

# Equality Analysis: Revenue Budget and Council Tax Levels 2024-25

## 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 help us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also help 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>All</b>
<b>Title of proposed change</b>	<b>Revenue Budget and Council Tax Levels 2024-25</b>
<b>Name of Officers carrying out Equality Analysis</b>	Allister Bannin, Director of Finance (Deputy s151 Officer)

### 2.1 Purpose of proposed change

The Council is obliged to set a balanced budget and council tax charge in accordance with the Local Government Finance Act 1992.

This equalities impact assessment relates to the 2024-25 revenue budget proposals regarding:

A council tax increase of 2.99% and a 2% increase in the adult social care precept levy. These are to the Council's element of council tax (the Greater London Authority sets the increase level to the GLA element).

Demand pressures, inflation and proposed savings.

Legacy financial issues and budget corrections.

#### **Context for Change**

##### ***Changing Demographics***

Data from the 2021 census shows that Croydon's population has grown by 7.5% since the 2011 census to 390,800. This is slightly lower than the increase for London (7.7%). Other comparative data from 2021 Census:

- Croydon ranked 16th for total population out of 309 local authority areas in England.
- Croydon has the highest population in London.
- The number of households has increased to close to 160,000 compared to 145,000 recorded in Census 2011.
- Croydon is the 10th least densely populated of London's 33 local authority areas.

In Croydon,

- 52% of the population are female.
- 19.3% of the population are under 15 years and 13.6% over 65 years.

Based on the age bandings for delivering services in Croydon:

- 23.1% of residents in Croydon are aged 0-17 years.

***A council tax increase of 2.99% and a 2% increase in the adult social care precept levy.***

In December 2023 the provisional Local Government Finance Settlement was published by the Department for Levelling Up, Housing and Communities (DLUHC). As part of that settlement announcement, DLUHC indicated the level of increase in council tax, or, the council tax cap that councils can consider charging. For most councils in the country the cap is a 4.99% increase to council tax bills (for the council element).

The scale of our financial problems means that we must look at every option possible to protect vital services. In addition, it is important that all residents are supported to pay the council tax due for their households. The council has a Council Tax Support Scheme in place to support those on low incomes and has proposed as part of this budget a continuation of the additional Hardship Fund set up in 2023-24 which has been available for households struggling to pay the extra council tax increase in 2023-24. The council takes an ethical approach to council tax collection focussing on collecting debts swiftly from households that can pay and supporting households that are struggling to make ends meet.

***Demand pressures, inflation and proposed savings.***

Adult social care accounts for more expenditure at Croydon than any other service (30% of net budget). The demographic pressures in this area are felt across the country with an increasing number of service users and increasing complexity of needs. The proposed budget includes adult social care demographic growth of £4.5m for 2024-25. This 4% growth in budget reflects recognised best practice for local councils to plan for demand led pressures in adult social care.

However, we know that our adult social care cost base is too high and we can learn from other Councils, so the proposed budget also includes transformation savings of £5.0m in 2024-25. These will be delivered through a mixture of ensuring packages of care are reviewed, meeting an individual's current needs and through managing demand, leading to better outcomes for better value. The medium term financial strategy (MTFS) also includes indicative savings of £4.0m for 2025-26 and 2026-27, which will be reviewed following completion of a diagnostic review of the Adult Social Care and Health directorate with an external delivery partner.

The service offer remains the same, as outlined in the principles below:

Adult social care services reflect the relevant legislation underpinning social care and health through the Care Act (2014).

- All packages are assessed or reviewed, proportionately, through a strengths-based approach, considering safeguarding, to meet the needs of the individual and carers.
- Residents can access appropriate services provided in-house or commissioned by the Council, or delivered independently by the voluntary and community sector.
- Where people have the financial means to pay a contribution, or to pay for their care in full, this will be in line with the self-funding legislations outlined in the Care Act and wider national policy.

Within Council services supporting Children, Young People, Families and Education there are proposals to improve the effectiveness of services as part of the Corporate Parenting Transformation Programme. This includes reducing the cost of Children Looked After placements through increasing foster care provision and these are not expected to have a negative impact on residents/clients.

Directorates have drafted equality impact assessments (EQIAs) for proposed savings and these will be reviewed prior to implementation of changes. Where there are savings relating to restructures, the separate EQIAs will be shared with trade unions and affected staff as part of consultation processes. The appendix to this EQIA includes an overview of the officer make up of various protected groups (from data presented to the Council's Equality Diversity and Inclusion Board in January 2023).

Changes to fees & charges were presented to Cabinet on 6 December 2023 with a separate EQIA accompanying the report.

The proposed budget includes growth to take account of inflationary pressures across both pay inflation (staffing) and non-pay inflation (contracts for external services). There is specific growth proposed to strengthen staffing in strategic finance, resilience and emergency planning, and contract management for large contracts. There is also growth to meet demand and cost pressures impacting Special Education Needs transport, the Council's contribution to the Transport for London freedom pass scheme and insurance premiums.

### ***Legacy financial issues and budget corrections***

The legacy financial issues that Croydon Council are facing are well documented. Within the Revenue Budget there are proposals to ensure that services are funded at the appropriate level and from the appropriate budget(s). These include growth to realign the public health grant contribution budgets for libraries and physical activities, realign the staffing recharge budgets for the highways service, and Housing Benefit subsidies. Whilst these have an impact on the budget overall, they do not directly impact on service changes and therefore do not impact on protected characteristics.

### 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**

	<p>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.</p> <p>PLEASE NOTE: As this report covers a wide range of Council services, the equalities impact caused by changes will differ in line with the service in question, and the demographics of those individuals &amp;/or communities who use or benefit from the service.</p>		
Protected characteristic group(s)	Negative impact	Positive impact	Source of evidence
Age	<p>The Revenue Budget and Council Tax Levels 2024-25 may have impacts that vary across this protected characteristic group. In some cases the impact may be significantly greater than for other residents. The mitigations for any potential negative impacts are laid out in section five of this report.</p> <p>Savings are proposed from placement costs for adults and looked after children. This is primarily achieved through gatekeeping controls on costs at the point of identifying suitable placements and ensuring effective</p>	<p>The budget seeks to reduce spend on placements for adults and looked after children. More adults will be able to live independently in the community and less children will be exposed to the negative impacts of being 'in care'.</p>	<p>Croydon's population continues to age with those over 65 increasing by 19.7% since the 2011 Census. The median age also increased by two years, from 35 to 37 years of age.</p> <p>The borough data regarding age is as follows:</p> <ul style="list-style-type: none"> <li>• 97,900 0-19 year olds. This is the highest in London. (2021 Census)</li> <li>• 239,700 20-64 year olds. This is the highest in London. (2021 Census)</li> <li>• 53,100 65+ year olds. This is the 3rd highest in London. (2021 Census)</li> </ul>

support is provided to enable adults to continue to live independently in the community and children to remain living at home or within their wider family network. The Council will continue to meet statutory needs in line with social care legislation.

Proposed changes to the council tax Care Leavers Relief Scheme include Croydon Council not providing council tax reduction for young people leaving care who are placed by other Local Authorities (LAs) to live in Croydon. A separate EQIA has been completed in relation to proposed changes to the Scheme.

The Council will continue to support Croydon's young people leaving care by providing a 100% reduction in their Council Tax liability (bill) from the age of 18 to 24 inclusive. Nationally each LA has a corporate parenting responsibility for their own care leavers, so Croydon expects that where another LA has corporate parenting responsibility for a care leaver, they provide the support to the care leaver. This is normal practice for London councils and Croydon is currently an outlier in this regard.

Currently Croydon residents who have a care leaver living with them also receive a 100% reduction in their Council Tax liability. Proposed changes to the Care Leavers Relief Scheme include only care leavers where they are named as a liable party. Awarding a reduction to residents who have care leavers living with them and the care leaver is not responsible (liable) to pay the Council Tax is not direct support to the care leaver and other Councils do not do this.

A 'Staying Put' arrangement is when a young person who was previously in Croydon's care remains with their former foster carer/s after their eighteenth birthday, normally up until 21. Supporting young people into early adulthood through Staying Put is one of the priorities in the Croydon Care Experienced Young People Strategy 2023-25 agreed at Cabinet in October 2023.

Feedback from the consultation is clear that removing council tax support could dissuade foster carers from entering new Staying Put arrangements and disadvantage those who currently provide this continuity and support for young people into early adulthood.

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 the take up of these arrangements.

A separate EQIA has been completed in relation to fees and charges (which were presented to Cabinet on 6 December 2023). The change in fees is unlikely to have any impact on this protected characteristic group that is greater than any other resident. Adult Social Care users are subject to a means tested financial assessment which will assess affordability to contribute, or not, to service provision required (as defined by the Care Act 2014).

<p>Disability</p>	<p>The Revenue Budget and Council Tax Levels 2024-25 may have an impact on this protected characteristic group that is significantly greater than any other resident. The mitigations for any potential negative impacts listed below are laid out in section five of this report.</p> <p>A separate EQIA has been completed in relation to fees and charges (which were presented to Cabinet on 6 December 2023). The change in fees is unlikely to have any impact on this protected characteristic group that is greater than any other resident.</p> <p>External factors mean some disabled residents face higher costs in areas such as energy use, which may in turn impact their ability to meet any increased costs proposed by Croydon Council.</p> <p>Residents that are in receipt of 100% Council Tax reduction will not be impacted by the increase in Council Tax. The increase in Council Tax will impact those in receipt of partial reduction for their Council Tax. Therefore, it is reasonable to expect those in receipt of partial Council Tax Support to be impacted by a rise in Council Tax, and the mitigating factors shown later in the EQIA will therefore be essential to supporting this group of residents.</p>		<table border="1" data-bbox="1509 108 2085 619"> <thead> <tr> <th>Disability</th> <th>Croydon</th> </tr> </thead> <tbody> <tr> <td>Total: All usual residents</td> <td>390,719</td> </tr> <tr> <td>Disabled under the Equality Act</td> <td>54,852</td> </tr> <tr> <td>Disabled under the Equality Act: Day-to-day activities limited a lot</td> <td>23,716</td> </tr> <tr> <td>Disabled under the Equality Act: Day-to-day activities limited a little</td> <td>31,136</td> </tr> <tr> <td>Not disabled under the Equality Act</td> <td>335,867</td> </tr> <tr> <td>Not disabled under the Equality Act: Has long term physical or mental health condition but day-to-day activities</td> <td>21,978</td> </tr> <tr> <td>Not disabled under the Equality Act: No long term physical or mental</td> <td>313,889</td> </tr> </tbody> </table> <p>Employment rates for disabled people, across all ages, are significantly lower than those of non-disabled people.</p> <p><a href="https://www.gov.uk">The employment of disabled people 2021 - GOV.UK (www.gov.uk)</a></p> <p>In 28% of Council Tax Support claims either the claimant or partner are disabled and neither are in work, and 3% of claims are classified as disabled working claims meaning either the claimant or partner are disabled and either are in work.</p> <p>(Source: Croydon Council Tax Support Scheme EQIA, 2023)</p>	Disability	Croydon	Total: All usual residents	390,719	Disabled under the Equality Act	54,852	Disabled under the Equality Act: Day-to-day activities limited a lot	23,716	Disabled under the Equality Act: Day-to-day activities limited a little	31,136	Not disabled under the Equality Act	335,867	Not disabled under the Equality Act: Has long term physical or mental health condition but day-to-day activities	21,978	Not disabled under the Equality Act: No long term physical or mental	313,889
Disability	Croydon																		
Total: All usual residents	390,719																		
Disabled under the Equality Act	54,852																		
Disabled under the Equality Act: Day-to-day activities limited a lot	23,716																		
Disabled under the Equality Act: Day-to-day activities limited a little	31,136																		
Not disabled under the Equality Act	335,867																		
Not disabled under the Equality Act: Has long term physical or mental health condition but day-to-day activities	21,978																		
Not disabled under the Equality Act: No long term physical or mental	313,889																		



<p>Sex</p>	<p>The Revenue Budget and Council Tax Levels 2024-25 are unlikely to have any impact on this protected characteristic group that is greater than any other resident unless a service is utilised by one sex more than another.</p> <p>A separate EQIA has been completed in relation to fees and charges (which were presented to Cabinet on 6 December 2023). The change in fees is unlikely to have any impact on this protected characteristic group that is greater than any other resident.</p>		<p>203,000 (51.9%) residents in Croydon are female and 187,600 are male (48.1%).</p> <p>(Source 2021 Census)</p> <p>Of 16,260 Council Tax Support single claims by females, 11,795 are from working age claimants and of the 6,263 male claims 4,187 are working age.</p> <p>(Source: Croydon Council Tax Support Scheme EQIA, 2023)</p>
<p>Gender reassignment/identity</p>	<p>The Revenue Budget and Council Tax Levels 2024-25 are unlikely to have any impact on this protected characteristic group that is greater than any other resident.</p> <p>A separate EQIA has been completed in relation to fees and charges (which were presented to Cabinet on 6 December 2023). The change in fees is unlikely to have any impact on this protected characteristic group that is greater than any other resident.</p>		<p>According to the ONS Census 2021, of all the Croydon residents aged 16 years and over who responded, 91.6% stated that their gender identity was the same as their sex registered at birth.</p> <p>7.5% of those who responded did not answer the gender identity question.</p> <p>Only 0.9% stated that they had a different gender identity.</p>

<p>Marriage or Civil Partnership</p>	<p>The Revenue Budget and Council Tax Levels 2024-25 are unlikely to have any impact on this protected characteristic group that is greater than any other resident.</p> <p>A separate EQIA has been completed in relation to fees and charges (which were presented to Cabinet on 6 December 2023).</p> <p>The changes in registrars' fees may negatively impact residents based on their intention of entering into marriage or civil partnership. However, the cost of an average wedding is approximately £17,000, therefore the impact of a change in registrars fees is considered to be minimal in comparison to these other potential costs associated with getting married/having a Civil Partnership.</p> <p>The Council offers different burial plots which could be purchased more by people in this protected characteristic group (e.g. double plot may be more popular with those residents that are married or in a civil partnership). However, the fee increase is consistent and therefore there is no impact considered for this protected characteristic.</p>		<p>The borough data on marital status is as follows:</p> <ul style="list-style-type: none"> <li>• 32.8% Married</li> <li>• 34.1% Single</li> <li>• 8.5% Divorced or Separated</li> <li>• 3.7% Widowed</li> <li>• 20.6% No response to question</li> </ul> <p>493 people were registered in a same sex civil partnership. 279 people were registered in an opposite sex civil partnership.</p> <p>(Source: Census 2021)</p> <p>4107 (15%) claims of Croydon's Council Tax Support Scheme current case load are those made by couples, the remaining 22,559 (85%) are from single claimants.</p> <p>Whether or not the couples are married or in a civil partnership, or are unmarried partners does not affect the way the claims are calculated. We do not hold specific details regarding if a couple are married or not as we do not ask that specific question in our application form, rather if they have a partner.</p> <p>(Source: Croydon Council Tax Support Scheme EQIA, 2023)</p>
--------------------------------------	--	--	--

Religion or belief	<p>The Revenue Budget and Council Tax Levels 2024-25 are unlikely to have any impact on this protected characteristic group that is greater than any other resident.</p> <p>A separate EQIA has been completed in relation to fees and charges (which were presented to Cabinet on 6 December 2023).</p> <p>The changes in bereavement fees may impact residents based on their religion or belief. However, the fee increases are in line with CPI inflation (with rounding for practical purposes) or below CPI inflation and the percentage change between burial and cremation is consistent. Therefore, no impact is anticipated for this protected characteristic group.</p> <p>In relation to registrars' fees, marriage rates may vary by religious groups and therefore it could be suggested that the change in fee would impact this group more. However, and as set out above, the registrars fee is a small proportion of the cost of the average wedding and therefore the change is considered to have minimal impact.</p>		<p>The predominant religion of Croydon is Christianity. According to the <a href="#">2021 census</a>, the borough has over 190,880 Christians (48.9%), 40,717 Muslims (10.4%) and 23,145 Hindu (5.9%) residents.</p> <p>101,119 (25.9%) Croydon residents stated that they are <a href="#">atheist</a> or <a href="#">non-religious</a> in the 2021 Census.</p> <p>6.9% did not answer the question on religion.</p>
--------------------	---	--	--

<p>Race</p>	<p>The Revenue Budget and Council Tax Levels 2024-25 may have an impact on this protected characteristic group that is significantly greater than any other resident.</p> <p>Residents who identify as Black are the largest group in receipt of Council Tax support (although nearly half of recipients have not declared).</p> <p>Residents that are in receipt of 100% council tax reduction will not be impacted by the increase in council tax. The increase in council tax will impact those in receipt of partial reduction for their council tax.</p> <p>A separate EQIA has been completed in relation to fees and charges (which were presented to Cabinet on 6 December 2023). The change in fees is unlikely to have any impact on this protected characteristic group that is greater than any other resident.</p>		<p>Broad Ethnic Group Changes in Croydon from Census 2011 to Census 2021</p> <table border="1" data-bbox="1464 181 2125 357"> <thead> <tr> <th></th> <th>White</th> <th>Black</th> <th>Asian</th> <th>Mixed</th> <th>Other</th> </tr> </thead> <tbody> <tr> <td>2011</td> <td>55.1 %</td> <td>20.2 %</td> <td>16.4 %</td> <td>6.6%</td> <td>1.8%</td> </tr> <tr> <td>2021</td> <td>48.4 %</td> <td>22.6 %</td> <td>17.5 %</td> <td>7.65</td> <td>3.9%</td> </tr> </tbody> </table> <p>In 2021, 22.6% of Croydon residents identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category, up from 20.2% in 2011. The 2.5 percentage-point change was the largest increase among high-level ethnic groups in this area.</p> <p>Across London, the percentage of people from the "Black, Black British, Black Welsh, Caribbean or African" ethnic group increased from 13.3% to 13.5%, while across England the percentage increased from 3.5% to 4.2%.</p> <p>In 2021, 48.4% of people in Croydon identified their ethnic group within the "White" category (compared with 55.1% in 2011), while 17.5% identified their ethnic group within the "Asian, Asian British or Asian Welsh" category (compared with 16.4% the previous decade).</p> <p>The percentage of people who identified their ethnic group within the "Mixed or Multiple" category increased from 6.6% in 2011 to 7.6% in 2021.</p>		White	Black	Asian	Mixed	Other	2011	55.1 %	20.2 %	16.4 %	6.6%	1.8%	2021	48.4 %	22.6 %	17.5 %	7.65	3.9%
	White	Black	Asian	Mixed	Other																
2011	55.1 %	20.2 %	16.4 %	6.6%	1.8%																
2021	48.4 %	22.6 %	17.5 %	7.65	3.9%																

### Languages in Croydon

According to the Census 2021,

- 84.0% of the residents who can speak in Croydon speak English as their first language.
- 7.8% speak a European language.
- 6.3% speak an Asian language.

Where a Council Tax Support Scheme claimant has provided their race this has been recorded and the current caseload is broken down as follows:

	Number	% of caseload
Asian or Asian British: Bangladeshi	162	1%
Asian or Asian British: Indian	387	1%
Asian or Asian British: Pakistani	546	2%
Asian or British : Any other Backgrnd	571	2%
Black-Black British:African	2098	7%
Black-Black British:Caribbean	2426	8%
Black-Black British:Other	2433	8%
Chinese	55	0%
Mixed :Any other mixed background	252	1%
Mixed: White and Asian	235	1%
Mixed: White and Black Caribbean	460	2%
White: British	4755	17%
White: Any other White background	1203	4%
Not Known	13077	46%
<b>Total</b>	<b>28660</b>	

(Source: Croydon Council Tax Support Scheme EQIA, 2023)

<p>Sexual Orientation</p>	<p>Our data does not identify that any of the proposed changes are anticipated to impact this protected characteristic group more than other residents with regard to the majority of services. However we are improving our data collection and usage in this area to ensure that our services pay due regard to sexual orientation.</p> <p>A separate EQIA has been completed in relation to fees and charges (which were presented to Cabinet on 6 December 2023). The change in fees is unlikely to have any impact on this protected characteristic group that is greater than any other resident.</p>		<p>According to the ONS Census 2021, of the residents aged 16 years and over who responded to the survey:</p> <ul style="list-style-type: none"> <li>• 87.8% self-classified as Straight or Heterosexual.</li> <li>• 1.5% stated they were Gay.</li> <li>• 1.2% stated they were Bi-Sexual</li> <li>• 0.4% stated All other sexual orientations</li> <li>• 9.1% did not respond to the question</li> </ul> <p>Within the current Council Tax Support Scheme caseload there are 4,107 claims made by couples, of those 29 are from couples where each partner is of the same sex.</p> <p>We do not ask for details of claimants' sexual orientation as part of the application process, so are unable to identify the breakdown for those who have made a single application form.</p> <p>(Source: Croydon Council Tax Support Scheme EQIA, 2023)</p>
<p>Pregnancy or Maternity</p>	<p>The Revenue Budget and Council Tax Levels 2024-25, including changes to fees &amp; charges, may impact residents that are pregnant or on maternity if they are not working.</p> <p>However, additional benefits are provided for residents in this situation and therefore the proposed changes are expected to have minimal impact.</p> <p>Due regard will be taken to ensure that any proposed organisational restructures consider the impact on pregnancy/maternity through a separate equality impact assessment.</p>	<p>The development of Family Hubs, bringing services closer to families, may provide benefit to those on maternity.</p>	<p>There were 5,252 births in Croydon in 2020. An estimated 30,000 women lose their jobs as a result of pregnancy every year, according to the Equality and Human Rights Commission (EHRC).</p> <p>We currently have 38 active Council Tax Support Scheme claims where the claimant or partner are in receipt of maternity pay which is recorded on our system.</p> <p>We do not record if someone is pregnant at the time of application.</p> <p>(Source: Croydon Council Tax Support Scheme EQIA, 2023)</p>

	<p>Note: Data disaggregating level of service use by protected characteristic group is unavailable or available in sufficient granularity to draw conclusions in many cases. This will be explored and refined iteratively to inform mitigating strategies wherever practical to do so.</p> <p><b>Important note:</b> 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.</p> <p>See mitigations in Section 5.</p> <p>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. <b>Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact.</b></p>
--	---

### 3.2 Additional information needed to determine impact of proposed change

**Table 2 – Additional information needed to determine impact of proposed change**

<p>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:</p>		
Additional information needed and or Consultation Findings	Information source	Date for completion
<p>The Council’s current data collection of protected characteristics is weak in some areas and rich in others. We are currently carrying out a project to tackle this imbalance with the support of the Head of Profession for Business Intelligence and the Equalities Manager as well as analysts and services across the organisation.</p> <p>The Corporate Management Team and the Equality, Diversity and Inclusion Board are the driving force behind this work stream.</p> <p>Currently an ‘as is’ exercise is taking place to identify areas of weakness in collection that needs to be addressed. This will be followed by a ‘to be’ looking at the information across the Council that we will want to collect and how we go about doing this. Due to having to implement the new process for collection this project will take place in phases.</p>	<p>Index of Deprivation by Lower Layer Super Output Areas (gov.uk). Other data sources to be identified and investigated.</p>	<p>Iterative</p>

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

					Severity of Impact	3	3	6	9
						2	2	4	6
						1	1	2	3
		1	2	3					
		Likelihood of Impact							

Risk Index	Risk Magnitude
- 9	High
- 5	Medium
- 3	Low

**Key**



## Equality Analysis

**Table 3 – Impact scores**

Note: The data to populate this table is not available to inform the Equality Impact Score. Evidence for the above is drawn from the Index of Deprivation Score for the 5% most deprived areas in the country and should not be used to draw conclusions. Further research is planned to develop a more reliable indicator. And as stated previously, fee changes were presented to Cabinet on 6 December 2023 with their own EQIA assessment, the table below represents a generic view:

The scores below have been taken on the basis of the Council Tax decision impacting on all residents, and therefore impacting on residents with protected characteristics. These scores are not intended to suggest that protected characteristic groups will be impacted more than others.

Column 1 PROTECTED GROUP	Column 2 LIKELIHOOD OF IMPACT SCORE	Column 3 SEVERITY OF IMPACT SCORE	Column 4 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.  <b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</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>	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	2	6
Disability	3	2	6
Sex	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

# 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:

### Mitigations

An increase in Council Tax will impact all residents who pay. It appears that there is no significant disproportionate impact on groups or individuals that share one or more protected characteristic. With regard to the increase in Council Tax there are four specific key mitigations:

- The Council's Council Tax Support Scheme for those with a low income.
- The Revenue Budget proposals include plans to continue the hardship fund set up in 2023-24 to support residents who are not eligible for Council Tax Support but who are finding it hard to pay their full increase in Council Tax.
- The dedicated information hub to [help with the rising cost of living](#) available on the Council's website.
- The Council's ethical approach to council tax collection.

## Equality Analysis

With regard to the wider impact from increases in Council Tax and fees & charges, and cost of living pressures, the Council has in place various schemes to support residents who experience financial difficulty, some of whom will fall within the protected characteristic groups and may be affected by the proposed increases, to help mitigate impact. Listed below are some examples of what support is currently available, taken from a wide range of support schemes across the Council.

- The Council has a statutory duty to protect those on low, or no income, and supports with claims for Council Tax support, Housing Benefit and Universal Credit.
- Council tax discount for care leavers, single person occupier, residents with disabilities and full-time students.
- Benefits calculator, to ensure residents receive the support to which they are entitled.
- Discretionary support for residents in financial hardship, including the Household Support Fund.
- Housing Revenue Account (HRA) discretionary fund targeted for tenants that are not in receipt of housing benefit.
  
- Healthy Homes is Croydon Council's free energy advice service aimed at Croydon residents on low incomes, and those more vulnerable to the effects of living in a cold home (especially families with young children, older residents, and residents with pre-existing medical conditions).
- Croydon Council Money Advice Service for advice on paying your bills and debt worries. All advice is independent and confidential.
- Croydon Works to help residents into employment or to receive training to support them into work and funding of the voluntary sector to provide advice and guidance.
  
- Free holiday activity clubs with healthy meals for children.
- The Council in partnership with Nimbus Disability offer a discount card to all children and young people on our disability register. The card is free and is part of a national access card scheme, giving benefits and discounts to facilities and activities across the country, such as leisure, sports and fitness, cinema, etc.
- There are discounted rates for all leisure centre activities for Croydon residents with disabilities. If a disabled person needs a carer with them in order to access leisure centre services, the carer is entitled to free entry.
- Croydon Council Leisure Centres offer discounted rates for residents Seniors 60+ years and Juniors 4-15 years.

## Equality Analysis

The cost of living information hub also signposts residents to a range of support provided by other organisations in Croydon, including:

- NHS Healthy Start vouchers for families.
- Free school meals.
- Support from voluntary, community and faith sector organisations.
- Support for businesses through the London Business Hub and the British Business Bank.
- CroydonPlus credit union which offers affordable ways to manage money, including savings accounts and loans.

The continuing review of Discretionary Housing Placements may impact residents, however a lack of data regarding protected characteristics means it is not currently possible to identify any impact to groups sharing protected characteristics. Further work will be undertaken by the service to improve data collection. In terms of mitigation, every household will be given the appropriate financial support or advice to help them move into alternative private rented sector accommodation.

**In respect of specific proposals, it is likely that some proposals may result in new policy or service changes. In this instance each proposal will be accompanied by an equality analysis and/or consultation which will inform the final proposal and its implementation, on a case by case basis.**

## Equality Analysis

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions to mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Age	<ol style="list-style-type: none"> <li>1. Savings are proposed from placement costs for adults and looked after children.</li> <li>2. Croydon Council not providing council tax reduction for young people leaving care who are placed by other Local Authorities (LAs) to live in Croydon.</li> <li>3. Croydon Council not providing council tax reduction for carers with Staying Put arrangements (a young person who was previously in Croydon's care remains with their former foster carer/s after their eighteenth birthday, normally up until 21).</li> </ol>	<ol style="list-style-type: none"> <li>1. The Council will continue to meet needs and statutory duties, and the gatekeeping of such services will be governed by policy and procedures that ensure fair treatment of protected groups. A separate EQIA/s will be completed before implementation of any service changes which are proposed following review of service commissioning/contracts.</li> <li>2. Targeted consultation has been carried out with young people leaving care. The impacted young people leaving care will be contacted and recommended to apply to their placing LAs for support. London LAs will be contacted to inform them of the change and recommending for them to contact their impacted young people leaving care to provide support.</li> <li>3. 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 the take up of these arrangements.</li> </ol>	<ol style="list-style-type: none"> <li>1. Corporate Director (ASCH) and Corporate Director (CYPE)</li> <li>2. Head of Payments, Revenues, Benefits &amp; Debt</li> <li>3. Corporate Director (CYPE)</li> </ol>	<ol style="list-style-type: none"> <li>1. Proposal specific EQIAs as required from 06/03/24</li> <li>2. 22/03/24</li> <li>3. 22/03/24</li> </ol>

## Equality Analysis

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	1. External factors mean some disabled residents face higher costs in areas such as energy use, which may in turn impact their ability to meet any increased Council Tax costs.	1. The Council will continue to promote access to available support (as detailed in the mitigations in section 5 above), including on the back of Council Tax bills. Potential sources of support include the Council Tax Support Scheme, Household Support Fund and the Hardship Fund.	1. Head of Payments, Revenues, Benefits & Debt	1. Ongoing.
Sex	N/A	N/A	N/A	N/A
Gender reassignment / identity	N/A	N/A	N/A	N/A
Marriage / Civil Partnership	N/A	N/A	N/A	N/A
Sexual orientation	N/A	N/A	N/A	N/A
Religion or belief	N/A	N/A	N/A	N/A
Race	1. Impact of Council Tax increase. Residents who identify as Black are the largest group in receipt of Council Tax support (although nearly half of recipients have not declared).	1. The Council will continue to promote access to available support (as detailed in the mitigations in section 5 above), including on the back of Council Tax bills. Potential sources of support include the Council Tax Support Scheme, Household Support Fund and the Hardship Fund.	1. Head of Payments, Revenues, Benefits & Debt	1. Ongoing.
Pregnancy or maternity	N/A	N/A	N/A	N/A

## Equality Analysis

Table 6. Decision on 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>	
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> <p>Whilst changes in fees and charges may impact in some cases, this impact is considered to be minimal as set out in the information above.</p> <p>Mitigations and adjustments are already in place to support residents that may help them manage debt or financial vulnerability detailed. This includes signposting and discretionary support.</p> <p>Service departments will need to collate data on their service users to monitor impact. Some departments will have existing service level data regarding some protected characteristics and not others. Where data does not currently exist, each service must create an action around collecting data across all protected characteristics. As data is received the EQIA should be updated, demonstrating data and evidence where change has been made.</p> <p>Residents should be provided with details of support organisations in both digital and non-digital formats</p>	X

## Equality Analysis

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.	
Will this decision be considered at a scheduled meeting? MAB / Cabinet	Meeting title: Cabinet and Council Date: Cabinet: 14 February 2024; Council: 28 February 2024	

### 7. Sign-Off

<b>Officers that must approve this decision</b>	
<b>Equalities Lead</b>	<b>Name: Helen Reeves</b> <b>Date: 05/02/2024</b> <b>Position: Interim Head of Strategy and Policy</b>
<b>Corporate Director</b>	<b>Name: Jane West</b> <b>Date: 05/02/2024</b> <b>Position: Corporate Director of Resources and s151 Officer</b>



# Equality Analysis

## Appendix: Deprivation data

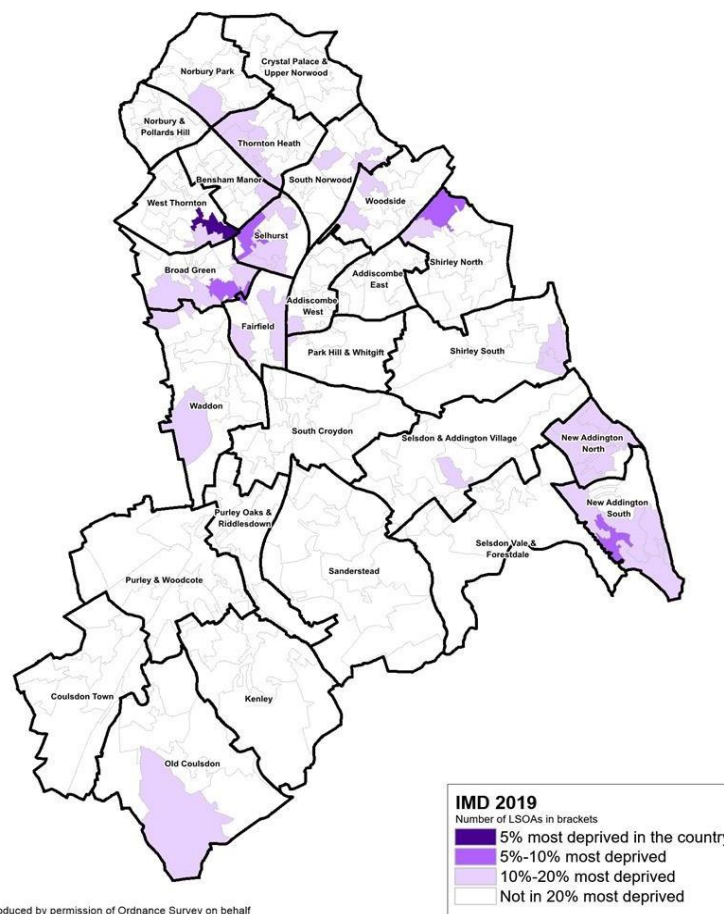
### INFOGRAPHIC 1

In Croydon, 1567 people live amongst the 5% most deprived in the country (Dark Blue)

In this area,

50% are male	(Croydon 49%)
27% are 0-15	(Croydon 22%)
30% are White ethnic group	(Croydon 55%)
35% are Black / African / Caribbean / Black British ethnic group	(Croydon 20%)
24% are Asian / Asian British ethnic group	(Croydon 16%)
7% are Mixed / multiple ethnic group	(Croydon 7%)
4% are Other ethnic group	(Croydon 2%)

Indices of Deprivation 2019  
Croydon Lower Super Output Areas (LSOAs)



Reproduced by permission of Ordnance Survey on behalf of HMSO. © Crown copyright and database right 2019. OS Licence number 10001927

# Equality Analysis

## Appendix: Croydon Council staff data

Ethnicity							
Directorate	Any other	Asian Group	Black Group	Mixed Group	Undisclosed	White Group	Grand Total
Adult Social	0.36%	1.37%	4.95%	0.74%	2.67%	2.23%	12.31%
Assistant	0.33%	1.88%	3.35%	0.58%	2.82%	3.10%	12.06%
Children	0.61%	3.48%	8.71%	1.85%	5.94%	7.62%	28.21%
Housing	0.10%	1.37%	3.55%	0.69%	2.97%	2.13%	10.81%
Resources	0.13%	1.22%	1.80%	0.46%	1.40%	1.27%	6.27%
Sustainable	0.84%	5.92%	5.76%	1.68%	6.80%	9.34%	30.34%
<b>Grand Total</b>	<b>2.36%</b>	<b>15.23%</b>	<b>28.13%</b>	<b>5.99%</b>	<b>22.59%</b>	<b>25.69%</b>	<b>100.00%</b>

Sex					
Directorate	Female	Male	Undisclosed	Prefer to self-describe	Grand Total
Adult Social	7.39%	2.59%	2.34%	0.00%	12.31%
Assistant	6.25%	3.58%	2.23%	0.00%	12.06%
Children	17.39%	5.74%	5.03%	0.05%	28.21%
Housing	4.72%	3.63%	2.44%	0.03%	10.81%
Resources	2.77%	2.28%	1.19%	0.03%	6.27%
Sustainable	14.24%	9.93%	5.94%	0.23%	30.34%
<b>Grand Total</b>	<b>52.75%</b>	<b>27.75%</b>	<b>19.17%</b>	<b>0.33%</b>	<b>100.00%</b>

Disability				
Directorate	No	Yes	Undisclosed	Grand Total
Adult Social	10.26%	1.09%	0.96%	12.31%
Assistant	9.98%	0.84%	1.24%	12.06%
Children	23.48%	1.90%	2.82%	28.21%
Housing	9.06%	0.58%	1.17%	10.81%
Resources	5.23%	0.46%	0.58%	6.27%
Sustainable	24.75%	2.36%	3.22%	30.34%
<b>Grand Total</b>	<b>82.76%</b>	<b>7.24%</b>	<b>10.00%</b>	<b>100.00%</b>

## Equality Analysis

Sexual Orientation							
Directorate	Bi-sexual	Gay man	Hetrosexual /straight	Lesbian/gay woman	Other	Undisclosed	Grand Total
Adult Social	0.20%	0.15%	8.89%	0.00%	0.08%	3.00%	12.31%
Assistant	0.20%	0.10%	8.66%	0.15%	0.05%	2.89%	12.06%
Children	0.71%	0.38%	20.31%	0.33%	0.18%	6.30%	28.21%
Housing	0.20%	0.20%	7.51%	0.03%	0.03%	2.84%	10.81%
Resources	0.10%	0.05%	4.52%	0.03%	0.08%	1.50%	6.27%
Sustainable	0.84%	0.74%	19.98%	0.33%	0.38%	8.07%	30.34%
<b>Grand Total</b>	<b>2.26%</b>	<b>1.62%</b>	<b>69.87%</b>	<b>0.86%</b>	<b>0.79%</b>	<b>24.60%</b>	<b>100.00%</b>

Age Range												
Directorate	20 or	21-25	26-30	31-35	36-40	41-45	46-50	51-55	56-60	61 or older	Undisclosed	Grand Total
Adult Social	0.18%	1.35%	1.35%	1.17%	1.17%	1.27%	1.07%	1.12%	0.69%	0.28%	2.69%	12.31%
Assistant	0.36%	1.85%	1.83%	1.29%	0.84%	1.04%	0.81%	0.74%	0.53%	0.18%	2.59%	12.06%
Children	0.33%	3.94%	4.95%	3.76%	2.77%	2.16%	1.90%	1.52%	0.58%	0.48%	5.81%	28.21%
Housing	0.18%	1.55%	1.83%	1.62%	1.27%	0.71%	0.30%	0.43%	0.20%	0.05%	2.67%	10.81%
Resources	0.08%	1.09%	1.02%	0.53%	0.74%	0.48%	0.33%	0.30%	0.23%	0.13%	1.35%	6.27%
Sustainable	1.14%	4.57%	4.01%	3.35%	2.59%	2.21%	2.13%	1.88%	1.37%	0.58%	6.50%	30.34%
<b>Grand Total</b>	<b>2.26%</b>	<b>14.34%</b>	<b>14.98%</b>	<b>11.73%</b>	<b>9.37%</b>	<b>7.87%</b>	<b>6.55%</b>	<b>5.99%</b>	<b>3.60%</b>	<b>1.70%</b>	<b>21.60%</b>	<b>100.00%</b>