

# 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	Resources
Title of proposed change	Mayor's Business Plan 2022-2026
Name of Officer carrying out Equality Analysis	John Montes

### 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. Please also state if it is an amendment to an existing arrangement or a new proposal

The Mayor's Business Plan 2022-2026 will be the Council's core strategic document setting out its objectives and priorities for the next four years. It reflects the Executive Mayor's manifesto pledges and priorities, and the transformation priorities of the Council. The Plan sets out five outcomes for the Council to achieve, as well as the priority aims and high-level actions required to make them a reality. A detailed four-year delivery plan and performance framework will be developed and presented at a future meeting of the Cabinet. The outcomes and priority aims are as follows:

***OUTCOME 1: The Council balances its books, listens to residents and delivers good services***

1. Get a grip on the finances and make the Council financially sustainable.
2. Become a council which listens to, respects and works with Croydon's diverse communities.
3. Strengthen collaboration and joint working with partner organisations and the voluntary, community and faith sectors (VCFS).
4. Ensure good governance is embedded and adopt best practice.
5. Develop our workforce to deliver in a manner that respects the diversity of our communities.

***OUTCOME 2: Croydon is a place of opportunity for business, earning and learning***

6. Regenerate Croydon's town and district centres, seeking inward investment and grants.
7. Deliver a vibrant London Borough of Culture which showcases local talent and supports Croydon's recovery.
8. Support the local economy and enable residents to upskill and access job opportunities.

***OUTCOME 3: Every child and young person in Croydon has the chance to thrive, learn and fulfil their potential***

9. Ensure every child and young person has opportunities to learn, develop and fulfil their potential.
10. Make Croydon safer for young people.
11. Keep vulnerable children and young people safe from harm.

***OUTCOME 4: Croydon is a cleaner, safer and healthier place, a borough to be proud of***

12. Clean up our streets and open spaces so that Croydon is a place residents can feel proud of.
13. Tackle anti-social behaviour, knife crime and violence against women and girls so that Croydon feels safer.
14. Invest in council homes to drive up standards and develop a responsive and effective housing service.
15. Ensure new homes are safe, well-designed and in keeping with the local area.
16. Lead action to reduce carbon emissions in Croydon.

***OUTCOME 5: People can lead healthier and independent lives for longer***

17. Work with partners and the VCFS to promote independence, health and wellbeing and keep vulnerable adults safe.
18. Work closely with health services and the VCFS to improve resident health and reduce health inequalities.
19. Build a sense of community and civic life.

### 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. 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 Additional information needed to determine impact of proposed change

**Table 1 – 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.		
Additional information needed	Information source	Date for completion
N/A	N/A	
N/A	N/A	

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

#### 3.2 Deciding whether the potential impact is positive or negative

**Table 2 – 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><b>For older people:</b> The aim is to make best use of available resources with partners to develop a sustainable model of adult social care. The process will be informed by the co-designing of the Council's engagement model with people with lived experience. The measures in this Plan will promote the independence, health and wellbeing of older people and keep vulnerable older people safe. The Plan aims to maximise prevention, early intervention and independence, adopting a strengths-based approach, developing</p>	<p><b>For children and young people and older adults:</b> As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.</p>	<p><a href="#">Croydon Equality Strategy 2020 to 2024:</a></p> <ul style="list-style-type: none"> <li>• The estimated dementia diagnosis rate for 65+ years has been going up every year in Croydon.</li> <li>• 2.9% of all 85+ year olds in Croydon cannot speak English well or at all.</li> <li>• There has been a huge increase in unemployment for 18-24 year olds and 50-64 year olds since April 2020.</li> <li>• Since 2015 at local, regional and national levels there has been a lower</li> </ul>

	<p>reablement, direct payments and care technology offers, and supporting the development of homes that promote independence. It also aims to work with partners to support carers and make Croydon dementia friendly.</p> <p><b>For children and young people:</b> The Plan aims to ensure that every child and young person can learn, develop and fulfil their potential through work with partners on a youth offer, on mentoring, supporting vulnerable pupils and reducing school exclusions. Partnership work will make Croydon safer for young people and reduce involvement in youth crime, gangs and exploitation. The Plan aims to keep young people safe by transforming and redesigning services so families can access the right support in the right place at the right time, reducing the need for statutory support and intervention. The Council will ensure the voices of children, young people and their families are heard and inform service development and commissioning.</p>		<p>proportion of children from Black backgrounds achieving Attainment 8 scores</p> <ul style="list-style-type: none"> <li>• Like with England as a whole Black Caribbean pupils in Croydon have the greatest level of disproportionately when it comes to exclusion from school.</li> </ul>
Disability	<ul style="list-style-type: none"> <li>• The aim is to make best use of available resources with partners to develop a sustainable model of adult social care. This will be informed by the co-designing of the Council's engagement model with people with lived experience.</li> <li>• As with older people, measures in the Plan will promote independence, health and wellbeing of people with disabilities and keep vulnerable people safe.</li> <li>• An updated multi-agency Harm reduction and suicide prevention strategy will also aim to keep people with mental health issues safe.</li> <li>• More pupils with special educational needs and disabilities will be able to attend Croydon schools.</li> <li>• Measures to prevent homelessness and to invest in council homes will benefit people with disabilities.</li> </ul>	<p>As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.</p>	<p>2011 Census figures showed that 14.1% of the population in Croydon had their day-to-day activities limited to some extent by a long-term health problem or disability. 22,493 people had their day to-day activities limited a lot, whilst 28,134 had their day-to-day activities limited a little.</p>

