

# **Equality Analysis Form**

## 1. Introduction

### 1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

## 2. Proposed change

|   |   |
|---|---|
| <b>Directorate</b>                                    | <b>Sustainable Communities, Regeneration &amp; Economic Recovery Department</b> |
| <b>Title of proposed change</b>                       | <b>Tackling Violence Against Women and Girls Delivery plan</b>                  |
| <b>Name of Officer carrying out Equality Analysis</b> | <b>Alison Kennedy</b>   |

## 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 Tackling Violence Against Women and Girls (VAWG) delivery plan is a new proposal and replaces the Domestic Abuse Strategy. The plan sets out Croydon Council's approach to VAWG and its duties set out within the Domestic Abuse Act 2021.

Violence Against Women and Girls (VAWG) is defined as:

“Any act of gender – based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life

VAWG is a cause and effect of inequality and impacts negatively on all the protective characteristics of the Equality Act, 2010. VAWG brings together multiple forms of serious violence under a single policy strand.

- Crimes committed in the name of “honour”
- Domestic Abuse
- Female genital mutilation (FGM)
- Forced Marriage
- Sexual Violence, abuse, exploitation and rape
- Stalking • Harassment
- Trafficking for sexual exploitation

The VAWG delivery plan has been developed with input from survivors and professionals gathered through consultations as well as the knowledge acquired over the past four years. The Partnership will translate this understanding into positive action and provide support to some of the most vulnerable individuals in Croydon.

## 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>VAWG affects people of all age groups including unborn children who are also at risk of harm, through acts of abuse directed at their mothers.</p> <p>The impact on children and young people is acknowledged in the delivery plan.</p> <p>Available data shows that the majority of victim/survivors in receipt of services are primarily for domestic abuse with victim/survivors being aged 16 and above (in line with the Home Office definition)</p> | N/A             | <p>MetStats (statistical system owned by the Metropolitan Police)</p> <p>Data held by FJS (Croydon Council)</p> <p>Home Office data</p> <p>ONS data</p> |
| Disability                        | <p>National research highlights that people with long term illness and disabled women are at a higher risk of victimisation than people without. This is referenced within the VAWG delivery plan.</p> <p>Data from Croydon MARAC (Multi Agency Risk Assessment Conference ) for high risk victims of domestic abuse highlights that</p>   | N/A             |   |

|                               |   |     |  |
|-------------------------------|---|-----|--|
|                               | <p>from April 2023 – March 2024 277 (30%) of victim/survivors with disabilities were referred into Croydon MARAC.</p> <p>There is further evidence that the impact of VAWG and trauma on children affects children’s wellbeing significantly.</p> <p>Findings from Domestic Homicide Reviews highlights that there is a correlation between Domestic Abuse, Substance Abuse and Mental Health in relation to perpetrators of these homicides</p>  | N/A |  |
| Sex                           | Both men and women can be victims and/or perpetrators of VAWG. However, it is the disproportionate number of women whom are victims that impact on gender inequality and is the reason the majority of our response must reflect needs for services for the impact of violence on women and girls due to gender inequality.   | N/A |  |
| Gender Reassignment           | There is no available evidence on gender reassignment and VAWG  | N/A |  |
| Marriage or Civil Partnership | <p>VAWG services seek to support all people regardless of marital status. However for some victim/survivors marriage is synonymous with abuse specifically Forced marriage where the victim/survivor is often subjected to sexual violence and culturally pressured to remain in the relationship by extended family members</p> <p>Research informs us that individuals, particularly women, living in couples (married or cohabiting) or who have decided to separate from their partners are more likely to be a victims of domestic abuse.</p> <p>Relationship breakdown is identified as a significant indicator of risk in homicide reviews</p> | N/A |  |
| Religion or belief            | Research informs us that individuals with particular religious beliefs are more likely to be victims of certain forms of hate crime. However, there is a strong correlation between some forms of gender violence with a belief in `so called honor-based violence, spirit possession and harmful practices such as female genital mutilation and breast ironing.   | N/A |  |

|                        |  |  |  |
|------------------------|--|--|--|
| Race                   | <p>Croydon is a diverse borough with 48.4% of the population identifying as a white ethnicity group, with 36.4% of the population identifying as Global Majority</p> <p>Some forms of gender based violence affect specific communities within Global Majority more significantly, this includes Honour Based Violence, Female Genital Mutilation and Forced Marriage. Although, some traditional practices are often associated within Global Majority communities, It is important to understand that forced marriage and honour based violence also occurs within traveler communities.</p> |  |  |
| Sexual Orientation     | <p>From April 2023 – March 2024, data from the FJS identified that 95.78 % victim/survivors were female and 4.11% were male and less than 1% identified as inter or non-binary. In terms of perpetrators 92.09 % were male and 7.41 % were female with 0% transgender.</p>   |  |  |
| Pregnancy or Maternity | <p>This is a high-risk group in relation to domestic abuse with pregnancy and maternity being a significant risk factor for victimisation. There is an ongoing need for capacity in maternity and both pre and post-natal services to identify risks and refer appropriately to relevant support services. The Home Office have suggested that 70% of teenage mothers are in a violent relationship</p>  |  |  |

**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   |
|---|---|-----------------------|
| Tackling Violence Against Women and Girls (VAWG) Delivery Plan” in Croydon was developed with input from survivors and professionals gathered through consultations as well as the knowledge acquired over the past four years. The Partnership will translate this understanding into positive action and provide support to some of the most vulnerable individuals in Croydon. The Delivery Action Plan is a response to the need for coordinated efforts to address VAWG, as evidenced by the Community Safety Strategy 2022-2024. The Tackling Violence against Women and Girls Delivery Plan is also informed by a strategic needs assessment on VAWG in the borough, which is aimed at reducing violence against women and girls | <p><b>Strategic Needs assessment.</b></p> <p><b>Independent consultants report.</b></p> | <p><b>5 years</b></p> |
|   |   |                       |

If 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**

|                           |   |   |   |   |
|---------------------------|---|---|---|---|
| <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            |

## Equality Analysis

Table 3 – Impact scores

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

# Equality Analysis

## 4. Statutory duties

### 4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups How?

**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   | N/A             |                      |              |                     |
| Race   | N/A             |                      |              |                     |
| Sex (gender)   | N/A             |                      |              |                     |
| Gender reassignment  | N/A             |                      |              |                     |
| Sexual orientation   | N/A             |                      |              |                     |

## Equality Analysis

|                            |     |  |  |  |
|----------------------------|-----|--|--|--|
| Age                        | N/A |  |  |  |
| Religion or belief         | N/A |  |  |  |
| Pregnancy or maternity     | N/A |  |  |  |
| Marriage/civil partnership | N/A |  |  |  |

### 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  | <p>Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</b></p> <p>This delivery plan will actively work to address inequality in Croydon – it is a stated goal and intended consequence of the work. It recognizes existing inequality and aims to improve in all those areas. It has a specific goal around tackling violence against women and girls with intended partnership working with both statutory partners and Community relations which directly links to the long-standing inequality suffered by women and girls in terms of domestic abuse, sexual violence, stalking and street based harassment which will directly improve inequality in the borough.</p> | X                           |
| Adjust the proposed change   | <p>We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b></p>   |                             |
| Continue the proposed change   | <p>We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. <b>If you reach this conclusion, you should clearly</b></p>   |                             |

## Equality Analysis

|   |  |  |
|---|--|--|
|   | <b>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.<br>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: June Cabinet 2024   |  |

### 7. Sign-Off

|   |  |                         |
|---|--|-------------------------|
| <b>Officers that must approve this decision</b> |  |                         |
| <b>Equalities Lead</b>                          | <b>Name: Ken Orlukwu</b>                   | <b>Date: 30/04/2024</b> |
|   | <b>Position: Senior Equalities Officer</b> |                         |
| <b>Director</b>                                 | <b>Name:</b>                               | <b>Date:</b>            |
|   | <b>Position:</b>                           |                         |