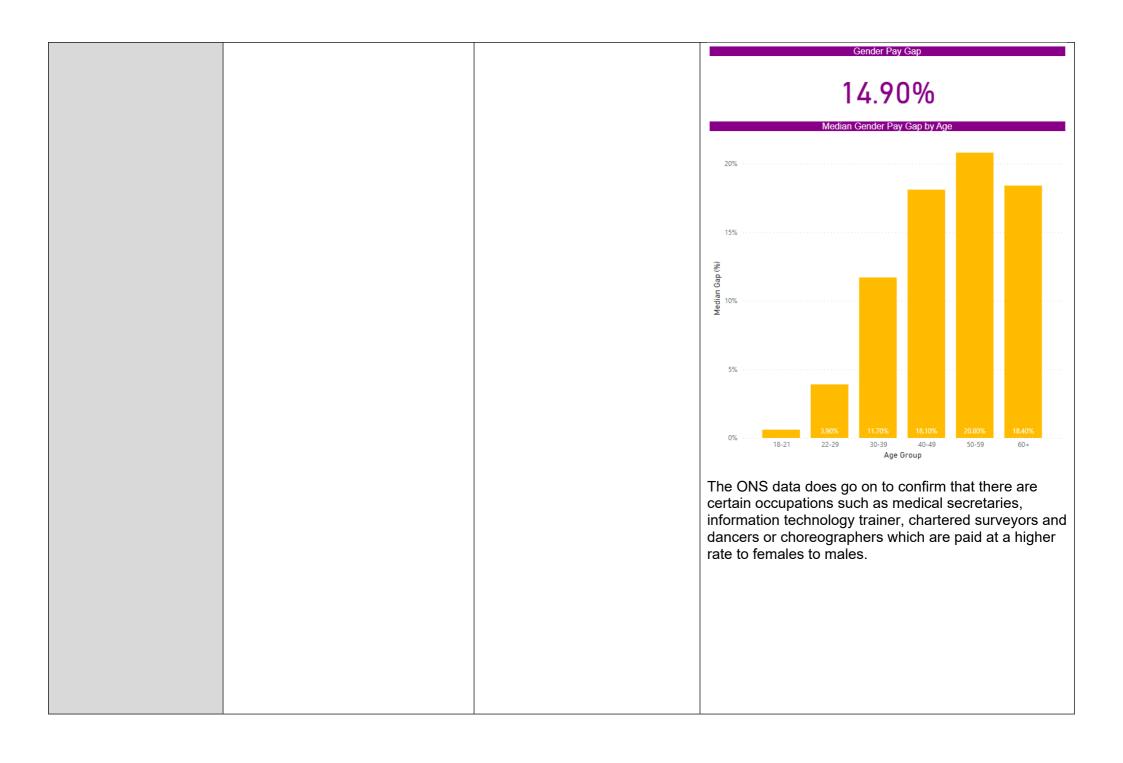
The requirements that recruitment panels are diverse is applicable to this and other characteristics, the impact of which will be monitored by the EDI Board.

The Council plans to develop a three-year partnership plan to tackle violence against women and girls.

The 2021 and 2022 gender pay gap figures were calculated as 0% for the as both mean and median figures.



This first metric and chart shows that males are earning 14.9% more income for the same employment as women. When looked at by age it is clear to see that females under 30 are paid closer to 4% less than males and females over 40 are paid close to 20% less than males. Based on this is it could be said that employed males over 40 are likely to be earning more than females.



#### Gender Reassignment

Disclosure rates for this minoritized group have increased.

The LGBT+ group are represented at the EDI Internal Control Board.

An LGBT+ Needs Assessment group has been formed by Public Health and works with statutory and voluntary partners in the borough to improve the lived experience of LGBT+ community in the organisation and the borough.

Having diverse recruitment panels will also have an impact on this protected characteristic and is included in the refreshed Equality Strategy.

LGBT+ community have been engaged in the Borough of Culture.

#### Workforce data:

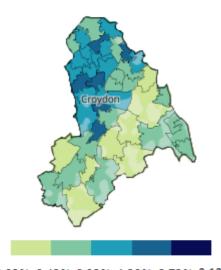
Non-disclosure- prefer not to say 0.97 % Not specified -39.8%

From that data 0.89% of Croydon residents identify as a gender different from sex registered at birth.

With higher populations in Central Croydon and North Croydon, area to note are Broad Green & Waddon (1.86%), Purely North (1.56%), Selhurst South & West Croydon (1.49%) and Thornton Heath North West (1.48%).

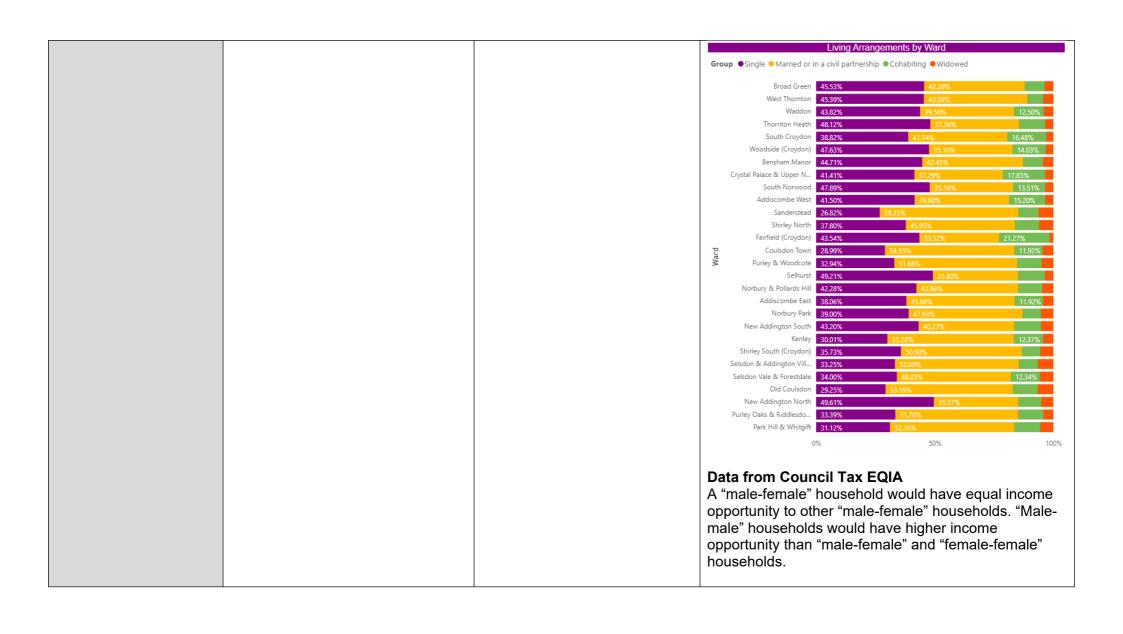
This can be seen from the map shown below.

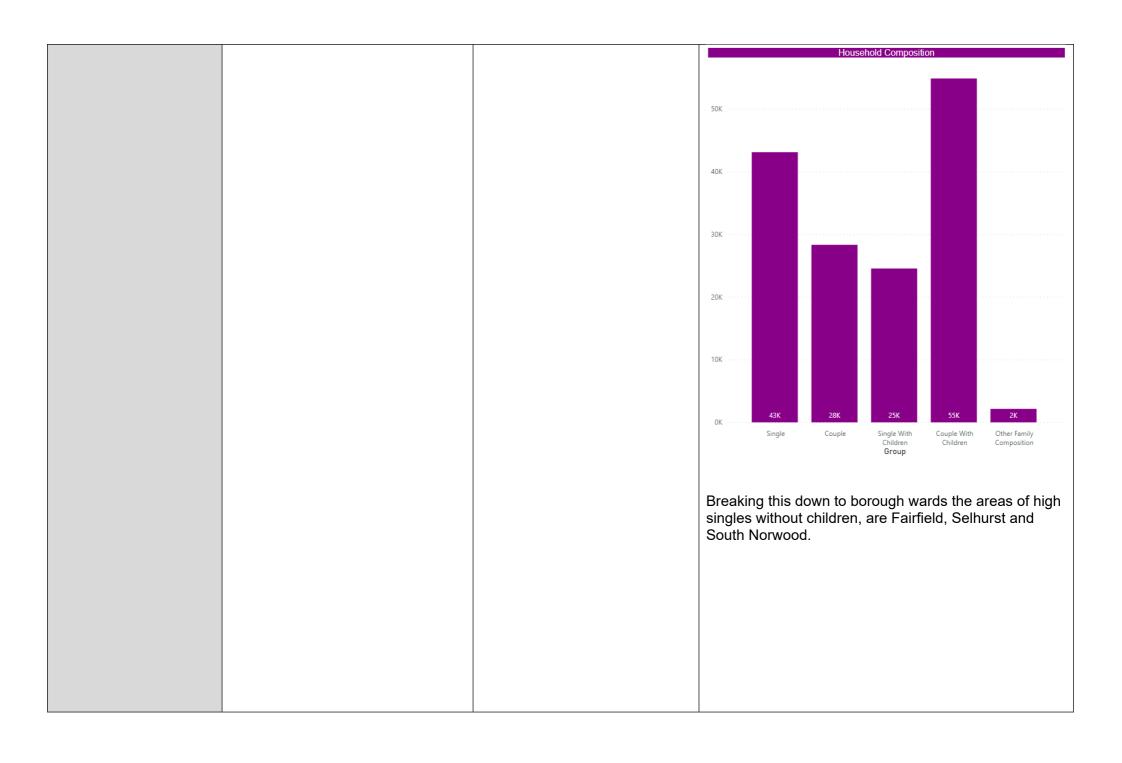
#### Gender Identity Different from Birth



0.02% 0.43% 0.82% 1.39% 2.73% 8.12%

Marriage or Civil	There is no impact on this				
Partnership	characteristic.		From the below it can be seen that the majority of		
			Croydon residents are married, in civil partnerships or co-habiting.		
			Living Arrangements		
			120Κ · · · · · · · · · · · · · · · · · · ·		
			100K		
			80K · · · · · · • • · · · · · · · · · · ·		
			60K · · · · ·		
			40K ·····		
			20K · · · · · ·		
			OK 123K 135K 36K 13K		
			Does Not Apply Single Married or in a Cohabiting Widowed civil partnership  Group		
			Broken into wards and excluding those that answered		
			the census "do not apply", it can be seen that there are high rates of single living arrangements in Fairfield,		
			Thornton Heath, Selhurst and New Addington		
		1			





#### Religion or belief

Over the past year the Christian staff network has become firmly established in the organisation and has joined the EDI Internal Control Board and has a voice at monthly meetings.

The group has arranged a number of events such as the Christmas carol service which have been well attended.

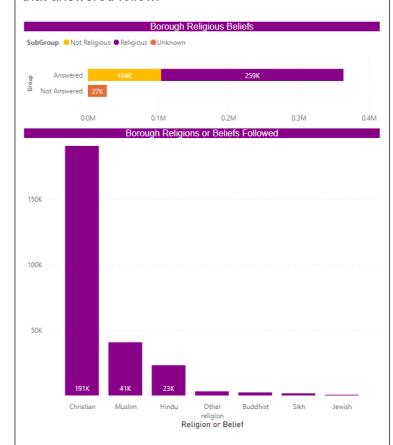
Members of other faith groups will be encouraged to establish their own Networks if they feel the need for them.

We will use the International Holocaust Remembrance Alliance (IHRA), definition of anti-Semitism and All-Party Parliamentary Group on British Muslims definition of Islamophobia as adopted by full Council. Some of these minoritized groups have also been racialized.

Faith groups have been engaged in the Borough of Culture events.

Non-disclosure- prefer not to say 7.83% Not specified – 39.8%

29% of Croydon residents have declared they are not religious. Compared with 71% (259k) of residents stating they do hold a religious belief. The chart below shows that breakdown and what religion or belief those that answered follow.



Breaking this down to specific religions followed in each ward, as the chart above would indicate there is a strong Christian presence in every ward with significant Muslim and Hindu populations in most.



Strategy will build on the Council's already clear commitment to antiracism.

The refreshed Equality Strategy and the recently agreed People and Culture strategy, which is incorporated into the Equality Strategy, will establish Positive Action training for underrepresented groups. The People Strategy will also support the aims of the council to work towards becoming an antiracist organisation by providing training and support to staff.

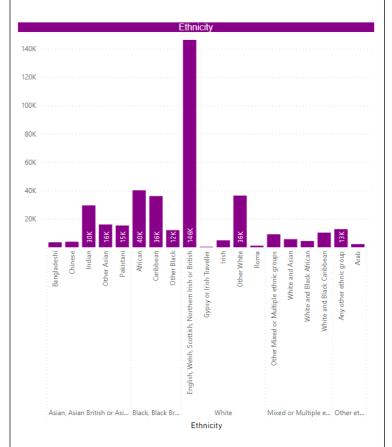
We no longer use the term BAME to describe ethnic groups.
We use the terms Global Majority, racialised groups and minorized groups.

THE Global Majority and other racialized groups have been fully included in the Borough of Culture celebrations.

As set out in the Annual Report, CMT have committed to improve the lived experience of the Global Majority and other racialized groups as part of The Big Promise as part of Race Equality Week 2023.

We have committed to a mentoring programme for Global Majority employees to reduce under-representation of staff at grade 15 and above.

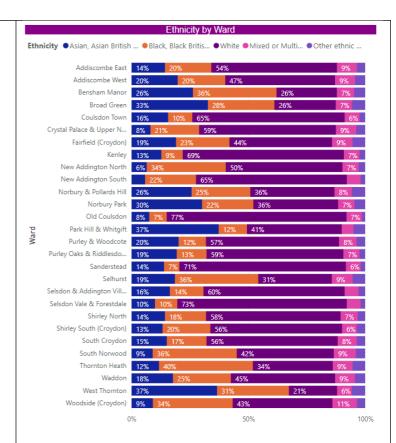
contains a few different groups as detailed in the chart below.



To determine if this is a representative picture of all areas of Croydon this data has also been reviewed at a ward level as well. This is shown in the chart below.

We will review our corporate approach to community engagement to ensure that it is effective in reaching all communities including minoritized groups, and promotes a culture of sustained and equitable engagement and participation within all areas of the organization.

The Global Majority have been included in the Borough of Culture events.



The below shows the ONS 2019 annual population survey which highlights that many ethnicities, when compared to the White British population are earning less at the same job. There are some ethnicities where earnings are higher than that of the White British counterpart.

Median hourly pay and pay gap, 17 ethnic groups, England and Wales, 2019 Pay gap (%) Hourly pay (£) White British £12.49 Pakistani White and Black African £10.57 Bangladeshi £10.58 White and Black Caribbean £10.92 £11.43 Other ethnic group £11.50 Black African Other White £11.55 background £11.90 African / Caribbean background £12.00 Black Caribbean £12.20 £12.50 multiple ethnic background £13.37 White and Asian £14.43 £15.38 Chinese £17.55 Source: Office for National Statistics - Annual Population Survey However, the pay quartiles show that (typically) White employees occupy a higher proportion of the upper pay quartiles compared to their representation in the workforce, and Global Majority and other racialised employees occupy a lower proportion of upper pay quartiles compared to their representation in the workforce. There is under-representation of Global Majority and other racialized staff at grade 15 and above.

Sexual Orientation	The LGBT+ group are represented at the EDI Internal Control Board. An LGBT+ Needs Assessment group has been formed by Public Health and works with statutory and voluntary partners in the borough to improve the lived experience of LGBT+ community in the organisation and the borough.  LGBT+ groups have been fully included in the Borough of Culture celebrations.  The People and Culture strategy will establish Positive Action training for minoritized groups.	Non-disclosure- prefer not to say 9.05% Not specified – 22.67%  There are individual companies and organisation that have made assessments of their businesses and published their findings.  For example, nationally PwC noted a 20.4% gap in their annual report.  Annual Report 2022 - Inclusion and diversity - PwC UK  There are other reports that have been published globally and in the UK that support this picture that gay, lesbian and bi-sexual workers are earning less than their straight counterparts.  The ONS Census from 2021 is the available data for Croydon on sexual orientation.  From this data a summary of Croydon is as follows:  Sexual Orientation (Not Straight/Hetrosexual)  Straight/Heterosexual  All other sexual - K  Did Not Answer  28K
Pregnancy or Maternity	The council continues to review its policies to ensure that thy are supportive and include adjustments for pregnancy and maternity.	The council does not have a way of identifying, or sizing, the number of residents that are pregnant or on maternity.

**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

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

#### 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** 

Sev	Lik	elihood	of Impa	act
Severity of Impact		1	2	3
y of	1	1	2	3
lmp	2	2	4	6
act	3	3	6	9

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





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
	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.  1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	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.  1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	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. <b>Equality impact score = likelihood of impact score x severity of impact score.</b>
Age	3	1	3
Disability	3	1	3
Gender	3	1	3
Gender reassignment	3	1	3
Marriage / Civil Partnership	3	1	3
Race	3	1	3
Religion or belief	3	1	3
Sexual Orientation	3	1	3
Pregnancy or Maternity	2	1	2

### **Equality Analysis**



4.	Statutory duties	
4.1	Public Sector Duties	
	he relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability Act 2010 set out below.	ity to meet any of the Public Sector Duties in the
Adva	ncing equality of opportunity between people who belong to protected groups	
Elimi	nating unlawful discrimination, harassment and victimisation	
Foste	ring good relations between people who belong to protected characteristic groups	
	rtant note: If the proposed change adversely impacts the Council's ability to meet any of the Public Stlined in the Action Plan in section 5 below.	Sector Duties set out above, mitigating actions must

#### 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:

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 complet						
Disability						
Race						
Sex (gender)						
Gender reassignment						
Sexual orientation						
Age						
Religion or belief						
Pregnancy or maternity						
Marriage/civil partnership						

## **Equality Analysis**



## 6. Decision on the proposed change

Based on the i	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				
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 Equality Strategy 2023-2027 has a positive impact on all protected characteristics and supports the Council in meeting the requirements of the Public sector Equality Duty, going beyond this duty towards best practice and cultural transformation.				
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					
	Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet  Meeting title: Date:				

# **Equality Analysis**



## 7. Sign-Off

Officers that must approve this decision			
Equalities Lead	Name: Denise McCausland  Position: Equality Programme Manager	Date: 16 August 2023	
Director	Name: David Courcoux  Position: Director - Policy, Programmes and Perform	Date: 17/08/23 nance	