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	Resources
Title of proposed change	Section 13A – Care Leavers Scheme
Name of Officer carrying out Equality Analysis	

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.

This change is an amendment to an existing scheme. The council reduces council tax for care leavers and their households, the proposal suggests two changes. The first is to remove the discount where the care leaver is placed by another local authority, not Croydon. For example, if Surrey County Council places a care leaver in Croydon, then Croydon reduces the council tax. However, if Croydon places a care leaver in Surrey County, then Croydon must pay Surrey the council tax due, Surrey does not forego that revenue. This first change seeks to balance that scale.

The second change aims to only award the reduction in council tax where the care leaver is the liable party. Many other local authorities operate their schemes in this way, and by changing the scheme the council could be foregoing less revenue.

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	Care leavers between the age of 18 and 24 liable to pay Council Tax in Croydon, and for whom Croydon Council is the corporate parent, will continue to receive the Council Tax Care Leaver Relief scheme.	Care leavers between the age of 18 and 24, liable to pay Council Tax in Croydon, for whom Croydon Council is not the corporate parent, will no longer receive Council Tax Care Leaver Relief scheme. We believe that there is between 50/60 care leavers for whom Croydon are not the corporate parent.	Total Impacted distribution reaches th	n of a	ge le	/ers eave	are	2 172 betw	een	18 a	nd 2						

Disability	Care leavers	Care leavers between the age of 18 and 24, liable to		16	17	18	19	20	21	1	22	23	24	Total	
	between the age of 18 and 24 liable to	pay Council Tax in Croydon, for whom	Disabled		1	9	13	9	8		8	7	1	56	
	pay Council Tax in Croydon, and for whom Croydon	Croydon Council is not the corporate parent, will	Not Disabled	5	6	102	139	163	12	5 1	121	65	29	755	
	Council is the	no longer receive Council Tax Care Leaver Relief	Total	5	7	111	152	172	13	3 1	29	72	30	811	
	corporate parent, will continue to receive the Council Tax Care Leaver Relief scheme.	We have 56 care leavers who are disabled.	The majority of care leavers are not disabled and proposed chan make no reference to any disabled qualifying criteria.										chang	es to ti	ie scheme
Sex	Care leavers	Care leavers between the													
between the age of 18 and 24 liable to pay Council Tax in Croydon, and for	age of 18 and 24, liable to pay Council Tax in		16	17	18	19	20	21	22	23	24	Tot	al		
		Croydon, for whom Croydon Council is not the corporate parent, will no longer receive Council	Female	1	2	33	50	40	39	31	21	12	2 22	9	
	Croydon, and for		Male	4	5	78	102	132	94	98	51	18	58	2	
	whom Croydon		Total	5	7				133	129	72			_	
	Council is the corporate parent, will continue to receive the Council Tax Care Leaver Relief scheme. Ho foliger Tax Care scheme. As we ha than fema more mal care leave impacted.			les ho	wever										It, is applied to ing on the sex
Gender Reassignment	None identified that positively impact this group.	None identified that negatively impact this group.	No Data	Availa	able										
Marriage or Civil Partnership	None identified that positively impact this group.	None identified that negatively impact this group.	No Data Available No Data Available												
Religion or belief	None identified that positively impact this group.	None identified that negatively impact this group.													

Race	Care leavers	Care leavers between the		16	17	18	19	20	21	22	23	24	Total
		age of 18 and 24, liable to	A1 - White British	3		14	18	14	22	9	7		87
	between the age of	pay Council Tax in	A2 - White Irish					1				1	2
	18 and 24 liable to	Croydon, for whom	A3 - Any other White background	1	2	11	26	41	16	26	13	11	147
	pay Council Tax in	Croydon Council is not	A4 - Traveller of Irish Heritage				1						1
	Croydon, and for	the corporate parent, will	B1 - White and Black Caribbean			3	7	10	2	5	2		29
	whom Croydon	no longer receive Council	B2 - White and Black African			2	1	2	1		1		7
	Council is the	Tax Care Leaver Relief	B3 - White and Asian				1	2		1			4
	corporate parent,	scheme.	B4 - Any other mixed background		1	4	4	3	1	5	3		21
	will continue to		C1 - Indian			1	1	2					4
	receive the Council	There is no one ethnicity	C2 - Pakistani		1		1	1		1			4
	Tax Care Leaver	that will be	C3 - Bangladeshi			1							1
	Relief scheme.	disproportionally affected.	C4 - Any other Asian background			37	39	41	40	34	19	7	217
			D1 - Caribbean		2	10	20	19	7	10	4	5	77
			D2 - African			20	18	28	32	32	14	5	149
			D3 - Any other Black background	1	1	5	11	4	7	3	6	1	39
			E1 - Chinese				2						2
			E2 - Any other ethnic group			3	2	4	4	3	3		19
			E3 - Refused Total	5	7		152		1			30	1 811
		32% of care leavers are of blac 29% of care leavers are of asia 28% of care leavers are of whit There is no race that will be im	in eth e eth	nicit	y y	o tha	ın an	y oth	ner ra	ace.			
Sexual Orientation	None identified that positively impact this group.	None identified that negatively impact this group.	No Data Available										
Pregnancy or Maternity	None identified that positively impact this group.	None identified that negatively impact this group.	No Data Available										

