

# Equality Analysis : Revenue Budget and Council Tax Levels 2023/24

## 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

<b>Directorate</b>	<b>All</b>
<b>Title of proposed change</b>	<b>Revenue Budget and Council Tax Levels 2023/24</b>
<b>Name of Officers carrying out Equality Analysis</b>	Gavin Handford, Denise McCausland, Felisha Dussard, Laura McCartney

### 2.1 Purpose of proposed change

The Council is obliged to set a balanced budget and council tax charge in accordance with the Local Government Finance Act 1992.

This equalities impact assessment relates to the 2023/24 revenue budget proposals regarding:

- A council tax increase of 12.99% and a 2% increase in the adult social care precept levy.
- Proposed savings, demand pressures, and inflation.
- Legacy financial issues and budget corrections
- Fees and charges (only brief summary is given in this EQIA, as a separate EQIA has been prepared in relation to fees and charges)
- Budget risks, reserves and balances.
- An update on discussions with Central Government.

### Context for Change

#### *Changing Demographics*

Data from the 2021 census shows that Croydon's population has grown by 7.5% since the 2011 census to 390,800. This is slightly lower than the increase for London (7.7%). Other comparative data from 2021 Census:

- Croydon ranked 16th for total population out of 309 local authority areas in England.
- Croydon has the highest population in London.
- The number of households has increased to close to 160,000 compared to 145,000 recorded in Census 2011.
- Croydon is the 10th least densely populated of London's 33 local authority areas

In Croydon,

- 52% of the population are female.
- 19.3% of the population are under 15 and 13.6% over 65

Based on the age bandings for delivering services in Croydon:

- 23.1% of residents in Croydon are aged 0-17 years
- 63.3% are aged between 18 and 64 years
- 13.6% are aged 65 years or over

A number of the proposals within the Revenue Budget may impact council officers directly, data presented to the council's Equality Diversity and Inclusion Board in January 2023 provided an overview of the officer make up of various protected groups. This is included in the appendix.

***A council tax increase of 12.99% and a 2% increase in the adult social care precept levy.***

On Monday 06 February 2023 the Local Government Settlement was published by the Department for Levelling Up, Homes, and Communities (DLUCH). As part of that settlement announcement, DLUHC set the level of increase in council tax, or, set the council tax cap that councils can consider charging. For most councils in the country the cap is a 4.99% increase to council tax bills.

However, the Government has given Croydon Council (along with Slough, and Thurrock) permission to increase council tax above the 4.99% cap. Because of the seriousness of the financial situation, Croydon has been given permission to increase council tax above that national 4.99% cap by 10% to 14.99%.

Without this proposed increase the council would need to identify and deliver a further £20 million in savings, in addition to the £36 million that are already being put forward within the budget that this EQIA accompanies.

The council have so far made savings of £90m to service budgets over the last two years, and the DLUHC appointed Improvement and Assurance Panel have been clear that we cannot continue to make cuts at this level.

The council recognises that this is a significant increase, and that the scale of our financial problems means that we must look at every option possible to protect vital services. In addition, it is important that all residents are supported to pay the council tax due for their households. The council has a Council Tax Support Scheme in place to support those on low incomes and has proposed as part of this budget an additional £2m Hardship Fund from 2023/24 onwards which will be available for households struggling to pay the council tax increase to access. The council takes an ethical approach to council tax collection focussing on collecting debts swiftly from households that can pay and supporting households that are struggling to make ends meet. In response to questions from the Scrutiny and Overview Committee, details of the council's approach to debt collection are attached as Annex A to this EQIA.

As of July 2022, there were 7,028 low-income families in Croydon where their monthly income is below their estimated costs. (This figure represents households that claim benefit through the council, only). If costs were increased by £19.62 a month for these households (this is by working out a monthly 15% increase on a Croydon band D house) then there would be a further 262 households with a monthly income below their estimated costs. There are mitigations being put in place to support these households, and those like them, which can be found in section 5 of this Equality Impact Assessment.

***Proposed savings, demand pressures, and inflation.***

Adult Social Care accounts for more expenditure at Croydon than any other service (31% of net budget). The pressures in this area are felt across the country. However, we know that our cost base is too high and we can learn from other Councils. Working closely with an external LGA Adults and Finance expert, we have reviewed every aspect of our savings and transformation plan, and modelled these based on LGA recommendations.

The service offer remains the same, and as outlined in the principles below:

- Our adult social care services reflect the relevant legislation underpinning social care and health through the Care Act (2014).
- All packages are assessed or reviewed, proportionately, through a strengths based approach, considering safeguarding, to meet the needs of the individual and carers.
- Residents can access appropriate services provided in-house or commissioned by the Council, or delivered independently by the voluntary and community sector.
- Where people have the financial means to pay a contribution, or to pay for their care in full, this will be in line with the self-funding legislations outlined in the Care Act and wider National policy.

Within Council services supporting Children, Young People, Families and Education there are a range of proposals to improve the effectiveness of services, with practices improvements, restructures and service efficiencies. These are not expected to have an impact on residents/clients. Where there are restructures, separate EQIAs will be undertaken to understand the impact on staff, and this will be shared with trade unions and affected staff.

### ***Legacy financial issues and budget corrections***

The legacy financial issues that Croydon Council are facing are well documented, and form part of the rationale behind both the proposed Council Tax increase, and the proposed savings already referred to. Within the Revenue Budget there are also a number of accounting proposals to ensure that services are funded at the appropriate level, from the appropriate budget(s).

A significant proportion of the budget proposals are accounting corrections and amendments. Whilst these have an impact on the budget overall, they do not directly impact on service changes, and therefore do not impact on protected characteristics.

### ***Fees & Charges: See separate EQIA***

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. The Council has a need to balance its budget which an increase in fees would support. The Council is also mindful of the impact of an increase on the residents that it delivers its services to may have.

A separate EQIA has recently been completed solely focusing on Fees and Charges.

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

### **Conversations with Central Government**

DLUHC and the Improvement and Assurance Panel have been fully involved in the discussion around the council tax increase and agree that this is the next step to take, along with Central Government continuing to support the council financially.

### 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>PLEASE NOTE: As this report covers a wide range of Council services, 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, 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>		
Protected characteristic group(s)	Negative Impact	Positive impact	Source of evidence
Age	The Revenue Budget and Council Tax Levels 2023/24 may have an impacts that vary across this protected characteristic	The budget seeks to reduce spend on looked after children placements. Less children will be exposed	Croydon's population continues to age with those over 65 increasing by 19.7% since the 2011 Census. The

	<p>group. In some cases the impact may be significantly greater than for other residents.</p> <p>The mitigations for any potential negative impacts listed below are laid out in section five of this report.</p> <p>As set out in the separate EQIA, there are fees that may affect younger / older residents more. However, the impact is considered to be low as the fee increase is below overall inflation levels. In relation to adult social care, financial assessments are in place for these services.</p> <p>Savings are proposed from placement costs for looked after children. This is primarily achieved through gatekeeping controls on costs at the point of identifying suitable placements; ensuring effective support is provided to enable children to remain living at home or within their wider family network.</p> <p>Proposed savings may impact upon provision for 18-25 year olds with no recourse to public funds, with an All Rights Exhausted immigration status. The approach is to ensure that accommodation and subsistence is provided to former UASC young people in line with legislation and home office guidance.</p> <p>Savings are proposed through the removal of Non-Contractual Overtime (NCO) – there is a possibility that NCO is largely undertaken by certain roles within the council which may impact some groups more than others. For example, NCO is less common in senior roles. Therefore this may have a negative impact on some of our</p>	<p>to the negative impacts of being 'in care'.</p> <p>Changes to the fostering service will see fostering hubs set up around the borough to support foster carers better, as well as the children in their care. Foster carers are being included in the information gathering stages to inform this.</p>	<p>median age also increased by two years, from 35 to 37 years of age.</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>
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	<p>junior colleagues, who – on average – are younger.</p> <p>Proposed changes to Youth Services may see a reduction in provision for young people.</p>																		
<p>Disability</p>	<p>The Revenue Budget and Council Tax Levels 2023/24 may have an impact on this protected characteristic group that is significantly greater than any other resident.</p> <p>Where a claimant or partner are disabled and not working a deduction may be introduced for any other adult living in the property.</p> <p>For Disabled claims where the claimant or partner are working they may be impacted, along with all other working age claims by the final outcome on the proposal to change the rate by which the income bands are increased</p> <p>The mitigations for any potential negative impacts listed below are laid out in section five of this report.</p> <p>External factors mean some disabled residents face higher costs in areas such as energy use, which may in turn impact their ability to meet any increased costs proposed by Croydon Council.</p> <p>In terms of Council Tax increases it is reasonable to expect those already in receipt of Council Tax Support to be further impacted by a rise in Council Tax, the mitigating factors shown later in the EQIA will therefore be essential to supporting this group of residents.</p>		<table border="1" data-bbox="1570 325 2150 836"> <thead> <tr> <th>Disability</th> <th>Croydon</th> </tr> </thead> <tbody> <tr> <td>Total: All usual residents</td> <td>390,719</td> </tr> <tr> <td>Disabled under the Equality Act</td> <td>54,852</td> </tr> <tr> <td>Disabled under the Equality Act: Day-to-day activities limited a lot</td> <td>23,716</td> </tr> <tr> <td>Disabled under the Equality Act: Day-to-day activities limited a little</td> <td>31,136</td> </tr> <tr> <td>Not disabled under the Equality Act</td> <td>335,867</td> </tr> <tr> <td>Not disabled under the Equality Act: Has long term physical or mental health condition but day-to-day activities</td> <td>21,978</td> </tr> <tr> <td>Not disabled under the Equality Act: No long term physical or mental</td> <td>313,889</td> </tr> </tbody> </table> <p>Employment rates for disabled people, across all ages, are significantly lower than those of non-disabled people.</p> <p><a href="https://www.gov.uk/government/statistics/the-employment-of-disabled-people-2021">The employment of disabled people 2021 - GOV.UK (www.gov.uk)</a></p> <p>In 28% of Council Tax Support claims either the claimant or partner are disabled and neither are in work, and 3% of claims are classified as disabled working claims meaning either the claimant or partner are disabled and either are in work.</p> <p>(Source: Croydon Council Tax Support Scheme EQIA, 2023)</p>	Disability	Croydon	Total: All usual residents	390,719	Disabled under the Equality Act	54,852	Disabled under the Equality Act: Day-to-day activities limited a lot	23,716	Disabled under the Equality Act: Day-to-day activities limited a little	31,136	Not disabled under the Equality Act	335,867	Not disabled under the Equality Act: Has long term physical or mental health condition but day-to-day activities	21,978	Not disabled under the Equality Act: No long term physical or mental	313,889
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	<p>The proposed closures of the Cherry Hub garden centre and Whitehorse centre are likely to have a negative impact on people with a learning disability:</p> <p>The service provides a specialised opportunity in the form of supported volunteering which may be difficult to replicate even in alternative volunteer opportunities such as charity shops.</p> <p>The proposed closure may affect the needs of carers / family of those attending if the alternative offered is not accepted or transition to a new service is not successful.</p>		
Sex	<p>The Revenue Budget and Council Tax Levels 2023/24 are unlikely to have any impact on this protected characteristic group that is greater than any other resident unless a service is utilised by one sex one sex more than another.</p> <p>A separate EQIA has been completed in relation to fees and charges, where there may be some impact on this protected characteristic.</p>		<p>203,000 (51.9%) residents in Croydon are female and 187,600 are male (48.1%).</p> <p>(Source 2021 Census)</p> <p>Of 16,260 Council Tax Support single claims by females, 11,795 are from working age claimants and of the 6,263 male claims 4,187 are working age. These claimants will be effected by the change to the amount the income bands will be increased.</p> <p>(Source: Croydon Council Tax Support Scheme EQIA, 2023)</p>
Gender reassignment/identity	<p>The Revenue Budget and Council Tax Levels 2023/24 are unlikely to have any impact on this protected characteristic group that is greater than any other resident.</p> <p>A separate EQIA has been completed in relation to fees and charges, where there may be some impact on this protected characteristic.</p>		<p>According to the ONS Census 2021, of all the Croydon residents aged 16 years and over who responded, 91.6% stated that their gender identity was the same as their sex registered at birth.</p> <p>7.5% of those who responded did not answer the gender identity question Only 0.9% stated that they had a different gender identity.</p>



<p>Marriage or Civil Partnership</p>	<p>The Revenue Budget and Council Tax Levels 2023/24 are unlikely to have any impact on this protected characteristic group that is greater than any other resident.</p> <p>The changes in registrars' fees will impact on individuals from all characteristics who have with the intention of entering into marriage or civil partnership. This is detailed in the separate Fees and Charges EQIA.</p>		<p>Wedding costs – source:  <a href="https://www.compareweddinginsurance.org.uk/blog/average-cost-uk-wedding.php">https://www.compareweddinginsurance.org.uk/blog/average-cost-uk-wedding.php</a></p> <p>The borough data on marital status is as follows:</p> <ul style="list-style-type: none"> <li>• 32.8% Married</li> <li>• 34.1% Single</li> <li>• 8.5% Divorced or Separated</li> <li>• 3.7% Widowed</li> <li>• 20.6% No response to question</li> </ul> <p>493 people were registered in a same sex civil partnership  279 people were registered in an opposite sex civil partnership.</p> <p>(Source: Census 2021)</p> <p>4107 (15%) claims of Croydon's Council Tax Support Scheme current case load are those made by couples, the remaining 22,559 (85%) are from single claimants.</p> <p>Whether or not the couples are married or in a civil partnership, or are unmarried partners does not affect the way the claims are calculated. We do not hold specific details regarding if a couple are married or not as we do not ask that specific question in our application form, rather if they have a partner.</p> <p>(Source: Croydon Council Tax Support Scheme EQIA, 2023)</p>
<p>Religion or belief</p>	<p>The Revenue Budget and Council Tax Levels 2023/24 are unlikely to have any impact on this protected characteristic group that is greater than any other resident.</p> <p>The changes in bereavement fees may impact residents based on their religion or belief. This is detailed in the separate Fees and Charges EQIA. The fee increases are below inflation and the percentage</p>		<p>The predominant religion of Croydon is Christianity. According to the <a href="#">2021 census</a>, the borough has over 190,880 Christians (48.9%), 40,717 Muslims (10.4%) and 23,145 Hindu (5.9%) residents.</p> <p>101,119 (25.9%) Croydon residents stated that they are <a href="#">atheist</a> or <a href="#">non-religious</a> in the 2021 Census.</p> <p>6.9% did not answer the question on religion.</p>

change between burial and cremation is consistent.

Race

The Revenue Budget and Council Tax Levels 2023/24 may have an impact on this protected characteristic group that is significantly greater than any other resident.

Residents who identify as Black are the largest group in receipt of Council Tax support (although nearly half of recipients have not declared).

In respect of Housing Benefit support, the risk that the resident or landlord does not meet the criteria and that they can no longer stay in the property is more likely to affect Black African and Black Caribbean claimants as they make up the largest percentage of the caseload (excluding the unknown category)

The proposal to reduce Non-Contractual Overtime (NCO) may impact officers sharing this protected characteristic as there is a possibility that NCO is largely undertaken by certain roles within the council which may impact some groups more than others. For example, workforce data shows that our workforce is less diverse in more senior roles. NCO is less common in senior roles. Therefore this may have a negative impact on Global Majority officers. However this will be mitigated in appropriate planning, reviews and consultation. Risks and issues associated with this will be managed within the appropriate project resource

Broad Ethnic Group Changes in Croydon from Census 2011 to Census 2021

	White	Black	Asian	Mixed	Other
2011	55.1 %	20.2 %	16.4 %	6.6%	1.8%
2021	48.4 %	22.6 %	17.5 %	7.65	3.9%

In 2021, 22.6% of Croydon residents identified their ethnic group within the "Black, Black British, Black Welsh, Caribbean or African" category, up from 20.2% in 2011. The 2.5 percentage-point change was the largest increase among high-level ethnic groups in this area.

Across London, the percentage of people from the "Black, Black British, Black Welsh, Caribbean or African" ethnic group increased from 13.3% to 13.5%, while across England the percentage increased from 3.5% to 4.2%.

In 2021, 48.4% of people in Croydon identified their ethnic group within the "White" category (compared with 55.1% in 2011), while 17.5% identified their ethnic group within the "Asian, Asian British or Asian Welsh" category (compared with 16.4% the previous decade).

The percentage of people who identified their ethnic group within the "Mixed or Multiple" category increased from 6.6% in 2011 to 7.6% in 2021.

Languages in Croydon

A separate EQIA has been completed in relation to fees and charges, where there may be some impact on this protected characteristic. However, the impact is considered to be low.

Where service data is held there is not currently a proposal within the revenue budget that negatively impacts on racial group over any other.

According to the Census 2021,

- 84.0% of the residents who can speak in Croydon speak English as their first language.
- 7.8% speak a European language.
- 6.3% speak an Asian language.

[Mayor urges Government to tackle the cost of living crisis | London City Hall](#)

[December 2022 - GLA YouGov Cost of living poll results.pdf \(airdrive-secure.s3-eu-west-1.amazonaws.com\)](#)

Where a Council Tax Support Scheme claimant has provided their race this has been recorded and the current caseload is broken down as follows:

	Number	% of caseload
Asian or Asian British: Bangladeshi	162	1%
Asian or Asian British: Indian	387	1%
Asian or Asian British: Pakistani	546	2%
Asian or British : Any other Backgrnd	571	2%
Black-Black British:African	2098	7%
Black-Black British:Caribbean	2426	8%
Black-Black British:Other	2433	8%
Chinese	55	0%
Mixed :Any other mixed background	252	1%
Mixed: White and Asian	235	1%
Mixed: White and Black Caribbean	460	2%
White: British	4755	17%
White: Any other White background	1203	4%
Not Known	13077	46%
Total	28660	

(Source: Croydon Council Tax Support Scheme EQIA, 2023)

<p>Sexual Orientation</p>	<p>Our data does not identify that any of the proposed changes are anticipated to impact this protected characteristic group more than other residents with regard to the majority of services. However we are improving our data collection and usage in this area to ensure that our services pay due regard to sexual orientation.</p>		<p>According to the ONS Census 2021, of the residents aged 16 years and over who responded to the survey:</p> <ul style="list-style-type: none"> <li>• 87.8% self-classified as Straight or Heterosexual.</li> <li>• 1.5% stated they were Gay.</li> <li>• 1.2% stated they were Bi-Sexual</li> <li>• 0.4% stated All other sexual orientations</li> <li>• 9.1% did not respond to the question</li> </ul> <p>Within the current Council Tax Support Scheme case load there are 4107 claims made by couples, of those 29 are from couples where each partner is of the same sex.</p> <p>We do not ask for details of claimants sexual orientation as part of the application process, so are unable to identify the breakdown for those who have made a single application form.</p> <p>(Source: Croydon Council Tax Support Scheme EQIA, 2023)</p>
<p>Pregnancy or Maternity</p>	<p>The Revenue Budget and Council Tax Levels 2023/24 may impact residents that are pregnant or on maternity if they are not working.</p> <p>However, additional benefits are provided for residents in this situation and therefore the proposed changes are expected to have minimal impact.</p> <p>Due regard will be taken to ensure that any proposed organisational restructure in early years support considers impact on pregnancy/maternity through a separate equality impact assessment.</p>	<p>A proposal to create Family Hubs – bringing services closer to families may provide benefit to those on maternity.</p>	<p><a href="https://www.personneltoday.com">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>We currently have 38 active Council Tax Support Scheme claims where the claimant or partner are in receipt of maternity pay which is recorded on our system.</p> <p>We do not record if someone is pregnant at the time of application.</p> <p>(Source: Croydon Council Tax Support Scheme EQIA, 2023)</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 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-andhttps://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultationengagement/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>Risk Index</b>	<b>Risk Magnitude</b>
	- 9	High
	- 5	Medium
	- 3	Low

**Key**

**Table 3 – Impact scores**

Note: The data to populate is 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:

The scores below have been taken on the basis of the Council Tax decision impacting on all residents, and therefore impacting on residents with protected characteristics. These scores are not intended to suggest that protected characteristic groups will be impacted more than others.

Column 1 PROTECTED GROUP	Column 2 LIKELIHOOD OF IMPACT SCORE	Column 3 SEVERITY OF IMPACT SCORE	Column 4 EQUALITY IMPACT SCORE
	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.  <b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b>	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.  <b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b>	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.  <b>Equality impact score = likelihood of impact score x severity of impact score.</b>
Age	3	2	6
Disability	3	2	6
Sex	3	2	6
Gender reassignment	3	2	6
Marriage / Civil Partnership	3	2	6
Race	3	2	6
Religion or belief	3	2	6
Sexual Orientation	3	2	6
Pregnancy or Maternity	3	2	6

## 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       | X | <input type="checkbox"/> |
| Eliminating unlawful discrimination, harassment and victimisation                     |   | <input type="checkbox"/> |
| Fostering good relations between people who belong to protected characteristic groups | X | <input type="checkbox"/> |

**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:



## Equality Analysis

### Mitigations

Residents currently pay Council Tax, and 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 Council Tax will impact all residents who pay, and 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. With regard to the increase in Council Tax there are four specific key mitigations:

- The council's Council Tax Support Scheme for those with a low income
- The Revenue Budget proposals include plans to introduce a new hardship fund to support residents who are not eligible for Council Tax Support but who are finding it hard to make ends meet in these difficult times.
- A dedicated hub to [help with the rising cost of living](#) has also been set up on the Council's website
- The council's ethical approach to council tax collection.

With regard to the wider increase in fees & charges 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.

- 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).

## Equality Analysis

The review of Discretionary Housing Placements may impact residents, however a lack of data regarding protected characteristics means it is not currently possible to identify any impact to groups sharing protected characteristics at this stage. Further work will be undertaken by the service to improve data collection. In terms of mitigation, every household will be given the appropriate financial support or advice to help them move into alternative private rented sector accommodation.

**In respect of specific proposals, it is likely that some proposals may result in new policy or service changes. In this instance each proposal will be accompanied by an equality analysis and / or consultation which will inform the final proposal and its implementation, on a case by case basis.**

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
Age	<ol style="list-style-type: none"> <li>1. Savings are proposed from placement costs for looked after children – specific impacts are unknown due to the long term nature of some of these proposals, and the consultations that will be required before agreeing a definitive course of action.</li> <li>2. Proposed savings may impact upon provision for 18-25 year olds with no recourse to public funds, with an All Rights Exhausted immigration status.</li> <li>3. Savings are proposed through the removal of Non-Contractual Overtime (NCO) – there is a</li> </ol>	<ol style="list-style-type: none"> <li>1. The Council will continue to meet needs and statutory duties, and the gatekeeping of such services will be governed by policy and procedures that ensure fair treatment of protected groups</li> <li>2. Human rights assessments ensure that young people are supported in the appropriate pathways, provision of accommodation subsistence is provided appropriately to those in need.</li> <li>3. This will be mitigated in appropriate planning, reviews and consultation. Risks and issues associated with this will be</li> </ol>	<ol style="list-style-type: none"> <li>1. Debbie Jones</li> <li>2. Sherry Coppin</li> <li>3. Dean Shoemith</li> </ol>	<ol style="list-style-type: none"> <li>1. Proposal specific EQIAs from 28/02/23</li> <li>2. Proposal specific EQIA due 30/04/23</li> <li>3. TBC</li> </ol>

## Equality Analysis

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
	possibility that NCO is largely undertaken by certain roles within the council which may impact some groups more than others. For example, NCO is less common in senior roles. Therefore this may have a negative impact on some of our junior colleagues, who – on average – are younger.	managed within the appropriate project resource.		
Disability	<ol style="list-style-type: none"> <li>1. The closure of the Cherry Hub garden centre and Whitehorse centre services is likely to have a negative impact on people with a learning disability.</li> <li>2. Council Tax Scheme Where a claimant or partner are disabled and not working a deduction may be introduced for any other adult living in the property For Disabled claims where the claimant or partner are working they may be impacted, along with all other working age claims depending on the outcome in relation to the proposal to change</li> </ol>	<ol style="list-style-type: none"> <li>1. The mitigation for affected users and their cares will be offered through consultation to re assess their needs ensure that the remaining two services are able to meet their needs or whether an alternative service needs to be commissioned and through the exploration of alternative service which service users could be signposted to.</li> <li>2. Council Tax Scheme Proposal is to exclude any non-dependents who are receiving carers allowance for the claimant or partner</li> </ol>	<ol style="list-style-type: none"> <li>1. Annette McPartland</li> <li>2. Jane West</li> </ol>	<ol style="list-style-type: none"> <li>1. Proposal specific EQIA due end of Feb 2023</li> <li>2. April 2023</li> </ol>

## Equality Analysis

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
	the rate by which the income bands are increased.	A hardship fund is available for those affected by the changes to support with the reduction in support		
Sex	<p>1. Council Tax</p> <p>Of the 16,260 single claims by females, 11,795 are from working age claimants and of the 6,263 male claims 4,187 are working age. These claimants may be affected by the change to the amount the income bands will be increased depending on the final decision reached by Council.</p>	<p>1. Council Tax</p> <p>A hardship fund is available for those affected by the changes to support with any reduction in benefit. It will help to provide transitional support to bridge the gap between residents old and new entitlement.</p>	N/A	N/A
Gender reassignment / identity	N/A	N/A	N/A	N/A
Marriage / Civil Partnership	N/A	N/A	N/A	N/A
Sexual orientation	N/A	N/A	N/A	N/A
Race	1. The proposal to reduce Non-Contractual Overtime (NCO) may impact officers sharing this	1. This will be mitigated in appropriate planning, reviews and consultation. Risks and issues	1. Dean Shoemith	1. TBC

## Equality Analysis

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
	<p>protected characteristic as there is a possibility that NCO is largely undertaken by certain roles within the council which may impact some groups more than others. For example, workforce data shows that our workforce is less diverse in more senior roles. NCO is less common in senior roles. Therefore this may have a negative impact on Global Majority officers</p> <p>2. Council Tax: Residents who identify as Black are the largest group in receipt of Council Tax support (although nearly half of recipients have not declared).</p> <p>3. Housing Benefit Review The risk that the resident or landlord does not meet the criteria and that they can no longer stay in the property is more likely to affect Black African and Black Caribbean claimants as they make up the</p>	<p>associated with this will be managed within the appropriate project resource.</p> <p>2. Council Tax Scheme A hardship fund is available for those effected by the changes to support with the reduction in benefit. It will help to provide transitional support to bridge the gap between residents old and new entitlement.</p> <p>3. Housing Benefit Review We will work with providers to support them to get up to standard and maintain their supported accommodation classification. We have sign off to recruit to a new team</p>		

## Equality Analysis

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
	largest percentage of the caseload (excluding the unknown category)	who will be solely focused on these claims and will be able to work with providers. If we can't classify a provider as supported, or a tenant is deemed to no longer require this accommodation we will work with Housing to look for alternative accommodation and the tenant will be able to claim universal credit to support with their housing costs.		
Religion or belief	N/A	N/A	N/A	N/A
Pregnancy or maternity	N/A	N/A	N/A	N/A

## Equality Analysis

**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.		
<b>Decision</b>	<b>Definition</b>	<b>Conclusion - Mark 'X' below</b>
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	<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> <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> <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>	X

## Equality Analysis

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? MAB / Cabinet		Meeting title: Cabinet and Council Date: Cabinet: 22 February; Council: 1 March

### 7. Sign-Off

<b>Officers that must approve this decision</b>	
<b>Equalities Lead</b>	<b>Name: Gavin Handford</b> <b>Date: 15 Feb 2023</b> <b>Position: Director of Policy, Programmes &amp; Performance</b>
<b>Corporate Director</b>	<b>Name: Jane West</b> <b>Date: 20 February 2023</b> <b>Position: Corporate Director of Resources</b>



## Appendix: Deprivation data

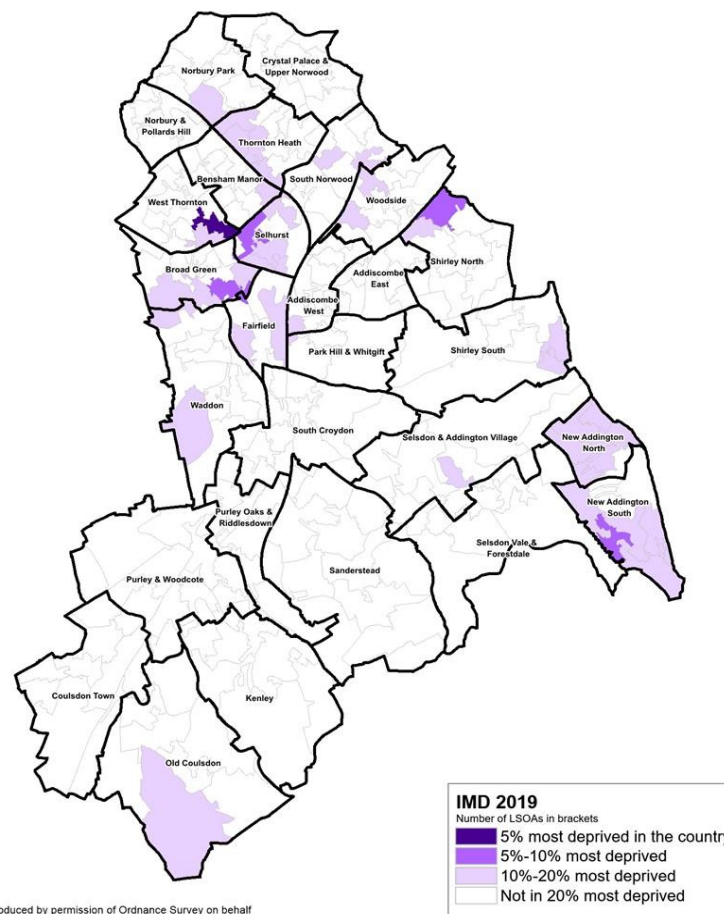
### INFOGRAPHIC 1

In Croydon, 1567 people live amongst the 5% most deprived in the country (Dark Blue)

In this area,

50% are male	(Croydon 49%)
27% are 0-15	(Croydon 22%)
30% are White ethnic group	(Croydon 55%)
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%)

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



## Equality Analysis

### Appendix: Croydon Council staff data

Ethnicity							
Directorate	Any other	Asian Group	Black Group	Mixed Group	Undisclosed	White Group	Grand Total
Adult Social	0.36%	1.37%	4.95%	0.74%	2.67%	2.23%	12.31%
Assistant	0.33%	1.88%	3.35%	0.58%	2.82%	3.10%	12.06%
Children	0.61%	3.48%	8.71%	1.85%	5.94%	7.62%	28.21%
Housing	0.10%	1.37%	3.55%	0.69%	2.97%	2.13%	10.81%
Resources	0.13%	1.22%	1.80%	0.46%	1.40%	1.27%	6.27%
Sustainable	0.84%	5.92%	5.76%	1.68%	6.80%	9.34%	30.34%
<b>Grand Total</b>	<b>2.36%</b>	<b>15.23%</b>	<b>28.13%</b>	<b>5.99%</b>	<b>22.59%</b>	<b>25.69%</b>	<b>100.00%</b>

Sex					
Directorate	Female	Male	Undisclosed	Prefer to self-describe	Grand Total
Adult Social	7.39%	2.59%	2.34%	0.00%	12.31%
Assistant	6.25%	3.58%	2.23%	0.00%	12.06%
Children	17.39%	5.74%	5.03%	0.05%	28.21%
Housing	4.72%	3.63%	2.44%	0.03%	10.81%
Resources	2.77%	2.28%	1.19%	0.03%	6.27%
Sustainable	14.24%	9.93%	5.94%	0.23%	30.34%
<b>Grand Total</b>	<b>52.75%</b>	<b>27.75%</b>	<b>19.17%</b>	<b>0.33%</b>	<b>100.00%</b>

Disability				
Directorate	No	Yes	Undisclosed	Grand Total
Adult Social	10.26%	1.09%	0.96%	12.31%
Assistant	9.98%	0.84%	1.24%	12.06%
Children	23.48%	1.90%	2.82%	28.21%
Housing	9.06%	0.58%	1.17%	10.81%
Resources	5.23%	0.46%	0.58%	6.27%
Sustainable	24.75%	2.36%	3.22%	30.34%
<b>Grand Total</b>	<b>82.76%</b>	<b>7.24%</b>	<b>10.00%</b>	<b>100.00%</b>

## Equality Analysis

Sexual Orientation							
Directorate	Bi-sexual	Gay man	Hetrosexual /straight	Lesbian/gay woman	Other	Undisclosed	Grand Total
Adult Social	0.20%	0.15%	8.89%	0.00%	0.08%	3.00%	12.31%
Assistant	0.20%	0.10%	8.66%	0.15%	0.05%	2.89%	12.06%
Children	0.71%	0.38%	20.31%	0.33%	0.18%	6.30%	28.21%
Housing	0.20%	0.20%	7.51%	0.03%	0.03%	2.84%	10.81%
Resources	0.10%	0.05%	4.52%	0.03%	0.08%	1.50%	6.27%
Sustainable	0.84%	0.74%	19.98%	0.33%	0.38%	8.07%	30.34%
<b>Grand Total</b>	<b>2.26%</b>	<b>1.62%</b>	<b>69.87%</b>	<b>0.86%</b>	<b>0.79%</b>	<b>24.60%</b>	<b>100.00%</b>

Age Range													
Directorate	20 or	21-25	26-30	31-35	36-40	41-45	46-50	51-55	56-60	61 or older	Undisclosed	Grand Total	
Adult Social	0.18%	1.35%	1.35%	1.17%	1.17%	1.27%	1.07%	1.12%	0.69%	0.28%	2.69%	12.31%	
Assistant	0.36%	1.85%	1.83%	1.29%	0.84%	1.04%	0.81%	0.74%	0.53%	0.18%	2.59%	12.06%	
Children	0.33%	3.94%	4.95%	3.76%	2.77%	2.16%	1.90%	1.52%	0.58%	0.48%	5.81%	28.21%	
Housing	0.18%	1.55%	1.83%	1.62%	1.27%	0.71%	0.30%	0.43%	0.20%	0.05%	2.67%	10.81%	
Resources	0.08%	1.09%	1.02%	0.53%	0.74%	0.48%	0.33%	0.30%	0.23%	0.13%	1.35%	6.27%	
Sustainable	1.14%	4.57%	4.01%	3.35%	2.59%	2.21%	2.13%	1.88%	1.37%	0.58%	6.50%	30.34%	
<b>Grand Total</b>	<b>2.26%</b>	<b>14.34%</b>	<b>14.98%</b>	<b>11.73%</b>	<b>9.37%</b>	<b>7.87%</b>	<b>6.55%</b>	<b>5.99%</b>	<b>3.60%</b>	<b>1.70%</b>	<b>21.60%</b>	<b>100.00%</b>	