

## Equality Analysis

### 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

|   |                                 |
|---|---------------------------------|
| <b>Directorate</b>                                    | <b>All</b>                      |
| <b>Title of proposed change</b>                       | <b>Fees and Charges 2021/22</b> |
| <b>Name of Officer carrying out Equality Analysis</b> | <b>Ian O'Donnell</b>            |

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

The council provides a wide range of services to residents and businesses. For some of these the council is entitled to make a charge. For others it is not permitted to do so. Reasons for making a charge include:

- There is a statutory charge – for example, planning fees and licensing fees.
- It is the council's policy to recover its costs in relation to the discretionary or incidental provision of goods or services provided so that they are not funded by the council tax payer – for example, collecting bulk waste from residential premises.
- It may be the council's policy to partially subsidise a service to encourage take-up (e.g. sports) or to support a policy objective (e.g. bulky waste collections to reduce fly tipping).
- There is an existing market that would be distorted if the council did not charge the market rate – for example, trade refuse collection – although charges are still subject to the cost recovery basis set out in statute.

Like other businesses, the council's costs are affected by demand and supply factors such as inflation. It is good practice for the council to review its charging policies and the level of charges annually to ensure that they stay relevant and reflect the council's underlying costs.

The charging policy for adult social care is the subject of a separate report and equality analysis and is out of scope for this report. Parking charges are also subject to separate analysis and decision-making, and out of scope for this report.

The fees and charges in Appendix 1 represent approximately one third of the total range of fees and charges the council makes. Further reports will be brought forward to Cabinet or through the relevant decision-making committees to deal with the remainder.

The key point in relation to the increases in fees and charges set out in this report is that the increases relate to inflation and are therefore neutral in terms of their effects upon protected groups.

### 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                               | The council offers concessionary charges to young people for some activities (e.g. football juniors) and old people (e.g. Fishing 60+) to encourage participation in line with the council's public health and leisure policies. A percentage increase in charges maintains the differential. | Increases in charges in line with inflation are assumed to have a neutral impact, as resident income is expected to increase similarly. Where charges increase above the underlying wage inflation this may have a negative impact where the protected characteristic is associated with low income levels (e.g.pensioners). However, there are no instances of this except for where prices | <b>Appendix 1</b>  |

|                               |   |  |                   |
|-------------------------------|---|--|-------------------|
|                               |   | are increased to 'catch up' when they have not previously been increased since 2018.   |                   |
| Disability                    | The council offers concessionary charges for some activities connected with disabled people (e.g. planning charges are waived for works to improve disabled people's access to a building) in line with its policies concerning supporting disabled people. | Increases in charges in line with inflation are assumed to have a neutral impact, as resident income is expected to increase similarly. Where charges increase above the underlying wage inflation this may have a negative impact where the protected characteristic is associated with low income levels. However, there are no instances of this except for where prices are increased to 'catch up' when they have not previously been increased since 2018. | <b>Appendix 1</b> |
| Gender                        | Not relevant  |  |                   |
| Gender Reassignment           | Not relevant  |  |                   |
| Marriage or Civil Partnership | Not relevant  |  |                   |
| Religion or belief            | Not relevant  |  |                   |
| Race                          | Not relevant  |  |                   |
| Sexual Orientation            | Not relevant  |  |                   |
| Pregnancy or Maternity        | Not relevant  |  |                   |

**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 |
|--|--------------------|---------------------|
| None   |                    |                     |

|  |  |  |
|--|--|--|
|  |  |  |
|--|--|--|

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**

|                           |                             |   |   |   |
|---------------------------|-----------------------------|---|---|---|
| <b>Severity of Impact</b> | 3                           | 3 | 6 | 9 |
|                           | 2                           | 2 | 4 | 6 |
|                           | 1                           | 1 | 2 | 3 |
|                           |                             | 1 | 2 | 3 |
|                           | <b>Likelihood of Impact</b> |   |   |   |

**Key**

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

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**Table 3 – Impact scores**

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

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|                        |   |   |   |
|------------------------|---|---|---|
| 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   | N/A             |                      |              |                     |
| Race   | N/A             |                      |              |                     |
| Sex (gender)   | N/A             |                      |              |                     |
| Gender reassignment  | N/A             |                      |              |                     |
| Sexual orientation   | N/A             |                      |              |                     |
| Age  | N/A             |                      |              |                     |
| Religion or belief   | N/A             |                      |              |                     |
| Pregnancy or maternity   | N/A             |                      |              |                     |
| Marriage/civil partnership   |                 |                      |              |                     |

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### 6. Decision on the 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>   | X                           |
| Adjust the proposed change   | We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. <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>  |                             |
| 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? e.g. Contracts and Commissioning Board (CCB) / Cabinet  |   | Meeting title:<br>Date:     |

## Equality Analysis

### 7. Sign-Off

| Officers that must approve this decision |  |                       |
|--|--|-----------------------|
| Equalities Lead                          | <b>Name:</b> Yvonne Okiyo<br><b>Position:</b> Equalities Manager                           | <b>Date:</b> 07.05.21 |
| Director                                 | <b>Name:</b> Chris Buss<br><b>Position:</b> Interim Director of Finance, Investment & Risk | <b>Date:</b> 7.5.21   |