

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	Place
Title of proposed change	Update to Croydon Private Sector Housing Assistance Policy 2021
Name of Officer carrying out Equality Analysis	Lesley Roman

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.

The Housing Renewal Team undertakes its work under the terms of the 'Private Sector Housing Assistance Policy'. The policy was last updated in 2014. We have recently reviewed and updated it to reflect the current housing needs of Croydon's residents, which we feel will have a positive impact on all protected characteristic groups.

The services, grants and loans that we provide are aimed to enable older, vulnerable, disabled residents, as well as people on low incomes to remain living independently and safely in their own homes. Our services mainly cover those living in private sector housing, private and housing association tenants, but services such as our Gardening and Handyperson services are available to all Tenures.

Our Policy has been in operation for over 20 years, and is regularly reviewed to ensure we meet local needs. The three main areas covered under the policy with significant changes are as follows:

Home Investment Loans – available to owner occupiers, these are means tested, and are repayable if and when the property is sold. No interest is payable on these loans. They can provide roof repair/replacement, electrical rewire, replacement windows, replacement boilers and energy efficiency measures.

Disabled Facilities Grants – these are mandatory grants and are funded by central government. They are available to all tenures (except council tenants, who have access to the Housing Revenue Account for adaptations). These are means tested. They provide wet rooms, stairlifts, hoists, ramps.

Empty Property Grants – these grants are given to bring empty homes back into use. They properties are generally given back to the council for a minimum 5 year period, to ease the pressure on the Council's waiting list, for council property.

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 new policy will provide more scope for people to access financial support to improve, adapt and maintain their homes, in order to remain living in a safe and secure environment. Improved living conditions result in better health and wellbeing.</p> <p>Proposed Changes*</p> <p>Home Improvement Loans</p> <p>Increase loan from £20k to £30k.(A proposed increase to £30k would be more in line with the current cost of building work to satisfactorily cover a range of essential repairs. Roof, Window, Electrics, DPC, renew bathroom, renew kitchen etc. especially over the life of the policy -5 years).</p> <p>Means test -Increase savings levels to account for an individual (max £15k) or a couple (£20k)</p> <p>Include a client contribution within the Loan, and add as a lifetime charge.</p> <p>Allow previous Loan applicants to access the new Loan limit for unrelated work up to £30k</p>		<p>Feedback from applicants for loans/grants – analyzing the number of people who do not proceed because of certain aspects of the loan/grant – the improvements proposed will negate some of these issues. These are outlined in the positive impact column *</p> <p>The most common reason for people not proceeding with grant and loans is generally financial – in that they are not eligible as their income is too high. Or they do not want the upheaval that the work involves</p> <p>We are currently unable to provide detailed reports on the makeup of client groups i.e. BAME, Gender, Ethnicity etc. But will look to address this with improved IT, to be able to report on the information that we record.</p>

	<p>Home Repair Loans</p> <p>Increase savings level to £6k</p> <p>Increase HR Loan limit to £4k</p> <p>Include annual services costs of equipment i.e. stair lifts/ hoists under the HR loan</p> <p>Empty Homes Grant</p> <p>To add an additional element of financial assistance of £5000 to Empty Homes Grant (13.0) in cases where it is possible to increase the provision of adapted ground floor units. This reflects the higher cost of providing adapted units to meet the needs of residents with disabilities who are waiting for a suitably adapted home. The council will retain nomination rights for 5 years to all adapted and non-adapted units. This will enable the council to house residents with disabilities. There are currently over 100 residents awaiting wheelchair accessible accommodation on the housing waiting list.</p>		
Disability	<p>Proposed Changes*</p> <p>Increase relocation grant from £7k - £10k (enable people to move to a more suitable property to be adapted)</p> <p>Offer a Discretionary Disabled Facility Grant to top up DFG grant (max £30k) (when work exceeds £30k limit)</p> <p>Include reasonable client contributions on Discretionary DFG- (this helps people who have been assessed to pay a contribution</p>		

	towards the work, but who are unable to afford it).		
Gender	The above applies (see column on age)		
Gender Reassignment	The above applies (see column on age)		
Marriage or Civil Partnership	The above applies (see column on age)		
Religion or belief	The above applies (see column on age)		
Race	The above applies (see column on age)		
Sexual Orientation	The above applies (see column on age)		
Pregnancy or Maternity	The above applies(see column on age)		

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

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	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
Sexual Orientation	1	1	1
Pregnancy or Maternity	1	1	1

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				
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				
Age				
Religion or belief				
Pregnancy or maternity				

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Marriage/civil partnership				
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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.			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. 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: Date:		

7. Sign-Off

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Officers that must approve this decision	
Equalities Lead	Name: Yvonne Okiyo Date: 01.12.20 Position:
Director	Name: Date: Position: