

Equality Analysis Form

**Croydon Public Health Approach to addressing
Violence Framework**

Delivering for Croydon

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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	Place
Title of proposed change	Croydon Public Health Approach to addressing Violence Framework
Name of Officer carrying out Equality Analysis	Gareth Llywelyn-Roberts

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

The Croydon Public Health Approach to addressing Violence Framework is a plan aimed at reducing and preventing violence before it occurs and using a range of interventions to support those who are most affected by violence to ensure that the continuum of violence is broken.

The proposed change is being described as a Framework, in recognition that this is a long term approach, requiring both flexibility and the ability to engage with a wide variety of partners to achieved sustained reduction in violence across all of our communities.

The Framework sets out 5 key themes which are at the core of the public health approach and 5 priority programmes which require immediate development and delivery.

Developing a Public Health Approach to addressing violence, specifically serious youth violence and knife crime is a corporate priority as set out in the Corporate Plan 2018-20. The outcomes being sought are:-

- Sustained reductions in knife crime and serious youth violence over a minimum 5 year period
- Reductions in high risk Domestic Abuse MARAC cases
- Early Identification of young people at risk of violent or aggressive behaviour and the provision of co-ordinated multi agency support programmes to reduce the risk.
- Reduction in temporary or permanent exclusion of primary age pupils

This is a new proposal.

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	<p>The Framework includes a focus on Elder Abuse, ensuring that the partner agencies and FJC have sufficient interventions to support victims of domestic violence elder abuse.</p> <p>The framework sets out early identification, targeted and intensive support for young people who are at risk of violence. The impact will be to reduce the risk factors and provide support to reduce aggressive or violent behaviour</p>	<p>There is a focus on young people up to the age of 24 who are at greater risk of serious violence including knife crime. This may provide a negative impression of young people in Croydon within this age range. However this is countered by the facts in relation to serious youth violence in terms of youth population.</p>	<p>MARAC cases of Elder abuse have risen by 4% in 2018 compared to 2017. This equates to 14% of MARAC cases</p> <p>Knife Crime with Injury where the victim is under 24 reduced by 27%. Croydon is ranked 9th highest of the 32 London Boroughs. Comparing the rate of offences per 1,000 of residents aged 1-24, Croydon has the 19th highest rate in London with 0.6 offences per 1,000 young people.</p> <p>Croydon ranks highest in London for Serious Youth Violence by volume of incidents due to the fact that the borough has one of the highest youth populations in the city (96,000). Based on</p>

			<p>the number of young people aged 1-19 living in the borough, Croydon is ranked 17th highest in London for Serious Youth Violence with 3.5 offences per 1,000 young people.</p> <p>18.7% of primary school aged children are eligible for and claiming free school meals, higher than the London average. This can be used as an indicator of deprivation, with fewer children receiving free school meals going on to achieve 5 A*-C grades at GCSE or going on to higher education.</p>
Disability	none	none	none
Gender	<p>Females remain the significantly highest percentage of victims of domestic abuse. The intervention programmes are designed to support families who are at risk of abusive relationships, including teenage parents, through early support, legal and practical advice and advocacy provision. The Croydon Family Justice Centre (FJC) is recognised nationally as best practice.</p>	<p>Males are identified as the key perpetrators of violence, particularly domestic abuse and weapon enabled crime. This is reduced by the focus on intervention programmes to addressing violent offending including, Divert programme for male offenders of domestic abuse, targeted and intensive support programmes for individuals involved in group violence knife and gun crime.</p>	<p>In 2018, 46% of teenage parents, supported by the Family Nurse Partnership had been abused by someone close to them.</p> <p>In 2018 the Croydon FJC dealt with 3,283 cases of domestic abuse, a 21% increase compared to 2017. High risk Multi Agency Risk Assessment Cases (MARAC) have also increased from 583 cases in 2017 to 606 cases in 2018.</p>

			There is a disproportionately high number of female victims of domestic abuse.
Gender Reassignment	none	none	none
Marriage or Civil Partnership	<p>The support programmes related to domestic abuse are available for all victims, including marriage and civil partnerships.</p> <p>Specialist services are in place to deal with forced marriage and to provide support to victims.</p>	none	none
Religion or belief	One of the key priorities of the Framework relates to a Recognition of the importance of culture and identity for families and young people. The priority recommends Culture and Identity Programmes are developed with voluntary and community sector agencies, working alongside schools and front line services as part of any intervention programme. This will ensure that any intervention is delivered in a way that does not create a division within or destabilise the dynamics of the family.	none	none
Race	<p>There are a disproportionate number of young people from BAME backgrounds who are affected by knife crime and serious youth violence in the borough, both as victims and offenders. There are also a higher proportion of young people from BAME backgrounds who have behavioural issues from early years through adolescents.</p> <p>The Framework sets out a series of wider social and emotional factors that determine this behaviour. It sets out intervention programme can increase inclusion and provide support when they can have maximum benefit</p>	<p>There is the potential that the disproportionate number of young people from BAME backgrounds affected by knife and serious youth violence, could give the impression that this is an issue predominately affecting the BAME community.</p> <p>However the Framework highlights the international evidence that wider factors such as deprivation, poor health, and wider societal determinates have a greater impact. The World Health Organisation key recommendations include:- <i>“Violence prevention strategies can address underlying causes such as low levels of education, harsh and inconsistent parenting,</i></p>	<p>The Vulnerable Adolescents Review published in February 2019 highlighted that of the cohort of 60 young people there was a disproportionate number of Black African, Black Caribbean and White and Black Caribbean boys.</p> <p>Approximately 9% of children will experience 4 or more Abusive Childhood Experiences (ACEs) and are a very much higher risk of experiencing worse outcomes as an adult. ACE's include child maltreatment and experiences of violence</p>

		<i>concentrated poverty, unemployment and social norms supportive of violence”</i>	<p>in the household. This is no reference to race as part of the ACE scoring.</p> <p>19 of the 60 children who form the VAR cohort had fixed term exclusion in Primary School. In 85% of cases the reason for exclusion was physical abuse. All 19 children who received a fixed term exclusion in primary school received a criminal conviction in later adolescents.</p>
Sexual Orientation	There is an acknowledgement that domestic abuse services need to be appropriate to all sexual orientation partnerships	none	none
Pregnancy or Maternity	none	none	none
<p>Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.</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. Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact</p>			

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
There has been consultation across a wide range of stakeholders. The consultation has been undertaken through 121 interviews, listening groups, attendance at	Safer Croydon Partnership Boards and sub group minutes Vulnerable Adolscents Review	Not applicable

<p>governance boards and sub groups, team meetings and community forums including:</p> <ul style="list-style-type: none"> • Safer Croydon Partnership and its sub-groups • Safeguarding Adults Board • Chair of the Croydon Safeguarding Children’s Partnership • Health and Wellbeing Board • Authors of the Vulnerable Adolescents Review • Metropolitan Police Service – South Borough Command Unit Management Team • Chair of the Croydon Safer Neighbourhood Board • Croydon Community Voluntary Action • Croydon BME Forum and the Serious Youth Violence and Communities Forum • Croydon Clinical Commissioning Group • Croydon University Hospital Executive leads • Familiy Functional Therapy Team • Family Nurse Partnership management team • Chief Executive – Whitgift Centre • Croydon Drop-In Young Women’s Group • Director of Public Health • Croydon Youth Offending Service Managers and Gangs Unit • Croydon FJC managers • Voluntary organisations including, Ment4, Palace for Life Foundation, Shpresa, Gloves not Guns, Croydon Drop-In, All Heads Recognised, Play Places, Music Relief, ANOS, JAGS Foundation • London VRU delivery leads • Heads of Community Safety for Bexley, Bromley, Greenwich, Lewisham and Sutton. • Croydon Council Management teams for Health and Social care, Children and Families, Corporate Strategy and Commissioning. • Executive Head- Harris Academy South Norwood. • London Assembly member for Croydon <p>The findings have been incorporated into the themes and priorities set out in the report. They are also included in the delivery model and the</p>	<p>Minutes of Adults Safeguarding Board Minutes of management and team meetings</p>	
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recommendation to use existing governance structures to performance manage the delivery of the themes and priorities by the most appropriate board.		

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

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

Key

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

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Table 3 – Impact scores

Column 1	Column 2	Column 3	Column 4
PROTECTED GROUP	<p>LIKELIHOOD OF IMPACT SCORE</p> <p>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.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>SEVERITY OF IMPACT SCORE</p> <p>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.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>EQUALITY IMPACT SCORE</p> <p>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.</p> <p>Equality impact score = likelihood of impact score x severity of impact score.</p>
Age	2	2	4
Disability	1	1	1
Gender	2	1	2
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	2	1	2
Religion or belief	2	2	4
Sexual Orientation	1	1	1
Pregnancy or Maternity	1	1	1

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4. Statutory duties

4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

☐

Eliminating unlawful discrimination, harassment and victimisation

☐

Fostering good relations between people who belong to protected characteristic groups

☐

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Important note: Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

Table 4 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	none			
Race		The Framework highlights the international evidence that wider factors such as deprivation, poor health, and wider societal determinates have a greater impact.	Director VRU	June 2020

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		<p>The World Health Organisation's key recommendations include:- <i>"Violence prevention strategies can address underlying causes such as low levels of education, harsh and inconsistent parenting, concentrated poverty, unemployment and social norms supportive of violence"</i></p> <p>As intervention and prevention programmes develop there will be focus on the underlying causal factors of violence, building an evidence base using de-personalised case history analysis developed through the VAR.</p> <p>An annual review will be produced which will highlight these underlying factors, enabling commissioners to focus on interventions that address the causes of violence.</p>		
Sex (gender)	none			
Gender reassignment	none			
Sexual orientation	none			
Age	There is a focus on young people up to the age of 24 who are at greater risk of serious violence including knife crime. This may provide a	The framework sets out early identification, targeted and intensive support for young people who are at risk of violence. The impact will be to reduce the risk factors and provide	Hannah Doughty Clive Seall	December 2019

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	<p>negative impression of young people in Croydon within this age range.</p> <p>However this is countered by the facts in relation to serious youth violence in terms of youth population. This significantly reduces Croydon's position in terms of serious youth violence. Croydon is ranked 17th highest in London for Serious Youth Violence with 3.5 offences per 1,000 young people.</p>	<p>support to reduce aggressive or violent behaviour.</p> <p>The council's Adolescents Service is integrating services and merging case management processes to ensure there is a multi-agency support programme from young people and families who are at risk. In addition, the council recently published its early years strategy and is establishing locality-based services to provide early help for young people and families.</p>		
Religion or belief	none			
Pregnancy or maternity	none			
Marriage/civil partnership	none			

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter X in column 3 (Conclusion) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.	
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	x

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	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 Commissioning Board (CCB) / Cabinet		Meeting title: Cabinet Date: 10 th June 2019

7. Sign-Off

Officers that must approve this decision			
Equalities Lead	Name:	Yvonne Okiyo	Date: 29.04.19
	Position:	Equalities Manager	
Director	Name:	Gareth Llywelyn-Roberts	Date: 02/05/19
	Position:	Interim Director Of Violence Reduction Network	