

Croydon Council Equality Analysis Form

Stage 1 Initial Risk Assessment - Decide whether a full equality analysis is needed

At this stage, you will review existing information such as national or local research, surveys, feedback from customers, monitoring information and also use the local knowledge that you, your team and staff delivering a service have to identify if the proposed change could affect service users from equality groups that share a “protected characteristic” differently. You will also need to assess if the proposed change will have a broader impact in relation to promoting social inclusion, community cohesion and integration and opportunities to deliver “social value”.

Please note that the term ‘change’ is used here as shorthand for what requires an equality analysis. In practice, the term “change” needs to be understood broadly to embrace the following:

- Policies, strategies and plans
- Projects and programmes
- Commissioning (including re-commissioning and de-commissioning)
- Service Review
- Budgets
- Staff structures (including outsourcing)
- Business transformation programmes
- Organisational change programmes
- Processes (for example thresholds, eligibility, entitlements, and access criteria)

You will also have to consider whether the proposed change will promote equality of opportunity; eliminate discrimination or foster good relations between different groups or lead to inequality and disadvantage. These are the requirements that are set out in the Equality Act 2010.

1.1 Analysing the proposed change

1.1.1 What is the name of the change?

Purley District Centre Prosperity - Purley Business Improvement District

1.1.2 Why are you carrying out this change?

Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

The Purley BID is led by Purley Business Association who has set-up a BID board with Council and Local Councillors representatives. By working together we aim to drive economic growth in this key, ambitious and growing district centre.

This will be achieved through responding to the opportunities presented by a successful Business Improvement District (BID) ballot; working with the private sector, and by using our powers, activity and resources to support local businesses, jobs and housing growth.

This activity supports a number of Council priorities for the borough namely in jobs and economy:

1. We will work to improve development opportunities and investment in Croydon
2. We will encourage businesses to invest in our district centres and to employ local people and we will use business rates to help achieve this
3. We will take steps to encourage owners of empty offices to bring the buildings back into productive use
4. We will support and encourage co-operative solutions to the Croydon economy

This activity supports the councils Equality and Inclusion Policy strategic priority listed below:

1. Make Croydon a place of opportunity and fairness by tackling inequality, disadvantage and exclusion and in particular:

“Work in partnership to lift people out of poverty by increasing employment opportunities across the borough ensuring local people have a pathway into employment, education and training”

1.1.3 What stage is your change at now?

See Appendix 1 for the main stages at which equality analyses needs to be started or updated. In many instances, an equality assessment will be started when a report is being written for Cabinet or Committee. If that report recommends that a proposed change takes place, the same equality assessment can be updated to track equality impacts as it progresses.

Equality assessment started alongside report being written for Cabinet.

Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected by the change and how

1.2.1 Who are your internal and external stakeholders?

For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

BIDs are areas within which projects specified in the BID proposals are to be carried out for the benefit of that district or those who live, work or carry on any activity in the district. Key stakeholder is non-domestic ratepayers, or hereditaments in the district that finance the projects (in whole or in part) by a BID levy.

1.2.2 What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?

A successful 'yes' vote at BID ballot has the potential to unlock levy income of around £165,556 per annum over a five year term, to support interventions supported by levy payers and public.

The BID business plan ('the BID proposal') includes a range of new or expanded services and works over and above those provided by the local authority. The core focus is a programme of additionality, complementing those services provided within the area by the local authority and other statutory services.

Typical projects includes anti-crime and community security measures; higher levels of street cleaning; marketing initiatives; business development events; environmental improvements; training & networking services; and business support services. Typical key themes within a BID proposal are a strong business voice; safe and secure; clean and attractive; perception and image and accessibility. A BID has the potential to bring significant extra regeneration impact to a town or district centre.

The benefits to the Council of supporting the BID proposal are:

- Contribute towards our key priority for the Council to ensure that Croydon all residents benefit from economic growth in the borough and have the opportunities to develop new or to expand existing local businesses, as well as, skills and qualifications to access decently paid jobs
- Long term savings of a dedicated resource to act as a link to the district centre
- A focus on economic regeneration within the district
- Deliver additionality against the Council's priorities of crime and disorder & environmental improvements and sustainability
- Better community cohesion from the events schedule planned by the BID to encourage footfall.

1.2.3 Does your proposed change relate to a service area where there are known or potential equalities issues?

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response
If you don't know, you may be able to find more information on the Croydon Observatory (<http://www.croydonobservatory.org/>)

The proposed change relates to a service area where there are known or potential equalities issues in relation to economic inequality - unemployment for example affects some protected groups more than others such as age, race and ethnicity.

1.2.4 Does your proposed change relate to a service area where there are already local or national equality indicators?

You can find out from the Equality Strategy (<http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf>). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

The proposed change relates to a service area where there are already local or national equality indicators. This activity supports the councils Equality and Inclusion Policy strategic priority listed below:

- Make Croydon a place of opportunity and fairness by tackling inequality, disadvantage and exclusion and in particular:

“Work in partnership to lift people out of poverty by increasing employment opportunities across the borough ensuring local people have a pathway into employment, education and training”

1.2.5	Analyse and identify the likely <u>advantage</u> or <u>disadvantage</u> associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a “protected characteristic”
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Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	<ul style="list-style-type: none"> • Croydon residents benefit from economic growth in the BID area • A focus on economic regeneration within the district – increase footfall/trade for all traders • Additionality against priorities of crime, disorder, environmental improvements and sustainability • Better community cohesion from the events schedule planned by the BID to encourage footfall. 	There are no negative equalities impacts expected from this decision.
Race/ Ethnicity	<ul style="list-style-type: none"> • Croydon residents benefit from economic growth in the BID area • A focus on economic regeneration within the district – increase footfall/trade for all traders • Additionality against priorities of crime, disorder, environmental improvements and sustainability • Better community cohesion from the events schedule planned by the BID to encourage footfall. 	There are no negative equalities impacts expected from this decision.
Gender	<ul style="list-style-type: none"> • Croydon residents benefit from economic growth in the BID area • A focus on economic regeneration within the district – increase footfall/trade for all traders • Additionality against priorities of crime, disorder, environmental improvements and sustainability • Better community cohesion from the events schedule 	There are no negative equalities impacts expected from this decision.

	planned by the BID to encourage footfall.	
Transgender	<ul style="list-style-type: none"> • Croydon residents benefit from economic growth in the BID area • A focus on economic regeneration within the district – increase footfall/trade for all traders • Additionality against priorities of crime, disorder, environmental improvements and sustainability • Better community cohesion from the events schedule planned by the BID to encourage footfall. 	There are no negative equalities impacts expected from this decision.
Age	<ul style="list-style-type: none"> • Croydon residents benefit from economic growth in the BID area. • A focus on economic regeneration within the district – increase footfall/trade for all traders • Additionality against priorities of crime, disorder, environmental improvements and sustainability • Better community cohesion from the events schedule planned by the BID to encourage footfall. 	There are no negative equalities impacts expected from this decision.
Religion /Belief	<ul style="list-style-type: none"> • Croydon residents benefit from economic growth in the BID area • A focus on economic regeneration within the district – increase footfall/trade for all traders • Additionality against priorities of crime, disorder, environmental improvements and sustainability • Better community cohesion from the events schedule planned by the BID to encourage footfall. 	There are no negative equalities impacts expected from this decision.
Sexual Orientation	<ul style="list-style-type: none"> • Croydon residents benefit from economic growth in the BID area • A focus on economic 	There are no negative equalities impacts expected from this decision.

	<p>regeneration within the district – increase footfall/trade for all traders</p> <ul style="list-style-type: none"> • Additionality against priorities of crime, disorder, environmental improvements and sustainability • Better community cohesion from the events schedule planned by the BID to encourage footfall. 	
Social inclusion issues	This activity will contribute towards creating jobs for local people.	There are no negative equalities impacts expected from this decision.
Community Cohesion Issues	Better community cohesion from the consultation and events schedule planned by the BID to encourage footfall and be their business voice.	There are no negative equalities impacts expected from this decision.
Delivering Social Value	<p>The activity supports a number of Council priorities for the borough namely in jobs and economy.</p> <ul style="list-style-type: none"> • We will work to improve development opportunities and investment in Croydon • We will encourage businesses to invest in our district centres and to employ local people and we will use business rates to help achieve this • We will take steps to encourage owners of empty offices to bring the buildings back into productive use • We will support and encourage co-operative solutions to the Croydon economy 	There are no negative equalities impacts expected from this decision.

1.2.6	<p>In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?</p> <p>For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation</p>
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No. The Purley BID is led by Purley Business Association who has set-up a board with Council and Local Councillors representatives. By working together it is expected that all equalities and inclusions outcomes that need to be considered will be addressed from ballot implementation through to delivery of proposals over the duration of the BID.

1.2.7	<p>Would your proposed change affect any protected groups more significantly than non-protected groups?</p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....</p>
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No. The Purley BID is led by Purley Business Association who has set-up a board with Council and Local Councillors representatives. By working together it is expected that all equalities and inclusions outcomes that need to be considered will be addressed from ballot implementation through to delivery of proposals over the duration of the BID.

1.2.8	<p>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?</p> <p><i>In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes etc.</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>
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The proposed change is likely to help the Council in advancing equality of opportunity. Croydon residents will benefit from economic growth in the BID area.

A focus on economic regeneration within the district – increase footfall/trade for all traders; and additionality against priorities of sustainability, e.g. Business engagement proposals such as engaging landlords and agents to improve property occupancy and understanding how Purley can attract appropriate new tenants to add retail diversity and widen available services and shops. As well as, proposals of improved accessibility - To work with the Council to consider options for improving the availability of parking for shoppers and visitors to the town centre both in the short-term and long-term. Use of online service to support visitors' accessibility. Consider options for improving signage in the town, particularly to the parking areas, to enhance parking compliance and the visitors' experience.

1.2.9	<p>As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?</p> <p><i>In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.</p>
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The proposed change is likely to help the Council in eliminating unlawful discrimination, harassment and victimisation in relations to protected groups.

A focus on economic regeneration within the district and additionality against priorities of crime and disorder, e.g. safer streets proposals such as joining or creating a Business Crime Reduction Partnership Scheme to track antisocial behavior across the town, hand in hand with Croydon and neighbouring areas. Consider options for car park lighting in the multi-Storey where the improved lighting could be of benefit to the public. Pub watch, and Retail security, to help prevent trouble around shops, pubs and dining. Improved surveillance and communication channels between local businesses; and acquire additional policing.

1.2.10 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?

In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

The proposed change is likely to help the Council in fostering good relations between people who belong to any protected groups and those who do not.

A focus on economic regeneration within the district, additionality against priorities of sustainability through business engagement and better community cohesion from the events schedule planned by the BID to encourage footfall.

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	<p>Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report used in decision making, such as a Cabinet report</p>	<p>There are no negative equalities impacts expected from this decision. This decision aims to provide additionality to Council's existing services through</p>

Decision	Guidance	Response
		consultation with public and businesses in the BID area to shape proposals. This initiative is led by an independent organisation, Purley BID, with representative from Council and Local Councillors.
Yes, further equality analysis is required	<p>Please state why and outline the information that you used to make this decision. Also indicate</p> <ul style="list-style-type: none"> • When you expect to start your full equality analysis • The deadline by which it needs to be completed (for example, the date of submission to Cabinet) • Where and when you expect to publish this analysis (for example, on the council website). <p>You must include this statement in any report used in decision making, such as a Cabinet report.</p>	
Officers that must approve this decision	Name and position	Date
Report author		
Director		

1.4 Feedback on Equality Analysis (Stage 1)

Please seek feedback from the corporate equality and inclusion team and your departmental lead for equality (the Strategy and Planning Manager / Officer)

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Name of Officer		
Date received by Officer		Please send an acknowledgement
Should a full equality analysis be carried out?		Note the reasons for your decision

Stage 2 Use of evidence and consultation to identify and analyse the impact of the change

Use of data, research and consultation to identify and analyse the probable Impact of the proposed change

This stage focuses on the use of existing data, research, consultation, satisfaction surveys and monitoring data to predict the likely impact of proposed change on customers from diverse communities or groups that may share a protected characteristic.

Please see Appendix 2 (section 2) for further information.

2.1 Please list the documents that you have considered as a part of the equality analysis review to enable a reasonable assessment of the impact to be made and summarise the key findings.

This section should include consultation data and desk top research (both local and national quantitative and qualitative data) and a summary of the key findings.

Qualitative data from Purley Business Association feedback from public consultation and business engagements, i.e. No equality and inclusion issues were raised from the public consultation and business engagements.

Known quantitative data on hereditaments in the BID area.

2.2 Please complete the table below to describe what the analysis, consultation, data collection and research that you have conducted indicates about the probable impact on customers or staff from various groups that share a protected characteristic.

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
All	As outlined in section 1.2..5	As outlined in section 1.2..5	As outlined in section 2.1.

2.3 Are there any gaps in information or evidence missing in the consultation, data collection or research that you currently have on the impact of the proposed change on different groups or communities that share a protected characteristic? If so, how

will you address this?

Please read the corporate public consultation guidelines before you begin:

<http://intranet.croydon.net/finance/customerservices/customerserviceprogramme/stepbystepguide.asp>.

No identified gaps, however, Purley BID Board will continue to monitor the impact of proposals for benefit of all residents and businesses in the Purley BID area.

2.4 If you really cannot gather any useful information in time, then note its absence as a potential disadvantageous impact and describe the action you will take to gather it.

Please complete the table below to set out how will you gather the missing evidence and make an informed decision. Insert new rows as required

Group's with a "Protected characteristic" and broader community issues	Missing information and description of potential disadvantageous impact	Proposed action to gather information
As per section 2.3.	As per section 2.3.	As per section 2.3.

Stage 3 Improvement plan

Actions to address any potential disadvantageous impact related to the proposed change

This stage focuses on describing in more detail the likely disadvantageous impact of the proposed change for specific groups that may share a protected characteristic and how you intend to address the probable risks that you have identified stages 1 and 2.

3.1 Please use the section below to define the steps you will take to minimise or mitigate any likely adverse impact of the proposed change on specific groups that may share a protected characteristic.

Equality Group (Protected Characteristic)	Potential disadvantage or negative impact e	Action required to address issue or minimise adverse impact	Action Owner	Date for completing action
As per section 2.3	As per section 2.3	As per section 2.3	Purley BID Board	Ongoing through duration of the BID

3.2	How will you ensure that the above actions are integrated into relevant annual department or team service plans and the improvements are monitored?
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As per section 2.3. – Council representative on Purley BID Board.

3.3	How will you share information on the findings of the equality analysis with customers, staff and other stakeholders?
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As per section 2.3. – Council representative on Purley BID Board.

Section 4 Decision on the proposed change

4.1	Based on the information in sections 1-3 of the equality analysis, what decision are you going to take?
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Decision	Definition	Yes / No
We will not make any major amendments to the proposed change because it already includes all appropriate actions.	Our assessment shows that there is no potential for discrimination, harassment or victimisation and that our proposed change already includes all appropriate actions to advance equality and foster good relations between groups.	Yes
We will adjust the proposed change.	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change. We are going to take action to make sure these opportunities are realised.	
We will continue with the proposed change as planned because it will be within the law.	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed 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.	
We will stop the proposed change.	The proposed change would have adverse effects on one or more protected groups that are not justified and cannot be lessened. It would lead to unlawful discrimination and must not go ahead.	

4.2 Does this equality analysis have to be considered at a scheduled meeting?
If so, please give the name and date of the meeting.

No. Purley BID Board will continue to monitor the impact of proposals for benefit of all residents and businesses in the Purley BID area and update the equalities analysis periodically.

4.3 When and where will this equality analysis be published?
An equality analysis should be published alongside the policy or decision it is part of.
As well as this, the equality assessment could be made available externally at various points of delivering the change. This will often mean publishing your equality analysis before the change is finalised, thereby enabling people to engage with you on your findings.

This is a Key Decision as defined in the Council's Constitution. The decision and September 2015 cabinet papers may follow appropriate procedures for publication, unless the decision is referred to the Scrutiny & Strategic Overview Committee by the requisite number of Councillors.

4.4 When will you update this equality analysis?
Please state at what stage of your proposed change you will do this and when you expect this update to take place. If you are not planning to update this analysis, say why not

Purley BID Board will continue to monitor the impact of proposals for benefit of all residents and businesses in the Purley BID area and update the equalities analysis periodically.

4.5 Please seek formal sign of the decision from Director for this equality analysis?
This confirms that the information in sections 1-4 of the equality analysis is accurate, Comprehensive and up-o-date.

Officers that must approve this decision	Name and position	Date
Head of Service / Lead on equality analysis	Karen Fiagbe, Economic Delivery Manager	2.9.15
Director	Stephen Tate, Director – District Centres & Regeneration	2.9.15

Email this completed form to equalityandinclusion@croydon.gov.uk, together with an email trail showing that the director is satisfied with it.