

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?

Reducing Temporary Accommodation Expenditure

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.

To secure a further 250 units of 2/3 bed accommodation for affordable housing. This will provide accommodation for homeless households, particularly for single parents with dependent children.

The proposal will have a positive impact on homeless households, among whom younger people, female heads of households, lone parents and BME households are over-represented as it reduces our dependency on unsuitable expensive B&B type of accommodation and will provide affordable accommodation on assured short-hold tenancies for up to 3 years.

This will reduce the council’s annual costs on expensive and unsuitable emergency accommodation (EA), by freeing up temporary accommodation (TA) and providing an additional 250 units of affordable accommodation.

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.

Currently seeking cabinet approval in July 2017.

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.

Internal stakeholders (Senior Officers, and front line officers)

- Housing Initiatives Team
- Gateway and Welfare Services
- People – Adult & Children’s (responsible care leavers) Services

Members

- Cabinet Members and Shadow Cabinet Members responsible for housing
- Ward Members

External stakeholders

- Customers
- The LLP
- Local voluntary and community groups

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?

250 quality affordable 2/3 bed accommodation will be made available under an assured shorthold tenancy for up to 3 years for customers who are currently living in emergency & temporary accommodation. This will provide a more secure living arrangement for families who are currently living in shared & self-contained emergency and temporary accommodation.

The proposal focuses on 2 & 3 bedroomed properties, as these are the property sizes for which we have the greatest shortfall. In 2017/18, Croydon is short of 2 beds by 826 units and short of 3 bed properties by 625.

The properties will be leased into a Limited Liability Partnership (the council will have a freehold interest in the properties) and the management will be contracted to Croydon Council. The management of the properties will be provided by Croydon Council Housing Needs Service.

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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/)
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Yes. A breakdown of households currently placed in EA shows that:

- A very high % are from BME groups
- The vast majority are households with dependent children
- Female lone parent households account for two thirds of all households in B&B
- Most households are in younger age groups with very few older people.

Evidence from other sources (e.g. P1e returns, recent equalities analysis carried out by the Department for Communities on proposals to do with homelessness in the Localism Bill and by the Council on changes proposed to the housing allocations scheme) shows that homeless applicants households are more likely to be female-headed households, young and from a BME group than the general population.

It is considered that this proposal will meet the needs of the majority of these family households enabling more of them to move out of bed and breakfast.

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
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National Indicators
Information on housing activity and homelessness is provided to the government on a quarterly basis (annually for housing register and lettings information) and published on the www.gov.uk website.

These include:

- Homeless applications and acceptances
- Reasons for homelessness
- Households in temporary accommodation
- Households on the housing waiting list

Local Indicators
The proposed change relates to the objective below in the council's Equality an Inclusion Policy (2016-2020)

Housing: To increase the support offered to people who find themselves in a position where they are accepted as homeless especially those from BME backgrounds and women

Ambitious for Croydon indicators include:

- The number of female lone parent households found to be eligible for assistance, unintentionally homeless, and in priority need
- The number of BME households found to be eligible for assistance, unintentionally homeless,

and in priority need.

In both cases, the indicators show that a majority of homeless households are from BME groups and are female lone parent households.

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.

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	No potential advantage has been identified as a result of this proposal as people with disabilities are likely to require more specialized accommodation	No potential disadvantage has been identified.
Race/ Ethnicity	BME households are overrepresented among homeless households compared to the general population. BME households, most of whom have dependent children, should benefit from an increase in the supply of 2 and 3 bedroom affordable accommodation made available to homeless households	No potential disadvantage has been identified
Gender	Female lone parents are highly overrepresented among homeless households. Female headed households living in unsuitable emergency accommodation will benefit from a sustainable supply of 2 and 3 bedroom affordable accommodation made available to homeless households	No potential disadvantage has been identified
Transgender	No potential advantage has been identified.	No potential disadvantage has been identified
Age	Homeless households tend to be younger than the general population. Most of these younger households are families with children and so should benefit from an increase in the supply of 2 and 3 bedroom affordable accommodation. There are very few older homeless households and their needs can be adequately met through the supply of sheltered housing.	No potential disadvantage has been identified
Religion /Belief	No potential advantage has been identified	No potential disadvantage has been identified
Sexual Orientation	No potential advantage has been identified	No potential disadvantage has been identified

Pregnancy and Maternity	No potential advantage has been identified	No potential disadvantage has been identified
Social inclusion issues	No potential advantage has been identified	No potential disadvantage has been identified
Community Cohesion Issues	No potential advantage has been identified	No potential disadvantage has been identified
Delivering Social Value	No potential advantage has been identified	No potential disadvantage has been identified

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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Our assessment of future homelessness demand suggests that the need for emergency accommodation is more likely to increase. If we did not secure this kind of accommodation for use over the long-term, then many homeless households would potentially remain in nightly paid B&B or insecure accommodation for longer.

There is a long-term benefit to protected groups as this will minimise their time spent in unsuitable accommodation. Demand for accommodation will increase in the coming years. It is predicted that need for 2 and 3 bedroomed accommodation will rise to 968 and 658 by 2020/21 respectively.

By securing this kind of accommodation long-term will ensure that the protected groups most affected by homelessness are placed in better quality accommodation with more security as well as minimising costs to the public purse.

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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Households from BME, female-headed and younger households are over-represented among homelessness household and will benefit from the proposed change. But whilst provision of this accommodation will benefit higher numbers of BME, female headed and younger households, because of their higher numbers within the total homeless cohort, it not likely to have a disproportionate impact on protected groups in Croydon or to affect them more significantly than other groups as it is providing accommodation intended for those in greatest need. For example, female-headed households or BME households are not prioritized for the proposed homes compared to two adult households or white households.

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 not?</p> <p>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 <i>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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Yes, the proposal should help in promoting equality of opportunity, recognising that BME, female headed and younger households are over-represented among homeless households, by providing more suitable, long-term and affordable accommodation.

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>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</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 should not hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic.

1.2.10	<p>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?</p> <p>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 <i>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 changes should not hinder the Council in fostering good relations between people who belong to any protected groups and those who do not.

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>	<p>This initial assessment has identified that BME, female headed and younger households are over-represented among homeless households and so will benefit from this proposal.</p> <p>The proposal does not detrimentally affect any households from protected groups or disproportionately affect them compared to other groups.</p> <p>We will continue to monitor outcomes in terms of the make-up of homeless households</p>
<p>Yes, further equality analysis is required</p>	<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>Officers that must approve this decision</p>	<p>Name and position</p>	<p>Date</p>
<p>Report author</p>		
<p>Director</p>		

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)

A full EqIA is not required at this stage. The summary above has identified where there is need in terms of the protected groups, and how this work will positively impact those groups, whilst not significantly negatively impacting on any other protected group.

Name of Officer	Richard Eyre – Strategy Manager (Adults)	
Date received by Officer	23.06.2017	Please send an acknowledgement
Should a full equality analysis be carried out?	No.	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.

Homelessness Strategy 2008 to 2013 EqIA – the EqIA sets out the main protected groups benefiting from homelessness activity as women, single people with support needs, young people, BME households, particularly Black African and Caribbean households, disabled people, older people, lesbian, gay, bisexual and transgender (LGBT) people.

Equalities monitoring of housing allocations report: 68% of applicants on the waiting list were from BME groups. BME applicants represented 80% of applicants requiring larger homes. A waiting list snapshot taken in March 2015 found that 466 applicants were recorded as having a disability, representing 9% of the waiting list overall. Of these: 120 (26%) required wheelchair accommodation, 157 (34%) adapted accommodation, 91 (20%) were recorded having a housing need as a result of poor mental health, 67 as a result of a learning disability (14%), and 31 (7%) as a result of visual impairment.

Draft Homelessness Review: This provided detailed information on a number of groups with protected characteristics in relation to homelessness demand, summarized below:

Gender

More than 6 out of 10 homeless households are headed by a single female applicant

Age

Homeless applicants tend to be younger than the general population, with over half of homeless applicants aged between 25 and 44. Only 28 of applicants to the statutory homeless service (2% of all applications) were vulnerable due to old age

Ethnicity

Black and Black British households are overrepresented among homeless households. In Croydon, Black or Black British people make up 20.2% of Croydon's population as a whole but account for 46% of homeless households. 30% of homeless households are from a White ethnic background.

Households with children

More than 8 out of ten households accepted as homeless have dependent children

People with disabilities

The numbers of people accepted as homeless with physical or learning disabilities is relatively small compared to other groups

People with mental health problems

Homeless applicants with a priority need arising from vulnerability comprised 23% of all homeless applications in 2012/13. This compares with 17% in 2010/11. The majority (84%) of these applicants fell into three groups: vulnerability for medical reasons (30per cent), other special reasons (21%) and mental health (33%)

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
AGE	Younger people are more highly represented among homeless households and should benefit from a sustainable supply of suitable local TA. However, the impact is not considered to be significant compared to other groups.		Draft Homelessness Review
GENDER	Female headed households are overrepresented among homeless households and should benefit from a sustainable supply of local TA accommodation. However impact is not considered to be significant.		Draft Homelessness Review
BME	BME households are over-represented among homeless households and should benefit from a sustainable supply of suitable local TA, hhowever, the impact is not considered to be significant.		Draft Homelessness Review

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source

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: Consultation not needed as this is an extension of an existing scheme. The council monitors homelessness and its TA portfolio so we are able to monitor protected groups; this will continue.

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

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?

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

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.	
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.	<p>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.</p> <p>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.</p>	
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.

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.

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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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		
Director		

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