

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	Sustainable Communities, Regeneration & Economic Recovery
Title of proposed change	Local Implementation Plan (LIP) Delivery Plan 2022/23-2024/25
Name of Officer carrying out Equality Analysis	Denise McCausland

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.

Each London local authority is required to produce a 'LIP', setting out how it intends to implement the Mayor of London's Transport Strategy within its area. The Croydon LIP was approved in 2019, and included a detailed three year Delivery Plan, which must be refreshed every three years during the lifetime of the LIP, with the next update due to cover 2022/23-2024/25. The new Delivery Plan should align with the original LIP objectives, but also reflect new priorities set by TfL. TfL has provided a 'Strategic Data Set' to inform the making of the programme, which will be an important part of the TfL assessment and allocation of funding.

TfL sees the Healthy Streets approach continuing to be a key way of addressing the challenges London faces. Delivering Vision Zero (no one killed or seriously injured) by 2041 also remains a central priority. The focus areas are summarised below:

- Enabling all Londoners to feel that active travel is a safe and accessible option through a range of Vision Zero and other interventions that delivery safer streets for cycling and walking;
- Enhancing and expanding London's bus priority network to enable faster and more reliable buses, making them a compelling offer for Londoners;
- Supporting infrastructure measures to the above (such as cycling parking, school streets, improved interchange etc.

Behaviour change initiatives will also be funded where they support the above focus areas.

A new Delivery Plan has been drafted covering the period 2022/23-2024/25, which shows a three year proposed programme, and is the subject of this EQIA. (It should be noted that an EQIA was undertaken for the full LIP document produced in 2019). The new programme contains a range of proposed schemes across the borough, including Healthy Neighbourhoods, Healthy Streets, pedestrian/cycling improvements, school streets, safety schemes, cycle parking, bus priority, car clubs, electric vehicle charging points, mobility hubs and behavioural change/road safety education.

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>With the exception of driving and travelling by bus, older Londoners use all forms of transport less frequently than the total London population. However, as people get older their car use/access declines. Around three-quarters of Londoners aged between 65 and 69 hold a full driving licence (72% compared with 65% of all Londoners. This drops considerably for the older age groups (63% for 70 to 79-year-olds and 37% for 80+).</p> <p>All schemes within the LIP Delivery Plan, to differing extents, will encourage modal shift to walking/cycling/public transport or encourage the transition to cleaner vehicles, which in turn will have a positive impact on air quality. Those most at risk from poor air quality will benefit most ie children, older people, pregnant women. Schemes such as Healthy Schools and Play Street measures will also most benefit school children and their carers. Schemes that reduce road danger and provide safer spaces for cycling will benefit those most vulnerable to road danger, including children and older people. Schemes that encourage more walking/cycling/public transport use, should result in higher levels of natural surveillance on the street, benefitting those more vulnerable to street crime.</p>	<p>None specific. Disadvantage may be Disability related. The proportion of Londoners who are disabled increases with age. 5% of 16 to 24-year-olds are disabled compared with 44% of Londoners aged 65 or over. See 'Disability' below.</p>	<p>Mayor of London's Transport Strategy; Mayor's Air Quality Strategy; Travel in London: Understanding our diverse communities 2019. Policy Studies Institutes study 'Children's Independent Mobility: A Comparative Study in England and Germany 1970 – 2010' Independent Mobility and Child Development, Nuffield Foundation 'Making Cycling Irresistible: Lessons from The Netherlands, Denmark and Germany', JOHN PUCHER and RALPH BUEHLER (2008) 'Young People's Travel – What's Changed and Why? Review and Analysis' (2018)</p>

Children are the group whose independent mobility has been curtailed the most as streets have been taken over by more and more cars. Providing quieter and safer streets provides space in which children can more easily regain their independent mobility, play and socialise. The same quieter streetspace can help them get a little closer to the levels of cycling seen amongst their north European counterparts.

The proposed programme is intended to create a network of quieter and safer streets to foster walking and cycling. Children and young people are amongst those likely to be benefiting the most. Many will be living in the households which do not have access to a car or a van. Nationally, young adults are significantly less likely to hold a driving licence and driving less than they did in the past. Aiding walking and cycling including to public transport will benefit this group.

Quieter streets may well be a factor in enabling older people to keep cycling or to choose cycling and could help the percentage of cycle trips made by older people get a little closer to some of those in northern Europe, something made feasible in hilly areas by modern E-bikes (although at a financial cost as with the private motor car).

The degree to which children's access to active travel and to play in the street puts them at risk of being overweight and associated medical conditions, both in childhood and later in life. Behaviours (including travel behaviour) learnt in childhood are often taken into later into life. Facilitating active travel in early life is part of

	<p>ensuring good health as an adult and older adult.</p> <p>The Mayor's Healthy Streets objective is a key part of his approach to tackling climate change. Those that are young today, are the ones that will be experiencing the worst effects of climate change when older adults.</p> <p>Young adults (age 17 to 29) in Great Britain and other countries are driving less now than young adults did in the early 1990s.</p>		
Disability	<p>84% of disabled Londoners report that their disability limits their ability to travel. For each type of transport (with the exception of private hire vehicles) a lower proportion of disabled Londoners use each type of transport at least once a week compared with non-disabled Londoners. The most commonly used types of transport by disabled Londoners are walking (81% of disabled Londoners walk at least once a week), the bus (58%), car as the passenger (42%) and car as the driver (24%). The latter compares to 39% of non-disabled adults, driving at least once a week. Cycling levels are similar between disabled and non disabled people.</p> <p>Schemes designed to facilitate walking and cycling or reduce road danger eg traffic reduction through Healthy Neighbourhoods, or segregated cycle lanes that are wide enough to accommodate adapted bikes, will benefit disabled users wishing to walk or cycle more.</p> <p>Bus priority and bus stop accessibility improvements will also benefit disabled people wishing to use the bus.</p>	<p>The measures in the programme are intended to help all to choose to travel actively. However care in design and implementation is needed including engaging with people with disabilities to help ensure that that the programme does address the many barriers that disabled people face to Active Travel and to encourage take up of walking, wheeling and cycling, and to create an accessible public transport system as a viable alternative to car-use. The Healthy Neighbourhood programme is one part of the proposed Delivery Plan. However additional action is likely to be required (work informed by access audits) to minimize barriers to movement for disabled people within and through these areas. The Healthy Neighbourhood programme is the subject of a separate / parallel equality analysis which has shaped the design / operation of the recommended Experimental Healthy Neighbourhoods and which would should inform decisions on the future of any Experimental HNs.</p>	<p>Travel in London: Understanding our diverse communities 2019; TfL Cycling Action Plan. Pave The Way, Transport for All, January 2021</p>

		The Delivery Plan includes the conversion of Hail and Ride bus routes to services with fixed stops so that the stops can provide access for people using wheelchairs.	
Gender	Less women than men currently cycle. Research has shown that one of the biggest barriers to more women taking up cycling is road danger. Schemes that reduce road danger and provide safer spaces for cycling will benefit women. Schemes that encourage more walking/cycling/public transport use, should result in higher levels of natural surveillance on the street, benefitting those more vulnerable to street crime.		Mayor of London's Transport Strategy; TfL Cycling Action Plan; TfL Travel in London Reports; Travel in London: Understanding our diverse communities 2019.
Gender Reassignment	People with this protected characteristic may be more vulnerable to hate crime. Schemes that encourage more walking/cycling/public transport use, should result in higher levels of natural surveillance on the street, benefitting those more vulnerable to street crime.		Travel in London: Understanding our diverse communities 2019.
Marriage or Civil Partnership	Not impacted any more/less than those without protected characteristics.	Not impacted any more/less than those without protected characteristics.	
Religion or belief	Not impacted any more/less than those without protected characteristics, except where there may be correlations between religion and certain races (see below characteristic commentary). More than half of black (68%) and white (57%) Londoners report that they are Christian. Asian Londoners and Londoners who have selected 'other' to describe their ethnic group are most likely to be Muslims (36% of Asian Londoners and 50% of Londoners selecting 'other' ethnic group are Muslims)	Not impacted any more/less than those without protected characteristics, except where there may be correlations between religion and certain races (see below).	Travel in London: Understanding our diverse communities 2019.
Race	Those from BAME groups are more likely to walk or use the bus and will benefit the most from walking and bus priority/accessibility schemes. BAME Londoners are more at risk of being killed or seriously injured and will therefore benefit from schemes that reduce road danger. BAME Londoners are less likely		TfL Cycling Action Plan, TfL Travel in London Reports, Travel in London: Understanding our diverse communities 2019.

	to hold a driving licence compared to white Londoners, so will benefit more from sustainable travel schemes. (It should be noted that cycling levels amongst BAME and white Londoners is similar.		
Sexual Orientation	LGBT people may be more vulnerable to hate crime. Schemes that encourage more walking/cycling/public transport use, should result in higher levels of natural surveillance on the street, benefitting those more vulnerable to street crime.		Travel in London: Understanding our diverse communities 2019.
Pregnancy or Maternity	All schemes within the LIP Delivery Plan, to differing extents, will encourage modal shift to walking/cycling/public transport, which in turn will have a positive impact on air quality. Those most at risk from poor air quality will benefit most ie children and pregnant women. Schemes such as Healthy Schools measures will also most benefit school children and their carers. Schemes that reduce road danger and provide safer spaces for cycling will benefit those most vulnerable to road danger, including children. Bus stop accessibility improvements will also benefit people wishing to use the bus with a pram/pushchair.		Travel in London: Understanding our diverse communities 2019.

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			

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			
Disability			
Gender			
Gender reassignment			
Marriage / Civil Partnership			
Race			
Religion or belief			
Sexual Orientation			
Pregnancy or Maternity			

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Table 3 - Impact Scores									
Work area	Age	Disability	Gender	Gender Reassignment	Sexual orientation	Marriage / Civil Partnership	Pregnancy / Maternity	Race	Religion / belief
Healthy Neighbourhoods	4	4	1	1	1	1	1	1	1
Healthy Streets/ improved cycle routes	2	2	1	1	1	1	1	1	1
Play Streets	1	1	1	1	1	1	1	1	1
Healthy Schools (School streets, cycle routes, behaviour change)	1	1	1	1	1	1	1	1	1
IVision Zero schemes & behaviour change	1	1	1	1	1	1	1	1	1
Cycle parking / hire	2	2	1	1	1	1	1	1	1
Mobility hubs	2	2	1	1	1	1	1	1	1
Electric Vehicle Charging Points	2	2	1	1	1	1	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	The Equality Analysis related to the Experimental HN programme identified a number of potential negative effects for people with disabilities including on those with an essential need to use a car and needing access within the HN which	Exemption permits for Blue Badge holders for the 'No Motor Vehicles' restrictions implementing an experimental LTN. Also for district nurses and other careers. Exemptions for dial-a-ride, community transport and SEN transport buses, plus taxis (hence taxicard users).	Highways and parking Service	Already completed

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	the Equality Analysis then proposed mitigation.	When reallocating kerbside space, continued careful consideration of impact on other road users. Helping those that can to walk, wheel and cycle is intended to free up road space to help those who have an essential need to use a car, and to improve journey time and reliability for bus users, dial-a-ride users etc.		
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	None specific, potentially related to age related Disability. See 'Disability' section above.	See 'Disability' above	Highways and Parking Service.	Already completed
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	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

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	Any potential negative impacts are minimal and have mitigation actions that are already being progressed, as set out in section 5 of this form.	
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

Officers that must approve this decision	
Equalities Lead	<p>Name: Denise McCausland Date: 17/11/21</p> <p>Position: Equalities Manager</p>

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Director	Name: Heather Cheesbrough	Date: 18/11/21
Position: Director of Planning and Sustainable Regeneration		