

Equality Analysis Form

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 Department
Title of proposed change	Investigation of disrepair at 1-87 Regina Road, South Norwood, and Council Housing Improvement Plan
Name of Officer carrying out Equality Analysis	John Montes, Senior Corporate Strategy Officer

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

The council commissioned ARK Consultancy (ARK) to conduct an urgent independent investigation to understand the circumstances that led to residents of three Croydon Council owned flats at 1-87 Regina Road, South Norwood living in the conditions that presented a risk to health and safety and significantly impacted the quality of life of four tenants. In ARK's view, the issues identified by the investigation as contributing to the problems at Regina Road represent 'a failure to deliver even basic 'core' housing services effectively. They are potentially symptomatic of poor performance across the council's housing service and impact on its ability to drive self-improvement'.

ARK make a series of recommendations for improvement. In response, the cabinet report proposes an interim action plan to effect wide-ranging improvements to the housing service and provide tenants and leaseholders with value for money. It covers improvements in

- governance and strategic leadership of the housing service, including the creation of the post of Interim Executive Director of housing to bring together the council's housing functions and improvement work, and lead the development of a longer-term Housing Service Improvement Plan;
- workforce planning and skills development of staff;
- cultural and behavioural change both of council staff and contractor operatives to ensure a 'safety first', caring and empathetic approach to tenants;
- enhanced tenant involvement structures to fully involve the council's tenants and leaseholders both in terms of responding to issues raised and in the co-design and co-delivery of services;
- accurate and timely business intelligence to inform the planning of investment in council homes and address the underlying causes of repair issues in council homes;
- effective performance management; and
- more accessible and better complaints handling.

The action plan includes a wider ranging review of the housing service, to include the quality and cost of emergency and temporary accommodation for homeless households and the impact of such accommodation on families with children. An examination of historic allocations of housing is also proposed.

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>Although the flats at 1-87 Regina Road have one bedroom, eight homes are currently occupied temporary accommodation, and others may have been allocated in the past as temporary accommodation. ARK reported some families with children living there in overcrowded conditions.</p> <p>The action plan includes a review of historic allocations as well as assessment of housing need for those who need to move to larger accommodation. The quality and cost of emergency and temporary accommodation provided for homeless households and the impact on children will also be reviewed.</p>	N/A	8 out of 44 flats are currently occupied as temporary accommodation according to council housing occupancy data.

	The changes in this plan will improve the quality of housing for these tenants, and ensure that the housing service is visible, open and accessible to them and offers a caring, empathetic and effective response to their needs. Residents will have greater opportunity for involvement in responding to issues raised, in further development of the plan, in co-design and co-delivery of services and in the scrutiny of the outcomes.		
Disability	N/A	N/A	N/A
Gender	N/A	N/A	N/A
Gender Reassignment	N/A	N/A	N/A
Marriage or Civil Partnership	N/A	N/A	N/A
Religion or belief	N/A	N/A	N/A
Race	<p>The percentage of tenants of flats in Regina Road who are from BAME communities is disproportionately high, compared to the percentage of Croydon Council tenants generally and the population in the borough. There will be a review of housing allocations.</p> <p>The changes in the action plan will improve the quality of housing for these tenants, and ensure that the housing service is visible, open and accessible to them and offers a caring, empathetic and effective response to their needs. Residents will have greater opportunity for involvement in responding to issues raised, in further development of the plan, in co-design and co-delivery of services and in the scrutiny of the outcomes. In particular, as there is currently no tenancy or residents association that covers Regina Road, the council is seeking to work with</p>	N/A	<p>Analysis of ethnicity of existing tenants compared with the ethnic profile of the London Borough of Croydon: 53% of Croydon population are from BAME backgrounds (<i>GLA, 2016-based Round of Demographic Projections Local authority population projections - Housing-led ethnic group projections, November 2017.</i>)</p> <p>40.75% of Croydon council tenants are from BAME backgrounds, and 69.05% of tenants at 1-87 Regina Road are from BAME backgrounds.</p> <p>This may be explained by the fact that 8 (18%) of flats are currently let as temporary accommodation, given that 64.6% of main homeless applicants owed a prevention or relief duty by the council in 2019/20 declared their ethnic origin to be BAME</p> <p>https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness</p>

	Regina Road residents to set up a residents group. We will ensure the residents group is representative of the tenants that occupy the flats		
Sexual Orientation	N/A	N/A	N/A
Pregnancy or Maternity	<p>Although the flats at 1-87 Regina Road have one bedroom, eight homes are currently occupied temporary accommodation, and others may have been allocated in the past as temporary accommodation; they may therefore include households with pregnant women and young children.</p> <p>The action plan includes a review of historic allocations as well as assessment of housing need for those who need to move to larger accommodation. The quality and cost of emergency and temporary accommodation provided for homeless households and the impact on children will also be reviewed.</p> <p>The changes in this plan will improve the quality of housing for these tenants, and ensure that the housing service is visible, open and accessible to them and offers a caring, empathetic and effective response to their needs. Residents will have greater opportunity for involvement in responding to issues raised, in further development of the plan, in co-design and co-delivery of services and in the scrutiny of the outcomes.</p>	N/A	8 out of 44 flats are currently occupied as temporary accommodation according to council housing occupancy data.

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
<p>Consultation with the public and stakeholders</p> <p>As part of its investigation, ARK interviewed council staff, councillors and tenants from 1-87 Regina Road. The Leader of the Council and Cabinet Member for Homes both spoke to residents, including those who have been most affected, to offer apologies, answer questions and hear feedback. In addition, the Leader of the Council, Cabinet Member for Homes and the Chief Executive of the council visited the block and spoke to residents. At the request of residents a private meeting was held with residents of the three blocks at Regina Road with the Leader, Cabinet Member and Ward Councillors.</p> <p>A wider review of the housing service will consider in particular how the council fully involves its tenants and leaseholders, both in terms of responding to issues raised and in the co-design and co-delivery of services. Tenants and leaseholders will be included in the membership of the Housing Improvement Board that will oversee the review as well as the development and implementation of the more detailed Housing Improvement Plan. Tenants directly affected by the Regina Road situation have been invited to take part.</p> <p>The existing structures for resident participation and scrutiny, the Tenants and Leaseholders Panel, the housing scrutiny panel, housing services inspectors and mystery shoppers, all have a role for testing and holding the housing service to account. There is currently no tenancy or residents association that covers Regina Road. The council is seeking to work with Regina Road residents to set up a residents group. The council will seek the views of council tenants and leaseholders in Croydon as well as of other experts in the borough and beyond, on how the participation of tenants and leaseholders can be widened as well as deepened.</p>	<p>Consultation</p>	<p>TBC – Oct/Nov</p>

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

<p>Column 1</p> <p>PROTECTED GROUP</p>	<p>Column 2</p> <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>Column 3</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>Column 4</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	N/A	N/A	N/A
Gender	N/A	N/A	N/A
Gender reassignment	N/A	N/A	N/A
Marriage / Civil Partnership	N/A	N/A	N/A
Race	3	3	9
Religion or belief	N/A	N/A	N/A
Sexual Orientation	N/A	N/A	N/A
Pregnancy or Maternity	2	2	4

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	N/A	N/A	N/A	N/A
Race	N/A	N/A	N/A	N/A
Sex (gender)	N/A	N/A	N/A	N/A
Gender reassignment	N/A	N/A	N/A	N/A
Sexual orientation	N/A	N/A	N/A	N/A
Age	N/A	N/A	N/A	N/A

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Religion or belief	N/A	N/A	N/A	N/A
Pregnancy or maternity	N/A	N/A	N/A	N/A
Marriage/civil partnership	N/A	N/A	N/A	N/A

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	<p>Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</p> <p>The proposed recruitment of an interim executive director for housing, the interim action plan proposed, will achieve an improvement in the quality and responsiveness of the housing service and improve housing conditions in council homes for all tenants, including those with protected characteristics. The planned wider ranging review of the housing service and the review of historic allocations will lay the basis for a longer term Housing Service Improvement Plan for further improvements to the service.</p>	X
Adjust the proposed change	<p>We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</p>	
Continue the proposed change	<p>We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. 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.</p>	
Stop or amend the	<p>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.</p>	

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proposed change		
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: N/A Date:

7. Sign-Off

Officers that must approve this decision		
Equalities Lead	Name: Yvonne Okiyo Position: Equalities Manager	Date: 06.05.21
Director	Name: Sarah Hayward Position: Interim Executive Director, Place	Date: 07/05/21