

# Equality Analysis: Fees & Charges

## 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	All
Title of proposed change	Fees & Charges 2022/23
Name of Officers carrying out Equality Analysis	Laura McCartney

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

Croydon Council supports delivery of a wide range of services. The ability to charge where appropriate, is a key funding source to support the cost of providing the service. There are specific powers to charge and the Council's charging policy is set out under paragraph four of the main report.

- Parking and property rental fees and charges are excluded from this report.
- Licensing and regulatory related fees are non-executive functions and are reserved for consideration by non-executive committees of the Council.
- There are also Officer delegations in place from the relevant regulatory committees in relation to certain highway charges (skip and scaffolding licences etc). These are not included in the report.

#### Context for Change

Residents and customers currently pay specific fees and charges for a wide range of activities and services such as building control services, planning application, land charges fees, leisure activities, care related charges etc. Some of these fees and charges are set nationally and the council is legally required to adopt these levels, whilst other fees and charges are set at levels using the council's discretion.

With the cost of providing charged -for goods and services going up due to inflation and other factors, the Council need to increase its charges by an equivalent amount to ensure that it continues to recover its costs.

The Council has a need to balance its budget which an increase in fees would support. The proposed change in fees and charges contributes to the delivery of savings of £1.2m as approved by Full Council in March 2022. The Council is also mindful of the impact of an increase on the residents that it delivers its services to may have.

Our current equality analysis is focused on the public sector equality duty:

- Advancing equality of opportunity between people who belong to protected groups.
- Eliminating unlawful discrimination, victimisation and harassment.
- Fostering good relations between people who belong to protected groups.

The increase in fees and charges should also be considered in the current wider economic context, with inflation at historically high levels. The cumulative effect from other increases that is likely to impact on residents, where often low-income households face by having to use methods for bills such as a payment metre, instead of direct debit, which has an accompanying higher cost. This impact will be across residents and may include some with protected characteristics. However, the proposed change in fees and charges is, in almost every case, below the inflation rate of 10.1% in July 2022 (which is forecast to increase further) – often significantly below the inflation level.

There are mitigations in place which the Council currently provide to support those in need and these are detailed in section 5 of this Equality Impact Assessment.

### 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**

	<p>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.</p> <p><b>PLEASE NOTE:</b> As this report covers a wide range of Council services (see Appendix 1), the equalities impact caused by a change in charges will differ in line with the service in question, and the demographics of those individuals &amp;/or communities who use or benefit from the service.</p> <p>This EQIA addresses the general impact of a review of fees and charges at Directorate Level, along with any planned mitigations to the impact on groups and individuals that share protected characteristics and utilises data currently available.</p> <p>The fees and charges subject to increase will impact on all residents that use those services, some fees and charges will have more of an impact on some characteristics than others and are detailed below. Mitigating actions are in place for all of these and detailed in later in the EQIA.</p>
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Protected characteristic group(s)	Negative Impact	Positive impact	Source of evidence
Age	<p>The change in fees is <b>unlikely to have any impact on this protected characteristic group</b> that is greater than any other resident.</p> <p>The fees in relation to cremation/burial may affect older residents more. However, the <b>impact is considered to be low</b> as the fee increase is below overall inflation levels.</p> <p>Fees in relation to adult social care could impact this protected group more, but financial assessments are in place for these services.</p>		<p>ONS 2020</p> <p>The borough data regarding age is as follows:</p> <ul style="list-style-type: none"> <li>• 97,900 0-19 year olds. This is the highest in London. (2021 Census)</li> <li>• 239,700 20-64 year olds. This is the highest in London. (2021 Census)</li> <li>• 53,100 65+ year olds. This is the 3<sup>rd</sup> highest in London. (2021 Census)</li> </ul>
Disability	<p>The change in fees is <b>unlikely to have any impact on this protected characteristic group</b> that is greater than any other resident.</p> <p>However, external factors mean some disabled resident face higher costs in areas such as energy use. The mitigating factors shown later in the EQIA will therefore be essential to supporting this group of residents.</p>		<p>Census 2011</p> <p>Census 2011 tells us that 6.7% of Croydon residents have their day-to day activities limited a lot</p> <p>Employment rates for disabled people, across all ages, are significantly lower than those of non-disabled people. Those being hit the hardest and most likely to say they are financially struggling are Asian and Black Londoners, those with an income of less than £20,000, renters and <b>Deaf and Disabled Londoners.</b></p> <p><a href="http://www.gov.uk">The employment of disabled people 2021 - GOV.UK (www.gov.uk)</a></p>
Sex	<p>The change in fees is <b>unlikely to have any impact on this protected characteristic group</b> that is greater than any other resident.</p> <p>The fees in relation sports may affect one sex more than another if usage varies by sex.</p>		<p>ONS 2021</p> <p>ONS data asks for sex 2021 census asks about gender results unavailable at this stage</p> <p>203,000 (51.9%) residents in Croydon are female and 187,800 are male (48.1%)</p>

	<p>Examples of participation of both sexes in traditionally single sex sports are numerous and vice versa.</p> <p>However, sports are open to all residents and the fee increases are not considered to have a bearing on participation levels by sex.</p>	
<p>Gender reassignment/ identity</p>	<p>The change in fees is <b>unlikely to have any impact on this protected characteristic group</b> that is greater than any other resident.</p> <p>The fees in relation sports may affect one gender more than another if usage varies by gender identify.</p> <p>However, sports are open to all residents and the fee increases are not considered to have a bearing on participation levels by gender identify.</p>	<p>N/A Data unavailable until end 2022</p>
<p>Marriage or Civil Partnership</p>	<p>The changes in registrars fees may negatively impact residents based on their intention of entering into marriage or civil partnership.</p> <p>However, the cost of an average wedding is approximately £17,000, therefore the <b>impact of a change in registrars fees is considered to be minimal</b> in comparison to these other potential costs associated with getting married/having a Civil Partnership.</p> <p>The Council offers different buried plots which could be purchased more by people in this protected characteristic group (e.g. double plot may be more popular with those residents that are married or in a civil partnership. However, the fee increase is consistent and therefore <b>there is no impact considered for this protected characteristic.</b></p>	<p>Census 2011</p> <p>The borough data on marital status is as follows: 43% married, 39% single, 11% divorced or separated.</p> <p>In 2011, 796 people in Croydon were in a registered same-sex civil partnership. This was 0.3% of the 16+ population.</p>

<p>Religion or belief</p>	<p>The changes in bereavement fees may impact residents based on their religion or belief</p> <p>The Hindu faith, for example, believes in cremation as opposed to burial. Therefore, changes in cremation fees may impact them more.</p> <p>Christian ceremonies often incorporate the singing of hymns, and therefore the change in organist fee could be seen to impact them more than other faiths.</p> <p>However, the fee increases are below inflation and the percentage change between burial and cremation is consistent.</p> <p>Therefore, <b>no impact is anticipated for this protected characteristic group.</b></p> <p>In relation to registrars fees, marriage rates may vary by religious groups and therefore it could be suggested that the change in fee would impact this group more. However, and as set out above, the registrars fee is a small proportion of the cost of the average wedding and therefore the <b>change is considered to have minimal impact.</b></p>		<p>Census 2011</p> <p>Census 2011 data tells us that 56.4% of Croydon residents are Christian, 8.1% Muslim, 6% Hindu, 20% have no religion, and 7.6% did not state a religion.</p> <p>The census results in 2011, identified 21,739 Hindu residents in Croydon of all ages. This is 6% of the borough population.</p>
<p>Race</p>	<p>The change in fees is <b>unlikely to have any impact on this protected characteristic group</b> that is significantly greater than any other resident.</p>	<p>Community events can support the delivery of the public sector equality duty by fostering or encouraging good relations between people who share a</p>	<p>GLA 2015, and gov.uk current data</p> <p>GLA 2105 data states that 54% of Croydon residents describe themselves as ethnic minority/mixed.</p> <p>It should be noted that this data provides an indication of ethnicity and does not give an indication of citizenship.</p>

	<p>The citizenship ceremony fee may impact residents of different ethnic groups. However, this information is not collected at this time. The proposed change in fee is below the inflation level and <b>the impact is therefore considered to be low.</b></p> <p>The change on fee for hiring of grounds and green spaces may impact residents of different ethnic groups. For example, funfairs and circuses were historically run by individuals from the Gypsy and Traveller community. However, there is no data that identifies whether funfairs or circuses are run by the Gypsy and Traveller community in Croydon. Therefore, <b>the impact is considered to be low.</b></p>	<p>protected characteristic and those who don't.</p> <p>The change in fee is below the rate of inflation and therefore <b>minimal impact is anticipated.</b></p>	<p>In the 2011 census, 14.5% of people in Croydon had a language other than English recorded as their main language.</p> <p><a href="#">GLA poll results Cost of living 2022 - London Datastore</a></p>
Sexual Orientation	<p><b>None of the proposed changes are anticipated to impact this protected characteristic group more than other residents.</b></p>		N/A
Pregnancy or Maternity	<p>Changes in fees may impact on residents that are pregnant or on maternity if they are not working. However, additional benefits are provided for residents in this situation and therefore the <b>proposed changes are expected to have minimal impact.</b></p>		<p><a href="#">Maternity leave: Cost of living crisis highlights need for support (personneltoday.com)</a></p> <p>There were 5,252 births in Croydon in 2020. An estimated 30,000 women lose their jobs as a result of pregnancy every year, according to the Equality and Human Rights Commission (EHRC).</p>

	<p>Note: Data disaggregating level of service use by protected characteristic group is unavailable or available in sufficient granularity to draw conclusions in many cases. This will be explored and refined iteratively to inform mitigating strategies wherever practical to do so.</p> <p><b>Important note:</b> 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.</p> <p>See Mitigations and data held in Appendix 3.</p> <p>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. <b>Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact</b></p>
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### 3.2 Additional information needed to determine impact of proposed change

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

<p>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:</p>		
Additional information needed and or Consultation Findings	Information source	Date for completion
<p>The council’s current data collection of protect characteristics is weak in some areas and rich in others. We are currently carrying out a project to tackle this imbalance with the support of the Head of Profession for Business Intelligence and the Equalities Manager as well as analysts and services across the organisation.</p> <p>The Corporate Management Team and the Equality, Diversity and Inclusion Board are the driving force behind this work stream.</p> <p>Currently an ‘as is’ exercise is taking place to identify areas of weakness in collection that needs to be addressed. This will be followed by a ‘to be’ looking at the information across the council that we will want to collect and how we go about doing this. Due to having to implement new process for collection and the potential impact of GDPR this project will take place in phases.</p>	<p>Index of Deprivation by Lower Layer Super Output Areas (gov.uk). Other data sources to be identified and investigated.</p>	<p>Iterative</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

		1	2	3
	<b>Likelihood of Impact</b>			

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

<b>Key</b>	
<b>Risk Index</b>	<b>Risk Magnitude</b>
- 9	High
- 5	Medium
- 3	Low

**Table 3 – Impact scores**

Note: The data to populate this table is not available to inform the Equality Impact Score. Evidence for the above is drawn from the Index of Deprivation Score for the 5% most deprived areas in the country and should not be used to draw conclusions. Further research is planned to develop a more reliable indicator. And as stated previously, individual fee changes will require their own assessment, the table below represents a generic view:

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

## Equality Analysis

### 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:

#### Mitigations

Residents currently pay specific fees and charges for a wide range of activities and services such as building control services, planning application, car parking, leisure activities, care related charges etc. An increase in fees will affect all those in, and out of the borough, who pay to use specific service(s). It appears that there is no significant disproportionate impact on groups or individuals that share one or more protected characteristic. The Council has in place various schemes to support residents who experience financial difficulty, some of whom will fall within the protected characteristic groups and may be affected by the proposed increases, to help mitigate impact. Listed below are some examples of what support is currently available, taken from a wide range of support schemes across the council.

## Equality Analysis

- The council in partnership with Nimbus Disability offer a discount card to all children and young people on our disability register. The card is free and is part of a national access card scheme, giving benefits and discounts to facilities and activities across the country, such as leisure, sports and fitness, cinema etc.
- There are discounted rates for all leisure centre activities for Croydon residents with disabilities. If a disabled person needs a carer with them in order to access leisure centre services, the carer is entitled to free entry.
- Croydon council Leisure Centres offer discounted rates for residents Seniors 60+ years and Juniors 4-15 years
- Croydon Council Money Advice Service for advice on paying your bills and debt worries. All advice is independent and confidential.
- Council tax discount for care leavers, single person occupier, residents with disabilities, full-time students.
- Healthy Homes is Croydon Council's free energy advice service aimed at Croydon residents on low incomes, and those more vulnerable to the effects of living in a cold home (especially families with young children, older residents, and residents with pre-existing medical conditions).
- The council has a statutory duty to protect those on low or, or no income, and supports with claims for Council Tax support, Housing Benefit, universal Credit.
- Adult Social Care users are subject to a means tested financial assessment which will assess affordability to contribute to, or not, to service provision required (as defined by the Care Act 2014).

