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	Housing
Title of proposed change	Housing Strategy 2023-2028
Name of Officer carrying out Equality Analysis	Velvet Dibley

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 Housing Strategy intends to set the strategic priorities and objectives of the Housing Directorate for the next 5 years. A delivery plan will sit underneath.

The aim of our Housing Strategy 2023- 2028 is to deliver the following objectives detailed in the Mayor's Business Plan 2022- 2026:

- Get a grip on the finances and make the Council financially sustainable.
- Become a council which listens to, respects, and works in partnership with Croydon's diverse communities and businesses.
- Strengthen collaboration and joint working with partner organisations and the voluntary, community and faith sectors.
- Ensure good governance is embedded and adopt best practice.
- Develop our workforce to deliver in a manner that respects the diversity of our communities.
- Children and young people in Croydon have the chance to thrive, learn and fulfil their potential
- Croydon is a cleaner, safer and healthier place, a borough we're proud to call home
- Invest in council homes to drive up standards and develop a more responsive and effective housing service
- People can lead healthier and independent lives for longer

The Housing Strategy 2023- 2028 provides the strategic framework for the **Housing Transformation Programme**, a programme of individual projects which aim to improve and transform our housing services. The Housing Transformation Programme has identified specific areas of our housing services, such as void property management and our repairs service, which require immediate improvement, whilst the Housing Strategy sets out our longer-term ambitions.

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.

The creation of the Housing Strategy will be accompanied by the development of equalities impact assessments at a project level, where necessary, which will be developed in conversation with the Equalities Programme Manager. The project managers responsible for the delivery of projects within the delivery plan will ensure the EQIAs produced accurately assess the potential impact on vulnerable groups, and groups that share protected characteristics. All EQIAs produced will be treated as living documents and will be updated when data becomes available and new equality objectives identified where appropriate.

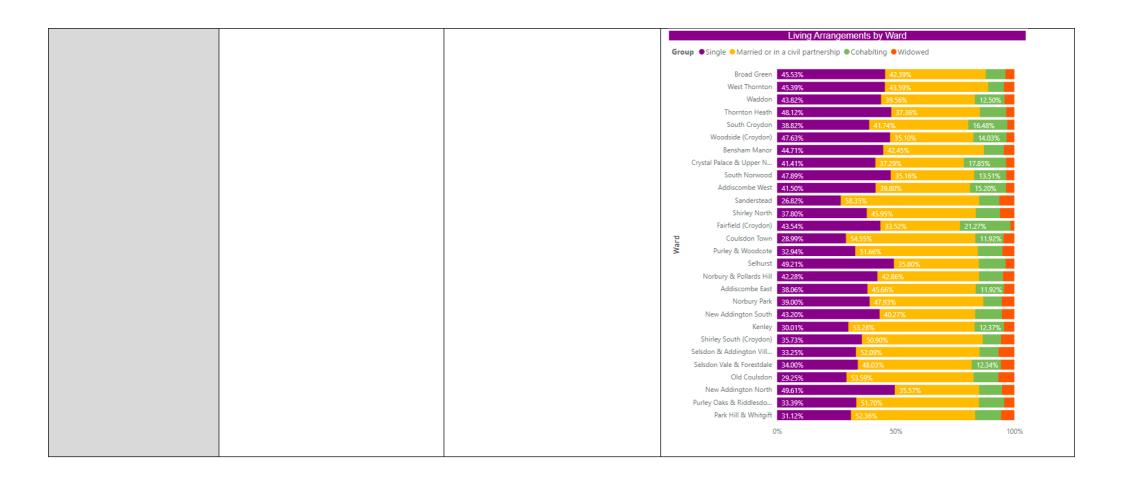
We also recognise that we don't currently collect useful or accurate data on our residents, work is underway to consider how we can better capture and collect data of our residents to ensure that changes to our services are data driven.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	The Housing Strategy will aim to focus on the needs of the population but will not directly impact on this characteristic. However, it will have due regard for the aims of the Equality Duty as part of the decision-making process. Any decision will consider the impact on people who share the protected characteristics before any decision is made. Individual delivery plans will have more in-depth consideration of the impact any	None	Census 2021 data shows the LB Croydon is the most populous borough in London with approximately 390,800 residents. The data tells us that there are approximately 80,321 residents aged 15 and under, 257,325 residents aged 16 to 64 years old, and 53,072 residents aged 65 years and older. The data shows that Croydon has the highest number of 0–19-year-olds in London.

	changes or actions will have on the protected characteristics as it will be clearly the likely impact.		population, woolds (Census Croydon's pro	ojected growth fron ne 7.9% (GLA 2020	n in 65+ year n 2022-2041 is
Disability	Residents with disabilities or parents of children with disabilities may be treated more favourably than others in relation to housing improvements. This will not amount to discrimination in relation to the Equality Act 2010. Individual delivery plans will have more in-depth consideration of the impact any changes or actions will have on the protected characteristics as it will be clearly the likely impact.		Disability No response Yes No Prefer not to say	Survey respondents 3.1% 12.2% 69.3% 15.3%	Census 2021 0.0% 14.4% 85.5% 0.0%
Sex	The Housing Strategy will aim to focus on the needs of the population but will not directly impact on this characteristic. However, it will have due regard for the aims of the Equality Duty as part of the decision making process. Any decision will	None	gender different to With higher popul Croydon, area to Purely North (1.5	.89% of Croydon reside from sex registered at b llations in Central Croyd note are Broad Green 66%), Selhurst South & rnton Heath North Wes	irth. lon and North & Waddon (1.86%), West Croydon

which de Inches	consider the impact on people ho share the protected naracteristics before any ecision is made. dividual delivery plans will ave more in-depth consideration of the impact any nanges or actions will have on the protected characteristics as will be clearly the likely neact.		Gender Identity Di		ow.
foo po im Ho for as pro co wh ch de	he Housing Strategy will aim to be cus on the needs of the opulation but will not directly apact on this characteristic. owever, it will have due regard or the aims of the Equality Duty is part of the decision making rocess. Any decision will onsider the impact on people ho share the protected naracteristics before any ecision is made. Individual delivery plans will have more in-depth onsideration of the impact any	None	Sex No response Female Male Prefer not to say	Survey respondents 2.9% 43.1% 40.2% 13.8%	0.0% 52.0% 48.0%

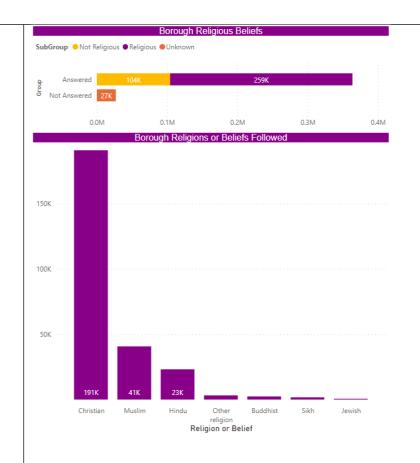
	changes or actions will have on the protected characteristics as it will be clearly the likely impact.		
Marriage or Civil Partnership	The Housing Strategy will aim to focus on the needs of the population but will not directly impact on this characteristic. However, it will have due regard for the aims of the Equality Duty as part of the decision making process. Any decision will consider the impact on people who share the protected characteristics before any decision is made. Individual delivery plans will have more in-depth consideration of the impact any changes or actions will have on the protected characteristics as it will be clearly the likely impact.	None	From the below it can be seen that the majority of Croydon residents are married, in civil partnerships or co-habiting. Living Arrangements 120K 100K 80K 20K Does Not Apply Single Married or in a civil partnership Widowed
			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



			Household Composition
			50K
			40K
			зок
			20K · · · · ·
			10К
			OK Single Couple Single With Couple With Other Family Children Children Composition Group
			Breaking this down to borough wards the areas of high singles without children, are Fairfield, Selhurst and South Norwood.
Religion or belief	The Housing Strategy will aim to focus on the needs of the population but will not directly impact on this characteristic. However, it will have due regard for the aims of the Equality Duty as part of the decision making process. Any decision will consider the impact on people who share the protected	None	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.

characteristics before any decision is made.

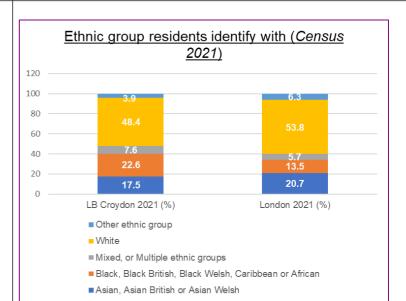
Individual delivery plans will have more in-depth consideration of the impact any changes or actions will have on the protected characteristics as it will be clearly the likely impact.



Race

The Housing Strategy will aim to focus on the needs of the population but will not directly impact on this characteristic. However, it will have due regard for the aims of the Equality Duty as part of the decision making process. Any decision will consider the impact on people who share the protected characteristics before any decision is made.

None



	Individual delivery plans will have more in-depth consideration of the impact any changes or actions will have on the protected characteristics as it will be clearly the likely impact.		
Sexual Orientation	The Housing Strategy will aim to focus on the needs of the population but will not directly impact on this characteristic. However, it will have due regard for the aims of the Equality Duty as part of the decision making process. Any decision will consider the impact on people who share the protected characteristics before any decision is made. Individual delivery plans will have more in-depth consideration of the impact any changes or actions will have on the protected characteristics as it will be clearly the likely impact.	None	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 SK Bisexual All other sexual OK 28K
Pregnancy or Maternity	The Housing Strategy will aim to focus on the needs of the population but will not directly impact on this characteristic. However, it will have due regard for the aims of the Equality Duty as part of the decision making process. Any decision will consider the impact on people who share the protected characteristics before any decision is made.	None	

	Individual delivery plans will have more in-depth consideration of the impact any changes or actions will have on the protected characteristics as it will be clearly the likely impact.	
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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

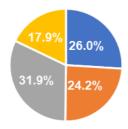
If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

attach evidence of previde with te appropriate data of reporte.				
Additional information needed and or Consultation Findings	Information source	Date for completion		
Consultation Findings	Housing Strategy Consultation	02.08.2023		
The survey was responded to by the following groups:				
• Tenant or leaseholder of Croydon Council: 29.2% (128)				
• Croydon Council Staff Member: 6.6% (29)				
• Voluntary, community or faith sector partner: 6.8% (30)				
• Statutory: 1.1% (5)				
• Other: 58.3% (256).				
Feedback on draft priorities				
•				
**Priority One: Listen to our residents and provide good housing services: 77.2%				
strongly agree or agree.				

 London, 152,900 (Census 2021). Census 2021 data shows us that most households in LB Croydon are one-person or two-person 		
Further researchCroydon has the highest number of households in	Mixed – Census 2021 / GLA Rents Map / ONS / PRS	
Tenancy services: 4 comments		
 Private rented sector: 55 comments Support for protected characteristic groups: 3 comments 		
• Planning: 20 comments		
• New affordable homes: 41 comments		
• Net-zero: 4 comments		
• Listening to residents: 20 comments		
• Improving council and private sector homes: 9 comments		
Housing register: 9 comments		
• Financial support for residents: 3 comments		
Council tax: 2 comments		
 Anti-social behaviour: Council culture: 29 comments 		
include?", see the number of comments made against each theme below:		
agree or agree "Is there anything else you think Croydon Council's Housing Strategy should		
of resources and manage the demand for housing related services: 69.9% strongly		
**Priority Five: Work with our partners and the local community to make best use		
needs of residents in Croydon: 65.3% strongly agree or agree		
**Priority Four: Maintain the supply of affordable homes that meets the diverse		
nomes and communities: 75.9% strongly agree or agree		
<i>c.</i>		
**Priority Two: Work with our partners, residents, and landlords to ensure that nomes in the borough are safe, secure, and energy efficient: 73.6% strongly agree or agree **Priority Three: Enable people to lead healthy and independent lives in their nomes and communities: 75.9% strongly agree or agree	r	

- Approximately 18.2% of households in the borough are 3-person households, and 24.1% of households are 4+ persons.
- In Croydon, average house prices were 11.88 times average earnings (Census 2021).
- Census 2021 data tell us that most households in Croydon own their own homes.
- Figure 3 provides a breakdown of households by tenure type.
- The data shows that 17.9% of households are in social rented homes.

Households by tenure type in LB Croydon (Census 2021)



- Private rented sector
- Owned outright
- Owned with a mortgage, loan or shared-ownership
- Social rented
- The majority of homes in Croydon are whole houses or bungalows (60.2%) whilst 39.7% of homes are flats, maisonettes, or apartments (Census 2021).
- A significant majority (63.3%) of homes have either two or three bedrooms (Census 2021).

• Census 2021 tells us that the majority of homes in LB Croydon are under-occupied (53.7%) compared to 10.4% of homes that are overcrowded.

Social homes

Croydon Council has a total of 13,440 social homes for social housing tenants. Croydon Council's social homes can be broken down into the following property types:

Homes: 4,820Bungalows: 231

• Flats: 7,007

Maisonettes: 1,382

Of the 13,440 social homes, 1,233 are supported housing units (RSH LARP look-up tool 2020). Croydon Council also has a total of 2545 leaseholders in addition to the 13,440 social homes.

Private rented sector homes

The monthly rent of a private rented sector (PRS) home is increasing across the country, nonetheless, cost increases are impacting Londoners more severely.

Data from the Office for National Statistics (ONS) states that tenants renting in London may have faced higher price rises between February 2022 and

February 2023 compared with other regions. The average increase between February 2022 and February 2023 was 12.0% in London compared to the England average of 9.7%.

The average PRS rent is lower in LB Croydon than the London average. Between January to December 2022, the average monthly rent prices are detailed in *Table 1* (GLA London Rents Map):

Property type	LB Croydon average	London average
Room	£537	£625
Studio	£878	£980
One-bedroom	£975	£1,250
Two-bedroom	£1,250	£1,500
Three-bedroom	£1,500	£1,800
4+ bedrooms	£2,000	£2,500

In contrast, the median annual pay for employees in Croydon (£34,226) was higher than the London average (£33,970) in 2022 (ONS 2022).

Home Ownership

As detailed in Figure 3, Census 2021 data tells us that the majority of residents in LB Croydon own their homes (56.1%).

ONS data tells us that in 2022, the median price house price in LB Croydon was £417,000 which was lower than the London average of £586,000.

The median house prices in LB Croydon by property type for 2022 are detailed in Table 2 below:

Property type	LB Croydon 2022
Median price paid for all property types	£417,000
Median price paid for detached houses	£775,000
Median price paid for semi- detached houses	£547,250
Median price paid for terraced houses	£435,000
Median price paid for flats and maisonettes	£285,000

Housing need

As of January 2023, there are approximately 6,979 households on Croydon Council's Housing Register

which represents an increase of 5.9% since January 2022.

The average wait time for a Croydon Council property between 2016 and 2021 was five years and 11 months. The majority of households on the housing register are waiting for one-bedroom and two-bedroom properties.

Rough sleeping

In 2020/2021, 271 people were seen rough sleeping in LB Croydon. Of the 271 people, 176 had not been seen rough sleeping prior to 2021/2022 (CHAIN Outer London Boroughs).

Table 3 details the number of rough sleepers seen in LB Croydon since April 2018:

Time period	Rough sleepers seen in LB Croydon
2018/19	274
2019/20	306
2020/21	322
2021/22	271
Change between 2020/21 and 2021/22	-51
Change between 2018/19 and 2021/22	-3

3.3	Impact scores
Exam If we a	<u>ple</u> 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

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

For guidance and support with consultation and engagement visit https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-

engagement/starting-engagement-or-consultation

is also 2 (likely to impact)

Table 4 - Equality Impact Score

SO

- Likelihood (2) x Severity (2) = 4

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

Table 3 - Impact scores

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 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	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	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	3	2	6
Disability	3	2	6
Gender	3	2	6
Gender reassignment	3	2	6
Marriage / Civil Partnership	3	2	6
Race	3	2	6
Religion or belief	3	2	6
Sexual Orientation	3	2	6
Pregnancy or Maternity	3	2	6

4.	Statutory duties	
4.1	Public Sector Duties	
1	the relevant box(es) to indicate whether the proposed change will adversely impact the Council's abili- lity Act 2010 set out below.	ty 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	
Fost	ering good relations between people who belong to protected characteristic groups	
	ortant note: If the proposed change adversely impacts the Council's ability to meet any of the Public Southined in the Action Plan in section 5 below.	ector 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 completion
Disability		Individual delivery plan should		
		have a more detailed impact		
		analysis due to likelihood of having		
		direct impact		
Race		Individual delivery plan should		
		have a more detailed impact		

analysis due to likelihood of having direct impact Sex (gender) Individual delivery plan should	
Sex (gender) Individual delivery plan should	
have a more detailed impact	
analysis due to likelihood of having	
direct impact	
Gender reassignment Individual delivery plan should	
have a more detailed impact	
analysis due to likelihood of having	
direct impact	
Sexual orientation Individual delivery plan should	
have a more detailed impact	
analysis due to likelihood of having	
direct impact	
Age Individual delivery plan should	
have a more detailed impact	
analysis due to likelihood of having	
direct impact	
Religion or belief Individual delivery plan should	
have a more detailed impact	
analysis due to likelihood of having	
direct impact	
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	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.		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	end the Our proposed change must be stopped or amended.		
	on be considered at a scheduled meeting? e.g. Contracts and	Meeting title: Cabinet	
Commissioning	Commissioning Board (CCB) / Cabinet Date: 27.09.2023		

7. Sign-Off

Officers that must	
Omooro mat mast	
annrova this desision	
approve this decision	

Equalities Lead	Name: Denise McCausland	Date:
	Position:	
Director	Name: Lara Ashley	Date:
	Position:	