

# 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>Assistant Chief Executive</b>
<b>Title of proposed change</b>	<b>Residents' survey</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Susie Rundle</b>

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

The council is reporting the findings of the recent residents' survey, which was conducted in autumn 2023, and proposing to run another survey in 2025. the protected characteristic groups. This was the first statistically significant residents' survey the council has conducted for some time, and doing this research has a positive impact for people with protected characteristics. It ensures that ensures the council is listening to its diverse communities and their feedback is informing service planning and the council's transformation plans.

In conducting the survey DJS Research's approach was designed to maximise response rates and quality of data from groups with protected characteristics under the Equality Act, those with language requirements, and disadvantaged residents. Quotas were set in alignment with the borough profile.

They implemented a range of techniques to ensure the research was as inclusive and accessible as it can be, recognising that Croydon is a diverse borough in terms of ethnicity, sexual orientation, nationality, religion and language. These included:

All DJS face-to-face interviewers are Interviewer Quality Control Scheme trained and received comprehensive training on the project prior to it starting,

The survey questions were formally piloted before fieldwork commenced. A total of 30 interviews were conducted with residents, ensuring a good representation of age, gender, ethnicity, working status, disability and sexual orientation. The pilot tested the comprehension of the survey questions, the full survey process including the length of the survey, the impact of the introduction on response rates and non-response, and how well the script was working, including routing of questions.

Across their team of London-based face-to-face interviewers DJS has the capability of conducting interviews in more than 20 languages. During the design stages, they assessed the ethnic and language profiles of Croydon's communities and allocated interviewers based on their matched demographic profile.

Interviews are conducted at different times and days of the week to give everyone an equal chance of taking part in the survey irrespective of childcare responsibilities, employment, or religious commitments etc. Interviewers conducted at least a third of their interviews at weekends, a third in the week before 5pm and a third in the week after 5pm. This is monitored as a KPI for each interviewer.

DJS set a monitoring quota by disability to ensure a representative spread of responses from these residents. Interviewers provided large-font paper copies of the survey to be self-completed where required or paper copies to those who are hard of hearing. Libraries were also contacted and asked to provide a seat or quiet space for interviews as needed.

### 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.

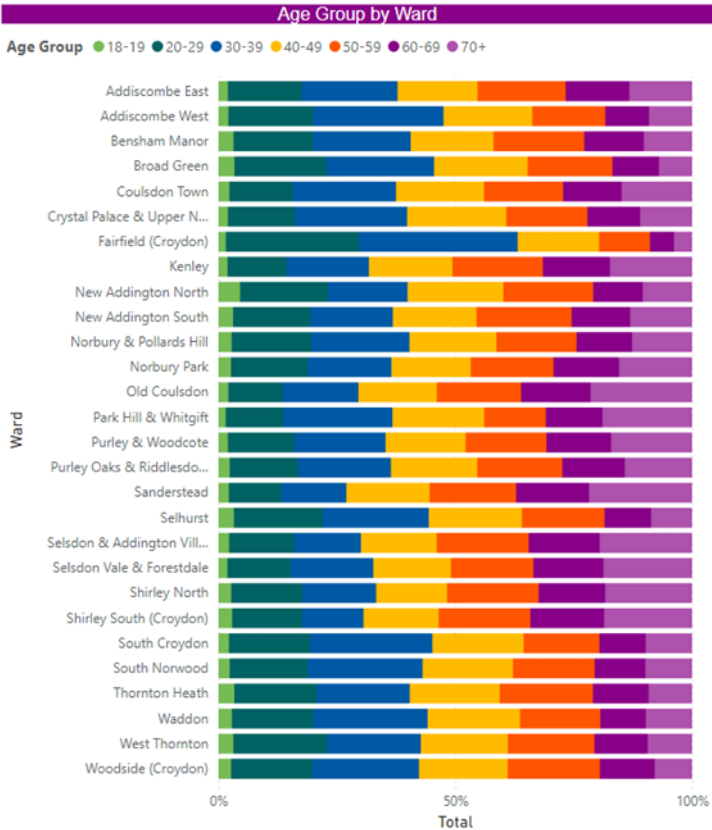
#### 3.1 Deciding whether the potential impact is positive or negative

**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	The survey sample was representative of the borough profile		Breakdown of ages surveyed for the residents' survey: 32% 16-34 19% 35-44 32% 45-64 17% 65+

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 than the rest of the borough's wards.



Disability

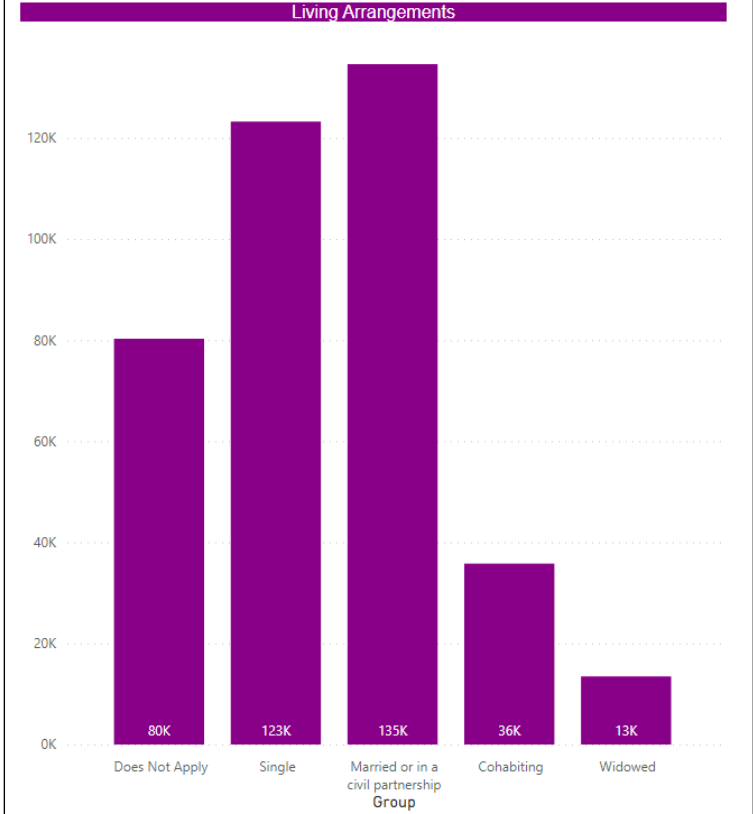
The survey sample was representative of the borough profile

The ONS Census 2021 states that 14.8% of Croydon residents are disabled, a population of 390k would put the disabled population at approximately 58k. 21% of residents surveyed had a disability

Gender Reassignment

This data was not recorded from interviewees at the time of the survey.

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

<p>Marriage or Civil Partnership</p>	<p>This data was not recorded from interviewees at the time of the survey</p>		<p>From the below it can be seen that the majority of Croydon residents are married, in civil partnerships or co-habiting.</p>  <table border="1"> <caption>Living Arrangements</caption> <thead> <tr> <th>Living Arrangement</th> <th>Number of Residents</th> </tr> </thead> <tbody> <tr> <td>Does Not Apply</td> <td>80K</td> </tr> <tr> <td>Single</td> <td>123K</td> </tr> <tr> <td>Married or in a civil partnership Group</td> <td>135K</td> </tr> <tr> <td>Cohabiting</td> <td>36K</td> </tr> <tr> <td>Widowed</td> <td>13K</td> </tr> </tbody> </table>	Living Arrangement	Number of Residents	Does Not Apply	80K	Single	123K	Married or in a civil partnership Group	135K	Cohabiting	36K	Widowed	13K
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<p>Pregnancy and Maternity</p>	<p>This data was not recorded from interviewees at the time of the survey</p>		<p>The council does not have a way of identifying, or sizing, the number of residents that are pregnant or on maternity. This information was not recorded in the residents' survey.</p>												
<p>Race</p>	<p>The survey sample was representative of the borough profile</p>		<p>The latest data from the ONS is set out in the chart below:</p>												

			<p style="text-align: center;"><b>Ethnicity</b></p> <table border="1"> <thead> <tr> <th>Ethnicity</th> <th>Count (K)</th> </tr> </thead> <tbody> <tr><td>Bangladeshi</td><td>~2</td></tr> <tr><td>Chinese</td><td>~2</td></tr> <tr><td>Indian</td><td>30</td></tr> <tr><td>Other Asian</td><td>16</td></tr> <tr><td>Pakistani</td><td>15</td></tr> <tr><td>African</td><td>40</td></tr> <tr><td>Caribbean</td><td>36</td></tr> <tr><td>Other Black</td><td>12</td></tr> <tr><td>English, Welsh, Scottish, Northern Irish or British</td><td>146</td></tr> <tr><td>Gypsy or Irish Traveller</td><td>~1</td></tr> <tr><td>Irish</td><td>~2</td></tr> <tr><td>Other White</td><td>36</td></tr> <tr><td>Roma</td><td>~1</td></tr> <tr><td>Other Mixed or Multiple ethnic groups</td><td>~5</td></tr> <tr><td>White and Asian</td><td>~2</td></tr> <tr><td>White and Black African</td><td>~2</td></tr> <tr><td>White and Black Caribbean</td><td>~5</td></tr> <tr><td>Any other ethnic group</td><td>13</td></tr> <tr><td>Arab</td><td>~1</td></tr> </tbody> </table> <p>Of those interviewed 56% of the sample identified as white, 20% Black, 14% Asian, 8% Mixed, 1% other and 1% prefer not to say</p>	Ethnicity	Count (K)	Bangladeshi	~2	Chinese	~2	Indian	30	Other Asian	16	Pakistani	15	African	40	Caribbean	36	Other Black	12	English, Welsh, Scottish, Northern Irish or British	146	Gypsy or Irish Traveller	~1	Irish	~2	Other White	36	Roma	~1	Other Mixed or Multiple ethnic groups	~5	White and Asian	~2	White and Black African	~2	White and Black Caribbean	~5	Any other ethnic group	13	Arab	~1
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Religion or belief	This data was not recorded from interviewees at the time of the survey		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.																																								

			<p><b>Borough Religious Beliefs</b></p> <p>SubGroup: Not Religious (Yellow), Religious (Purple), Unknown (Red)</p> <table border="1"> <thead> <tr> <th>Group</th> <th>Count</th> </tr> </thead> <tbody> <tr> <td>Answered</td> <td>104K (Not Religious) + 259K (Religious)</td> </tr> <tr> <td>Not Answered</td> <td>27K (Unknown)</td> </tr> </tbody> </table> <p><b>Borough Religions or Beliefs Followed</b></p> <table border="1"> <thead> <tr> <th>Religion or Belief</th> <th>Count</th> </tr> </thead> <tbody> <tr> <td>Christian</td> <td>191K</td> </tr> <tr> <td>Muslim</td> <td>41K</td> </tr> <tr> <td>Hindu</td> <td>23K</td> </tr> <tr> <td>Other religion</td> <td>~5K</td> </tr> <tr> <td>Buddhist</td> <td>~5K</td> </tr> <tr> <td>Sikh</td> <td>~5K</td> </tr> <tr> <td>Jewish</td> <td>~5K</td> </tr> </tbody> </table>	Group	Count	Answered	104K (Not Religious) + 259K (Religious)	Not Answered	27K (Unknown)	Religion or Belief	Count	Christian	191K	Muslim	41K	Hindu	23K	Other religion	~5K	Buddhist	~5K	Sikh	~5K	Jewish	~5K
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Sex	The survey sample was representative of the borough profile		<p>Croydon is split 52% female and 48% male according to the ONS Census from 2021.</p> <p>Of those interviewed in the residents' survey, 53% of the sample identified as women and 47% as men</p>																						
Sexual Orientation	The survey sample was representative of the borough profile		<p>The ONS Census from 2021 is the available data for Croydon on sexual orientation.</p> <p>Sexual Orientation (Not Straight/Hetrosexual) vs Straight/Heterosexual</p> <table border="1"> <thead> <tr> <th>Sexual Orientation</th> <th>Count</th> </tr> </thead> <tbody> <tr> <td>Gay or Lesbian</td> <td>5K</td> </tr> <tr> <td>Bisexual</td> <td>4K</td> </tr> <tr> <td>All other sexual ...</td> <td>1K</td> </tr> <tr> <td>Did Not Answer</td> <td>273K</td> </tr> <tr> <td>Other</td> <td>28K</td> </tr> </tbody> </table> <p>From this data a summary of Croydon is as follows:</p>	Sexual Orientation	Count	Gay or Lesbian	5K	Bisexual	4K	All other sexual ...	1K	Did Not Answer	273K	Other	28K										
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			Of those interviewed in the residents' survey, 85% identified as heterosexual, 2% as gay or lesbian, 1% as bisexual and 12% as prefer not to say

### 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	3	1	3
Disability	3	1	3
Gender Reassignment	3	1	3
Marriage or Civil Partnership	3	1	3
Pregnancy and Maternity	3	1	3
Race	3	1	3
Religion or belief	3	1	3
Sex	3	1	3
Sexual Orientation	3	1	3

# 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
Age				
Disability				
Gender Reassignment				
Marriage or Civil Partnership				
Pregnancy and Maternity				

## Equality Analysis

Race				
Religion or belief				
Sex				
Sexual Orientation				

### 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	<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. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</b></p> <p>The survey results are likely to have some impact on people because they will inform future service planning and transformation planning – however this impact is unknown at the moment and will have to be determined as and when changes arise. The survey itself does not have an impact.</p>	x
Adjust the proposed change	<p>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></p>	
Continue the proposed change	<p>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></p>	

## Equality Analysis

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: 31 January 2024	

### 7. Sign-Off

<b>Officers that must approve this decision</b>		
<b>Equalities Lead</b>	<b>Name: Naseer Ahmad</b>	<b>Date: 23/01/2024</b>
	<b>Position: Interim Senior Equalities Officer</b>	
<b>Director</b>	<b>Name: David Courcoux</b>	<b>Date: 23/01/2024</b>
	<b>Position: Director of Policy, Programmes and Performance</b>	