**Table 6. Decision on 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	<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. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</b></p> <p>Whilst changes in fees and charges may impact in some cases, this impact is considered to be minimal as set out in the information above.</p> <p>Mitigations and adjustments are already in place to support residents that may help them manage debt or financial vulnerability detailed. This includes signposting and discretionary support.</p>	X

## Equality Analysis

	<p>Service departments will need to collate data on their service users to monitor impact. Some departments will have existing service level data regarding some protected characteristics and not others. Where data does not currently exist, each service must create an action around collecting data across all protected characteristics. As data is received the EQIA should be updated, demonstrating data and evidence where change has been made.</p> <p>Residents should be provided with details of support organisations in both digital and non-digital formats.</p>	
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. <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></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. <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></p>	<b>X</b>
Stop or amend the proposed change	<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>	
<p>Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet</p>		<p>Meeting title: Cabinet Date: September</p>

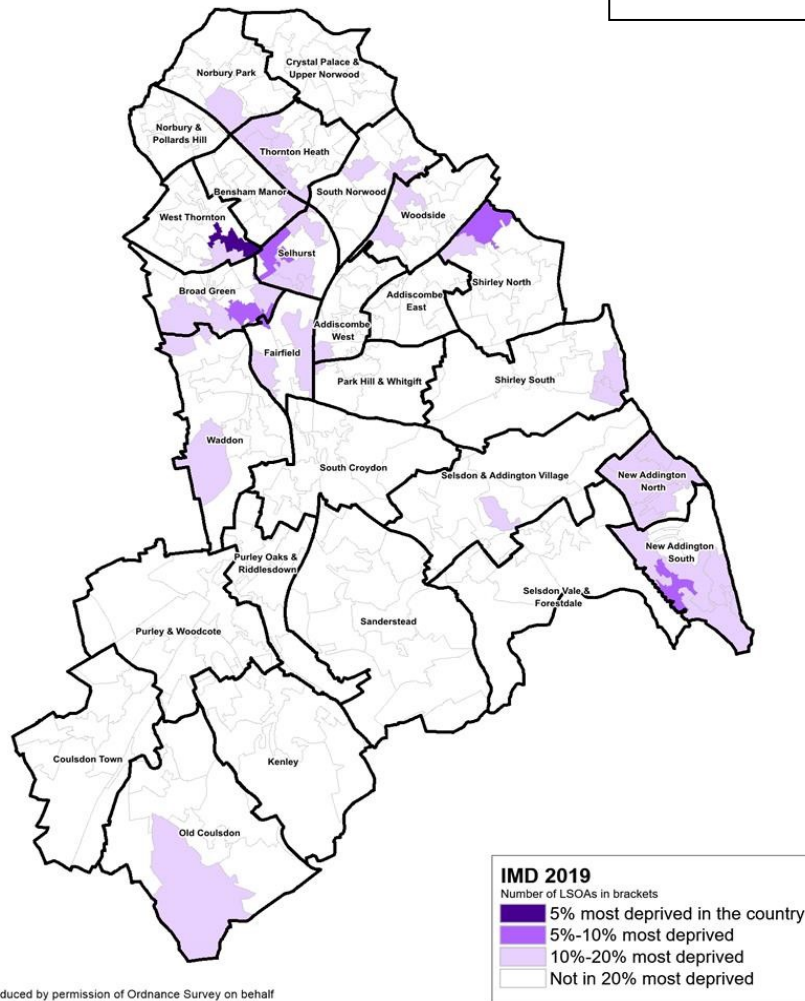
# Equality Analysis

## 7. Sign-Off

<b>Officers that must approve this decision</b>	
<b>Equalities Lead</b>	<b>Name: Denise McCausland    Date: 25 August 2022</b> <b>Position: Equality Programme Manager</b>
<b>Director</b>	<b>Name:        Gavin Handford</b> <b>Date: 25 August 2022</b> <b>Position: Director of Programmes, Policy &amp; Performance</b>

**Indices of Deprivation 2019**  
Croydon Lower Super Output Areas (LSOAs)

**INFOGRAPHIC 1**



In Croydon, 1567 people live amongst the country (Dark Blue)

In this area,

- 50% are male (Croydon 49%)
- 50% are female (Croydon 51%)
- 27% are 0-15 (Croydon 22%)
- 67% are 16-64 (Croydon 64%)
- 6% are 65+ (Croydon 14%)
- 30% are White ethnic group (Croydon 55%)

the 5% most deprived in the

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## Equality Analysis

35% are Black / African / Caribbean / Black British ethnic group (Croydon 20%)  
24% are Asian / Asian British ethnic group (Croydon 16%)  
7% are Mixed / multiple ethnic group (Croydon 7%)  
4% are Other ethnic group (Croydon 2%)