

Equality Analysis Form

Delivering for Croydon

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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 and Economic Recovery
Title of proposed change	Statutory 5 Year Review of Licensing Policy
Name of Officer carrying out Equality Analysis	Michael Goddard

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 Council is the Licensing Authority for the purposes of the Licensing Act 2003. We process applications and issue licenses for premises, such as public houses, off licenses and restaurants. The Act also requires the Council to draw up a policy document which sets out how it will carry out its functions under the Act. The original Policy was prepared in 2004 and the Act states that the document must be reviewed every 5 years – even if no changes are proposed. We last reviewed the document in 2017, so are required to review it in 2022. The Policy is primarily to assist in ensuring the successful management of licensed premises. Licence holders and their customers are the primary stakeholders. There are no service users as such, as it is the legislation that permits the activity (providing licensable activities) and the Act also contains the sanctions for poorly managed premises. The Licensing Act 2003 and supporting Regulations are also quite prescriptive, on both licence holders and the Council as Licensing Authority and take primacy over the Policy. The Statement therefore, in the main, reflects the requirements of the legislation, statutory guidance & codes of practice. The Council's current policy also includes four cumulative impact areas that relate specifically to premises that are licensed for the sale of alcohol for consumption 'off' the premises. These areas are all corridors along specific roads and (also showing the borough wards they pass through) are –

CIA 1 - Along the Brighton Road; South End; High Street, George Street corridor, from the Royal Oak Centre on Brighton Road, Purley to the junction of George Street and Cherry Orchard Road in Central Croydon (Purley Oaks & Riddlesdown/South Croydon/Waddon/Fairfield)

CIA 2 - Along the London Road/Streatham High Road corridor, in 3 sections; from the junction of London Road and Tamworth Road in West Croydon to the j/w Canterbury Road; from the j/w Broughton Road to the j/w Melrose Avenue and; from the j/w Northborough Road to the borough boundary with London Borough of Lambeth (Fairfield/Broad Green/West Thornton/Bensham Manor/Norbury & Pollards Hill)

CIA 3 - Along the Brigstock Road and High Street, Thornton Heath corridor, from the junction of Brigstock Road and London Road in Thornton Heath to the junction of High Street, Thornton Heath and Whitehorse Lane (West Thornton/Bensham Manor/Thornton Heath)

CIA 4 - Along the length of Central Parade, New Addington (New Addington South)

It is proposed to retain the above 4 existing CIA's and in addition, a further proposal in the consultation on the review of the policy was the introduction of a new, 5th cumulative impact area along the length of High Street, South Norwood from the junctions with Oliver

Grove and Station Road to the junction with Lancaster Road and Portland Road, South Norwood from the junction with High Street to the junction with Spring Lane (South Norwood/Woodside). If introduced, this would be CIA 5.

The effect of a Cumulative Impact Area is that where relevant representations are received on any new applications for a premises licence to sell alcohol off the premises, or on a material variation to an existing such premises licence there will be a presumption under the special policy that the application will be refused. Cumulative Impact is intended to be strict, and will only be overridden in genuinely exceptional circumstances however, the Licensing Authority will not apply these policies inflexibly. It will always consider the individual circumstances of each application; even where an application is made for a proposal that is apparently contrary to policy.

In the current policy document, the Council sets out that it recognises its legal obligation under the Equality Act 2010 to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and foster good relations between people who share a characteristic and those who don't. The Council will assess and consult on the likely impact and monitor for any adverse impact on the advancement of equality which may arise as a result of this Policy Document and will publish the results.

A public consultation on the statutory review of the Council's licensing policy was conducted between 4 October and 15 November 2022. There was significant support from the respondents for the proposals in the policy review in respect of cumulative impact. The EqIA has been updated to reflect the responses to the consultation, which did not provide any evidence of negative impacts in respect of each protected characteristic, proving useful service data for future use.

