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	Croydon Digital Service
Title of proposed change	Croydon Digital Strategy
Name of Officer carrying out Equality Analysis	Opama Khan

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.

CROYDON DIGITAL STRATEGY

Croydon council is planning the digital future of the borough and in setting out its Digital Strategy, is planning our ambitions in the following areas:

- **Digital Council** How do you want to interact with the council online, to use our services and get more involved in decision making? Where can we improve the digital services we offer residents, businesses and communities?
- **Digital Services** How can we help Croydon thrive in the digital era? This includes broadband coverage, supporting people to develop digital skills, helping our tech sector grow, and innovation to enhance public spaces and improve quality of life.
- **Digital Borough** How should the council make better use of technology and data to become a more efficient, effective, and innovative organisation? Share your views here on how we can use digital to improve our ways of working.

As part of the strategy development, we have undertaken a number of exercises to ensure that our service and activities respond to the needs of our diverse resident base. In particular we have undertaken the following activities:

- Public consultation has been undertaken to ensure that we reach as many and diverse groups of residents as possible. Our aim has been to be inclusive of the various demographic groups. Our outreach has included online consultation via https://strategy.croydon.digital as well as direct consultation with members of the public at the Whitgift Shopping Centre and on Central Parade in New Addington. The CDS user research team has engaged with residents across all ages and demographic groups to gauge views on accessibility to council services and suggestions on how we can improve our services. We have also held a strategy workshop with croydon based tech businesses to get their input for our strategy.
- Digital inclusion our strategy lays out how we will support all people to learn basic digital literacy with a focus on some of our most vulnerable residents. CDS will work with the Localities team, Libraries and other stakeholders to improve digital literacy and accessibility.
- Assisted digital and offline alternatives to digital services the digital strategy will ensure nobody is disadvantaged by the shift to online services and residents are supported to access online services.
- Digital jobs/economy we are working to develop the education offer across the borough for all age and demographic groups
- Assistive technology there is commitment in the digital strategy to improve LBC's digital support to people with disabilities (including staff) and manage their physical and mental health.

What we will do:

- We will deliver universal digital services that all users can use
- We will ensure they are accessible to people with disabilities
- We will provide assisted digital support to help people use them
- We will ensure offline channels are available for all services
- We will provide training to help everyone access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations)
- We will work with our tech sector and the education sector to help residents into digital careers, including work experience and apprenticeships, with a specific aim to index higher on BAME people in tech in Croydon than national averages

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	Implementation of the digital strategy will improve accessibility to council services and provision across the borough	We will take steps to mitigate negative impact by ensuring provision to all age groups in the borough	Findings of public consultationuser research conducted by CDS

Appendix 2

Dischille	We will deliver universal digital services that all users can use. We will provide assisted digital support to help people use them	access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations)	- national research - local demographics information
Disability	Implementation of the digital strategy will improve accessibility to council services and provision across the borough for residents with physical disabilities and mental health issues - We will ensure they are accessible to people with disabilities - We will provide assisted digital support to help people use them	We will take steps to mitigate negative impact by ensuring provision to people with physical disabilities and mental health issues We will ensure offline channels are available for all services We will provide training to help everyone access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations)	 Findings of public consultation user research conducted by CDS national research local demographics information
Gender	 Implementation of the digital strategy will improve accessibility to council services and provision across the borough for all residents We will improve opportunities for females in tech education, skills and careers. We will raise the participation of female residents in tech education and careers in the borough 	We will take steps to mitigate negative impact by ensuring provision to all gender groups in the borough We will ensure offline channels are available for all services We will provide training to help everyone access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations)	 Findings of public consultation user research conducted by CDS national research local demographics information
Gender Reassignment	Implementation of the digital strategy will improve accessibility to council services and provision across the borough for all demographic groups - We will deliver universal digital services that all users can use - We will provide assisted digital support to help people use them	We will take steps to mitigate negative impact by ensuring provision to all demographic groups in the borough - We will ensure offline channels are available for all services - We will provide training to help everyone access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations)	 Findings of public consultation user research conducted by CDS national research local demographics information
Marriage or Civil Partnership	Implementation of the digital strategy will improve accessibility to council services and provision across the borough for all demographic groups - We will deliver universal digital services that all users can use	We will take steps to mitigate negative impact by ensuring provision to all demographic groups in the borough - We will ensure offline channels are available for all services	 Findings of public consultation user research conducted by CDS national research

Appendix 2

	We will provide assisted digital support to help people use them	We will provide training to help everyone access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations)	- local demographics information
Religion or belief	Implementation of the digital strategy will improve accessibility to council services and provision across the borough for all demographic groups - We will deliver universal digital services that all users can use - We will provide assisted digital support to help people use them	We will take steps to mitigate negative impact by ensuring provision to all demographic groups in the borough We will ensure offline channels are available for all services We will provide training to help everyone access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations)	 Findings of public consultation user research conducted by CDS national research local demographics information
Race	Implementation of the digital strategy will improve accessibility to council services and provision across the borough for all demographic groups - We will deliver universal digital services that all users can use - We will provide assisted digital support to help people use them - There is provision of access to translation services or google translate for those for whom English in not their first language	We will take steps to mitigate negative impact by ensuring provision to all demographic groups in the borough We will ensure offline channels are available for all services We will provide training to help everyone access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations) For individual services, we will access options based on individual user needs	 Findings of public consultation user research conducted by CDS national research local demographics information
Sexual Orientation	Implementation of the digital strategy will improve accessibility to council services and provision across the borough for all demographic groups - We will deliver universal digital services that all users can use - We will provide assisted digital support to help people use them	We will take steps to mitigate negative impact by ensuring provision to all demographic groups in the borough We will ensure offline channels are available for all services We will provide training to help everyone access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations)	 Findings of public consultation user research conducted by CDS national research local demographics information
Pregnancy or Maternity	Implementation of the digital strategy will improve accessibility to council services and provision across the borough for all demographic groups - We will deliver universal digital services that all users can use	We will take steps to mitigate negative impact by ensuring provision to all demographic groups in the borough - We will ensure offline channels are available for all services	 Findings of public consultation user research conducted by CDS national research

- We will provide assisted digital support to help people use them	We will provide training to help everyone access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations)	- local demographics information
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Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact

3.2 Additional information needed to determine impact of proposed change

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

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	Information source	Date for completion
PUBLIC CONSULTATION	https://strategy.croydon.digital	June 2019
Strategy Website CDS has created a Strategy website in order to undertake a public consultation and engage with the public		
Tech Sector Strategy Workshop CDS ran a Strategy consultation workshop with members of the Tech business community on 22 nd May 2019. The workshop was attended by 38 businesses		May 2019
Direct public consultation CDS has undertaken direct consultation with members of the public at the Whitgift Shopping Centre and on Central Parade in New Addington. The CDS user research team has engaged with residents across all ages and demographic groups to gauge views on accessibility to council services and suggestions on how we can improve our services.		May 2019
Our findings:		

	Appendix 2
Through our public consultation and our residents have identified that they want to have better and more efficient access to our services and our findings point to the fact that cost savings achieved can be used towards supporting our most vulnerable residents.	
 Specific issues raised through our public consultation: 7 people raised the need for better 'assisted digital' help for people who struggle to use council digital services 3 people raised the need for offline channels to remain available for all council services 2 people raised the need for the council to be inclusive/diverse in who we engage in consultations 1 person raised the need to make sure services are fully accessible 2 people raised the need for diversity within the CDS team 	
 Specific issues raised through our strategy workshop with Tec businesses: Developing a tech/digital talent pipeline from our own resident base focusing on skills offer at schools as well as further education institutions across the borough and be inclusive to attract more females and BME groups into technology careers. The need to develop a skills/ CPD offer for adults of all ages who are in work so that they can access career progression and jobs of the future The need to develop accessible services for our most vulnerable residents The need for a higher education offer accessible by residents across the borough and be inclusive to attract more females and BME groups into technology careers, as well as career development and progression for adults of all ages to access jobs of the future 	

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

Sev	Lik	elihood	of Impa	act
Severity of Impact		1	2	3
o o	1	1	2	3
<u>m</u>	2	2	4	6
act	3	3	6	9

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



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
Gender	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	
	he relevant box(es) to indicate whether the proposed change will adversely impact the Council's abilit lity Act 2010 set out below.	ry to meet any of the Public Sector Duties in the
Adva	ncing equality of opportunity between people who belong to protected groups	
Elimi	nating unlawful discrimination, harassment and victimisation	
Foste	ring good relations between people who belong to protected characteristic groups	
	rtant note: If the proposed change adversely impacts the Council's ability to meet any of the Public S tlined in the Action Plan in section 5 below.	ector Duties set out above, mitigating actions must