Sex	The strategy to tackle violence against women and girls will aim to increase their safety and support victims.	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	Croydon's population is 51.9% female and 48.1% male (Census 2021)  In the 12 months to July 2022 Metropolitan Police Statistics recorded 5,230 domestic violence offences (13.4 per 1,000 population, the 4th highest rate in London).
Gender Reassignment Identity	Proposed changes are likely to positively impact this group in the same way as other protected groups.	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	The Gender Identity and Research Society has estimated that nationally 1% of the population may be gender variant to some degree, with 0.2% of the population likely to seek medical treatment, at some stage, to present in the opposite gender
Marriage or Civil Partnership			In the 2011 Census, 42.9% of Croydon residents were married, and 0.3% were in a registered same-sex civil partnership.
Religion or belief			56.4% of respondents to the 2011 Census in Croydon stated that they were Christian. 20.0% stated that they had no religion. 7.6% did not state their religion.
Race	<ul style="list-style-type: none"> <li>The Plan commits the Council to listen to, respect and work with Croydon's diverse communities.</li> <li>Measures to ensure that every child and young person can learn, develop and fulfil their potential will benefit black pupils, who are more likely to attain below-average scores and to be excluded from school.</li> <li>An annual programme of cultural and community events will help to bring communities together.</li> <li>Work with education and training partners and Croydon's diverse communities aims to create economic opportunity for all and offer all access to skills and jobs.</li> <li>Measures to prevent homelessness will benefit people of BAME backgrounds who are more likely to experience homelessness.</li> </ul>	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	<a href="#">Croydon Equality Strategy 2020 to 2024:</a> <ul style="list-style-type: none"> <li>Since 2015 at local, regional and national levels there has been a lower proportion of children from Black backgrounds achieving Attainment 8 scores.</li> <li>Black Caribbean pupils in Croydon (as in England as a whole) have the greatest level of disproportionately when it comes to exclusion from school.</li> </ul> <p>Live homelessness statistics:</p> <ul style="list-style-type: none"> <li>Whereas 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 (<a href="#">GOV.UK</a>) 53% of Croydon population are from BAME backgrounds (GLA,</li> </ul>

			<i>2016-based Round of Demographic Projections Local authority population projections - Housing-led ethnic group projections, November 2017.)</i>
Sexual Orientation	The proposed changes will positively impact this group in the same way as other protected groups.	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	<a href="#">Croydon Equality Strategy 2020 to 2024:</a> Based on ONS estimates, across London it was estimated that 2.6% of the population in 2014 identified themselves as gay, lesbian or bisexual.
Pregnancy or Maternity	Plans to invest in council homes and prevent homelessness will benefit young families who are more likely to be in housing need or homeless.	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	<a href="#">Croydon Equality Strategy 2020 to 2024:</a> Over the years, by far the highest proportion of accepted homeless households in Croydon have been made up of lone parents with dependent children ( <a href="#">Live tables on homelessness</a> )
<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>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.</p>			

### 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

**Table 4 – Impact scores**

<p><b>Column 1</b></p> <p><b>PROTECTED GROUP</b></p>	<p><b>Column 2</b></p> <p><b>LIKELIHOOD OF IMPACT SCORE</b></p> <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><b>Column 3</b></p> <p><b>SEVERITY OF IMPACT SCORE</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><b>Column 4</b></p> <p><b>EQUALITY IMPACT SCORE</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	2	2	4
Disability	2	2	4
Gender	2	2	4
Gender reassignment	2	2	4
Marriage / Civil Partnership	2	2	4
Race	2	2	4
Religion or belief	2	2	4
Sexual Orientation	2	2	4
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

**Table 5 – 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	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups.	Equality analyses will be conducted at that stage to identify them and mitigating actions developed.	Heads of service	TBC
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				
Age				
Religion or belief				
Pregnancy or maternity				
Marriage/civil partnership				

## 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>	
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> <i>The priorities and high-level actions of this plan aim to benefit several groups of people that share protected characteristics, with no negative impacts currently identified. They incorporate measures that will advance equality and foster good relations. The Plan includes measures to listen to and involve residents in the design and review of services. As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.</i>	X
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: Cabinet Date: 12 October 2022

## 7. Sign-Off

<b>Officers that must approve this decision</b>		
<b>Equality lead</b>	<b>Name:</b> Gavin Handford	<b>Date:</b> 06.09.2022
<b>Director</b>	<b>Name:</b> Gavin Handford	<b>Date:</b> 06.09.2022
	<b>Position:</b> Director of Policy, Programmes and Performance	