

# 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

<b>Directorate</b>	<b>SUSTAINABLE COMMUNITIES, REGENERATION &amp; ECONOMIC RECOVERY</b>
<b>Title of proposed change</b>	<b>Local Flood Risk Management Strategy 2023</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Darragh Creegan, Flood Risk Officer</b>

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

The Flood and Water Management Act 2010 (FWMA) set new statutory responsibilities for managing flood risk and gives local authorities the lead role for managing local flood risk through the creation of Lead Local Flood Authorities (LLFAs) while the Environment Agency (EA) was given a strategic overview role. Local flood risk relates to the risk of flooding from surface water, ordinary watercourses and groundwater. The FWMA under Section 9 places a responsibility on the Council, as a LLFA to develop, maintain, apply and monitor a strategy for local flood risk management and requires it to be consistent with the National Strategy which was published by the EA in July 2020.

The LFRMS will form the basis on which the Council, as LLFA will manage local flood risk in the borough for the next 5 years. The Strategy aligns with the EA's National Strategy while being relevant at local level. Objectives and measures have been drafted in collaboration between Highways, Development Management, Spatial Planning, Corporate Resilience, Parks and Green Spaces, ICT Systems and GIS, Building Control and Environmental, collectively known as the LBC Flood Management Group. These objectives and measures relate to funding for local flood risk management, new development and nature based solutions, asset management, resident and business owner understanding of and preparedness for flood risk, sustainable growth, understanding of current and future flood risk and collaboration with other risk management authorities. An action plan has been drafted alongside the Strategy which will help the Council meet these objectives and measures.

## 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
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Age	The elderly can be particularly vulnerable to flood risk as they may be less able to take action and/or evacuate their property. They may also be less resilient in recovering from a flood both in terms of health and restoring their property from the impacts of a flood. A reduced risk of flooding will have a positive impact on elderly residents.	No negative impact.	Creating the LFRMS is a requirement of the Council as LLFA under the FWMA 2010. Figures from <a href="http://www.croydonobservatory.org">www.croydonobservatory.org</a> show that the percentage of the population in Croydon over 65 years of age is 13.6%. This is above the London percentage of 11.9% but below the national percentage of 18.4%. The source of these figures is the 2021 census.
Disability	Those with a disability can be particularly vulnerable to flood risk as they may be less able to prepare for a flood and evacuate during a flood if needed. They may be less resilient in recovering from a flood particularly in restoring their property to how it was prior to being flooded. The impact of flooding may also negatively impact the health of people in this group. A reduced risk of flooding will have a positive impact on residents with a disability.	No negative impact.	Data from <a href="http://www.croydonobservatory.org">www.croydonobservatory.org</a> , based on 2021 census data, shows that 14% of the population in Croydon is classed as disabled under the Equality Act. This is compared to a London average of 12.5%. This places Croydon at 24 out of 32 London boroughs plus the City of London in terms of the percentage of the population with a disability.  The same data shows that under the Equality Act, 6.1% of the population in Croydon are limited a lot in their day today activities. This compares to a London percentage of 5.7% and a national percentage of 7.3%.
Sex	No impact.	No negative impact.	N/A
Gender Reassignment	No impact.	No negative impact.	N/A
Marriage or Civil Partnership	No impact.	No negative impact.	N/A
Religion or belief	No impact.	No negative impact.	N/A

Race	No impact.	No negative impact.	N/A
Sexual Orientation	No impact.	No negative impact.	N/A
Pregnancy or Maternity	Those who are pregnant may be less able to evacuate during a flood event if needed. Through informing residents on how to better prepare for a flood event, and reducing the risk of flooding, the strategy will have a positive impact on this group.	No negative impact.	There is limited data available on pregnancy in the borough although data taken from <a href="http://www.croydonobservatory.org">www.croydonobservatory.org</a> , which is based on the GLA DataStore 2020 and ONS births 2020, shows that there were 5,304 births in the borough in 2019. The general trend is showing that there is a decline in the number of births per year in the borough in the period 2010 to 2019.

**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 <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**

<b>Severity of Impact</b>	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	<b>Likelihood of Impact</b>			

#### Key

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

## Equality Analysis

Table 3 – Impact scores

Column 1 <b>PROTECTED GROUP</b>	Column 2 <b>LIKELIHOOD OF IMPACT SCORE</b>  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.  <b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b>	Column 3 <b>SEVERITY OF IMPACT SCORE</b>  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.  <b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b>	Column 4 <b>EQUALITY IMPACT SCORE</b>  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	2	2	4
Disability	2	2	2
Sex	1	1	1
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	1	1	1
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	2	2	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

**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				
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				



## Equality Analysis

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 <b>X</b> in column 3 ( <b>Conclusion</b> ) 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. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</b>	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. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b>	
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. <b>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.</b>	
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	Meeting title: Cabinet Date: 31 January 2024
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### 7. Sign-Off

<b>Officers that must approve this decision</b>	
<b>Equalities Lead</b>	<b>Name:</b> Naseer Ahmad <b>Date:</b> 09/11/2023 <b>Position:</b> Interim Senior Equalities Officer
<b>Director</b>	<b>Name:</b> Karen Agbabiaka <b>Date:</b> 18/12/2023 <b>Position:</b> Director of Streets and Environment