

# 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?

0 – 65 Disability Framework

#### 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 0 - 65 Disability Framework is being developed to focus on identifying needs and ensuring clear pathways from birth to 65 for children with Special Educational Needs and Disabilities (SEND) and adults with disabilities and their families. The Framework is intended as a driver for co-produced service development and improvement working with partners and clients and will include principles, pathways and priorities for change. These will inform any future work on commissioning and service restructures that develop independently of this Framework.

The Framework is embedded within the Independence strand of Ambitious for Croydon and the Independence Strategy. As such service users will be encouraged and supported to take responsibility for managing their lives and gaining resilience. They will have access to high quality information and advice and early interventions to reduce crisis management and maximise independence. The Framework will enable Croydon to be more inclusive of disability in all aspects of our services such as planning, transport, housing and the local environment.

**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.

The draft Framework will be presented to Cabinet on 20 October 2015. The Framework has been developed from co-production workshops with staff and other stakeholders. The current draft will be presented to Cabinet Members as part of wider consultation on the direction of travel for services over the next five years. As such it is not a finished work and further consultation will be undertaken before it is completed.

**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.

The key stakeholders are:

- Users of disability services such as parents, carers, families and individuals with a disability
- Health partners and commissioners
- Service providers
- Community groups and disability organisations
- Croydon council officers working in adult social care, children's social care and the Special Educational Needs and Disabilities team

The principles, pathways and priorities for change have been developed through stakeholder workshops. However they need to be tested with a wider range of stakeholders to ensure that the principles, pathways and priorities for change are relevant and based on meeting outcomes across age ranges and needs. The Framework will then be used to inform future plans that will affect the staff who deliver services and service users. This change is seen as positive.

**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?**

The Framework will guide services towards ensuring that we continue to protect vulnerable people and their families – working with them to understand their needs and involving them in shaping services. At the same time service users will be encouraged and supported to take responsibility for managing their lives and gaining resilience. There will be an expectation that service users will have access to high quality information and advice and early interventions to reduce crisis management and maximise independence. Based on fundamental principles such as clear and fair access to services and giving people control of their lives, the Framework will be a driver for positive change based on the requirements of the Care Act 2014 and the Children and Families Act 2014. It will influence for the better the way in which services are commissioned and delivered to meet identified needs and outcomes. The priorities for change will be based around universal, targeted and specialist levels of provision so that people from a range of ages and needs can be signposted to appropriate services.

**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/>)

**Yes.** People with disability can face exclusion from the labour market which impacts on their potential to live independently. The Croydon Observatory shows that 17% of the working age population in Croydon (aged 16 – 64) have a disability, with 4.6% claiming Disability Living Allowance. Under half (48.3%) of people with a disability state that they are in employment.

Children with SEND have lower education attainment levels than their peers – this impacts on their future employment prospects and the potential to live independently as an adult. Around 20% of young people in the Youth Justice system have a SEND – the Communication Trust has estimated that 60% have speech, language and communication needs.

The Framework has been written to meet specific outcomes - including:

- Employment
- Living an independent life
- Progress at school
- Friends, relationships, being part of the community.

One of the proposed uses of the Framework will be to shape services to meet these outcomes and reduce inequality.

**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

Yes.

The AAD Framework will be used to shape services so that they meet the specific service needs of customers. This will enable the Council to deliver the following outcomes and reduce inequality:

- **To achieve better learning outcomes for children and young people by narrowing the attainment gap for those who are vulnerable**

- Attainment gap between vulnerable groups achieving 5 A –C GCSE at key stage (KS) 2 and the wider population of the borough
- Attainment gap for children with special educational needs as compared with the wider population of the borough
- **To improve economic outcomes for young people and adults by increasing opportunities to be in education, employment or training**
  - Young people not in education, employment or training especially among those aged 16 - 24, young parents, disabled people, children looked after in care, and those with Special Educational needs (SEN)
- **To improve support for vulnerable people by making it easier for them to have more choice and control over their lives**
  - Vulnerable people achieving independent living
  - Adults with mental illness in settled accommodation
  - Adults with learning disabilities in settled Accommodation
  - Satisfaction with the quality of special educational needs services

This will help the Council to deliver the following *Equality and Inclusion Policy* objectives:

- Make Croydon a place of opportunity and fairness by tackling inequality , disadvantage and exclusion
- Encourage local people to be independent and resilient by providing responsive and accessible services offering excellent customer care.

**1.2.5 Analyse and identify the likely advantage or disadvantage associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a “protected characteristic”**

**Please see Appendix 2 (section 1) for a full description of groups.**

	<b>Likely Advantage</b> 😊	<b>Likely Disadvantage</b> ☹️
Disability	Provide a clear direction of travel for service development and improvement for people with SEN and disabilities	
Race/ Ethnicity	<b>N/A</b>	
Gender	<b>N/A</b>	
Transgender	<b>N/A</b>	
Age	Provide a clear direction of travel for service development and improvement for people with SEN and disabilities from birth to 64	
Religion /Belief	<b>N/A</b>	
Sexual Orientation	<b>N/A</b>	

Social inclusion issues	Support for outcomes for independent living; employment; friends, relationships, being part of the community	
Community Cohesion Issues	Wider understanding in the community through access to high quality information and advice – also early interventions to reduce crisis management and maximise independence	
Delivering Social Value	Maximising the opportunities for individuals to gain paid employment and achieve independence.	

<b>1.2.6</b>	<p><b>In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?</b></p> <p>For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation</p>
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The Framework will inform activity to ensure that services and opportunities are available locally

<b>1.2.7</b>	<p><b>Would your proposed change affect any protected groups more significantly than non-protected groups?</b></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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Yes – the Framework will impact more on children, young people and adults with disability.

<b>1.2.8</b>	<p><b>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?</b></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><b>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</b></p>
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Yes the Framework has been developed to drive change to advance equality of opportunity for children and young people with SEND and adults with disability.

<b>1.2.9</b>	<p><b>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?</b></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><b>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.</b></p>
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Yes - supporting people to be self-reliant, resilient and economically active will contribute towards tackling any forms of harassment or victimisation that might still exist in the borough

<b>1.2.10</b>	<p><b>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?</b></p> <p><i>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.</i></p> <p><b>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</b></p>
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Yes – providing opportunities for improved life outcomes will bring people together and foster understanding around the capabilities that people with disabilities can bring to employers and their local community.

### 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	Response
<b>Yes, further equality analysis is required</b>	Further analysis will be required as the change is likely to have an impact on some protected groups compared to non-protected groups – namely age and disability. The analysis will enable us to examine any equality and social inclusion implications and take actions to address these. The full equality analysis is under way but will not be completed until wider engagement with stakeholders has been completed to inform the finalised 0 – 65 Disability Framework – estimated to be by November 2015. The analysis will be published on the council website.

Decision	Response	
<b>Officers that must approve this decision</b>	<b>Name and position</b>	<b>Date</b>
<b>Report author</b>	Trisha Holmes	26 August 2015
<b>Director</b>	Ian Lewis Pratima Solanki	

#### 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)**

**Agreed further analysis required.**

<b>Name of Officer</b>	Yvonne Okiyo	
<b>Date received by Officer</b>	26.8.15 Response 10.9.15	
<b>Should a full equality analysis be carried out?</b>	Yes – reasons given above.	

**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.**

<b>2.1</b>	<p><b>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.</b></p> <p>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.</p>
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The **SEND Performance Dashboard** includes the following information on the 0 – 25 cohort

**0-25 cohort:** Croydon currently has 2100 pupils with statements of SEN that will transfer to education Health and care Plans by 31 March 2018. This number is set to increase by 5% each year. There are 11,311 children in Croydon schools receiving SEN Support through a graduated response. 427 children with disabilities receive social care support. From this cohort approximately 40 young people per year will require ongoing support into adulthood.

The majority of pupils with statements of SEN/Education Health and Care Plans are educated in mainstream schools. Children with complex SEN or disabilities may receive support from a range of agencies from early years through to adult life. This includes therapeutic interventions and other medical support. It also includes broader family support from social workers to address the challenges of managing complex needs in the home environment.

**Adult cohort (18-64):** According to the latest figures<sup>1</sup> in Croydon:

- 1 in 10 adults have a physical disability
- 1 in 50 adults have a learning disability
- 1 in 10 adults have a sensory impairment

### **Physical disabilities**

There are estimated to be 23,088 adults aged 18-64 with a physical disability living in Croydon in 2015 (of these 77.7% will have a moderate physical disability and 22.3% will have a serious physical disability).

The proportion of adults estimated to have a physical disability increases with age. The age group with the highest rate of physical disability is the 55 to 64 year old age group with 207 per 1,000 of the adult population estimated to have a moderate or serious physical disability. This is the equivalent of 2 in 10 people aged 55 to 64 in Croydon having a physical disability

### **Learning disabilities**

There are estimated to be 6,838 adults with a learning disability (aged 18 years and over) living in Croydon in 2015 (of these 79% will have a mild learning disability, 16% will have a moderate learning disability and 5% will have a severe learning disability).

There is some variation in the estimated prevalence rates of learning disabilities across the population, with higher predicted rates for the younger age groups. The age group with the highest rate of learning disability is the 18 to 24 years with 27.1 per 1,000 of the adult population. This is the equivalent to 3 in 100 people aged 18 to 24 having a learning disability in Croydon.

### **Sensory Impairment**

There are 34,451 adults aged 18 and over predicted to have a sensory impairment living in Croydon in 2015. Of these 13% are visually impaired (4,479) and 87% are hearing impaired (29,972). Visual impairment figures for those aged 18 to 64 years are only available for serious visual impairments. Hearing impairment figures are available for all adults aged 18 years and over predicted to have a moderate, severe or profound hearing impairment.

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<sup>1</sup> Source: Projecting Adult Needs & Service Information (PANSI), Rates calculated using predicted population for 2015



## Adults predicted to have a disability in Croydon by 2020<sup>2</sup>

The latest figures predict that in Croydon there will be a:

- 7% increase in adults with a physical disability by 2020
- 5% increase in adults with a learning disability by 2020
- 11% increase in adults with a sensory impairment by 2020

### Adults receiving services

The Physical Disability service is currently working with around 400 people and the Learning Disability service is currently working with 1,200 people. Services delivered include day care, direct payments, equipment and adaptations. Support is provided for independent living – training in independence skills, preparation for employment and housing options.

## SOCIAL IMPLICATIONS OF DISABILITY

The **Croydon Observatory** shows that 17% of the working age population in Croydon (aged 16 – 64) have a disability, with 4.6% claiming Disability Living Allowance. Under half (48.3%) of people with a disability state that they are in employment.

**The Department of Education data** identified that at Key Stage 2: 14% of pupils with statements of SEN achieved the expected level in maths and English in comparison to 88% with no SEN (2011). At Key Stage 4 : 9.5 % of pupils with statements of SEN achieved a level 2 qualification including maths and English in comparison to 70.4% with no SEN.

The **Communication Trust** has estimated that 60% of young people in the youth justice system have speech, language and communication needs. The **Prison Reform Trust** estimates that 20% - 30% of all offenders have learning disabilities and around 25% of young people in the Youth Justice system have a SEND – especially speech, language and communication.

### Feedback from consultation on the SEN reforms in 2014

Children and young people with special educational needs or disabilities and their families told us about their wants and needs in focus groups across the community, in primary and secondary schools (mainstream and special), in Croydon College and through surveys.

Recurring themes from young people centred on independent travel, attending college, getting their own home, having a family. They knew they needed support – help with finding work experience and employment, also mentoring to plan for independence.

2.2	<b>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.</b>
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<sup>2</sup> Source: Projecting Adult Needs & Service Information (PANSI), Rates; Office for National Statistics (ONS), 2012 SNPP SYA 2012 to 2037

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
Disability		People with disability can face exclusion from the labour market which impacts on their potential to live independently.	Croydon Observatory
Age Disability		Having a learning disability makes people vulnerable to getting drawn into offending or criminal behaviour. Being unable to communicate appropriately puts them at risk of being seen as aggressive or uncooperative. This clearly can impact on their life chances and well-being.	Prison Reform trust 2013  Communication Trust
Age Disability		Children with SEND have lower education attainment levels than their peers – this impacts on their future employment prospects and the potential to live independently as an adult.	KS2 2012/2013 / KS4 2012/2013
Age Disability	Families had good experience of services: <ul style="list-style-type: none"> <li>– Where individual practitioners made a difference</li> <li>– Support when it was needed</li> <li>– Personalised provision</li> <li>– Where progress was seen to be made</li> </ul>	Families had poor experience due to: <ul style="list-style-type: none"> <li>– Repeating the same thing to different teams</li> <li>– Too many forms all requesting the same information</li> <li>– Unclear criteria</li> <li>– Lack of support and signposting</li> </ul>	SEN Reforms feedback 2014

2.3	<p><b>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?</b></p> <p>Please read the corporate public consultation guidelines before you begin:  <a href="http://intranet.croydon.net/finance/customerservices/customerserviceprogramme/stepbystepguide.asp">http://intranet.croydon.net/finance/customerservices/customerserviceprogramme/stepbystepguide.asp</a>.</p>
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Further consultation is required with children and young people with SEND and their families as well as with adults with disabilities and their families. Also with other stakeholders such as community and disability organisations. Focus groups and a questionnaire will be used to engage as widely as possible. This should be completed by November 2015.

<b>2.4</b>	<p><b>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.</b></p> <p>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</p>
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Group's with a "Protected characteristic" and broader community issues	Missing information and description of potential disadvantageous impact	Proposed action to gather information
<b>Disability Age</b>	Understanding of whether services currently meet needs appropriately and whether there are gaps in provision – and how the Framework will help. Without this information it will be difficult to make changes that benefit people with disabilities. It will negatively impact on life chances and outcomes.	Focus groups / questionnaire
<b>Disability Age</b>	Understanding of what needs to be put in place to encourage service users to become more independent and resilient. If this information is not captured the expectations that individuals and families can help themselves will not be met and could be high risk. The information will directly inform commissioning and delivery of services. .	Focus groups / questionnaire
	Other issues may arise due to feedback from consultation and will be added here.	

**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.

<b>3.1</b>	<p><b>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.</b></p>
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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
		This section will be completed once consultation has been completed and there is greater understanding of potential adverse impact.		

<b>3.2</b>	<b>How will you ensure that the above actions are integrated into relevant annual department or team service plans and the improvements are monitored?</b>
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To be completed once consultation has finished.

<b>3.3</b>	<b>How will you share information on the findings of the equality analysis with customers, staff and other stakeholders?</b>
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To be completed once consultation has finished

Section 4	Decision on the proposed change
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<b>4.1</b>	<b>Based on the information in sections 1-3 of the equality analysis, what decision are you going to take?</b>
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Decision	Definition	Yes / No
<b>We will not make any major amendments to the proposed change because it already includes all appropriate actions.</b>	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.	To be completed once consultation has finished
<b>We will adjust the proposed change.</b>	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.	To be completed once consultation has finished
<b>We will continue with the proposed change as planned because it will be within the law.</b>	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.	To be completed once consultation has finished

<b>We will stop the proposed change.</b>	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.	To be completed once consultation has finished

<b>4.2</b>	<b>Does this equality analysis have to be considered at a scheduled meeting?</b> If so, please give the name and date of the meeting.
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**Cabinet 20 October 2015 – to support the draft 0 - 65 Disability Framework**

<b>4.3</b>	<b>When and where will this equality analysis be published?</b>  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.
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**The equality analysis will be published in November 2015 and will be available on the Council website.**

<b>4.4</b>	<b>When will you update this equality analysis?</b>  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
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**The analysis will be updated once consultation on the 0 - 65 Disability Framework has been completed and analysed. This will then be used to finalise the Framework and begin to re-shape services based on need.**

<b>4.5</b>	<b>Please seek formal sign of the decision from Director for this equality analysis?</b> This confirms that the information in sections 1-4 of the equality analysis is accurate, Comprehensive and up-o-date.
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Officers that must approve this decision	Name and position	Date
Head of Service / Lead on equality analysis		
Director		
<p>Email this completed form to <a href="mailto:equalityandinclusion@croydon.gov.uk">equalityandinclusion@croydon.gov.uk</a>, together with an email trail showing that the director is satisfied with it.</p>		