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 nee		Information source	Date for completion			
We carried out a public consultation regarding these proposed 2024. We received 25 responses, of which 8 or 32% were find the proposed changes the responses were:					Results from consultation	
	Strongly Agree or Agree	Strongly Disagree	Neither Agree nor disagree			
How much do you agree or disagree that Croydon Council should continue to offer a council tax reduction to care leavers between the ages of 18 and 24 (inclusive) where they are the named person for council tax for a property?	87.50%	12.50%				
How much do you agree or disagree that Croydon Council should continue to pay council tax for Croydon care leavers aged 18 to 24 (inclusive) who live out of the borough?	92%	4%	4%			
How much do you agree or disagree with our proposal to stop the 100% council tax reduction for care leavers placed in Croydon by other local authorities?If these care leavers do not receive support from the borough/corporate parent they have come from, and need help paying their council tax they will be encouraged to apply for Council Tax Support	50%	50%				
How much do you agree or disagree with our proposal to stop the 100% council tax reduction for households where a care leaver lives but is not the named person to pay council tax e.g the landlord pays the council tax?These households will be able to apply for Council Tax Support if they need help paying their council tax.	21.70%	73.90%	4.30%			
Out of the 25 respondents, 22 answered the question relativere male, 3 did not answer this question. 22 respondents declared to be over 16 years of age and 3 of the second secon	did not answer this que	estion.				
We asked a question for respondents over the age of 16 if the birth? 19 or 90.5% said yes, and 2 or 9.5% preferred not to			e same as reg	jistered at		

16 respondents described their sexual orientation as Heterosexual/Straight, 5 or 23.8% preferred not to say, and 4 did not answer this question.

We asked which age range respondents were in and the results are below:

Which age range are you in?	16 - 19	20 - 24	25 - 34	35 - 4 4	45 - 54	55 - 64	65 - 74	Prefer not to say	Did not answer the question
Percentage of Respondents	4.50%	27.30%	0%	4.50%	9.10%	22.70%	13.60%	18.20%	3
Number of Respondents	1	6	0	1	2	5	3	4	3

In relation to ethnic origin the responses are below:

How would you describe your ethnic origin?	White English	Pakistani	Bangladeshi	Black African	Black Caribbean	Any other Black background	Any other Asian Background	Chinese	Did not answer the question
Percentage of Respondents	36.40%	9.10%	4.50%	9.10%	13.60%	9.10%	13.60%	4.50%	
Number of Respondents	8	2	1	2	3	2	3	1	3

When asking what is your legal marital or registered civil partnership status the responses are below:

	Never married and never registered a civil	~				Did not answer the
Currently, what is your legal marital or registered civil partnership status?	partnership	Married	Divorced	Widowed	Prefer not to say	question
Percentage of Respondents	47.80%	21.70%	8.70%	4.30%	17.40%	
Number of Respondents	11	5	2	1	4	2

We asked the respondents if they or their partner had a baby in the last 12 months, to which 2 or 9.1% said yes, 16 or 72.7% said no, 4 or 18.2% preferred not to say and 3 did not answer this question.

We asked respondents if they consider themselves to have a disability(ies) to which 3 or 13.6% said yes, 13 or 59.1% said no, 6 or 27.3% preferred not to say and 3 did not answer this question. Of the 3 who declared a disability(ies):

- 1 declared visually impaired disability
- 1 declared mobility disability
- 1 declared learning disability
- 1 declared Autism
- 2 declared ADHA

- 1 declared Ashma
- 1 declared other disability

We asked about religion and the responses are below:

Christian	Muslim	No Religion	Baha'i	Prefer not to say	Did not anser the question
36.40%	18.20%	13.60%	4.50%	27.30%	- 10 ¹¹
8	4	3	1	6	3

We asked respondents which Croydon ward they live in, and the responses are below:

Which Croydon ward do you live in?	Number of Respondents	% of respondents
Broad Green	1	4.30%
Coulston Town	2	8.70%
Kenley	1	4.30%
Norbury & Pollards Hill	1	4.30%
Purley & Woodcote	1	4.30%
Purley Oaks & Riddlesdown	2	8.70%
Selsdon & Addington	1	4.30%
South Croydon	1	4.30%
South Norwood	3	13%
Thornton Heath	4	17.40%
Waddone	1	4.30%
Other	1	4.30%
Prefer not to say	4	17.40%
Did not answer the question	2	

Although 73.9% of respondents strongly disagreed *"to stop the 100% care leavers reduction scheme to households where a care leaver resides but it is not the care leaver who is responsible for paying the council tax"*. It should be noted that the Council is reviewing foster carer allowance arrangements and will ensure that payments for carers with "Staying Put" arrangements include support for Council Tax, so that foster carers already in the scheme are not disadvantaged and to support the Council's ambition to increase take up of these arrangements. In addition, if the resident responsible for paying council tax is on low or no income, they will be able to claim Council Tax Support.

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

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

بد					Key	
Impact	3	3	6	9	Risk Index	Risk Magnitude
ğ					6 – 9	High
<u></u>	2	2	4	6	3 – 5	Medium
of					1 – 3	Low
-	1	1	2	3		
/erity		1	2	3		
Sev	Lik	elihood	l of Imp	act		

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	2	1	2
Disability	2	1	2
Sex	2	1	2
Gender reassignment	2	1	2
Marriage / Civil Partnership	2	1	2
Race	2	1	2
Religion or belief	2	1	2
Sexual Orientation	2	1	2
Pregnancy or Maternity	2	1	2

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.

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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	Potentially becoming liable to pay	It is expected that support is provided	The process to	
	Council Tax in Croydon.	by the Local Authority who has	claim Council Tax	N/A
		corporate parenting responsibility for	Support currently	
		the care leaver. If this is not	exists as part of	
		forthcoming, and the care leaver is in	Council Tax	
		receipt of no or low income, the care	"business as usual"	
		leaver will be able to make a claim for	administration.	

Disability	Potentially becoming liable to pay Council Tax in Croydon.	Council Tax Support, to help pay for Council Tax. It is expected that support is provided by the Local Authority who has corporate parenting responsibility for the care leaver. If this is not forthcoming, and the care leaver is in receipt of no or low income, the care leaver will be able to make a claim for Council Tax Support, to help pay for Council Tax.	The process to claim Council Tax Support currently exists as part of Council Tax "business as usual" administration.	N/A
Sex	Potentially becoming liable to pay Council Tax in Croydon.	It is expected that support is provided by the Local Authority who has corporate parenting responsibility for the care leaver. If this is not forthcoming, and the care leaver is in receipt of no or low income, the care leaver will be able to make a claim for Council Tax Support, to help pay for Council Tax.	The process to claim Council Tax Support currently exists as part of Council Tax "business as usual" administration.	N/A
Gender reassignment	Potentially becoming liable to pay Council Tax in Croydon.	It is expected that support is provided by the Local Authority who has corporate parenting responsibility for the care leaver. If this is not forthcoming, and the care leaver is in receipt of no or low income, the care leaver will be able to make a claim for Council Tax Support, to help pay for Council Tax.	The process to claim Council Tax Support currently exists as part of Council Tax "business as usual" administration.	N/A

Marriage / Civil Partnership	Potentially becoming liable to pay Council Tax in Croydon.	It is expected that support is provided by the Local Authority who has corporate parenting responsibility for the care leaver. If this is not forthcoming, and the care leaver is in receipt of no or low income, the care leaver will be able to make a claim for Council Tax Support, to help pay for Council Tax.	The process to claim Council Tax Support currently exists as part of Council Tax "business as usual" administration.	N/A
Race	Potentially becoming liable to pay Council Tax in Croydon.	It is expected that support is provided by the Local Authority who has corporate parenting responsibility for the care leaver. If this is not forthcoming, and the care leaver is in receipt of no or low income, the care leaver will be able to make a claim for Council Tax Support, to help pay for Council Tax.	The process to claim Council Tax Support currently exists as part of Council Tax "business as usual" administration.	N/A
Religion or belief	Potentially becoming liable to pay Council Tax in Croydon.	It is expected that support is provided by the Local Authority who has corporate parenting responsibility for the care leaver. If this is not forthcoming, and the care leaver is in receipt of no or low income, the care leaver will be able to make a claim for Council Tax Support, to help pay for Council Tax.	The process to claim Council Tax Support currently exists as part of Council Tax "business as usual" administration.	N/A
Sexual Orientation	Potentially becoming liable to pay Council Tax in Croydon.	It is expected that support is provided by the Local Authority who has	The process to claim Council Tax	N/A

		corporate parenting responsibility for the care leaver. If this is not forthcoming, and the care leaver is in receipt of no or low income, the care leaver will be able to make a claim for Council Tax Support, to help pay for Council Tax.	Support currently exists as part of Council Tax "business as usual" administration.	
Pregnancy or Maternity	Potentially becoming liable to pay Council Tax in Croydon. None	It is expected that support is provided by the Local Authority who has corporate parenting responsibility for the care leaver. If this is not forthcoming, and the care leaver is in receipt of no or low income, the care leaver will be able to make a claim for Council Tax Support, to help pay for Council Tax.	The process to claim Council Tax Support currently exists as part of Council Tax "business as usual" administration.	N/A

6. Decision on the proposed change

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. Reason: The scheme has no potential for discrimination in itself, the proposed change also has no potential for discrimination. The council is seeking to collect council tax from other local authorities and from residents where they, themselves, are not care leavers.	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	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	Meeting title:
Commissioning Board (CCB) / Cabinet	

7. Sign-Off

Officers that must approve this decision	
Equalities Lead	Name:Naseer AhmadDate: 08/01/2024Position: Interim Senior Equalities Officer
Director	Name: Date: Position: