

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?

Implementation of a Youth Crime Prevention Plan

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.

Whilst overall levels of youth crime are reducing some crime types remain a concern. A Youth Crime Prevention Plan has been developed that sets out how agencies should work in partnership to protect young people from being victims or perpetrators of crime.

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 plan has been drafted, it has been discussed at the Safer Croydon Partnership Board and the Youth Crime sub-group and is scheduled to go to Cabinet for final approval in October 2015.

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 Plan sets out a range of partnership actions to both protect victims and target perpetrators. It is specifically targeted at young people who are at risk of being victims of crime or are identified offenders and sets out a programme of work that will be delivered by various Council teams, the police, health services and the voluntary sector. Young black men are disproportionately represented as offenders within the Youth Justice System. Commissioned voluntary sector agencies will have particular skills and experience in working with this group although they will not be targeted to work with this specific group but any young person that has an identified need.

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?

It is specifically targeted at young people who are at risk of being victims of crime or are identified offenders. The outcomes the plan is designed to achieve are:

- Improved early identification of children and young people at risk of offending and Anti-social behaviour
- Reduction in the number of young people enter the criminal justice system for the first time
- Reductions in the numbers of young people re-offending
- Improved identification and targeting of young people involved in gang activity and are

provided opportunities and support to exit gangs

- Improved life chances for those young people identified as at high risk of re-offending or committing anti-social behaviour
- To reduce the number of victims of youth crime
- Improved partnership working to protect young people at risk violence, sexual exploitation, gangs, bullying and domestic abuse
- There is active engagement to ensure young people are contributing to solutions in regard to crime issues of concern to them.

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. The plan specifically targets young people but there are identified issues with a high proportion of young black men being identified as offenders of serious youth violence, robbery and knife crime. The offender population is identified as:

SYV – 58.5% black males

Knife Crime – 47.3% black males

Robbery – 54.7% black males

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 and Inclusion Policy <https://www.croydon.gov.uk/community/equality/ei-policy> 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 equality objectives / indicators that are set out in the Council's Equality and Inclusion Policy 2014-16. These are:

- Foster good community relations and cohesion by getting to know our diverse communities and understand their needs.
- Make Croydon a place of opportunity and fairness by tackling inequality, disadvantage and exclusion.

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	Positive in terms of reducing likelihood of being a victim of crime if young	None
Race/ Ethnicity	Actions to reduce offending behaviour should impact positively	Targeting of young black males could be perceived as a disadvantage as they feature most prominently as offenders
Gender	Actions to reduce offending behaviour and potential victimisation should impact positively	More targeting of males could be perceived as a disadvantage as they feature most prominently as victim and perpetrator however the outcome should positive to the community
Transgender	Positive in terms of reducing likelihood of being a victim of crime if young	None
Age	Positive in terms of reducing likelihood of being a victim of crime if young	None
Religion /Belief	Positive in terms of reducing likelihood of being a victim of crime if young	None
Sexual Orientation	Positive in terms of reducing likelihood of being a victim of crime if young	None
Social inclusion issues	Less crime and youth victimisation	None
Community Cohesion Issues	Less crime and youth victimisation	None
Delivering Social Value	Less crime and youth victimisation	None

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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Some activity identified in the plan will focus on the areas where there are high levels of youth crime and victimisation. These are most notable in the town centre and in the north of the borough

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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Other than young people as victims and young black males identified as offenders no. The overall effect of the plan should be positive to the population as a whole

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 plan is designed to reduce youth crime victimisation and reduce offending by young people so it will help the Council advance equality of opportunity. Particularly in respect of young people.

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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It should positively help the Council although there will be some targeting of specific groups, which could be perceived as discriminatory. In particular, this means the targeting of young black men who are identified as offenders as they represent a high proportion of the cohort as identified in 1.2.3

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

This is likely to help the Council. We are aiming to engage more with young people so that they have a voice and will be putting in specific measures to make young people safer and reduce the chances of them becoming a victim of crime

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
<p>No, further equality analysis is not required</p>	<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>	

Decision	Guidance	Response
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>	<p>A full Equalities Analysis is required given that the plan is specifically targeted at young people and that a high proportion of young black males are identified as offenders.</p> <p>The full analysis will be completed by the time the report goes to cabinet in October and will be published on the Council's website.</p> <p>It will be updated as appropriate to reflect any actions that are identified as a result of the monitoring of the Youth Crime Plan</p>
Officers that must approve this decision	Name and position	Date
Report author	Andy Opie	
Director	Andy Opie, Director of Safety	9 th Sept 2015

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)

Name of Officer		
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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	<p>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.</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 2012/2013 Strategic Analysis informed the current 2014-2017 Community Safety Strategy. The data use came from the following departments and partner agencies:

Metropolitan Police, Probation, Community Safety Services, Housing, Licensing, Noise Team, Drug and Alcohol Action Team, Youth Offending Services, London Ambulance Service and London Fire Brigade

The key points relating to Young People from the Strategic Assessment are:-

Victims

- There are more male victims than females, but there were more female victims of common assault than males
- Croydon has the highest volume of Domestic Violence incidents in London
- Assault with injury – the most vulnerable age group is 20 to 24 years old
- Most Serious Violence – the most vulnerable age group is 15 to 24 years old
- Serious Youth Violence – the most vulnerable age group is 16 to 19 years old
- Common Assault - the most vulnerable age group is 20 to 24 years old

- Knife Crime - the most vulnerable age group is 15 to 19 years old
- Gun Crime - the most vulnerable age group is 25 to 29 years old
- Robbery - the most vulnerable age group is 15 to 19 years old

Offenders

- More male offenders than female
- Assault with injury – 806 domestic violence offenders, age group 20 to 24 years old
- Most Serious Violence – 173 total, age group 15 to 24 years old
- Serious Youth Violence – 115 total, age group 15 to 19 years old
- Common Assault – 378 total, age group 20 to 24 years old
- Knife Crime - 194 total, age group 15 to 19 years old
- Gun Crime – 26 total, age group 18 to 20 years old
- Robbery - 309 Offenders - age group 15 to 19 years old
- Theft of MV – 44 total, age group 15 to 19 years old

Locations

- Town Centre is the key crime hot spot and inner northern wards primarily due to large population and transport links

Time

- More crime over the week ends between 3 and 7 pm and then again between 9 and 2am
- Throughout the week the peak time is between 3 and 7pm

Key points

- Offenders are getting younger, 15% of all robbery offenders were aged 10 to 14 years old
- Total recorded crime continues 10 year downward trend.
- Current trends also show that anti-social behaviour has dropped by 10.46% (1883 incidents) compared with the previous year

Public consultation Top 5 crimes

- Violent crime
- Anti-social behaviour
- Youth crime
- Robbery
- Burglary

The most popular comment arising from the public consultation:- *More police would make the public feel safer.*

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
Race/ Ethnicity	<ul style="list-style-type: none"> • Actions to reduce offending behaviour should impact positively • Lots of work underway to reduce the number of first time entrants into the Criminal Justice System 	<ul style="list-style-type: none"> • Targeting of young black males could be perceived as a disadvantage as they feature most prominently as offenders 	<p>Youth Crime Board Sept 15:</p> <p>The number of black and black British young people involved in youth justice has reduced to 12 pp over the background population which is a significant reduction and trend needs to be more closely monitored</p>
Age	<ul style="list-style-type: none"> • Actions to reduce offending behaviour should impact positively • Lots of work underway to reduce the number of first time entrants into the Criminal Justice System 	<ul style="list-style-type: none"> • Targeting of young black males could be perceived as a disadvantage as they feature most prominently as offenders 	<p>Early Interventions work</p>
Religion /Belief	<ul style="list-style-type: none"> • Positive in terms of reducing likelihood of being a victim of crime if young 		
Sexual Orientation	<ul style="list-style-type: none"> • Positive in terms of reducing likelihood of being a victim of crime if young 		
Social inclusion issues	<ul style="list-style-type: none"> • Less crime and youth victimisation 		

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
Community Cohesion Issues	<ul style="list-style-type: none"> Less crime and youth victimisation 		
Delivering Social Value	<ul style="list-style-type: none"> Less crime and youth victimisation 		

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>.

Performance monitoring youth crime is done regularly with disproportionality of young black men an indicator that is reported to every meeting of the Youth Crime Prevention Board. Analysis of victims and offenders is done at least annually but if there is an indication of fluctuating crime trends it can be done more often.

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

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
Race	Targeting of young black men for interventions as they are disproportionately represented	Monitoring disproportionality of black men in the Youth Justice System to identify patterns or specific issues that need addressing	Youth Crime Prevention Board	Ongoing

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?

The Youth Crime Board regularly monitor the following KPI's:

National Indicators

1. NI 19 Re-offending
2. NI 43 Reducing the use of custody
3. NI 111 Reducing First Time Entrants

Local Indicators

4. Percentage of young offenders who are engaged in suitable education, training and employment
5. Percentage of known young offenders who have access to suitable accommodation
6. Number of Young people with Substance misuse accessing treatment
7. Ethnic composition of offenders on Youth Justice System disposals

3.3 How will you share information on the findings of the equality analysis with customers, staff and other stakeholders?

Information to be published on the Croydon web pages

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?

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.	NO
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.	YES
We will stop the proposed change.	The proposed change would have adverse effects on one or more protected groups that are not justified and	NO

	cannot be lessened. It would lead to unlawful discrimination and must not go ahead.	
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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.
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Yes – it will be shared with the Youth Crime Prevention Board and Cabinet

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.
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Information to be published on the Croydon web pages.

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
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We will review at the same time that the Youth crime Prevention Plan is next updated

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.
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Officers that must approve this decision	Name and position	Date
Head of Service / Lead on equality analysis	Cheryll Wright, Safer Croydon Partnership	12/10/15
Director	Andy Opie	14/10/15

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