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	Our strategy explicitly makes the commitments to improve the net positive position relative to where we are now and therefore have a positive impact on them. We will take steps to mitigate negative impact by ensuring provision to all age groups in the borough	-	We will deliver universal digital services that all users can use Provision of digital inclusion to ensure that Croydon residents of all ages are supported to learn basic digital literacy, and access online services We will ensure provision is available on the front line to people of all ages via Schools, libraries, localities/gateway hubs, community centres, support through voluntary/3rd	Neil Williams	ongoing



Disability	Our strategy explicitly makes the commitments to improve the net positive position relative to where we are now and therefore have a positive impact on them. We will take steps to mitigate negative impact by ensuring provision to people with physical disabilities and mental health issues	sector groups, resident groups, job centre plus, croydon works, CALAT, Work & Health Programme, Housing Associations, signposting through GPs, hospitals and NHS and other community services - We will ensure that our services remain available in non-digital channels for our most vulnerable and hard to reach residents. - We will ensure offline channels are available for all services - We will provide training to help everyone access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations) - We will ensure that information is accessible to people with disabilities and special needs - We will deliver universal digital services that all users can use - Provision of digital inclusion digital inclusion work to ensure that Croydon residents of all ages are supported to learn basic digital literacy, and access online services - We will ensure provision is available on the front line to people with disabilities via Schools, libraries, localities/gateway hubs, community centres, support through voluntary/3 rd sector groups, resident groups, social workers, carer support groups, job centre plus, croydon works, CALAT.	Neil Williams	ongoing
		workers, carer support groups, job centre plus, croydon works, CALAT, Work & Health Programme, Housing Associations, signposting through		



		GPs, hospitals and NHS and other community services We will ensure that our services remain available in non-digital channels for our most vulnerable and hard to reach residents We will ensure offline channels are available for all services We will provide training to help everyone access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations)		
Gender	Our strategy explicitly makes the commitments to improve the net positive position relative to where we are now and therefore have a positive impact on them. We will take steps to mitigate negative impact by ensuring provision to all gender groups in the borough	 We will improve opportunities for females in tech education, skills and careers. We will raise the participation of female residents in tech education and careers in the borough We will deliver universal digital services that all users can use Provision of digital inclusion to ensure that Croydon residents of all ages are supported to learn basic digital literacy, and access online services We will ensure provision is available on the front line across gender groups via Schools, libraries, localities/gateway hubs, community centres, support through voluntary/3rd sector groups, resident groups, social workers, carer support groups, job centre plus, croydon works, CALAT, Work & Health Programme, Housing Associations, signposting through GPs, hospitals and NHS and other community services 	Neil Williams	ongoing



		-	We will ensure offline channels are available for all services We will provide training to help everyone access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations)		
Gender Reassignment	Our strategy explicitly makes the commitments to improve the net positive position relative to where we are now and therefore have a positive impact on them. We will take steps to mitigate negative impact by ensuring provision to all demographic groups in the borough	-	We will deliver universal digital services that all users can use Provision of digital inclusion to ensure that Croydon residents of all ages are supported to learn basic digital literacy, and access online services We will ensure provision is available on the front line via Schools, libraries, localities/gateway hubs, community centres, support through voluntary/3rd sector groups, resident groups, social workers, carer support groups, job centre plus, croydon works, CALAT, Work & Health Programme, Housing Associations, signposting through GPs, hospitals and NHS and other community services We will ensure offline channels are available for all services We will provide training to help everyone access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations)	Neil Williams	ongoing
Marriage or Civil Partnership	Our strategy explicitly makes the commitments to improve the net positive position relative to where we are now and therefore have a positive impact on them.	-	We will deliver universal digital services that all users can use Provision of digital inclusion to ensure that Croydon residents of all ages are supported to learn basic digital literacy, and access online services	Neil Williams	ongoing



Religion or belief	We will take steps to mitigate negative impact by ensuring provision to all demographic groups in the borough Our strategy explicitly makes the	-	residents despite their marital status via Schools, libraries, localities/gateway hubs, community centres, support through voluntary/3 rd sector groups, resident groups, social workers, carer support groups, job centre plus, croydon works, CALAT, Work & Health Programme, Housing Associations, signposting through GPs, hospitals and NHS and other community services We will ensure offline channels are available for all services We will provide training to help everyone access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations) We will deliver universal digital	Neil Williams	ongoing
	commitments to improve the net positive position relative to where we are now and therefore have a positive impact on them. We will take steps to mitigate negative impact by ensuring provision to all residents of all faiths and religious beliefs.	-	services that all users can use Provision of digital inclusion to ensure that Croydon residents of all ages are supported to learn basic digital literacy, and access online services We will ensure provision is available on the front line across people of all faiths and religious beliefs via Schools, libraries, localities/gateway hubs, community centres, support through voluntary/3 rd sector groups, resident groups, social workers, carer support groups, job centre plus, croydon works, CALAT, Work & Health Programme, Housing Associations, signposting through GPs, hospitals and NHS and other community services		



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		-	We will ensure offline channels are		
			available for all services		
		-	We will provide training to help		
			everyone access basic digital skills,		
			targeting this to where it is needed		
			most (be that location, age, race or		
			other demographic considerations)We		
			will ensure offline channels are		
			available for all services		
Race	Our strategy explicitly makes the	-	We will deliver universal digital	Neil Williams	ongoing
	commitments to improve the net positive		services that all users can use		
	position relative to where we are now	-	Provision of digital inclusion to ensure		
	and therefore have a positive impact on		that Croydon residents of all ages are		
	them.		supported to learn basic digital		
	We will take steps to mitigate negative		literacy, and access online services		
	impact by ensuring provision to	-	In addition to the translation services		
	residents of races and ethnic		offered by the council, and the google		
	backgrounds including BAME groups		translate option on the website, for		
			individual services, we will access		
			options based on individual user		
			needs of people for whom English is		
			not their first language		
		-	We will ensure provision is available		
			on the front line via Schools, libraries,		
			localities/gateway hubs, community		
			centres, support through voluntary/3rd		
			sector groups, resident groups, social		
			workers, carer support groups, job		
			centre plus, croydon works, CALAT,		
			Work & Health Programme, Housing		
			Associations, signposting through		
			GPs, hospitals and NHS and other		
			community services		
		-	We will ensure offline channels are		
			available for all services		
		_	We will provide training to help		
			everyone access basic digital skills,		
			targeting this to where it is needed		



			most (be that location, age, race or		
			other demographic considerations)		
Sexual Orientation	Our strategy explicitly makes the	-	We will deliver universal digital	Neil Williams	ongoing
	commitments to improve the net positive		services that all users can use		
	position relative to where we are now	-	Provision of digital inclusion to ensure		
	and therefore have a positive impact on		that Croydon residents of all ages are		
	them.		supported to learn basic digital		
	We will take steps to mitigate negative		literacy, and access online services		
	impact by ensuring provision to all	_	We will ensure provision is available		
	residents in the borough regardless of		on the front line across people across		
	sexual orientation		all sexual orientation groups via		
			Schools, libraries, localities/gateway		
			hubs, community centres, support		
			through voluntary/3 rd sector groups,		
			resident groups, social workers, carer		
			support groups, job centre plus,		
			croydon works, CALAT, Work &		
			Health Programme, Housing		
			Associations, signposting through		
			GPs, hospitals and NHS and other		
			community services		
		-	We will ensure offline channels are		
			available for all services		
		-	We will provide training to help		
			everyone access basic digital skills,		
			targeting this to where it is needed		
			most (be that location, age, race or		
			other demographic considerations)		
Pregnancy or Maternity	Our strategy explicitly makes the	-	We will deliver universal digital	Neil Williams	ongoing
	commitments to improve the net positive		services that all users can use		
	position relative to where we are now	-	Provision of digital inclusion to ensure		
	and therefore have a positive impact on		that Croydon residents of all ages are		
	them.		supported to learn basic digital		
	We will take steps to mitigate negative		literacy, and access online services		
	impact by ensuring provision to	-	We will ensure provision is available		
	residents with pregnancy and maternity		on the front line via Schools, libraries,		
	needs.		localities/gateway hubs, community		
			centres, support through voluntary/3rd		



	sector groups, resident groups, social workers, carer support groups, job centre plus, croydon works, CALAT, Work & Health Programme, Housing Associations, signposting through GPs, hospitals and NHS and other community services - We will ensure offline channels are available for all services - We will provide training to help everyone access basic digital skills, targeting this to where it is needed most (be that location, age, race or other demographic considerations)
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6. Decision on the proposed change

Based on the i	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 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	Х			
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 lir reached this decision.	e with the duty to have due regard and how you		
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	on be considered at a scheduled meeting? e.g. Contracts and	Meeting title: Cabinet		
Commissioning Board (CCB) / Cabinet		Date: 8 th July 2019		

7. Sign-Off

Officers that must approve this decision				
Equalities Lead	Name:	Yvonne Okiyo	Date: 13.6.19	
	Position:	Equalities Manager		
Director	Name:		Date:	
	Position:			