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 policy supports the legislation which makes it an offence to sell alcohol to persons under 18. The introduction of cumulative impact areas is to assist with the negative impacts on the licensing objectives in the Licensing Act 2003 which include the prevention of crime and disorder and the protection of children from harm.</p>	<p>It is acknowledged that there is the potential that alcohol consumption may have secondary impacts but the policy seeks to protect against negative impacts through advice and regulation. The work of the responsible authorities in the Licensing Act 2003, such as the Police and the Council's Trading Standards Team aims to mitigate risks. The policy deals with the licensing of premises that sell alcohol rather than individuals.</p>	<p>The four existing cumulative impact areas and the proposed new 5th one fall within the following twelve wards in the borough. Croydon Observatory statistics show the population by age %'s* in these wards to be as follows: Purley Oaks & Riddlesdown 0-15 years 21% 16-64 years 64%. South Croydon 0-15 years 22% 16-64 years 67%. Waddon 0-15 years 24% 16-64 years 65%. Fairfield 0-15 years 21% 16-64 years 74%. Broad Green 0-15 years 26% 16-64 years 66%. West Thornton 0-15 years 24% 16-64 years 64%. Bensham Manor 0-15 years 23% 16-64 years 65%. Norbury & Pollards Hill 0-15 years 21% 16-64 years 65%. Thornton Heath 0-15 years 24% 16-64 years 66%. New Addington South 0-15 years 26% 16-64 years 61%. South Norwood 0-15 years 23% 16-64 years 66%. Woodside 0-15 years 23% 16-64 years 67%.</p>

			<p>*The minimum age for the purchase of alcohol is 18 years so it would be better if these figures were able to reflect 0-17 years but they do nonetheless give a clear indication. The Council licenses the premises that alcohol is sold from. To mitigate risk to U18's, if a premises is found to be selling alcohol to U18's, enforcement action by review or prosecution can be taken.</p> <p>A public consultation on the statutory review of the Council's licensing policy was conducted between 4 October and 15 November 2022. There was significant support from the respondents for the proposals in the policy review in respect of cumulative impact.</p>
Disability	No perceived positive impact.	No perceived negative impact.	The consultation did not highlight any specific concerns in relation to disability which were or were perceived to be impacted by the proposals in the policy.
Sex Gender Reassignment Identity Marriage or Civil Partnership Sexual Orientation Pregnancy or Maternity	Alcohol related crime harm shows that over half committed were sexual offences and around a third was violence related. Alcohol related crime is closely linked to domestic violence. Please note however – the consumption of alcohol is not a licensable activity and so the policy cannot directly	It is acknowledged that there is the potential that alcohol consumption may have secondary impacts but the policy seeks to protect against negative impacts through advice and regulation. The work of the responsible authorities	Crime Survey for England and Wales shows a strong relationship between alcohol and a range of crimes including violence. Council Violence Reduction Network (VRN) data shows that over

	<p>regulate that. The licensable activity is the sale of alcohol and the cumulative impact areas are to assist with the negative impacts on the licensing objectives in the Licensing Act 2003 which include the prevention of crime and disorder and the protection of children from harm.</p>	<p>in the Licensing Act 2003, such as the Police and the Council's Trading Standards Team aims to mitigate risks. The policy deals with the licensing of premises that sell alcohol rather than individuals.</p>	<p>60% of alcohol related crime volume in the borough in 21/22 was violence against the person. Alcohol related crime harm in the same period shows that over half committed were sexual offences and around a third was violence related. Alcohol related crime is closely linked to domestic violence. VRN data shows the proportion of all alcohol related crime volume flagged as domestic has been increasing over the last 5 years with over 40% of all crime being domestic in 21/22. In contrast though, the proportion of all alcohol related crime harm flagged as domestic has remained relatively stable over the last 5 years, with it being 27% in 21/22.</p> <p>Croydon Observatory statistics show the number of violence and sexual offences per 1000 persons between July 21 and June 22 in the wards in the borough in which the four existing cumulative impact areas and the proposed new 5th one fall to be as follows:</p> <ul style="list-style-type: none">Purley Oaks & Riddlesdown 13 per 1000South Croydon 28 per 1000Waddon 36 per 1000Fairfield 86 per 1000Broad Green 45 per 1000
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			<p>West Thornton 44 per 1000 Bensham Manor 27 per 1000 Norbury & Pollards Hill 21 per 1000 Thornton Heath 40 per 1000 New Addington South 31 per 1000 South Norwood 32 per 1000 Woodside 30 per 1000</p> <p>To deal with/mitigate risk, licensed premises that are associated with crime and disorder can be dealt with by licence review or prosecution.</p> <p>A public consultation on the statutory review of the Council's licensing policy was conducted between 4 October and 15 November 2022. There was significant support from the respondents for the proposals in the policy review in respect of cumulative impact.</p>
<p>Religion or belief</p>	<p>It is acknowledged that there may be negative impacts from the consumption of alcohol and that religion and belief may impact on views as to the acceptability of consumption of alcohol but the statutory mechanisms and policy relate to among other matters, the regulation of sale of alcohol rather than regulating the consumption of alcohol, which is not a licensable activity and not something which the Council can legally seek to</p>	<p>It is acknowledged that there is the potential that alcohol consumption may have secondary impacts but the policy seeks to protect against negative impacts through advice and regulation. The work of the responsible authorities in the Licensing Act 2003, such as the Police and the Council's Trading Standards Team aims to mitigate risks. The policy deals with the licensing of</p>	<p>Croydon Observatory statistics provide details of the makeup, in % terms of different religions in each of the 12 wards within which the four existing and the one new, proposed cumulative impact areas fall and that information can be found, under the Population heading, at the following link - Population - UTLA Croydon</p>

	<p>control via its policy. However, the policy under consideration proposes cumulative impact areas which are a statutory mechanism available to Licensing Authorities subject to necessary evidence. Cumulative impact areas are areas where there is a perceived negative impact on the Licensing Objectives (protection of children from harm, prevention of public nuisance, prevention of crime and disorder and public safety) as a result of a proliferation of particular types of premises in certain areas which are together having a cumulative impact. The cumulative impact areas proposed (having regard to the evidence base as detailed in the report to Licensing Committee and the outcome of the consultation) for inclusion in the policy only relate to shops, supermarkets and off licenses that sell alcohol for consumption off the premises but are proposed with a view to mitigate the potential negative cumulative impact of a proliferation of these types of premises in the identified areas.</p> <p>It must be noted that only the sale of alcohol is a licensable activity. Consumption of alcohol is not.</p>	<p>premises that sell alcohol rather than individuals.</p>	<p>Report Builder for ArcGIS (croydonobservatory.org)</p> <p>To deal with/mitigate risk, licensed premises that are associated with crime and disorder can be dealt with by licence review or prosecution.</p> <p>The policy proposals relate to the conduct of licence holders rather than seeking to control the behaviour of individuals in whether they choose to consume alcohol or not. Seeking to control the behaviour of individuals in whether they choose to consume alcohol or not, is not within the remit of the Licensing Regime. Non-Licensing measures such as public spaces protection orders can, subject to the necessary evidence, be used to control the consumption of alcohol in public places.</p> <p>A public consultation on the statutory review of the Council's licensing policy was conducted between 4 October and 15 November 2022. There was significant support from the respondents for the proposals in the policy review in respect of cumulative impact.</p>
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<p>Race</p>	<p>Data indicates that alcohol is a factor in crime and it could be deduced that the higher population percentage in each ward may be affected to a greater degree by the sale of alcohol in that area. As examples, in Purley Oaks & Riddlesdown, this will be the predominantly white population of 65.6% and in Broad Green, this would be the predominate ethnic minority population of 72.7%. However, the introduction of cumulative impact areas is to assist with the negative impacts on the licensing objectives in the Licensing Act 2003 which include the prevention of crime and disorder and the protection of children from harm.</p>	<p>It is acknowledged that there is the potential that alcohol consumption may have secondary impacts but the policy seeks to protect against negative impacts through advice and regulation. The work of the responsible authorities in the Licensing Act 2003, such as the Police and the Council's Trading Standards Team aims to mitigate risks. The policy deals with the licensing of premises that sell alcohol rather than individuals.</p>	<p>The four existing cumulative impact areas and the proposed new 5th one fall within the following twelve wards in the borough. The cumulative impact areas have been selected based on the data collated from public health and the violence reduction network. This data is detailed in the report to the Licensing Committee of 29 November 2022 and forms part of the proposed policy.</p> <p>Croydon Observatory statistics show the percentage split between the white and ethnic minority populations in each ward to be as follows:</p> <p>Purley Oaks & Riddlesdown White 65.6% Ethnic Minorities 34.4%</p> <p>South Croydon White 59% Ethnic Minorities 41%</p> <p>Waddon White 50.7% Ethnic Minorities 49.3%</p> <p>Fairfield White 42.3% Ethnic Minorities 57.7%</p> <p>Broad Green White 27.3% Ethnic Minorities 72.7%</p> <p>West Thornton White 22% Ethnic Minorities 78%</p> <p>Bensham Manor White 24.7% Ethnic Minorities 73.3%</p>
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			<p>Norbury & Pollards Hill White 31.2% Ethnic Minorities 68.8%</p> <p>Thornton Heath White 30.4% Ethnic Minorities 69.6%</p> <p>New Addington South White 73.7% Ethnic Minorities 26.3%</p> <p>South Norwood White 37% Ethnic Minorities 63%</p> <p>Woodside White 41.8% Ethnic Minorities 58.2%</p> <p>A public consultation on the statutory review of the Council's licensing policy was conducted between 4 October and 15 November 2022. There was significant support from the respondents for the proposals in the policy review in respect of cumulative impact.</p>
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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
<p>An initial report was taken to the Licensing Committee on 26 September to make them aware of the statutory requirement to review the existing policy and also of any proposed changes to the policy. There was then a 6 week public consultation between 4 October and 15 November 2022 following which a further report was prepared which was taken back before the Licensing Committee on 29 November with the outcome of the consultation and any responses received. Groups such as the BME Forum, the Asian Resource Centre and CVA were included in the consultation. The Licensing Committee recommended adoption of the revised policy and this will now be taken to Full Council.</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

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

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	2	1	2
Disability	1	1	1
Gender	2	1	2
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	2	1	2

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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 Age Race Sex (gender) Gender reassignment Identity Sexual orientation	None	Enforcement action available, ie. review or prosecution. The policy also sets out that the Council will expect applicants to demonstrate in their application that suitable and sufficient measures have been identified and will be implemented	Responsible Authorities under the Licensing Act 2003, ie. Police. Residents may also apply for the	

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<p>Pregnancy or maternity Marriage/civil partnership Religion or belief</p>		<p>and maintained so as to minimise or prevent crime and disorder in and around the vicinity of their premises. It then lists potential measures, such as installing cctv with cameras covering relevant areas, appropriate storage of alcohol, maintaining appropriate signage and a refusal log for refused sales of alcohol, appropriate instruction, training and supervision of those employed to prevent incidents of crime and disorder, provision of litter bins and security measures, such as lighting outside premises, not selling certain alcohol types/strengths (eg. high strength beers/ciders or single cans above 6% ABV and restricting sales on certain alcohol types, for example miniature spirits. In addition, licence holders are encouraged to adopt best practice, for instance those relating to drinks promotions ie. Point of Sale Promotions published by the British Beer and Wine Association. In addition, during the 28 day consultation</p>	<p>review of a premises licence.</p>	
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		<p>period after an application is submitted, responsible authorities, such as the Police and the Council’s Trading Standards service discuss with applicants and often agree amendments to applications to have further conditions attached to minimize the risk of crime and disorder. The policy states ‘It is essential that licensed premises are maintained and operated so as to ensure the continued promotion of the licensing objectives and compliance with the specific requirements of the 2003 Act and it is the responsibility of premises licence holders and designated premises supervisors (where applicable) to ensure this happens and that regulatory compliance is maintained.’</p>		
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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	<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. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</p> <p>The Policy is primarily to assist in ensuring the successful management of licensed premises. Licence holders and their customers are the primary stakeholders. There are no service users as such, as it is the legislation that permits the activity (providing licensable activities) and the Act also contains the sanctions for poorly managed premises. The Licensing Act 2003 and supporting Regulations are also quite prescriptive, on both licence holders and the Council as Licensing Authority and take primacy over the Policy. The Statement therefore, in the main, reflects the requirements of the legislation, statutory guidance & codes of practice. Enforcement action is available to the responsible authorities in the Licensing Act 2003 to deal with premises that are not promoting the licensing objectives. Please note that the policy has been updated to include at paragraphs 6.14 & 6.15 which reflect the following -</p> <p>“6.14 Applicants and licensees must make themselves familiar with the law and their responsibilities set out within the Equality Act 2010 and relevant guidance for businesses, which can be found on the Equality & Human Rights Commission website</p> <ul style="list-style-type: none"> • The Act makes discrimination against any person (including employees and customers) unlawful. • Section 149 (7) of the Act defines the relevant protected characteristics as age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. • Any activity in breach of the Act may be considered an offence and may lead to enforcement by the Equality and Human Rights Commission. <p>6.15 The Council recognises its public sector equality duty under the Equality Act 2010 and the legal obligation to have due regard, when exercising its functions, to the need to eliminate unlawful discrimination, harassment</p>	X

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	and victimisation and other conduct prohibited by the Act, to advance equality of opportunity between people who share a protected characteristic and those who do not and to foster good relations between people who share a protected characteristic and those who do not.”	
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	
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Equalities Lead	Name: Gavin Handford Date: 02/12/2022 Position: Director of Policy, Programmes & Performance
Director	Name: Date: Position: