

Cabinet Agenda



To: Mayor Jason Perry (Chair)

Councillors Jeet Bains, Jason Cummings, Maria Gatland, Lynne Hale,
Yvette Hopley, Ola Kolade, Scott Roche and Andy Stranack

A meeting of the **Cabinet** which you are hereby invited to attend, will be held
**Wednesday, 27 September 2023 at 6.30 pm. Council Chamber, Town Hall,
Katharine Street, Croydon CR0 1NX.**

Katherine Kerswell
Chief Executive
London Borough of Croydon
Bernard Weatherill House
8 Mint Walk, Croydon CR0 1EA

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AGENDA

1. **Apologies for Absence**

2. **Disclosure of Interests**

Members and co-opted Members of the Council are reminded that, in accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, they are required to consider **in advance of each meeting** whether they have a disclosable pecuniary interest (DPI), an other registrable interest (ORI) or a non-registrable interest (NRI) in relation to any matter on the agenda. If advice is needed, Members should contact the Monitoring Officer **in good time before the meeting**.

If any Member or co-opted Member of the Council identifies a DPI or ORI which they have not already registered on the Council's register of interests or which requires updating, they should complete the disclosure form which can be obtained from Democratic Services at any time, copies of which will be available at the meeting for return to the Monitoring Officer.

Members and co-opted Members are required to disclose any DPIs and ORIs at the meeting.

- Where the matter relates to a DPI they may not participate in any discussion or vote on the matter and must not stay in the meeting unless granted a dispensation.
- Where the matter relates to an ORI they may not vote on the matter unless granted a dispensation.
- Where a Member or co-opted Member has an NRI which directly relates to their financial interest or wellbeing, or that of a relative or close associate, they must disclose the interest at the meeting, may not take part in any discussion or vote on the matter and must not stay in the meeting unless granted a dispensation. Where a matter affects the NRI of a Member or co-opted Member, section 9 of Appendix B of the Code of Conduct sets out the test which must be applied by the Member to decide whether disclosure is required.

The Chair will invite Members to make their disclosure orally at the commencement of Agenda item 3, to be recorded in the minutes.

3. **Minutes of the previous meeting (Part A) (Pages 5 - 18)**

To approve the Part A minutes of the meeting held on 26th July 2023 as an accurate record.

4. **Urgent Business (If any)**

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

5. **Scrutiny Stage 1** (Pages 19 - 32)
6. **Scrutiny Stage 2** (Pages 33 - 48)
7. **A Public Spaces Protection Order (PSPO) in Croydon Thornton Heath** (Pages 49 - 90)
8. **Youth Safety Delivery Plan** (Pages 91 - 134)
9. **Report on 10 Experimental Healthy School Streets Schemes (Group 2)** (Pages 135 - 244)
10. **Equality Annual Report 2023** (Pages 245 - 268)
11. **Refreshed Croydon Equality Strategy 2023-27** (Pages 269 - 350)
12. **Progress update on the People and Cultural Transformation Strategy 2022-2026 and Action Plan** (Pages 351 - 386)
13. **Period 3 2023-24 Financial Performance Report** (Pages 387 - 420)
14. **Quarterly Procurement Plan Update Q2 2023-24** (Pages 421 - 428)
15. **Oracle Improvement Programme** (Pages 429 - 438)
16. **Future of Croydon Affordable Homes** (Pages 439 - 446)

PART B AGENDA

17. **Exclusion of the Press and Public**

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

“That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended.”
18. **Minutes of the previous meeting (Part B)** (Pages 447 - 448)

Approve the draft Part B minutes of the previous meeting held on the 26th July 2023.

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Cabinet

Meeting of Cabinet held on Wednesday, 26 July 2023 at 6.30 pm in Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX

MINUTES

Present: Mayor Jason Perry (Chair);

Lynne Hale (Deputy (Statutory) Executive Mayor and Cabinet Member for Homes (Vice-Chair)), Councillors Jeet Bains (Cabinet Member for Planning and Regeneration), Jason Cummings (Cabinet Member for Finance), Maria Gatland (Cabinet Member for Children and Young People), Ola Kolade (Cabinet Member for Community Safety), Scott Roche (Cabinet Member for Streets and Environment) and Andy Stranack (Cabinet Member for Communities and Culture)

Also Present: Councillor Margaret Bird (Deputy Cabinet Member for Health and Adult Social Care), Councillors Rowenna Davis (Chair of Scrutiny and Overview Committee), Stuart King (Leader of the Opposition), Callton Young (Deputy Leader of the Opposition and Shadow Cabinet Member for Finance), Janet Campbell (Deputy Leader of the Opposition and Shadow Cabinet Member for Health and Adult Social Care), Amy Foster (Shadow Cabinet Member for Children and Young People), Chrishni Reshekaron (Shadow Cabinet Member for Homes), Christopher Herman (Shadow Cabinet Member for Streets and Environment), Richard Chatterjee

Apologies: Councillor Yvette Hopley (Cabinet Member for Health and Adult Social Care),

PART A

28/23 **Disclosure of Interests**

There were none.

29/23 **Minutes of the Previous Meeting**

The minutes of the Cabinet meeting held on Wednesday 28 June 2023 were agreed as an accurate record.

30/23 **Urgent Business (If any)**

There were no items of urgent business.

Secretary of State

The Executive Mayor highlighted with Cabinet of the positive update received from the Secretary of State, Michael Grove.

The Statement acknowledged the improvements made over the past year, and confirmed the strengthening of the Improvement Panel emphasising that the Panel's role would be to support and guide the council and intervene as a last resort if dissatisfied with the improvement process.

This demonstrated the government's confidence in the council's ability to address challenged faced.

31/23

Scrutiny Stage 2

The Executive Mayor introduced the Scrutiny Stage 2: Recommendations arising from Scrutiny report and welcomed the committee's focus on the Council Tax Hardship Scheme and providing a report on the transformation programme.

The Chair of Scrutiny and Overview Committee, Councillor Rowenna Davis, addressed the Cabinet and highlighted three areas of discussion:

- Council financial recovery. The Period 2 financial monitoring report had shown a £3.8 million pounds of overspend and high level of unfilled vacancies across all departments which impacted services residences received.
- 15% council tax rise. The hardship scheme to help with residents struggling had shown that 98 awards were made and 283 applications had been received, which was low. There were concerns that the low uptake of funding was a result of residents unaware of the support available. There was also a recommendation for a revised letter to residents for those falling into arears with help they would be entitled to.
- The work of the Home Sub-Committee and insight to the homelessness restructure. The Sub-Committee heard that the service had prevented 24% of homeless cases which was below the London average highlighting the scale and detriment of hardship homeless residents were in. The Sub-Committee welcomed the aims of the restructure and emphasis on prevention which included face to face appointments for those facing homelessness.
- The Housing repairs contract. Officers were commended for the huge amount of work put into the smooth transition of the new contractors scheduled to take over, though concerns were raised that the system used to report housing problems was in itself currently under review.

The Cabinet Member for Finance, Councillor Jason Cummings, clarified on the Period 2 financial report that the departmental £3.8 million pounds overspend was balanced by the use of contingency which was a normal process within the council, and the year-end position forecasted would address balance and not overspend. The update of the council tax support was noted to be shockingly low. The update was not measured as a high or low take up, though the take up only occurred after the £33 million pound worth of council tax support that was already given out in the earlier stages.

The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne Hale, acknowledged that homeless prevention was not provided as it should and shared that with the transformation taking place the homelessness support would to be given as early as possible and staff restructure would signify the significant change. Officers was thanked for their housing repairs procurement work.

The Executive Mayor in Cabinet **RESOLVED:**

To approve the response and action plans attached to this report at Appendix 1 and 2 and that these be reported to the Scrutiny and Overview Committee or relevant Sub-Committees.

32/23

Regina Road Project – Outcome of Ballot and Next Steps

The Executive Mayor introduced the Regina Road Project – Outcome of Ballot and Next Steps report which resulted in a resounding “yes” vote to proceed with the council’s Landlord Offer (as agreed by Cabinet on 22 March 2023). The Landlord Offer proposed the demolition and redevelopment of the three aging towers and properties in the immediate surrounding area within the red line boundary on the Regina Road Estate.

Mr Leon Mcleod, a resident and part of the working group shared with Cabinet his perspective on the Regina Road project to date, which was transparent and slowing improving.

The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne Hale thanked the residents of Regina Road who participated in the ballots and shared with Cabinet that the report set out the next steps for rebuilding the area, following the approval of the Landlord Offer. On-going conversations with residents also played a key role in the progress of the rebuild.

The Corporate Director for Housing, Susmita Sen, addressed Cabinet of the amendment to the recommendation in the report to paragraph 2.2.3 (recommendation 1.2.3 below), which was noted.

The Shadow Cabinet Member for Homes, Councillor Chrishni Reshekaron welcomed the Regina report project and thanked the project lead and staff for all their work.

The Executive Mayor in Cabinet **RESOLVED**:

- 1.1. To consider the outcome of the Ballot (“Are you in favour of the proposal to demolish and rebuild homes as shown within the red line boundary on the Regina Road estate) in which the majority of eligible residents voted “Yes” as detailed at Section 4 of this report.

- 1.2. Subject to statutory processes for obtaining suitable Planning Permissions and other relevant permissions/ consents for the purposes of the project and having due regard to the equalities considerations, the financial and legal implications and risks set out within the report:
 - 1.2.1 To agree the demolition of the three towers and immediate surrounding area included within the red line shown in the Landlord Offer;

 - 1.2.2 To confirm and approve the Landlord Offer in Appendix A;

 - 1.2.3 To approve the project to deliver in phases 200 new social rented homes on the Regina Road Estate. In addition, up to 25 replacement homes (to include the option of shared equity) for eligible existing leaseholders/freeholders within the red line area.

- 1.3. In accordance with the Landlord Offer, approve the commencement of acquisition of freehold/ leasehold interests on the properties within the red line area via negotiation in the first instance and under terms that would apply pursuant to a Compulsory Purchase Order (CPO).

- 1.4. Delegate authority for the approval of compensation packages for the acquisition of individual freehold/leasehold interests to the Corporate Director of Housing in consultation with the Corporate Director of Finance and Section 151 Officer.

- 1.5. To authorise preparation in due course of a Compulsory Purchase Order to cover all properties within the red line shown in the Landlord Offer.
- 1.6. For the reasons set out in section 4, to delegate authority to the Corporate Director of Housing to agree whether or not homes within the red line shown in the Landlord Offer are considered to be obsolete in accordance with the definition used by the Greater London Authority in their Affordable Housing Capital Funding Guide.
- 1.7. To approve the continued rehousing of all secure tenants remaining in the properties within the red line area to enable vacant possession of the blocks in accordance with the Landlord Offer in order that the delivery of the proposed redevelopment of the Regina Road Estate can proceed, including, if necessary, by way of service of the requisite statutory notice seeking possession from secure tenants under Ground 10 of Schedule 2 of the Housing Act 1985.
- 1.8. To delegate authority to the Corporate Director of Housing, in consultation with the Cabinet Member for Homes, to serve demolition notices under the Housing Act 1985, as amended, in order to suspend qualifying tenants from exercising their Right to Buy (RTB) for a period of up to 5 years from the date of service. Further, in consultation with the Director of Legal Services and Monitoring Officer, to settle any claims pursuant to the service of such notices.
- 1.9. To note the following actions to provide early decant capacity for residents:
 - (i) Allocation of the 12 new homes at Trellis Mews to residents of nos 1-87 Regina Road wherever possible, according to their Housing Need.
 - (ii) Subject to internal governance processes, purchase up to 50 homes suitable for rehousing sufficient residents on a temporary or permanent basis, according to Housing Need.
 - (iii) To ensure nos 1-87 Regina Road and other properties within the red line area are emptied as may be necessary as detailed design progresses through ongoing design engagement with Croydon Local Planning Authority, with the financial implications to be addressed via the Housing Investment Plan.

- (iv) Subject to internal governance processes, build up to 9 new build homes at Malton House as part of Phase 1 social rent/shared equity homes at Regina Road

1.10. To authorise officers to apply to the Greater London Authority for Investment Partner Status, and for funding towards new homes, both social rented and shared equity, to be built to rehouse existing residents in phases at Regina Road and Malton House in accordance with the Landlord Offer in Appendix A.

1.11. To authorise the Corporate Director of Housing to apply to the Local Planning Authority for all the necessary Planning Permissions and other statutory consents for the demolition of all properties within the red line area and for the rebuilding on a phased basis within the context of an indicative Masterplan for the area within the red line in the Landlord Offer in Appendix A.

33/23

Update on the Housing Transformation Programme

The Executive Mayor introduced the Update on the Housing Transformation Programme report which provided an in-depth overview of the progress made in thirty-two live projects.

The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne Hale, shared with Cabinet that the voice of the residents continued to shape the transformation of the whole service and thanked all officers and Housing Improvement Board in acknowledging residents' views within the project.

The Shadow Cabinet Member for Homes, Councillor Chrishni Reshekaron, noted that one of focus for the transformation programme was the prevention of homelessness, and asked what would be done to address the increase of homelessness within the borough and what support would be provided to residents who find it difficult to pay rent due to the cost-of-living crisis.

The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne Hale, noted that the prevention of homelessness was a key area of transforming the housing service, to review the service provided for residents and within departments. There would be a new service commencing in Autumn to address homelessness. The Corporate Director of Housing, Susmita Sen, added that as a service, homelessness was to be addressed at a much earlier stage, 24% was not good enough and the aim was to reach the 40% average mark. The prevention of homelessness would include understanding the causes of homelessness

with a series of interventions in support. This would be on a case-by-case merit.

The Executive Mayor added that there were a number of hardship funds available for general household support as well as council tax for residents to apply and noted that the housing service was on a journey of transformation and commended all officers and other supporting Panels for their work to engage early intervention to prevent the homelessness.

The Executive Mayor in Cabinet **RESOLVED**:

To note the progress since December 2022 on the Housing Transformation Programme.

34/23

2023-2024 - Period 2 Financial Performance Report

The Executive Mayor introduced the 2023-2024 Period 2 Financial Performance Report which remained on track for a balanced budget.

The Cabinet Member for Finance, Councillor Jason Cummings, informed that to be in a position of Period 2 where we are predicting a year end balance was welcomed and hoped for continuation of this throughout the year. The report highlighted departmental overspend which was mainly demand-led in particular to do with placements costs and the total year end position that generate sat within the £5 million contingency in the budget so it would not result in the year end overspend. It was noted that there was intention for all departmental budgets be helped through the course of the year with overspend pulled back in individual departments.

The Shadow Cabinet Member for Finance, Councillor Callton Young, noted the councils hope to avoid overspend in the children's and adults department, and asked how confident was the council's capacity to deliver the savings at the pace required, and the confidence of the deliverable ability of another robust adult's social care savings plan and making the next plan land.

The Executive Mayor confirmed confidence as there was a responsible physical financial management in place within the council and dealing with the budgets of the council in an appropriate way, understanding the position the council was in. The Cabinet Member for Finance, Councillor Jason Cummings, added his confidence in the council's departmental ability to deliver savings targets, in particular within the adult's social care department. Demand pressure sat outside of the ability for the council to control, and as such a need for service would be required which costs were being managed.

The Leader of the Opposition, Councillor Stuart King, noted that it was an error not to include the Period 1 financial report figures to gain a fuller

picture of the financial performance report, and further noted a change in the reporting on the quantifying risks and opportunities with values attached was no longer provided.

The Cabinet Member for Finance, Councillor Jason Cummings, informed that the Period 1 financial report did not provide any accuracy in figures which was reliable to make predictions and thus it was better for reports to start at Period 2. The Director of Finance, Allister Bannin, shared with Cabinet the reason for the change in format within the report, highlighting that it was best for the quantifiable and non-quantifiable risks to be added within each directorate forecast to include in the narrative to review their position that included the risks and how it was being dealt with, and not hidden within the appendices.

The Executive Mayor in Cabinet **RESOLVED:**

- 1.1. To note the General Fund revenue budget outturn is forecast to breakeven at Period 2, after the forecast utilisation of £63m capitalisation directions requested from DLUHC and £3.8m of the corporate risk contingency budget. It is not planned in advance to utilise the risk contingency budget and directorates will work to bring the service directorate positions within budget.
- 1.2. To approve an increase to revenue expenditure budgets fully funded by new government funding for the Homelessness Prevention Grant (£1.9m) and Asylum Dispersal Scheme (£0.9m).
- 1.3. To note the progress in MTFs savings achievement as set out in paragraph 4.85.
- 1.4. To note the work that has commenced on the Council's Transformation Programme as set out from paragraph 4.81.
- 1.5. To note the Housing Revenue Account (HRA) revenue budget outturn is forecast to overspend by £1.7m.
- 1.6. To approve the net budget increase in 2023-24 General Fund and HRA capital programme budgets resulting from 2022-23 net slippage of £18.422m (GF) and £0.625m (HRA).
- 1.7. To approve a net budget increase to the 2022-26 General Fund capital programme budget of £1.541m (in addition to slippage), as set out in paragraph 4.101.

- 1.8. To note the General Fund capital programme 2023-24 forecast underspend of £0.040m against the revised capital budget (to be agreed by Council) of £144.332m.
- 1.9. To approve a budget increase to the 2022-26 HRA capital programme budget of £11.232m (in addition to slippage), as set out in paragraph 4.102.
- 1.10. To note the HRA capital programme 2023-24 forecast overspend of £4.073m against the revised capital budget (to be agreed by Council) of £33.248m.
- 1.11. To note the Council's historic legacy borrowing and debt burden continues to be critical to the sustainability of the Council's revenue budget. Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regards to its level of indebtedness and balancing the budget to ensure it can deliver sustainable local government services.
- 1.12. To note that the Council continues to operate Spend Control Panels to ensure that tight financial control and assurance oversight are maintained.
- 1.13. To note that current forecasts are based on the best available information at the time and will be subject to review and change during the financial year.

35/23

Parking Policy 2023

The Executive Mayor introduced the Parking Policy 2023 report which replaced the current policy for 2019-2022 to ensure the policy aligned with the needs and expectations of our residents, businesses, and partners.

The Cabinet Member for Street and Environment, Councillor Scott Roche, shared with Cabinet that the policy ambition was underpinned by the four quality drivers [Fair, Supportive, Efficient, and Transparent] to ensure it supported the Mayor's business plan. The parking policy was framed on five policies to deliver on the ambitions by (1) supporting the local economy, (2) appropriate parking management, (3) supporting disabled residents, (4) efficient service management, and (5) intelligence data led enforcement. The policy sets out the council's strategic approach to manage road space, responding fairly to customer needs.

The Shadow Cabinet Member for Street and Environment, Councillor Christopher Herman, noted the number of outstanding control parking zone petitions, and asked if the parking policy resolve this, and if the service as a whole achieved for residents what was required.

The Cabinet Member for Street and Environment, Councillor Scott Roche, confirmed that the parking policy would resolve and achieve what was required.

The Executive Mayor acknowledged and praised the Director of Sustainable Communities, Steve Iles, for the years of work and service he had contributed to the Council as he retired at the end of August.

The Executive Mayor in Cabinet **RESOLVED** to:

1.1. Note the priorities of the draft new parking policy to be fair, supportive, transparent and efficient as set out in Appendix A.

1.2. Delegate authority to the Corporate Director of Sustainable Communities, Regeneration and Economic Recovery, in consultation with the Executive Mayor, Cabinet Member for Streets & Environment and the Cabinet Member for Finance to:

1.2.1. Approve the draft Parking Policy for public consultation.

1.2.2. Adopt the Parking Policy taking into account the outcome of the consultation to ensure the policy addresses the needs of the community, whilst enabling the objectives of the Executive Mayor's Business Plan.

1.2.3. Develop the proposed action plan into a programme of initiatives to meet the objectives of the parking policy.

1.2.4 Recognise that the Parking Policy is a live document and in accordance with this to review and amend the policy periodically to ensure that it reflects the needs of the community and remains compliant with legislation.

36/23

Brick by Brick Croydon Ltd Update Report and Land Acquisition by HRA - July 2023

The Executive Mayor introduced the Brick by Brick Croydon Ltd Update Report and Land Acquisition by HRA July 2023 report, which described the progress made since the last update in November 2022.

This item included two confidential appendices relating Belgrave and Grosvenor – a legal paper and the valuation of the site.

The Cabinet Member for Finance, Councillor Jason Cummings, shared with Cabinet of the progress made which was significant as the number of outstanding issues minimised. There were a lot of detail within the report relating to sites and the progress of its current position. Further, the long-term implications relating to leaseholders, shared ownership, and other circumstances relating to the current tenants were to be cleared and clarified.

The Shadow Cabinet Member for Finance, Councillor Callton Young, welcomed the progress that had been made relating to Brick by Brick, and supported the principle of HRA as proposed in the recommendation but with the council's fiduciary and other duties referenced in paragraph 9.2 in the report.

The Cabinet Member for Finance, Councillor Jason Cummings, responded to the comments and noted that the progress had fit in with the financial projections in the MTF5 with no delay with receipt of money or risks to the financial forecast made.

The Executive Mayor thanked officers and Brick by Brick in resolving the longstanding issues and welcomed future updated reports.

The Executive Mayor in Cabinet **RESOLVED**: To

- 1.1. To note the progress on asset disposals and the financial position of Brick by Brick Croydon Ltd (BBB) since the last update report presented to Cabinet on 30th November 2022.
- 1.2. To approve that the Council under its Housing Revenue Account (HRA) purchase the freehold of the previous Printworks site on Portland Place in South Norwood for a consideration of £0.854m from BBB with the aim of the site being allocated for future housing regeneration opportunities in South Norwood.
- 1.3. To approve that the Council can vary the Belgrave and Grosvenor Option Agreement, subject to agreement with BBB, to include the ability to acquire the Belgrave & Grosvenor site for £1.217m all-inclusive of costs incurred by BBB.
- 1.4. To approve that once the variation to the Belgrave and Grosvenor Option Agreement has been agreed with BBB, the Council via its HRA can acquire the site from BBB with the aim of the site being allocated for future housing regeneration opportunities in South Norwood.
- 1.5. To delegate to the Corporate Director Resources and S151 Officer, in consultation with the Executive Mayor, Lead Member for Finance

and Director of Commercial and Property to acquire any asset (including land and property) from BBB subject to appropriate due diligence.

37/23

Lease Acquisition and Underlease Disposal at RedClover Gardens (Part A)

The Executive Mayor introduced the Lease Acquisition and Underlease Disposal at RedClover Gardens report, which provided details of a proposal to enter into a Headlease with Regen Capital for 85 units and subsequently underlease the units to a Registered Provider (RP) subsidiary of Mears Group to provide effective housing. The report further provided detailed examination of Regen's Capital's proposal, including an explanation of the financial benefits and the various options that were available to the Council when selecting an underlease.

This item included additional confidential information.

The Cabinet Member for Finance, Councillor Jason Cummings, shared with Cabinet of the opportunity for ongoing savings and ability to receive capital receipting via brick by brick. With the complications, there were no set up of separate companies, this was a more standard set up to produce a good end result for council and residents in temporary accommodation to being more suitable permanent homes.

The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne Hale, acknowledged the arrangement that the council would receive 85 affordable homes of 1 – 3 bedrooms properties.

The Shadow Cabinet Member for Finance, Councillor Callton Young, welcomed the paper and recommendations which was detailed well.

The Executive Mayor in Cabinet **RESOLVED:**

- 1.1. To approve that the Council enter into a Headlease with Regen Capital or an associated entity for 125 years of 85 units at the RCG development as detailed in this report, with lease payments over 50 years but with a 2 year rent free period at the start of the term of the Headlease and the option to buy the freehold interest for a £1 at the end of the 50th year of the term of the Headlease and to delegate authority to the Corporate Director of Housing in consultation with the Corporate Director of Resources, Lead Member for Finance and Lead Member for Housing to enter into final agreements subject to final financial and legal due diligence.
- 1.2. To approve that the Council enter into an Underlease with Mears or one of its subsidiaries for 10 years of 85 units at the RCG development as detailed in Sections 5 and 6 of this report and

delegate authority to the Corporate Director of Housing in consultation with Corporate Director of Resources, Lead Member for Finance and Lead Member for Housing to enter into final agreements subject to final legal due diligence.

- 1.3. To note that the proposal set out in this report can only progress once final funding is confirmed by Regen Capital, which is subject to financial funding rates and macroeconomic conditions that will be prevalent on the day of completion.
- 1.4. To delegate authority to the Corporate Director of Housing, in consultation with Corporate Director of Resources, the Executive Mayor, Lead Member for Finance and Lead Member for Housing, to renegotiate terms of the Headlease or Underlease, should this be required due to macroeconomic conditions prior to completion, but not to deviate by more than £2.00m from reported benefits of this proposal as set out within this report.
- 1.5. To note that the Council will receive 85 affordable housing units subject to the approval by the Council's Local Planning Authority to a variation of the existing S106 Planning Agreement, to provide much needed affordable homes which are currently being sourced from the private rental market at a premium.
- 1.6. To note subject to Recommendation 1.3 that the Council will hold 100% Nomination rights for all 85 affordable units for the period of the lease as (originally) required under the S106 Agreement entered into between the Council's planning authority and Brick by Brick Croydon Ltd, the developer (BBB).

38/23

Procurement of Architectural Professional Consultancy Services for Regina Road Project, South Norwood, and Malton House, to the Grant of Planning Permission and production of technical design for contractor procurement and on-site works (Part A)

The Executive Mayor introduced the Procurement of Architectural Professional Consultancy Services for Regina Road Project, South Norwood, and Malton House, to the Grant of Planning Permission and production of technical design for contractor procurement and on-site works report which aims to appoint architects and a supporting consulting team through a suitable framework that complied with Public Procurement Regulations.

This item included additional confidential information.

The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne Hale, informed Cabinet that the regeneration of Regina Road would procure a wide range of professionals via a suitable framework and the report sought approval to move ahead with the essential act.

The Executive Mayor in Cabinet **RESOLVED**:

- 1.1. To approve the procurement strategy contained within this report to appoint Architects and supporting consultant team via a suitable framework which is compliant with Public Procurement regulations to progress the Regina Road project, including the Malton House site. The scope of services is to progress the technical design and contract information required to enable the later procurement of a contractor/ developer to start on site.
- 1.2. To note the procurement actions already taken by the project team to appoint consultants using a waiver with Director's Delegation under the Council's Tenders and Contract Regulations to undertake key surveys.

39/23

Exclusion of the Press and Public

This was not required.

The meeting ended at 7:30pm

Agenda Item 5

LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE	27 September 2023	
REPORT TITLE:	STAGE 1: RECOMMENDATIONS ARISING FROM SCRUTINY	
LEAD OFFICER:	Jane West, Corporate Director for Resources Adrian May, Interim Head of Democratic Services T: 020 8726 6000 X 62529. Email: adrian.may@croydon.gov.uk	
LEAD MEMBER:	Councillor Rowenna Davis Chair, Scrutiny and Overview Committee	
AUTHORITY TO TAKE DECISION:	Recommendations that have been developed from the Scrutiny and Overview Committee and its Sub-Committees since the last Cabinet meeting are provided in the appendices to this report. The constitution requires that an interim or full response is provided within 2 months of this Cabinet meeting.	
KEY DECISION?	No	N/A
CONTAINS EXEMPT INFORMATION?	No	Public
WARDS AFFECTED:	All	

1. SUMMARY OF REPORT

- 1.1 This report presents recommendations to the Executive from Scrutiny following meetings of the Children & Young People Sub-Committee held on 27 June 2023, the Streets and Environment Sub-Committee held on 11 July 2023 and the Scrutiny & Overview Committee held on 25 July 2023.

2. RECOMMENDATIONS

- 2.1 The Executive Mayor has the power to make the decisions set out in the recommendations contained within this report. The Executive Mayor in Cabinet is asked to:
- 2.2 Receive the recommendations arising from the meetings of the Children & Young People Sub-Committee held on 27 June 2023 (Appendix 1), the Streets and Environment Sub-Committee held on 11 July 2023 (Appendices 2) and the Scrutiny & Overview Committee held on 25 July 2023 (Appendix 3).

- 2.3 To provide a substantive response to the recommendation (a Scrutiny Stage 2 Report) at the Cabinet meeting on 22 November 2023.

3 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 3.1 There is a statutory requirement for Cabinet to receive the recommendations made by Scrutiny.

4 BACKGROUND AND DETAILS

Children & Young People Sub-Committee – 27 June 2023

Item: Early Help, Children's Social Care and Education Dashboard

- 4.1 The Sub-Committee welcomed the positive movement in the dashboard, and the absence of red indicators.
- 4.2 The Sub-Committee concluded that for the next meeting an additional appendix would be added to this item, which provided a list of currently 'Red' indicators across the CYPE directorate KPIs to discuss with the relevant directors.

Streets & Environment Sub-Committee – 11 July 2023

Item: Parking Policy Transformation Project

- 4.3 The Sub-Committee were of the view that they would like to see strong communications from the Council when new enforcement initiatives were introduced and actions taken, as they felt that this would provide a good soft deterrent.
- 4.4 The Sub-Committee concluded that they would like to see strong engagement with disabled residents and disability-led organisations.
- 4.5 The Sub-Committee felt that there could be better feedback for residents who reported parking violations for enforcement as to the outcome of their report.
- 4.6 The Sub-Committee concluded that the existing map on the Council website that showed where CPZs were in the borough was not sufficient.
- 4.7 The Sub-Committee welcomed engagement with Croydon's district centres and were keen to see that none were missed.

Item: Consultation on the Local Flood Risk Management Strategy

- 4.8 The Sub-Committee welcomed the detailed report on the Local Flood Risk Management Strategy, and the hard work that had gone into developing it thus far.
- 4.9 The Sub-Committee were keen to encourage officers to investigate nature-based solutions to flood prevention.

- 4.10** The Sub-Committee were of the view that a year-round approach to publicity on flood prevention would be more effective than a campaign that only took place during the winter period.
- 4.11** The Sub-Committee concluded that publication of the Flood Risk Register on the Council's website would increase transparency and accessibility for residents.

Scrutiny & Overview Committee – 25 July 2023

Item: Financial Performance Monitoring – Month 2 2023-24

- 4.12** The Committee welcomed the reassurance given by the Cabinet Member for Finance on progress made with the Council's Transformation Programmes and noted that the first quarterly Transformation Monitoring report was due to be considered at the Cabinet meeting on 27 September 2023.
- 4.13** Although it was accepted that some of the factors involved were not unique to Croydon and were either London-wide or national challenges, the Committee concluded that the vacancy rates within certain services of the Council presented a considerable risk to the delivery of both business-as-usual services and transformation programmes.

Item: Equalities Strategy Refresh

- 4.14** The Committee welcomed confirmation that the Equalities Impact Assessment was being refreshed and endorsed the approach of requiring the equalities implications of a decision to be assessed at an early stage in the decision-making process, rather than being left to a later stage when it could be more challenging to meaningfully take account of the potential equalities' implications.
- 4.15** The Committee welcomed confirmation that the Equalities Strategy Action Plan would focus on measurable outcomes using SMART targets, which ensure that its success could be assessed.

Item: Scrutiny Recommendations

- 4.16** Arising from its discussion with the Executive Mayor at previous meeting on 6 June 2023, The Scrutiny & Overview Committee welcomed the sharing of the feedback received from the Department of Levelling-Up, Housing and Communities on the Council's bid for Levelling-Up funding and noted it reflected positively on the bid submitted.

5 ALTERNATIVE OPTIONS CONSIDERED

- 5.1** Scrutiny meetings do not necessarily result in any recommendations to the executive.

6 CONSULTATION / PRE-DECISION SCRUTINY

- 6.1** The recommendations were developed from the deliberations of either the Scrutiny & Overview Committee or one of its Sub-Committees.

7 CONTRIBUTION TO COUNCIL PRIORITIES

- 7.1** Outcome 1: The Council balances its books, listens to residents and delivers good sustainable services:

Priority 4: Ensure good governance is embedded and adopt best practice The Council must learn the lessons of past failures and embed sound governance processes to ensure that decision-making is transparent, open and honest. These must ensure effective control of our projects and programmes and encourage meaningful scrutiny and challenge.

8 IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

- 8.1.1** The Scrutiny recommendations to the Executive may have financial implications. Following the recommendations being received at Cabinet, the Executive will identify and consider any financial implications as part of their response.
- 8.1.2** If any recommendation is subsequently progressed for consideration and decision by the Executive Mayor in Cabinet, full financial (as well as legal and equalities implications) would be presented.

8.2 LEGAL IMPLICATIONS

- 8.2.1** Under Section 9F Local Government Act 2000 ("The Act"), Scrutiny and Overview Committee (SOC) have the powers to review or scrutinise decisions made, or other action taken in connection with the discharge of any executive and non-executive functions and to make reports or recommendations to the executive or to the authority with respect to the discharge of those functions. SOC also has the power to make reports or recommendations to the executive or to the authority on matters, which affect the authority's area or the inhabitants of its area.
- 8.2.2** Under Section 9FE of the Act, there is a duty on Cabinet to respond to the scrutiny report, indicating what (if any) action Cabinet proposes to take, within 2 months of receiving the report and recommendations.
- 8.2.3** Approved by Sandra Herbert, Head of Litigation & Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer

8.3 HUMAN RESOURCES IMPLICATIONS

8.3.1 There are no human resource implications arising directly from the contents of this report

8.4 EQUALITIES IMPLICATIONS

8.4.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Sec 149 of the Equality Act 2010. The Council must, in the performance of its functions, therefore, have due regard to:

- i. eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
- ii. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- iii. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.4.2 The recommendations in the appendices to this report have equality implications and will require an EQIA as part of the development of the proposals. The implications will be explored to identify impact and mitigation utilised to negate any adverse impact where necessary.

8.4.3 Approved by: Naseer Ahmad for Denise McCausland Equality Programme Manager

8.5 ENVIRONMENTAL IMPLICATIONS

8.5.1 There are no environmental implications arising directly from the contents of this report, the report received recommendations from scrutiny, but no decision for recommendation.

8.6 CRIME AND DISORDER REDUCTION IMPLICATIONS

8.6.1 There are no crime and disorder implications arising directly from the contents of this report, the report received recommendations from scrutiny, but no decision for recommendation.

8.7 DATA PROTECTION IMPLICATIONS

8.7.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

There are no Data Protection implications at this stage, but that the situation will be reviewed again at Stage 2 when Cabinet provide their response to the proposed recommendations.

HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

NO

9 APPENDICES

Appendix 1 – Scrutiny Stage 1: Recommendations from Children & Young People Sub-Committee - 27 June 2023

Appendix 2 – Scrutiny Stage 1: Recommendations from Streets and Environment Sub-Committee - 11 July 2023

Appendix 3 – Scrutiny Stage 1: Recommendation from Scrutiny & Overview Committee - 25 July 2023

10 BACKGROUND DOCUMENTS

Meeting of the Children & Young People Sub-Committee held on 27 June 2023
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=167&MId=3502>

Meeting of the Streets and Environment Sub-Committee held on 11 July 2023
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=170&MId=3506>

Meeting of the Scrutiny & Overview Committee on 25 July 2023
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=3511>

Appendix 1 – Recommendations arising from Children & Young People Sub-Committee; 27 June 2023

Item: Early Help, Children's Social Care and Education Dashboard

Recommendation Number	Recommendation	Political Lead	Officer Lead
CYP.1.23/24	The Sub-Committee recommended that the narrative on future versions of the Early Help, Children's Social Care and Education Dashboard report looked to identify where indicators were linked or interdependent, to ensure Members had a fuller understanding of these.	Cllr Maria Gatland - CYP	Debbie Jones

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Appendix 2 – Recommendations arising from Streets & Environment Sub-Committee; 11 July 2023

Item: Parking Policy Transformation Project

Recommendation Number	Recommendation	Political Lead	Officer Lead
SE.5.23/24	The Sub-Committee recommends that 'Letter Drops', or similar targeted communications, on Parking Policy are undertaken in District Centres that had not already been engaged or are not being actively engaged through local Business Improvement Districts before any changes to Parking Policy are enacted.	Councillor Scott Roche	Jayne Rusbatch
SE.6.23/24	The Sub-Committee recommends that an improved parking map is developed for the Council website, which included Controlled Parking Zones and Restricted Parking Areas.	Councillor Scott Roche	Jayne Rusbatch
SE.7.23/24	The Sub-Committee recommended that a Task Group was established for engaging with disabled residents and disabled-led organisations (such as Transport for All) on parking policy, to ensure that disabled parking bays were best placed on the road for users and that roads and footways were accessible, as part of the work for Policy three - 'Supporting our Disabled Residents'.	Councillor Scott Roche	Jayne Rusbatch

SE.8.23/24	The Sub-Committee recommends that a process is put in place to provide follow-up communication on the outcome, to residents who reported parking for enforcement action through the parking hotline or 'Love Clean Streets' app.	Councillor Scott Roche	Jayne Rusbatch
SE.9.23/24	The Sub-Committee recommends that there is comprehensive communications planned with residents should areas transition from parking meters to cashless parking, including a full publicity campaign and video walk-through.	Councillor Scott Roche	Jayne Rusbatch

Item: Consultation on the Local Flood Risk Management Strategy

Recommendation Number	Recommendation	Political Lead	Officer Lead
SE.10.23/24	The Sub-Committee recommends that steps be taken to publish the Flood Risk Register on the Council's website to ensure that this was transparent and accessible to residents.	Councillor Scott Roche	Steve Iles
SE.11.23/24	The Sub-Committee recommends the implementation of a publicly accessible Geographic Information System (GIS) for Croydon.	Councillor Scott Roche	Steve Iles
SE.12.23/24	The Sub-Committee recommends that the expertise of an arborist be sought, to feed into the Local Flood Risk Management Strategy, and that more thought should be put into how 'Blue and Green corridors' can be expanded, alongside other nature based solutions, to provide additional flood prevention measures using existing grant funding available to the Council.	Councillor Scott Roche	Steve Iles

SE.13.23/24	The Sub-Committee recommends that the Council implement a year-round publicity campaign on flood prevention, as it felt that beginning publicity in the winter would reduce its effectiveness.	Councillor Scott Roche	Steve Iles
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Appendix 3 – Recommendations arising from Scrutiny & Overview Committee; 25 July 2023

Item: Financial Performance Monitoring: Month 2 2023-24

Recommendation Number	Recommendation	Political Lead	Officer Lead
SOC.8.23/24	The Scrutiny & Overview Committee would like to recommend that the letters sent to residents regarding Council Tax arrears are reviewed to ensure they include information about the potential availability of support schemes, such as the Council Tax Hardship Scheme.	Councillor Jason Cummings	Allister Bannin

Item: Equalities Strategy Refresh

Recommendation Number	Recommendation	Political Lead	Officer Lead
SOC.9.23/24	The Scrutiny & Overview Committee recommends that there is further consideration given to how the refreshed Equalities Strategy can reflect the intersectionality between protected characteristics.	Councillor Andy Stranack	David Courcoux
SOC.10.23/24	In order to improve accountability for the delivery of the Equalities Strategy, the Scrutiny & Overview Committee recommends that a process for holding regular challenge sessions with those officers responsible for specific actions/workstreams within the Strategy is developed as part of the ongoing monitoring of delivery.	Councillor Andy Stranack	David Courcoux

SOC.11.23/24	<p>3. The Scrutiny & Overview Committee agreed with the proposal of the Cabinet Member and Officers, that given its scope, the Equalities Strategy should have a longer term end date, but recommends that: -</p> <p>a) key review points are built into the Strategy at appropriate intervals to allow for adjustments and the opportunity to refocus as needed.</p> <p>b) it is sufficiently dynamic to take account of any new initiatives or legislation that may arise over its lifespan.</p>	Councillor Andy Stranack	David Courcoux
SOC.12.23/24	The Scrutiny & Overview Committee recommends that consideration is given to embedding Equalities Champions within directorates to complement existing structures and systems within the Council aimed at promoting equalities and inclusivity.	Councillor Andy Stranack	David Courcoux

Item: Scrutiny Recommendations

Recommendation Number	Recommendation	Political Lead	Officer Lead
SOC.13.23/24	The Scrutiny & Overview Committee recommends that the Mayor publishes the feedback received from the Department for Levelling-Up, Housing and Communities on the Council's bid for Levelling-Up funding.	Mayor Jason Perry	Nick Hibbard

Agenda Item 6

LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE	27 September 2023	
REPORT TITLE:	Scrutiny Stage 2 Responses to Recommendations arising from: Scrutiny & Overview Committee held 22 May 2023 (Appendices 1 & 2) and 6 June 2023 (Appendix 3); and Streets & Environment Sub-Committee held on 14 March 2023 (Appendices 4 & 5)	
LEAD OFFICER:	Jane West, Corporate Director for Resources Adrian May, Interim Head of Democratic Services T: 020 8726 6000 X 62529. Email: adrian.may@croydon.gov.uk	
LEAD MEMBER:	Councillor Rowenna Davis Chair, Scrutiny and Overview Committee	
AUTHORITY TO TAKE DECISION:	<p style="text-align: center;">The Constitution requires that in accepting a recommendation, with or without amendment, from a Scrutiny and Overview Committee or Sub-Committee, the Executive Mayor shall agree an action plan for the implementation of the agreed recommendations and shall delegate responsibility to an identified officer to report back to the Scrutiny and Overview Committee or Sub-Committee, within a specified period, on the progress made in implementing the action plan.</p>	
KEY DECISION?	No	N/A
CONTAINS EXEMPT INFORMATION?	No	Public
WARDS AFFECTED:	All	

1 SUMMARY OF REPORT

1.1 This report invites the Executive Mayor to approve the full response reports arising from the Stage 1 reports presented to the Cabinet meeting held on 28 June 2023, including:

- Action plans for the implementation of agreed recommendations, or
- Reasons for rejecting the recommendations.

and that these be reported to the Scrutiny and Overview Committee or relevant Sub-Committees.

- 1.2** The Constitution requires that in accepting a recommendation, with or without amendment, from a Scrutiny and Overview Committee or Sub-Committee, the Executive Mayor shall agree an action plan for the implementation of the agreed recommendations and shall delegate responsibility to an identified officer to report back to the Scrutiny and Overview Committee or Sub-Committee, within a specified period, on the progress made in implementing the action plan.

2 RECOMMENDATIONS

- 2.1** The Executive Mayor, in Cabinet, has the power to make the decisions set out in the recommendation below:

To approve the response and action plans attached to this report at Appendix A and that these be reported to the Scrutiny and Overview Committee or relevant Sub-Committees.

3 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 3.1** These are contained in the appendix to this report.

4 SCRUTINY RECOMMENDATIONS

- 4.1** The Scrutiny recommendations are set out in the appendices to this report.
- 4.2** The detailed responses, including reasons for rejected recommendations and action plans for the implementation of agreed recommendations are also contained in these appendices.

5 ALTERNATIVE OPTIONS CONSIDERED

- 5.1** These are contained in the appendices to this report.

6 CONSULTATION / PRE-DECISION SCRUTINY

- 6.1** The recommendations have been developed following the deliberations of either the Scrutiny and Overview Committee or one of its Sub-Committees.
- 6.2** The recommendations in the appendices to this report may involve further consultation and as each recommendation is developed, these implications will be explored and approved.
- 6.3** Some of the recommendations in the appendices to this report are the result of Pre-Decision Scrutiny.

7 CONTRIBUTION TO COUNCIL PRIORITIES

- 7.1** Outcome 1: The Council balances its books, listens to residents and delivers good sustainable services:

Priority 4: Ensure good governance is embedded and adopt best practice The Council must learn the lessons of past failures and embed sound governance processes to ensure that decision-making is transparent, open and honest. These must ensure effective control of our projects and programmes and encourage meaningful scrutiny and challenge.

8 IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

- 8.1.1** The recommendations set out in the appendices to this report may have a financial implication and as each recommendation is developed the financial implication will be explored and approved.

8.2 LEGAL IMPLICATIONS

- 8.2.1** Under Section 9F Local Government Act 2000 (“The Act”), Scrutiny and Overview Committee (SOC) have the powers to review or scrutinise decisions made, or other action taken in connection with the discharge of any executive and non-executive functions and to make reports or recommendations to the executive or to the authority with respect to the discharge of those functions. SOC also has the power to make reports or recommendations to the executive or to the authority on matters, which affect the authority’s area or the inhabitants of its area. To discharge this scrutiny function, SOC has appointed Scrutiny Sub-Committees, which includes Streets & Environment (S&E) Sub-Committee. Pursuant to the above provision, S&E Sub-Committee has made a recommendation arising from its scrutiny of the budget areas under its remit, which is set out in the attached appendix.
- 8.2.2** Under Section 9FE of the Act, there is a duty on Cabinet to respond to the scrutiny report, indicating what (if any) action Cabinet proposes to take, within 2 months of receiving the report and recommendations.
- 8.2.3** *Approved by:* Sandra Herbert, Head of Litigation and Corporate Law for and on behalf of Stephen Lawrence-Orumwense, Director of Legal Services and Monitoring Officer (24/8/2023).

8.3 HUMAN RESOURCES IMPLICATIONS

8.3.1 The recommendations in the appendix to this report may have a Human Resources impact and as each recommendation is developed these implications will be explored and approved.

8.4 EQUALITIES IMPLICATIONS

8.4.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Sec 149 Equality Act 2010. The Council must, in the performance of its functions, therefore, have due regard to:

1. eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
2. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
3. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.4.2 The recommendations set out in the appendices of this report have equality implications and will require an EQIA as part of the development of the proposals. The implications will be explored to identify impact and mitigation utilised to negate any adverse impact where necessary.

8.4.3 Comment approved by: Naseer Ahmad on behalf of Equalities Manager, (25/08/2023)

8.5 ENVIRONMENTAL IMPACT

8.5.1 The recommendations set out in the appendices of this report may have an Environmental impact and as each recommendation is developed, these implications will be explored and approved.

8.6 CRIME AND DISORDER REDUCTION IMPACT

8.6.1 The recommendations set out in the appendices of this report may have a Crime and Disorder reduction impact and as each recommendation is developed, these implications will be explored and approved.

8.7 DATA PROTECTION IMPLICATIONS

8.7.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

The recommendations set out in the appendices of this report may involve the processing of 'personal data' and as each recommendation is developed, these implications will be explored and approved.

8.7.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

NO

The recommendations set out in the appendices of this report may require a DPIA and as each recommendation is developed, these implications will be explored and a DPIA carried out where necessary.

9 APPENDICES

9.1 Appendix 1 – Scrutiny Stage 2 Responses: Recommendations from Scrutiny & Overview Committee, Item: Month 11 Financial Performance Monitoring Report 2023-24, 22 May 2023

Appendix 2 – Scrutiny Stage 2 Responses: Recommendations from Scrutiny & Overview Committee, Item: Month Annual Asset Disposal Plan 2023-24, 22 May 2023

Appendix 3 – Scrutiny Stage 2 Responses: Recommendations from Scrutiny & Overview Committee, Item: Executive Mayor of Croydon – Scrutiny Update, 6 June 2023

Appendix 4 – Scrutiny Stage 2 Responses: Recommendations from Streets & Environment Sub-Committee, Item: Waste, Recycling and Street Cleansing Contract Specification, 14 March 2023

Appendix 5 – Scrutiny Stage 2 Responses: Recommendations from Streets & Environment Sub-Committee, Item: Local Planning Authority Service Transformation, 14 March 2023

10 BACKGROUND DOCUMENTS

10.1 Agenda for the meeting of the Scrutiny & Overview Committee held on 22 May 2023
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=3657&Ver=4>

Agenda for the meeting of the Scrutiny & Overview Committee held on 6 June 2023
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=3510&Ver=4>

Agenda for the meeting of the from Streets & Environment Sub-Committee held on 14 March 2023
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=170&MId=2947&Ver=4>

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Appendix 1 – Item: Month 11 Financial Performance Monitoring Report 2023-24

Considered by Scrutiny & Overview Committee on 22 May 2023

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
SOC.3.23/24	The Scrutiny & Overview Committee recommends that, given the precarious nature of the Council's finances, the process for publishing monthly Financial Performance Monitoring reports is sped up, with the aim of achieving a maximum turnaround of eight week to finalise checks and go through the sign-off process before publication.	Councilor Jason Cummings Resources	<p>Rejected</p> <p>The process time for preparing accurate forecasts after the end of a period and allowing for the quality assurance stages of CMT and MAB do not allow the Council to be able to commit to a maximum turnaround of eight weeks. However, a new webpage has been added to the Council's internet site for "Corporate Performance and Finance Reporting" (https://www.croydon.gov.uk/council-and-elections/council-leadership-committees-and-meetings/committees-boards-and-meetings/corporate-performance-and-finance-reporting). The monthly Financial Performance reports are now published as soon as they are signed off by the Executive Mayor, rather than waiting to be published with the Cabinet papers. This allows for more timely viewing by the public and Scrutiny & Overview Committee.</p>	Jane West, Corporate Director of Resources & S151 Officer	N/A	The Corporate Performance and Finance Reporting webpage on the Council's website has been set up and monthly finance reports since Month 10 of 2022-23 have been uploaded.	TBC

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Appendix 2 – Item: Annual Asset Disposal Plan 2023-24

Considered by Scrutiny & Overview Committee on 22 May 2023

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
SOC.4.23/24	The Scrutiny & Overview Committee recommends that the process of adding assets to the disposal list should, as a minimum, include notifying ward councillors and where those assets are in use or occupied, there should be active engagement with ward councillors, and where appropriate the local community, to understand and manage the local implications of the sale..	Councillor Jason Cummings Resources	<p>Rejected</p> <p>These assets are proposed for disposal following a process of review approved by Cabinet.</p> <p>All councillors are informed of the asset disposals being proposed for the Mayor to approve in Cabinet when the Cabinet reports are circulated.</p> <p>Where assets are in use, attempts are made to inform occupiers in advance of the Cabinet papers being published.</p>	Jane West, Corporate Director of Resources & S151 Officer	N/A	Completed	TBC
SOC.5.23/24	The Scrutiny & Overview Committee recommends that any users of assets are notified as soon as possible after they have been agreed for disposal by the Mayor, to allay any anxiety about the uncertainty on the future of their service and to give them the opportunity to present any business case that may be in the long term financial and public interests of the Council.	Councillor Jason Cummings Resources	<p>Rejected</p> <p>The Council already notifies current tenants of the intention to sell properties which are being sold without vacant possession and as a going concern</p>	Jane West, Corporate Director of Resources & S151 Officer	N/A	Completed	TBC

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Appendix 3 – Item: Executive Mayor of Croydon – Scrutiny Update

Considered by Scrutiny & Overview Committee on 6 June 2023

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
SOC.6.23/24	The Committee welcomed confirmation from the Mayor that performance indicators to track the delivery of Mayor's Business Plan would be forthcoming, the Committee recommends that consideration be given to indicators so that they clearly demonstrate the tangible benefits delivered for residents as a result of the Plan.	Executive Mayor Jason Perry	Rejected - Already in progress The updated suite of performance indicators aligned to the Mayor's Business Plan will be shared with the Scrutiny Committee for consideration prior to adoption at Cabinet. The development of the new performance framework is in progress and the indicators have been designed to reflect outcomes for residents wherever possible.	Katherine Kerswell, Chief Executive and Head of Paid Service	N/A	Performance against the corporate performance indicators will be reported to Cabinet on a quarterly basis.	26 th September 2023
SOC.7.23/24	The Committee understood the open-ended nature of the consultation process for Public Space Protection Orders to report concerns so residents would continue to do this, but also felt that a current timeline / deadline be provided, perhaps of six months after its enactment, to give residents clarity about when the scheme would be reviewed and potentially amended.	Councillor Ola Kolade SCRER	Partially Accepted – A 2-month review was outlined in the Cabinet report and decision to implement, and this is currently underway. There will then be a review on a 6-monthly basis.	Kristian Aspinall, Director of Culture & Community Safety	N/A	N/A	TBC

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Appendix 4 – Item: Waste, Recycling and Street Cleansing Contract Specification

Considered by Streets & Environment Sub-Committee on 14 March 2023

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
SE.1.23/24	The Sub-Committee recognised there was a large number of households in the Borough that used communal bins and recommends that the specification of the Waste, Recycling and Street Cleansing contract includes a requirement for identifying a successful solution for managing waste and recycling collections from these properties.	Councillor Scott Roche SCRER	Rejected The draft specification already sets out that the collection of communal flats collection is an individual service requirement within the contract specification. One of the advantages of Competitive Dialogue is that it allows the Service to discuss areas of innovation and service enhancements from individual bidders. It is important to note that as a 'minimum service' requirement will be to maintain the current weekly collection from all communal collection points.	Steve Iles, Director of Sustainable Communities	This is dependent on the final solution agreed through the procurement process.	April 2025	TBC
SE.2.23/24	The Sub-Committee recommends that the Council plans some specific actions to help resident engagement, communication and behavioural change under the new waste contract, using data to ensure the borough's recycling rates are maximised and that residents get the most out of the contract.	Councillor Scott Roche SCRER	Rejected – This is already built into the future draft specification. The service recognises the importance of targeted regular engagement and communication with our residents. To ensure that this is undertaken in line with the Council's priorities, the future contract will require the service provider to direct real-time data which can be extracted and analysed by our waste services team. In addition, under the future contract requirements the service provider will be required to 'support' our agreed engagement and communication initiatives which will be led by the Councils Communication Team who will be directly responsible for the design and implementation of all future engagement and communication strategies designed to deliver behavior change and increase our recycling.	Steve Iles, Director of Sustainable Communities	Yes – As part of the overall financial cost in providing the new waste collection and street cleansing service we will need to include the new additional cost of the Council's resource and budget requirement to undertake this area of work.	April 2025	TBC

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
SE.3.23/24	The Sub-Committee recommends that there was a continuation of an 'as-is' service for residents in terms of a collection frequency.	Councillor Scott Roche SCRER	Rejected In line with Cabinet recommendations, the new Service Specification and supporting contract have been drafted to reflect the current frequency for waste collection.	Steve Iles, Director of Sustainable Communities	Yes – It is acknowledged that the new waste collection service is likely to be more expensive and is likely to be above the current Budget provision allocated for 2025/26.	The commissioning of the new service is scheduled to be completed in Q4 2023/24. Preferred Bidder status is subject to Cabinet Approval in May/June 2024. The new contract is scheduled to be in place in April 2025	TBC

Appendix 5 – Item: Local Planning Authority Service Transformation

Considered by Streets & Environment Sub-Committee on 14 March 2023

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
SE.4.23/24	The Sub-Committee recommended that Councillors be invited to attend future Planning Resident Engagement events.	Councillor Jeet Bains SCRER	Accepted Members will be sent invites directly to future Resident Association meetings. Previously Members have been invited to attend these meetings through the Party Whips.	Heather Cheesbrough , Director of Planning & Sustainable Regeneration	N/A	Immediate	TBC

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LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	27th September 2023	
REPORT TITLE:	A Public Spaces Protection Order (PSPO) in Croydon Thornton Heath	
CORPORATE DIRECTOR / DIRECTOR:	<p style="text-align: right;">Nick Hibberd</p> <p>Corporate Director of Sustainable Communities, Regeneration & Economic Recovery</p> <p style="text-align: right;">Kristian Aspinall</p> <p style="text-align: right;">Director Culture & Community Safety</p>	
LEAD OFFICER:	<p style="text-align: right;">Christopher Rowney</p> <p>Head of the Violence Reduction Network christopher.rowney@croydon.gov.uk</p>	
LEAD MEMBER:	<p style="text-align: right;">Councillor Ola Kolade</p> <p>Cabinet Member for Community Safety</p>	
KEY DECISION?	Yes	<p style="text-align: right;">Decision number = 3523EM</p> <p>- Significantly impacts on communities living or working in an area comprising two or more wards</p>
CONTAINS EXEMPT INFORMATION?	NO	Public
WARDS AFFECTED:	Bensham Manor, Thornton Heath, Selhurst, South Norwood <i>West Thornton</i>	

1. SUMMARY OF REPORT

- 1.1 Implementation of a Public Spaces Protection Order (PSPO) in Thornton Heath and surrounding areas. This will support the delivery of the Executive Mayor's business plan priority for Croydon to be a cleaner, safer and healthier place by providing the Police with additional powers to address the behaviour being exhibited.

2. RECOMMENDATIONS

For the reasons set out in the report, the Executive Mayor in Cabinet is recommended:

- 2.1 to consider the outcome of the statutory consultation on the proposed Public Spaces Protection Order (PSPO) in and around the geographical area of Thornton Heath;
- 2.2 to note the strong support for the proposal with over 78% of respondents agreeing with the need for a PSPO in and around the geographical area of Thornton Heath;

- 2.3 having due regard to the outcome of the statutory consultation and in the light of the consideration of the equalities matters and the public sector equality duty detailed in this report to approve the making of the PSPO covering the geographical area in and around Thornton Heath for a term of three years and in accordance with the draft Order set out in Appendix D;
- 2.4 to approve the process for the implementation of the PSPO in and around the geographical area of Thornton Heath.

3. REASONS FOR RECOMMENDATIONS

- 3.1 Outcome four of the Executive Mayor's business plan centres on Croydon being a cleaner, safer and healthier place, "a borough we're proud to call home". A key priority is tackling anti-social behaviour, knife crime and violence against women and girls so that Croydon feels safer. Introducing a PSPO will help to crack down on an ASB hotspot by providing the Police with additional powers to address the behaviour being exhibited.
- 3.2 In January 2022, the Safer Croydon Partnership produced their Community Safety Strategy. One theme identified in the strategy was to "*Focus on high priority neighbourhoods*" and was based on the findings of the Strategic Assessment of 2021.
- 3.3 As explained in the report, Thornton Heath has been highlighted as an area for further investigation.
- 3.4 The Council has a duty to do all that it reasonably can to prevent crime and disorder in its area and to work towards delivering the objectives of the Safer Croydon Partnership Plan. The implementation of any PSPO assists the Council in meeting this duty by providing the Council and Police with additional powers to tackle the issues identified.

4. PSPO proposals

- 4.1 The original PSPO that was implemented in 2017 covered a very small area in the centre of Thornton Heath. It lapsed in 2020. Due to the small area covered, it did not effectively tackle the anti-social behaviour in the area.
- 4.2 The new PSPO proposal was based on the available police data at the time as per the legal requirements for new PSPOs. Any proposed PSPO must follow the data available to be legally justifiable. Following the removal of access to police systems for local authority officers across London as a whole, we had to work off the available ward-based data at the time. The proposed area was significantly larger than the previous lapsed PSPO and was drawn as large as could be legally justified through the data we had access to.
- 4.3 Given the restrictions and limitations of the data available at the time, we specifically ensured that the consultation process would allow us to capture more data and evidence to ensure the area covered was appropriate. Following consultation, we committed to changing the area covered if this was justified through the consultation process. We are proposing further changes to the areas covered, and this is outlined in 4.16 onwards.

5. PSPO CONSULTATION

5.1 The PSPO Cabinet report approved by Cabinet in May 2023, stated that the Council would conduct a formal 6-week consultation to enable Croydon's residents and visitors to feedback on a PSPO covering a geographical area in and around Thornton Heath.

5.2 All available Council communication channels were used to promote the consultation. This included a link on the Council's webpage ([Proposal to introduce a Public Space Protection Order \(PSPO\) in Thornton Heath | Get Involved Croydon](#)) which received over 2,100 visits. Emails were sent to statutory consultees as well as emails and reminder emails to our community group distribution list. A press release and news story on news.croydon.gov.uk had 543 views, and social media posts were as follows:

Twitter – 7 posts received a total of 20,857 impressions

Facebook – 8 posts received a total of 6,164 impressions

Instagram – 4 posts received a total of 4,026 impressions

5.3 The consultation was included in two editions of the Council's weekly "Your Croydon" bulletin that went out to over 80,000 email addresses. There was an article on the staff intranet and included in the staff "Our Croydon" bulletin. It was also published in four editions of the council's business bulletin that was circulated to over 7,098 businesses.

5.4 As part of the consultation, the Director of Culture and Community Safety met with local Ward Councillors in the wards affected to discuss the PSPO and its implications.

MAIN FINDINGS FROM THE PSPO CONSULTATION

5.5 There were a total of 551 respondents to the consultation.

5.5 78% strongly agreed with the need for a PSPO in Thornton Heath and its surrounding area. Only 11% strongly disagreed.

5.6 76% of respondents had experienced people harassing or intimidating residents, businesses, or members of the public. 20% had not experienced this.

5.7 80% of respondents had experienced people using threatening or intimidating behavior including verbal abuse. 17% had not.

5.8 90% of respondents had experienced people street drinking. Only 10% had not.

5.9 83% of respondents had experienced people acting in an antisocial manner that causes harassment, alarm, or distress. 15% had not.

5.10 78% of respondents had experienced two or more people acting in a manner likely to cause harassment, alarm, or distress. 18% had not.

5.11 75% of respondents had experienced people urinating in a public place. 24% had not.

5.12 63% strongly agreed with the proposed area for the PSPO. 14% strongly disagreed.

- 5.13 In summary, a large majority of respondents agreed there is an antisocial behavior problem in Thornton Heath and support implementing a PSPO. The most experienced issues were public drinking, verbal abuse/harassment, and urinating in public.
- 5.14 Please refer to Appendix A for a summary of the Public Spaces Protection Order Consultation Results.

KEY ISSUES RAISED

- 5.15 Throughout the consultation there were several key themes that emerged.
- 5.16 The main issue raised was increasing the PSPO to cover Thornton Heath Pond. The legislation states that the Police are a statutory partner that must be consulted to implement a PSPO. The Local Policing Team stated, "*The extension of the PSPO has the full support from the teams due to the fluidity of movement of the individuals who the PSPO is designed to displace from Bensham Manor and Thornton Heath. By excluding The Ponds we will simply be relocating to an area which they already use... A PSPO will enable officers and ASB council teams to move individuals who are drinking before antisocial behaviour takes place and address the issues that local residents are reporting.*" Please refer to Appendix B for the Police feedback that was provided.
- 5.17 During the consultation, many respondents also stated that that the PSPO should cover the area of Thornton Heath Pond stating that there is "*daily ASB at the Pond*".
- 5.18 It was also stated that Grangewood Park was only half covered in the proposed PSPO map, with feedback including that "the whole of Grangewood park needs to be included".
- 5.19 As a result of the feedback provided by the Local Policing team, residents, and feedback from the consultation, further consultation was sought from the statutory partners in relation to the additional areas. Section 72 states that consultation should take place with the chief officer of police, and the local policing body, for the police area that includes the restricted area as well as the owner or occupier of land within the restricted area.
- 5.20 We are therefore proposing that the PSPO should be increased to include Thornton Heath Pond and the entirety of Grangewood park.
- 5.21 The Local Policing team have now provided the relevant information to satisfy the requirements to include Thornton Heath Pond in the PSPO. The Police believe it is proportionate for the area to be covered because the behaviour taking place is having a detrimental effect on the quality of life for those in the locality and that it is likely that activities will continue. Please refer to Appendix B.
- 5.22 In relation to the park, the Local Policing team would find it difficult to enforce only half of the park and to differentiate between areas within or outside of the PSPO boundary as originally drawn up. If only half of the park was included there is a risk that the boundary could be misunderstood. Increasing the coverage to the entirety of the park assists in removing misunderstanding for residents as well as the Police.

- 5.23 A large number of residents have stated in their consultation feedback that they have experienced anti-social behaviour, but they do not identify the specific areas within the park where they experience it. The Council's Parks team has provided the following comments, *"I strongly support the idea of extending the PSPO to cover the entire park. Over the last couple of months there has been a remarkable increase of antisocial behaviour at Grangewood Park, I received reports of park furniture being damaged (e.g. two benches set alight in the last 2 weeks), parks features being vandalised, alcohol related activities taking place in the newly refurbished playground and uncontrolled dogs roaming the park. Covering half of the park will only create confusion and undermine the intention of the proposed PSPO making really difficult for the police to assist the council with any problem arising in the future."* A copy can be found in Appendix E.
- 5.24 The Local Policing team has provided further comment in relation to Grangewood Park at Appendix F.
- 5.25 The PSPO map has been amended to include the areas highlighted during the consultation such as Grangewood Park and Thornton Heath Pond. Please refer to Appendix C for the proposed PSPO map.
- 5.26 A PSPO order may be challenged if the required consultation had not been complied with and that is why further information was sought from the required statutory consultation partners in relation to areas that were identified by residents, partners, and consultation results.
- 5.27 The feedback we received related to increasing the PSPO area to incorporate surrounding areas. Should the PSPO be implemented with the boundaries adjusted as proposed, a review of the area will take place to ensure that displacement is not occurring. The order can be amended to increase the area covered by the PSPO should direct displacement occur. The Partnership will continue to monitor the areas identified as hotspots for crime and anti-social behaviour. Ongoing issues in ASB and Crime hotspots are discussed at the monthly Joint Agency Group (JAG) meeting. The JAG is the medium-term operational arm of the Safer Croydon Partnership (SCP). It is a multi-agency intelligence-led local partnership focused on anti-social behaviour and related crime and disorder. It deals with the threat, risk and harm to local communities and local people, identifying and tackling crime and anti-social behaviour through collaborative problem-solving.
- 5.28 Previously, services have visited the areas to identify individuals and signpost them to relevant services. The Local Policing team, Housing Providers and Youth Engagement Service, as well as the Substance and Alcohol Misuse team, have all conducted visits to some of the areas identified.
- 5.29 Consultation feedback highlighted that drug dealing and drug use is a concern to residents and businesses. The Police will continue to deal with criminal offences such as drug dealing. The PSPO would not replace their powers but provide the Police with additional measures.

PARTNERSHIP

- 5.30 As part of the consultation, various community organisations were invited to respond to the consultation in their own name, on behalf of their members.

NEXT STEPS

5.31 Given the results of the consultation, it is proposed to proceed with the making of a PSPO. The proposed PSPO is set out in Appendix D. It is considered that the prohibitions and requirements proposed in the PSPO are reasonable and proportionate and are targeted at the specific activities and behaviours which are causing nuisance and harm. It is considered that these are the minimum measures necessary to prevent or reduce the detrimental effect the anti-social behaviours are having on the quality of life of those living or working in or visiting the area.

5.32 If the PSPO is approved, the timeline for implementation is as follows:

October & November – Police training

October – Sign design

November – Sign production

December – Installation of signs

December – PSPO go live-date

6 ALTERNATIVE OPTIONS CONSIDERED

6.1 Not approving the PSPO may have reputational impact for the community safety partners who have requested assistance in tackling the behaviour exhibited. Failure to introduce the new PSPO may continue to inhibit the Council's ability to make use of new powers to tackle anti-social behaviour in the area. The Police team and Council will continue to issue Community Protection Notice Warnings (CPNW) to try and prevent the behaviour from taking place.

7 CONTRIBUTION TO COUNCIL PRIORITIES

7.1 Croydon's Executive Mayor Business Plan sets a new direction, building on the hopes and aspirations of our residents and businesses. The PSPO will contribute directly to outcome four: Croydon is a cleaner, safer and healthier place, a borough we're proud to call home.

8 IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

Revenue and Capital consequences of report recommendation

	Current Year	Medium Term Financial Strategy – 3 year forecast		
	2023/24	2024/25	2025/26	2026/27 (*)
	£'000	£'000 (*)	£'000 (*)	

Revenue Budget Available				
Expenditure Income	6	0	0	0
Effect of decision from report				
Expenditure Income	6	0	0	0
Remaining Budget	0	0	0	0
Capital Budget available				
Expenditure Income	0	0	0	0
Effect of decision from report				
Expenditure Income	0	0	0	0
Remaining Budget	0	0	0	0

- 8.1.1 There are limited capital or revenue implications associated with this report. There are no significant financial impacts from the Policy identified and no additional funding is being requested.
- 8.1.2 The primary cost to proceed with a PSPO would be installing new signage through the proposed PSPO zone and would be met from existing budgetary provision. This will cost approximately £6000.
- 8.1.3 Sustainable Communities, Regeneration & Economic Recovery Department. Comments approved by Darrell Jones Acting Head of Finance on behalf of the Director of Finance 9th August 2023

8.2 LEGAL IMPLICATIONS

- 8.2.1 Section 59 of the Anti-social Behaviour, Crime and Policing Act 2014 provides that a local authority may make a public spaces protection order if satisfied on reasonable grounds that two conditions are met. The first condition is that activities carried on in a public place within the authority's area have had a detrimental effect on the quality of life of those in the locality, or that it is likely that activities will be carried on in such a place and that they will have such an effect. The second condition is that the effect, or likely effect of the activities is, or is likely to be of a persistent or continuing nature, is, or is likely to be such as to make the activities unreasonable, and justifies the restrictions imposed by the notice.
- 8.2.2 In addition, the only prohibitions or requirements that may be imposed are ones that are reasonable to impose to prevent such detrimental effect from continuing, occurring or recurring, or to reduce such detrimental effect or to reduce the risk of its continuance, occurrence or recurrence.
- 8.2.3 Section 72 of the 2014 Act requires a local authority to carry out the "necessary consultation, and the necessary publicity and the necessary notification (if any)" before making a PSPO. The necessary consultation means consulting with the relevant Chief Officer of Police and the local policing body, and whatever community representatives the local authority thinks it's appropriate to consult, and the owner or occupier of land within the restricted area. Details of the consultation which has been carried out, and the outcome of that consultation are set out in this report.
- 8.2.4 The "necessary publicity" means in the case of a proposed order, publishing the text of it. The text of the proposed order will be published in the event of a positive decision by the Executive Mayor in Cabinet. The draft order can be seen in Appendix D.
- 8.2.5 The "necessary notification" means notifying certain authorities of the proposed order.
- 8.2.6 Section 72 of the 2014 Act requires a local authority, in deciding whether to make a PSPO and if so, what it should include, to have particular regard to the rights of freedom of expression and freedom of assembly as set out in articles 10 and 11 of the Convention for the Protection of Human Rights and Fundamental Freedoms. In addition, under Section 6 of the Human Rights Act 1998 it is unlawful for the Council, as a public authority, to act in a way which is incompatible with a Convention right. Given that the proposed PSPO restricts only a limited number of activities within a limited area, and given also the results of the consultation which revealed a high incidence of people witnessing or experiencing anti-social behaviour in the proposed restricted area, it is considered that it is proportionate to make the proposed PSPO as this will fulfil a legitimate aim of curbing anti-social behaviour in public places for the benefit of the law-abiding majority, and that the restrictions which will be placed on the rights and freedoms mentioned above are lawful, necessary and proportionate.
- 8.2.7 It is important to ensure that the scope and the process for making a PSPO is in accordance with the powers and requirements of the 2014 Act. Any challenge to a PSPO would have to be made by an 'interested person' by way of an application in the High Court for permission to seek a Judicial Review. That application must be made within six weeks of the PSPO being made. A person who receives an Fixed Penalty Notice due to a breach of PSPO can also challenge the validity of the order. This means that only those who are directly affected by the restrictions have the power to challenge.

'Interested persons' can challenge the validity of a PSPO on two grounds. They could argue that the council did not have power to make the order, or to include particular prohibitions or requirements. In addition, the interested person could argue that one of the requirements (for instance, consultation) had not been complied with. When the application is made, the High Court can decide to suspend the operation of the PSPO pending the verdict in part or in totality. The High Court can uphold the PSPO, quash it, or vary it.

8.2.8 The arrangements set out in this report and in the report to the Executive Mayor at the May Cabinet seek to evidence support for the various requirements for making a PSPO under the 2014 Act.

8.2.9 The Secretary of State has also issued updated guidance Anti-social Behaviour Powers: Statutory Guidance for frontline professionals on 27 March 2023:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1146322/2023_Update_ASB_Statutory_Guidance_-_FINAL_1_.pdf

under section 73 of the 2014 Act which the Council should have regard to.

Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Legal Services & Monitoring Officer Stephen Lawrence-Orumwense.

8.3 EQUALITIES IMPLICATIONS

8.3.1 The Council has a statutory duty to comply with the provisions set out in the Equality Act 2010. In summary, the Council must in the exercise of all its functions, "have due regard to" the need to comply with the three aims or aims of the general equality duty. These are to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- foster good relations between people who share a protected characteristic and people who do not share it.

8.3.2 Having due regard means to consider the three aims of the Equality Duty as part of the process of decision-making. This means that decision makers must be able to evidence that they have taken into account any impact of the proposals under consideration on people who share the protected characteristics before decisions are taken.

8.3.3 Any proposed PSPO is likely to have a positive impact on certain protected groups such as victims of hate (gender, sex, race, sexuality, religious or disability) related ASB, it will apply to the whole population and its use will be determined by the behaviour occurring rather than the protected group. The exception is young people who cannot be issued with a FPN if they are under 18 years of age.

- 8.3.4 The implementation of any PSPO should not preclude the ongoing of support and outreach services to individuals requiring assistance in the designated area. Support should also be provided to targets of domestic abuse.
- 8.3.5 Following the consultation, if the Council then considers whether to make the proposed PSPO, Section 72 of the Anti-Social Behaviour Crime and Policing Act 2014 will require the Executive Mayor in Cabinet as decision maker for this specific PSPO, to pay particular regard to rights of freedom of expression and freedom of assembly set out in articles 10 (the right to freedom of expression) and 11 (freedom of assembly and association) of the European Convention on Human Rights in considering the making any such order. It would also have to be concluded that the making of the proposed order was proportionate and would fulfil a legitimate aim of curbing anti-social behaviour in public places for the benefit of the law-abiding majority and hence would not infringe article 11 ECHR.

Approved by: Denise McCausland – Equality Programme Manager.

8.4 CRIME AND DISORDER IMPLICATIONS

The proposed PSPO will provide additional powers to Council and Police officers to take action against the prohibitions listed as part of the PSPO within the designated area. This would directly support the Council in discharging its statutory duty under Section 17 of the Crime and Disorder Act 1998 to exercise its various functions with due regard to the likely effect of the exercise of those functions, and the need to do all that it reasonably can to prevent crime and disorder in its area. The proposed PSPO would also support the Council and its partners in delivering the Safer Croydon Strategy, specifically the importance to focus on high priority neighbourhoods.

(Approved by: Director of Culture & Community Safety)

9. APPENDICES

- Appendix A: Report and summary results of the PSPO consultation.
- Appendix B/Bi: Feedback from the Met Police on the PSPO
- Appendix C: Proposed Map of the area.
- Appendix D: Draft PSPO Order
- Appendix E: Feedback from the Parks team
- Appendix F: Further feedback from the Met Police

10. BACKGROUND DOCUMENTS

- Public Space Protection Order Cabinet Report May 2023
- Equality Analysis Form

Public Space Protection Order Consultation

July 2023

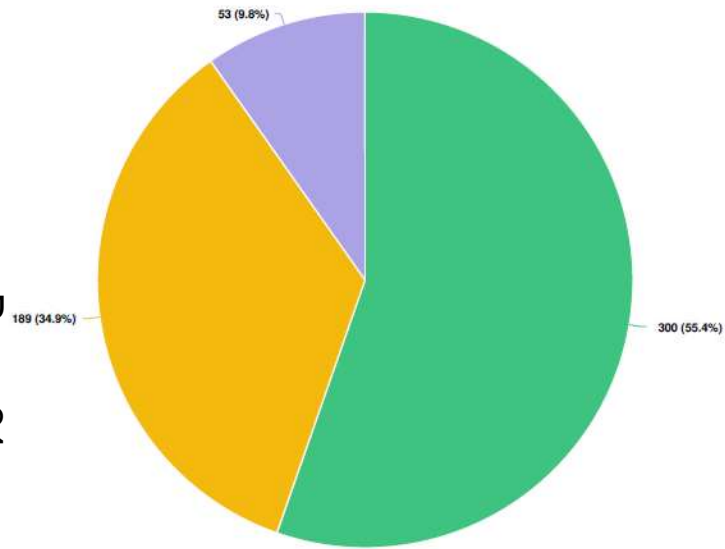
Intelligence & Performance Team – Violence Reduction Network

Main Findings

- There were a total of 551 respondents to the survey.
- 78% strongly agreed with the need for a PSPO in Thornton Heath and its surrounding area. Only 11% strongly disagreed.
- 76% of respondents had experienced people harassing or intimidating residents, businesses or members of the public. 20% had not experienced this.
- 80% of respondents had experienced people using threatening or intimidating behavior including verbal abuse. 17% had not.
- 90% of respondents had experienced people street drinking. Only 10% had not.
- 83% of respondents had experienced people acting in an antisocial manner that causes harassment, alarm or distress. 15% had not.
- 78% of respondents had experienced two or more people acting in a manner likely to cause harassment, alarm or distress. 18% had not.
- 75% of respondents had experienced people urinating in a public place. 24% had not.
- 63% strongly agreed with the proposed area for the PSPO. 14% strongly disagreed.
- In summary, a strong majority of respondents agreed there is an antisocial behavior problem in Thornton Heath and support implementing a PSPO. The most commonly experienced issues were public drinking, verbal abuse/harassment, and urinating in public.

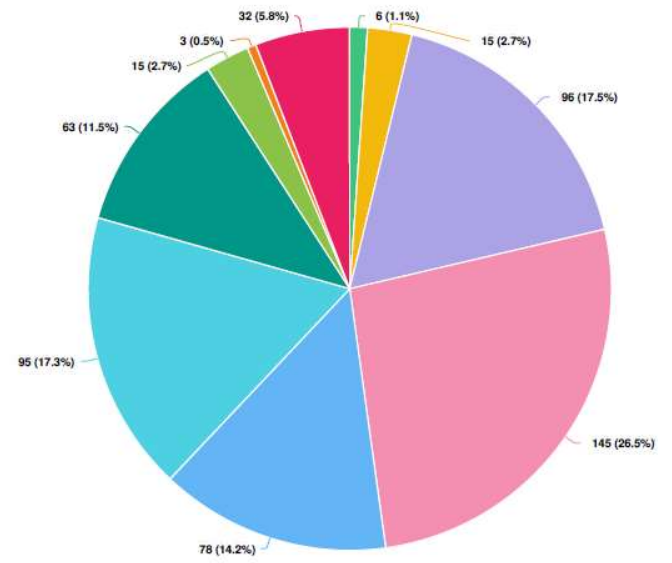
Demographics

Gender identity



Question options
Prefer not to say Male Female

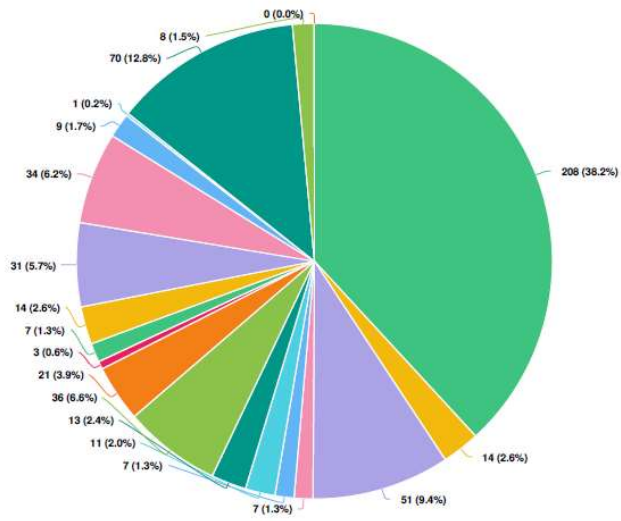
Age group



Question options
Prefer not to say 85+ 75 - 84 65 - 74 55 - 64 45 - 54 35 - 44 25 - 34 20 - 24 16 - 19

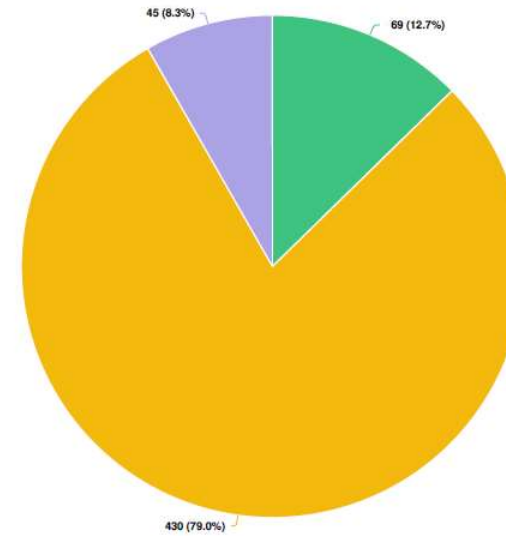
Demographics Cont.

Ethnicity



- Question options**
- White Gypsy or Irish Traveller
 - Other (please specify)
 - Prefer not to say
 - Arab
 - Any other Black background
 - Black Caribbean
 - Black African
 - Any other Asian background
 - Chinese
 - Bangladeshi
 - Pakistani
 - Indian
 - Any other Mixed / multiple ethnic background
 - White and Asian
 - White and Black African
 - White and Black Caribbean
 - Any other White background
 - White Irish
 - White English / Welsh / Scottish / Northern Irish / British

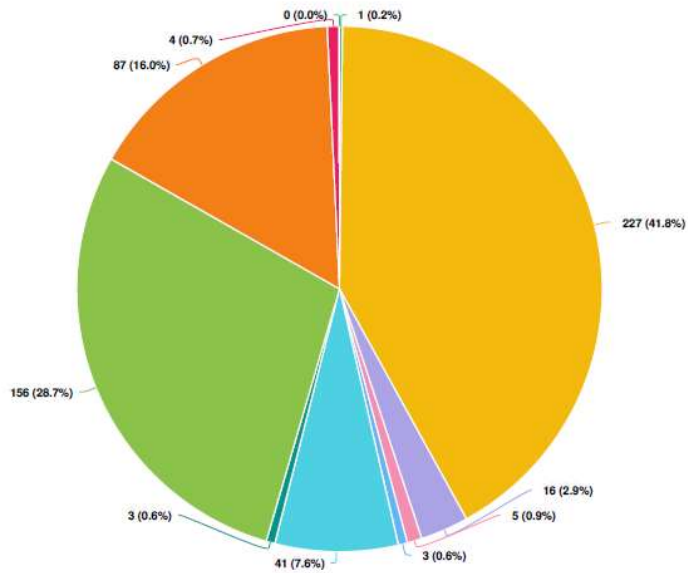
Disability



- Question options**
- Prefer not to say
 - No
 - Yes

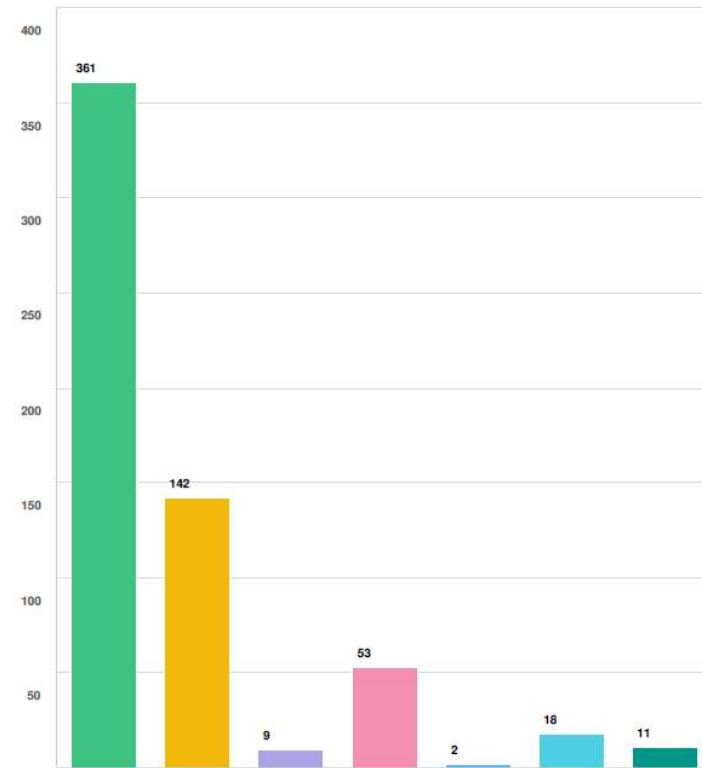
Demographics Cont.

Religion



Question options
 Baha'i Other (please specify) Prefer not to say No religion Sikh Muslim Jewish
 Jain Hindu Christian (including church of England/Catholic/Protestant and all other denominations) Buddhist

Location

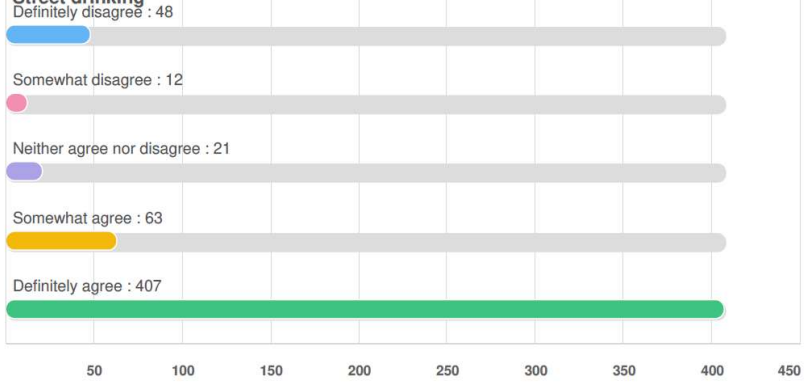


Question options
 Other (please specify) Prefer not to say I study in Croydon I work in Croydon I live outside of Croydon
 I live in Croydon but not the mapped area I live in the mapped area

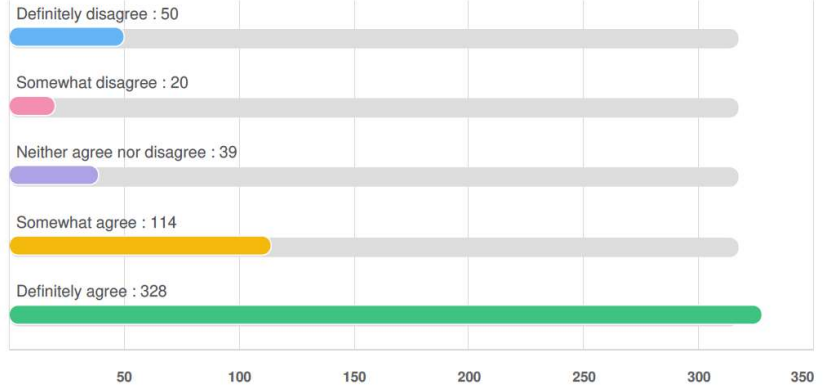
PSPO-specific questions

Q1 How strongly do you agree or disagree that Thornton Heath and its surrounding area (click here to see a map of the proposed...

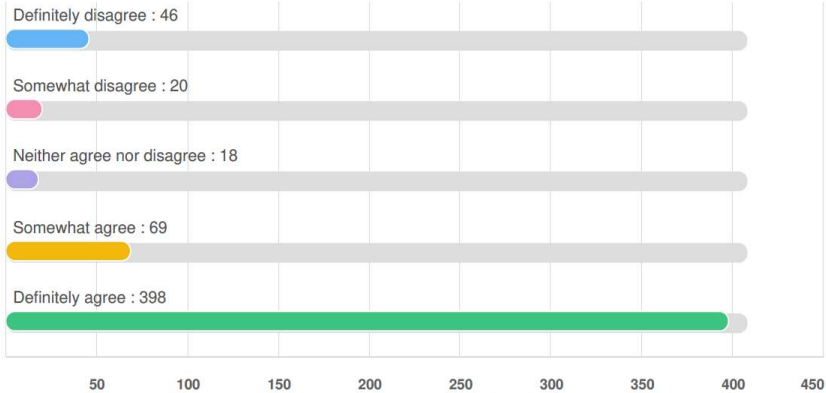
Street drinking



Noise e.g. loud music

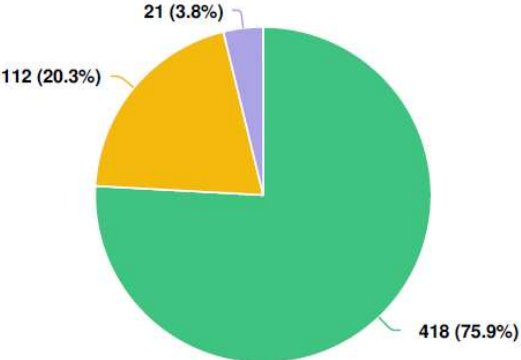


Groups of people causing anti-social behaviour (harassment, alarm or distress to others)



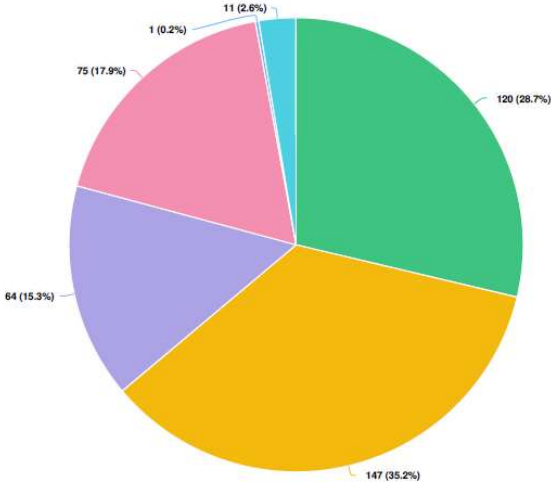
PSPO-specific questions (from left to right)

Q2 Have you experienced or witnessed people harassing or intimidating residents, businesses or members of the public?



Question options
 Prefer not to say No Yes

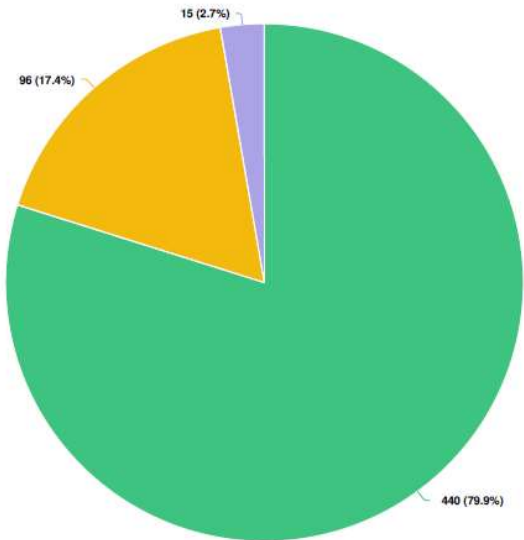
Q3 How often have you experienced this issue?



Question options
 Prefer not to say Never A few times a year Monthly Weekly Daily

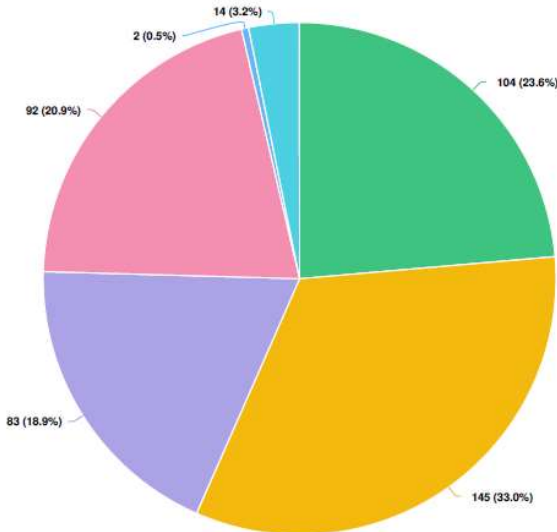
PSPO-specific questions (from left to right)

Q4 Have you experienced or witnessed people using threatening or intimidating behaviour including verbal abuse?



Question options
 Prefer not to say No Yes

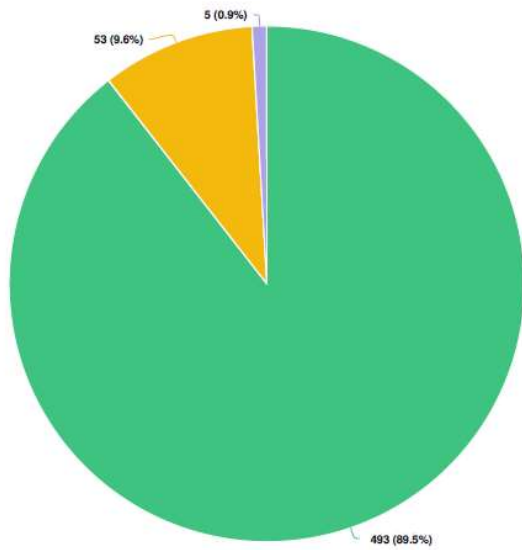
Q5 How often have you experienced this issue?



Question options
 Prefer not to say Never A few times a year Monthly Weekly Daily

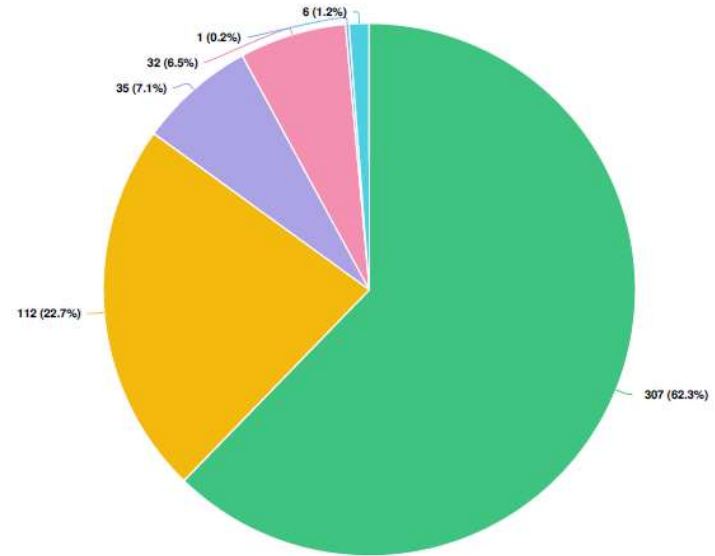
PSPO-specific questions (from left to right)

Q6 Have you experienced or witnessed people street drinking?



Question options
Prefer not to say No Yes

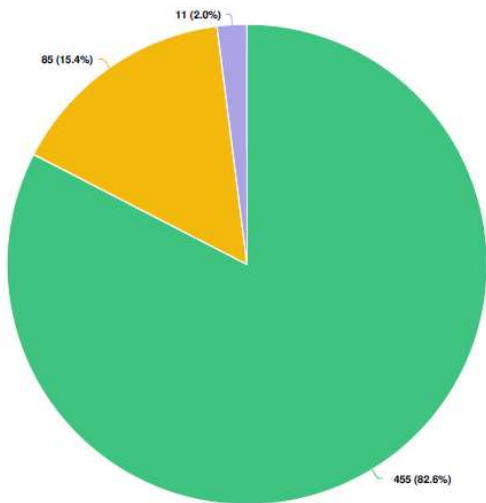
Q7 How often have you experienced this issue?



Question options
Prefer not to say Never A few times a year Monthly Weekly Daily

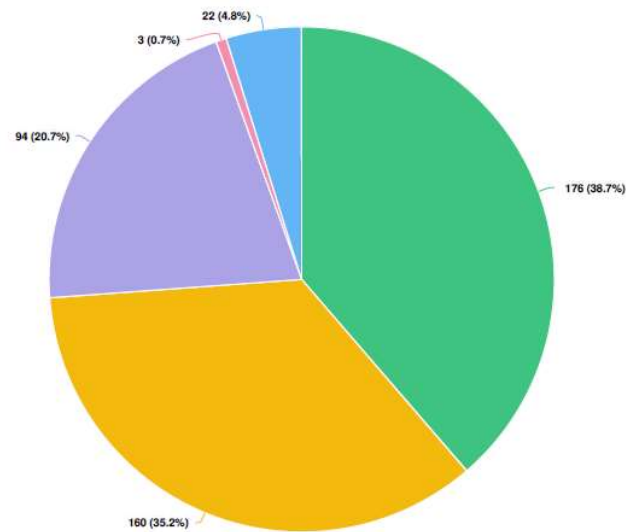
PSPO-specific questions (from left to right)

Q8 Have you experienced or witnessed people acting in an antisocial manner that causes harassment, alarm or distress?



Question options
 Prefer not to say No Yes

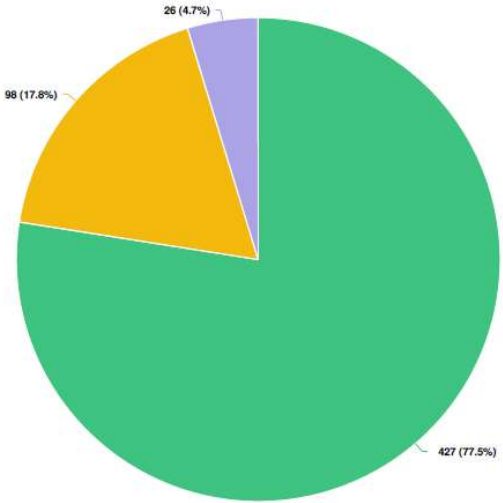
Q9 How often have you experienced this issue?



Question options
 Prefer not to say Never Monthly Weekly Daily

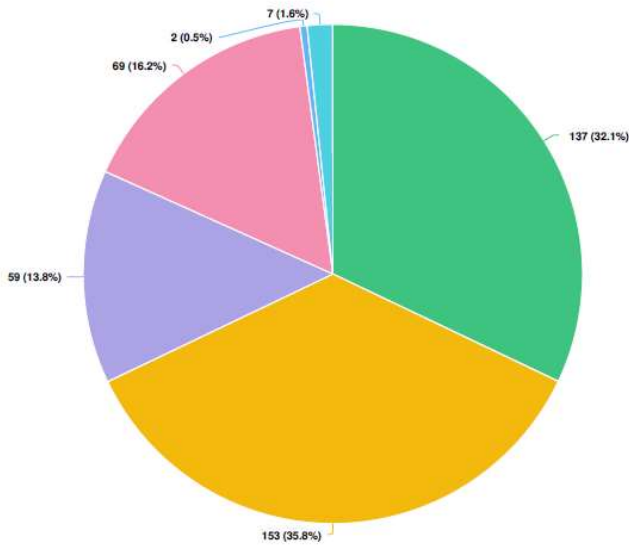
PSPO-specific questions (from left to right)

Q10 Have you experienced or witnessed two or more people acting in a manner you think likely to cause harassment, alarm or distress?



Question options
 Prefer not to say No Yes

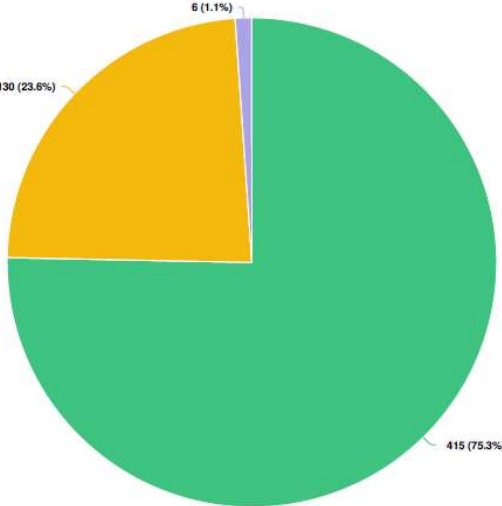
Q11 How often have you experienced this issue?



Question options
 Prefer not to say Never A few times a year Monthly Weekly Daily

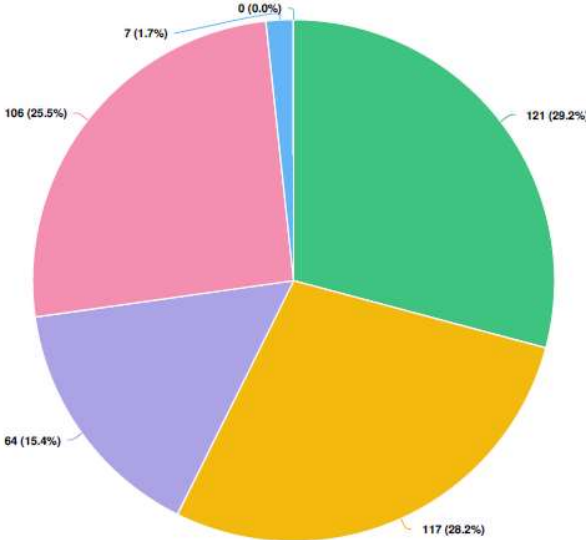
PSPO-specific questions (from left to right)

Q12 Have you experienced or witnessed people urinating in a public place?



Question options
 Prefer not to say No Yes

Q13 How often have you experienced this issue?



Question options
 Never Prefer not to say A few times a year Monthly Weekly Daily

PSPO-specific questions (from left to right)

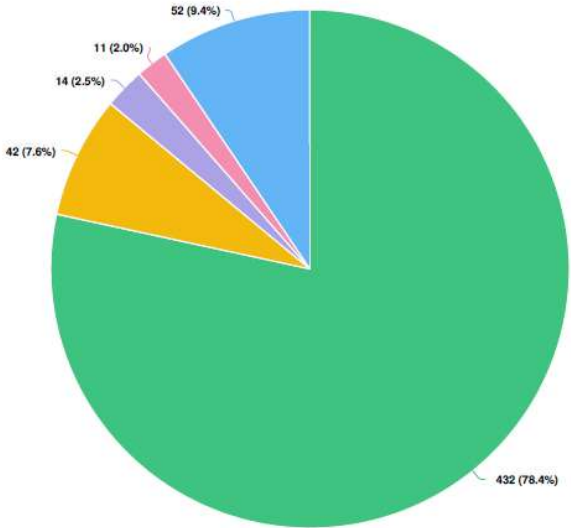
Are there any other issues you have experienced in Thornton Heath that are not listed above?



1. Drugs – mentioned 84 times
2. Drug dealing – mentioned 36 times
3. Drug use – mentioned 48 times
4. Large groups – mentioned 16 times
5. Loud music mentioned 9 times

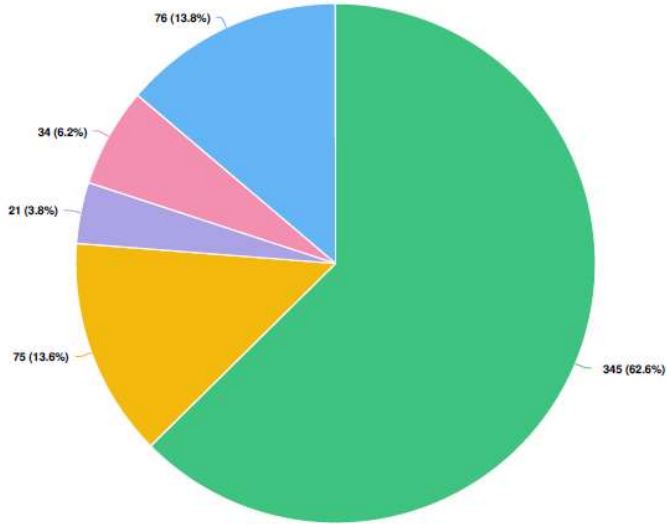
PSPO-specific questions (from left to right)

Q15 How strongly do you agree or disagree with the need for a PSPO in Thornton Heath and its surrounding area? (Click here to see a map of the proposed area.)



Question options
 ● Definitely disagree ● Somewhat disagree ● Neither agree nor disagree ● Somewhat agree ● Definitely agree

Q17 How strongly do you agree or disagree with the proposed area for the PSPO in Thornton Heath and its surrounding area? (Click here to see a map of the proposed area.)



Question options
 ● Definitely disagree ● Somewhat disagree ● Neither agree nor disagree ● Somewhat agree ● Definitely agree

Hello,

I am writing on behalf of West Thornton, Bensham Manor and Thornton Heath Safer Neighbourhood teams. We all work in collaboration and the exclusion of West Thornton Ponds from the wider PSPO will affect all areas.

The extension of the PSPO has the full support from the teams due the fluidity of movement of the individuals who the PSPO is designed to displace from Bensham Manor and Thornton Heath. By excluding The Ponds we will simply be relocating to an area which they already use.

The Ponds frequently has S and I grade calls and is problematic for Response Team and SNT. SNT have worked to issue ASB warnings with the plan to escalate to CPNWs however the issue is that many of the frequenters who are causing more aggravating social issues are moved on from as they are only temporarily housed on one of the many temporary placements on London Road meaning that it can't be escalated from an ASB warning. The individuals who return frequently and drink may not be causing antisocial behaviour when we attend, making it very difficult to issue ASB warnings for just drinking alone. At the moment we have no power to police drinking as antisocial behaviour unless it escalates to drunk and disorderly behaviour. A PSPO will enable officers and ASB council teams to move individuals who are drinking before antisocial behaviour takes place and address the issues that local residents are reporting.

The SNT alone have dealt with a fire, collapsed individuals, rough sleepers, street drinkers fighting amongst themselves, and the Greggs bakery opposite is hit hard for theft which is likely to be attributed to the ASB in the area, in line with the broken windows theory.

Furthermore, with the development of the new flats on the junction of Thornton Road and London Road, this matter is likely to become even more important to more local residents as they move into the building.

Kind regards



Thornton Heath Safer Neighbourhood Team
Metropolitan Police Service

 Address Croydon Custody Police Station, 1st floor | CR0 2XP | South Area



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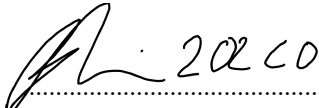
WITNESS STATEMENT

CJ Act 1967, s.9; MC Act 1980, ss.5A(3)(a) and 5B; Criminal Procedure Rules 2005, Rule 27.1

Statement of **PC Robert Glozier 202CO** URN: [] [] [] []

Age if under 18 **Over 18**..... (if over 18 insert 'over 18') Occupation: **Police Officer**.....

This statement (consisting of: pages each signed by me) is true to the best of my knowledge and belief and I make it knowing that, if it is tendered in evidence, I shall be liable to prosecution if I have wilfully stated anything in it which I know to be false, or do not believe to be true.

Signature:  Date: **03/08/2023**.....

Tick if witness evidence is visually recorded (supply witness details on rear)

I am a Police Constable based at the Central Football Unit at Lambeth headquarters. I have been Crystal Palaces Dedicated Football Officer since November 2021.

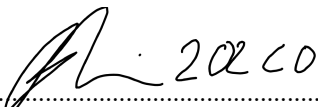
The presence of football related disorderly behaviour and drunken behaviour associated with Violence and Anti-Social Behaviour has long plagued football fixtures. The vast majority of supporters attending football fixtures are law abiding members of the public who should expect to be able to attend without fear of violence or disorder posed by a very small minority. Incidents of football related disorder in the area around the ground and across the country will often take place several hours before and after the scheduled kick off time. The extra abstraction of Police Officers from normal duties also has a knock on effect on policing the local community. One of the problems at Crystal Palace is people walking around drinking. This is purchased from the off-licences around the ground and is uncontrolled with no provisions for urinals and litter both of which impact the local community especially at Park Road.

Where fans gather to drink which leads to larger groups forming and these groups becoming more vociferous, boisterous. These groups present significant challenges to the policing operation at Crystal Palace. The Prince George has long suffered from this poor behaviour being blamed for supporters drinking near the pub outside the confines of their licenced conditions with police powerless to intervene. In Park Road outside the away supporter's turnstiles there is very little room. Here is where supporters gather and wait there is an increase in litter with bottles and cans left strewn over the floor. The front gardens of the house imminently adjacent suffer the worst having cans thrown into the garden and on the floor and supporter urinating on fences and Bins away from the police presence.

At places like Tottenham stadium and more recently Wembley the introduction of the PSPO has seen positive feedback since and very little resistance when alcohol has been seized from supporters and a large reduction in Anti-social behaviour and violence attributed to drinking in the street.


The PSPO could also provide a power to deal with the pyrotechnic problem outside the stadium. The Sporting Events (Control of Alcohol) Act is limited to offences when entering the stadium or within view of the pitch but the PSPO could give additional power to constables in dealing with Pyrotechnics.

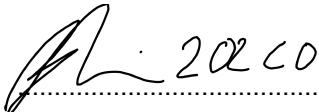
The problem should not be underestimated with the potential injuries sustained as a result of pyrotechnics including: loss of limb or fingers, severe burns due to temperatures up to 2000°C, breathing problems due to smoke inhalation and loss of hearing or sight due to explosive power.

Signature:  Signature witnessed by:

Continuation of Statement of Glozier Robert J - SCO22 - Public Order.....

The council are producing a Map for ease of reference but the areas for the match day operation which sees the vast majority of football fans use is from Norwood Junction towards the Stadium sees the vast majority of fans travel to the ground on a match day. Selhurst Road from East of the Junction with Portlands Road to Dagnall Park. From Thornton Heath Rail station down to the Railway Telegraph. Along the High Street (B266) encompassing the Atlantic Bar and Prince George and then length of Whitehorse lane to South Norwood Hill. This encompasses the walk to the ground and where the coaches park just past the ground and includes Park Road and Holmesdale Road which surround the ground.

 2020

Signature:  Signature witnessed by:

Witness contact details

Home address: C/O Lambeth HQ
..... Postcode:
Home telephone number Work telephone number 07393 761 800
Mobile/pager number Email address:
Preferred means of contact:
Male / Female (delete as applicable) Date and place of birth:
Former name: Ethnicity Code (16+1): Religion/belief:

Dates of witness non-availability

Witness care

- a) Is the witness willing and likely to attend court? Yes / No. If 'No', include reason(s) on **MG6**.
- b) What can be done to ensure attendance?
- c) Does the witness require a Special Measures Assessment as a vulnerable or intimidated witness? Yes / No. If 'Yes' submit **MG2** with file.
- d) Does the witness have any specific care needs? Yes / No. If 'Yes' what are they? (Disability, healthcare, childcare, transport, , language difficulties, visually impaired, restricted mobility or other concerns?)

Witness Consent (for witness completion)

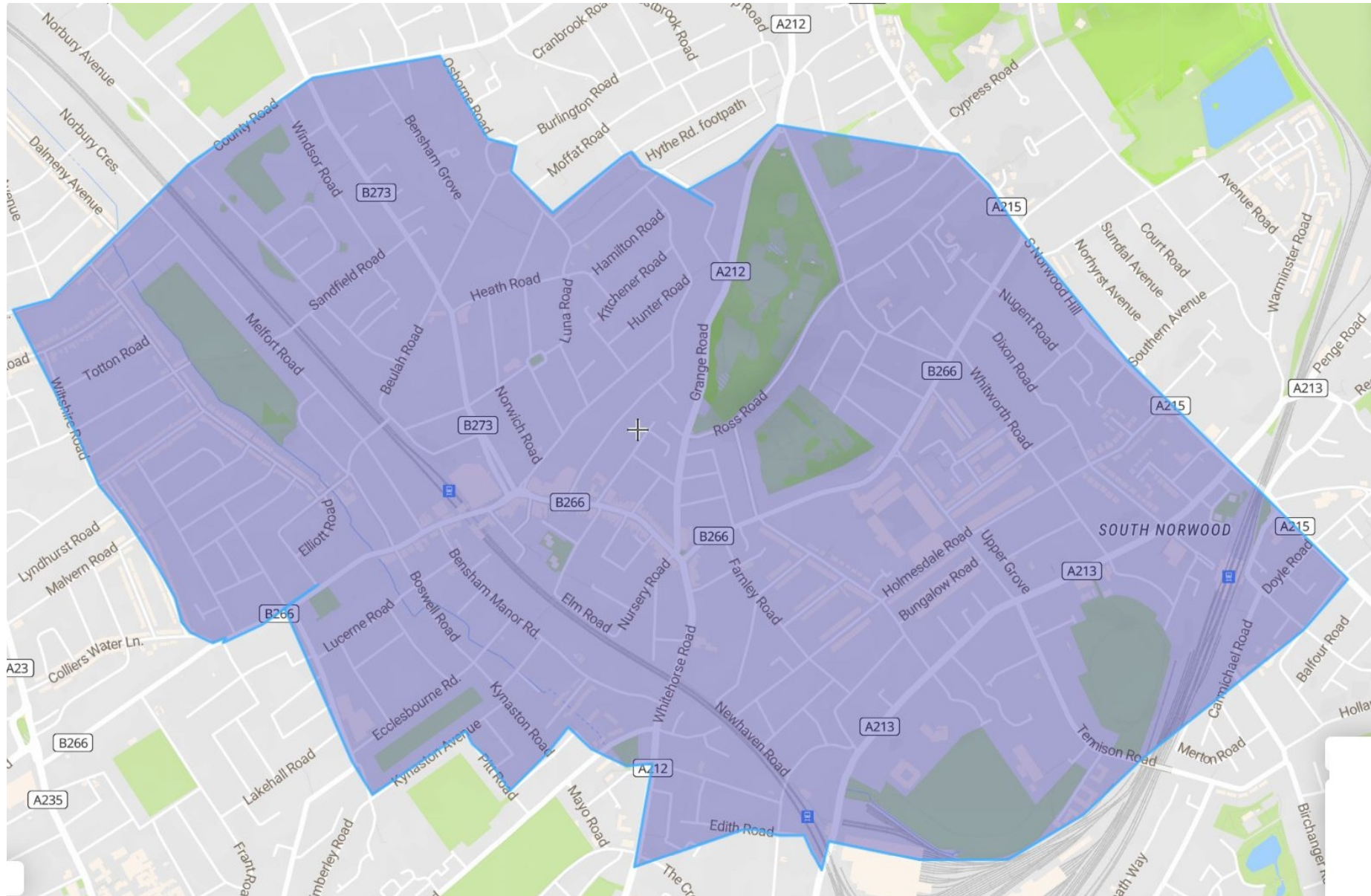
- a) The criminal justice process and Victim Personal Statement scheme (victims only) has been explained to me Yes No
- b) I have been given the Victim Personal Statement leaflet Yes No
- c) I have been given the leaflet 'Giving a witness statement to police — what happens next?' Yes No
- d) I consent to police having access to my medical record(s) in relation to this matter: (obtained in accordance with local practice) Yes No N/A
- e) I consent to my medical record in relation to this matter being disclosed to the defence: Yes No N/A
- f) I consent to the statement being disclosed for the purposes of civil proceedings e.g. child care proceedings, CICA Yes No
- g) The information recorded above will be disclosed to the Witness Service so they can offer help and support, unless you ask them not to. Tick this box to decline their services:

Signature of witness: Print name:
Signature of parent/guardian/appropriate adult: Print name:
Address and telephone number if different from above:

Statement taken by (print name): Station:

Time and place statement taken:

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LONDON BOROUGH OF CROYDON

THORNTON HEATH AND SURROUNDING AREAS IDENTIFIED IN SCHEDULED 1

PUBLIC SPACE PROTECTION ORDER (No.1 2022)

ANTI-SOCIAL BEHAVIOUR, CRIME AND POLICING ACT 2014, AS AMENDED

This Public Space Protection Order (Order) is made under Section 59 of the Anti-Social Behaviour, Crime and Policing Act 2014, as amended (ASBCPA 2014).

1. Croydon Council, in making this Order:-

- a. Is satisfied on reasonable grounds that:-
 - i. The activities itemised in paragraph 2, below have been carried out in a public place within the London Borough of Croydon, namely the area identified below as the Restricted Area, and have had a detrimental effect on the quality of life of those in the locality, and that:-
 - ii. The effect, or likely effect of the activities:-
 - a. Is, or is likely to be, of a persistent or continuing nature;
 - b. Is, or is likely to be, such as to make the activities unreasonable; and,
 - c. Justifies the restrictions imposed by the Order.
- b. Is satisfied that the prohibitions and requirements imposed by this Order are reasonable in order to prevent the detrimental effect referred to in paragraph 1 above from continuing, occurring or recurring, or to reduce that detrimental effect, or to reduce its risk of continuance, occurrence or recurrence.
- c. Has had regard to the rights and freedoms set out in the European Convention on Human Rights as defined in Section 21(1) of the Human Rights Act 1998, and in particular, those rights set out in Article 10 (right of freedom of expression), and Article 11 (right of freedom of assembly and association), and has concluded that the restrictions on such rights and freedoms imposed by this Order are lawful, necessary and proportionate.

THE RESTRICTED AREA

2. This Order applies to the area in the London Borough of Croydon to which the public have or are permitted access, whether with or without payment, as identified in the Schedule attached to this Order and shown in the plan attached to this Order including any street, road, footway, footpath, square, courtyard, grassed area, stairway, walkway, subway, car parks or similar.

THE ACTIVITIES

3. The Activities referred to in paragraph 1 of this Order are:-
 - a. Consuming alcohol in the restricted area other than in premises identified in Section 62 of ASBCPA 2014, as amended;
 - b. Individuals or groups of people behaving in a manner causing or likely to cause harassment, alarm or distress, in the restricted area;
 - c. Urinating in any public place in the restricted area, other than public toilets.

THE PROHIBITIONS

4. By the Order, no person shall at any time in any public place within the restricted area (the boundaries of which are shown on the plan attached to this Order) engage in any of the following prohibited activities as identified in paragraph 4(a)i, 4(a)ii and 4(a)iii of this Order:-
 - a. In the area being Thornton Heath and the surrounding areas as identified in Schedule 1 to the Order and the plan attached to this Order:-
 - i. Consume alcohol, or be in possession of an open container of alcohol, except in premises falling within Section 62 of the ASBCPA 2014;
 - ii. Behave in a manner, either as an individual or within a group of people, which causes, or is likely to cause harassment, alarm or distress;
 - iii. Urinate in a public place, except a public toilet, as defined by paragraph 2 of this Order.

THE REQUIREMENTS

5. Any person directed to leave the restricted area by a Police Officer, Police Community Support Officer or any other officer authorised to make such a direction by Croydon Council, shall do so. Such a direction may be given where the officer is satisfied that the person concerned has breached this Order by engaging in a prohibited activity as identified in paragraph 4 of this Order.

INFORMATION

6. By virtue of Section 63 of the ASBCPA 2014, as amended, where a constable or a person authorised by the Council or under s.69 of the ASBCPA 2014 reasonably believes that a person:

(a) is or has been consuming alcohol in breach of a prohibition in a public spaces protection order, or

(b) intends to consume alcohol in circumstances in which doing so would be a breach of such prohibition, the constable or authorised person may require a person:

(i) not to consume, in breach of the order, alcohol or anything which the constable or authorised person reasonably believes to be alcohol;

(ii) to surrender anything in a person's possession which is, or which the constable or authorised person reasonably believes to be, alcohol or a container for alcohol.

7. A constable or an authorised person who imposes a requirement under Section 63 must tell the person that failing without reasonable excuse to comply with the requirement is an offence. Such a requirement imposed by an authorised person is not valid if the authorised person:

(a) is asked by the person to show evidence of his or her authorisation, and

(b) fails to do so.

8. A constable or an authorised person may dispose of anything surrendered (namely alcohol or anything reasonably believed to be alcohol) in whatever way he or she thinks appropriate.

9. A person who fails without reasonable excuse to comply with a requirement imposed on him or her by a constable or authorised person commits an offence and is liable on summary conviction to a fine not exceeding level 2 on the standard scale (currently £500).

10. By virtue of s.67 of the ASBCPA 2014, it is an offence for a person without reasonable excuse:

(a) to do anything that the person is prohibited from doing by this Order, or

(b) to fail to comply with a requirement to which the person is subject by this Order.

11. A person guilty of an offence under this section is liable on summary conviction to a fine not exceeding level 3 on the standard scale (currently £1000).

12. A person does not commit an offence under this section by failing to comply with a prohibition or requirement that the Council did not have power to include in this Order.

13. By virtue of Section 68 ASBCPA 2014, as amended, a constable or authorised person may issue a fixed penalty notice to anyone he or she has reason to believe has committed an offence under Sections 63 or 67 in relation to a Public Space protection Order. The Fixed penalty notice offers the person to whom it is issued the opportunity of discharging any liability to conviction for the offence by payment within

a specified period to the local authority of a fixed penalty. The fixed penalty may be for no more than £100.00 and may give a lower amount to be paid within a period of not less than 14 days.

13. If an interested person wishes to challenge the validity of this Order he or she may apply to the High Court within six weeks beginning with the date on which this Order is made. The grounds on which a challenge can be made are that the Council did not have the power to make this Order, or that a requirement imposed by Chapter 4 of the ASBCPA 2014, as amended was not complied with, see further section 66 of the ASBCPA 2014, as amended.

COMMENCEMENT, DURATION AND CITATION

12. This Order is made on [**insert date**] and shall come into force on this date. This Order shall remain in force for a period of three years.

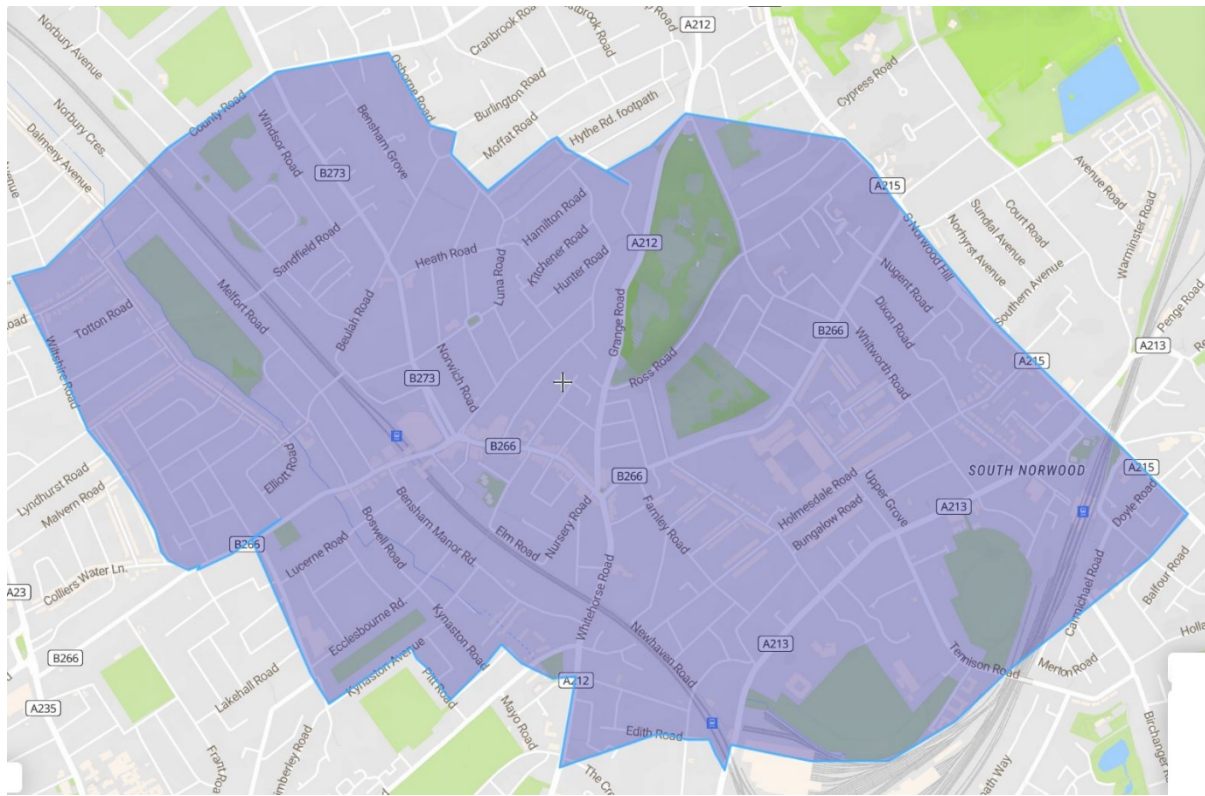
13. This Order may be cited as the Public Spaces Protection Order for the London Borough of Croydon No.2 of 2022.

Dated

.....
Signed:

Director

SCHEDULE 1



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Good afternoon

Thank you for your email and reaching the parks team for comments.

I strongly support the idea of extending the PSPO to cover the entire park.

Over the last couple of months there has been a remarkable increase of antisocial behaviour at Grangewood Park, I received reports of park furniture being damaged (e.g. two benches set alight in the last 2 weeks), park features being vandalised, alcohol related activities taking place in the newly refurbished playground and uncontrolled dogs roaming the park.

Covering half of the park will only create confusion and undermine the intention of the proposed PSPO making it really difficult for the police to assist the council with any problem arising in the future.

Kind Regards,

Parks Team Leader

Sustainable Communities, Regeneration & Economic Recovery Directorate.

Public Realm Offices

Stubbs Mead, Factory Lane.

Croydon CR0 3RL

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Dear safer Croydon,

I am writing on behalf of Bensham Manor, Thornton Heath and West Thornton Safer Neighbourhood teams. We all work in collaboration and the exclusion of half of Grangewood Park from the wider PSPO will affect other areas.

There has been historic reports of ASB in the park, where by park benches have been set alight and general Anti-social behaviour within the park.

From a policing perspective to only cover half of the park in the PSPO would be counter intuitive. The issue being is not knowing where the boundary is in the park, which could displace the problem within the park. This would make it very difficult to enforce the PSPO with in the park.

Kind regards



Thornton Heath Safer Neighbourhood Team
Metropolitan Police Service

 **Address** Croydon Custody Police Station, 1st floor | CR0 2XP | South Area



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LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	27th September 2023	
REPORT TITLE:	Youth Safety Delivery Plan	
CORPORATE DIRECTOR / DIRECTOR:	<p>Nick Hibberd Corporate Director of Sustainable Communities, Regeneration & Economic Recovery</p> <p>Debbie Jones Corporate Director for Children and Young People</p> <p>Kristian Aspinnall Director of Culture & Community Safety</p>	
LEAD OFFICER:	<p>Kristian Aspinnall <u>Kristian.aspinnall@croydon.gov.uk</u></p>	
LEAD MEMBER:	<p>Councillor Ola Kolade Cabinet Member for Community Safety</p> <p>Councillor Maria Gatland Cabinet Member for Children and Young People</p>	
KEY DECISION?	No	N/A
CONTAINS EXEMPT INFORMATION?	No	Public
WARDS AFFECTED:	<i>All</i>	

1 SUMMARY OF REPORT

- 1.1** This report outlines the work done in the last 12 months to deliver on the Executive Mayor’s commitment to making Croydon’s streets safer for young people, the plan for the next three years of action, and the commitments to partnership working with the voluntary sector and community to tackle violence.
- 1.2** The plan is attached as Appendix 1. For the context of this work, younger people include people aged 11 to 25.

2 RECOMMENDATIONS

For the reasons set out in the report and its appendices, the Executive Mayor in Cabinet, is recommended:

- 2.1 To endorse the work delivered to improve youth safety in the last year.
- 2.2 To agree the plan contained in appendix 1 as the three-year delivery plan.
- 2.3 To support the development of public health funded initiatives to improve youth safety.
- 2.4 To agree the commitments to working with the voluntary sector and communities as outlined in the plan and section 6.

3 REASONS FOR RECOMMENDATIONS

- 3.1 The Executive Mayor's Business Plan outlines his commitment to "make Croydon safer for young people", in addition to tackling knife crime and ensuring children and young people in Croydon have the chance to thrive, learn and fulfil their potential.
- 3.2 Over the last twelve months, a significant amount of work has been delivered to make Croydon safer for young people. This follows the tragic murders of five teenagers in 2021 and the continued high levels of violence amongst young people in the borough. The work was delivered in partnership with and by the Council, Police, and voluntary sector. The work includes:
 - Additional investment in key areas such as Croydon Town Centre, Thornton Heath, New Addington and Shrublands, with 6 months of youth outreach work delivered by trusted local partners.
 - Rapid response to critical incidents in the borough, with local charities funded to deliver on-street youth work within 48 hours of an incident to help ease community tensions, support young people who may be affected, and prevent reprisals.
 - Multiple intervention programmes aimed at helping young people leave crime and not reoffend.
 - Dedicated Police robbery patrols to deter young people from being robbed.
 - Extra grants for summer holiday and back-to-school activity in key areas to provide more diversionary activity.
 - A new Substance Misuse Board to work across Health, Police, and Council to tackle the supply and demand of drugs in the borough which drives violence.
 - Smart watermarking for young people in schools to help deter robbery.
 - Closer working with British Transport Police on transport hub safety for young people.
 - A new Community Safety Engagement Board to allow all community groups, voluntary sector organisations, and businesses to help work with the partnership on making Croydon safer.

- Investment in our sports pitches across Croydon to provide more diversionary activity for young people.
- 3.3** A key example of the improvement of response was the multi-agency approach to issues on Church Street in Croydon Town centre. There were significant concerns around large groups of young people, knives, anti-social behaviour, and low-level crime aimed at local businesses. The Council, Police, and key community groups rapidly developed an intelligence profile drawing on statutory information and local qualitative information from the community. We then worked rapidly in partnership with local groups to put additional youth workers and outreach workers (from youth groups already active and with trusted relationships into the area), to help support young people and get them off the streets. This had an immediate noticeable effect, significantly reducing the number of young people at risk and preventing further violence and crime.
- 3.4** Comments and feedback from key partners and community groups at the MyEnds forum and the Community Safety Engagement Board reflect the improvement over the last year. Although there is an acknowledgement that there remains more to do, the speed of the Council's response and the willingness to work in new, innovative ways with community groups and partners has been recognised and praised as a step-change in how the borough tackles violence against young people.
- 3.5** The attached plan draws that work into a framework for delivery over the next three years, based on the key themes of:
- Prevention – stopping young people becoming at risk.
 - Intervention – supporting those young people at risk.
 - Disruption – tackling the gangs exploiting our young people.
 - Diversion – providing positive alternatives for young people.
- 3.6** It has been developed in consultation with key partners and will continue to be developed with the voluntary sector, communities, and young people over the lifespan of the plan.
- 3.7** This plan directly links to, and was developed alongside, the Youth Justice Plan, together. Both complement each other and work towards the same outcome – making Croydon safer for young people. This plan directly contributes towards the key performance indicators of the Youth Justice Plan in reducing the number of young people entering the criminal justice system.
- 3.8** The plan outlines an achievable series of actions that will lead to measurable improvements in safety for young people and is recommended for approval.

4 BACKGROUND AND DETAILS

- 4.1** Violence against young people has been unacceptably high in Croydon for many years. As section 3 of the plan outlines, Croydon has had some of the highest levels of violence involving young people in London, across various violent crime types.
- 4.2** We recognise that this violence is disproportionate. It affects young Black boys from the African and Afro-Caribbean community more than others, and as a result impacts

the Black community more than others. Tackling this inequality has been core to all the work delivered since and embedded within this new plan.

- 4.3** In recognition of this, the Council, statutory partners, and the voluntary sector have developed and delivered many significant pieces of work over the years to make Croydon Safer. Key to this was the Vulnerable Adolescent's Review in 2019, which looked at the multi-agency response to youth violence. This was developed into an action plan and delivered from 2019 to 2021 through the Croydon Safeguarding Children Partnership.
- 4.4** Prior to developing the plan, the partnership explored other approaches across the country to better understand best practices. The research aimed to understand how plans were established, implemented and developed in partnership. Boroughs that face similar challenges and have similar demographics were included in the review. As a result, Croydon has incorporated ideas from other plans that can benefit the local area.
- 4.5** The plan takes into account key findings from recent high-profile case reviews which puts greater emphasis on preventive work. The findings will continue to feed into the ongoing delivery plan.
- 4.6** This new plan was developed in response to the Executive Mayor's commitment to making Croydon safer for young people and to tackle knife crime in Croydon. It builds on all the work delivered in recent years by the Council, the Police, and the Voluntary Sector. It is evidence-based and draws upon the annual Crime and Disorder Strategic Assessment, the Vulnerable Adolescent's Review, and all the work and contributions of Croydon's voluntary sector and communities.
- 4.7** The plan will be delivered through a new "Youth Safety Delivery Board" that will be led by Community Safety and Children's Services with key partners from across the partnership. Each theme will have a key lead agency and will include and involve voluntary sector representatives, community members and young people in the design, development, and delivery of further actions. The board will report into the Community Safety Engagement Board, the new forum established in spring 2023 to empower and work with a wide range of Croydon's voluntary sector to make Croydon safer. Ultimately it will report into the statutory Community Safety Partnership and the Croydon Safeguarding Children's Partnership.
- 4.8** This plan is a living document that will continue to be developed over its three-year lifespan. As outlined in the commitments to co-production and in recommendation 2.4, the next steps will be to work with communities to further develop each of the four theme, and to develop, with public health, funded interventions for the lifespan of the delivery plan.
- 4.9** Key areas for development when funding is identified (through Public Health or external funders) include:
- Young people not in Education, Employment, or training (NEETs).
 - Transitions (primary to secondary and 18+).

- What preventative and interventions look like for 18- to 25-year-olds.
- A more direct and resourced approach to embedding anti-racism in our practice.
- Trauma-informed practice in the voluntary sector.
- Work with the PRUs to reduce pupils in the PRUs and better protecting them.
- Better health integration and offer.

4.8 All of these areas are in the current plan, but additional funding / resources will allow us to further develop and grow them.

5 ALTERNATIVE OPTIONS CONSIDERED

5.1 One option was not to develop a delivery plan, and to continue the reactive responses to violence that the partnership has developed and delivered over the last year. However, doing so would inhibit a pro-active approach and long-term planning. It also would have prevented any development of long-term funding options and the ability to attract additional resources from outside Croydon.

5.2 Another option was the development of a 10-year public health strategy. This option was not taken forward as it was felt that:

- Significant work on the long-term causes had already been delivered through the Vulnerable Adolescent's Review.
- Longer-term child exploitation and child protection strategies are being developed through Children's Services and the Children's Safeguarding work.
- There was a need to deliver on the Mayor's commitments and take action rapidly given the challenges facing Croydon.

6 CONSULTATION

6.1 *As outlined in section 5 of the plan, numerous organisations have fed into the work that forms the basis of this plan, both over the last six months and during the preceding years through the Vulnerable Adolescent Needs Assessment and other pieces.*

6.2 *It is key to this plan's continued development and delivery to work in true partnership with residents, voluntary sector organisations, and especially young people through relevant engagement opportunities such as those provided by the Croydon Youth Forum. As such we are making several key consultation commitments for this work:*

- We will develop sub-groups from the Community Safety Engagement Board to ensure each of the four themes has specific plans and projects from the voluntary sector and communities.
- We will ensure this plan is presented at multiple community engagement events throughout its lifespan and seek feedback.
- We will be honest and about its successes and failures, focusing on learning from projects that did not achieve their goals and ensuring that young people

and young adults involved in projects are part of the evaluation.

- We will treat the voices of voluntary sector groups as equals in every sense, recognising their expertise, knowledge, and trusted relationships.
- We will never stop looking for better ways to include young people, their families, and their communities in projects and the overall delivery plan.

7. CONTRIBUTION TO COUNCIL PRIORITIES

7.1 This plan directly contributes towards two key objectives in the Executive Mayor’s Business Plan:

“Make Croydon safer for young people”

“Tackle anti-social behaviour, knife crime, and violence against women and girls so that Croydon feels safer”

It will also contribute to the headline objective that “Children and young people in Croydon have the chance to thrive, learn and fulfil their potential” for the work delivered to under 18s.

7.2 This plan also delivers on one of the three objectives of the Croydon Safer Partnership: tackling violence against young people.

8. IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

8.1.1. There are no direct financial implications arising from the approval of this report and its recommendations. Approval of the recommendations may assist with the development of long-term funding options and the ability to attract additional resources from outside Croydon.

8.1.2 Comments approved by Darrell Jones Acting Head of Finance, for Sustainable Communities, Regeneration & Economic Recovery Department on behalf of the Director of Finance. 9th August 2023

8.2 LEGAL IMPLICATIONS

8.2.1 Although there are no direct legal implications arising from this report, the Council has several statutory duties to children and young people who are the intended recipients of the targeted intervention and support described in this Report. These include:

8.2.2 Section 17 Children Act 1989 to safeguard and promote the welfare of children in their area who are in need.

- 8.2.3 Sections 10-11 Children Act 2004 to ensure that its functions are discharged having regard to the need to safeguard and promote the welfare of children and to promote cooperation between the Council and its relevant partners to ensure that children's wellbeing is improved.
- 8.2.4 Section 17 Crime and Disorder Act 1989 to exercise its functions with due regard to the need to do all that it reasonably can to prevent crime and disorder, the misuse of drugs, alcohol and other substances and re-offending.

Comments approved by the Head of Social Care & Education Law on behalf of the Director of Legal Services and Monitoring Officer. (Date 16/08/2023)

8.3 EQUALITIES IMPLICATIONS

- 8.3.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Sec 149 Equality Act 2010. The Council must, in the performance of its functions, therefore, have due regard to:
- eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
 - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
 - foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 8.3.2** Violence involving young people is a significantly disproportional crime, where the victims are far more likely to be young Black boys than any other demographic and out of line with the local population.
- 8.3.3 This plan acknowledges and recognises the equalities issues, and in the work delivered to date the Black community has been specifically consulted and involved in provision and interventions.
- 8.3.4 The plan will address this disproportionality and ensure that we take a culturally competent approach to all our commissioned services and projects. This will include ensuring that young people and the Black community are involved, and their voices heard in all stages of the plan.
- 8.3.5 An EQIA has been carried out and shows largely no adverse impact on any protected groups. However, as no data is provided because third parties mainly hold it, it is difficult to evidence that conclusion.
- 8.3.6 Comments approved by Naseer Ahmad of the Equalities Programme Manager. (Date 17/08/2023)

9 APPENDICES

9.1 A Youth Safety Delivery Plan

9.2 B Equality Analysis Form

10 BACKGROUND DOCUMENTS

N/A

Croydon Youth Safety Plan
2023 – 2026

September 2023

CONTENTS

1. Introduction
2. What we want to achieve with this plan
3. What we know about Youth Safety in Croydon
4. What is our approach to improving Youth Safety?
5. How we will engage the community
6. Measuring Impact
7. Action Plan

Intro from Croydon's Elected Mayor

Intro from Croydon's Borough Commander

1. Introduction

The Mayor's Business Plan 2022 – 2026, Outcome 4 centres on “**Croydon being a cleaner, safer, and healthier place, a borough we're proud to call home**”. A key priority is to tackle anti-social behaviour, knife crime and violence against women and girls so that Croydon feels safer.

As part of this, the mayor has committed to delivering a **Youth Safety Delivery Plan** that focuses on keeping children and young people safe on the streets of Croydon. The plan will crucially be delivered by working in partnership with children, young people, and young adults, communities and families, and the voluntary sector.

Context

- It is important to recognize this is not a new issue in Croydon, and that a significant amount of work has already taken place by the Council, the statutory partnership, the wider voluntary sector and residents and communities themselves.
- This plan looks to build on that work, learning from the successes and challenges.
- It is part of our wider Community Safety strategy to make Croydon safer for young people. Working in partnership with Children's Services, Police, Community groups and other partners we aim to reduce violence and the fear of violence for young people.
- Over the last year we have already changed how we try to protect young people, through targeted interventions, working closely with trusted voluntary sector partners in high-risk areas, and better identifying young people at risk. This plan will take those changes faster and further.
- We need to consider areas where racial discrimination (in education, the criminal justice system, policing or wider society) might lead to young people of African and African-Caribbean heritage being more susceptible to becoming victims or perpetrators of violence.
- It is important to recognize that the lines between offender and victim are blurred in this space, and young people can be both.
- Involving young people and communities in the design and development of this plan is essential, and this document is only the first stage of that process.
- The plan will continue to change and develop over the course of the next three years.
- Ultimately, fear of violence and crime is the top concern of Croydon's young people, and our main measure of success will be our young people feeling safer on our streets.

2. What we want to achieve with this plan – our headline measures

Our vision

“Children, young people and young adults have the chance to thrive, learn and fulfil their potential”

What we will achieve with this plan

- 1) Fewer young people will be injured on our streets year on year
- 2) Fewer young people will enter the criminal justice system
- 3) Young people will feel safer in Croydon year on year

These are our three top line measures that will determine overall success. All of our activity should contribute in some way to these three over-arching goals.

Note that the Youth Justice Plan, led by the Youth Justice Service, has the statutory responsibility to reduce the number of young people entering the criminal justice system and as such has a significant overlap with this goal. Both plans complement each other and work towards the same aim of making Croydon safer for young people.

How we will do this

- 1) We will get better at identifying young people at risk earlier and faster.
- 2) We will improve how we protect and support those young people.
- 3) We will target and disrupt the gangs that exploit our young people.
- 4) We will remove weapons off the streets.
- 5) We will rebuild trust and confidence in the Police.
- 6) And everything we do will be working in partnership with the community, families, and young people.

3. What do we know about Youth Safety in Croydon

In 2021, London reported the worst year on record for children and young people dying because of serious violence. Tragically, of the 30 teenagers that lost their lives in the Capital, five of these were in Croydon.

Key Stats

- Croydon is a London borough located in South London with a population of 386,710 people, the largest population of any London Authority.
- It is estimated that 93,000 under 18-year-olds live in the borough subsequently giving the borough the largest youth population in London.
- Nearly a quarter of Croydon's population (23.1%) are aged 17 years and under compared to the average for London of 21.6%.
- There are 99 primary schools & 34 secondary schools.
- The number of looked after children in Croydon remains the highest in London.
- Like other London boroughs, Croydon has a higher proportion of residents from the Non-White communities compared to the national average. The Census 2021 data shows that there was more diversity in the younger age group population in Croydon.
- There is a higher proportion of males compared to females in the 0-17 years age band in Croydon. There is a higher proportion of females to males in the 18-64 years age band. The 65 years plus age group makes up 13.6% of the total population in Croydon compared to the average for London of 11.9%.

Serious Youth Violence

- Between April 2018-19 and April 2019-20, there was a 19% decrease in knife crime with injury among young people under 25-year-olds in Croydon. This indicates a downward pre-pandemic trend in Serious Youth Violence.
- However, total knife crime rates increased by 2% in Croydon in that period. Non-domestic knife offenses rose 15% from March 2019 to March 2020, just before the pandemic hit.
- In the year ending March 2023, Croydon saw a 12% increase in knife crime offenses from the previous two years, indicating an upward trend in the post-pandemic period.
- Between July 2019 and July 2023, Croydon is ranked 2nd in SYV crime count among the other London Boroughs and 15th in rate per 1,000 people.

Victims of violence over the course of 3 years

- 80% of the victims are male, with an increasing trend for female victims, approximately 2% annually during the last 3 years.
- White Europeans accounted for the highest total percentage of victims (45.70%), followed by Afro-Caribbeans (37.58%).
- Afro-Caribbeans accounted for the highest percentage of victims within their ethnicity (49.65%), followed by White Europeans (56.41%).

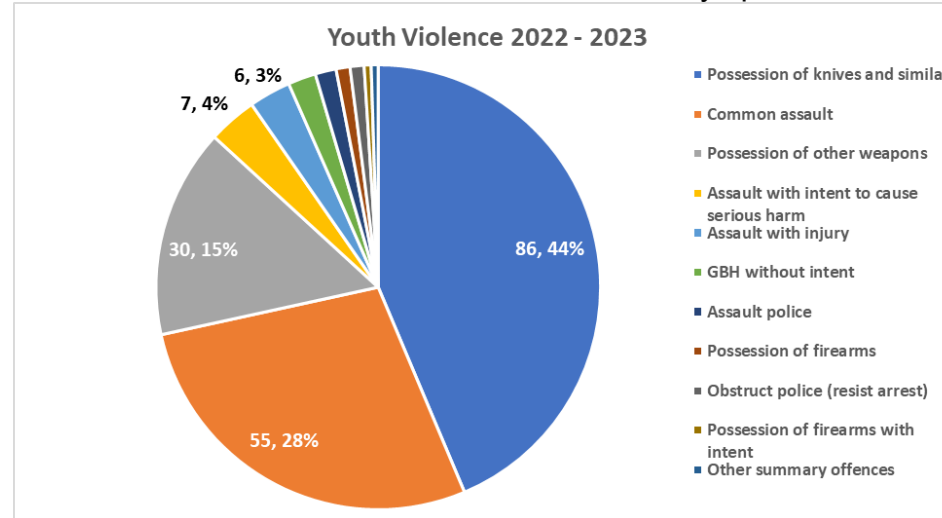
Comparison to Borough of Croydon demographics

- Gender: The victim data skews heavily male, with 65% male victims compared to 48% of Croydon's population being male. This suggests young men are disproportionately affected by serious youth violence relative to their share of the population.
- Age: 27% of victimization occurred among 18-24 year olds, while this age group accounts for only 5.5% of Croydon's population. This indicates serious youth violence disproportionately impacts 18-24 year olds.
- Ethnicity: The victim data shows high representations of Afro-Caribbeans (37.6% of victims ages 1-17) and White Europeans (43.7% of victims ages 1-17). In Croydon, 22.6% are Black African/Caribbean and 48.4% are White. This suggests young Black/African/Caribbeans may be over-represented as victims relative to their share of Croydon's population.
- In summary, the data indicates serious youth violence inordinately impacts young men, those aged 18-24, and potentially Black/African/Caribbean groups compared to their demographic profiles in Croydon.

Youth Justice Service

- Croydon YJS has a high throughput of under 18s making it one of the busiest in London.
- The Youth Justice Service works with young people
- In 2022/23 Croydon Youth Justice Service worked with 281 children on various disposals including: Out of court triages and cautions in addition to post court statutory sentences.
- 63 children of the 281 were placed in borough by other Local Authorities for the YJS to manage on their behalf (22.4%).
- Disposals and Orders can last for a minimum of 3 months up to 18 months and on average there are 120+ children open to YJS at any given time.
- In 2022/23 158 of the 281 were deemed First Time Entrants (entering the system for the first time).
- The YJS continues to see an overrepresentation of ethnically diverse (black or black British) males, albeit there was a reduction during this period.

- Girls remain to be less representative within the cohort but are often younger in age (13-14 whereby the average age for males 15-17). Whilst the female cohort is low, the number is significant with females presenting with their own unique vulnerabilities and risks.
- We know that a number of offences take place amongst individuals who are over the age of 18 years old who would not be engaging with the YJS.
- The table below shows youth violence offences which has been broken down by specific offences.



The role of drug markets and drug supply

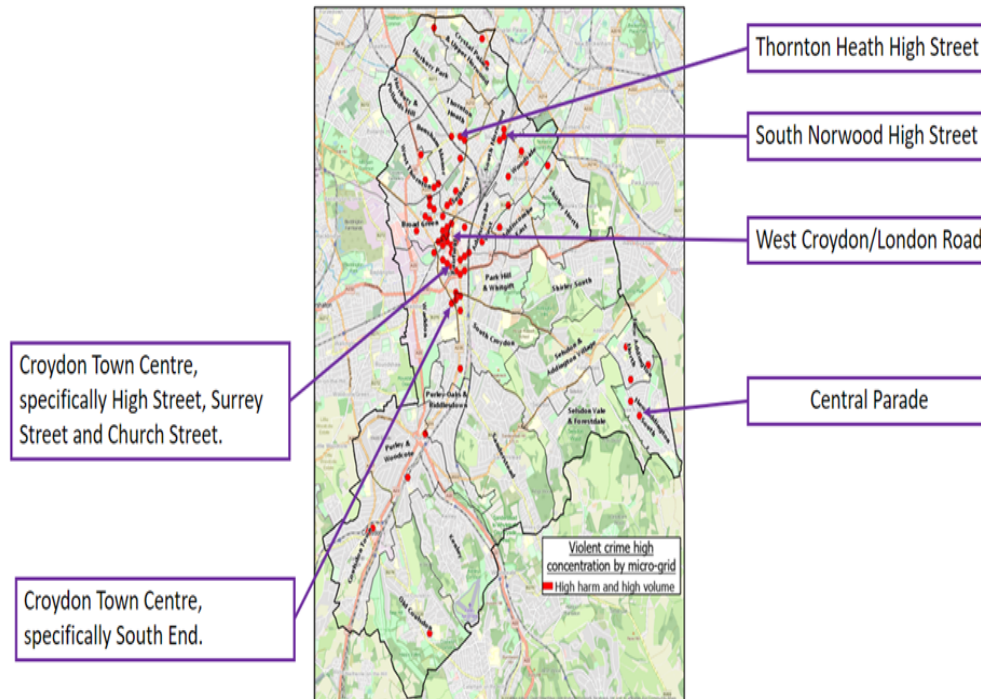
- The circumstances involving the drug market is complex and the supply of drugs in Croydon contributes to the violence taking place in the borough. Criminal organisations and adults who are involved in the supply of drugs target vulnerable young people and exploit them in order to distribute drugs for their own personal gain. As a result of the competitive nature of the drugs market, this has led to violent acts unfold in public spaces as well as behind closed doors. Breaking the supply of illicit drugs will contribute to the reduction of violence and safeguard vulnerable young people. The open air drugs market is considered within the hotspot locations.
- Furthermore, the borough reports high levels of involvement with county-lines and is deemed to have the highest numbers in London (Rescue and Response, 2023).

The role of gangs

- The partnership have identified a number of gangs who are operating in the borough as well as work with other Local Authorities who may directly impact the behaviour taking place in the borough. Due to the criminal nature of the gangs such as drug dealing, knife point robberies and violence, there is often a conflict or tension between the gangs and their members, this can lead to violent acts in public spaces as well as behind closed doors. Young people are being exploited by gang members into conducting violent acts in the name of the gang, this can lead to retaliation which continues the cycle of violence.

Hotspot Locations

- As part of the Strategic Assessment 2022, the Partnership identified micro-grids of high volume and high harm violent crime locations which we should focus on. This is due to relatively disproportionate levels of violence and other crimes of concern that are contained within these locations.



Delivering on prior and current learning

This Youth Safety plan draws on Learning Reviews undertaken in Croydon about Croydon, and also draws from both national and regional learning. The 2019 I Vulnerable Adolescents Thematic Review was commissioned by Croydon's strategic partners through the Croydon Safeguarding Children's Board to support the improvement and effectiveness of the multi-agency response to children and families in Croydon.

The review considered sixty vulnerable adolescents in total and made five key findings with fifteen recommendations for consideration, which were far reaching and included **early help and prevention is critical** (finding 1), **greater recognition of, and response to children's emotional health and wellbeing is needed** (finding 2), **an integrated, whole systems approach is needed across agencies communities and families** (finding 3), **schools should be at the heart of multi-agency intervention** (finding 4) and **disproportionality, linked to ethnicity, gender and deprivation requires attention and action** (finding 5).

These recommendations have been acted upon through the Vulnerable Adolescents Priority Group of the CSCP and the partnership continues to incorporate the learning into practice.

Following the deaths of five children and young people in 2021 as a result of knife crime the CSCP commissioned a Serious Practice Review focused on Extra-Familial Harm. This review is reaching it's conclusion and will be published in due course.

A specific partnership strategy to tackle exploitation of 11 – 25 year olds is in development.

4. What is our approach?

The **Youth Safety Delivery Plan** focuses on four key themes:

- **Prevention** - how do we stop children and young people being made vulnerable.
- **Intervention** - what we do to help vulnerable children and young people.
- **Disruption** - how we tackle gangs and criminal exploitation of children and young people.
- **Diversions** - our positive offer for children and young people in borough.

These themes are how we organize and think about our work. Throughout our work, we need to ensure we focus on the key questions of:

- 1) How do we identify who this work is for and targeting?
- 2) How do we support those at risk?
- 3) How do we protect those at risk?
- 4) How do we make sure those people are engaged and part of the process?
- 5) How do we know our work is achieving the results we want?

Each area should answer those key questions in its work and projects.

How will we deliver this?

- We will create a new dedicated Youth Safety Plan Delivery board, led by Community Safety and Children's services, that draws in our statutory partners to implement and oversee the delivery of this plan.
- It will report into the **Community Safety Engagement Board**, the public and partner forum open to all residents and voluntary sector groups to work with the statutory partnership on making Croydon safer. This will ultimately report to the Safer Croydon Partnership Executive as the lead partnership board, and also the Children's Safeguarding Partnership Board.
- Each of the four themes will be developed further with members of the statutory partnership, the voluntary sector, and young people working in equal partnership. This is outlined in the "What we will do" section of each template.
- We will work with Public Health to identify further interventions and projects that can be delivered in Croydon over the next three years.
- Wherever possible, we will draw in additional funding from the Mayor's Office for Policing and Crime and the Home Office to supplement and build on this plan.

5. Community & Young People Involvement

Any successful community safety plan puts the voice of young people and their families at the heart of the work. Equally, we know our voluntary sector partners have vital expertise and relationships that are essential for making any change in Croydon. At every stage of our work, young people and communities must be involved in the design, development, delivery and evaluation of what we do, going beyond consultation and into real co-production.

Community Safety Engagement Board

The new Community Safety Engagement Board is a vital part of how we develop and deliver this plan. This Board is open to all organisations and concerned residents in the borough and provides oversight of all our crime reduction work – making young people safer, tackling violence against women and girls, and stopping ASB in hotspot locations. Its purpose is to ensure that all the work of the statutory crime reduction partnership has community input and involvement at all levels. Progress and impact of this plan will be reported there on a regular basis.

Voices of Young People

We recognize that to have the voices of young people at the heart of this work, we need to take time to build trusted relationships, and be ready to involve young people in their spaces when suits them. We know that no single approach can effectively capture the voices of all young people and young adults in the borough, and that we should involve young people in multiple places to get the best contribution. This will include but is not limited to:

- Young people at the Community Safety Engagement Board.
- Involvement of the MyEnds Young Persons Advisory Board.
- Inviting the Youth Mayor and Croydon Youth Assembly to contribute to the plan and delivery.
- Working with trusted partners to involve young people across the borough, and particularly those in the most at-risk cohorts, to be part of individual project design and development to make sure we are doing the right thing for young people.
- Work led through the Youth Justice Service including the E.M.P.I.R.E children in care and care leavers forum to ensure the voice of young people is present in our work

What are the next steps for co-production?

This plan was developed based on feedback from key individuals and organisations through several events, including:

Meeting	Target Audience
MyEnds	VCS, Schools, Community Group, Residents
Renewing New Addington (RENA)	VCS, Schools, Community Group, Residents
Youth Voice / Forum	Young People
Community Safety Engagement Board	VCS, BIDs, Faith Leaders, SNB, SNT
Faiths Together	Faith Groups
Youth Safety Listening Event	VCS, Schools, Community Group, Residents

However, this is only the start of co-production. This delivery plan is a live document that will continue to be revised and refreshed with the input of key partners from the community, young people, and their families.

Our commitments to co-production:

- We will develop sub-groups from the Community Safety Engagement Board to ensure each of the four themes has specific plans and projects from the voluntary sector and communities.
- We will ensure this plan is presented at multiple community engagement events throughout its lifespan.
- We will be honest and about its successes and failures, focusing on learning from projects that did not achieve their goals and ensuring that young people and young adults involved in projects are part of the evaluation.
- We will treat the voices of voluntary sector groups as equals in every sense, recognising their expertise, knowledge, and trusted relationships.
- We will never stop looking for better and more varied ways to include young people, their families, and their communities in projects and the overall delivery plan.

6. Measuring Impact

For the plan to succeed, we must be clear about what we are attempting to achieve and how we will measure it. This is a complex area with many interlinked elements, both short and long term, and measuring our impact is both challenging and necessary if we are to succeed.

Our top line measures

- **Reducing serious youth violence:** measured through public Police stats and reported quarterly
- **Reducing first time entrants:** measured through the Youth Justice Board and the Youth Justice Plan
- **Reducing the fear of crime for young people:** measured through annual school surveys in Croydon

Theme & project performance targets

Each of the four themes that contribute to delivering our top line measures will have specific performance targets and metrics to be developed that both measure the impact of the work. As outlined under our commitments to co-production, these will be further developed with the community and voluntary sector over the lifespan of this delivery plan. Every project intervention or action within the plan must be accompanied by a measurement of outcome and impact for it to be agreed by the delivery board where possible.

Public Health analysis & support

Although this approach is three-year delivery plan, rather than a longer-term public health strategy, it is important to recognize the expertise and value of public health led evaluation in any intervention. We will involve and work with The Director of Public Health and her senior team to ensure that the principles and tools of public health analysis are embedded throughout all our work in delivering this plan. She has identified some dedicated time of a Consultant in Public Health from November 2023 to support this work.

How will it be monitored?

Monitoring will be through the Youth Safety Delivery Board, which will then report to the Community Safety Engagement Board and the executive board of the Croydon Safer Partnership. It will also report into the Children's Safeguarding Partnership Board.

7. Action Plan

1. Prevention

We will prevent violence involving young people by ensuring all children in the borough have the best start in life. As a partnership we work with and support our communities by providing opportunities, information, and access. Prevention is about the broad early intervention work we do to stop young people being at risk of violence. It includes key areas such as:

- Sharing information amongst partners on current risks
- Broad, universal preventative work such as workshops and sessions in schools with young people
- Support for younger, primary school age young people before they become vulnerable

It is led through a combination of statutory partners, schools, commissioned, and non-commissioned voluntary sector groups working across Croydon.

Prevention Action	Lead Services / Organisations	Timescale	Why are we doing this and what will it achieve?
What we are doing			
Working with schools to help prevent robbery through smartwater marking	Met Police	Autumn 2023	Stop young people being the targets of robbery by making their items worthless to criminals
Partnership work with British Transport police to make our rail stations and tram stops safer	British Transport Police Met Police	Ongoing	Improving visible safety and awareness of safety at transport hubs across Croydon
Dedicated substance misuse board: New joint Public Health & Community Safety led board to tackle all aspects of Croydon's drug problems, including drug market supply, treatment, support etc, with additional dedicated government funding	VRN Met Police NPS Public Health Health CGL	Ongoing	Disrupting the supply and demand for drugs in the Borough which drives significant violent criminal activity

Prevention Action	Lead Services / Organisations	Timescale	Why are we doing this and what will it achieve?
What we will do			
Work with schools to identify “best practice” sessions with young people, and share across the Headteacher network	Education Services Violence Reduction Network	Autumn 2023	Ensure quality training and education on gangs and violence is spread across Croydon schools
Identify sessions specifically targeting primary school young people on the transition to secondary school	Education services Violence Reduction Network	Spring 2024	Provide preventative sessions for young people at the vulnerable point of transition to secondary school to prevent them being put at risk of violence
Improve information sharing between the wider voluntary sector and statutory services in the borough, building on the work of the community hub and gangs meetings led through the Youth Justice Service	Violence Reduction Network Met Police Children’s Services Voluntary sector YJS	Autumn 2023	Better targeting of support for vulnerable young people by improving how the different partners talk to each other and share confidential information
Improve how we update and share information with schools so that Headteachers and key safeguarding leads are aware of risks and issues in Croydon	Violence Reduction Network Children’s Services	Autumn 2023	Better enable schools to support young people at risk, and work with lead agencies in preventing young people being victims of violence outside schools
Work with Public Health to develop potential interventions for young adults aged 18 to 25 at risk of violence	Violence Reduction Network Public Health Probation	Spring 2024	Provide support to young adults who are at risk but outside the statutory role of the YJS

2. Intervention

We will identify children and young people who are at risk of becoming involved in offending and criminality. We will identify children and young people who are at risk of becoming involved in offending and criminality. A needs assessment being commissioned on behalf of the Director of Public Health looking at vulnerable people would support this by exploring the numbers and characteristics of CYP with risk factors for violence and gang related activity. We want to work with individuals and families who are at risk of exploitation and experiencing difficulties to access support services from across the partnership and the community. It is our intention to minimise the risk for the families and young people in order to help them thrive in the borough. This theme includes:

- How we identify young people and groups of young people who may be at risk
- The specific targeted services we put into place to help reduce that risk
- Information sharing amongst statutory and voluntary sector partners to help that identification
- Work led through the Youth Justice Service (YJS) to support those who have entered the criminal justice system to not offend again

It is led through a combination of statutory services, principally the YJS and the Violence Reduction Network, the Met Police, and commissioned voluntary sector organisations.

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Intervention Action	Lead Services / Organisations	Timescale	Why are we doing this and what will it achieve?
What we are doing			
Engage: New funded project based in Police custody so that every young person going into custody gets an offer of support if not charged	Met Police YJS	Ongoing	Providing support to young people who are at risk of entering the criminal justice system to prevent them becoming offenders
CLIP: Bespoke 1-2-1 interventions for young people who are just below the thresholds of criminality, to stop them entering the criminal justice system	Children's Service	Ongoing	Providing support to young people who are at risk of entering the criminal justice system to prevent them becoming offenders
Rapid response to incidents: Securing funding and deploying local trusted community groups into areas following an incident within 48 hours to provide reassurance and preventing escalation	VRN Met Police	As needed	Preventing reprisal attacks following an incident, and routes into support and diversionary activity for young people affected by an incident

Intervention Action	Lead Services / Organisations	Timescale	Why are we doing this and what will it achieve?
Using local intelligence to review every high-risk child to ensure services are being accessed and appropriate actions being taken. Identifies physical spaces that are at risk and develops partner plans for each area	Children's Services	Ongoing	Identify the young people most at risk and develop specific and targeted interventions for those deemed vulnerable
Externally funded Targeted Outreach: Working with local trusted partners we have enhanced youth outreach for 6 months in Shrublands, Croydon Town Centre, and New Addington to make sure there are youth workers on the streets for young people.	VRN VCS Met Police	Ongoing	Provide additional on street youth workers for the most vulnerable locations in the borough, to provide one to one and group interventions for young people who are at risk of becoming victims or offenders
Mentoring: externally funded service for young people who are entering the criminal justice system for the first time	YJS Mentivity Reaching Higher	Ongoing	Reduce the re-offending rates of young people in the criminal justice system
Turnaround Project: Working with young people and their families identified at being of risk of criminality and offering preventative intervention	YJS	Ongoing	Reduce first time entrants in to the criminal justice system
Physical health nurse and a specific "Sexual Health Offer" to work with individuals known to YJS	YJS Health	Ongoing	Provides additional support to young people in the criminal justice system, and specifically looks at those who have been injured by serious youth violence.
Integrated Offender Management scheme for young people: Oversight of all children & young people who are deemed a serious risk to the public, or prolific offenders. High level monitoring of young people. All children & parents on the IOM scheme are informed.	YJS NPS Met Police VRN Education services	Ongoing	Reduce the re-offending rates of young people in the criminal justice system, and prevent offending by those identified as most at risk
Youth Justice Service employing young people on a six-month basis to gain employment skills and qualifications	YJS Skill Mill	Ongoing	Reduce the re-offending rates of young people in the criminal justice system

Intervention Action	Lead Services / Organisations	Timescale	Why are we doing this and what will it achieve?
What we will do			
Explore options for specialist service support for those young people and young adults not in education, training or employment.	Violence Reduction Network Public Health Probation	Spring 2024	Provide support to young adults who are at great risk due to being NEET
Review our referral pathways and information sharing to ensure that we effectively intervening where possible for young people at risk	Croydon Council Police Voluntary Sector	Autumn 2023	Making sure that we aren't duplicating work or wasting resources, and that we effectively identify and support vulnerable young people rapidly

3. Disruption

We will act against individuals identified who are causing harm in our communities and having a detrimental impact on others. We will target those who are exploiting young and/or vulnerable people to prevent harm to potential victims and protect the public. This work includes:

- Targeted operations to disrupt and take down criminal gangs
- Work to take weapons off the streets, including illegal knife sales
- How we use and deploy the resources we have to best tackle violence and violent offenders
- Work to rebuild trust and confidence in the police, as only with the support of young people and their communities can disruption operations be successful

This work is primarily Police led, with support from other statutory agencies. Work to address trust and confidence will be delivered in partnership with communities, particularly the Black African and Afro-Caribbean community.

Disruption Action	Lead Services / Organisations	Timescale	Why are we doing this and what will it achieve?
What we are doing			
Improved partnership working, particularly with neighbouring boroughs, to better manage high risk individuals who cross borough boundaries	YJS VRN Met Police	Ongoing	Better understand and target individuals who operate across borough lines
Injunction: apply for relevant court orders to include both prohibitions (which require a respondent to refrain from doing something) and positive requirements (where the respondent may be required to take certain steps or participate in specified activities) to address behaviour.	YJS VRN Met Police	Ongoing	Target individuals who pose a risk to our communities through non-custodial sentencing and use of positive requirements where possible to stop offending
Apply for Criminal Behaviour Orders in relation to individuals that have been identified as causing harm in	VRN Met Police	Ongoing	Target individuals who pose a risk to our communities through non-custodial sentencing

Disruption Action	Lead Services / Organisations	Timescale	Why are we doing this and what will it achieve?
our communities and are involved in criminal prosecutions.			and use of positive requirements where possible to stop offending
Seek a Premises Closure Order where properties have been identified as linked to crime and ASB	VRN Met Police	Ongoing	Close properties and businesses who create an unsafe environment for young people
Dedicated robbery patrols to help prevent robbery, especially of young people, in key locations	Met Police	Ongoing	Reduce rates of robbery amongst young people
Public Space Protection Order (PSPO) to tackle anti-social behaviour in hotspots	Met Police VRN	Ongoing	Reduce anti-social behaviour by young adults and increase feelings of safety in key areas
Upgrade of CCTV network cross Croydon to both deter crime and help the Police catch offenders	VRN	Ongoing	Support police enforcement action to identify and arrest violence offenders
Additional policing presence in Croydon Town Centre to help tackle violence against women and girls. Includes dedicated ring fenced resource	Met Police	Ongoing	Increase enforcement action in the town centre and increase feelings of safety through visible policing
What we will do			
Work with New Scotland Yard to increase on street presence in vulnerable locations, particularly Croydon Town Centre	Met Police Croydon Council	Autumn 2023	More visible deterrence and enforcement against criminals and those looking to exploit or attack young people
Work with New Scotland Yard to implement longer term gang disruption operations in Croydon to tackle the drugs market that drives violence in the borough	Met Police	Ongoing	Long term, specialist work is needed to take apart the criminal gangs supplying the drugs markets in Croydon that drives violence in the borough
Implement a pilot program to improve oversight of police powers and usage in Croydon, with a dedicated role for young people and for the Black community	Met Police Croydon Council	Autumn / Winter 2023	Improve trust and confidence in the Police by creating greater public oversight of their actions and use of powers, including stop and search
Improve training for new police officers in the borough by building on existing community trainers	Met Police Voluntary Sector	Winter 2023	Build on the existing community training for new Police Officers to incorporate more elements on young people and their experiences

Disruption Action	Lead Services / Organisations	Timescale	Why are we doing this and what will it achieve?
Work to tackle online knife sales that put dangerous weapons in the hands of young people	Croydon Council Met Police	Autumn / Winter 2023	Prevent young people accessing weapons more likely to cause injury and death

4. Diversion

We know that having a range of diverse activities and events for young people helps keep young people off the streets and engaged in positive activities. By continuing to offer, with our partners, as many diversionary activities as possible we can provide a positive alternative for young people in Croydon. This work includes:

- The council and other partners offer for young people activities in Croydon
- The many clubs and activities delivered by the voluntary sector across the borough
- Unlike other areas of the plan, this is broad based and may not have specific performance measures as it provides a broad range of activities for young people
- A large part of this work is providing alternatives for young people so that they are off the streets and in safe spaces and places where they can engage in positive activities

Diversion Action	Lead Services / Organisations	Timescale	Why are we doing this and what will it achieve?
What we are doing			
Holiday Activity Fund (HAF): provide funded holiday activities clubs with healthy meals for children who are claiming free school meals	Children's services	Ongoing	Providing healthy meals and activities to young people on free school meals as diversionary activity to give young people something to do
Provide supplementary externally funded grants for high risk areas to offer holiday activities in Croydon Town Centre, New Addington, and Thornton Heath	Violence Reduction Network	Ongoing	Additional summer activities for young people during school holidays, including back to school period
Upgrade work over 2023/24 to upgrade our cricket, tennis and football pitches in Croydon, including creating new Playzones in Croydon	Culture, Leisure & Libraries team Palace for Life CVA	Ongoing	Providing a range of sport and physical exercise options for young people in Croydon to give them something to do

Diversion Action	Lead Services / Organisations	Timescale	Why are we doing this and what will it achieve?
Kids swim for £1 – summer offer of discounted entry into sports centres	Culture, Leisure & Libraries	Ongoing	Cheaper swimming sessions for young people aged 11 to 17 to give them something to do
Summer Reading Challenge: working with Youth Sports Trust to encourage reading and sport across summer in local libraries	Culture, Leisure & Libraries	Ongoing	Activities in libraries for young people aged 4 to 11
Youth Engagement summer program: two-and-a-half-week summer program at Samuel Coolridge-Taylor centre for 8 to 16 year olds	Children's Services	Ongoing	Sports, arts, crafts, gaming and other activities
London Borough of Culture: range of young person activities and events across 2023/24	Culture, Leisure & Libraries	Ongoing	Range of outdoor and indoor cultural events ranging from music to visual arts, with specific youth elements and events
Croydon Music and Arts: music and vocal training for young people, including opportunities to perform, join a band, and celebrate young people's talents	Croydon Music and Arts	Ongoing	Support and tuition for young people to learn music and perform, that includes partner work and modern music types
What we will do			
Work with voluntary organisations to ensure there is a single up to date listing to promote all activities on offer for young people in Croydon	Children's Services Voluntary Sector Digital Services	Autumn 2023	Increase awareness and access to diversionary activity for young people
Work with MOPAC to continue to secure additional funding to enable extra activities in high-risk areas	Violence Reduction Network	Spring 2024	Bring additional resources in that allow us to help the young people most at risk
Work with our Sports & Leisure providers to increase access and activities for young people	Culture, Leisure & Libraries	Summer 2024	Improve access to sports and leisure facilities in Croydon
Ensure the legacy of the London Borough of Culture has specific elements for young people	Culture, Leisure & Libraries	Summer 2024	Continue to build on the success of LBOC and the role of young people and their talent in our creative and cultural landscape, providing opportunities for young people

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Equality Analysis Form

1. Introduction

1.1 Purpose of Equality Analysis

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

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

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

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

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

2. Proposed change

Directorate	Sustainable Communities, Regeneration & Economic Recovery Department
Title of proposed change	Youth Safety Delivery Plan
Name of Officer carrying out Equality Analysis	Kristian Aspinall

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Briefly summarise the proposed change and why it is being considered/anticipated outcomes. What is meant to achieve and how is it seeking to achieve this? Please also state if it is an amendment to an existing arrangement or a new proposal.

The Youth Safety Delivery Plan is a three-year action plan aimed at improving young people's safety on our streets and reducing violence against young people. It does this through a combination of preventative actions, interventions, targeted disruption, and diversionary activity. It is a combination of existing work that has been developed and implemented over the last 12 months and new proposals.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Deciding whether the potential impact is positive or negative

Table 1 – Positive/Negative impact

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	<p>The plan is aimed at making young people aged 11 to 25 safer on our streets. It will have a positive impact through:</p> <ul style="list-style-type: none"> - Providing more preventative work that stops violence happening in the first place - Put into place targeted interventions for young people most at risk to reduce the chance of them being victims of violence - Target the adults who exploit young people - Provide diversionary activity to encourage young people into positive activities 	N/A	MetStats (statistical system owned by the Metropolitan Police) and the Greater London Authority (GLA).

Disability	Data does not show any disproportionality amongst the victims of youth violence and their disability status.		
Sex	<p>Most victims of youth violence are boys and young men. By working to reduce this crime, this will have a positive impact on the lives of young men and boys in Croydon.</p> <p>Most of the people engaged in exploitation of young people are men, and the additional disruption activity outlined in this plan will increase enforcement and police activity against those who exploit young people. This is an intended consequence of the plan, and will lead to a greater positive impact for young men as a whole in the borough.</p>		
Gender Reassignment	There is no available evidence on gender reassignment and youth violence.		
Marriage or Civil Partnership	There is no available data on the marriage or civil partnership status of victims of youth violence, and a significant number of the victims are unable to be married.		
Religion or belief	Data is not collected.		
Race	<p>Most of the victims of youth violence are Black African and African-Caribbean. The activities outlined in the plan will improve their safety and life outcomes.</p> <p>In addition, the work outlined under the Disruption strand to rebuild relationships between Police and the Black community, and to improve public oversight of the police and their actions, will have a positive impact on community relations in Croydon.</p>		
Sexual Orientation	There is no available data on the sexual orientation of the victims or perpetrators of serious youth violence.		No data available
Pregnancy or Maternity	There is no available data on the pregnancy or maternity status of victims or perpetrators of serious youth violence.		No data available

Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

3.2 Additional information needed to determine impact of proposed change

Table 2 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:		
Additional information needed and or Consultation Findings	Information source	Date for completion
Throughout the lifespan of the delivery plan we will continually engage with young people, people from the Black African and African-Caribbean community and third sector organisations to ensure our work is delivering the intended aims and to ensure that co-production and the voice of young people features throughout. The consultation process we have followed to develop this strategy is outlined in section, and has included multiple meetings with different groups and young people across Croydon in the last 12 months. Our commitments to continue this process of consultation, engagement and involvement throughout are also listed in this section. The findings from this early consultative work have been directly incorporated into the delivery plan.	See section 5	Throughout the lifespan of the strategy

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

S e	3	3	6	9
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	2	2	4	6
	1	1	2	3
		1	2	3
Likelihood of Impact				

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Equality Analysis

Table 3 – Impact scores

Column 1 PROTECTED GROUP	Column 2 LIKELIHOOD OF IMPACT SCORE Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Column 3 SEVERITY OF IMPACT SCORE Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Column 4 EQUALITY IMPACT SCORE Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group. Equality impact score = likelihood of impact score x severity of impact score.
Age	3	2	6
Disability	1	1	1
Gender	3	2	6
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	3	2	6
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	1	1	1

Equality Analysis

4. Statutory duties

4.1 Public Sector Duties

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

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

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

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

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5. Action Plan to mitigate negative impacts of proposed change

Important note: Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

Table 4 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	N/A			
Race	N/A			
Sex (gender)	N/A			
Gender reassignment	N/A			
Sexual orientation	N/A			

Equality Analysis

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

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter X in column 3 (Conclusion) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	<p>Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</p> <p>This plan will actively work to address inequality in Croydon – it is a stated goal and intended consequence of the work. It recognizes existing inequality and disproportionality and aims to improve in all those areas. It has a specific goal around Police / Community relations which directly links to the long-standing disproportionality suffered by the Black community by Police in terms of stop and search and use of Police powers, which will directly improve inequality in the borough.</p>	X
Adjust the proposed change	<p>We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</p>	
Continue the proposed change	<p>We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.</p>	

Equality Analysis

Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet	Meeting title: September Cabinet 2023	

7. Sign-Off

Officers that must approve this decision		
Equalities Lead	Name: Naseer Ahmad	Date: 17/08/2023
	Position: Senior Equalities Officer	
Director	Name:	Date:
	Position:	

LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	27 SEPTEMBER 2023	
REPORT TITLE:	Report on 10 Experimental Healthy School Streets Schemes (Group 2)	
CORPORATE DIRECTOR / DIRECTOR:	Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration & Economic Recovery	
LEAD OFFICER:	Jayne Rusbatch, Head of Highways and Transport	
LEAD MEMBER:	COUNCILLOR SCOTT ROCHE, CABINET MEMBER FOR STREETS & ENVIRONMENT	
KEY DECISION?	Yes	Key Decision reference: 1923EM REASON: Decision significantly impacts on communities living or working in an area comprising two or more Wards
CONTAINS EXEMPT INFORMATION?	No	
WARDS AFFECTED:	MULTIPLE (Bensham Manor, Broad Green, Crystal Palace & Upper Norwood, Norbury Park, Old Coulsdon, Purley Oaks & Riddlesdown, Sanderstead, South Croydon, Woodside)	

1. SUMMARY OF REPORT

This report provides the Executive Mayor of Croydon and Cabinet with recommendations for the future of the 10 Experimental Traffic Orders (ETOs) covering 10 Healthy School Streets (Group 2) that were implemented on April 25, 2022, for a period of 18 months which included a 6-month statutory objection period, from 25 April 2022 to 25 October 2023.

This group of Healthy School Streets were originally introduced in 2020, following an informal consultation exercise, and to provide context, the results of this exercise are included in this report. Following this informal exercise, this group of schemes was introduced as an ETO in October 2020, and due to the impacts of Covid and lack of supporting data were reintroduced under new ETOs in April 2022.

During the first 6 months of the current experimental order, the council sought the views of the local community via statutory consultation and encouraged them to provide feedback through the Get Involved online survey. Monitoring the impact of the proposals

was integral to the process during the experiment, and the council carried out traffic surveys and air quality monitoring in the school streets and neighbouring streets to assess the traffic impact.

The table below lists the 10 Healthy School Street schemes:

Ref	School	Affected Road(s)	Ward
HSS 1	Ecclesbourne Primary School	Atlee Close	Bensham Manor
HSS 2	St Thomas Becket Catholic Primary School	Dickenson's Lane	Woodside
HSS 3	Harris Primary Academy Haling Park	Haling Road	South Croydon
HSS 4	Keston Primary School	Keston Avenue	Old Coulsdon
HSS 5	Downsview Primary School	Marston Way	Norbury Park
HSS 6	Christ Church CofE Primary School	Montpelier Road	Purley Oaks & Riddlesdown
HSS 7	Oasis Academy Ryelands	Sandown Road & Oakley Road	Woodside
HSS 8	Ridgeway Primary School	Southcote Road	Sanderstead
HSS 9	Harris Primary Academy Croydon	Thomson Crescent & Chapman Road	Broad Green
HSS 10	St Joseph's Catholic Junior School	Woodend	Crystal Palace & Upper Norwood

This report together with the supporting appendices presents the outcome of the engagement and statutory consultation for the 10 experimental orders in the Healthy School Streets schemes.

2. RECOMMENDATIONS

For the reasons set out in the report and its appendices, and having due regard to the outcome of the consultation, the equalities considerations as set out in section 10.3 and the section 122 Road Traffic Act 1984 considerations as set out in section 5, the Executive Mayor in Cabinet, is recommended:

- 2.1 To make the following 9 experimental traffic orders, which form the healthy school streets schemes (No. 1-3 and 5-10) detailed within this report, permanent:

School	Affected Road	Section	ETMO Cited As	Ref
Ecclesbourne Primary School	Atlee Close	Entire length of	The Croydon (Traffic Movement) (No.2) Experimental Order 2022	2022/19
Harris Primary Academy Croydon	Thompson Crescent and Chapman Rd	Chapman Road Between Kingsley Road and Fairmead Road, Thomson Crescent Between Kingsley Road and Euston Road	The Croydon (Traffic Movement) (No.3) Experimental Order 2022	2022/20
St Thomas Beckett Catholic Primary School	Dickenson's Lane	Entire length of road	The Croydon (Traffic Movement) (No.4) Experimental Order 2022	2022/21
Harris Primary Academy Haling Park	Haling Rd	Between the north to south arm of Haling Road and Selsdon Road	The Croydon (Traffic Movement) (No.5) Experimental Order 2022	2022/22
Downsview Primary School	Marston Way	Entire length of road	The Croydon (Traffic Movement) (No.7) Experimental Order 2022	2022/24
Christ Church CofE Primary School	Montpellier Rd	Between Brighton Road and the common boundary of Nos. 84 and 86 Montpelier Road	The Croydon (Traffic Movement) (No.8) Experimental Order 2022	2022/25
Oasis Academy Ryelands	Sandown and Oakley	Oakley Road entire length of, Sandown entire length of	The Croydon (Traffic Movement) (No.9) Experimental Order 2022	2022/26
Ridgeway Primary School	Southcote Rd	southcote Rd: between The Ridgeway and the westernmost junction with Ellenbridge Way	The Croydon (Traffic Movement) (No.10) Experimental Order 2022	2022/27
St Joseph 's Catholic Primary Junior School	Woodend	Entire length of road	The Croydon (Traffic Movement) (No.11) Experimental Order 2022	2022/28

- 2.2 To withdraw The Croydon (Traffic Movement) (No.6) Experimental Order 2022 effective as of 21 October 2023 in respect of the Keston Healthy School Street in Keston Avenue and not to proceed to make it permanent; and to authorise the Corporate Director of Sustainable Communities, Regeneration and Economic Recovery to take steps necessary to publicise this withdrawal and remove any associated signage and other measures in place as a result of the experimental order.
- 2.3 Subject to approval of recommendation 2.1 above, to delegate authority to the Corporate Director of Sustainable Communities, Regeneration and Economic Recovery to undertake all measures necessary to make the 9 experimental orders permanent Traffic Management Orders, including pursuant to the statutory requirements of the Road Traffic Management Act 1984 and Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 and make arrangements for the enforcement thereof.

3. REASONS FOR RECOMMENDATIONS

- 3.1 For the reasons set out below and detailed within this report and supporting appendices, officers conclude that 9 of the 10 Experimental Traffic Orders comprising 9 Healthy School Streets are implemented permanently and 1 is withdrawn.
- 3.2 The 9 schemes recommended to be made permanent meet and support several of Croydon's strategic transport objectives as per the Local Implementation Plan, along with those within the Executive Mayor of Croydon's Business Plan and lastly the Mayor of London Transport Strategy.

4. BACKGROUND

- 4.1 Croydon intends to ensure that the borough has a cleaner, sustainable recovery from the pandemic, encouraging healthier travel helping us to deliver 1) the Mayor of Croydon Business Plan and 2) The Mayor of London Transport Strategy at a local level. This is aimed at addressing the challenges and opportunities coming out of the pandemic around climate change, congestion, road safety issues and poor air quality.
- 4.2 The overarching policy objectives for School Streets and their source references are documented in the Parking Policy 2019-2022. In summary:
- The Third Local Implementation Plan (LIP3) reflects local plans and The London Mayor's strategy, including that all local Councils must help children and parents to use cars less and to walk, cycle and use public transport more.
 - The Director of Public Health's annual report 2017 called for action on air pollution and inactivity. It identifies that Croydon has the highest rate of hospital admissions for childhood (0-9 years) asthma and the third highest number of asthma deaths in London. 205 premature deaths in Croydon are linked to air pollution. There are further health concerns associated with 40% of children and 60% of adults in Croydon being overweight.
 - The level of Croydon residents who regularly travel by active modes (walking and cycling) is lower than in each of our neighbouring 6 boroughs. Only 26% of

Croydon residents undertake the minimum 20 minutes of active travel each day needed to stay healthy.

- Healthy School Street Programmes are a direct result of central government enacting national policies to increase active travel through walking and cycling, in turn capturing the health benefits attributed to these sustainable modes. National policies have been adopted by regional government and local government to create a sea of change in reducing non-essential motorised travel through towns and cities. These are also linked to other policy drivers to curb the level of pollutants and to decrease the level of child obesity.

- 4.3 Several school streets have reached saturation point at the start and end of school days – meaning that in the most severe places there is no road space left for the problem to worsen. What is changing, however, is the awareness of and attitude towards air pollution. In Croydon's online public engagement survey conducted in September 2018¹, 86% of 994 respondents agreed that traffic levels are too high in Croydon and 72% agreed it should be lowered. 74% agreed they are concerned about air quality. 62% agreed they would use the car less if the alternatives were better. 57% agreed they would walk more and 39% would cycle more if conditions were right.
- 4.4 Healthy School Streets are not an isolated device. It supports the educational and information efforts of the Council's Road Safety and School Travel Planners, including their coordination with the TfL STARS and Living Street's WoW Travel Tracker initiatives. STARS aims to inspire young Londoners to travel to school sustainably, actively, responsibly, and safely by championing walking, scooting and cycling. Living Streets is a charity that inspires the nation to walk more. WOW is a pupil-led initiative where children self-report how they get to school every day using the interactive WOW Travel Tracker.
- 4.7 For further information on the policy objectives and the evidence in support for implementation of Healthy School Streets please refer to sections 2 – 3 of the Schools Streets Traffic Management Advisory Committee Report (TMAC) dated May 2019, which can be found [here](#).

Results of the informal consultation 2020

- 4.8 To inform the rollout of the ongoing school street programme, in 2020 an informal consultation exercise was undertaken, which is set out below.
- a) 2679 leaflets were posted to various addresses for the batch of 10 schools as detailed in this report between 9 January 2020 and 5 February 2020 within a 300 metre distance from each school.
 - b) In brief 457 letters were received by the council giving a response rate of 17%. The analysis identified that within the zone of influence of the schools, that is from the specific school streets, 87% of all those who responded were supportive and 13% opposed.
 - c) Outside of the zone (i.e. beyond the school streets locations) only 35% were supportive and 65% against due to potential traffic displacement. On the basis of the outcome of this informal consultation, a decision was taken to put in place 10 experimental traffic

orders in order to test whether or not the orders could deliver the desired outcomes for the 10 healthy school street schemes.

Specific to Keston School the informal consultation indicated the following:

- d) Within the proposed scheme area: 75% response rate with 100% in favour
 Outside of the proposed scheme area: 25% response rate and 72% strongly opposed.
 Those who strongly opposed the scheme were from Court Avenue where there is a perceived traffic problem without the proposed scheme, and that introduction of a scheme would add to their issues of rat running.

The table below outlines details of the informal consultation outcome carried out in 2020 per scheme.

All 11 school proposals			Opinions		
Distance	Letters	Responses	No	Yes	Unsure
Inside Zone	616	160 26%	21 13%	139 87%	0 0%
Less than 100m outside	702	94 13%	57 61%	35 37%	2 2%
More than 100m outside	1361	203 15%	130 64%	69 34%	4 2%
Total	2679	457 17%	208 46%	243 53%	6 1%

Christ Church CofE Primary			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Inside Zone	68	15 22%	2 13%	13 87%	0 0%	Respondents from addresses both inside and outside the zone are in favour of a School Street. Low response rate from addresses outside the suggested zone. Some concern about a conflict with the temporary one-way system (due to end June 2020).
Less than 100m outside	85	6 7%	2 33%	4 67%	0 0%	
More than 100m outside	142	8 6%	4 50%	4 50%	0 0%	
Total	295	29 10%	8 28%	21 72%	0 0%	

Downsview Primary School, Marston Way			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Inside Zone	126	20 16%	5 25%	15 75%	0 0%	Relatively low response rate, with just 5 respondents from outside the zone (vs 20 from inside). There are strong expressions of support from inside the suggested zone. There are equally strong opposition from outside the zone, although the statistically lower significance should be noted.
Less than 100m outside	26	4 15%	3 75%	1 25%	0 0%	
More than 100m outside	17	1 6%	1 100%	0 0%	0 0%	
Total	169	25 15%	9 36%	16 64%	0 0%	

Ecclesbourne Primary School			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Inside Zone	52	13 25%	4 31%	9 69%	0 0%	Respondents from addresses both inside and outside the zone are significantly in favour of a School Street; but with just 7 respondents from the outside the suggested zone.
Less than 100m outside	80	2 3%	1 50%	1 50%	0 0%	
More than 100m outside	132	5 4%	1 20%	4 80%	0 0%	
Total	264	20 8%	6 30%	14 70%	0 0%	

Harris Academy Purley Way			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Inside Zone	64	8 13%	0 0%	8 100%	0 0%	Low response rate overall. Respondents refer to wider parking issues in the Propeller Crescent off-street parking place.
Less than 100m outside	14	0 0%	0 0%	0 0%	0 0%	
More than 100m outside	54	3 6%	1 33%	2 67%	0 0%	
Total	132	11 8%	1 9%	10 91%	0 0%	

Harris Primary Academy Hailing Park			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Inside Zone	27	14 52%	1 7%	13 93%	0 0%	High response rate and strongly in favour from within the proposed zone. Majority of responses outside the proposed zone are in favour; but with a relatively low response rate.
Less than 100m outside	98	9 9%	3 33%	5 56%	1 11%	
More than 100m outside	27	1 4%	0 0%	1 100%	0 0%	
Total	152	24 16%	4 17%	19 79%	1 4%	

Keston Primary School			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Inside Zone	12	9 75%	0 0%	9 100%	0 0%	Very high response rate and 100% in favour from within the suggested zone. Relatively high response rate from outside the zone and strongly against. Residents in Court Avenue accounts for half the responses from outside the zone and they raise the concern that traffic and parking conditions are already intolerable. 14% of Court Avenue respondents said they would support the scheme if it is extended to their road. This is discussed below.
Less than 100m outside	90	25 28%	21 84%	3 12%	1 4%	
More than 100m outside	234	56 24%	37 66%	17 30%	2 4%	
Total	336	90 27%	58 64%	29 32%	3 3%	

Kingsley Primary Academy			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Inside Zone	55	6 11%	0 0%	6 100%	0 0%	Overall low response rate. Respondents from outside the suggested zone complain about commuter parking from the nearby industrial Factory Lane and they are concerned about additional displacement from a School Street. 10% of respondents (all living within 300m distance) commented that they must drive their child to Kingsley Primary school for road safety reasons.
Less than 100m outside	103	7 7%	5 71%	2 29%	0 0%	
More than 100m outside	196	22 11%	15 68%	7 32%	0 0%	
Total	354	35 10%	20 57%	15 43%	0 0%	

Oasis Academy Ryelands			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Inside Zone	134	40 30%	7 18%	33 83%	0 0%	Highly favourable response rate from within the suggested zone. Neighbouring Watcombe Road and Ferndale Road have 14% high response rate and are 76% against a scheme. Residents in the 2 roads complain that traffic and parking conditions are already intolerable and they are concerned about displacement. 12% of Ferndale Road respondents said they would support the scheme if it is extended to their road. 7% of respondents have stated the area also needs controlled parking.
Less than 100m outside	79	3 4%	2 67%	1 33%	0 0%	
More than 100m outside	193	26 13%	20 77%	6 23%	0 0%	
Total	406	69 17%	29 42%	40 58%	0 0%	

Ridgeway Primary School			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Inside Zone	13	11 85%	1 9%	10 91%	0 0%	Very high response rate and 91% in favour from within the suggested zone. High response rate from outside the zone and overall against. Respondents from Ellenbridge Way and Elmfield Way in particular are concerned about displacement and several respondents express a dislike for traffic restrictions in general.
Less than 100m outside	27	20 74%	12 60%	8 40%	0 0%	
More than 100m outside	158	56 35%	36 64%	18 32%	2 4%	
Total	198	87 44%	49 56%	36 41%	2 2%	

St Joseph's Catholic Junior School			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Inside Zone	26	11 42%	0 0%	11 100%	0 0%	High favourable response rate from within the suggested zone. Mixed response from outside the zone. Bradley Road has a history of rat running and its respondents say the pre-existing one-way system is complicated enough. 18% of opponents in Bradley Road say they would support the School Street if it was extended to Bradley Road.
Less than 100m outside	53	15 28%	7 47%	8 53%	0 0%	
More than 100m outside	153	18 12%	10 56%	8 44%	0 0%	
Total	232	44 19%	17 39%	27 61%	0 0%	

St Thomas Becket Catholic Primary			Opinions			Summary of responses
Distance	Letters	Responses	No	Yes	Unsure	
Inside Zone	39	13 33%	1 8%	12 92%	0 0%	High favourable response rate from within the suggested zone. Low response rate overall opposed from outside the zone. Respondents in Birchanger Road are concerned about pre-existing school time problems and displacement.
Less than 100m outside	47	3 6%	1 33%	2 67%	0 0%	
More than 100m outside	55	7 13%	5 71%	2 29%	0 0%	
Total	141	23 16%	7 30%	16 70%	0 0%	

4.9 The schemes were originally introduced through a single Experimental Traffic Management Order published on 1 September 2020 that expired on 28 February 2022. The council was of view that upon the expiry of the first ETO in February 2022 it was not possible for the council to take a decision on the future of the mentioned 10 schemes for the following key reasons:

- The 6-month statutory consultation period coincided with the closure of schools during periods of COVID lockdown from 13 December 2020 to 8 March 2021.
- The schemes did not coincide with "business as usual" traffic conditions due to the ongoing pandemic and resulting lockdowns during the experimental period.
- Enforcement of the schemes was sporadically suspended.
- Infrastructure delays resulted in some of the school street signage not being implemented in time for the ETO go live date without which the ETO is rendered invalid.

4.10 For the above reasons the council took the decision on 21 March 2022 to re-run the 10 experiments under new ETOs from April 2022 as the council was of the view that those affected by the experiments may not have had sufficient opportunity to experience their true effects. Further information in relation to the decision made and background can be found by viewing the committee papers [here](#).

5. DETAILS

- 5.1 The purpose of the current Experimental Orders which are the subject of this report, was to test whether the orders improve road safety, reduce pollution and encourage people to walk more in the 10 school street scheme areas, whilst not materially negatively impacting on access to premises on the school streets. The Orders have been introduced experimentally so that the effectiveness in achieving these aims can be assessed before a decision is made as to whether to make it permanent. The Experimental Orders introduced 10 separate school pedestrian zones into the roads as listed in paragraph 2.1, which prohibit any motorised vehicle (with the exception of vehicles being used for police, ambulance or fire service purposes, liveried vehicles providing a universal postal service or vehicles in the service of the local authority being used in pursuance of statutory powers or duties) entering these streets/sections of streets between 8am and 9.30am and between 2.00pm and 4pm, Monday to Friday during school term time. An exemption applies for those holding a valid permit issued by the Council for that pedestrian zone including blue badge holders.
- 5.2 In making the recommendations, officers have assessed the considerations which arise as a result of the council's duties under section 122 of the Road Traffic Management Act 1984 ("RTRA") and officers' analysis of how and the degree to which these considerations will be met through the recommendations in this report is set out below. The Council must exercise its powers under the RTRA (including making experimental traffic orders permanent or deciding to withdraw experimental traffic orders) so as to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway. In making decisions in this regard, the Council must have regard to:
- The desirability of securing and maintaining reasonable access to premises;
 - The effect on the amenities of any locality affected and the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
 - The national air quality strategy;
 - The importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
 - Any other matters appearing to the local authority to be relevant.
- 5.3 Of particular relevance, given the aims of Healthy School Streets, are the objectives to:
- ensure safe passage for vehicles and pedestrians (road safety);
 - encourage modal shift to active travel modes to improve air quality to support the council's statutory duties in relation to the national air quality strategy; and
 - secure and maintain reasonable access to premises and impact on passage of public service vehicles;
- 5.4 Taking in turn the statutory requirements as set out above, officers consider that the recommendations in the report support the section 122 requirements in the following respects:
- a) **Road Safety:** In general, road safety can be measured by a reduction in risk (and correspondingly in collision injuries) through measures introduced and/or reduced road danger through the reduction of traffic volume. The pedestrian zone school street

restrictions at school pick up and drop off times, mean that traffic is dissipated over a larger local area, and associated with this there is a reduction in road danger, as opposed to a concentration of traffic within a smaller section of road space outside of the school entrances.

The Council has carried out traffic analysis along various streets within this programme through the installation of traffic count tubes across the road to monitor two-way traffic movements and traffic speeds over a 24-hour period, and Vivacity Artificial Intelligence (AI) traffic monitors to determine changes in traffic on surrounding roads. Appendix B summarises these results, with the results showing a reduction of traffic volume on the school streets during the restricted times, in comparison to outside of the restricted times during the same period.

The analysis of traffic flow data in this report shows a traffic reduction for all school streets (and hence reduction in road risk) with the exception of Court Avenue. Keston Primary has a secondary school entrance on Court Avenue, where we have seen recorded traffic volumes increase in the AM Peak period. Whilst in other locations school and local traffic could dissipate across the wider local area, for Court Avenue the surrounding road network is such that it forms an alternative route between Coulsdon Road and Keston Avenue, meaning that traffic displaced from the restricted section of Keston Avenue is concentrated in Court Avenue, thereby increasing road danger risk.

It is expected that traffic volumes within the immediate local area to the 9 school streets recommended to be made permanent, will continue to decrease over time, based on behavioural change. These behavioural changes can be difficult to quantify during an experimental period when parents may assume that measures introduced may not be made permanent especially if there is strength of feeling against specific measures. A reduction of parents dropping off their children by car in specific school streets is not a determinant factor that behaviour has changed, it can be that parents choose to drive to neighbouring streets and walk to collect their children. Detailed research over time in collaboration with the schools is required to quantify the change in behaviour.

- b) **Reduce Pollution and national air quality strategy:** The school street pedestrian zones exclude motorised vehicles and this could mean improvement to the air quality, due to a reduction in car borne pollutants, attributed to a reduction in the volume of traffic using a specific section of road. Caution needs to be applied to this assumption as pollution levels depend on many other factors including weather conditions, etc and are not a single source measurement over a short duration.

Air quality monitoring equipment has been installed at all school street locations, and whilst it is too early to comment fully on pollution levels indicated by recent Breathe London monitoring data collected during the last week of July 2023 (refer to Appendix C), an initial review shows that levels are as would be expected at the 15 monitoring sites, with data seeming to be reliable and accurate. Under the Environment Act 2021 the government has set a target to reduce Particulate Matter (PM2.5) to an annual mean concentration target for PM2.5 of 10 µg/m³ across England by 2040. Recorded pollution levels in the school street monitoring locations are initially indicated to be well within this UK objective for Particulate Matter (PM2.5). Given the complexities of air quality monitoring, further monitoring over a longer period (ideally 12 months) will be undertaken before any conclusive and extensive opinion can be given. However, given the increase in traffic volumes in Court Avenue which are not dissipated across the

network in the same way as for the other 9 school street schemes, there is potential for there to be a detrimental impact on air quality, and this further supports the removal of the school street scheme for Keston School.

c) **Secure and maintain reasonable access to premises and facilitating passage of public service vehicles**

The school street pedestrian zone restrictions operate whilst school is in session during both the drop off period (0800 to 0930) and pick up period (1400 to 1600) and do not operate during school or public holidays. The council appreciates that the restrictions may cause inconvenience and has considered the need for access to the school streets during these times. To mitigate access issues, the council has in place a suite of permits and exemptions to provide access for various users free of charge. This includes exemptions for parents/carers of children with disabilities, blue badge holders and builders/ tradespersons visiting premises during the hours of operation. Residents are encouraged to arrange deliveries and visits outside of the operational hours. However, the council can consider special access requests on a case-by-case basis, for example for those with medical circumstances requiring carers during the hours of operation and/or being collected by taxis for hospital appointments.

For some working parents that drop off their children enroute to their place of work, access to the school street itself will remain restricted. This is because safety of children who do walk and cycle to school is considered to be of a greater priority. Motorised vehicle access for parents is not permitted to minimise the number of vehicles entering/exiting the school street during busy periods, unless they are parents/carers of children with disabilities.

- 5.5 Highways officers have considered the requirements of the Regulation 9 of the Local Authorities Traffic Orders (Procedures) (England and Wales) Regulations 1996 and are of the view that there is no statutory requirement to hold a public inquiry in light of the nature of the proposed permanent orders nor do the objections in respect of the 9 experimental orders proposed to be made permanent, indicate that such an inquiry is appropriate.

6. ALTERNATIVE OPTIONS CONSIDERED

Option 1: not proceeding with making the 9 schemes permanent.

- 6.1 Officers are of the view that not making the 9 recommended schemes permanent would be a missed opportunity to improve the quality of the environment within close proximity of schools, hence not delivering an element of the Executive Mayor of Croydon's Business Plan. The objections have all been considered and in respect of 9 of the experimental schemes it is considered that the objections are not supported by the evidence gathered by the Council and detailed within this report and supporting appendices and/or are mitigated by the measures such as the permit scheme set out above.
- 6.2 The Healthy School Street Programme is a long-term goal aimed at changing travel behaviour from motorised transport to active travel which has significant health and wellbeing benefits. Adapting to a changing environment is a personal choice and this adaptation can also be influenced by society. Policy tools can be used to drive change forward and engendering a change in behaviour. If not progressed we will miss the opportunity to sow the necessary seeds of change which can realise the aspirations of

the council, i.e. specifically Outcome 4 of the Executive Mayor of Croydon Business Plan in the long term delivering a healthier and stronger community.

Option 2 Progressing HSS4 Keston Avenue

- 6.3 In respect of Keston Avenue, there was a significant number of objections all relating to traffic displacement indicating a huge dissatisfaction with the scheme under experimental traffic order.
- 6.4 The analysis of the objections detailed within the consultation section has indicated the following:
- Of the 100+ residences in Court Ave 53 objections were received from both emails and Get Involved survey
 - Keston School (HSS4) accounts for 39% of all objections received to the statutory consultation
 - Keston School (HSS4) accounts for 60% of all objections received in the Traffic Displacement theme or category

It is worth noting that the 2020 informal consultation process indicated 72% of those who responded (from outside of the scheme area, i.e. Court Avenue) were strongly opposed to the proposal to introduce a Healthy School Street in Keston Avenue. Included in the report is also a testimonial from Keston School, indicating the Head Teacher's concerns about the scheme.

- 6.5 Having regard to the historical outcome of the 2020 informal consultation, the current overwhelming level and nature of objections received from the statutory consultation and the evidence of displacement of traffic into Court Avenue as a result of implementation of the Experimental Order at this site as illustrated in Appendix B, it is recommended that this scheme and its associated experimental order should be withdrawn.

7 CONSULTATION

- 7.1 Schemes introduced under an ETO invite and must allow for objections to be made for a period of 6 months from the point they come into force. Objections are permitted from anyone affected by the scheme regardless of their status. The comments received during this objection period must be considered by the Council in determining whether any changes should be made to the experiment whilst it is in force and in considering whether to proceed to a permanent TMO following the experiment.
- 7.2 Key to the success of the Healthy School Street schemes under the current Experimental Traffic Orders is comprehensive consultation and engagement with the school community and public. The council is keen to seek the public's views when shaping highway improvement schemes, and the re-running of the ETOs supported this approach.
- 7.3 To ensure that the council has captured the views of the public carefully, the council agreed to implement HSS schemes under Experimental Traffic Management Orders (ETOs) from 25 April 2022 which included a 6-month objection period from the start of the ETO operational date. This provided an opportunity for residents who may be directly or indirectly affected to make representations to the council.

7.4 As part of the ETO process, statutory consultees were notified of the proposals. The School Streets schemes do not impact on access for any of the emergency services and the council has not received any objections from the emergency services for any of the School Street schemes that have been implemented to date.

7.5 To make the process of submitting a representation as convenient as possible, the council along with the traditional method of being able to write in, also enabled receipt of objections and comments through its 'Get Involved' web platform.

7.6 The council has an active internal communications and engagement team that made, announcements and publications in relation to the consultation via various means these have been detailed below.

- Your Croydon
- I Love Croydon Facebook page
- I Love Croydon Instagram page
- I Love Croydon Twitter Account
- The council has a dedicated Healthy School Streets website (where the consultation material was published along with background information on the councils Healthy School Street programme
- A dedicated Healthy School Streets email address was set up per scheme.

7.7 The summary of findings of the 6-month statutory consultation for all 10 experimental schemes is listed below.

- In total 5,635 letters were delivered across all 10 schemes within the agreed 250m consultation boundary. Additionally, legal notices were placed on lamp posts in the specific school street and in the vicinity of the school street as well as published in the local press as laid out in legislation. It is important to note that although the council chose to send letters within an agreed 250 metre boundary anyone affected by the scheme regardless of the boundary can submit objections during the 6-month statutory objection period.
- In total 145 responses were received across all 10 schemes; 116 responses were received from the Get Involved survey and 29 responses received from specific scheme email addresses which represents a very low response rate of 2.5%. The average response rate for highway consultations in Croydon is 10%. It is worth noting that a statutory process invites representations in the form of objections only and can only consider representations made.
- The response rate for an informal consultation process can generally be higher than that of a statutory consultation stage, this is because of the manner in which an informal consultation process is structured and the manner in which a scheme is presented to consultees. Whereas a statutory consultation is geared at seeking representations in the form of objections and not support. It is a legal process and carried out in line with current legislation.
- The table below represents the breakdown of responses received from two sources.

Source	Objections	Support
Get Involved surveys	112	4

HSS email addresses	24	5
Total	136	9

- The table below shows the breakdown of objections received from individual scheme areas from the two sources.

HSS	School	School Street	Total number of responses received	Total number of support received	Total number of objections received
1	Ecclesbourne Primary school CR7 7FA	Atlee St	13	0	13
2	St Thomas Becket Catholic Primary School SE25 5BN	Dickenson's Lane	5	0	5
3	Harris Primary Academy school CR2 6HS	Haling Rd	14	3	11
4	Keston Primary School CR5 1HP	Keston Ave	53	1	52
5	Downsview Primary School SE19 3XE	Marston Way	8	1	7
6	Christchurch CofE Primary School CR8 2BS	Montpelier Rd	14	1	13
7	Oasis Academy Ryelands SE254XG	Sandown Rd & Oakley Rd	12	3	9
8	Ridgeway Primary School CR2 0EQ	Southcote Rd	9	0	9
9	Harris Primary Academy Croydon CR03JT	Thomson Crescent and Chapman Rd	8	0	8
10	St Joseph's Catholic Junior School	Woodend	9	0	9
			145	9	136

- The reason for the low number of supportive responses is largely due to the manner in which the statutory process is set out in legislation, i.e. aimed at seeking any objections to the notice of proposal to make a traffic management order. In general, when a statutory process is evoked, the council does not expect to receive support. The council seeks level of support / opposition for any scheme through an informal consultation process which then decides whether to proceed to a statutory process or not. A few respondents have chosen to send their support to the statutory process. Hence the very low level of support in comparison to the informal consultation carried out in 2020 when the response rate was 17%
- HSS 4 Keston Avenue** received a high proportion of objections totalling 52 (37 objections lodged on the online Get Involved survey and 15 emails received) out of

145 representing 38.8% of all objections received across the 10 Healthy School Street schemes. Nearly all the objections received were from Court Avenue, which is a link from Keston Avenue to Coulsdon Road. The objections' theme was mainly traffic displacement related.

7.8 An analysis of responses received is outlined below. Objections received were categorised into 4 themes:

- 1) traffic displacement,
- 2) Access problems,
- 3) Money making scheme and
- 4) other (inadequate signage, restrictions too long, against in principle).

7.9 The analysis was conducted taking into account all objections received for consideration (emails and Get Involved survey).

7.10 Analysis of objections:

7.10.1 Traffic displacement: This accounts for 50% of all objections received. The objections received focused on traffic displacement to neighbouring roads as a direct result of the measures in place. Whilst it is accepted that the scheme has caused a degree of traffic displacement to neighbouring streets, in respect of the 9 schemes recommended to be made permanent, the displaced traffic is dissipated across a wider network of roads as parents find parking in the area. In general, during the experimental period some parents may decide to continue driving their children to school and use neighbouring streets. This behaviour may change when the schemes are made permanent as those parents who continue to use their cars may be influenced by those who walk to school and change their travel behaviour. The road safety aspect mentioned in some of the objections have been considered and in general when traffic is dissipated over a larger area there is a reduction in road danger as opposed to a concentration of traffic within a smaller section of road space near schools.

As a result of the outcome of the statutory consultation, objectors raised concerns in certain streets about vehicles using neighbouring streets which are left idling, parents parking on yellow lines and also blocking driveways. Due to limited resources within the Parking enforcement team, it would not be practicable to deploy enforcement officers at all locations near school streets to carry out monitoring of poor parking behaviour and enforce illegal parking. However, using knowledge of the network and the operational issues, supplemented with the feedback received from the consultation and other customer reports, the Council will develop a schedule of targeted parking enforcement for school streets and surrounding streets. In addition, the Highways and Parking team will work jointly with the Air Quality team on issues of idling vehicles through their campaigns.

7.10.2 Access issues during the hours of operation which accounts for 19% of all objections received.

The majority of objections under this category relate to:

- a) access for family and friends visiting,
- b) access for tradesperson/ builders carrying out repairs,
- c) having grocery deliveries,
- d) access for carers for their elderly parents or for the elderly in general,

e) organising taxis for hospital appointments, etc.

The council has in place a suite of permits and exemptions to provide access for various users. The Council has published information online which includes how the permit system works and eligibility for access during the operational hours. The information is very comprehensive and should assist residents in meeting some of their essential needs. The scheme also caters for family, carers, builders/ tradespersons visiting premises during the hours of operation through the issuance of temporary permits free of charge. There is also sufficient flexibility within the permit system for the council to consider special access requests on a case-by-case basis, for example for those with medical circumstances requiring carers during the hours of operation and/or being collected by taxis for hospital appointments. The delivery of groceries and other types of deliveries such as online shopping can be planned for outside of the operational hours. In general deliveries of parcels by Amazon and other couriers can be redirected to specific shops or shopping areas where lockers exist for such arrangements. The web site information detailing the permit system can be accessed [here](#).

7.10.3 **“This is a money-making scheme” accounting for 7% of all objections received:**

The council does not profit from traffic filter fines. Any revenue generated from any camera-controlled restrictions anywhere in the borough is re-invested into improving parking, highways and road safety in the borough. This is in line with current legislation governing income generation from enforcement of parking and traffic regulations.

7.10.4 **Other categories such as inadequate signage, restriction hours too long, against the idea of road closure and similar schemes in principle etc accounting for 28% of all objections received.**

The signage in place for the schemes are in line with the Traffic Sign Regulation and General Direction (TSRGD) and in general some signs are authorised by the Department for Transport if they are deemed to be outside of the current sign regulations. For the purpose of enforcement signs have to comply with current DfT regulations and special attention is given during the design stage to ensure signage compliance with DfT sign regulations.

Some objectors have suggested reducing the hours of operation of the school street to one hour during the morning and afternoon similar to some school street schemes in a few boroughs. The rationale for their suggestions was that the shorter hours would ease their perceived access problems. Some residents have stated that they avoided the school streets during the operational hours due to ANPR enforcement and use other neighbouring streets to access their properties. However, the permit system allows for resident access and their family and friends for up to 3 permits.

Whilst consideration has been given to having shorter operational hours, in light of the nature of the objections and officers' consideration of those objections as detailed within this report, officers consider that this is not warranted in the current circumstances and would potentially encourage parents to drive to the school street earlier and park in order to maintain their usual school run journeys. This possibility has been borne out by other London Boroughs with whom we have informally discussed the issue. This would defeat the key objective of reducing non-essential car borne trips for school run to create a quality space for school children and to encourage walking.

The table below provides a summary of the number of responses received in objection or support, with response rate for each scheme.

All 10 school Proposals			Opinions	
Distance	Letter	Responses	No	Yes
Get Involved Survey	5635	116	112	4
		2.1%	96.6%	3.4%
Emails/Letters		29	24	5
		0.5%	82.8%	17.2%
Total		145	136	9
			93.8%	6.2%

Ecclesbourne Primary School			Opinions	
Distance	Letter	Responses	No	Yes
Get Involved Survey	450	13	13	0
		2.9%	100.0%	0.0%
Emails/Letters		0	0	0
		0.0%	0.0%	0.0%
Total		13	13	0
		2.9%	100.0%	0.0%

St Thomas Beckett Catholic Primary			Opinions	
Distance	Letter	Responses	No	Yes
Get Involved Survey	509	4	4	0
		0.8%	100.0%	0.0%
Emails/Letters		1	1	0
		0.2%	100.0%	0.0%
Total		5	5	0
		1.0%	100.0%	0.0%

Harris Primary Academy Haling Park			Opinions	
Distance	Letter	Responses	No	Yes
Get Involved Survey	719	12	11	1
		1.7%	91.7%	8.3%
Emails/Letters		2	0	2
		0.3%	0.0%	100.0%
Total		14	11	3
		1.9%	78.6%	21.4%

Keston Primary			Opinions	
Distance	Letter	Responses	No	Yes
Get Involved Survey	500	38	37	1
		7.6%	97.4%	2.6%
Emails/Letters		15	15	0
		3.0%	100.0%	0.0%
Total		53	52	1
		10.6%	98.1%	1.9%

Downsview Primary School			Opinions	
Distance	Letter	Responses	No	Yes
Get Involved Survey	305	7	6	1
		2.3%	85.7%	14.3%
Emails/Letters		1	1	0
		0.3%	100.0%	0.0%
Total		8	7	1
		2.6%	87.5%	12.5%

Christ Church CoE Primary School			Opinions	
Distance	Letter	Responses	No	Yes
Get Involved Survey	528	11	10	1
		2.1%	90.9%	9.1%
Emails/Letters		3	3	0
		0.6%	100.0%	0.0%
Total		14	13	1
		2.7%	92.9%	7.1%

Oasis Academy Ryelands			Opinions	
Distance	Letter	Responses	No	Yes
Get Involved Survey	1295	7	7	0
		0.5%	100.0%	0.0%
Emails/Letters		5	2	3
		0.4%	40.0%	60.0%
Total		12	9	3
		0.9%	75.0%	25.0%

Ridgeway Primary School			Opinions	
Distance	Letter	Responses	No	Yes
Get Involved Survey	209	8	8	0
		3.8%	100.0%	0.0%
Emails/Letters		1	1	0
		0.5%	100.0%	0.0%
Total		9	9	0
		4.3%	100.0%	0.0%

Harris Primary Academy Croydon			Opinions	
Distance	Letter	Responses	No	Yes
Get Involved Survey	927	8	8	0
		0.9%	100.0%	0.0%
Emails/Letters		0	0	0
		0.0%	0.0%	0.0%
Total		8	8	0
		0.9%	100.0%	0.0%

St Joseph's Catholic Junior School			Opinions	
Distance	Letter	Responses	No	Yes
Get Involved Survey	193	8	8	0
		4.1%	100.0%	0.0%
Emails/Letters		1	1	0
		0.5%	100.0%	0.0%
Total		9	9	0
		4.7%	100.0%	0.0%

7.11 School Responses

Integral to the statutory consultation we received responses from 4 schools within the batch of 10. Whilst 4 schools provided comments as to whether they felt the experimental schemes were of benefit or not, other schools did not respond.

Response 1: HSS 1 – Ecclesbourne Primary School, Attlee Close – *“This scheme has been very positive for pupils, parents and staff at the school and we wholeheartedly endorse the scheme being continued permanently. We now have more children walking to school as the road is safer to cross. Parents are no longer reluctant to walk to school as they know that there won't be lots of cars jammed in Atlee Close with aggressive or dangerous driving. The number of staff cycling to work has also increased which may be because of reduced traffic flowing into the area.”* Head of School.

Response 2: HSS8 - Ridgeway Primary School – *“The Healthy Street Scheme has enabled a safer and cleaner environment around the immediate area of our school. Children and families are safer as our school opens onto a road which previously would have been busy with the congestion of parents/carers collecting and dropping off. Parents are no longer able to pull over in the middle of the road outside of school to drop off (while watching their child enter school) which is also much safer for all. Due to the reduction of vehicles moving along this road during drop off and collecting times parents and children have more space to spread out enabling staff a clearer visibility of parents and carers during collecting times and parents/carers clearer visibility of their children.”* Co-Headteacher

Response 3: HSS 9 – Harris Primary Academy Haling Park – *“The school street at Harris Primary Academy Haling Park has had a huge impact on the safety of our community. Since the school street was reinstated following a short suspension last academic year we have seen:*

Huge decrease in traffic on Haling Road at pick up and drop off times, Decrease in the amount of vehicles using Haling Road as an access route (often at high speed) between Brighton Road and Selsdon Road; Less pollution outside the school due to idling vehicles.

The School street is a necessary safety measure to keep the children and families at HPAHP safe. During the time it was suspended last year we were in great danger of seeing a child knocked over.

The School Street has had an impact on neighbouring roads due to parking. Requests have been made to the council to support the school with managing this. We have been told that this is not possible, via parking enforcement, as there are higher needs in the borough. I think it would be worth making the bottom end of Haling Road a one way loop to reduce this problem.” Head of Academy

Response 4: HSS 4 – Keston Primary School Keston Avenue – *“I can say that mostly, the street scheme works well, in terms of the traffic directly outside school is better. However, in the surrounding area, traffic flow is terrible. The scheme has shifted the problem so to speak. Our parents are aware of the scheme, however, those who are unaware, (delivery drivers/visitors etc) are incurring fines despite the signage. The signage turning off of the Coulsdon Road into Keston Ave, once seen, is too late to turn back as it is right on top of the turning.”* Keston Primary School

8 **Technical Assessments: Do the experimental orders support the objectives which led to their introduction:**

8.1 **Road Safety:**

- 8.1.1 Appendix B sets out the traffic volume data for the respective school streets.
- 8.1.2 Traffic data was collected between 20-24 February 2023 on neighbouring roads using Vivacity AI Smart Sensors to assess the extent of diverted traffic as a direct result of the restricted times where school streets exist. We do not have any smart traffic sensors in the vicinity of Downsview Primary School and St Joseph Catholic Junior School and therefore were not able to collect data. However, we were able to collect traffic data using Automatic Traffic Counters.
- 8.1.3 An analysis of this data has been carried out to show changes in traffic volume within the school streets under the various experimental orders. The analysis shows a reduction in traffic volume in specific school streets which are the subject of this report. This reduction can be attributed to a combination of
- 1) a change in travel behaviour and
 - 2) a transfer of traffic to neighbouring roads.
- 8.1.4 The table below shows the percentage decrease/ increase in traffic volume in Healthy School Streets when compared with pre-restricted hours and restricted hours during the morning and restricted hours and post restricted hours during the afternoon. The % reduction / volume reduction is for specific roads and is bi-directional. The reduction in traffic in the 9 specific school streets which are recommended to be made permanent meets the road safety objective of the Statement of Reasons in the ETO. A reduction in traffic volume reduces the risk of road danger and creates a quality space for school children.

Traffic Analysis in Healthy School Streets							
HSS Ref	Schools	Healthy School street	Road Safety		% Traffic Reduction (-ve)/ Increase PM (+ve) bi-directional per hour	Represent a reduction of xx vehicles during morning from two directions	Comments
			% Traffic Reduction (-ve)/ Increase AM (+ve) bi-directional per hour	Represent a reduction of xx vehicles during afternoon from two directions			
HSS1	Ecclesbourne Primary school	Atlee Close	-27%	-13	-26%	-11	Very low volume in two directions
HSS2	St Thomas Becket Catholic Primary School	Dickenson's Lane	-19%	-3	-31%	-5	Very low volume in two directions
HSS3	Harris Primary Academy Haling Park	Haling Road(one way eastbound)	-82%	-63	-84%	-111	Historically a rat run which is significantly reduced outside
HSS4	Keston Primary School	Keston Ave	-87%	-79	-86%	-71	low volume in traffic terms in two
		Court Ave	71%	49	2%	2	Increase in traffic volume in Court Avenue is considered significant during the AM peak as this road forms a link between Keston Avenue and Coulsdon Road.
HSS5	Downsview Primary School	Marston Way	-30%	-8	-37%	-10	Very low volume in two directions
		Biggin Way	-71%	-84	-63%	-40	low volume in traffic terms in two
HSS6	Christ Church CofE Primary School	Montpelier Rd	-68%	-56	-47%	-23	Very low volume in two directions
HSS7	Oasis Academy Ryelands	Sandown Rd (one way eastbound)	-59%	-17	-74%	-42	Very low volume in two directions
		Oakley Rd	-33%	-6	-57%	-17	Very low volume in two directions
HSS8	Ridgeway Primary School	Southcote Rd	-71%	-25	-78%	-31	Very low volume in two directions
HSS9	Harris Primary Academy Croydon	Thomson Crescent	-69%	-27	-77%	-34	Very low volume in two directions
		Chapman Rd	-54%	-13	-27%	-4	Very low volume in two directions
HSS10	St Joseph's Catholic Junior School	Woodend(one way north bound)	-6%	-1	-58%	-18	Very low volume in two directions

8.1.4 It is recognised that there will be an element of displacement within the vicinity of the schools in the short term until travel behaviour changes over time. The data in respect of the 9 experimental orders recommended to be made permanent does not demonstrate that the displacement across the area around the school streets to be significant in traffic terms. The data is assessed from the graphs shown in Appendix B of the report and focuses on the worst-case scenario during the morning and afternoon, i.e. at 0830am and 3.00pm. It is envisaged that the current displacement in the 9 school streets recommended to be made permanent, will reduce over time as more parents embrace a changed travel behaviour to more sustainable modes, i.e. walking, cycling and using public transport.

8.15 The majority of objections were received from the Keston Primary School scheme (HSS4) where traffic displacement in Court Avenue was the key issue raised. The Council carried out traffic counts using tubes across the road (Automatic Traffic Count) to measure two-way traffic movements in Court Avenue. These were installed between 22 and 28 May 2023 and collected data continuously 24 hours per day over this 7-day period. In analysing this data, we look at the 5-day average over a 12-hr period (Monday-Friday 7am -7pm).

The analysis identified the following:

HSS	Court Avenue Traffic data 0700-0800am 2 ways	Court Avenue During Restricted times 0800-930am 2 ways	Court Avenue During restricted times 0200-0400pm 2 ways	Court Avenue After restricted times 0400-0500pm 2 ways
Keston Primary School	69 (35 one way)	118 (59 one way)	93 (46 one way)	91 (45 one way)

8.1.5 The traffic analysis shows an increase in traffic in Court Avenue when a comparison is made between the volume of traffic from 0700am to 0800am and from 0800am - 0930am. Court Avenue is approximately 380 metres in length in comparison to the Keston Avenue School Street which is 140 metres. Court Avenue has historically been a route used by drivers as it links Keston Avenue to Coulsdon Road. The Automatic Traffic Counter used only takes into account vehicles passing over a set of rubber tubes in both directions. The survey is not able to identify drivers passing and parking. So, the data captured is the total volume of traffic passing a specific point where the tubes were placed. This traffic flow is a combination of:

- 1) drivers habitually using Court Avenue to head to its junction with Coulsdon Road and
- 2) parents driving to Court Avenue to park. There are numerous crossovers in Court Avenue and no parking restrictions resulting in availability of road space for parking.

8.1.6 Some respondents are opposed to changes made for the experimental school streets, as there is a perception that the council has improved conditions outside schools, only to create another problem in the surrounding streets, i.e. traffic displacement. It is important to note that the council has a long-term goal across the borough to change travel behaviour to more sustainable modes through various programmes, including Healthy School Streets

8.1.7 Road safety can be quantified through the analysis of collision data before and after, in general we have to wait for a 3-year period for any scheme to look at the collision statistics as a result of any improvements to quantify any safety benefits via this means. In the case of school streets, we can only rely on changes to traffic data over the course of the experimental period to assess the benefits of the scheme in place. The benefits being reducing the risk of exposure to traffic and hence decreasing the risk of injury collisions.

8.2 Air Quality:

- 8.2.1 Appendix C sets out the data gathered in respect of air quality impacts.
- 8.2.2 Air quality monitoring equipment has been installed at all school street locations, and whilst it is too early to comment fully on pollution levels indicated by recent Breathe London monitoring data collected during the last week of July 2023 (refer to Appendix C), an initial review shows that levels are as would be expected at the 15 monitoring sites, with data seeming to be reliable and accurate.
- 8.2.3 In accordance with expert consultants working on behalf of the council, air quality needs to be monitored over a longer timeframe than the length of an experimental order and is an area wide measurement not necessarily a specific street measurement given that there are weather factors which have to be taken into consideration. What we have been able to deduce from the measurements taken, is that the air quality is in accordance with the mean objectives set within the UK legal limits. As such we are not able to make any comparison with before data unless we can look at historical data across London.
- 8.2.4 Under the Environment Act 2021 the government has set a target to reduce Particulate Matter (PM2.5) to an annual mean concentration target for PM2.5 of 10 µg/m³ across England by 2040. Recorded pollution levels in the school street monitoring locations are initially indicated to be well within this UK objective for Particulate Matter (PM2.5). Given the complexities of air quality monitoring, further monitoring over a longer period (ideally 12 months) will be undertaken before any conclusive and extensive opinion can be given. However, given the increase in traffic volumes in Court Avenue which are not dissipated across the network in the same way as for the other 9 school street schemes, there is potential for there to be a detrimental impact on air quality, and this further supports the removal of the school street scheme for Keston School.

8.3 Encouraging people to walk more:

- 8.3.1 The Napier University website <https://www.napier.ac.uk/about-us/news/school-street-closures> contains a link to the published report from where the report can be downloaded. It found an uptake of more sustainable means of travel to and from schools located in 'School Streets' thereby reducing the overall number of car journeys. Croydon formed one of the administrative study areas featured in the report. The latest available data shows that the school streets schemes installed so far have resulted in 15% to 25% reduction car use and 23% to 65% increase in active travel.
- 8.3.2 The council has not carried out any research during the duration of the experimental period due to limited resources. That said, in general where the street space is relieved of high traffic volumes and congested state, there is a noticeable change in the look and feel of the road space. This in itself is a prompt to change travel behaviour and encourage parents to walk and cycle their children to school, additionally as more parents switch to sustainable modes, increasingly it creates a chain reaction. This is also influenced by the school through various travel behaviour and road safety initiatives working collaboratively with the council. There is also an opportunity for longer term research working collaboratively with the school communities to assess any degrees of success in terms of modal switch.
- 8.3.3 The council will work with other boroughs who have introduced school streets within a well-established programme to look at benchmarking and best practice, including how they

undertake monitoring post any decision making to make school streets permanent. This will help to inform research into and future analysis of behavioural change, shifting from car borne journeys to active travel modes and the timeline over which any change in travel behaviour has occurred. This will allow us to be more informative when we engage with our communities where we propose healthy school streets in future. It will also allow the council to engage in a clear and informed manner with the community on matters relating to schemes where behavioural change in modal shift is a key part of the aim and objective.

9. CONTRIBUTION TO COUNCIL PRIORITIES

- 9.1 Healthy School Streets form an integral part of a programme within the Local Implementation Plan which delivers Outcome 4 of the Executive Mayor's business plan, i.e. ***"Croydon is cleaner, safer and healthier, a borough we can call home"***.
- 9.2 Healthy School Streets are aimed at promoting and encouraging a change in travel behaviour be it over time. Promoting active travel is key to unlock the potential to switch to sustainable travel modes in view of the on-going climatic challenges we all face. This policy tool is geared at instilling a change in travel behaviour of parents taking their children to school, equally and importantly raising awareness amongst children about the benefits of active travel on health and well-being.

10 IMPLICATIONS

10.1.1 Revenue and Capital consequences of report recommendations

The making of 9 permanent Traffic Management Orders (TMOs) including officer time is expected to cost approximately £10,000.

The capital budget for the ETMO equipment and works is currently sitting within the Capital Parking budget (CAP39) where currently £1.833m of budget was approved as part of the March 2023 Council Budget Report.

If motorised vehicles, without exemption permits, were to enter the pedestrian and cycle zone they would be contravening the motorised vehicle restriction and would be subject to Penalty Charge Notice (PCN). The surplus income generated from PCNs is ringfenced for transport initiatives and the Freedom Pass.

The delivery of the 9 schemes recommended to be taken forward is consistent with the budget approved by the council for 2023/24 financial year.

10.1.2 The effect of the decision

The making of the TMOs will incur expenditure as set out above, with budget available from the existing operational capital budgets for Parking (CAP39).

10.1.3 Risks

Revenue from parking charges (including ANPR enforcement) is a key source of income for the council. If the outcome of this report was to not proceed with the recommendation, this would result in a reduction of the projected income from 2023/24 onwards. Also, it is recognised that School Street compliance will change over time, and revenue is

continually reducing. However, the schemes remain self-financing and bring important value through their road safety and air quality objectives.

If these Healthy School Streets are not made permanent the council will be obliged to pay back Transport for London the sum of money allocated and spent for their development and implementation under experimental powers. Given the current financial situation and ongoing financial constraints it would be in the council's interest to approve these schemes being made permanent.

10.1.4 Options

Substituting the proposed 9 School Street schemes with an elevated physical enforcement presence by Civil Enforcement Officers and using the CCTV smart car to enforce the school zigzags would be more resource demanding and less effective – i.e. is financially less efficient.

Approved by: Allister Bannin, Director of Finance (Deputy S151 Officer), 15/9/23

10.2 LEGAL IMPLICATIONS

10.2.1 The Road Traffic Regulation Act 1984 (RTRA) and the Local Authorities' Traffic (Procedure) (England and Wales) Regulations 1996 (LATOPR 1996) establish the procedures for making a traffic regulation order, (including an Experimental Traffic Regulation Order). The procedural provisions for Experimental Traffic Regulation Orders are set out in Part 1 sections 9-13A of the RTRA and Regulations 22 and 23 and Schedule 5 to the LATOPR 1996. Once an experimental order is in force, any person may object to it becoming permanent within the period of 6 months from the date an experimental order comes into force. If the experimental order is amended, objections may be made within 6 months of that amendment coming into force. The statutory consultation responses received and set out in this report include the objections received pursuant to these provisions, to which the Council must have due regard in making its decisions.

10.2.2 In determining whether or not to make a traffic management order, the Council is required, under Regulation 9 of the LATOPR to consider whether it is under a duty under regulation 9(3) to hold a public inquiry before making an order. Even where an inquiry is not mandated, the Council may still choose to hold an inquiry to consider objections before making any other order. The report details officers' consideration of these elements.

10.2.3 Regulation 23 which governs making an experimental order permanent provides that the Council is able to rely on the truncated process for approval of an experimental order being made permanent provided that the requirements of Regulation 23(3) are met and the sole effect of an order ("a permanent order"), is to reproduce and continue in force indefinitely the provisions of an experimental order or of more than one such order ("a relevant experimental order"), whether or not that order has been varied or suspended under section 10(2) of the RTRA.

10.2.4 Regulations 6 (consultation), 7 (notice of proposals) and 8 (objections) of the LATOPR 1996 shall not apply to a permanent order where the requirements specified in regulation 23 (3) have been complied with in relation to each relevant experimental order.

10.2.5 The regulation 23(3) requirements are that—

- (a) the notice of making contained the statements specified in Schedule 5;
- (b) deposited documents (including the documents referred to in sub-paragraphs (c) and (e)) were kept available for inspection in accordance with Schedule 2 throughout the whole of the period specified in regulation 22(4);
- (c) the deposited documents included a statement of the order making authority's reasons for making the experimental order;
- (d) no variation or modification of the experimental order was made more than 12 months after the order was made; and
- (e) where the experimental order has been modified in accordance with section 10(2) of the 1984 Act, a statement of the effect of each such modification has been included with the deposited documents.

10.2.6 In applying regulations 10, 11 and 13 and Schedule 3 of LATOPR 1996 to a permanent order to which regulations 6, 7 and 8 do not apply by virtue of regulation 23 (2)—

(a) the notices of making published in respect of each relevant experimental order shall be treated as the notice of proposals published under regulation 7(1)(a) in respect of the permanent order;

(b) any objection made in accordance with the statement included by virtue of paragraph (3)(a) in the notice of making published in respect of a relevant experimental order shall be treated as an objection duly made under regulation 8 to the permanent order.

10.2.7 By virtue of section 122 of the Road Traffic Regulation Act 1984 (RTRA), the Council must exercise its powers under the RTRA (including making experimental traffic orders under Section 9) so as to secure the expeditious, convenient and safe movement of vehicular and other traffic including pedestrians, and the provision of suitable and adequate parking facilities on and off the highway having regard to:

- The desirability of securing and maintaining reasonable access to premises;
- The effect on the amenities of any locality affected and the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads run;
- The national air quality strategy;
- The importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and
- Any other matters appearing to the local authority to be relevant.

10.2.8 High Court authority confirms that the Council must have proper regard to the matters set out at s122(1) and (2) RTRA and specifically document its analysis of all relevant section 122 RTRA considerations when reaching any decision.

10.2.9 The Greater London Authority Act 1999 places a duty on each London local authority to have regard to the Mayor of London's Transport Strategy when exercising any function. This therefore includes the exercise of its Traffic Management Duty (pursuant to s16 of the Traffic Management Act 2004) and when deciding whether to make a traffic order.

10.2.10 Where ANPR is used, the Council must ensure it adheres to the Investigatory Powers Commissioner's Office Guidance (previously Office of the Surveillance Commissioner)

and Information Commissioner Guidance, where appropriate. Officers will need to ensure that data protection matters, including the use of ANPR are addressed via the necessary data protection impact assessments.

Comments approved by Sandra Herbert Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer. (Date 13/09/23)

10.3 EQUALITIES IMPLICATIONS

10.3.1 The Equality Act 2010 introduced the Public Sector Equality Duty. This requires all public bodies, including local authorities, to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

10.3.2 An Equalities Impact Assessment (EqIA) has been completed for the introduction of the ETOs for the School Streets, and is included in Appendix D.

10.3.3 The School Streets operational concept is unchanged since they were first introduced 2017. This project is intended to restrict access for motor traffic except resident permit holders, cyclists, emergency services and certain other groups such as carers and those with disabilities. The impact will benefit the more vulnerable – such as pregnant mothers, children, those with debilitating respiratory illnesses with secondary health benefits for the wider communities.

10.3.4 Feedback from the representations received as part of the statutory objection periods on the previous and ongoing ETOs has not raised any new or emerging equalities issues. The implementing team has considerable practical experience of operating School Streets since 2017.

10.3.5 The EQIA has identified some negative impact in regards to Age, Disability, Pregnancy and Maternity however, the team has in place mitigation to address these including making provision for schools to request temporary access if necessary.

10.3.6 Comments approved by Denise McCausland Equalities Programme Manager (15/08/2023).

11. APPENDICES

Appendix A: Consultation methodology and analysis

Appendix B: Traffic data analyses

Appendix C: Air Quality data analysis

Appendix D: Equality Impact Assessment

Appendix E: DPIA

12. BACKGROUND DOCUMENTS

None.

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APPENDIX A – CONSULTATION ANALYSIS

This appendix sets out in detail the following items:

- Describes the Experimental Traffic Management Order (ETMO) process
- Consultation methodology
- Consultation publicity
- Analysis of the responses received per scheme

ETMO 6 month statutory objection period:

The purpose of the ETMO objection period was to seek the views of the relevant partners on the proposed schemes under ETMOs. The consultation method is explained in further detail below:

Internal consultation – officers will share the proposals and seek feedback from the following before the consultation is made public:

- The Cabinet Member for Streets & Environment
- Local Ward councillors
- Director of Education
- Highways and Parking Service Teams
- Transport Strategy Service
- Communications & Engagement Team
- Head Teachers of affected schools

External consultation – amendments following feedback at the internal stage will be made and the final public consultation leaflets will be published and shared with the following:

- Local Member's of Parliament
- The Cabinet Member for Streets & Environment
- Local Ward councillors
- Director of Education
- Highways and Parking Service Teams
- Transport Strategy Service
- Communications & Engagement Team
- External partners such as Transport for London, Trams & Buses
- All affected school, the staff and parents
- All affected residents and businesses located within 250m of the school street
- Local groups and associations located within 250m of the school street
- Places of worship located within 250m of the school street
- Emergency Services
- On all council digital platforms
- Through council press release and newsletter

Consultation method:

The council delivered a consultation leaflet per HSS explaining the schemes in detail to all residents, businesses and organisations located within 250 metres from the extents of the proposed school street. The consultation leaflets sent out for all 10 proposed Healthy School Street schemes have been included with this report.

250 metre consultation boundary:

To fully understand and appreciate the consultation analysis as presented in this report, it is important to note the consultation boundary, its definition and categorisation.

- 250 metre boundary: the council has chosen to consult properties that fall within 250 metres of the extents of the proposed healthy school street scheme by sending them a consultation leaflet. This is consistent with the method use previously when consulting on the existing school streets.
- The distance of 250 metres is measured as road length from the various entry points to any one scheme.

Get Involved Survey

The leaflets published the link to the Get Involved Survey [Healthy School Streets Experimental Traffic Management Orders \(ETMOs\) - Statutory Consultations | Get Involved Croydon](#) that encouraged the community to use this channel to submit their objection or support for the proposals. We also accepted emails to a dedicated email address (as set out below) and letters.

Consultation publicity:

The consultation launched on 25 April 2022 and expired at midnight on 25 October 2022. It was published on all digital platforms in tandem with announcements made about the consultation through a council press release and newsletter. The response rate is based on the number of leaflets delivered to those within the consultation area (250 metre boundary) and responses received from the same only. In total 5,635 leaflets were delivered, and 145 responses were received from those within the consultation area, representing a response rate of 2.5%, the average response rate from consultations in Croydon is around 10%. In line with good practice the council installed street notices in the vicinity of the school.

The council has an active internal communications and engagement team that made announcements and publications in relation to the consultation via various means these have been detailed below with links to the relevant publications:

- 1) Your Croydon: [Have your say on proposals for new Healthy School Street schemes – Newsroom \(lbc-app-w-newscroydon-p.azurewebsites.net\)](#)
- 2) I Love Croydon Facebook page
- 3) I Love Croydon Instagram page
- 4) I Love Croydon Twitter Account:
- 5) The council has a dedicated Healthy School Streets website (www.croydon.gov.uk/school-streets), where the consultation material was

published along with background information on the councils Healthy School Street programme

- 6) A dedicated Healthy School Streets email was set-up for enquiries only relating to the consultations – healthyschoolstreets@croydon.gov.uk

All the objections received during that 6-month statutory period are considered along with the council's own assessment on how the scheme has performed before taking a decision to either remove the scheme in its entirety or make the scheme permanent after the 18 month period. The reasons for implementing schemes under ETMO's are as follows:

- Enables an extended consultation period (6 months)
- Enables those affected to appreciate the true impact of the schemes and submit objections in real time.
- Enables the council to monitor the schemes and its impacts on air pollution and traffic.
- Enables the council to make amendments to the schemes in response to objections received during the first 6 months of the 18-month ETMO period.
- Enables decision makers to review experimental feedback and data before a decision is made to retain or remove schemes.

Analysis of the responses received per scheme

Analysis of objections received from Get Involved link							Objections received per theme					Themes and Summary of objections	Officer Response		
HSS	School	School Street	Total No of responses received (getinvolved) per scheme	Total No of responses received (emails) per scheme	Overall total of responses received	Overall Total number of support received per scheme (emails + getinvolved)	Overall Total number of objections received per scheme (emails + getinvolved)	Traffic Displacement	Access during restricted times	Money Making scheme	Other (inadequate signage, restrictions too long, against in principle etc)			Total (check)	
1	Ecclesbourne Primary school CR7 7FA	Atlee St	13	0	13	0	13	3.33	5.33	2.33		2	12.99	Traffic Displacement: The scheme has contributed to an increase in congestion in nearby roads. Access times causing difficulty for deliveries in particular the afternoon 2-4pm restrictions, reliance on deliveries for medical supplies for disabled children. Food deliveries additionally is an issue during restricted times. Use of taxis for shopping trips is limited to outside of restrictions and this is an issue, additionally use of taxis for hospital appointments has become a problem. Caring for disabled children is a problem with current restrictions. Money making: scheme introduced to raise revenue. Other: roads should not be closed	The council has an FAQ's on line providing information on how the permit system work and eligibility for permits. .https://www.getinvolved.croydon.gov.uk/schoolstreetsg4/widgets/64673/faqs#17416 . However, insofar as shopping trips by taxis and grocery deliveries are concerned, these can be planned to take place outside of the restricted hours of operation as these options exist. The revenue raised through enforcement is ringfenced to be spent on maintaining the public highway in line with current legislation. The programme of school streets are introduced in line with current national and regional and local policies aimed at increasing walking and cycling for health benefits
2	St Thomas Becket Catholic Primary	Dickenson's Lane	4	1	5	0	5	1	1.5	0.5		2	5	Access times causing difficulty for visitors, people with medical conditions need support throughout the day i.e carers	as above
3	Harris Primary Academy school CR2 6HS	Haling Rd	12	2	14	3	11	3.33	1.5	1.83		4.33	10.99	Traffic displacement in Helder Rd. Road Safety Parents park illegally on single yellow lines on Haling Rd section just off Brighton Rd causing congestion Money making scheme: Council wants to raise revenue.	Any monies raised through enforcement are ringfenced for expenditure on the public highway. In-person enforcement can be increased to tackle illegal parking at specific locations. The revenue raised through enforcement is ringfenced for re-investment in maintaining the public highway in line with current legislation
4	Keston Primary School CR5 1HP	Keston Ave	38	15	53	1	52	39.88	2.5	0.6		9	51.98	Traffic displacement : Court Ave is now congested due to rat running traffic and displaced traffic due to the restrictions in Keston Ave. Drivers get into a habit of using Court Ave even outside of the restrictions even at weekends, driveways currently blocked by parents. Speeding issues in Court Ave, restrictions causing problems for visitors and parents arrive earlier in Keston Ave before restrictions in place. Other category.	To assess the concerns raised with respect to displaced traffic in Court Avenue, the council undertook traffic surveys. Keston Primary has a secondary school entrance on Court Avenue, where we have seen recorded traffic volumes increase in the AM Peak period. Whilst in other locations school and local traffic could dissipate across the wider local area, for Court Avenue the surrounding road network is such that it forms an alternative route between Coulsdon Road and Keston Avenue, meaning that traffic displaced from the restricted section of Keston Avenue is concentrated in Court Avenue, thereby increasing road danger risk.
5	Downsview Primary School SE19 3XE	Marston Way	7	1	8	1	7	1.5	2.5	1		2	7	Traffic displacement on Biggin Hill and congestion. Access issues: Difficulty for elderly and disabled requiring taxis during hours of operation, deliveries of parcels and groceries affected. Scheme to change travel behaviour does not consider the elderly and disabled. Money making scheme. Other category	The council has an FAQ's on line providing information on how the permit system work and eligibility for permits. .https://www.getinvolved.croydon.gov.uk/schoolstreetsg4/widgets/64673/faqs#17416 . However, insofar as shopping trips by taxis and grocery deliveries are concerned, these can be planned to take place outside of the restricted hours of operation as these options exist. The revenue raised through enforcement is ringfenced to be spent on maintaining the public highway in line with current legislation. The programme of school streets are introduced in line with current national and regional and local policies aimed at increasing walking and cycling for health benefits
6	Christchurch CofE Primary School CR8 2BS	Montpelier Rd	11	3	14	1	13	5	5	0		3	13	Traffic Displacement. Access issues: access for visitors / deliveries. Difficulty for those requiring taxis for hospital appointments, needing carers, requiring contractors / builders for repairs, family and friends cannot visit during operational times. If scheme is to stay then change times to one hour 0800-0900 and 3-4pm, enforcing during term times only	As above, the council has made arrangements through the current permit system for builders/ other tradesperson to attend premises. See FAQ's on consultation website .https://www.getinvolved.croydon.gov.uk/schoolstreetsg4/widgets/64673/faqs#17416 . The current permit system allows for temporary permitting of tradesperson / builders for attending premises for repairs. Family and friends can be exempt from the scheme up to a limit of 3 permits free of charge. The longer hours of operation is a deterrent to parents who may drive to school earlier if the restricted hours were shorter and defeat the main goal of the scheme.
7	Oasis Academy Ryelands SE254XG	Sandown Rd & Oakley Rd	7	5	12	3	9	5.33	0.33	3.33		8.99	Traffic displacement issues. Access issues: tradesperson, family and friends cannot visit during operational times, signage inadequate or unclear to drivers, operational times to be limited to one hour AM and PM	Please see response ref Access and displacement issues. Signage in line with current regulations	
8	Ridgeway Primary	Southcote Rd	8	1	9	0	9	4	1	0		4	9	Access issues: tradesperson, family and friends cannot visit during operational times	Please see response ref Access and displacement issues.
9	Harris Primary Academy	Thomson Crescent and	8	0	8	0	8	1	5	0		2	8	Access issues: Difficulty for elderly and disabled requiring taxis during hours of operation, deliveries of parcels affected.	Please see response ref Access and displacement issues.
10	St Joseph's Catholic Junior School	Woodend	8	1	9	0	9	3	1	1		4	9	Traffic Displacement: parents parks along Bradley Rd causing congestion, park along driveways and on yellow lines. Access issues: No access to Woodend during operational times of schemes means longer detour to get to Beulah Hill.	The council can look at increasing enforcement patrols at troubled spots where illegal parking takes place. Access to Woodend can be planned outside of the operational hours.
Total			116	29	145	9	136	67.37	25.66	10.59		32.33	135.95		

Appendix B

Traffic data from School Streets restricted zones

Table of Automatic Traffic Counts for school streets operating times 0800-930am and 2pm -4pm															
Date of Counts: 22 May -26 May 2023 over a 5 week day period															
HSS Ref	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	Schools	Healthy School street	Ward	Morning Peak 07-8am counts over 5 days in 2 directions	5 day Ave 7-8am in two directions	HSS Operating times 0800-0930am Count in 2 directions over 5 days	HSS Operating times 08-930am 5 Day Ave in 2 directions	HSS Hourly Ave (AM) counts in 2 directions	HSS Operating times 2-4pm Count in 2 directions over 5 days	HSS Operating times 5 Day Ave in 2 directions	HSS Hourly Ave(PM) counts in 2 directions	Afternoon Peak 4-5pm in two directions (outside of restrictions)	Afternoon Peak 4-5pm 5 Day Ave in two directions	Additional notes	Road Type (heirarchy)
HSS1	Ecclesbourne Primary school	Atlee Close	Bensham Manor	246	49	269	54	36	307	61	31	208	42		residential Cul-de-sac
HSS2	St Thomas Becket Catholic Primary School	Dickenson's Lane	Woodside	78	16	96	19	13	110	22	11	80	16		residential Cul-de-sac
HSS3	Harris Primary Academy Haling Park	Haling Road(one way eastbound)	South Croydon	385	77	104	21	14	213	43	21	661	132	One direction only	link between Brighton Rd (A road) and Selsdon Rd (B) road
HSS4	Keston Primary School	Keston Ave	Old Coulsdon	453	91	88	18	12	121	24	12	416	83		Off Coulsdon Rd serving catchment area
		Court Ave	Old Coulsdon	346	69	886	177	118	929	186	93	457	91		residential access road links Keston Rd to Coulsdon Rd
HSS5	Downsview Primary School	Marston Way	Norbury Park	100	20	105	21	14	167	33	17	137	27		residential rd cul-de sac
		Biggin Way	Norbury Park	594	119	262	52	35	225	45	23	315	63		residential access rd
HSS6	Christ Church CofE Primary School	Montpelier Rd	Purley Oaks & Riddlesdown	408	82	198	40	26	261	52	26	244	49		Residential Rd partly parallel to Brighton Rd
HSS7	Oasis Academy Ryelands	Sandown Rd (one way eastbound)	Woodside	146	29	91	18	12	154	31	15	283	57	One direction only eastbound	residential rd links between Portland Rd and albert Rd
		Oakley Rd	Woodside	89	18	91	18	12	125	25	13	148	30	one direction westbound	residential access road links Keston Rd to Coulsdon Rd
HSS8	Ridgeway Primary School	Southcote Rd	Sanderstead	177	35	73	15	10	85	17	9	198	40		residential road
HSS9	Harris Primary Academy Croydon	Thomson Crescent	Broad Green	194	39	92	18	12	104	21	10	221	44		residential road
		Chapman Rd	Broad Green	119	24	80	16	11	105	21	11	77	15		residential access rd
HSS10	St Joseph's Catholic Junior School	Woodend(one way north bound)	Crystal Palace & Upper Norwood	80	16	113	23	15	128	26	13	157	31	one way direction only	links A214 to Bradley Rd
Notes: All roads analysed															
Compare columns 5 (outside restriction) and 8 (within restriction)															
Compare columns 11 (within restriction) and 13 (outside restriction)															

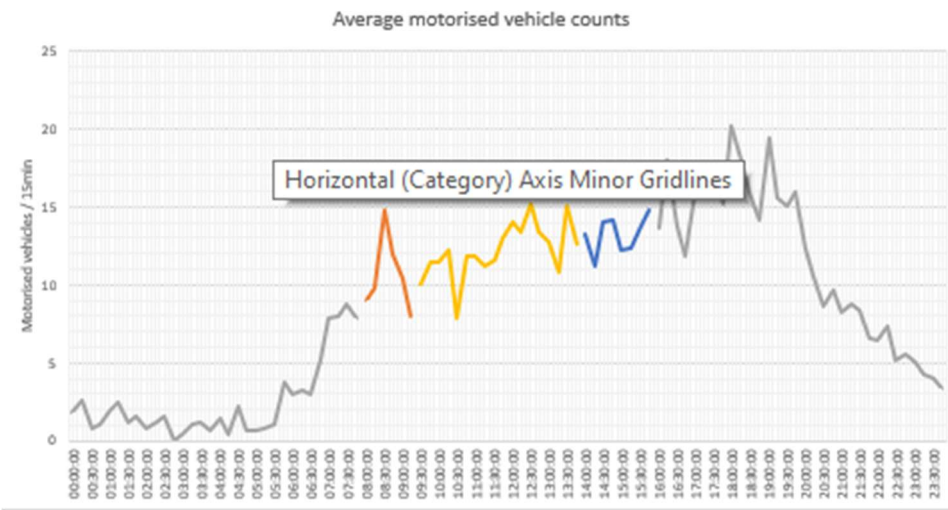
Traffic data from Smart sensors (Vivacity monitors) for neighbouring streets associated with specific HSS

Kimberley Road (neighbouring road to Atlee Close)

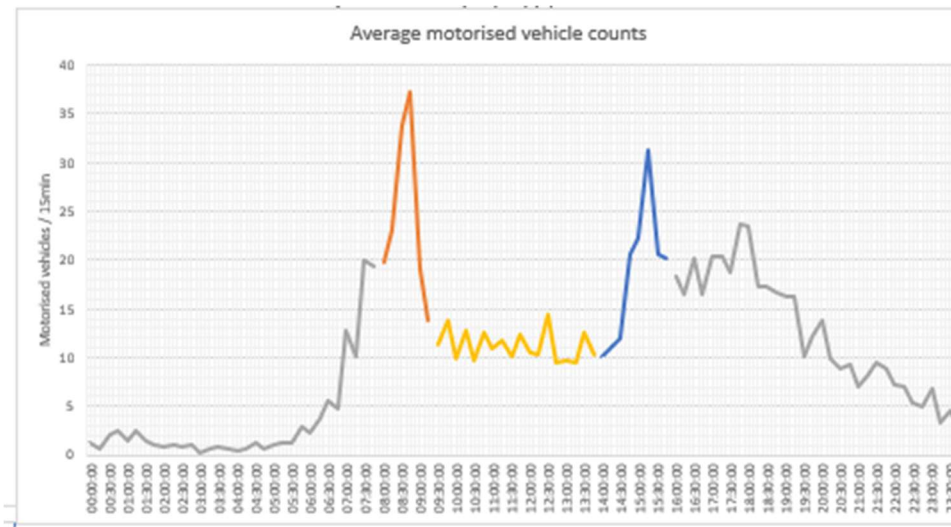
Sample week 1; School holidays; Monday 13 to Friday 17 February 2023

Sample week 2; School term time; Monday 20 to Friday 24 February 2023

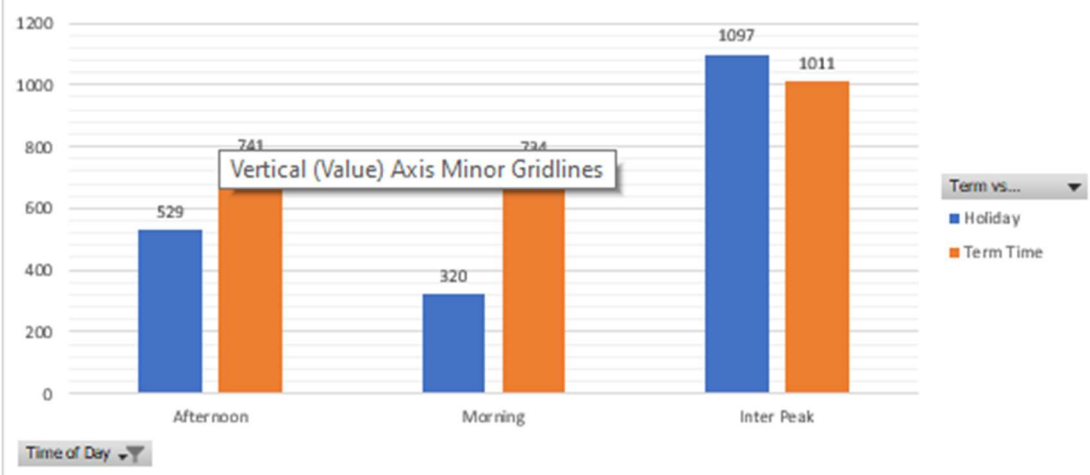
WEEK 1



WEEK 2



Healthy School Street total motorised vehicle count (combined)

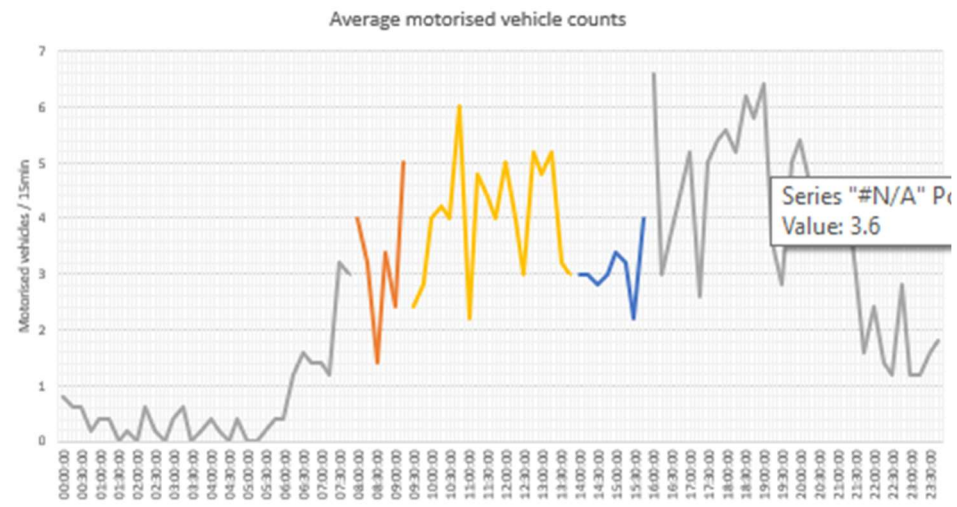


Dickensons Lane

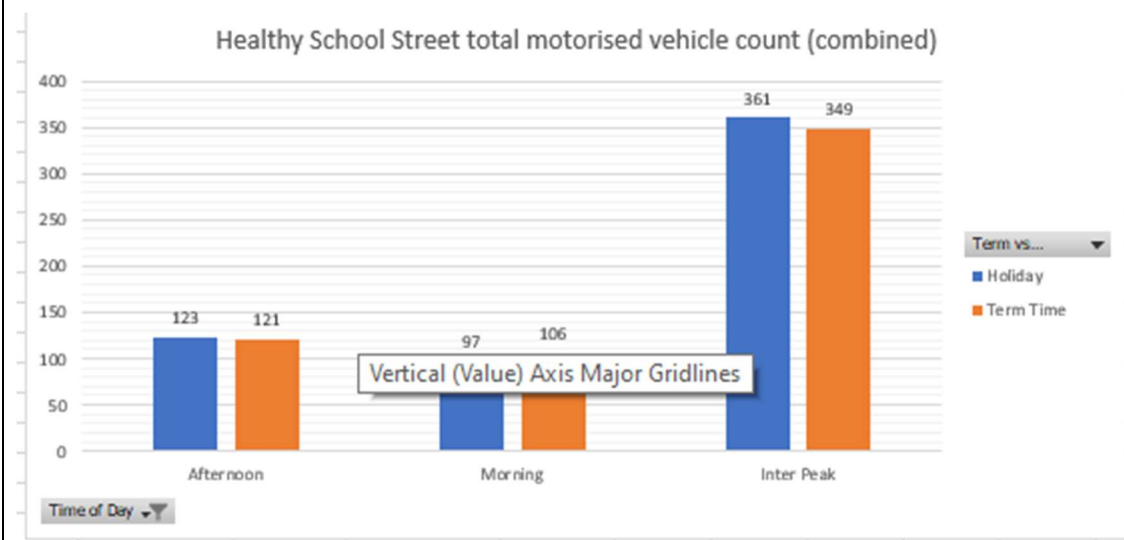
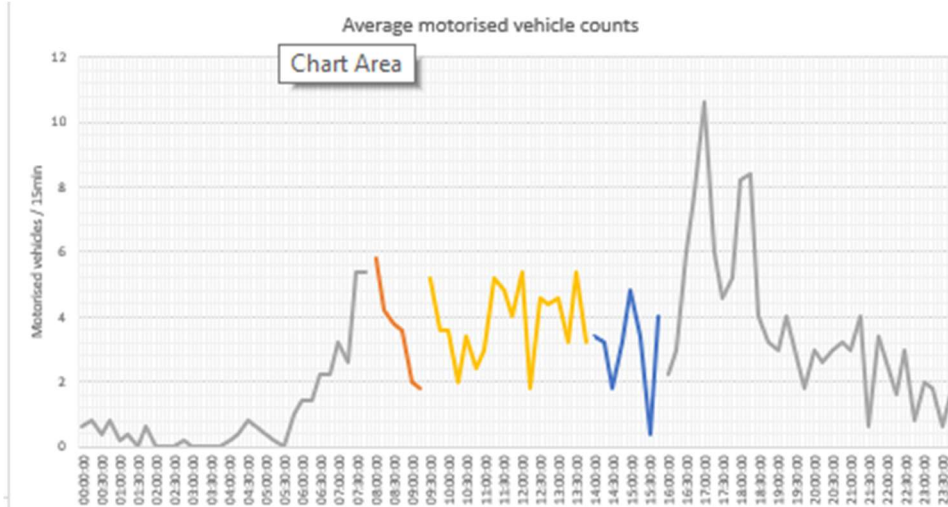
Sample week 1; School holidays; Monday 13 to Friday 17 February 2023

Sample week 2; School term time; Monday 20 to Friday 24 February 2023

WEEK 1



WEEK 2

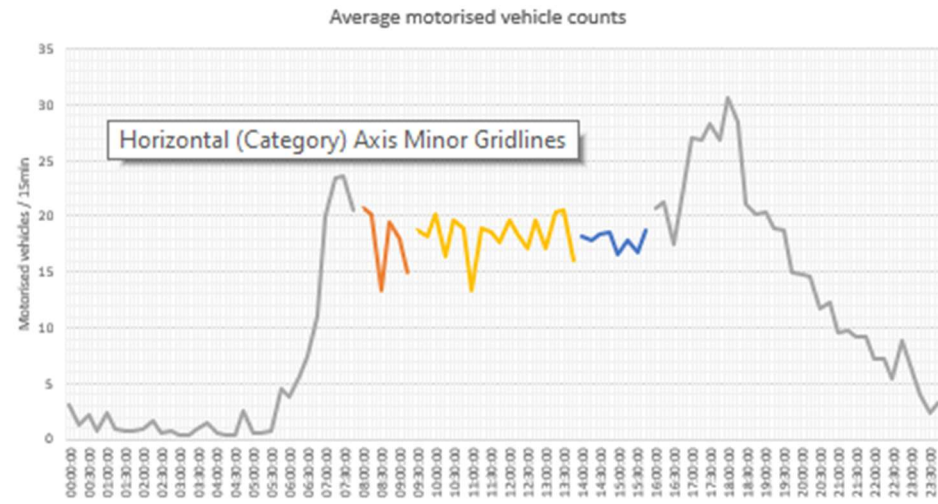


Woodside Green (neighbouring road to Dickenson's Lane)

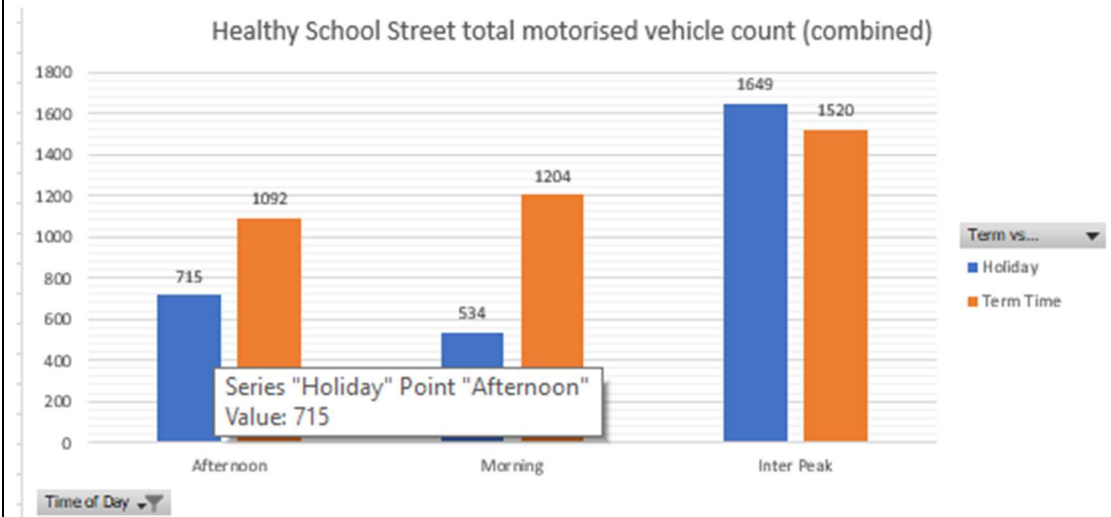
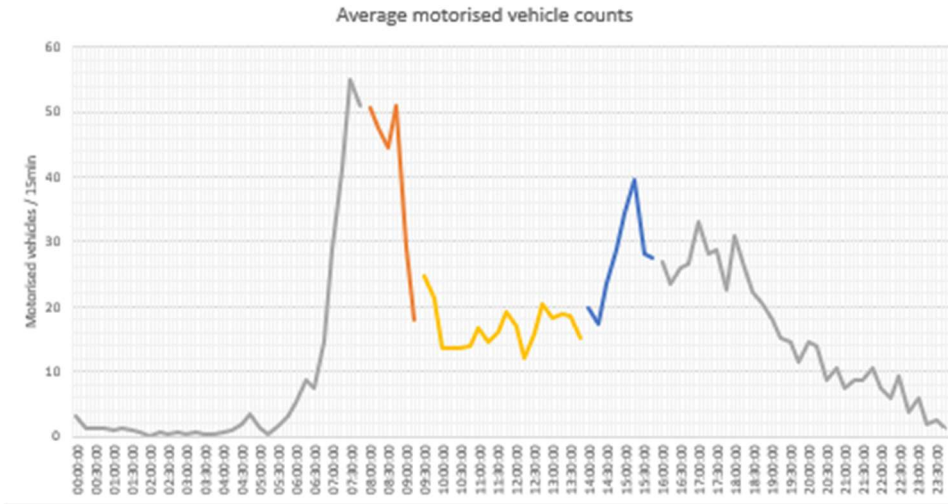
Sample week 1; School holidays; Monday 13 to Friday 17 February 2023

Sample week 2; School term time; Monday 20 to Friday 24 February 2023

WEEK 1



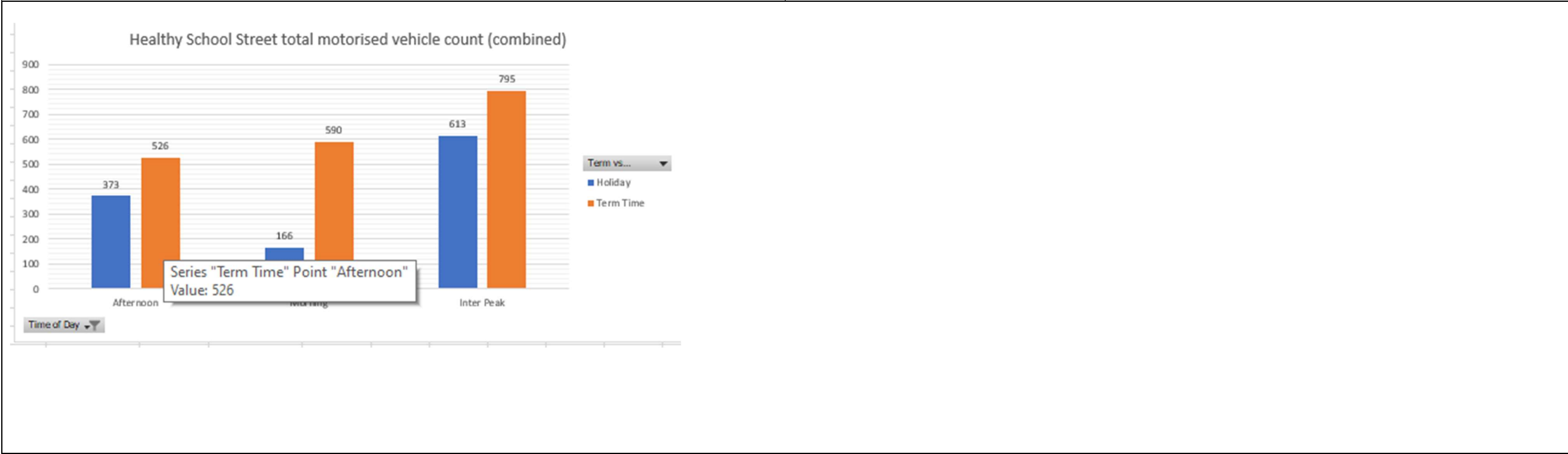
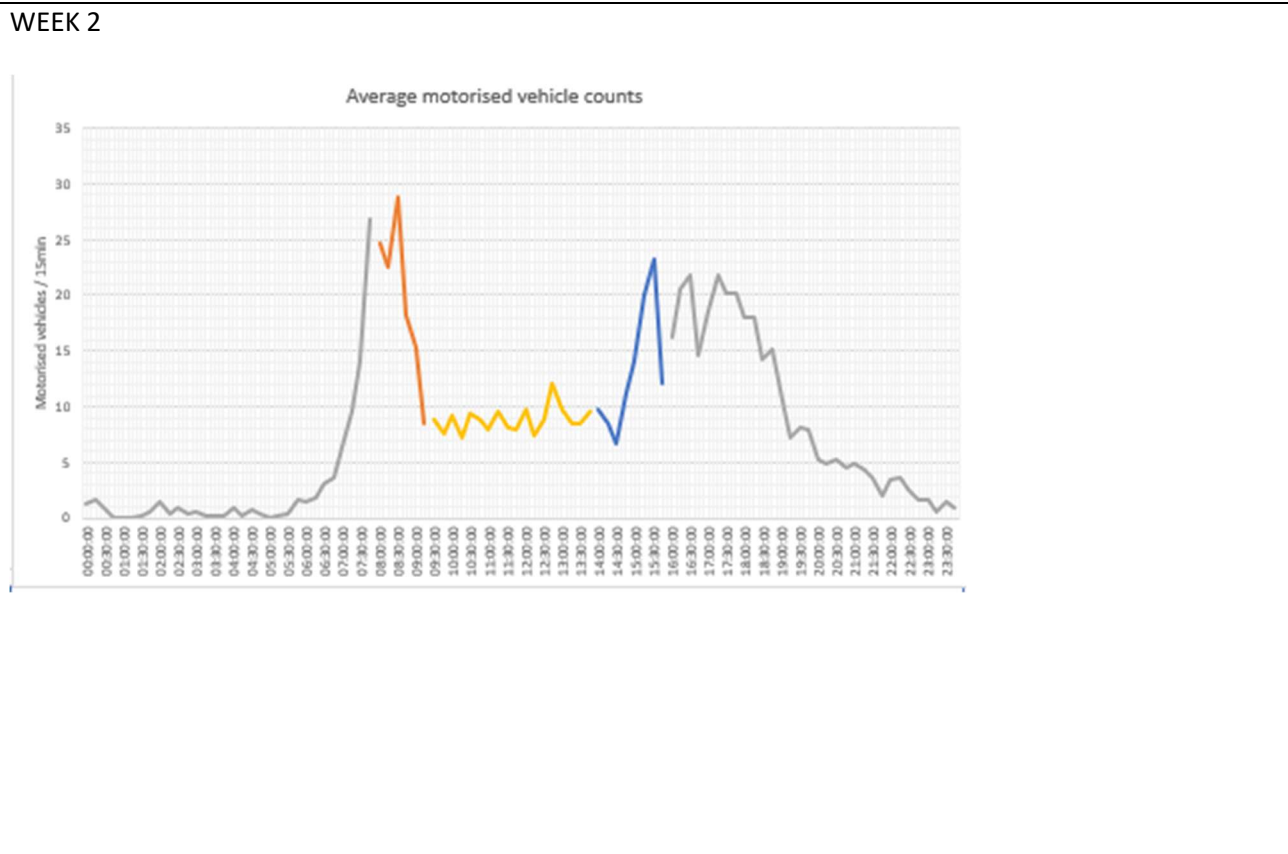
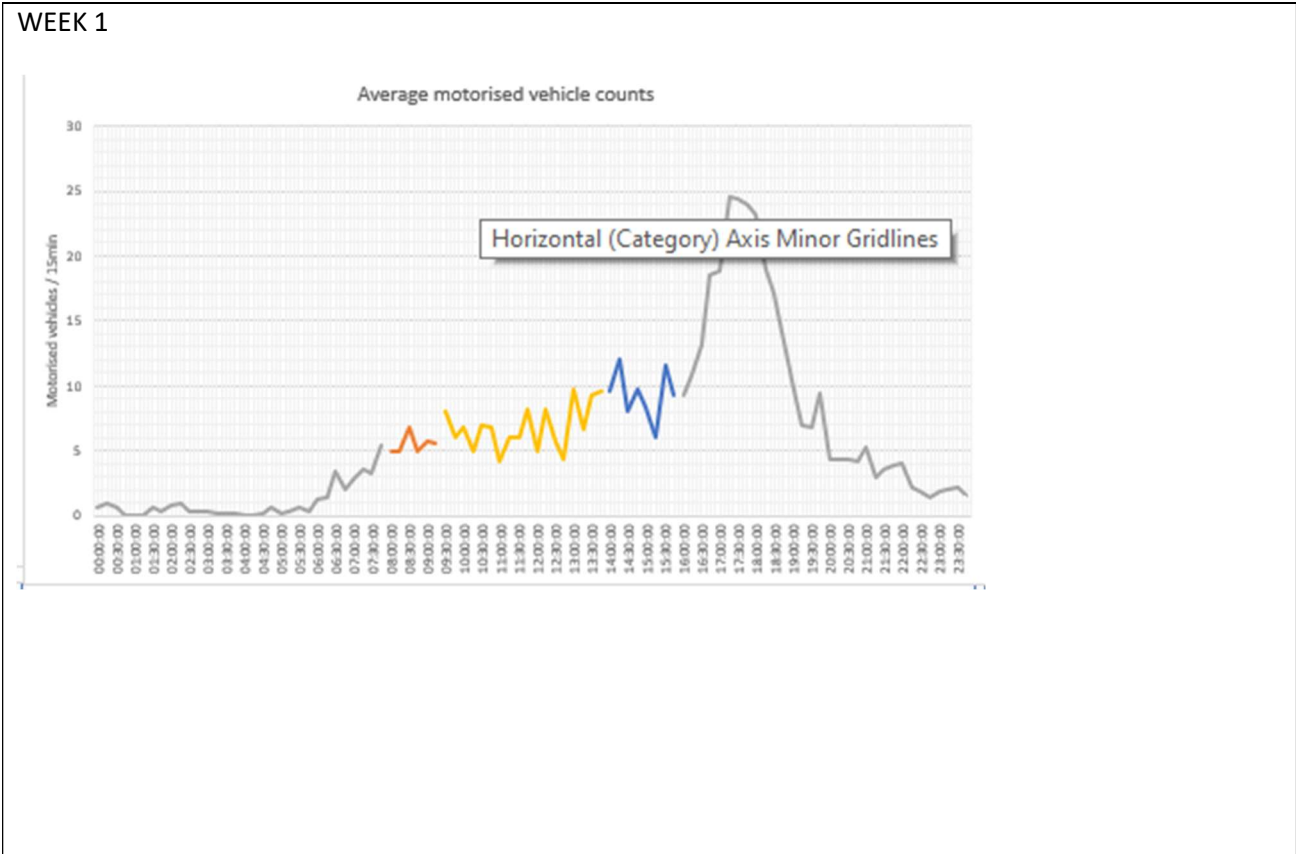
WEEK 2



Hailing Road

Sample week 1; School holidays; Monday 13 to Friday 17 February 2023

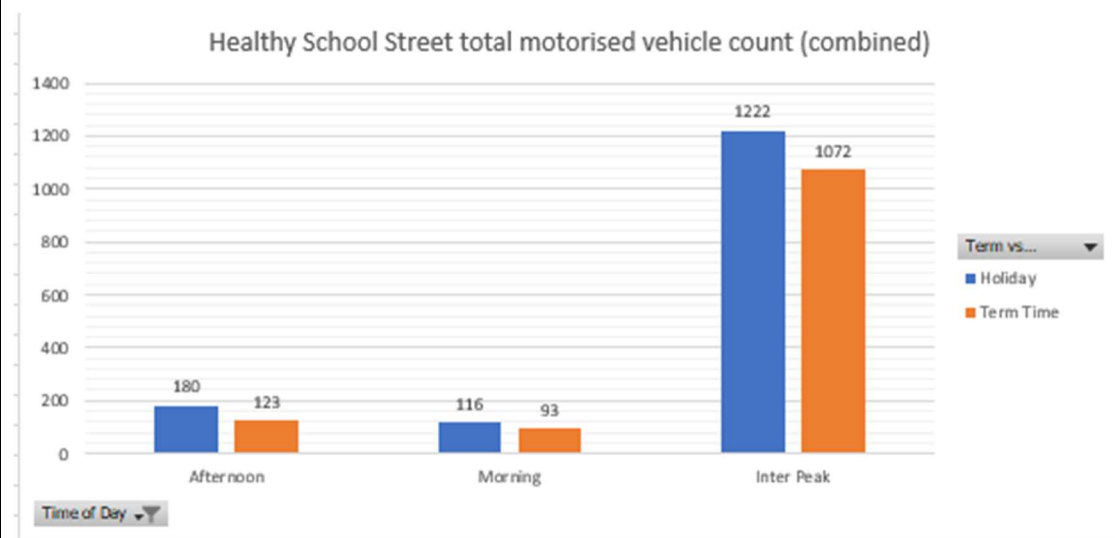
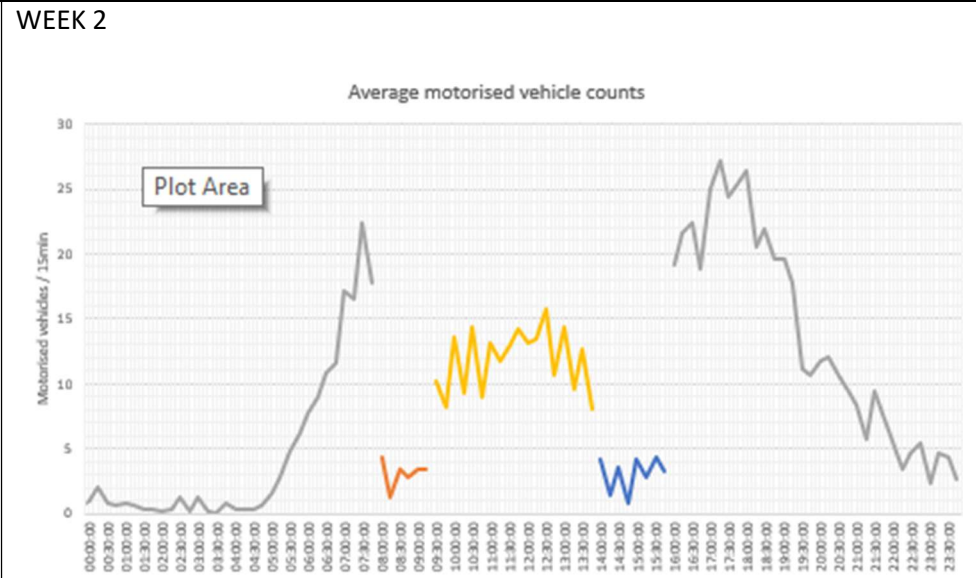
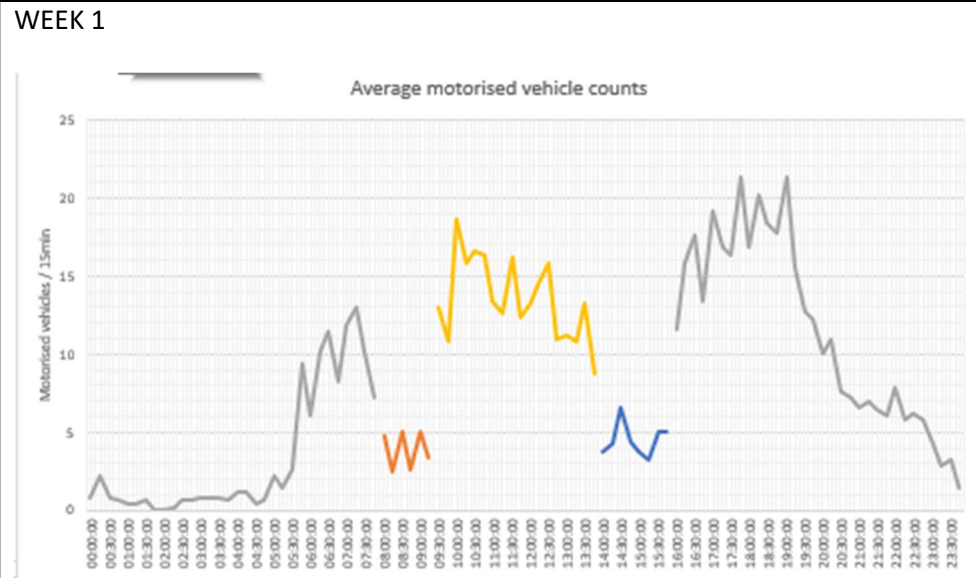
Sample week 2; School term time; Monday 20 to Friday 24 February 2023



Keston Avenue

Sample week 1; School holidays; Monday 13 to Friday 17 February 2023

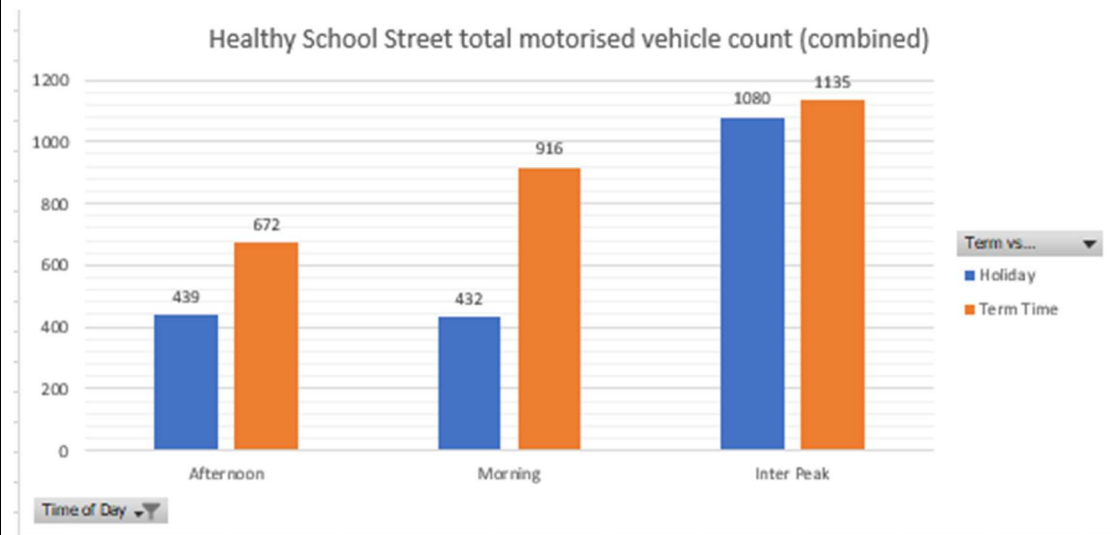
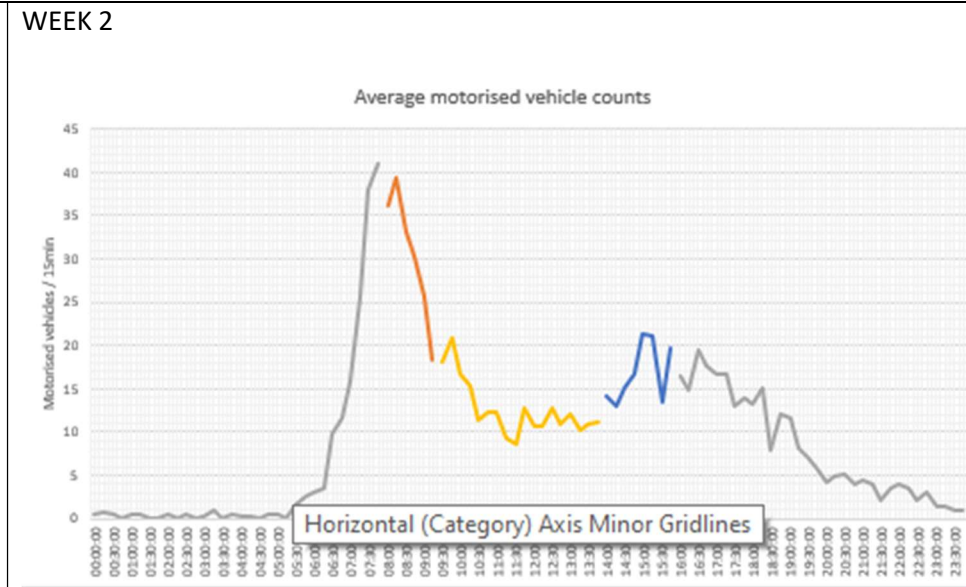
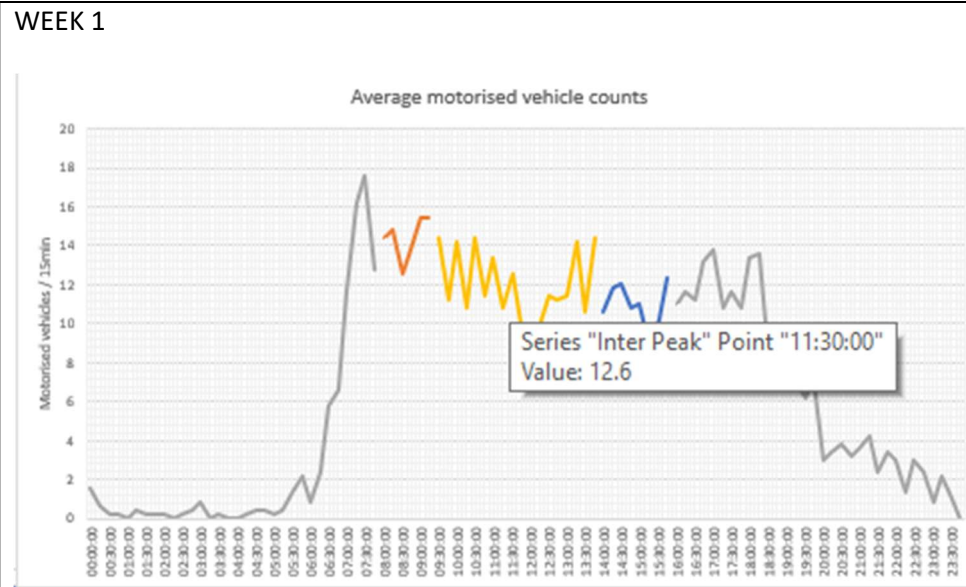
Sample week 2; School term time; Monday 20 to Friday 24 February 2023



Montpelier Road

Sample week 1; School holidays; Monday 13 to Friday 17 February 2023

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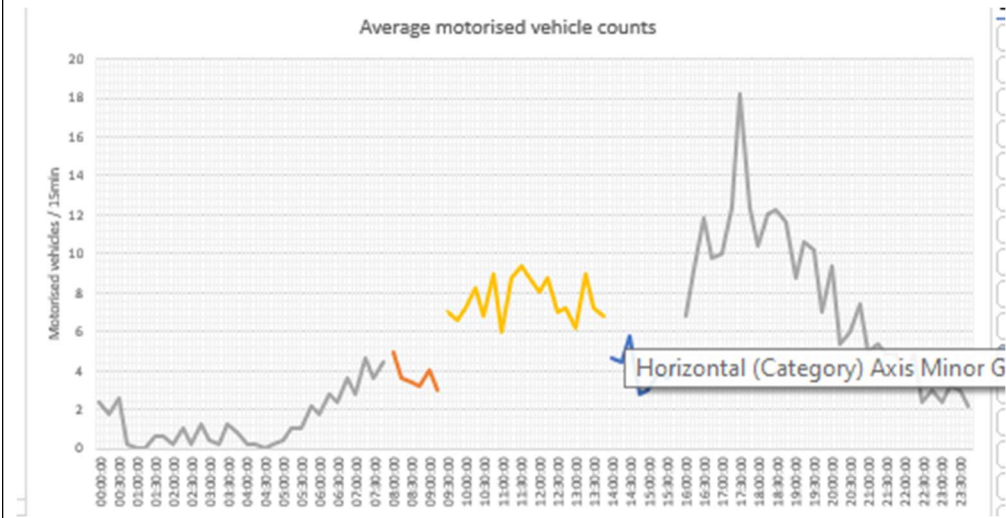


Sandown Road

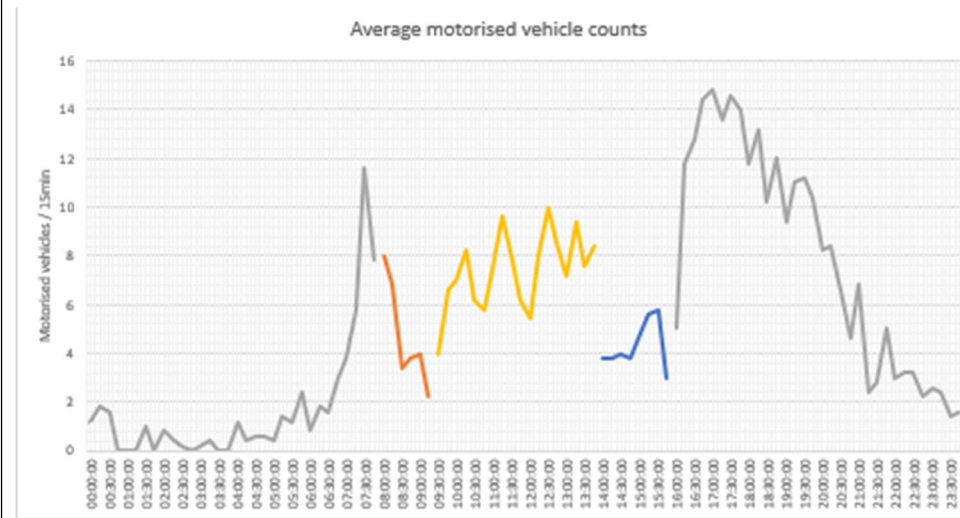
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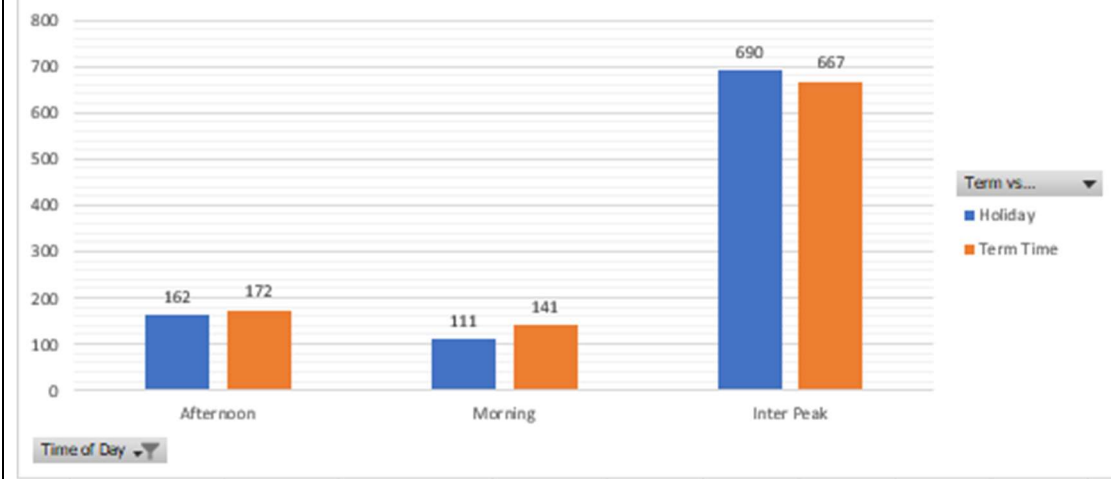
WEEK 1



WEEK 2



Healthy School Street total motorised vehicle count (combined)

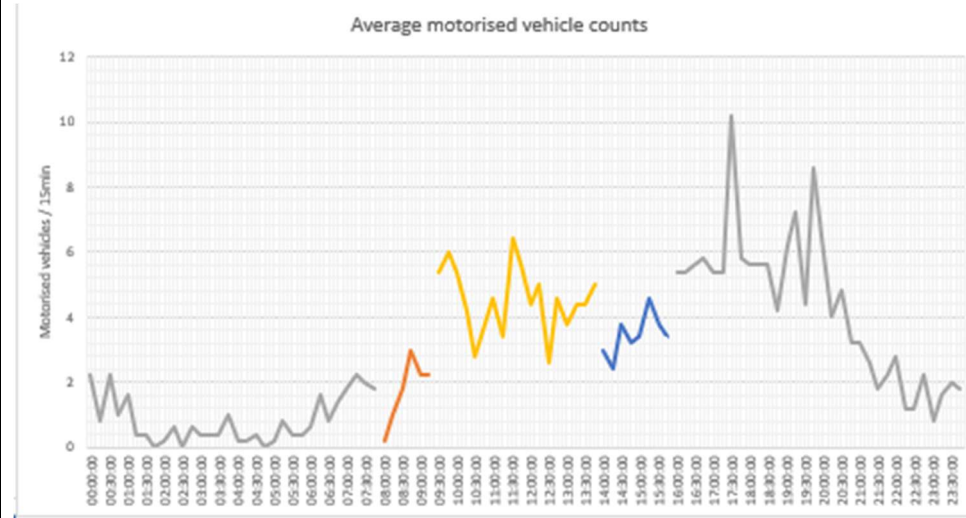


Oakley Road

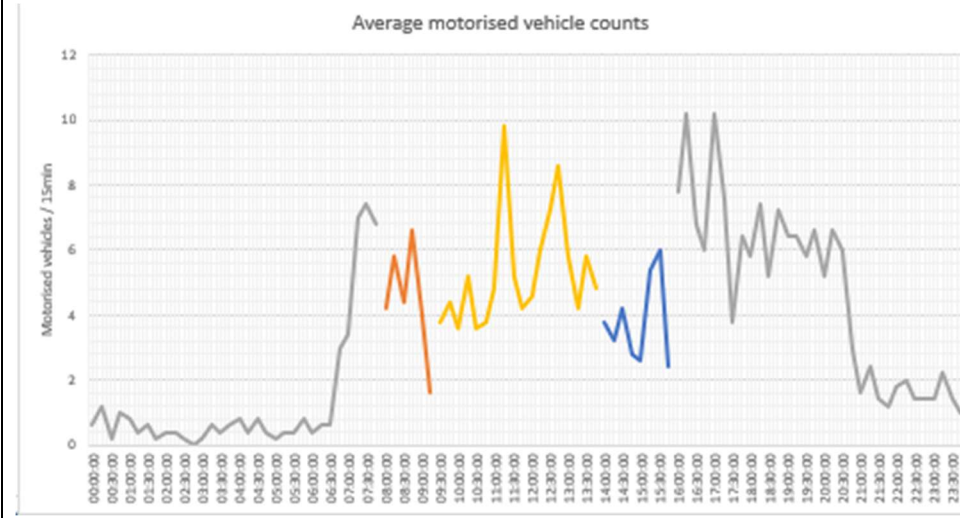
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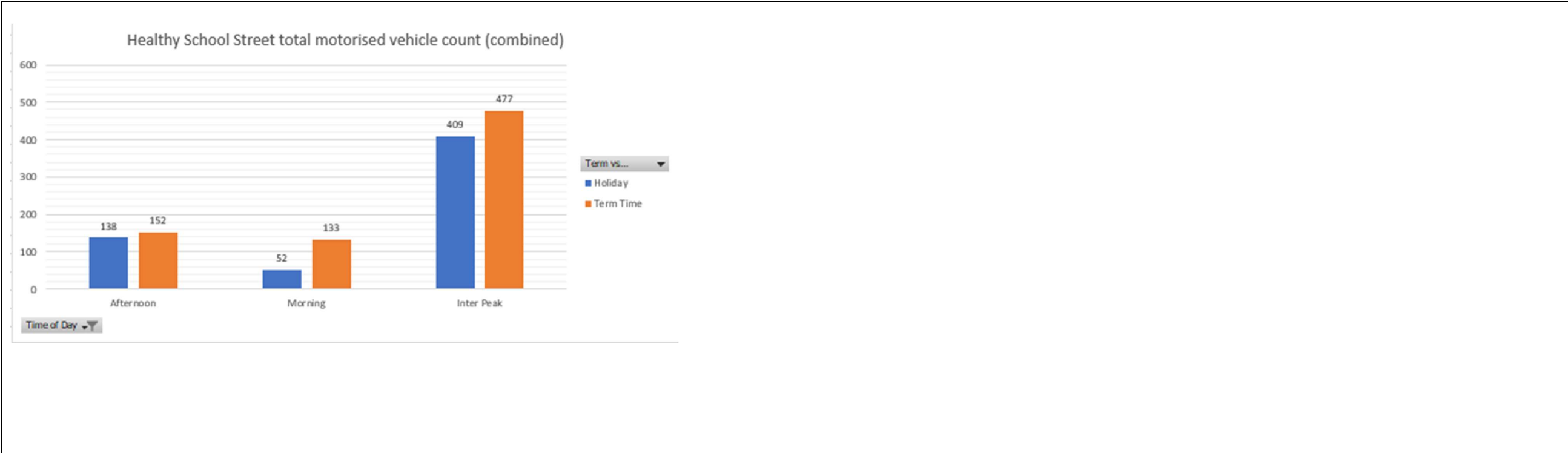
Sample week 2; School term time; Monday 20 to Friday 24 February 2023

WEEK 1



WEEK 2



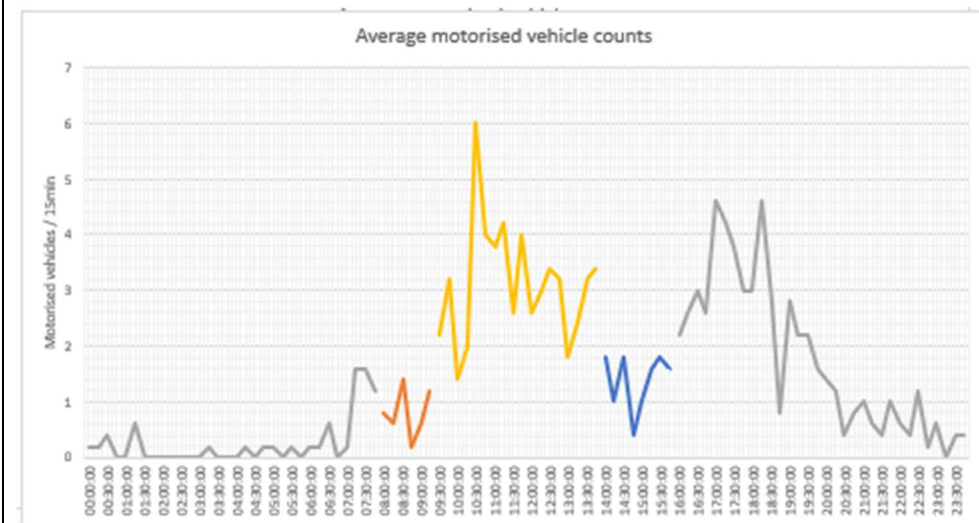


Southcote Road

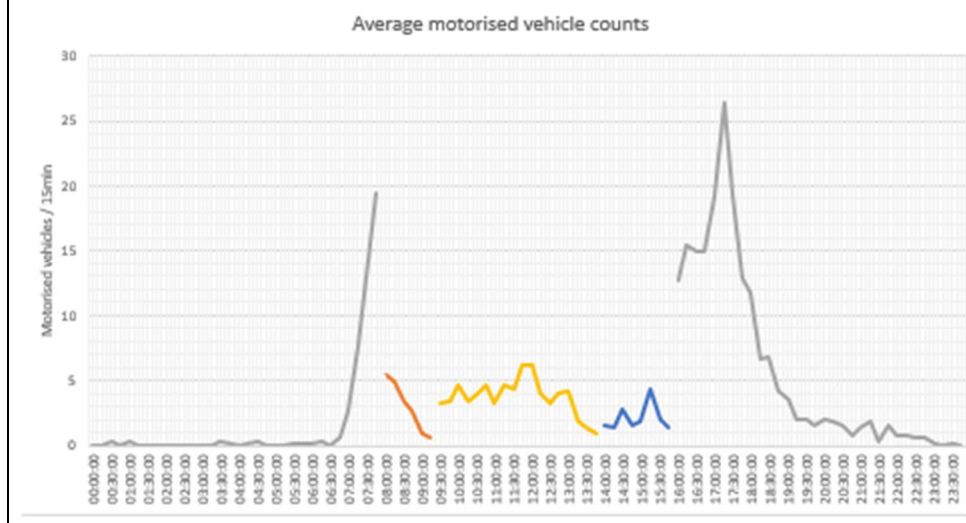
Sample week 1; School holidays; Monday 13 to Friday 17 February 2023

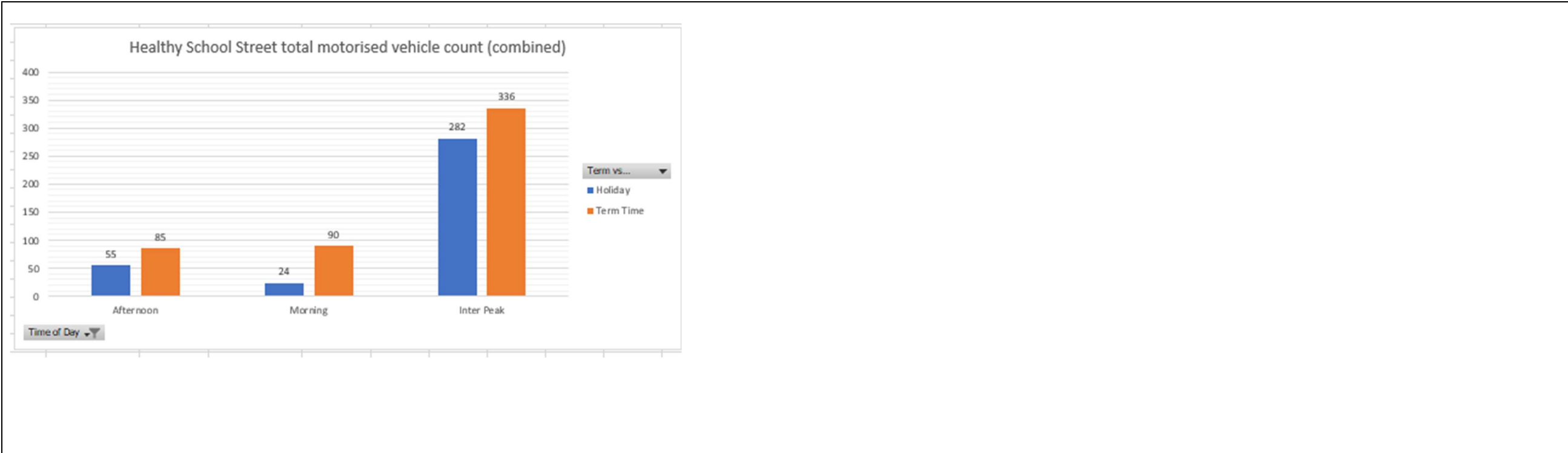
Sample week 2; School term time; Monday 20 to Friday 24 February 2023

WEEK 1



WEEK 2

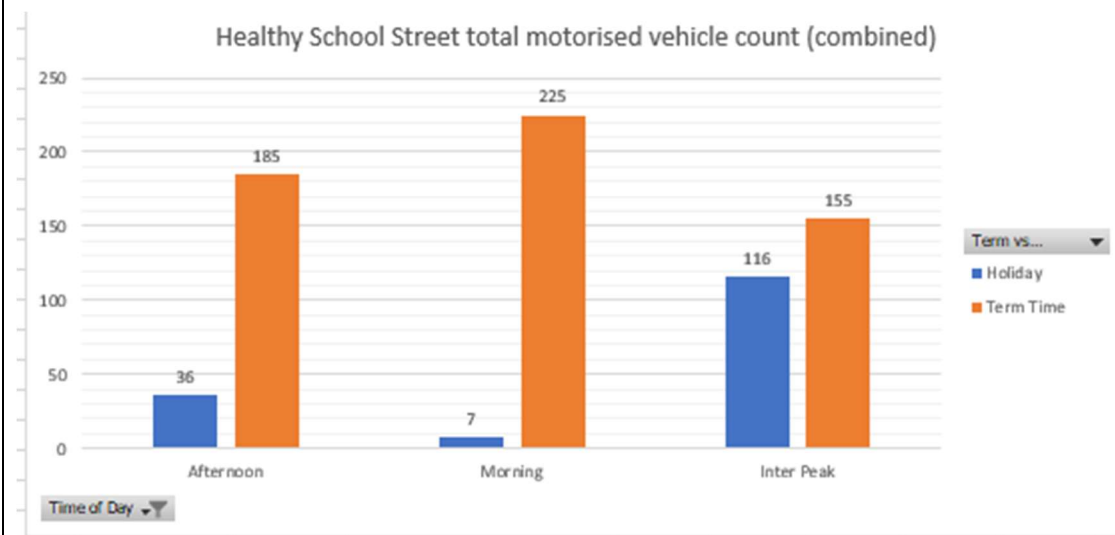
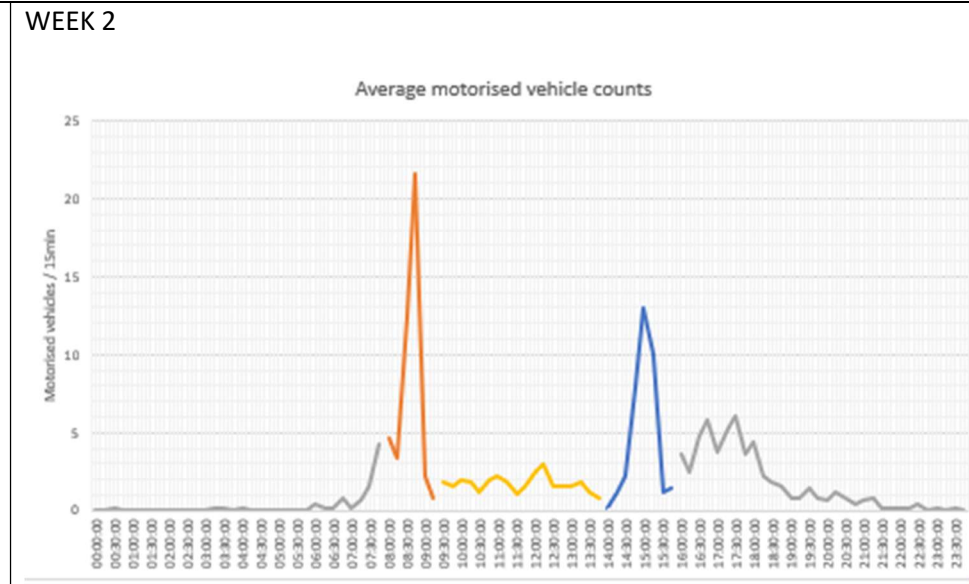
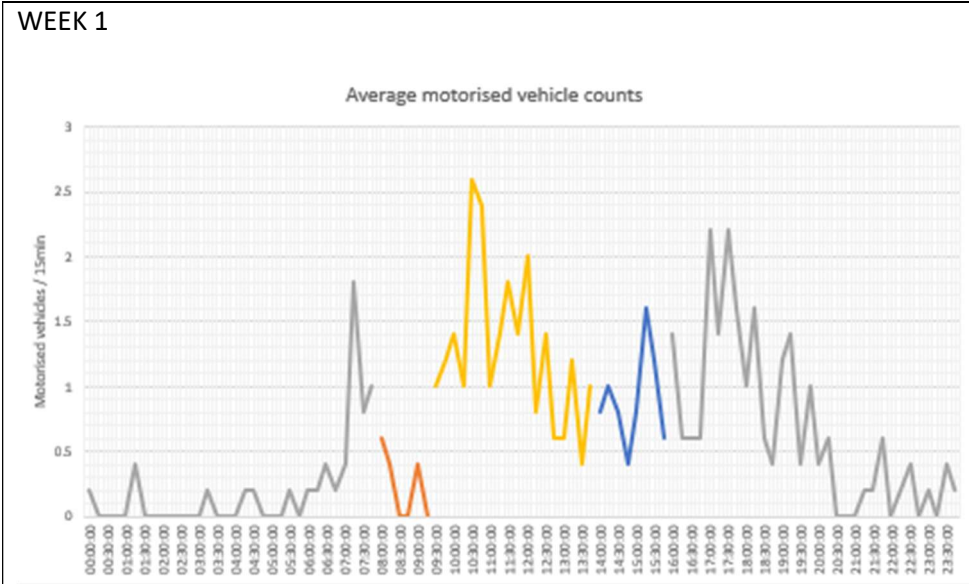




Ellenbridge Road (neighbouring road to Southcote Rd)

Sample week 1; School holidays; Monday 13 to Friday 17 February 2023

Sample week 2; School term time; Monday 20 to Friday 24 February 2023

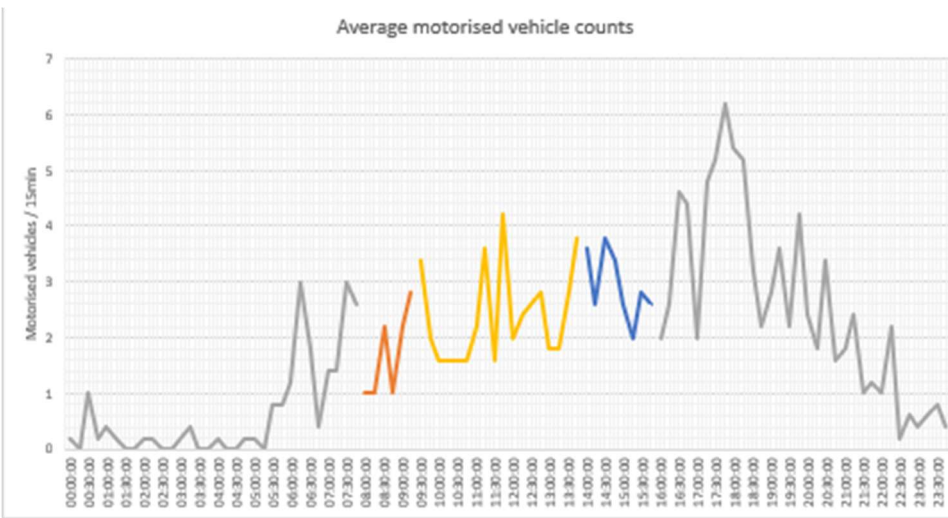


Thomson Crescent

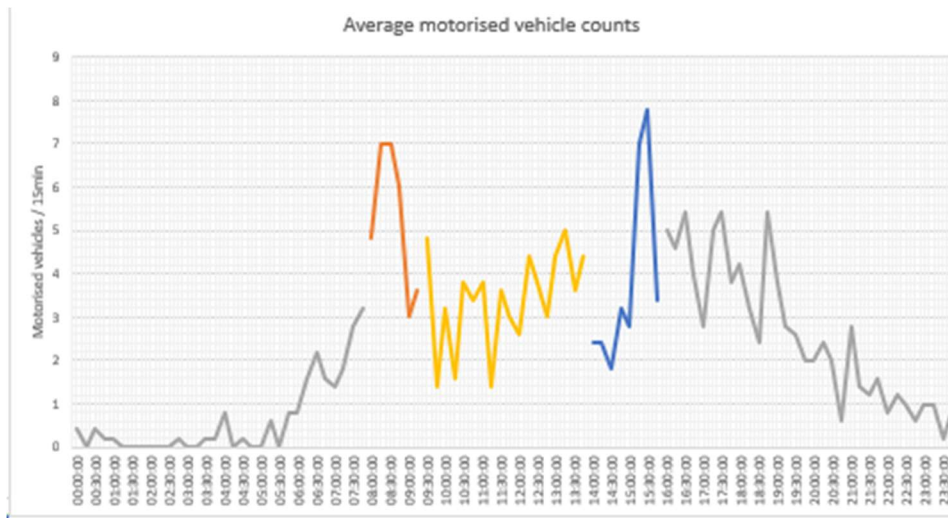
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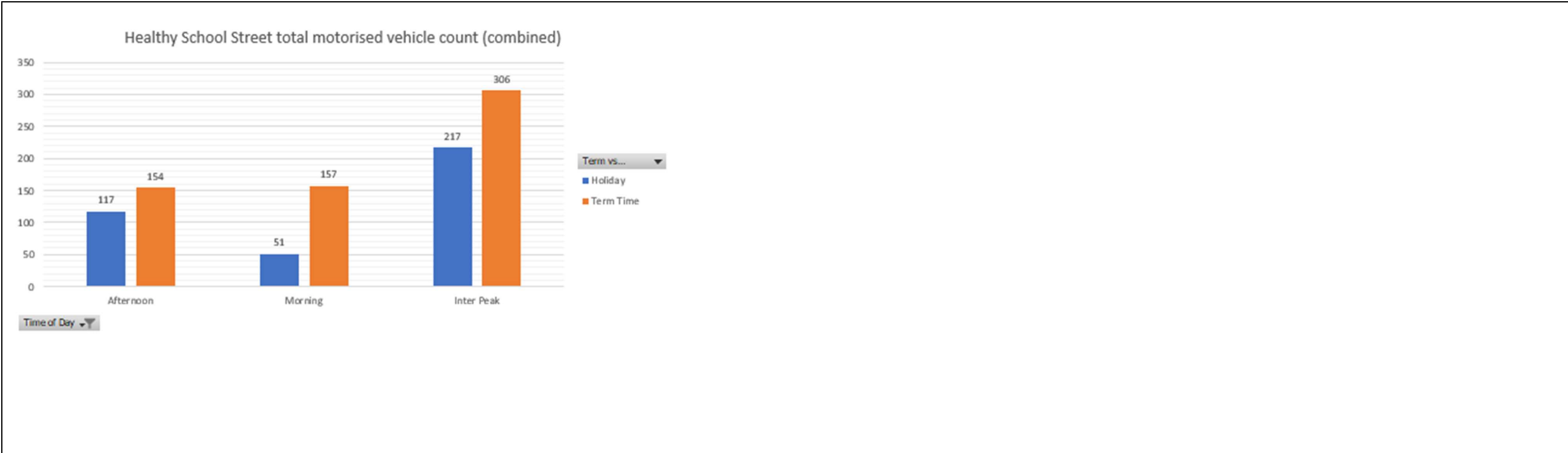
Sample week 2; School term time; Monday 20 to Friday 24 February 2023

WEEK 1



WEEK 2

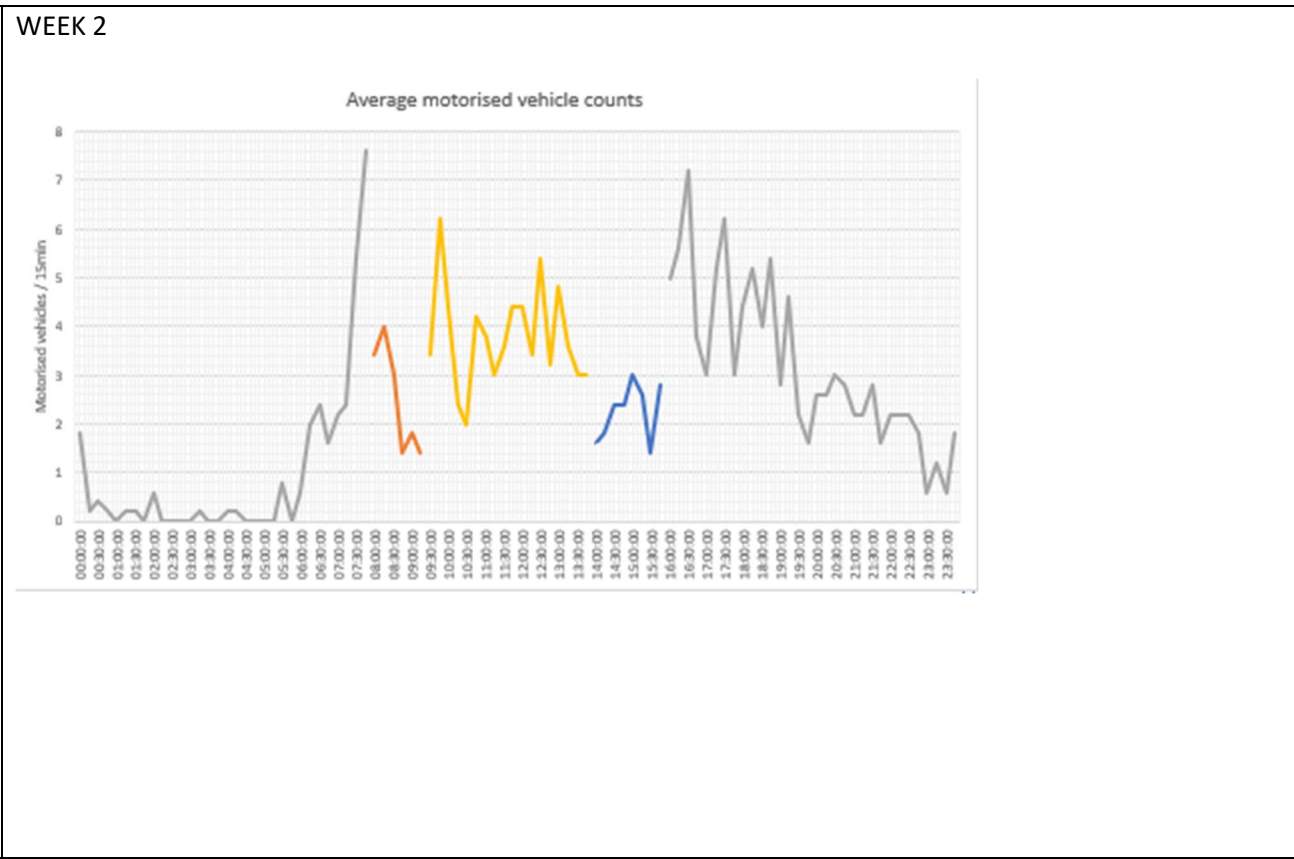
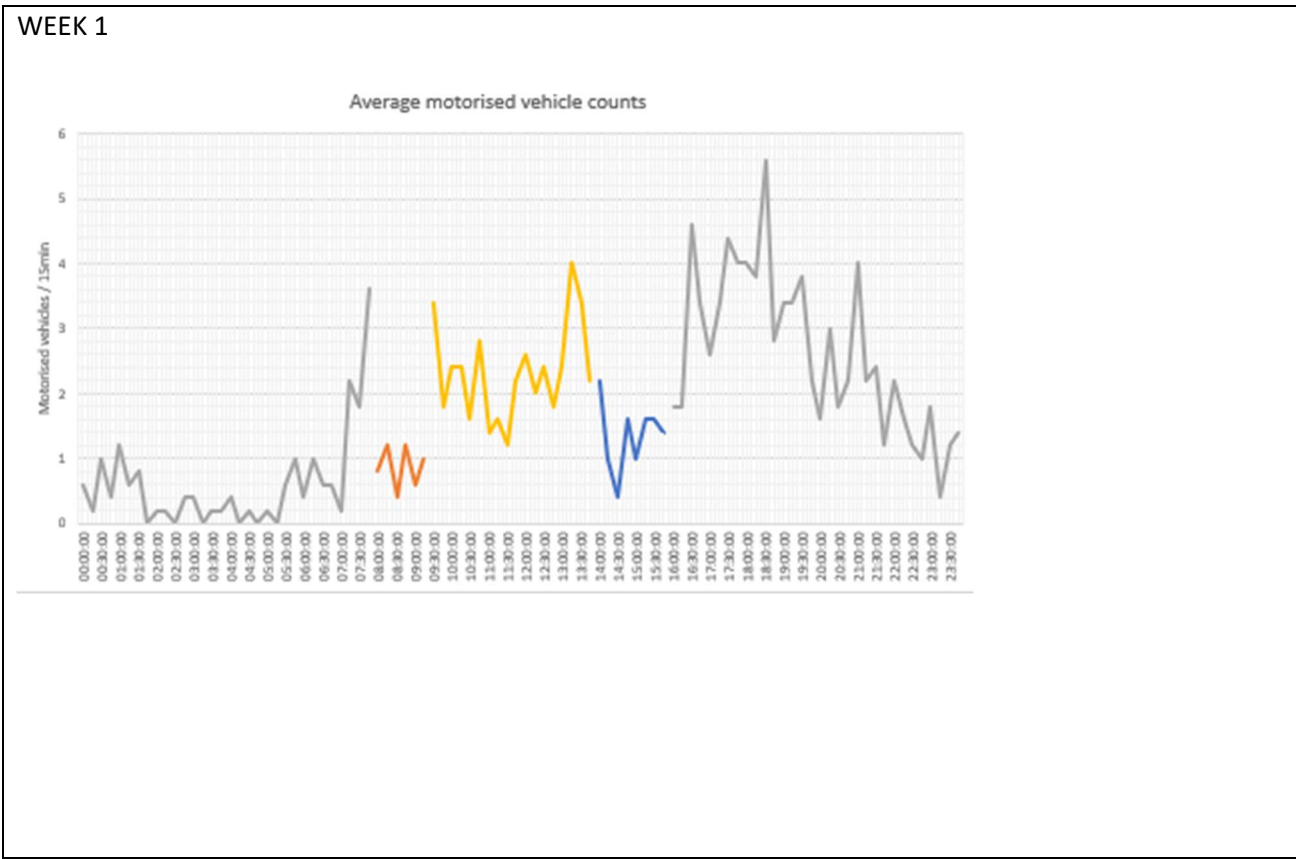


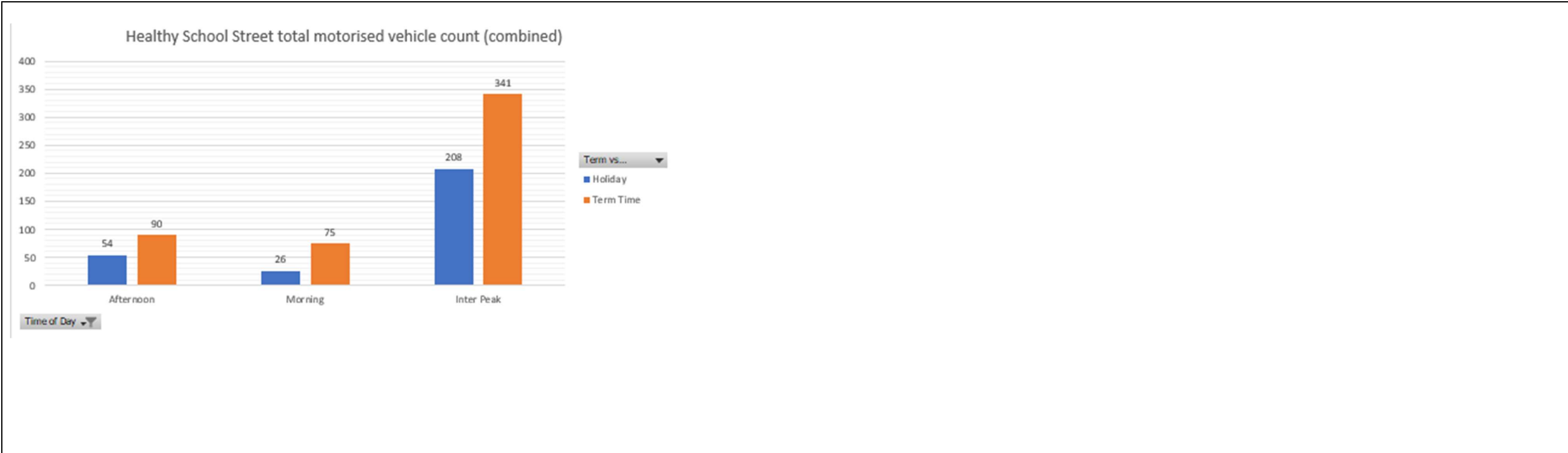


Chapman Road (neighbouring Rd to Thompson Crescent)

Sample week 1; School holidays; Monday 13 to Friday 17 February 2023

Sample week 2; School term time; Monday 20 to Friday 24 February 2023



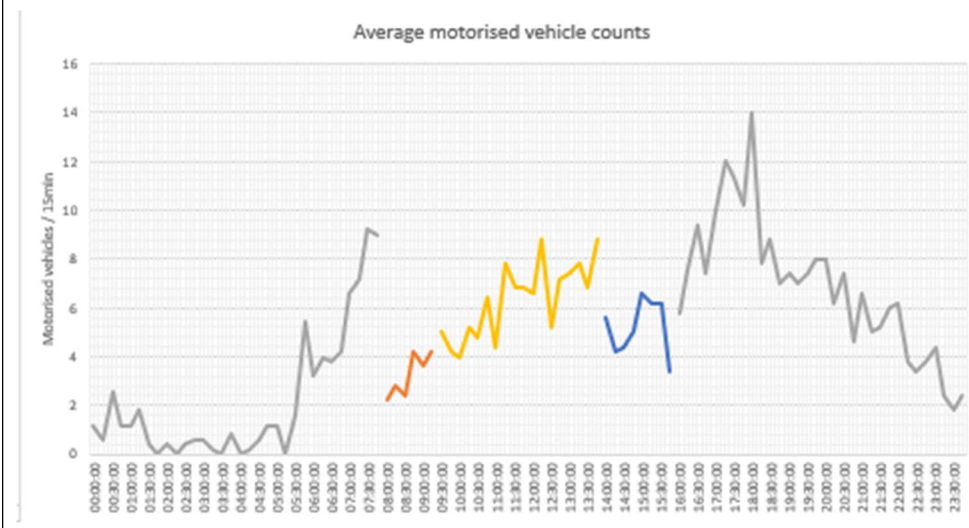


S24 Kingsley Road (neighbouring road to Thomson Crescent)

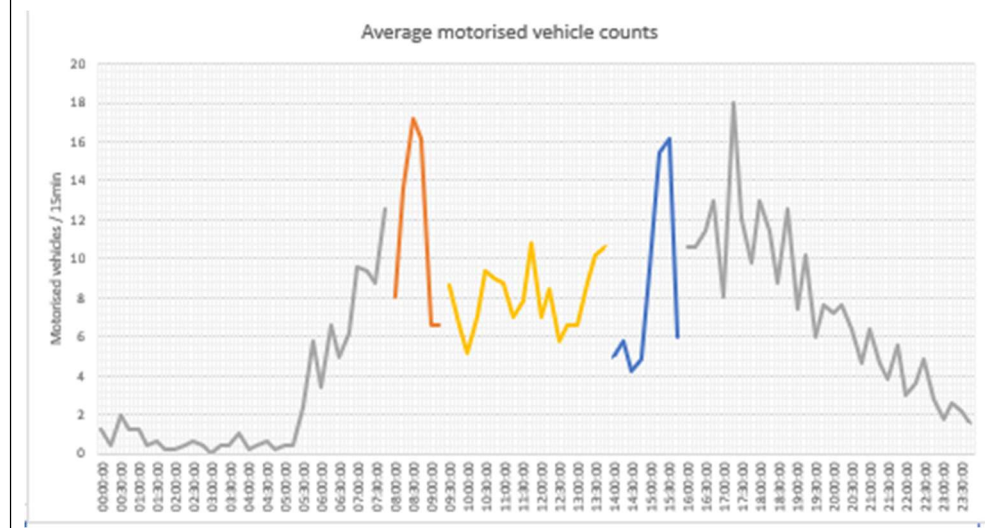
Sample week 1; School holidays; Monday 13 to Friday 17 February 2023

Sample week 2; School term time; Monday 20 to Friday 24 February 2023

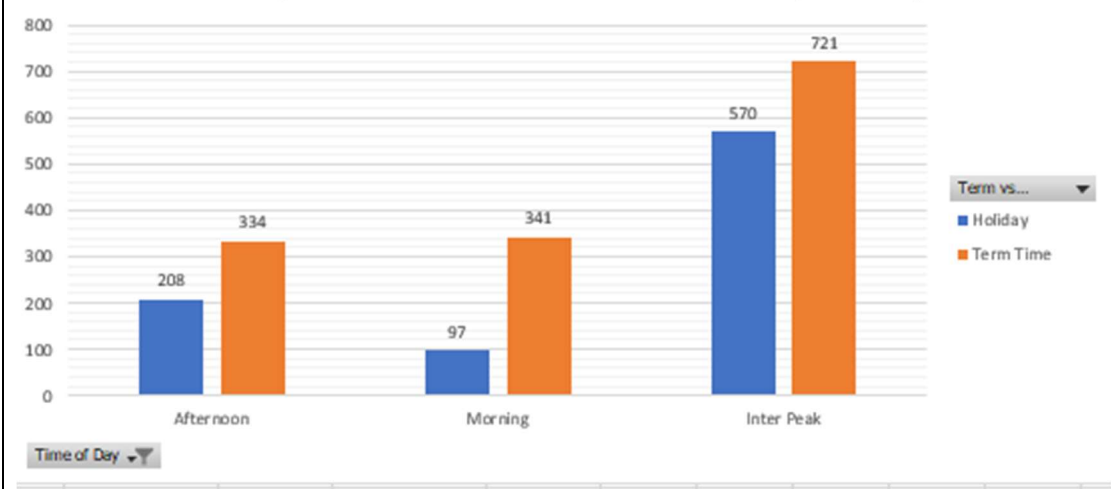
WEEK 1



WEEK 2



Healthy School Street total motorised vehicle count (combined)

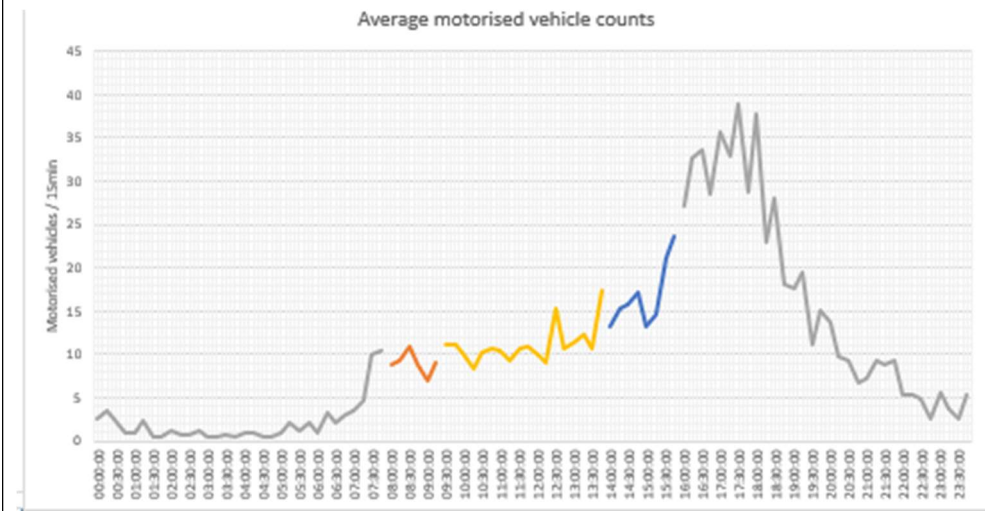


Bradley Road (neighbouring road to Woodend)

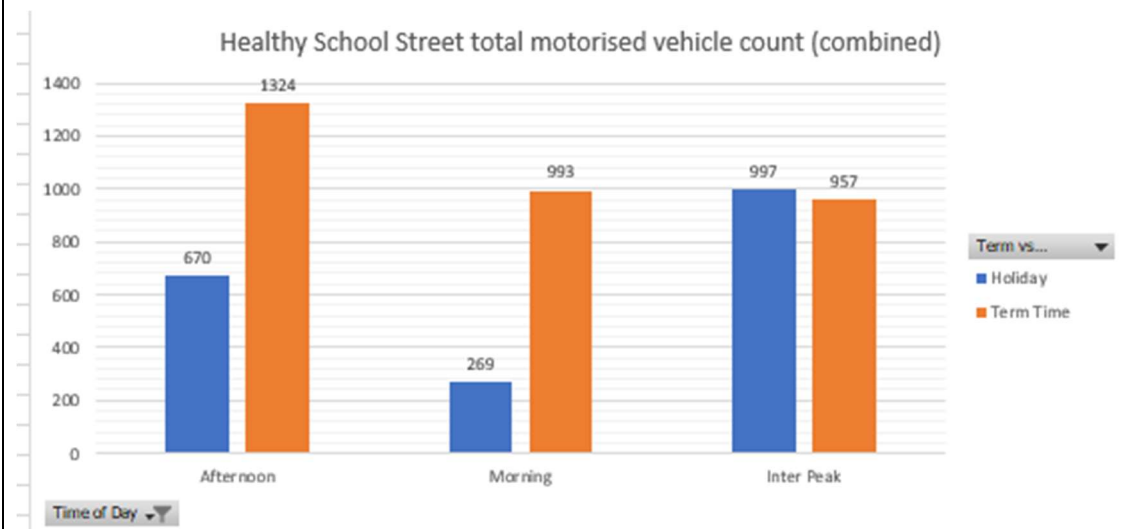
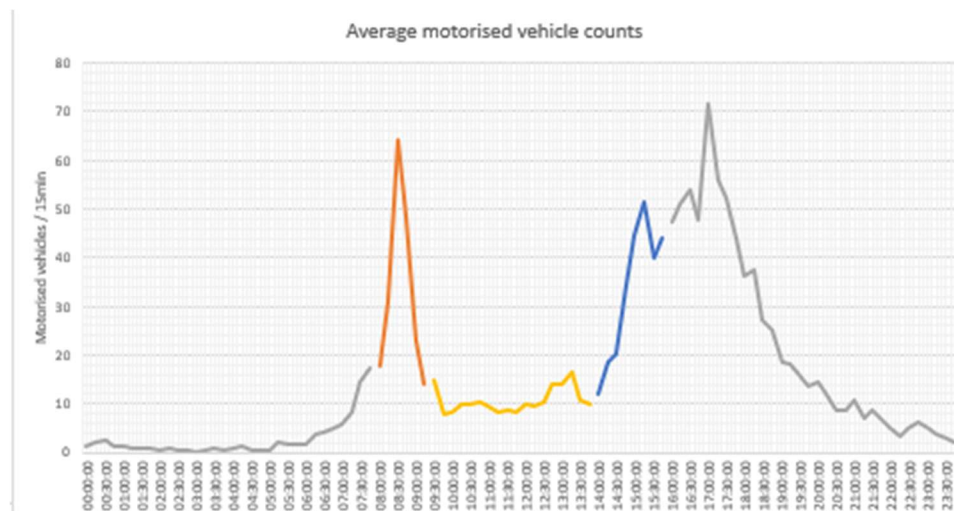
Sample week 1; School holidays; Monday 13 to Friday 17 February 2023

Sample week 2; School term time; Monday 20 to Friday 24 February 2023

WEEK 1



WEEK 2



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APPENDIX C: AIR QUALITY MONITORING

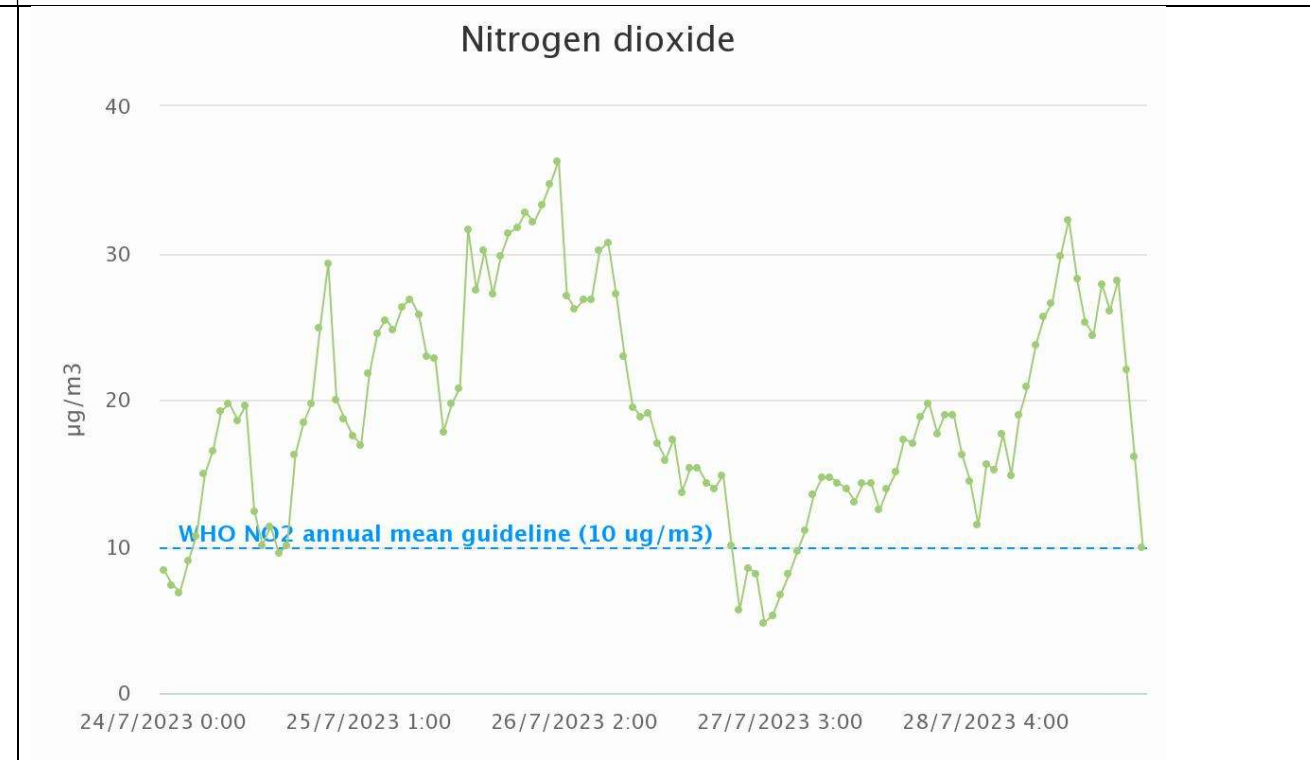
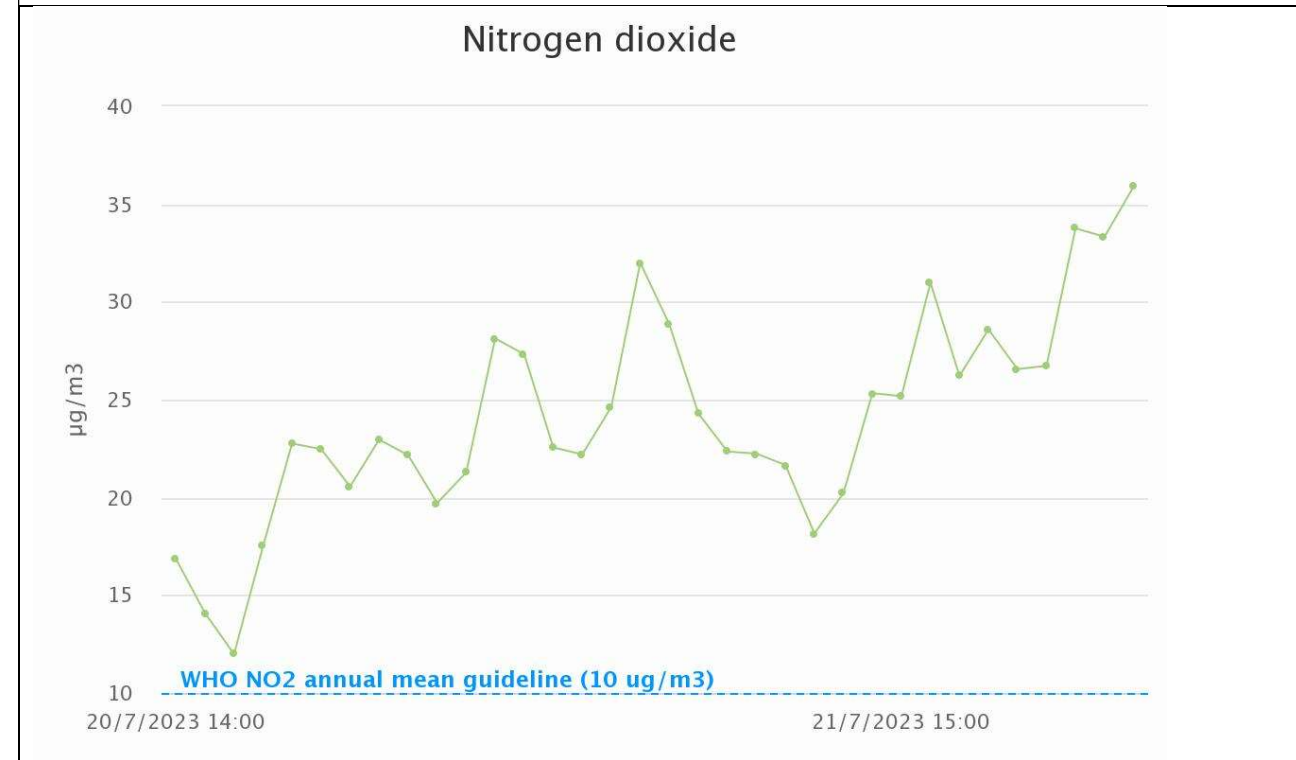
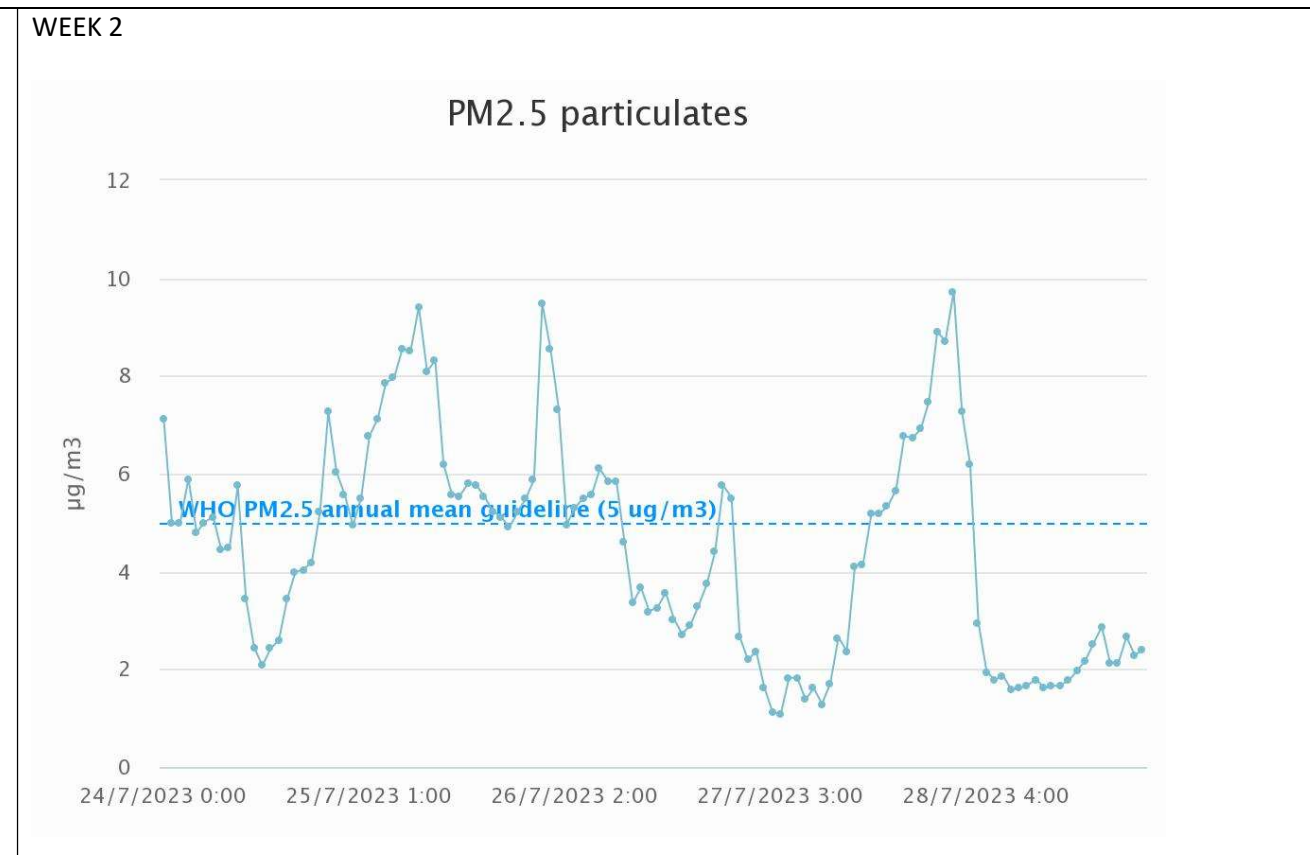
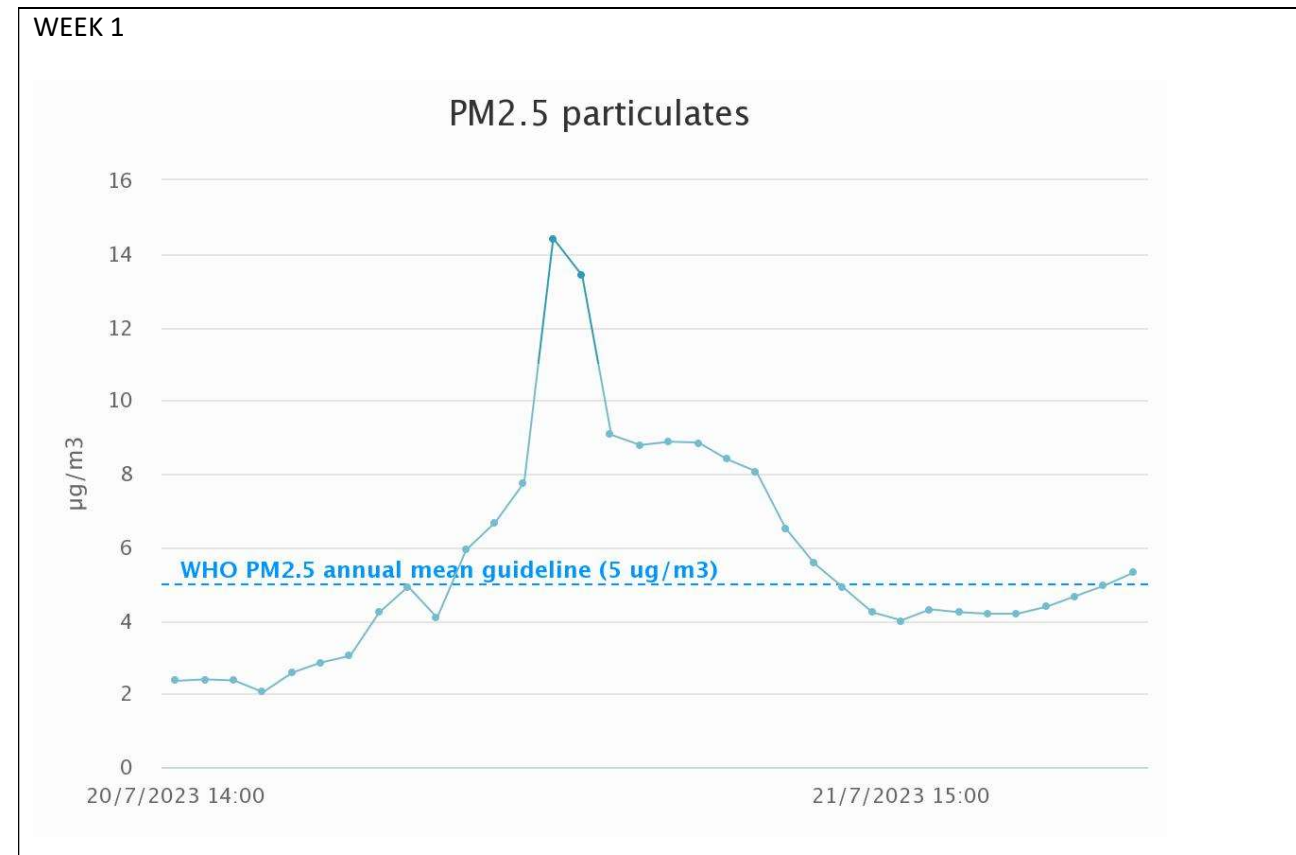
Healthy School Street scheme	Road Name	Lamp column no	Postcode	Location (Google)	Breathe London air quality data link	UK annual mean objective met for PM2.5 and NO2?	WHO annual mean guideline met for PM2.5 and NO2?	WHO daily mean guideline met for PM2.5 and NO2?
Ecclesbourne Primary School	Attlee Close	3	CR7 7FA	9 Atlee Cl - Google Maps	CLDP0485	Yes/Yes	No/No	Yes/No
St Thomas Becket Catholic Primary School	Dickenson's Lane	4	SE25 5HS	40 Dickenson's Ln - Google Maps	CLDP0488	Yes/Yes	No/No	Yes/Yes
Harris Primary Academy Haling Park	Haling Road	3	CR2 6HS	84 Haling Rd - Google Maps	CLDP0486	Yes/Yes	No/No	Yes/Yes
Keston Primary School	Keston Avenue	3	CR5 1HP	14 Keston Ave - Google Maps	CLDP0478	Yes/Yes	No/No	Yes/Yes
Keston Primary School	Court Avenue	11	CR5 1HE	49 Court Ave - Google Maps	CLDP0490	Yes/Yes	No/No	Yes/Yes
Downsview Primary School	Marston Way	3	SE19 3JB	71 Marston Way - Google Maps	CLDP0481	Yes/Yes	No/No	Yes/Yes
Downsview Primary School	Biggin Way	4	SE19 3XF	18 Biggin Way - Google Maps	CLDP0489	Yes/Yes	No/No	Yes/Yes

Healthy School Street scheme	Road Name	Lamp column no	Postcode	Location (Google)	Breathe London air quality data link	UK annual mean objective met for PM2.5 and NO2?	WHO annual mean guideline met for PM2.5 and NO2?	WHO daily mean guideline met for PM2.5 and NO2?
Christ Church CoE Primary School	Montpelier Road	2	CR8 2QE	2 Montpelier Rd - Google Maps	CLDP0480	Unknown/Yes	Unknown/No	Unknown/Yes
Oasis Academy Reylands	Oakley Road	4	SE25 4XQ	44 Oakley Rd - Google Maps	CLDP0479	Yes/Yes	No/No	Yes/Yes
Oasis Academy Reylands	Sandown Road	3	SE25 4XD	27 Sandown Rd - Google Maps	CLDP0487	Yes/Yes	No/No	Yes/Yes
Ridgeway Primary School	Southcote Road	8	CR2 0EQ	15 Southcote Rd - Google Maps	CLDP0482	Yes/Yes	No/No	Yes/No
Kingsley Primary Academy	Thomson Crescent	8	CR0 3JT	45 Thomson Cres - Google Maps	CLDP0484	Yes/Yes	No/No	Yes/Yes
Kingsley Primary Academy	Chapman Road	11	CR0 3NW	102 Chapman Rd - Google Maps	CLDP0483	Yes/Yes	No/No	Yes/Yes
St Joseph Catholic Junior School	Woodend	4	SE19 3NU	24 Woodend - Google Maps	CLDP0491	Yes/Yes	No/No	Yes/Yes

Ecclesbourne Primary School (Attlee Close)

Sample week 1; School term time; Monday 17 to Friday 21 July 2023. NB: only 2 days of data recorded due to issue with sensor functionality

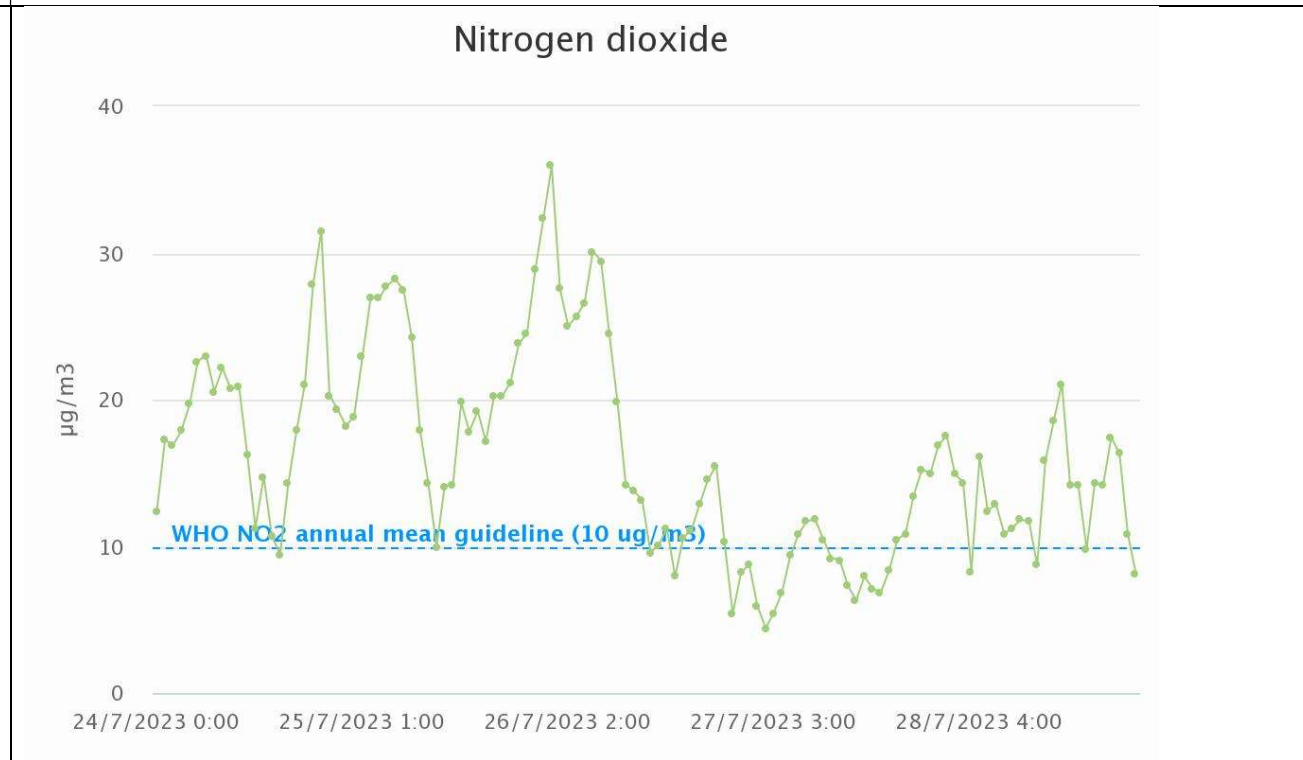
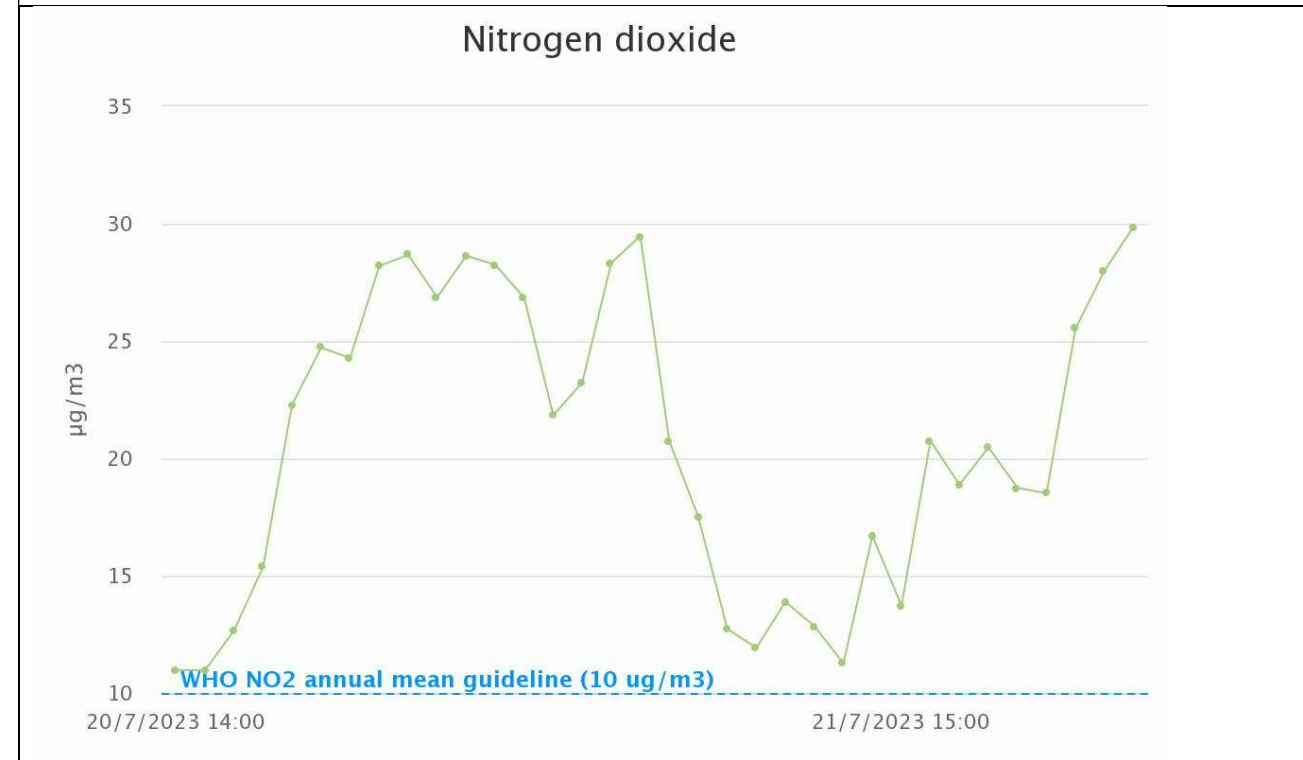
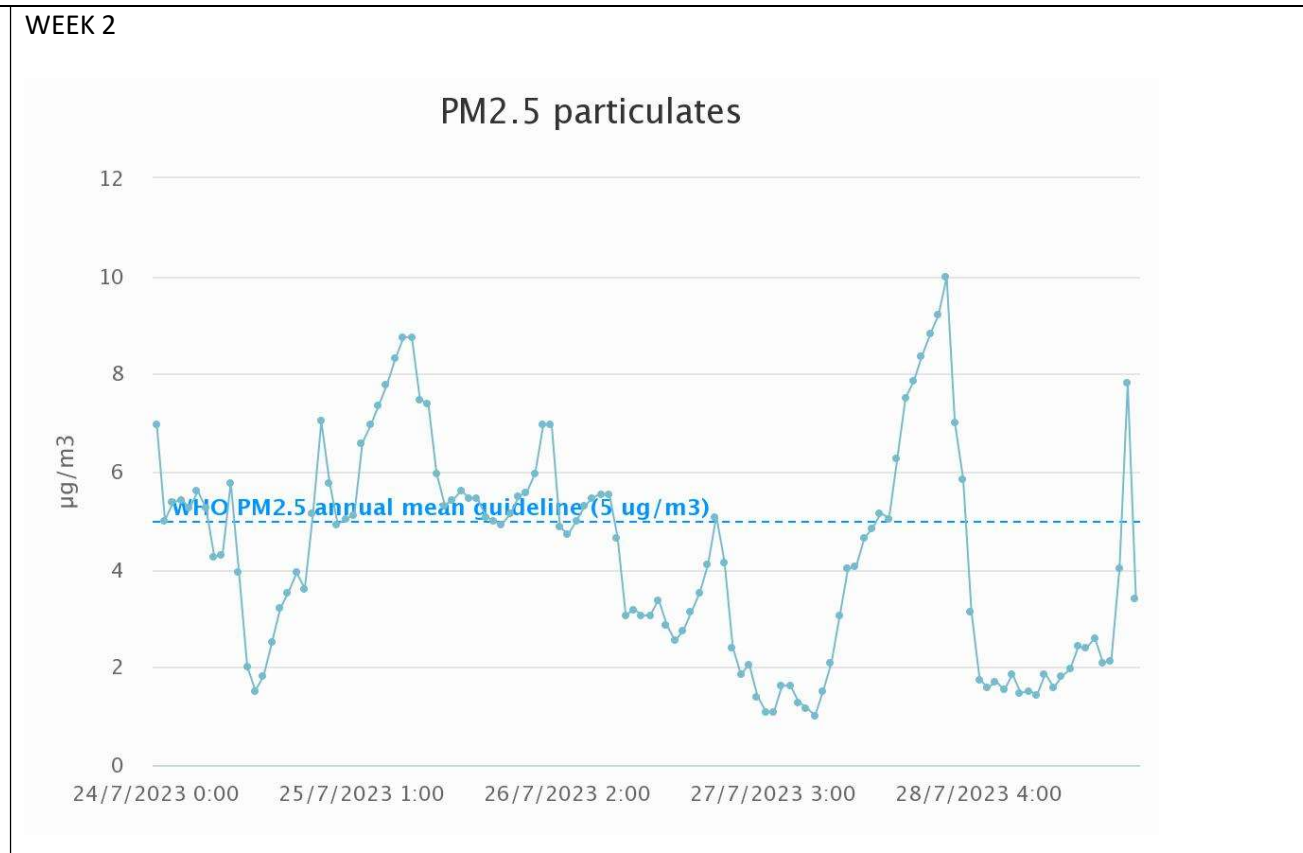
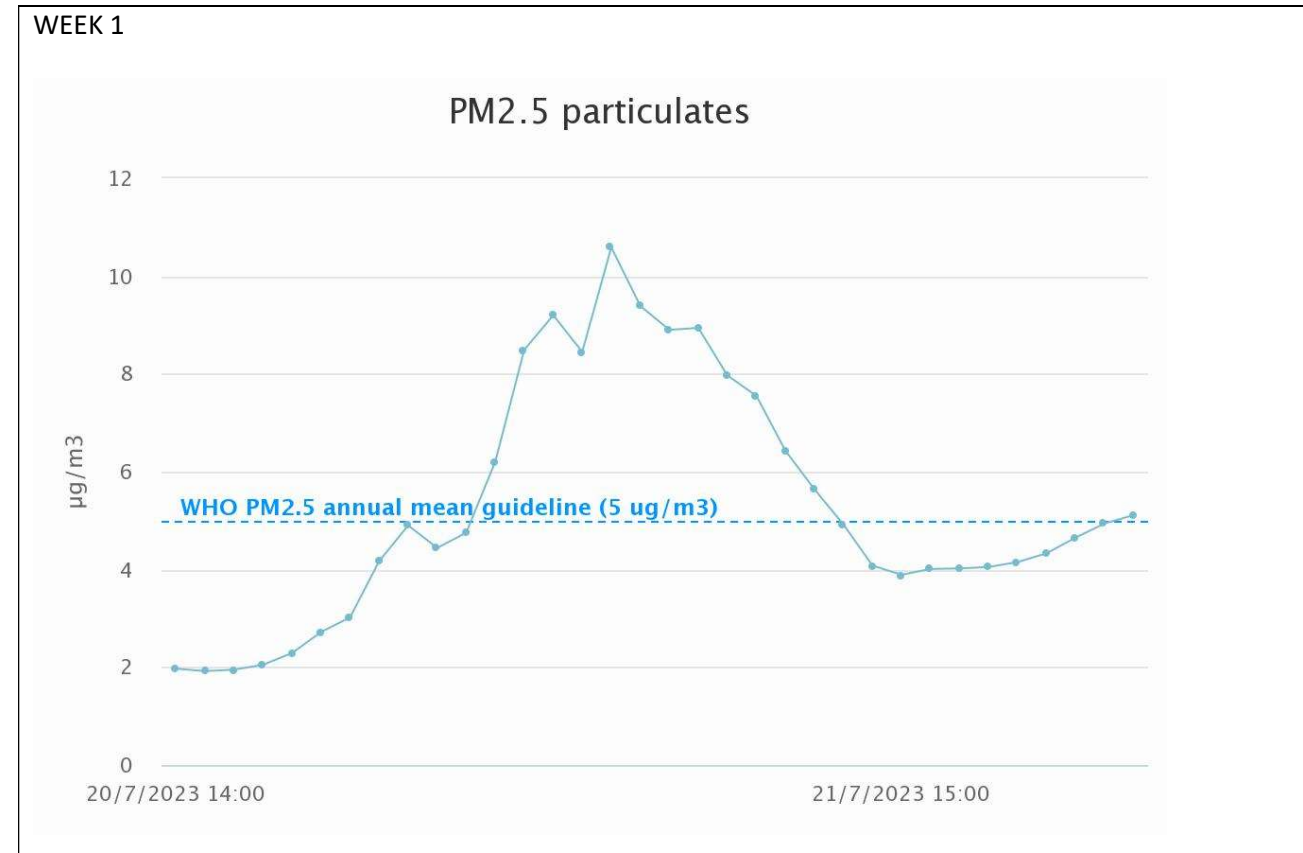
Sample week 2; School holidays; Monday 24 July to Friday 28 July 2023



St Thomas Becket Catholic Primary School (Dickenson's Lane)

Sample week 1; School term time; Monday 17 to Friday 21 July 2023. NB: only 2 days of data recorded due to issue with sensor functionality

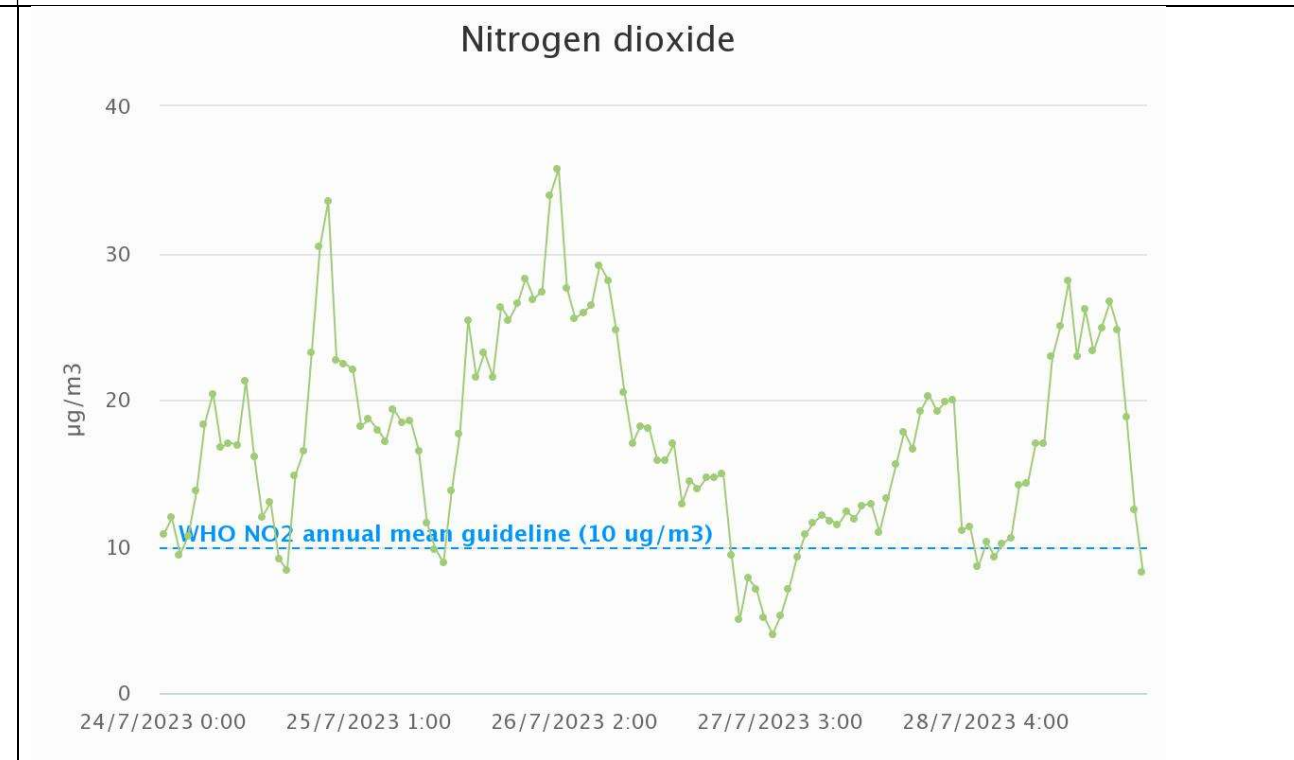
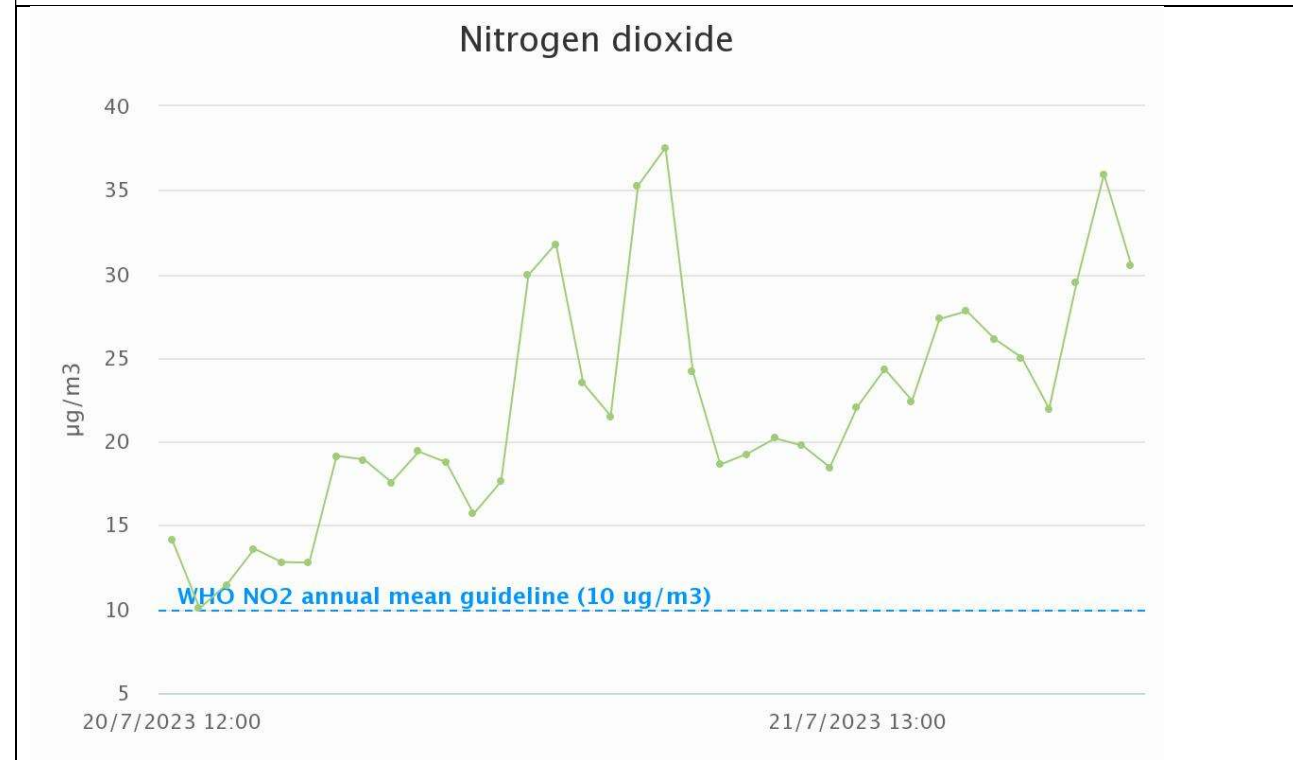
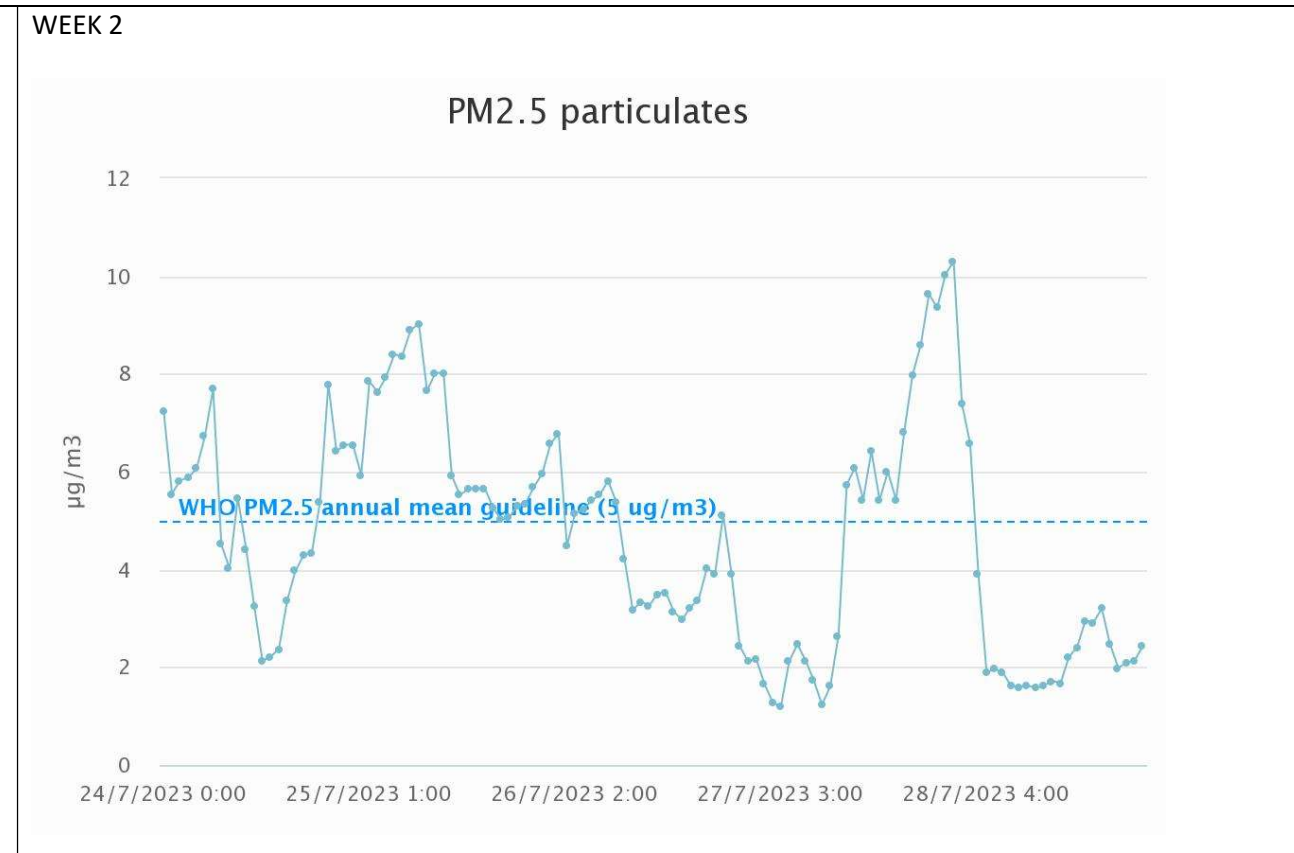
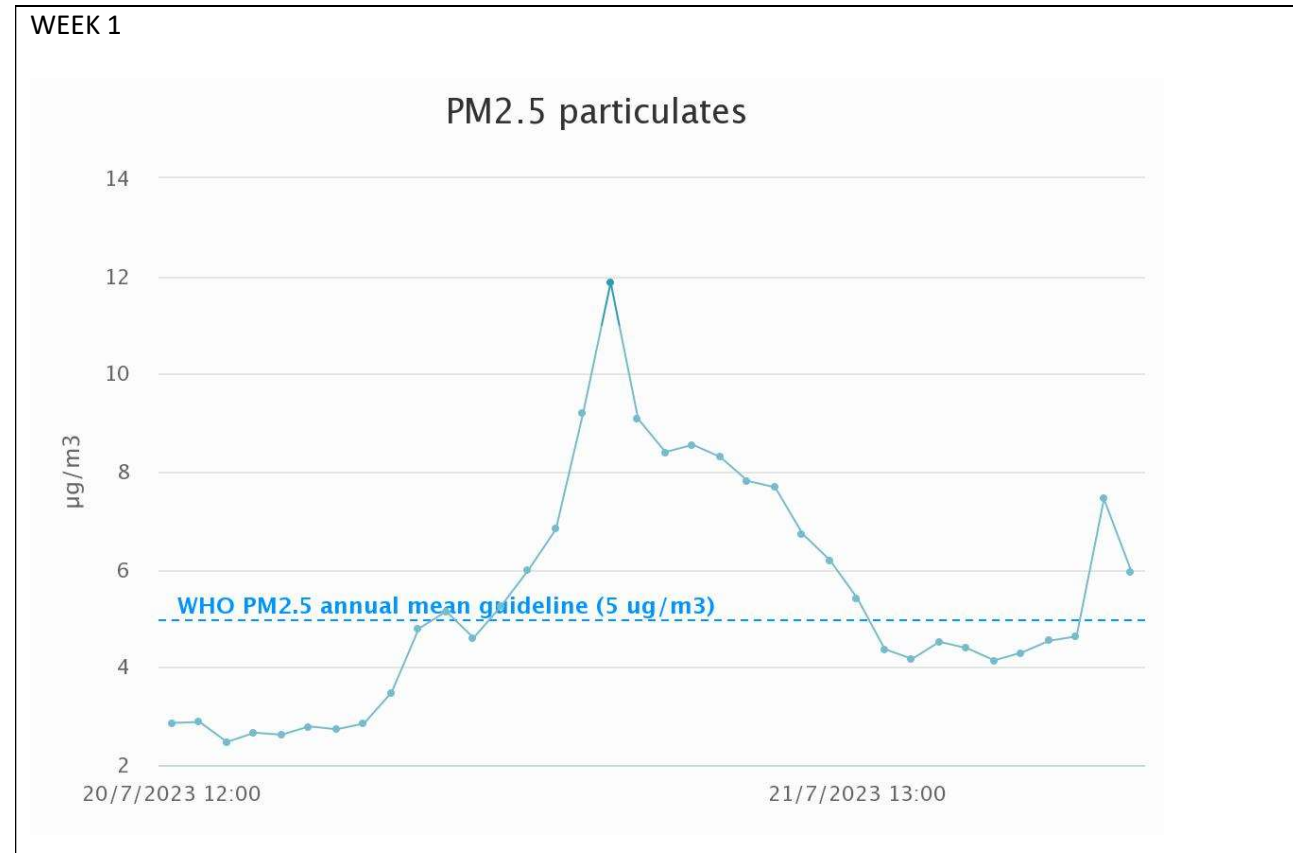
Sample week 2; School holidays; Monday 24 July to Friday 28 July 2023



Harris Primary Academy Haling Park (Haling Road)

Sample week 1; School term time; Monday 17 to Friday 21 July 2023. NB: only 2 days of data recorded due to issue with sensor functionality

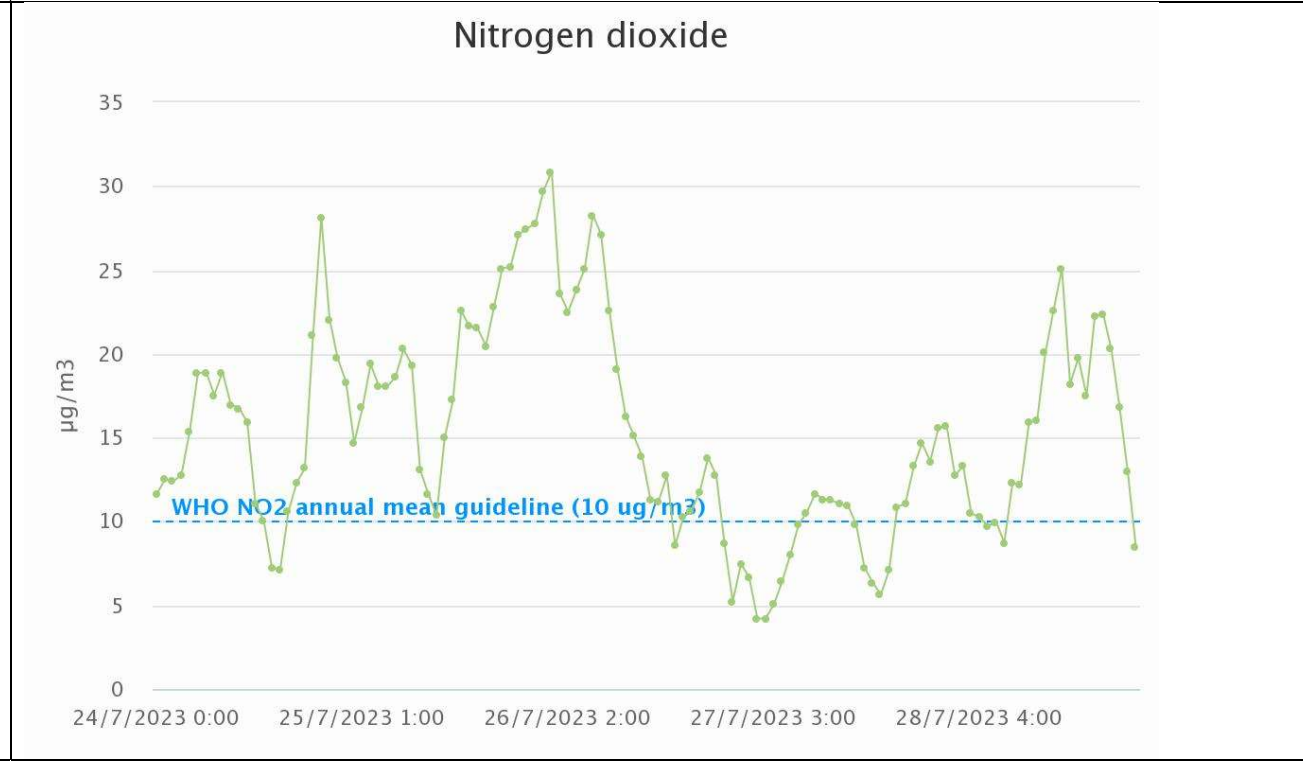
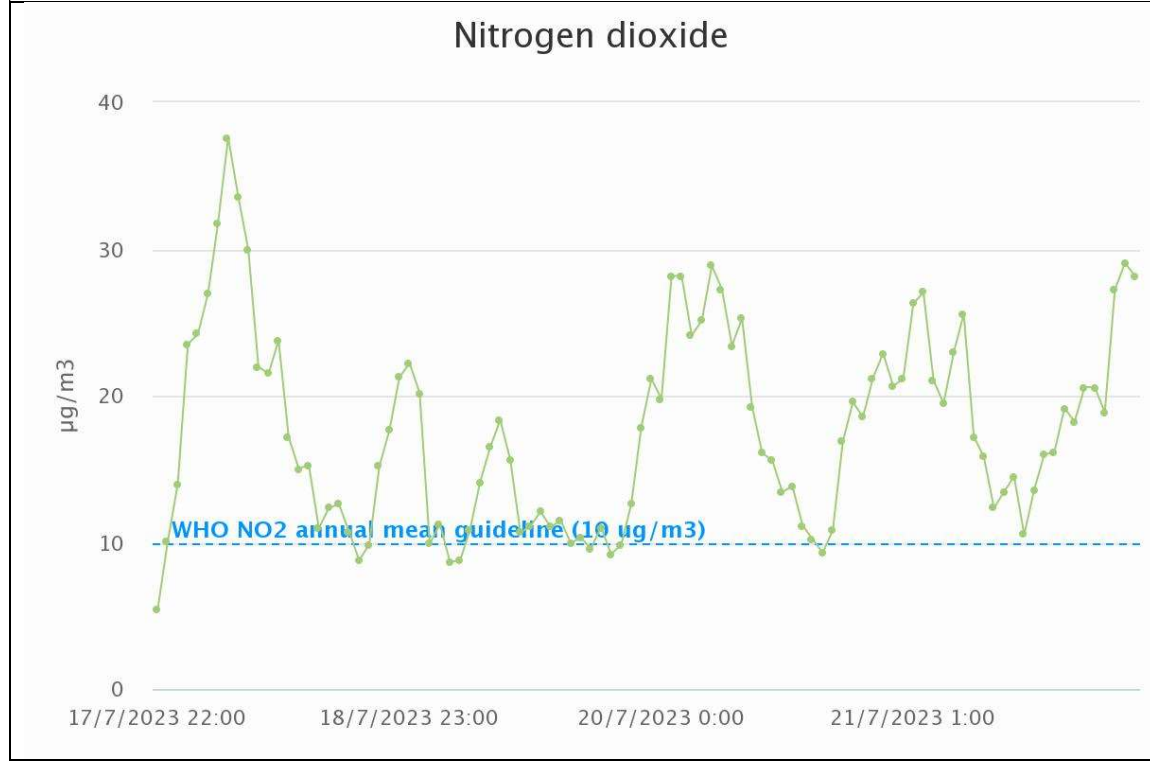
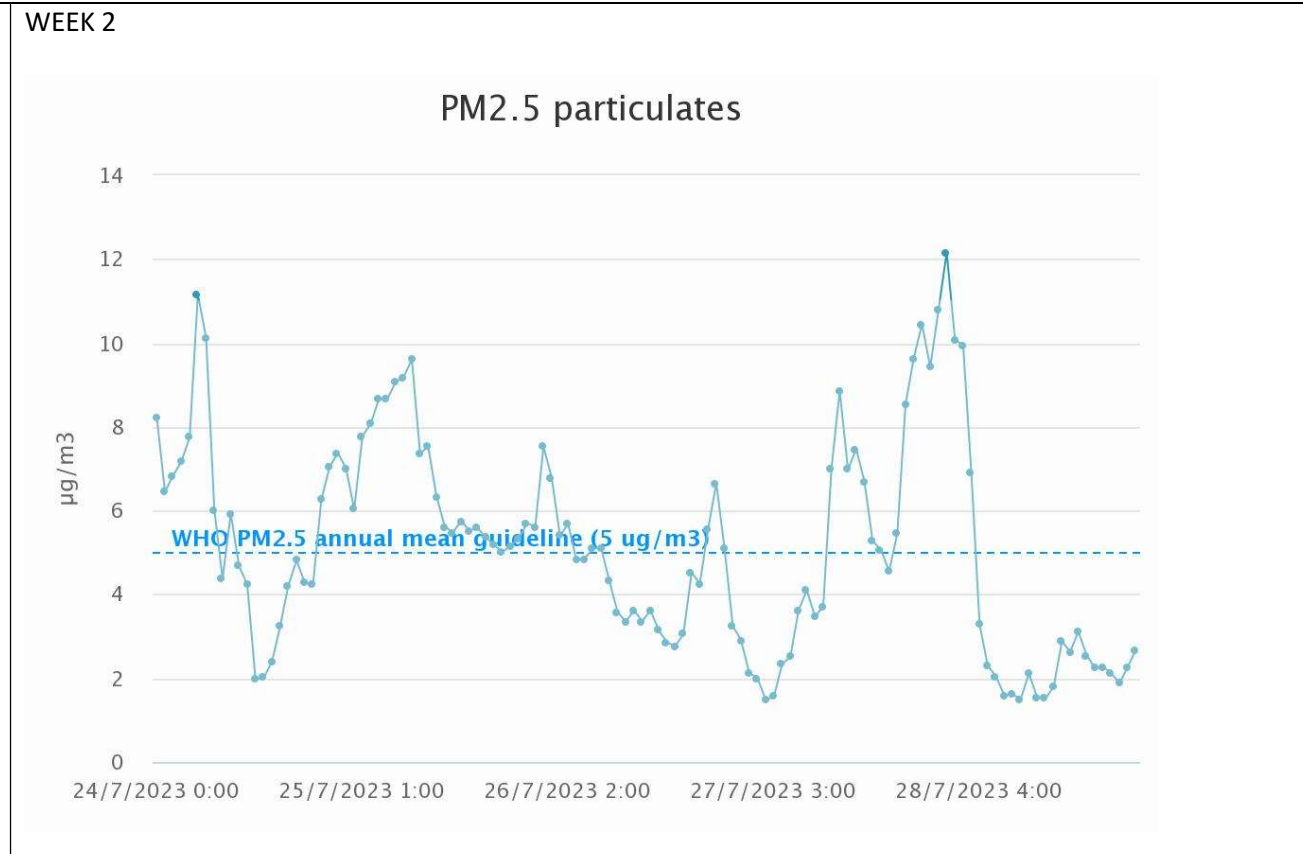
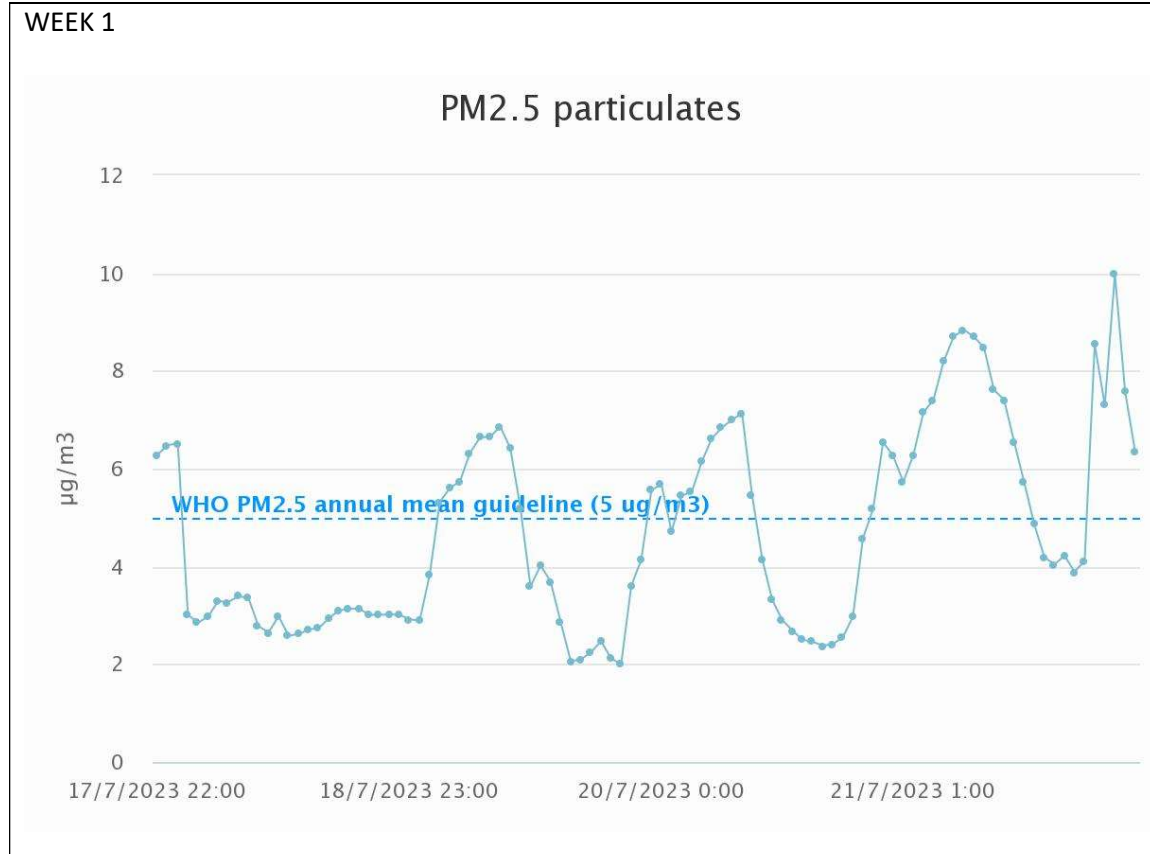
Sample week 2; School holidays; Monday 24 July to Friday 28 July 2023



Keston Primary School (Keston Avenue)

Sample week 1; School term time; Monday 17 to Friday 21 July 2023.

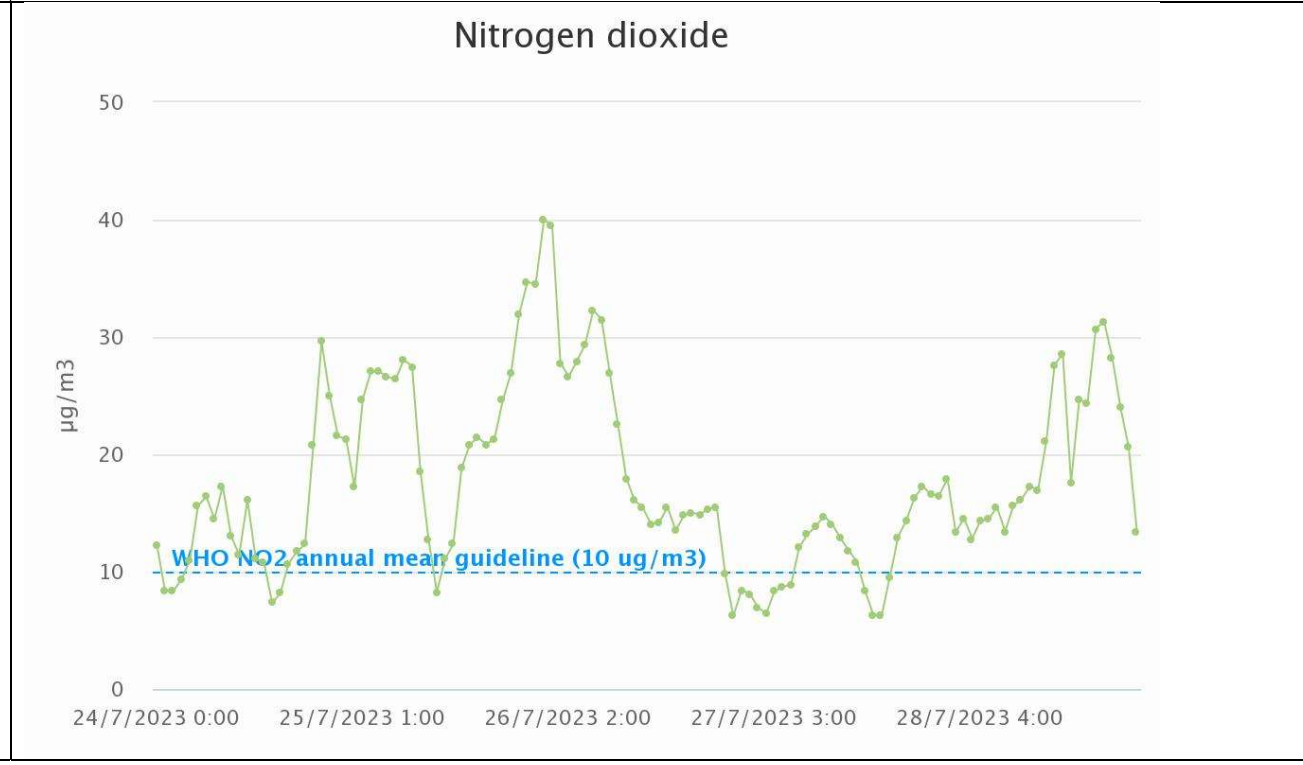
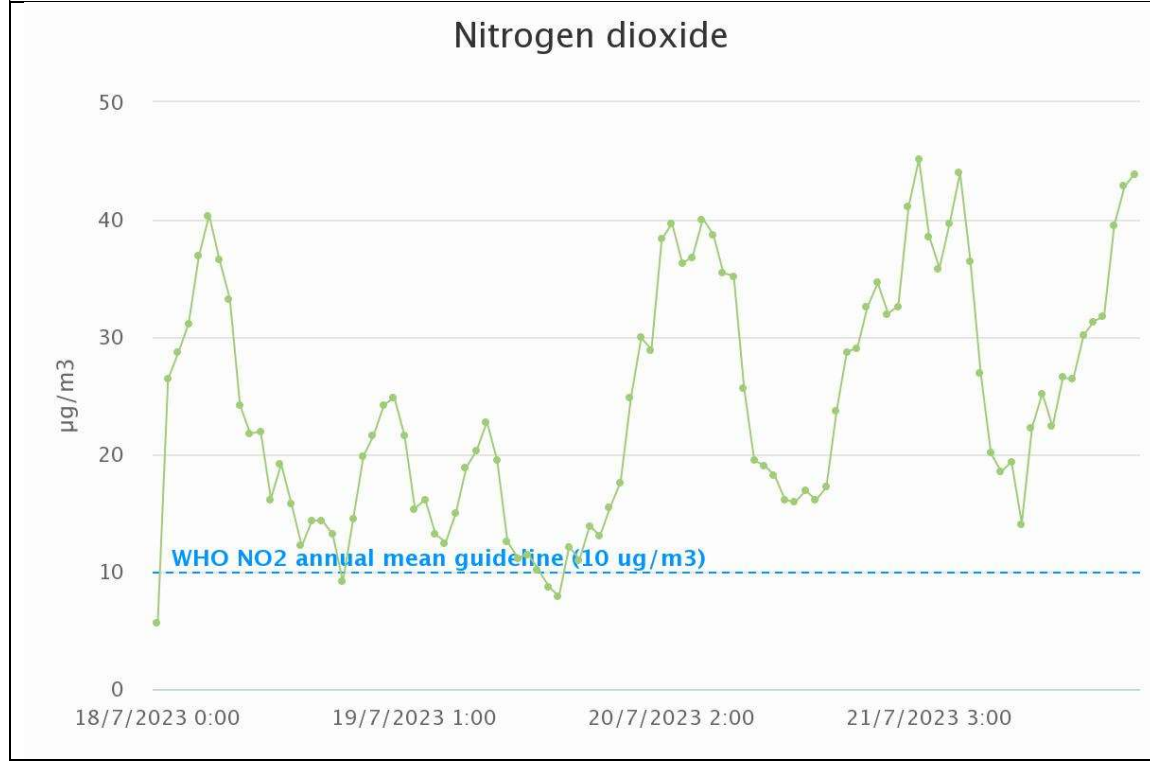
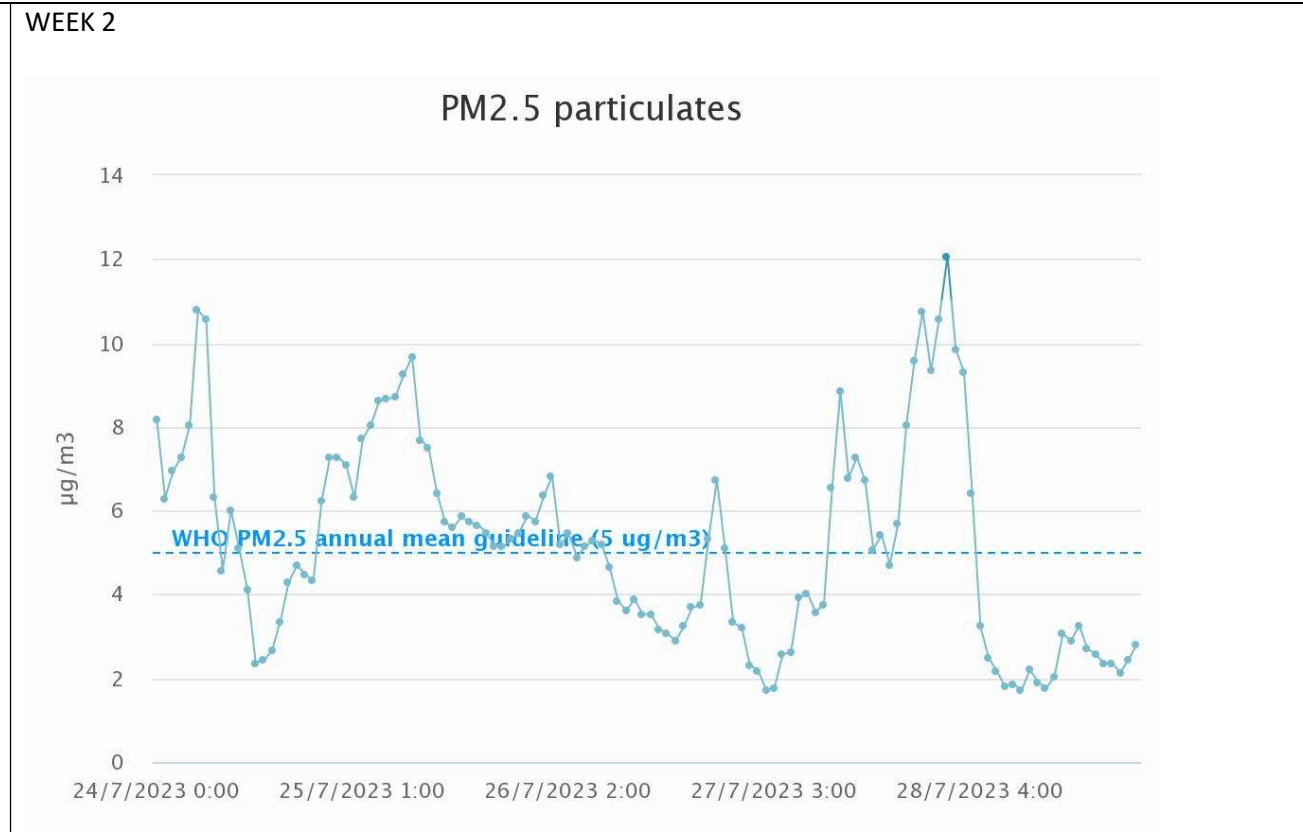
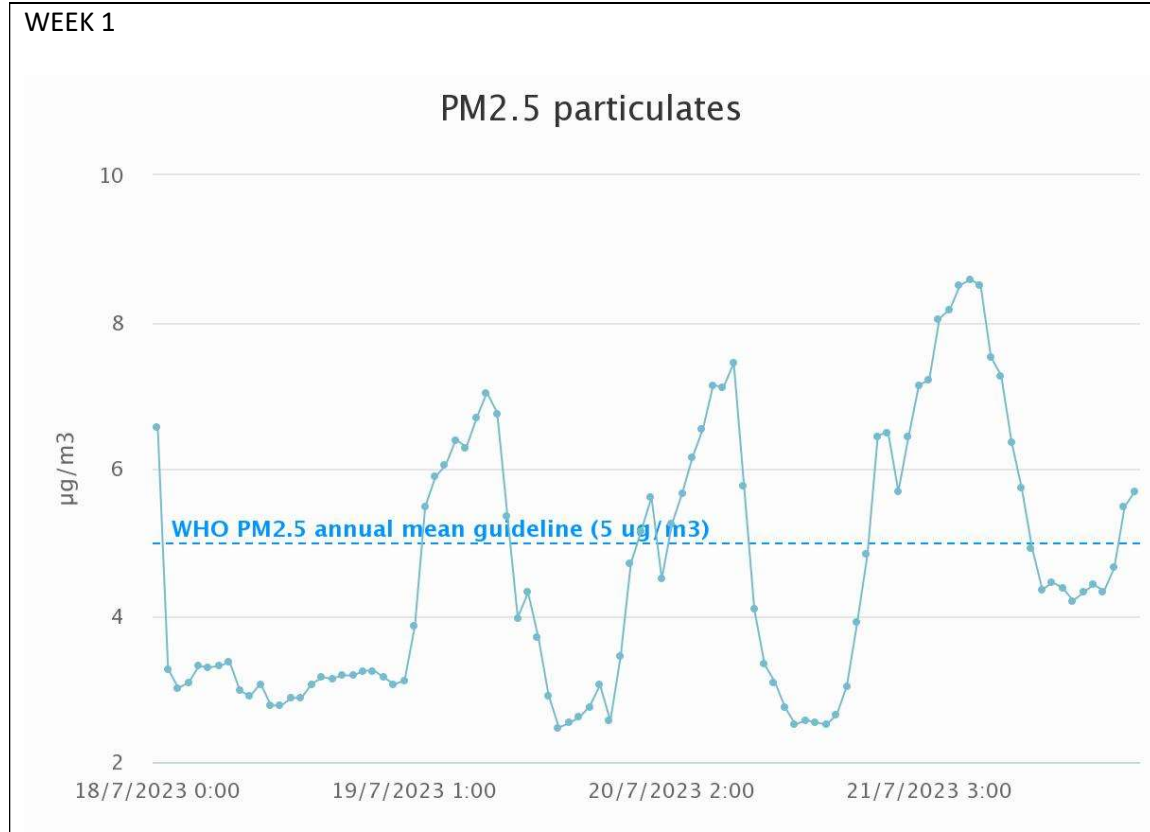
Sample week 2; School holidays; Monday 24 July to Friday 28 July 2023



Keston Primary School (Court Avenue)

Sample week 1; School term time; Monday 17 to Friday 21 July 2023.

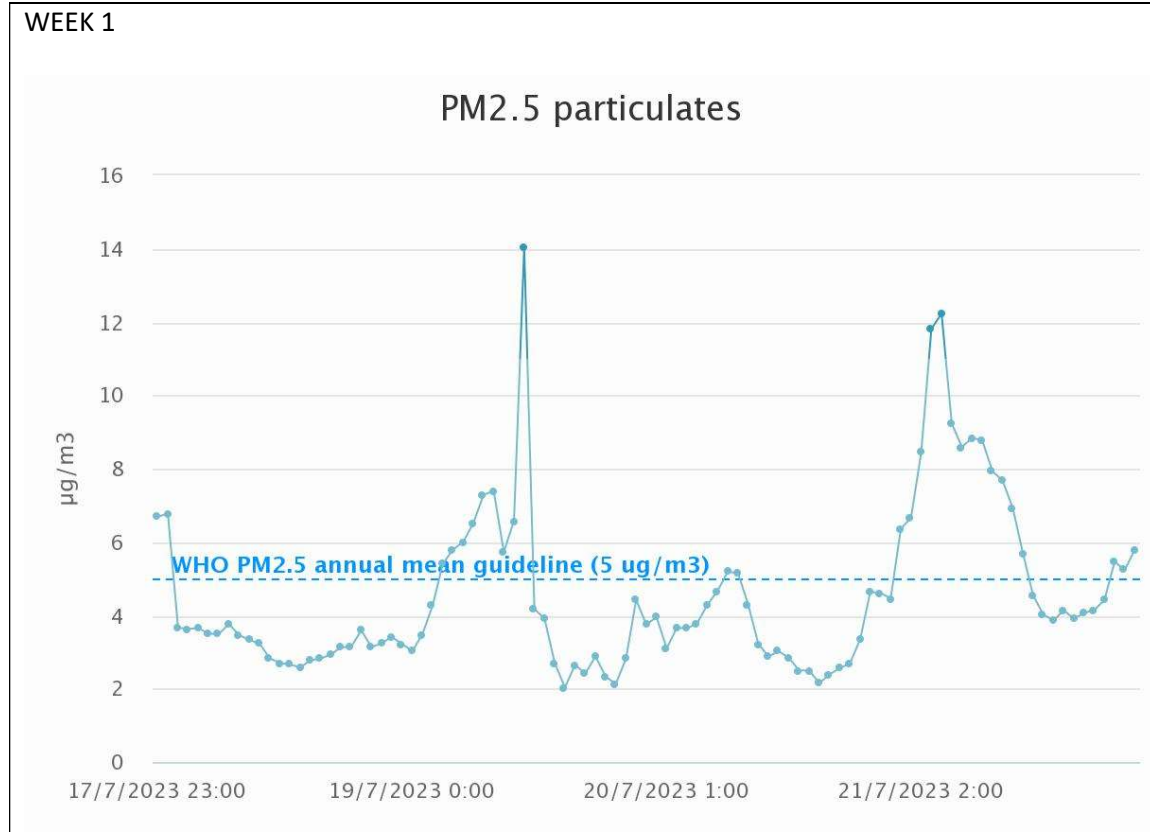
Sample week 2; School holidays; Monday 24 July to Friday 28 July 2023



Downsview Primary School (Marston Way)

Sample week 1; School term time; Monday 17 to Friday 21 July 2023.

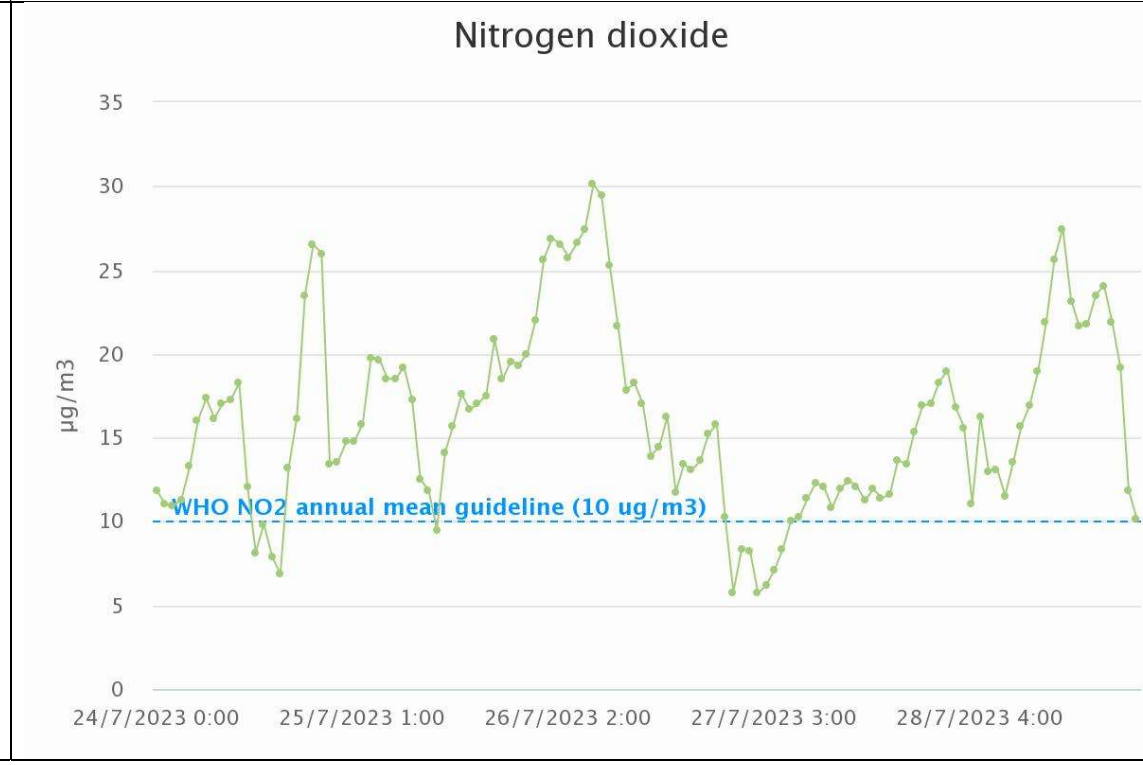
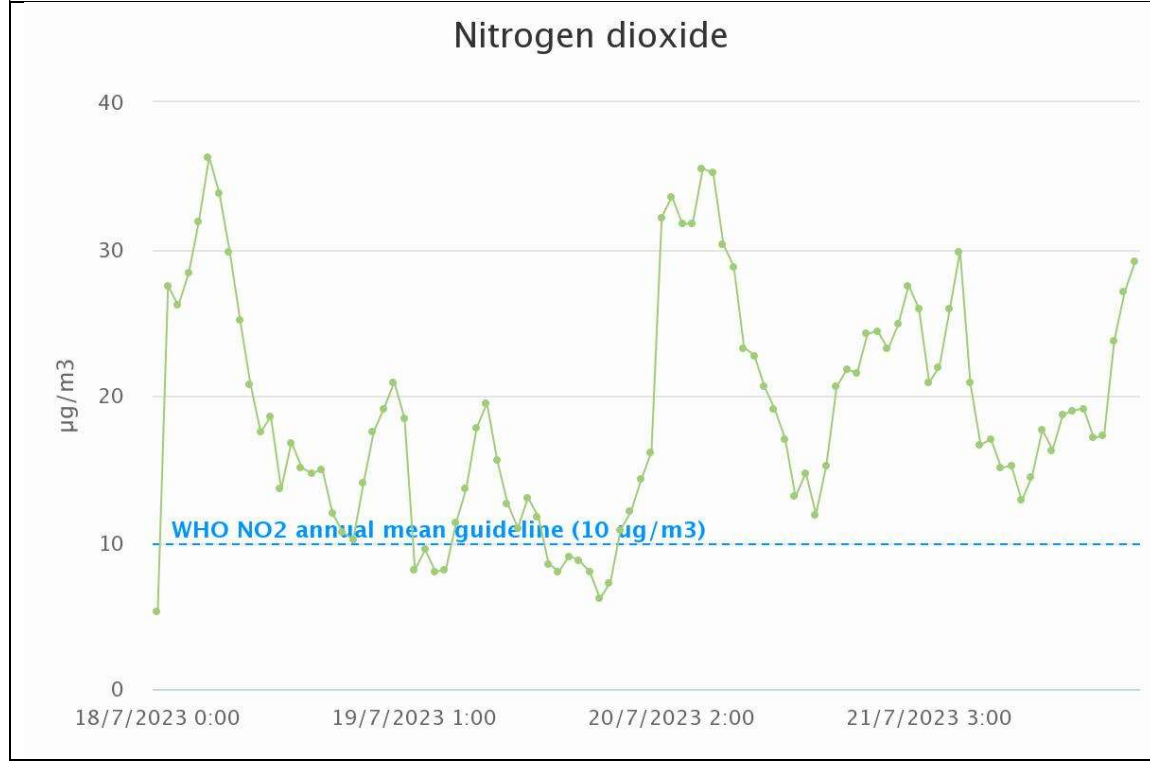
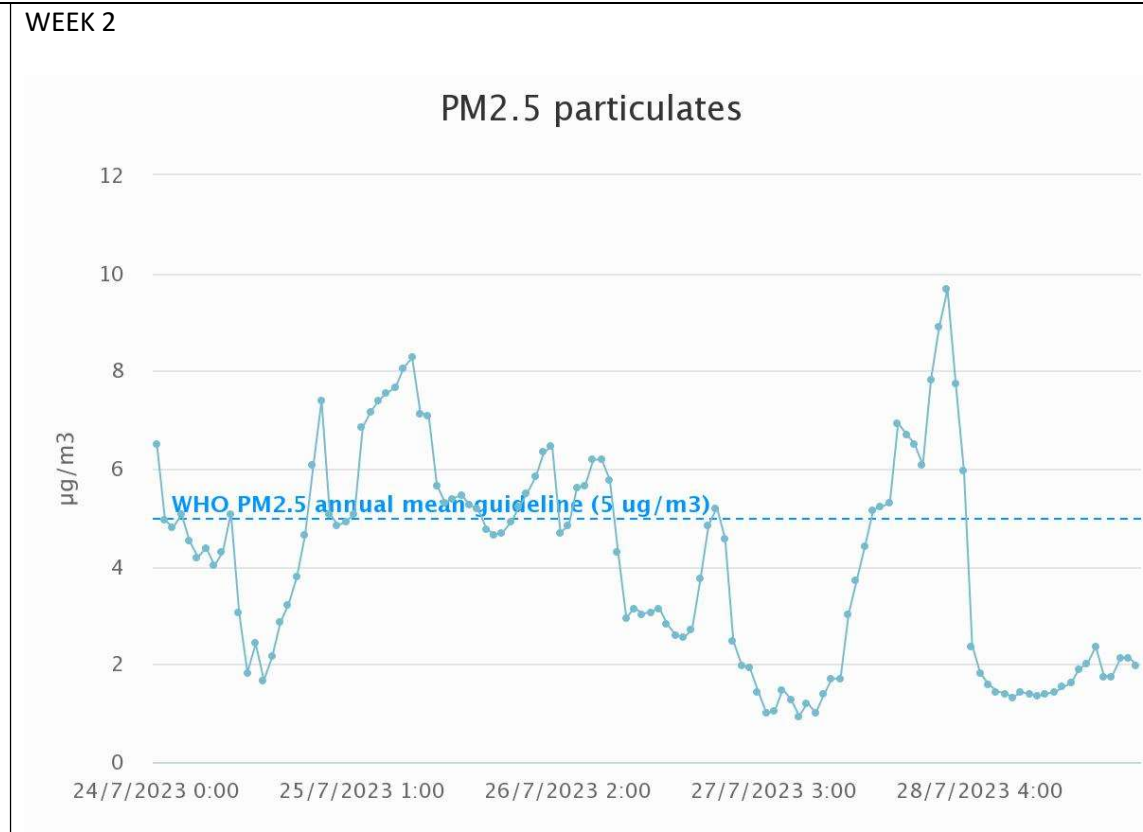
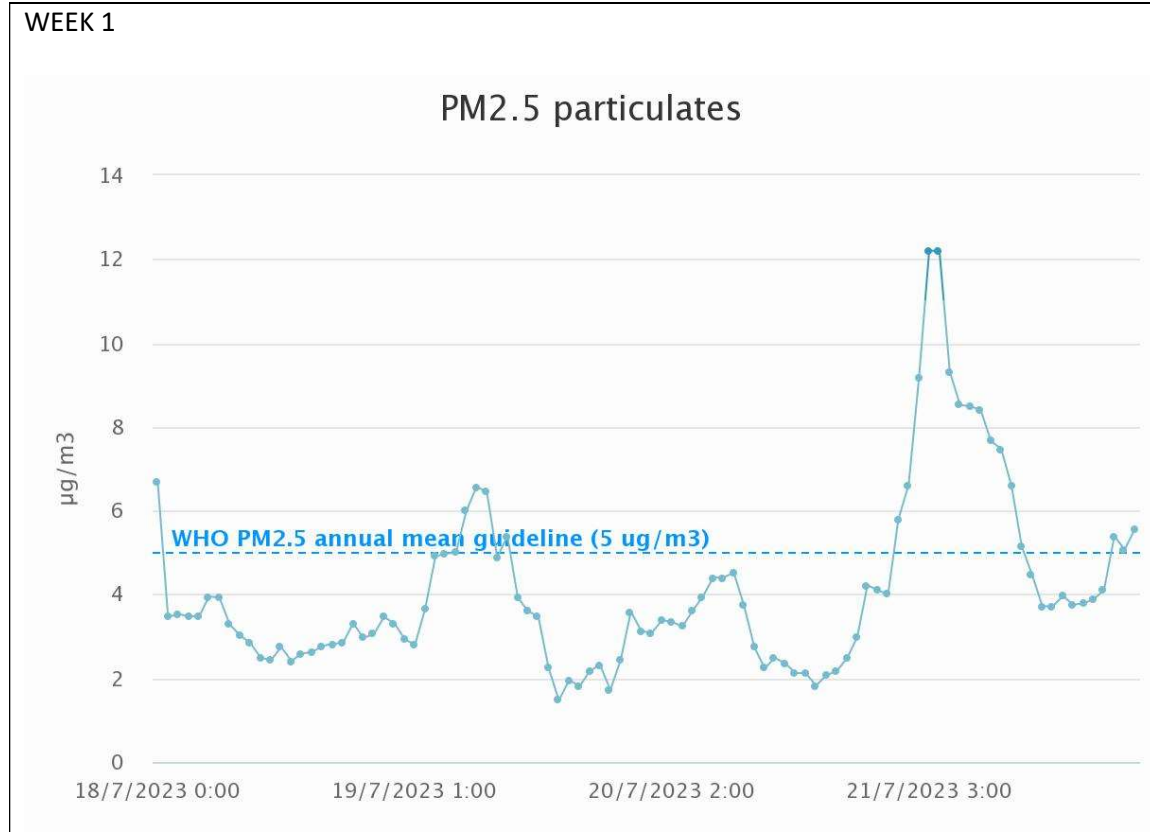
Sample week 2; School holidays; Monday 24 July to Friday 28 July 2023



Downsview Primary School (Biggin Way)

Sample week 1; School term time; Monday 17 to Friday 21 July 2023.

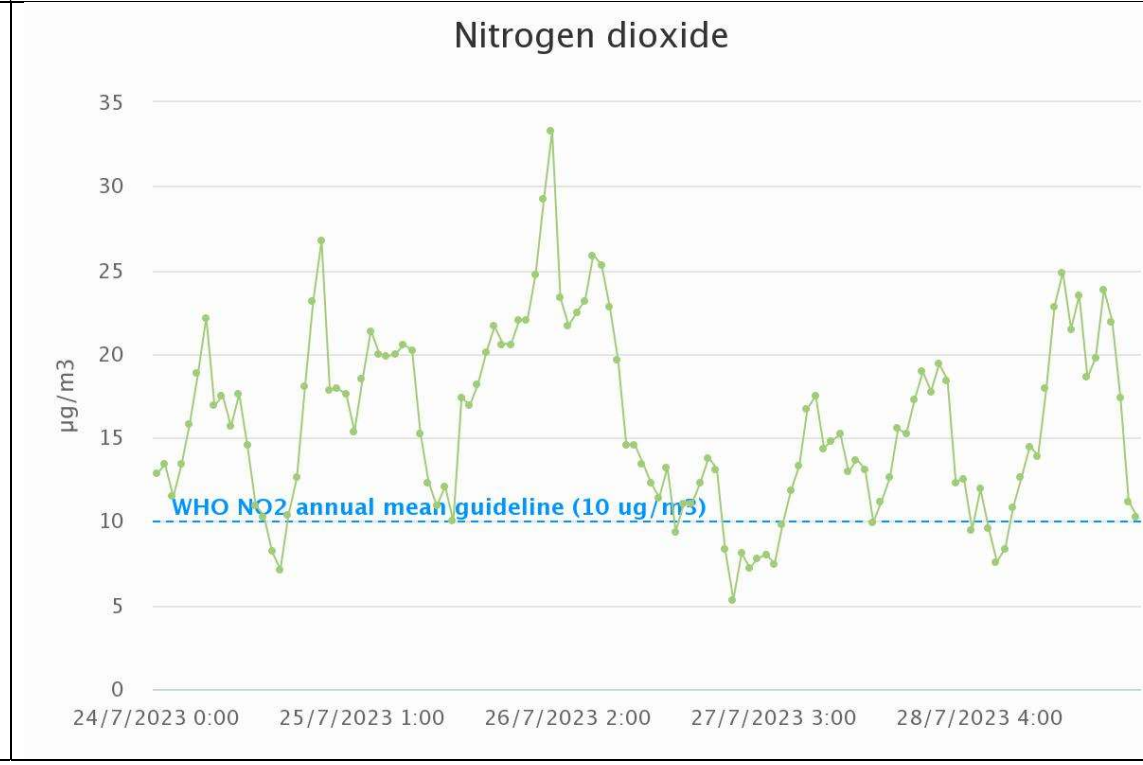
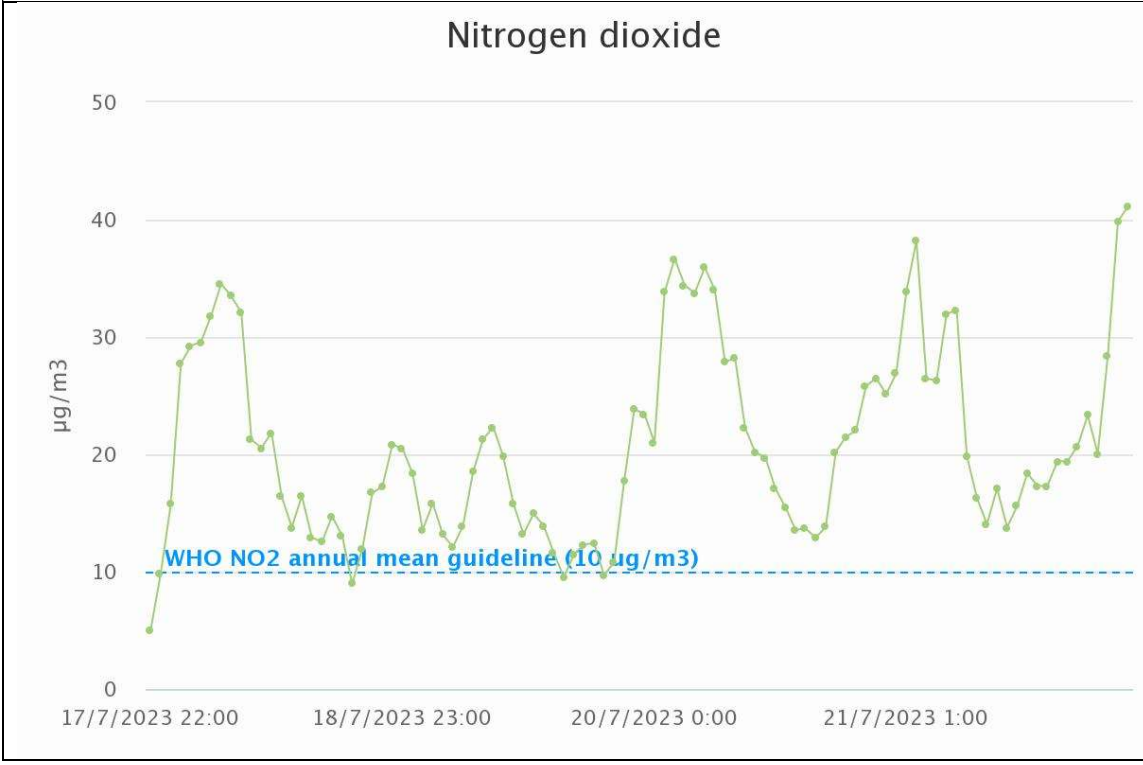
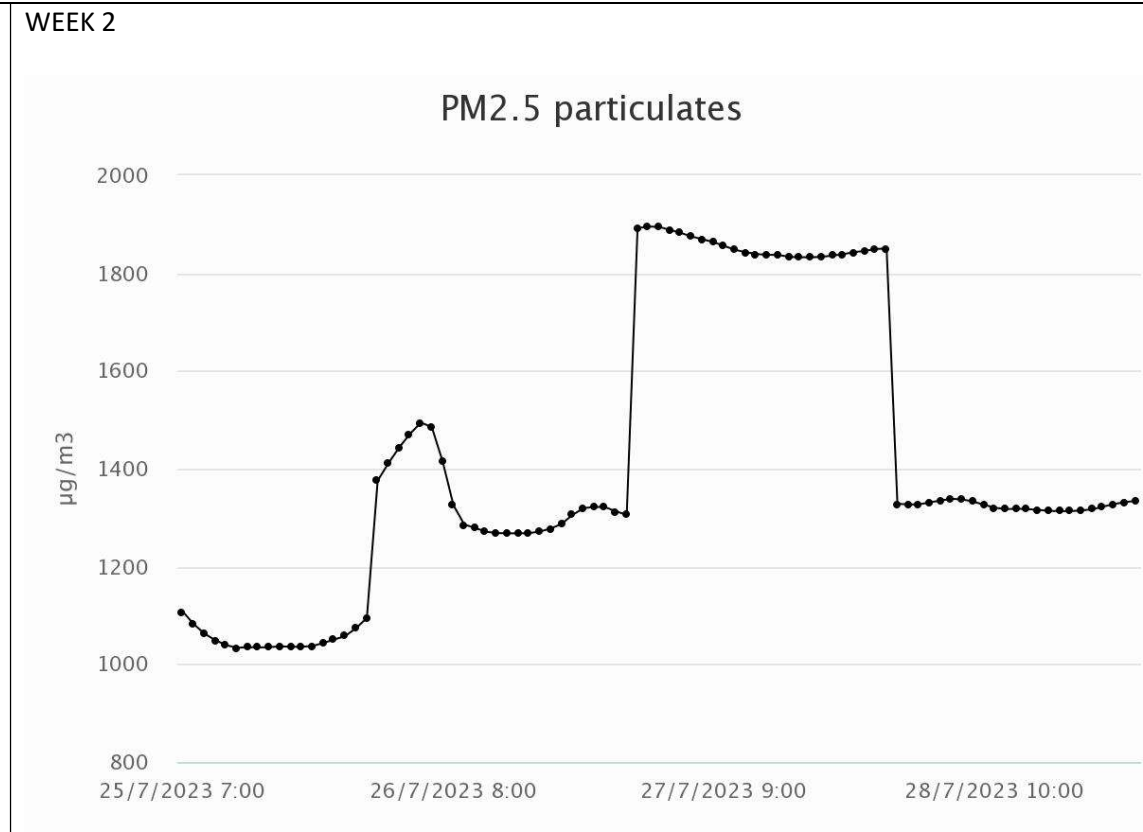
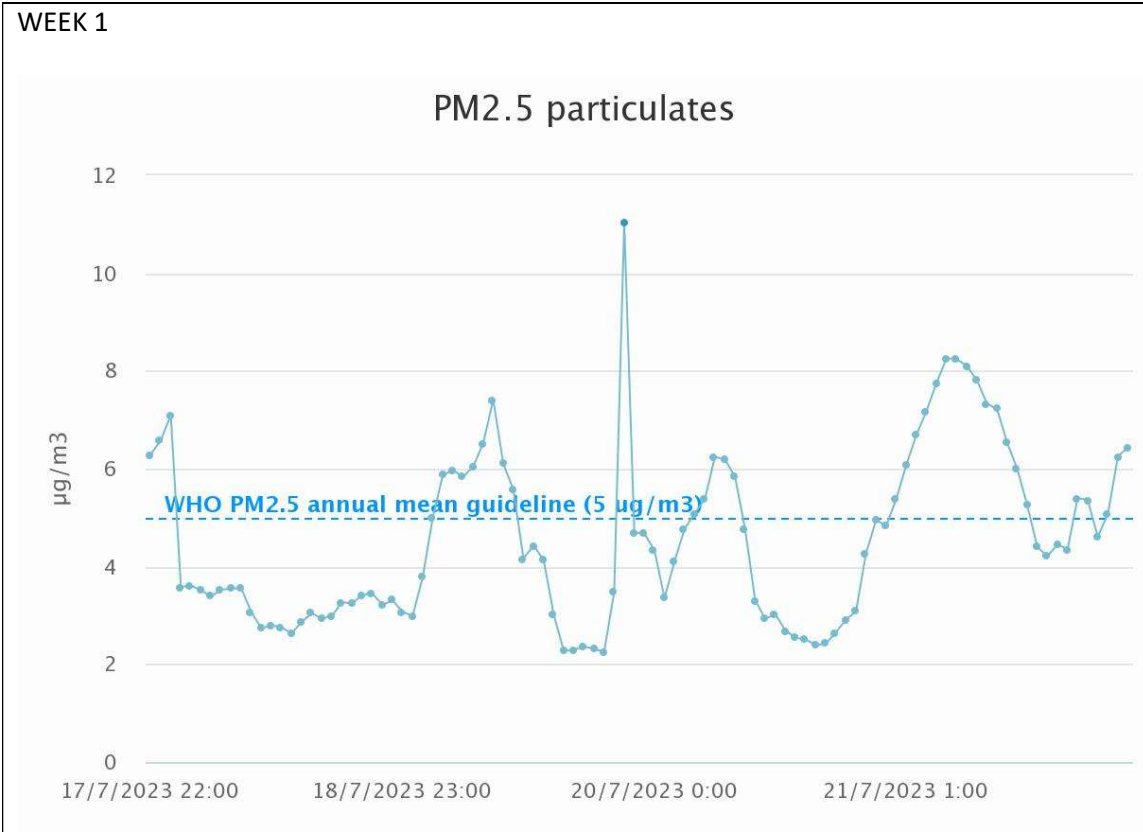
Sample week 2; School holidays; Monday 24 July to Friday 28 July 2023



Christ Church CoE Primary School (Montpelier Road)

Sample week 1; School term time; Monday 17 to Friday 21 July 2023.

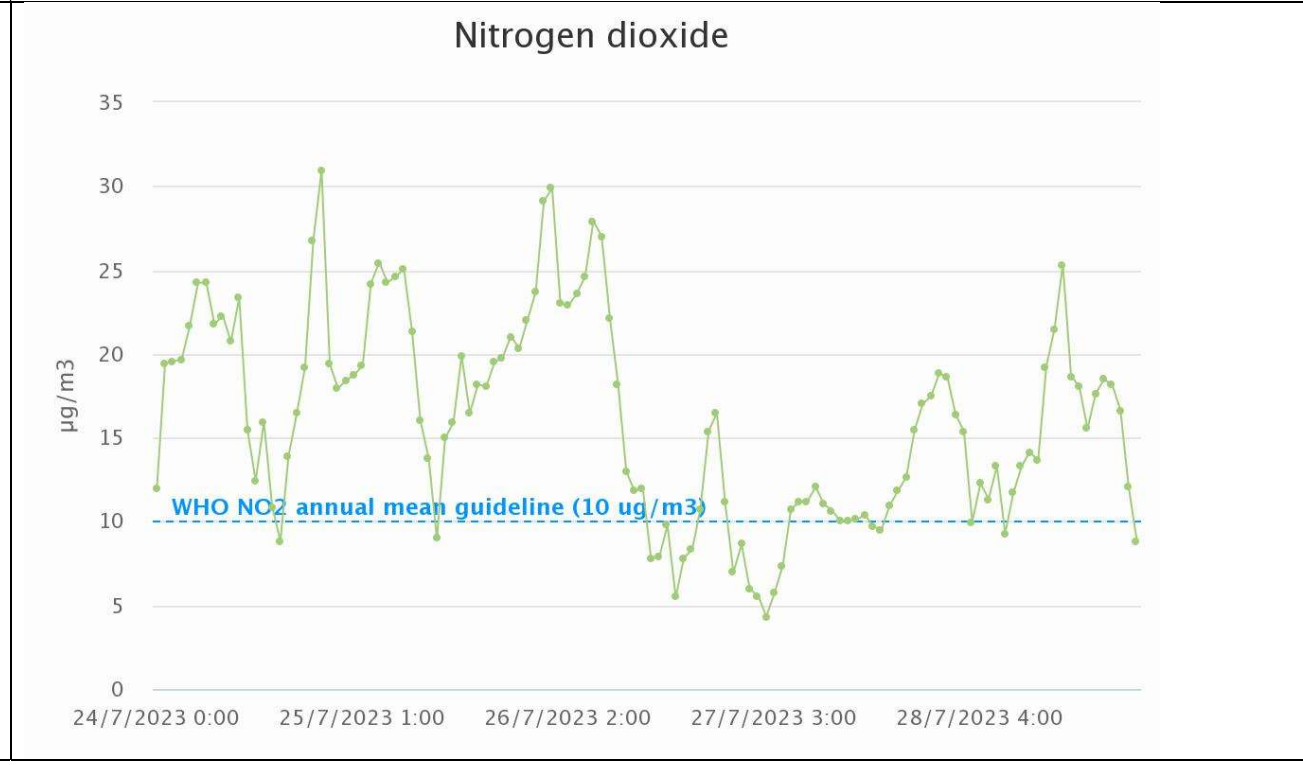
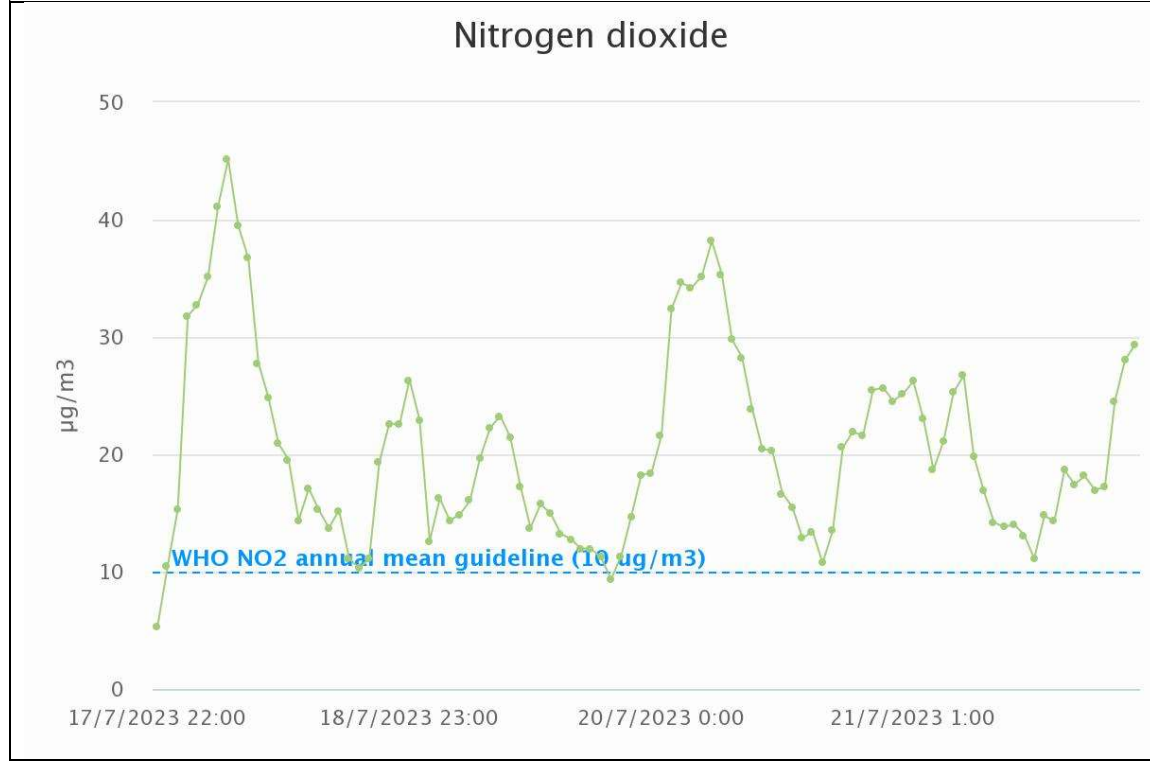
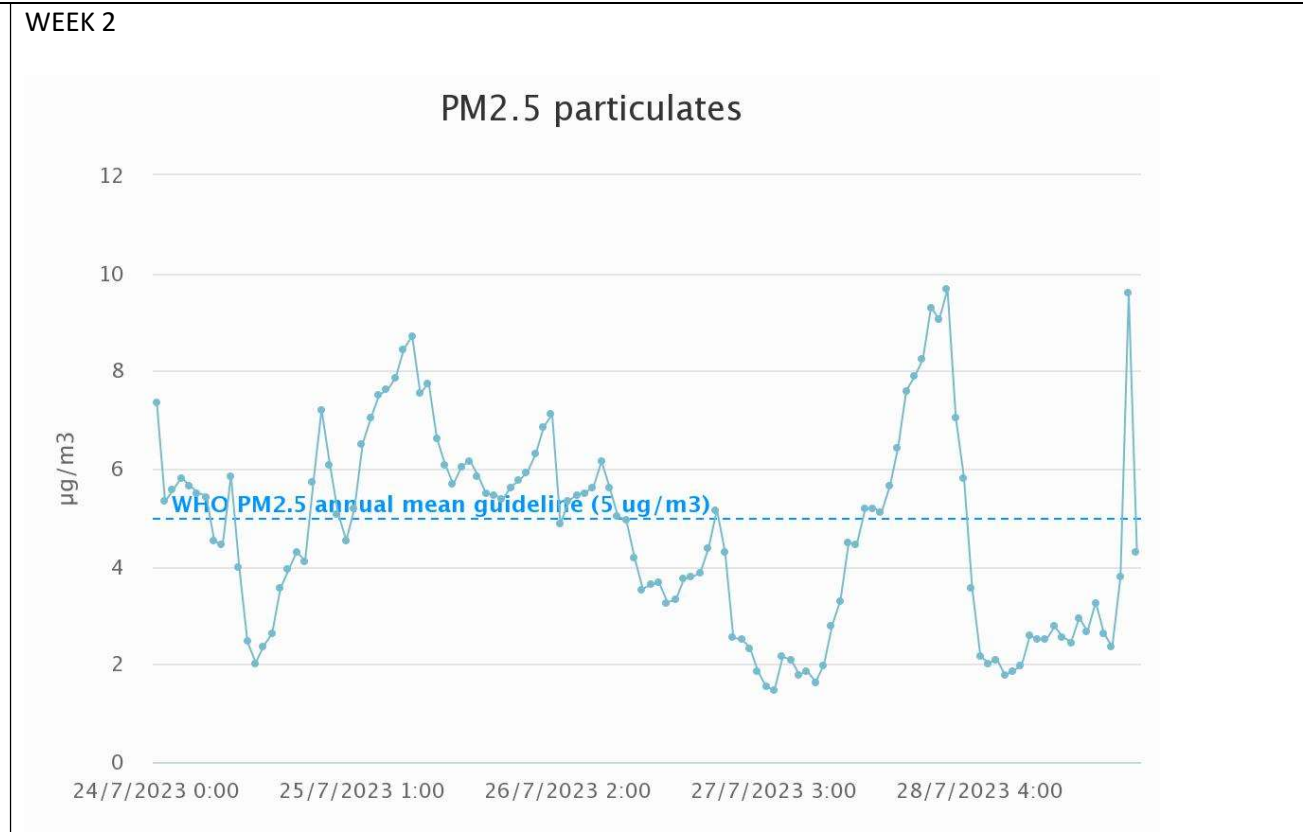
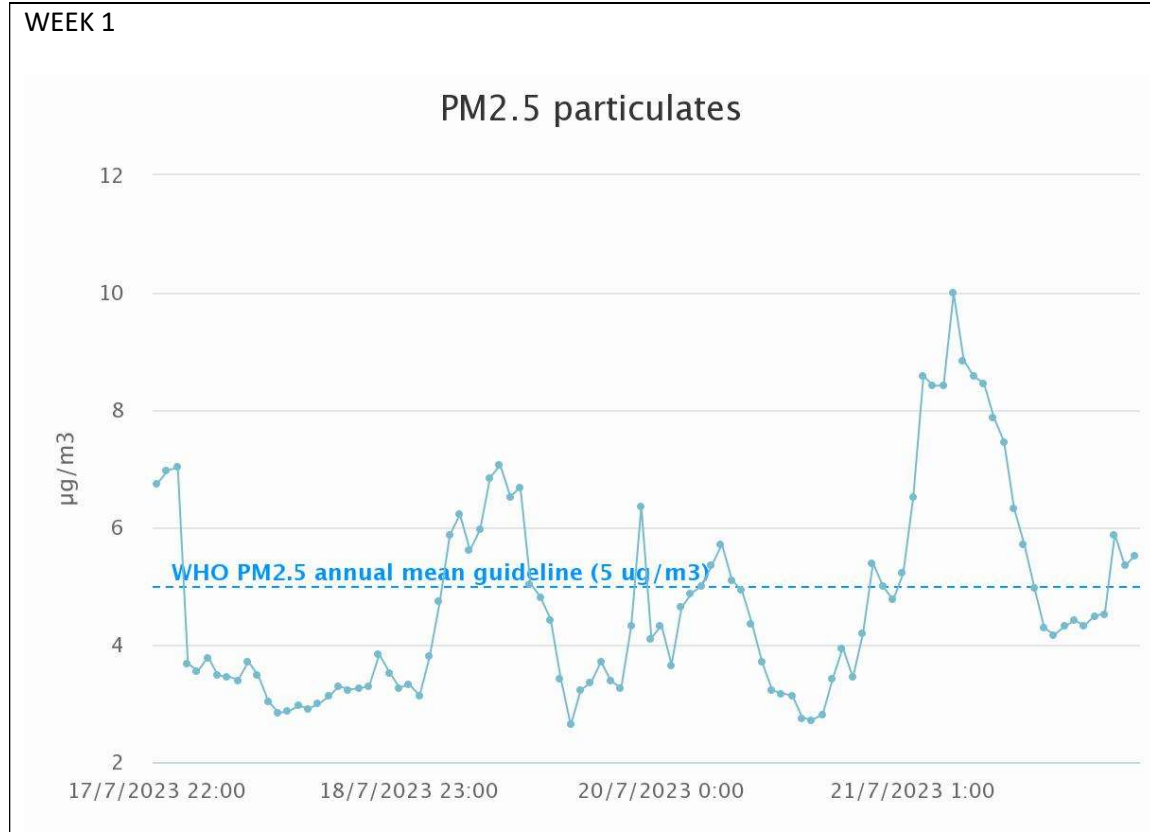
Sample week 2; School holidays; Monday 24 July to Friday 28 July 2023



Oasis Academy Reylands (Oakley Road)

Sample week 1; School term time; Monday 17 to Friday 21 July 2023.

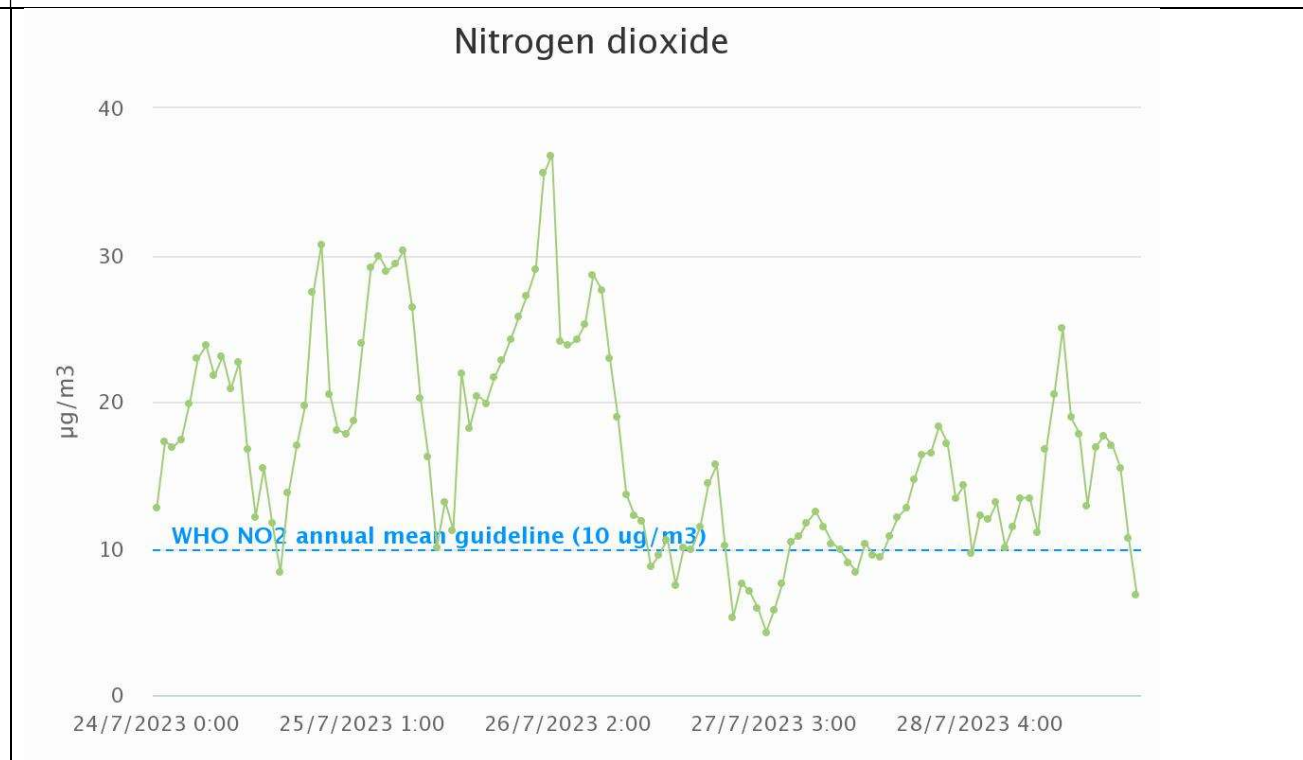
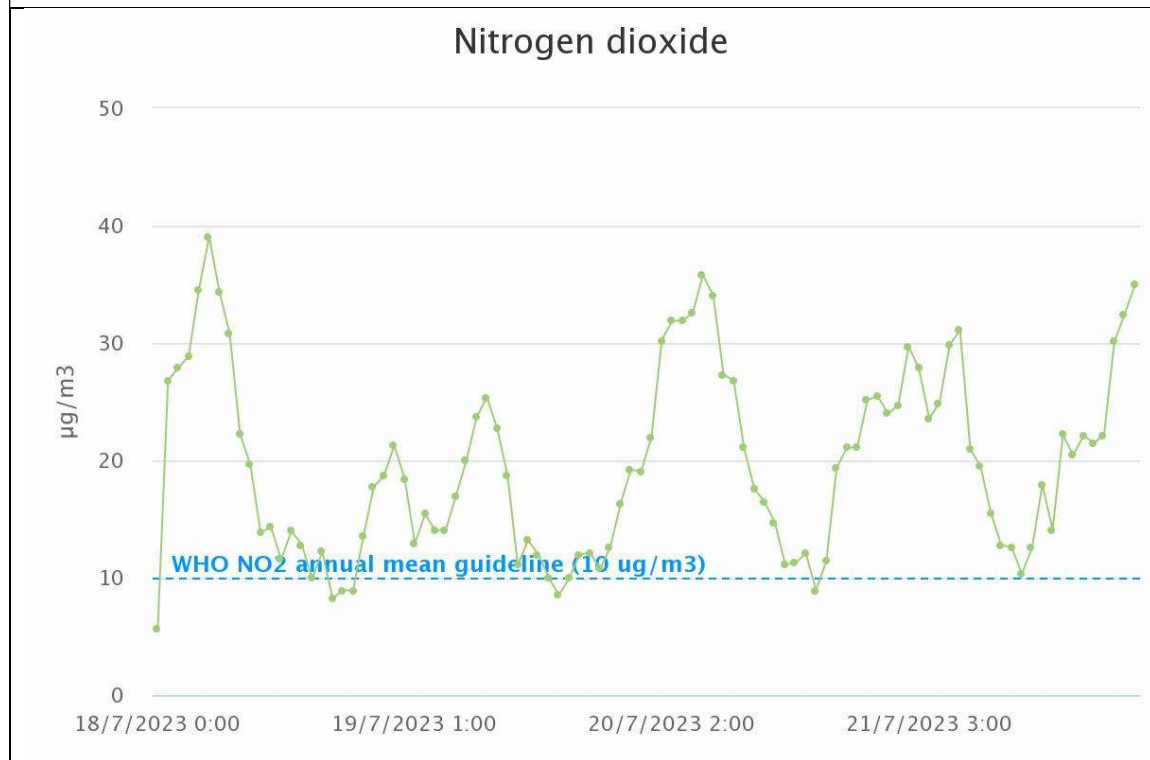
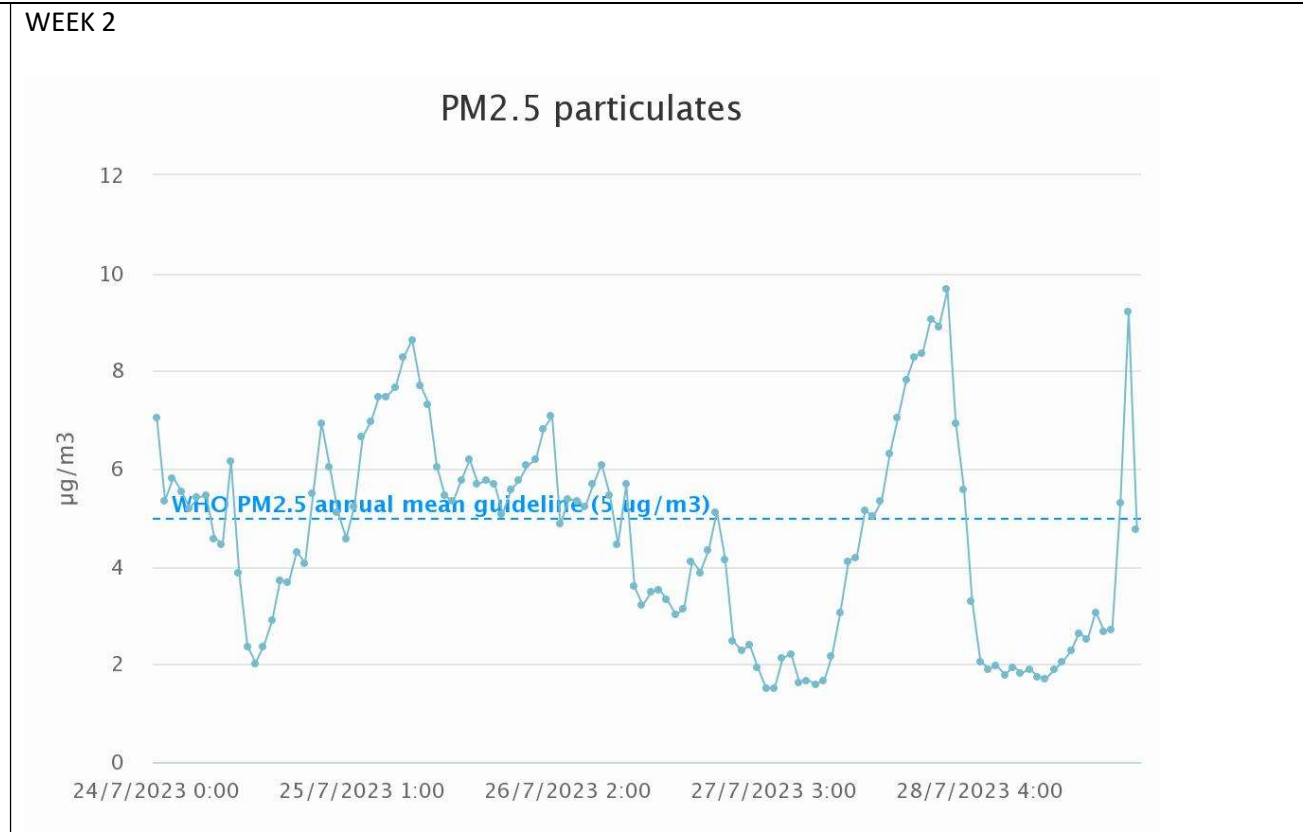
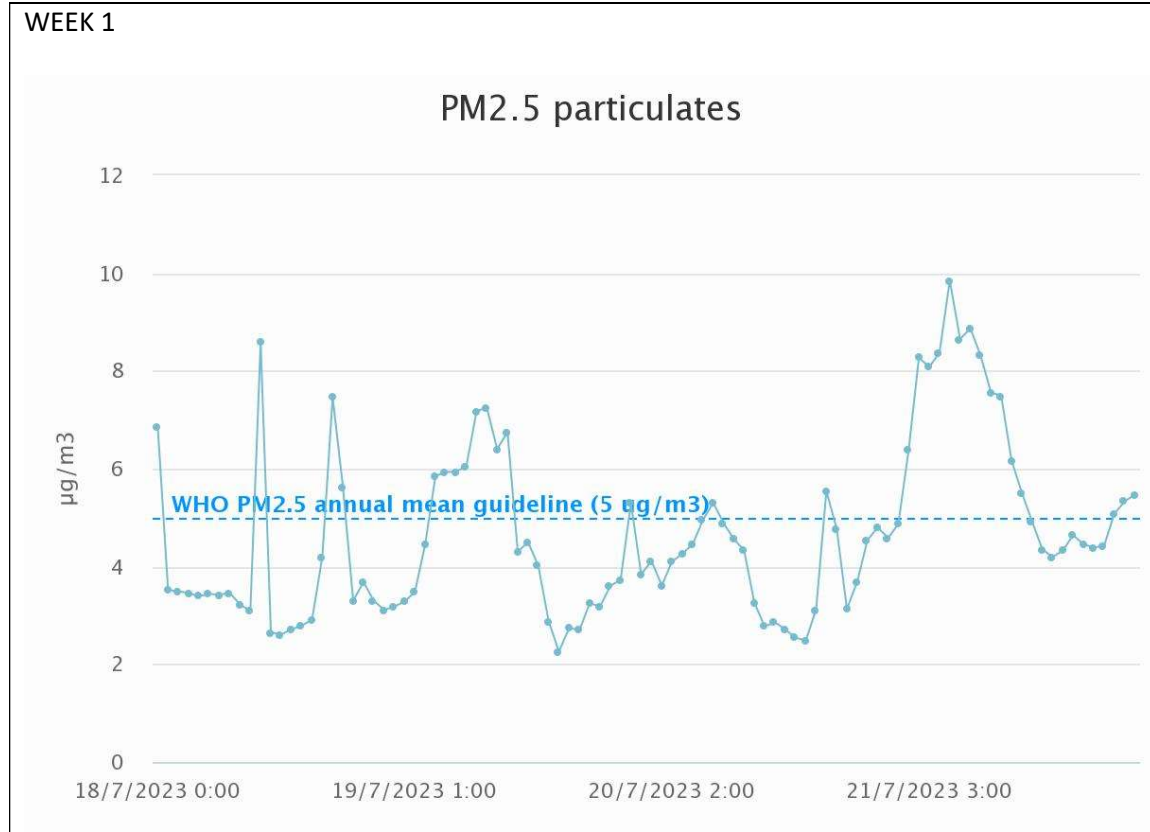
Sample week 2; School holidays; Monday 24 July to Friday 28 July 2023



Oasis Academy Reylands (Sandown Road)

Sample week 1; School term time; Monday 17 to Friday 21 July 2023.

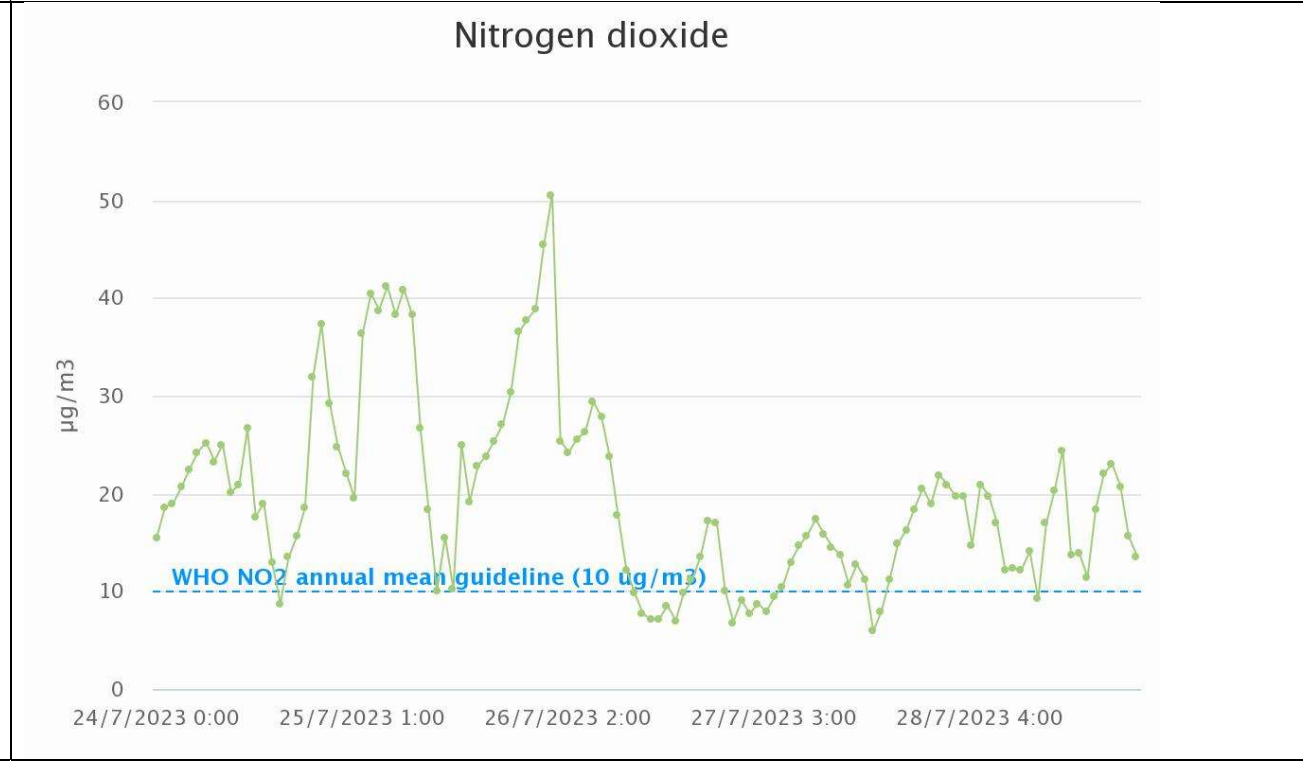
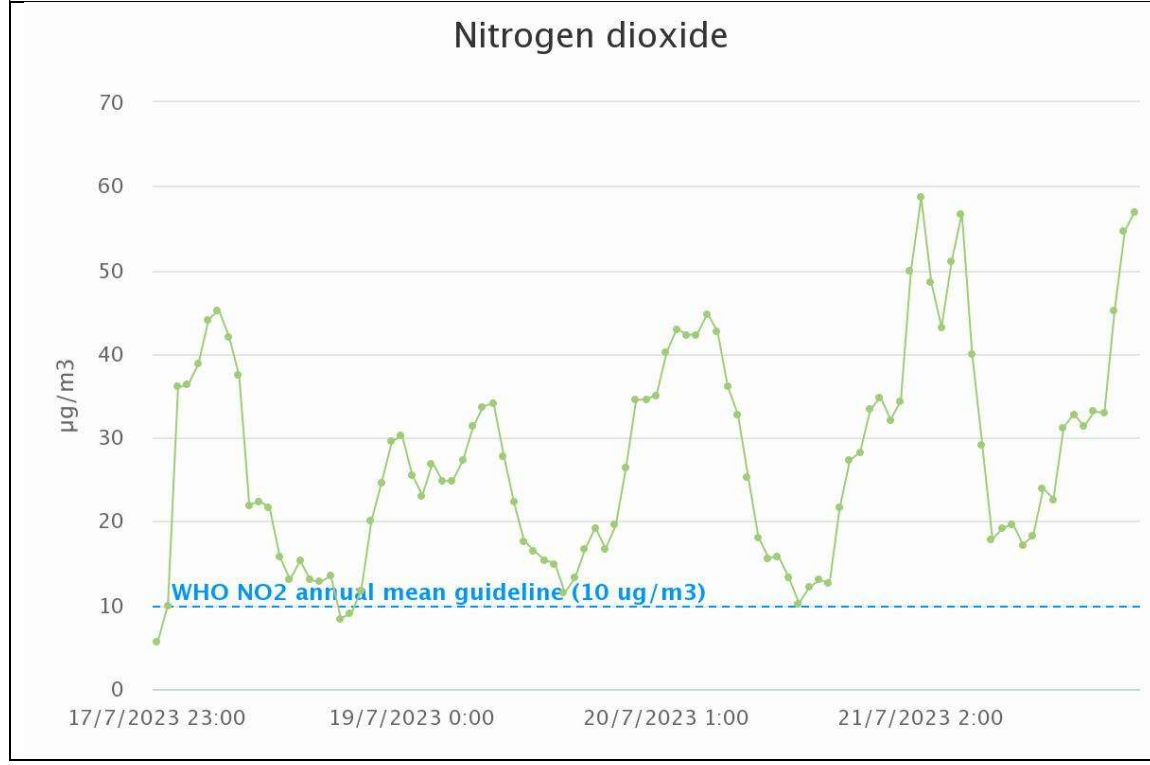
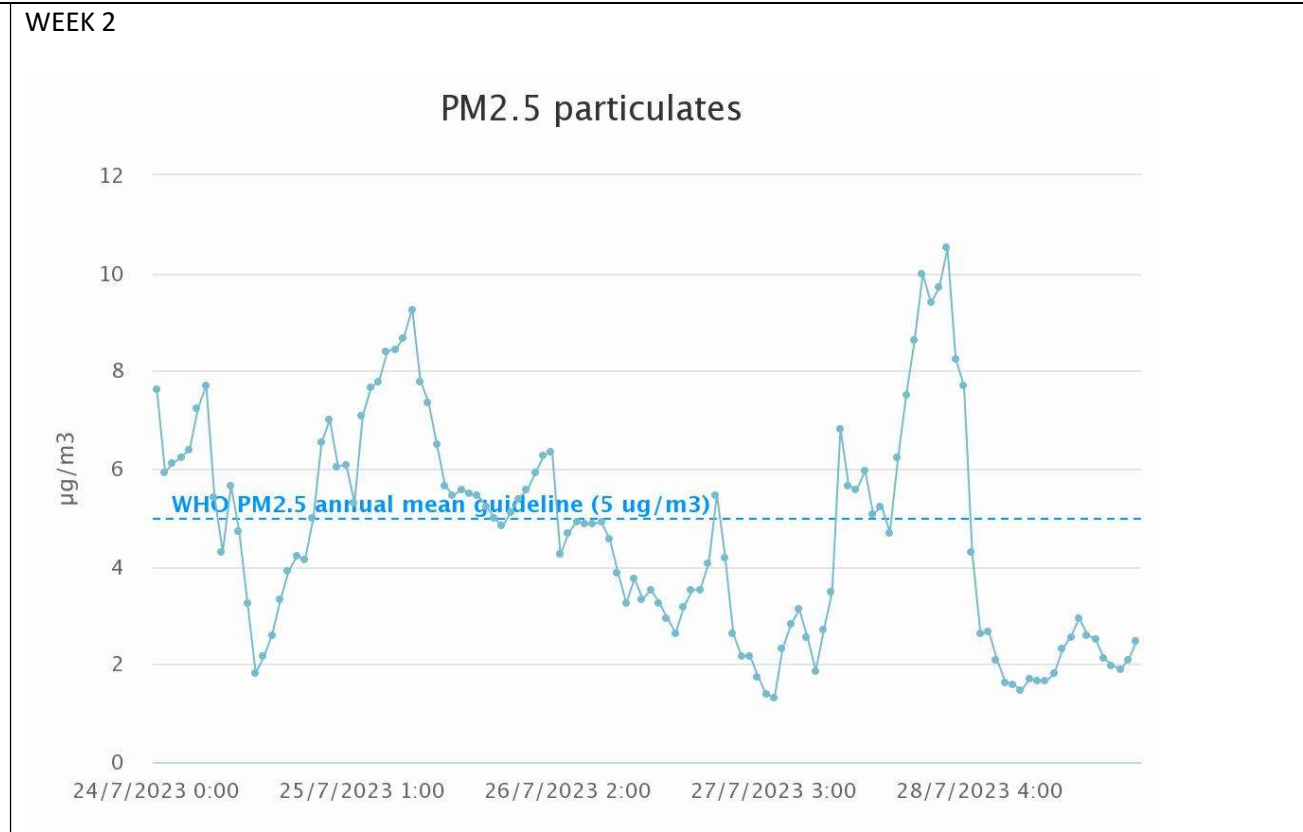
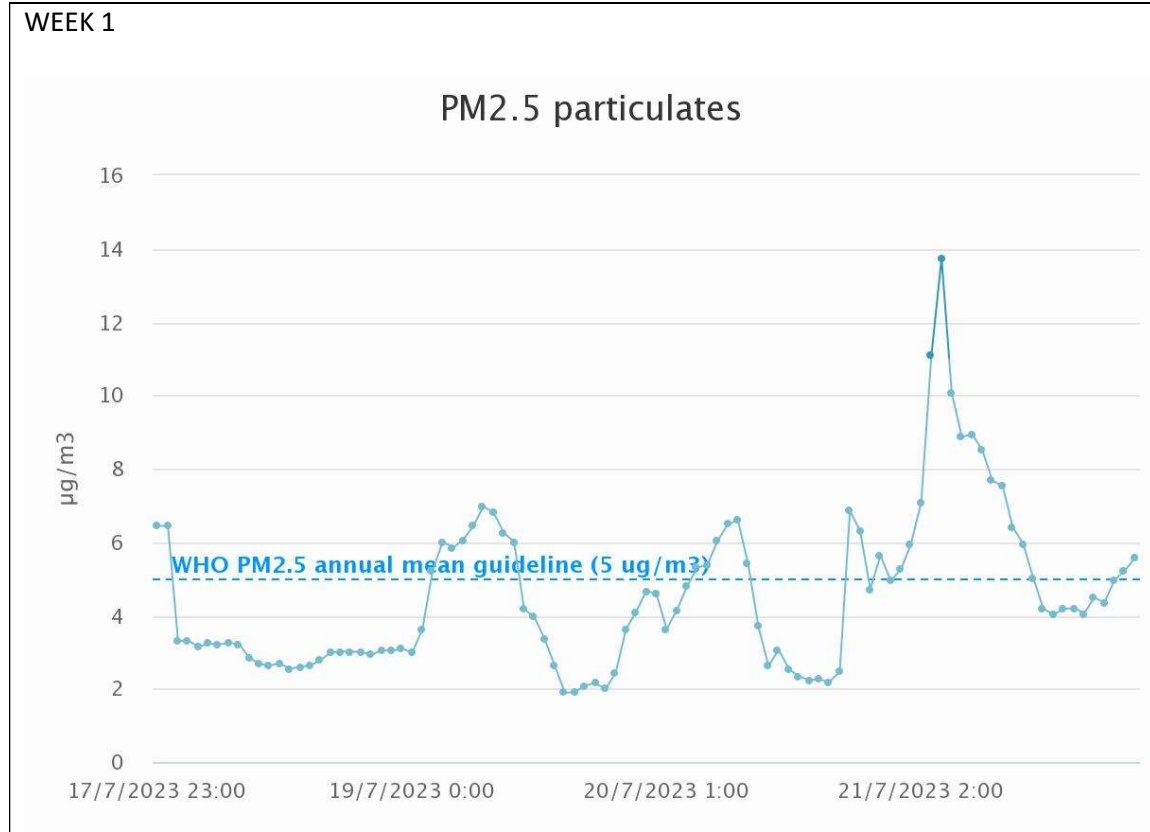
Sample week 2; School holidays; Monday 24 July to Friday 28 July 2023



Ridgeway Primary School (Southcote Road)

Sample week 1; School term time; Monday 17 to Friday 21 July 2023.

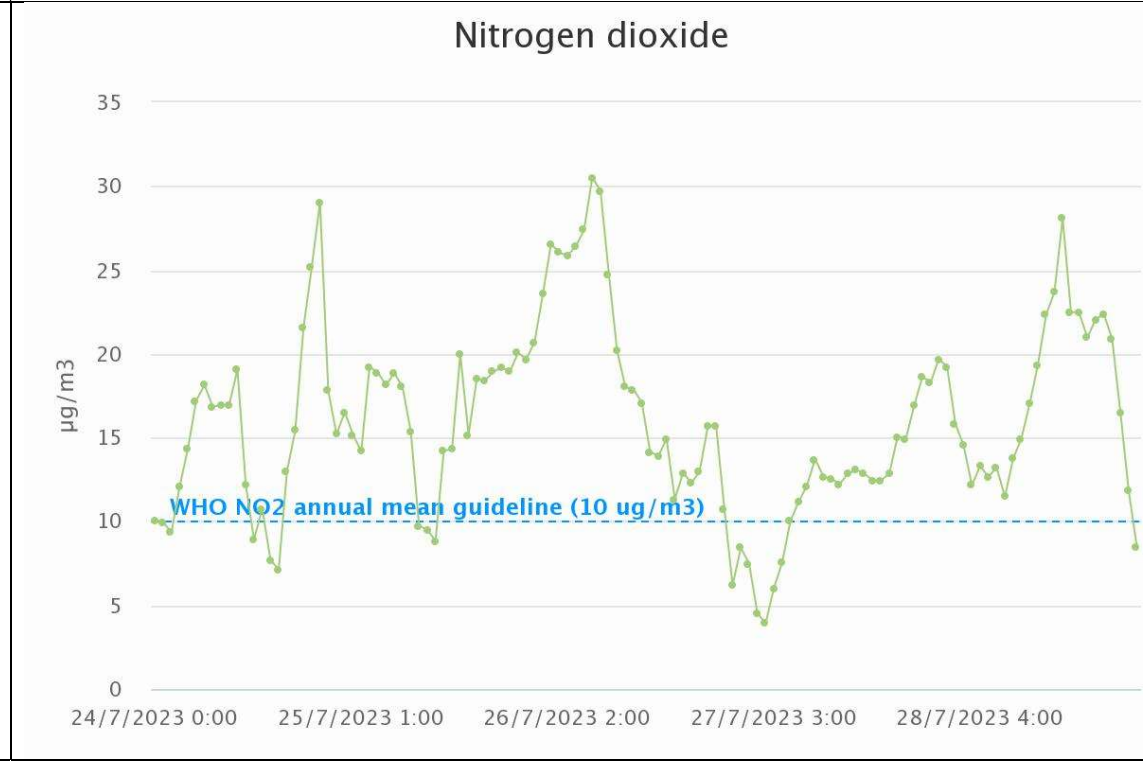
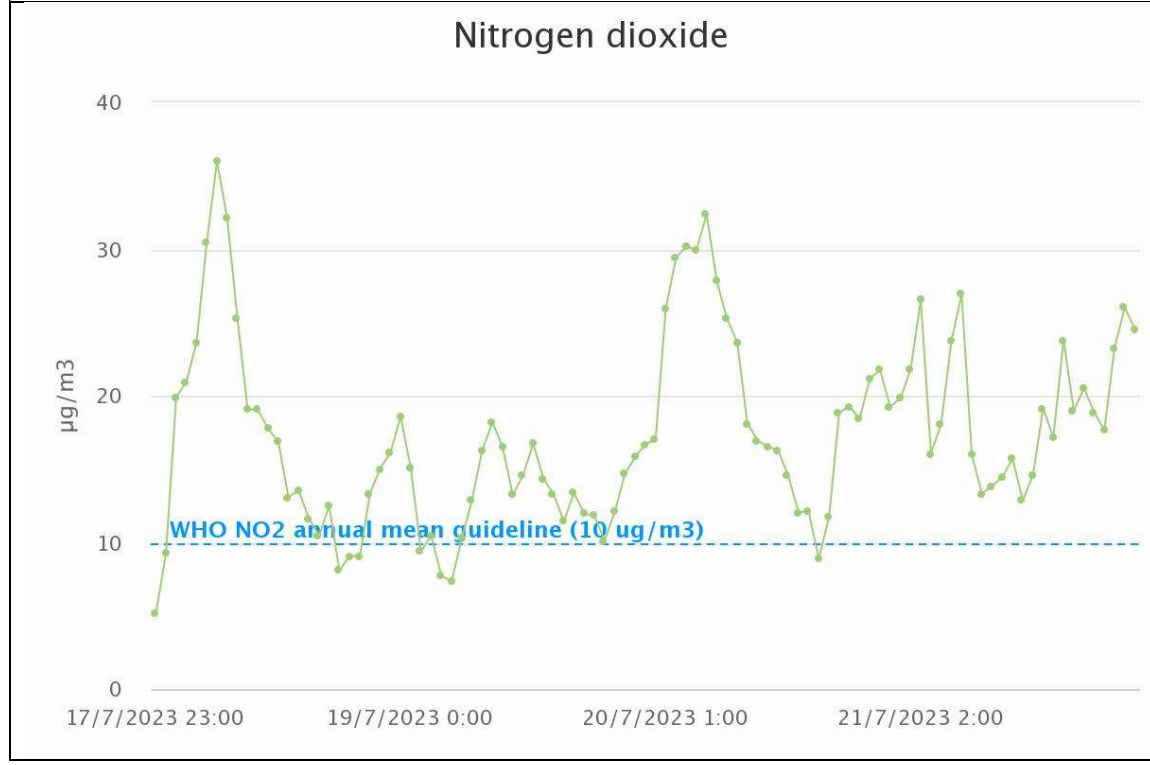
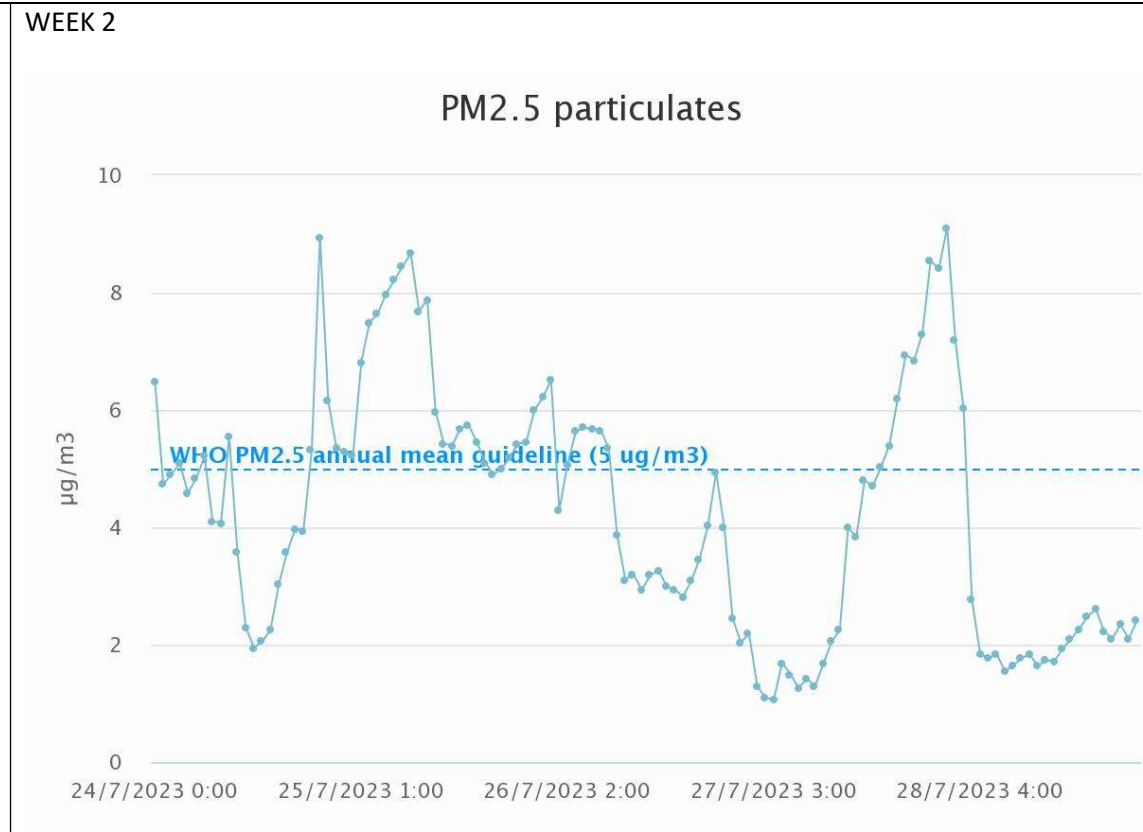
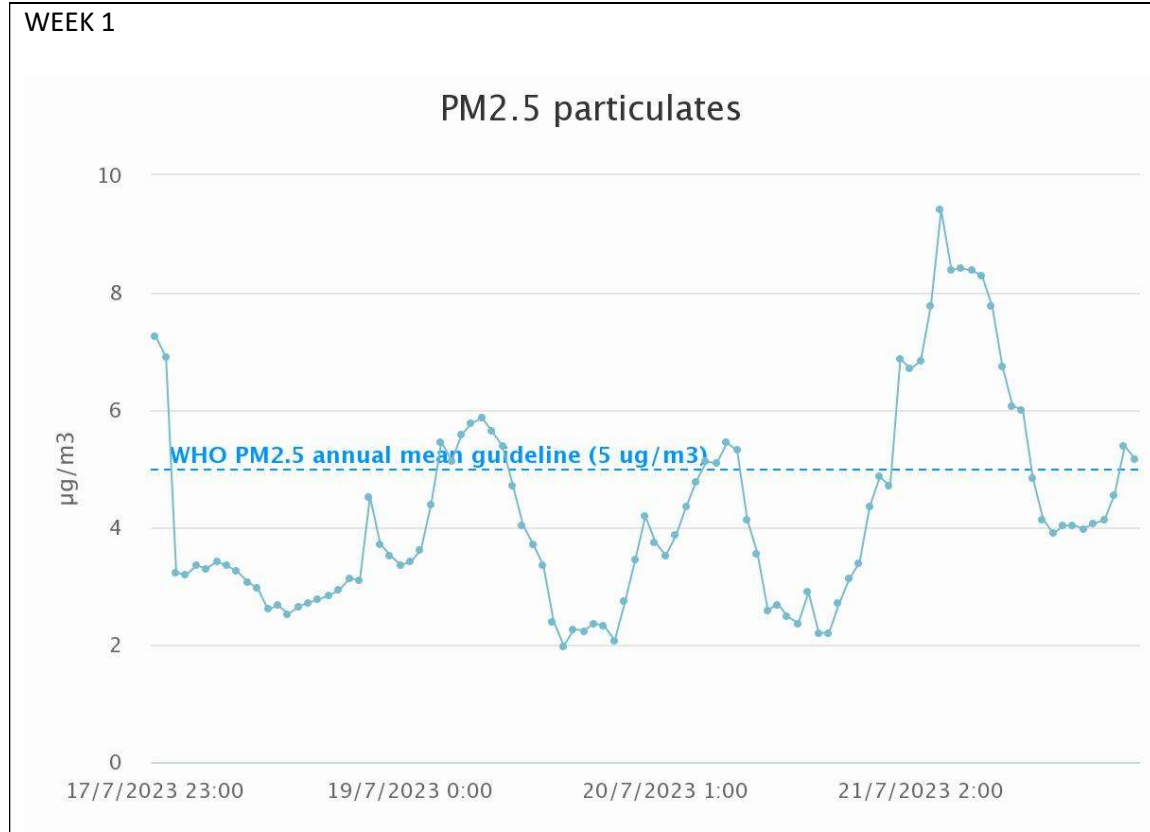
Sample week 2; School holidays; Monday 24 July to Friday 28 July 2023



Kingsley Primary Academy (Thomson Crescent)

Sample week 1; School term time; Monday 17 to Friday 21 July 2023.

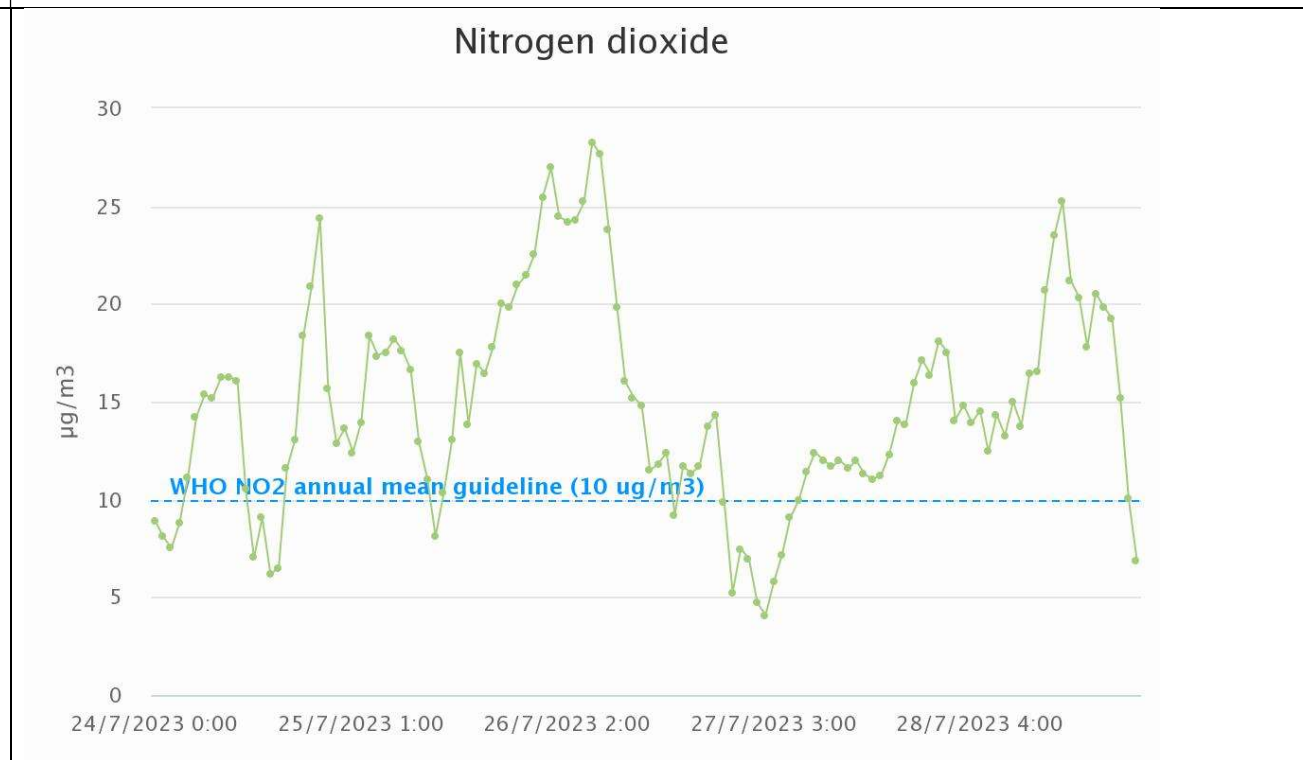
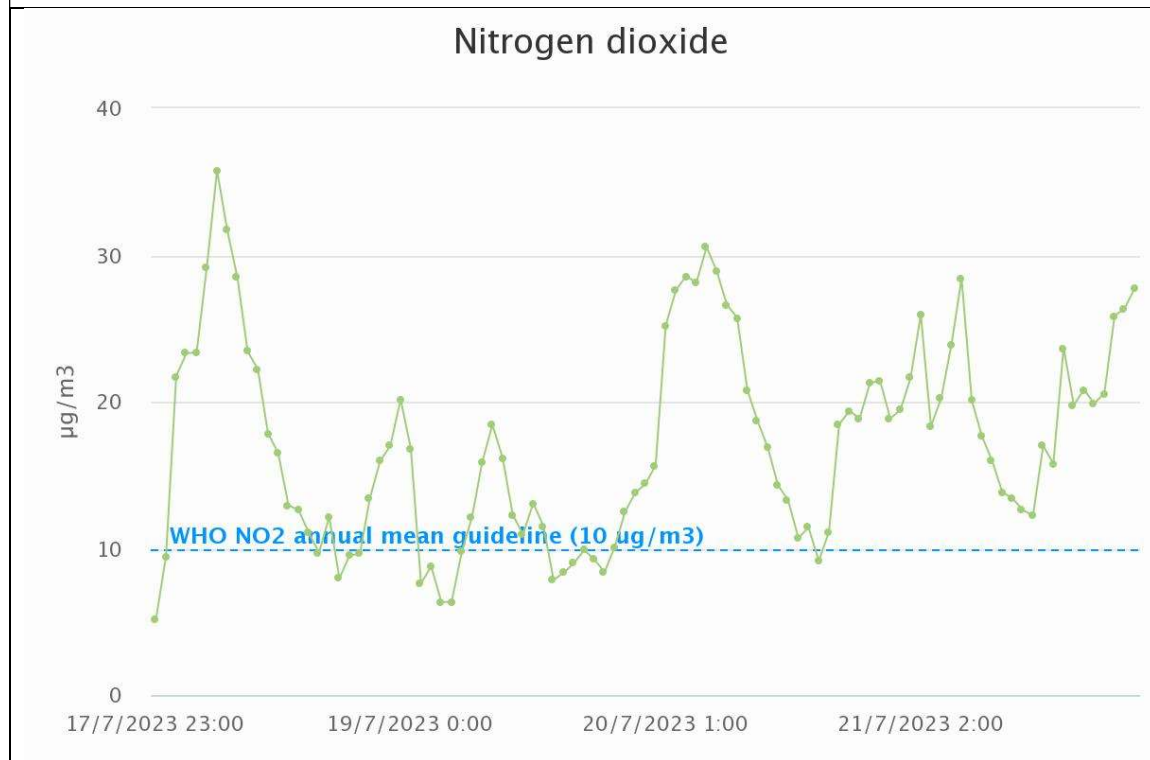
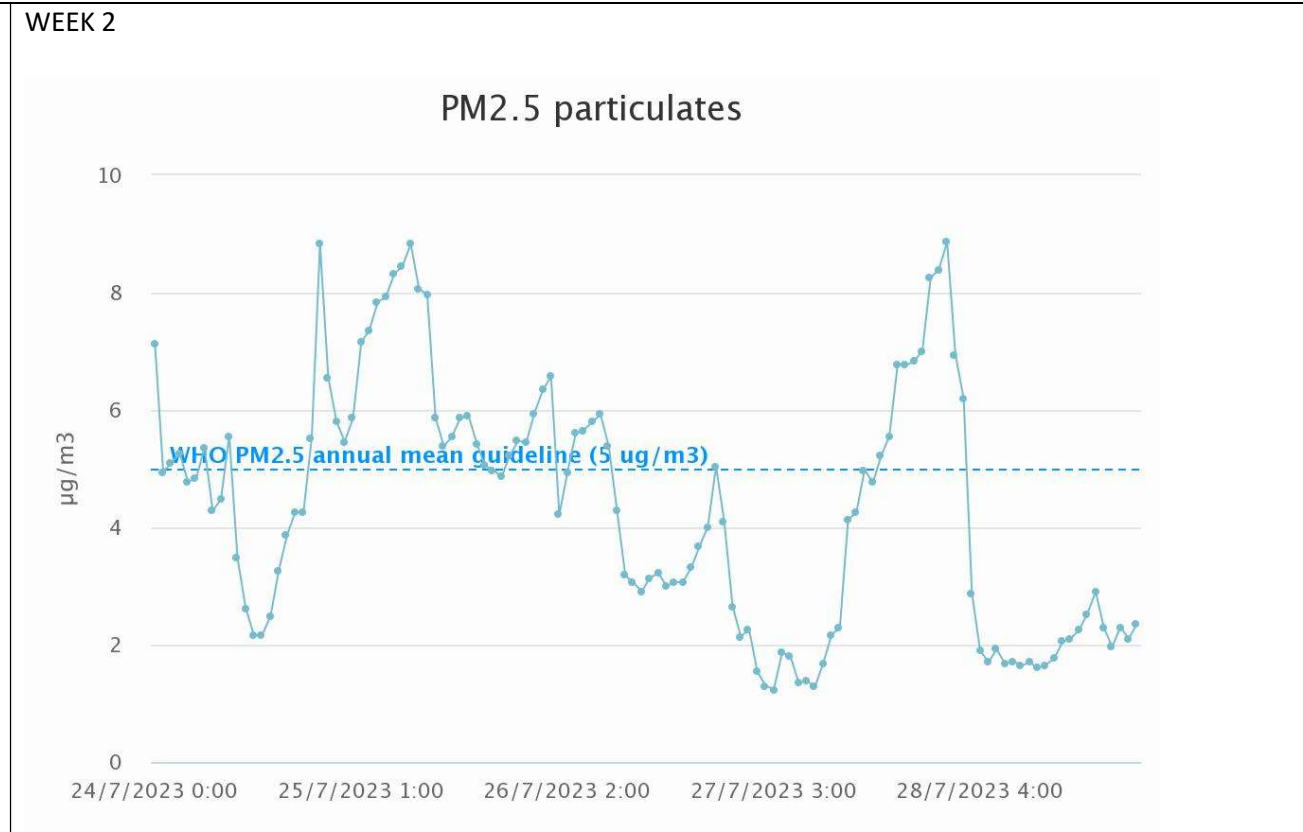
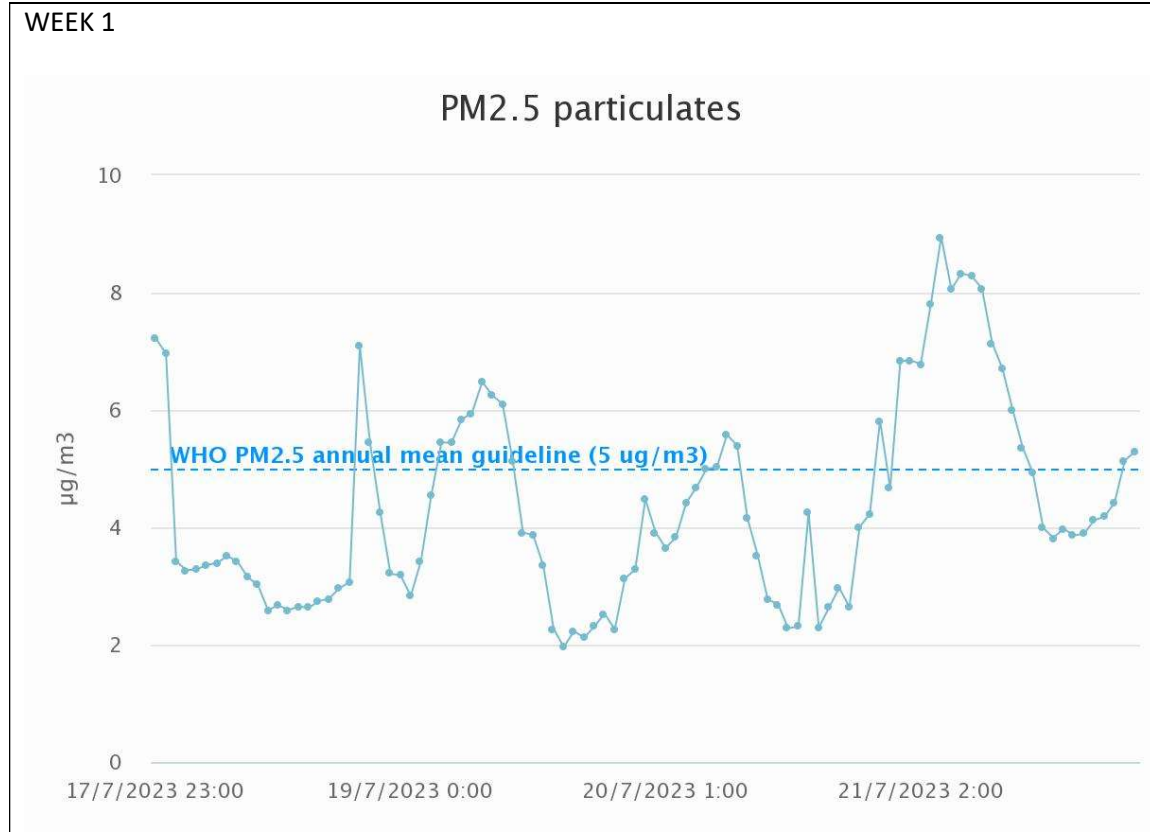
Sample week 2; School holidays; Monday 24 July to Friday 28 July 2023



Kingsley Primary Academy (Chapman Road)

Sample week 1; School term time; Monday 17 to Friday 21 July 2023.

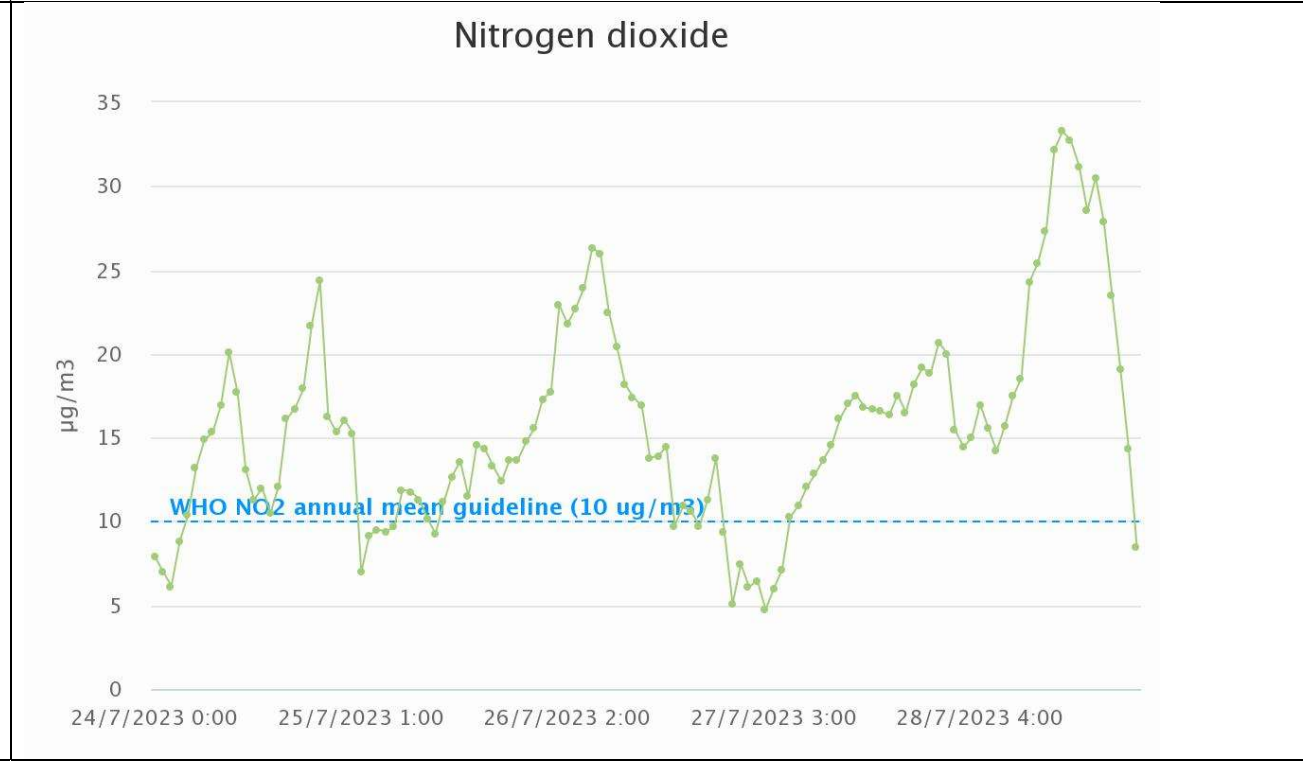
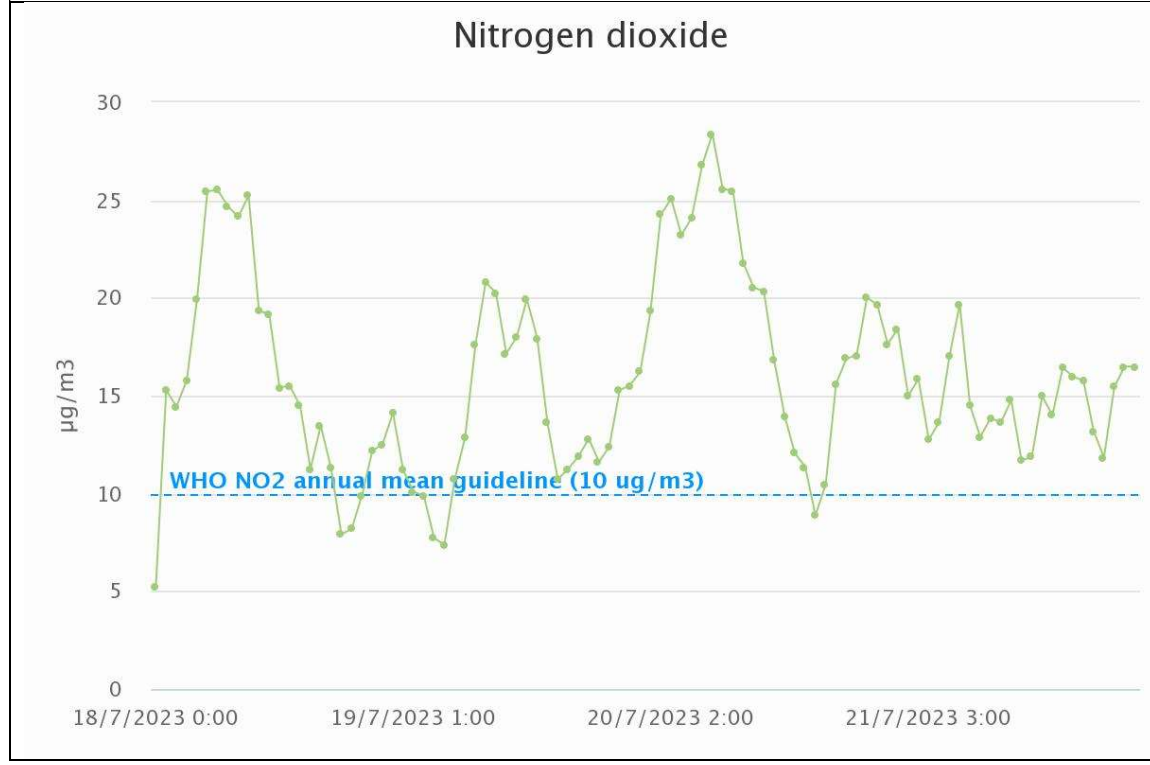
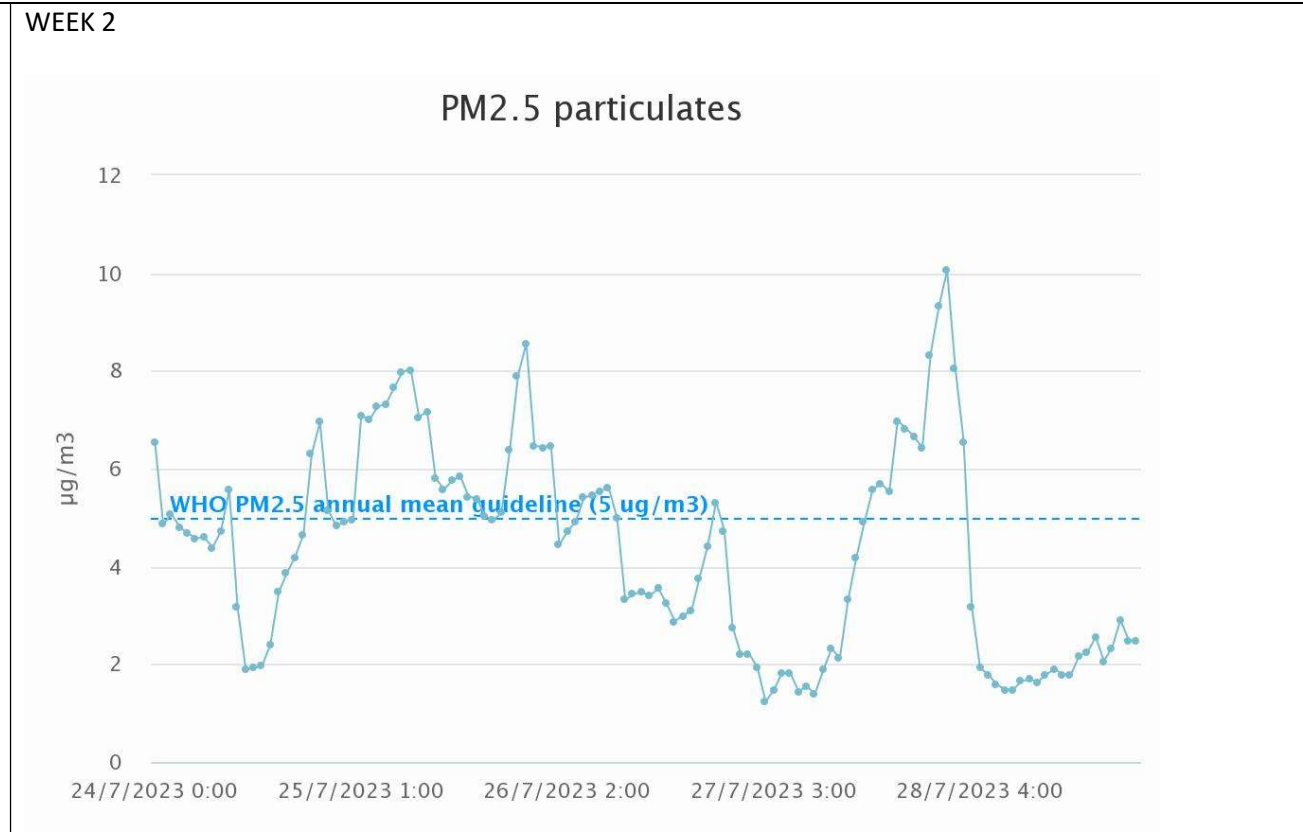
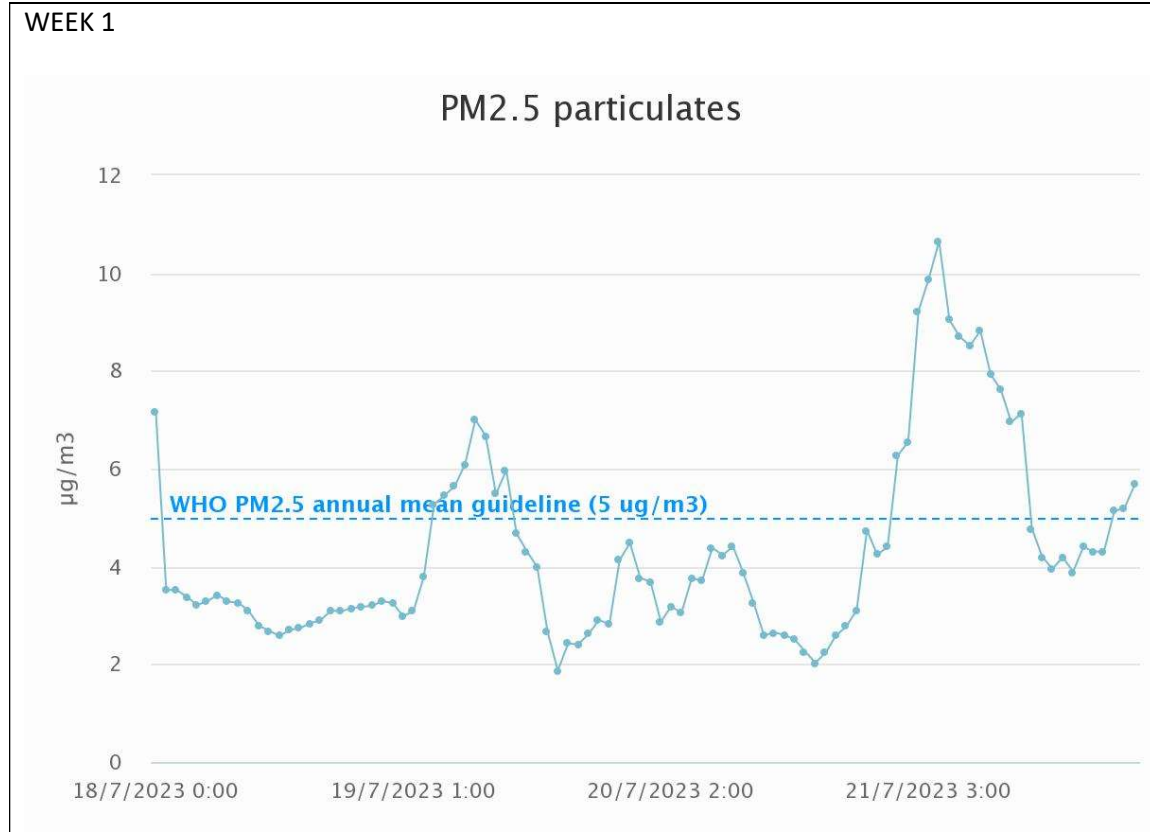
Sample week 2; School holidays; Monday 24 July to Friday 28 July 2023



St Joseph Catholic Junior School (Woodend)

Sample week 1; School term time; Monday 17 to Friday 21 July 2023.

Sample week 2; School holidays; Monday 24 July to Friday 28 July 2023



Equality Analysis Form

1. Introduction

1.1 Purpose of Equality Analysis

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

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

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

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

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

2. Proposed change

Directorate	Sustainable Communities, Regeneration & Economic Recovery Directorate
Title of proposed change	Healthy School Streets
Name of Officer carrying out Equality Analysis	Jayne Rusbatch

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

The council's Parking Policy 2019-2022 aims to effectively manage parking provision across the borough in line with the Corporate Plan and the borough's growth objectives. Section 4 of this policy details the School Streets objectives, to ensure we secure a healthy and safe environment near to schools and to help children and parents use cars less and to walk, cycle and use public transport more. The school run presents a particularly harmful combination of air pollution and inactivity for our children and parents.

The Council introduced the first School Streets schemes in 2017 and in April 2022 re-introduced a further 10 Street schemes under Experimental Traffic Management Order (ETMOs), for a period of 18 months. School streets restrict access for motor traffic except resident permit holders, cyclists, emergency services and certain other groups such as carers and those with disabilities.

The Council is now proposing to introduce a further nine School Streets under ETMO, for a period of 18 months. The first 6 months of this 18 month period are known as "statutory objection period" during which anyone affected by the trial scheme has an opportunity to submit objections while the trial is in operation.

Motor traffic is restricted from entering the School Street at pick up and drop off times, reclaiming road space to create pedestrian and cycle zones. The operational hours for each School Street are 08.00 – 9.30 and 2-4pm Monday to Friday term time only. Times are indicated by traffic signs. School Streets aim to create safer and more pleasant environment outside each school, discouraging travel to school by car and promoting walking, cycling and scooting, achieving positive health outcomes for all.

The changes described allow each school and resident community access to the reclaimed space on the road, changing the way the streets are used. It is hoped that this new use of space by the school and community will support active travel.

Reducing traffic from the school gates also helps to tackle air pollution, which is a significant problem for children and pregnant women. Children are particularly vulnerable to the effects of air pollution and, in the context of School Streets, recent studies have indicated that increases in particulate matter PM2.5 can make individuals more susceptible to the effects of COVID-19, increasing the mortality rate. This is therefore a public health priority. Removing congested traffic and idling vehicles from the immediate vicinity of the school entrance, while creating an environment that encourages families to travel to school more actively, may have positive health outcomes for the school community. It is hoped that increased safety and reduced convenience for those driving will encourage more children and parents to walk, cycle and scoot to school.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Deciding whether the potential impact is positive or negative

School Streets aim to discourage travel to school by car and promote active travel. This is important as in Croydon, we have a growing issue with obesity in the population, including children. Croydon has the fourth largest proportion of young people in London, with one in four Croydon residents (24.5%) aged between 0-17 years*. It is known that around 1 in 5 children (21.8%) in reception were overweight or living with obesity, and this position worsens in their last year of primary school (Year 6) where around 2 in 5 children (39.5%) were overweight or living with obesity*. School Streets create healthy and safe environment near to schools, to encourage modal shift, which will in turn contribute to addressing the obesity issue.

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The 65 years plus age group makes up 13.9% of the total population in Croydon. In London, this proportion is smaller at 12.2% and in England it is much bigger at 19.6%*. There is likelihood that some of this group may be more reliant on vehicular modes of travel, and consequently would be disadvantaged by the proposals in that they could not drive in the School Streets during the operational hours, but this is more than outweighed by the air pollution benefits. Air pollution is an important public health issue contributing to illness and shortened life expectancy, that disproportionately impacts on the most vulnerable in the population, in particular the sick, young and elderly.

The 2011 Census figures showed that 14.1% of the population in Croydon had their day-to-day activities limited to some extent by a long-term health problem or disability. School Streets will not disproportionately impact on this group as eligible residents are able to apply for exemption permits, to allow them (or their nominated carer) to drive in the School Streets during the operational hours.

* Source: Croydon Observatory www.croydonobservatory.org

+ Source: *Patterns and trends in child obesity in Croydon; A presentation of 2019/20 NCMP data at local authority level, July 2021*

Table 1 – Positive/Negative impact

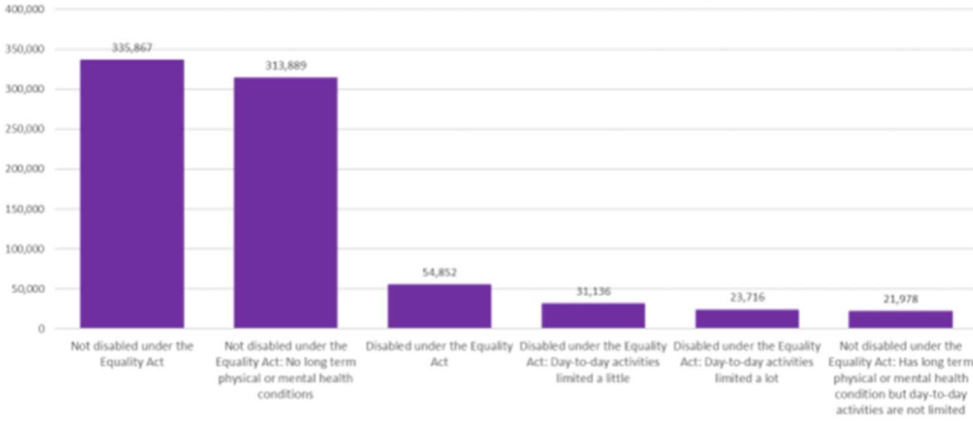
For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
-----------------------------------	-----------------	-----------------	--------------------

<p>Age</p>	<ul style="list-style-type: none"> The school streets schemes treat in general primary school sites, and therefore all age groups will benefit from a safer, quieter and clean street scene during pick up/drop off times. The schemes may offer additional space where footways are narrow making areas outside the school gates less congested. The elderly population may also benefit from such schemes as equally to the younger age groups this will provide them with a quieter street scene where as an example crossing the 	<ul style="list-style-type: none"> For children that may need to be dropped/picked up close to the school gates, for reasons such as injuries or disabilities the school street may temporarily be a hindrance. However, the council has made provisions to the schools to request access on their behalf in such circumstances. Conversely, older people may be more reliant on travel by motor vehicle and in some cases journey times may increase as a result of the proposal, but the impact is expected to be limited and outweighed by improvements to safety and air quality 	<ul style="list-style-type: none"> Air quality action plan 2017 – 2022. <p><u>Population change (%) by age group in Croydon 2011-2021</u></p> <p>This is how Croydon compares. There has been an increase of 19.7% in people aged 65 years and over, an increase of 7.0% in people aged 15 to 64 years, and an increase of 1.9% in children aged under 15 years.</p> <table border="1"> <thead> <tr> <th>Age Group</th> <th>Change (%)</th> </tr> </thead> <tbody> <tr><td>90 +</td><td>24%</td></tr> <tr><td>85 to 89</td><td>19%</td></tr> <tr><td>80 to 84</td><td>13%</td></tr> <tr><td>75 to 79</td><td>9%</td></tr> <tr><td>70 to 74</td><td>31%</td></tr> <tr><td>65 to 69</td><td>22%</td></tr> <tr><td>60 to 64</td><td>19%</td></tr> <tr><td>55 to 59</td><td>37%</td></tr> <tr><td>50 to 54</td><td>17%</td></tr> <tr><td>45 to 49</td><td>-9%</td></tr> <tr><td>40 to 44</td><td>6%</td></tr> <tr><td>35 to 39</td><td>17%</td></tr> <tr><td>30 to 34</td><td>10%</td></tr> <tr><td>25 to 29</td><td>-1%</td></tr> <tr><td>20 to 24</td><td>-8%</td></tr> <tr><td>15 to 19</td><td>-5%</td></tr> <tr><td>10 to 14</td><td>10%</td></tr> <tr><td>5 to 9</td><td>8%</td></tr> <tr><td>0 to 4</td><td>-10%</td></tr> </tbody> </table>	Age Group	Change (%)	90 +	24%	85 to 89	19%	80 to 84	13%	75 to 79	9%	70 to 74	31%	65 to 69	22%	60 to 64	19%	55 to 59	37%	50 to 54	17%	45 to 49	-9%	40 to 44	6%	35 to 39	17%	30 to 34	10%	25 to 29	-1%	20 to 24	-8%	15 to 19	-5%	10 to 14	10%	5 to 9	8%	0 to 4	-10%
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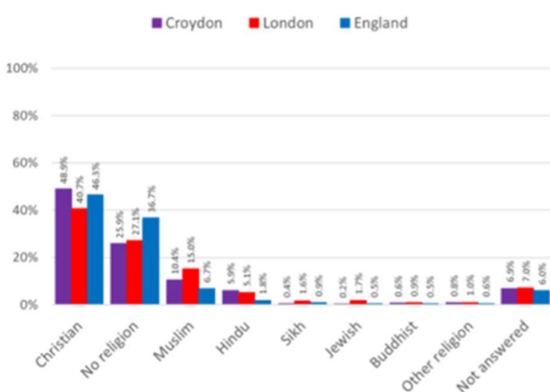
	<p>road outside the school may make it easier without the need to look out for moving traffic.</p> <ul style="list-style-type: none">• The scheme benefits people of all ages as it encourages travel to and from school in an active forms such as walking and cycling resulting in better health outcomes.• Public Health (NHS) data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London. 7.5% of premature deaths in Croydon are linked to air pollution. Failing to address NOx		
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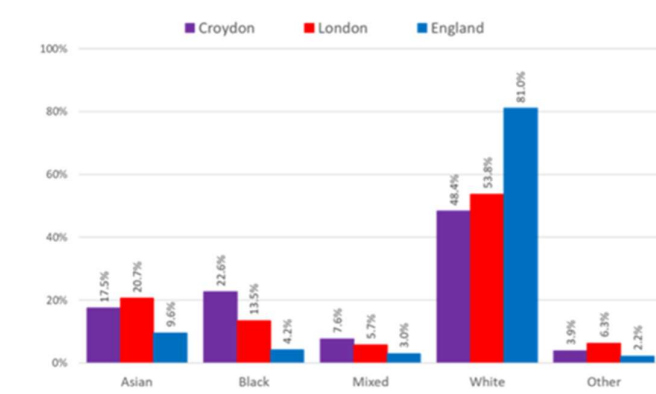
	<p>and particulate matter emissions in Croydon would deprive many local people of their fundamental right to safe air.</p> <ul style="list-style-type: none">• Public Health data shows one in four Croydon residents (24.5%) aged between 0-17 years. It is known that around 1 in 5 children (21.8%) in reception were overweight or living with obesity, and this position worsens in their last year of primary school (Year 6) where around 2 in 5 children (39.5%) were overweight or living with obesity.		
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<p>Disability</p>	<ul style="list-style-type: none"> Exemptions apply to all residents who have a vehicle registered to an address within a School Street zone. This includes any residents who may have disabilities. Reducing road danger also has the potential to enable more people to participate in active travel who may previously have been discouraged to so perhaps because of their disability. For example, cycles can improve mobility and access for disabled people, many of whom do not have access to motor vehicles. 	<ul style="list-style-type: none"> There may be individuals who are not aware that they could be eligible for an exemption even in limited special circumstances. Blue Badge holders are eligible for an exemption, as are residents who have registered carers (the carers vehicle is exempted). As a mitigation measure the council will inform the public of the potential exemptions they may be able to apply for. 	<p>Air quality action plan 2017 – 2022</p> <p>Blue Badge Scheme</p> <p>Croydon Observatory</p> <p>Disabled Parking Accreditation Scheme in association with Disabled Motoring UK.</p> <p>Disability</p> <p>Croydon - Disability</p>  <table border="1"> <thead> <tr> <th>Category</th> <th>Count</th> </tr> </thead> <tbody> <tr> <td>Not disabled under the Equality Act</td> <td>335,867</td> </tr> <tr> <td>Not disabled under the Equality Act: No long term physical or mental health conditions</td> <td>313,889</td> </tr> <tr> <td>Disabled under the Equality Act</td> <td>54,852</td> </tr> <tr> <td>Disabled under the Equality Act: Day-to-day activities limited a little</td> <td>31,136</td> </tr> <tr> <td>Disabled under the Equality Act: Day-to-day activities limited a lot</td> <td>23,716</td> </tr> <tr> <td>Not disabled under the Equality Act: Has long term physical or mental health condition but day-to-day activities are not limited</td> <td>21,978</td> </tr> </tbody> </table>	Category	Count	Not disabled under the Equality Act	335,867	Not disabled under the Equality Act: No long term physical or mental health conditions	313,889	Disabled under the Equality Act	54,852	Disabled under the Equality Act: Day-to-day activities limited a little	31,136	Disabled under the Equality Act: Day-to-day activities limited a lot	23,716	Not disabled under the Equality Act: Has long term physical or mental health condition but day-to-day activities are not limited	21,978
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	<ul style="list-style-type: none"> If individuals do not have a Blue Badge, additional exemptions may be considered in special circumstances on a case by case basis. For example, to allow a SEN Transport bus to collect a child from a residence within a School Street. 											
Sex	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures 		<p>Air quality action plan 2017 – 2022</p> <table border="1"> <caption>Air quality action plan 2017 – 2022 Gender Distribution</caption> <thead> <tr> <th>Year</th> <th>Female (%)</th> <th>Male (%)</th> </tr> </thead> <tbody> <tr> <td>2021 estimate</td> <td>51.9%</td> <td>48.1%</td> </tr> <tr> <td>2011 estimate</td> <td>51.5%</td> <td>48.5%</td> </tr> </tbody> </table>	Year	Female (%)	Male (%)	2021 estimate	51.9%	48.1%	2011 estimate	51.5%	48.5%
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	<ul style="list-style-type: none"> The proposal is expected to increase participation among under-represented groups in schools that are located in areas of higher deprivation. The schemes may help to create an environment helping to increase the proportion of BAME groups who choose to cycle. 																																						
<p>Sexual Orientation</p>	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking 		<p>Air quality action plan 2017 – 2022</p> <p><u>Sexual Orientation (16 year or over)</u></p> <table border="1"> <thead> <tr> <th>Sexual Orientation</th> <th>Croydon</th> <th>London</th> <th>England</th> </tr> </thead> <tbody> <tr> <td>Straight or Heterosexual</td> <td>87.8%</td> <td>86.2%</td> <td>89.4%</td> </tr> <tr> <td>Gay or Lesbian</td> <td>1.5%</td> <td>2.2%</td> <td>1.5%</td> </tr> <tr> <td>Bisexual</td> <td>1.2%</td> <td>1.5%</td> <td>1.3%</td> </tr> <tr> <td>Pansexual</td> <td>0.3%</td> <td>0.4%</td> <td>0.2%</td> </tr> <tr> <td>Asexual</td> <td>0.0%</td> <td>0.0%</td> <td>0.1%</td> </tr> <tr> <td>Queer</td> <td>0.0%</td> <td>0.1%</td> <td>0.0%</td> </tr> <tr> <td>All other sexual orientations</td> <td>0.0%</td> <td>0.0%</td> <td>0.0%</td> </tr> <tr> <td>Not answered</td> <td>9.1%</td> <td>9.5%</td> <td>7.5%</td> </tr> </tbody> </table> <ul style="list-style-type: none"> According to Census 2021 data, just under 9 in every 10 people are straight or heterosexual in Croydon, London and England. Just under 1 in 10 did not answer the sexual orientation question in Croydon (9.1%) and London (9.5%). In England generally, 7.5% did not answer the question. Of those who answered the question, the LGBT+ community amounted to 3.1% in Croydon, 4.3% in London and 3.2% in England. 	Sexual Orientation	Croydon	London	England	Straight or Heterosexual	87.8%	86.2%	89.4%	Gay or Lesbian	1.5%	2.2%	1.5%	Bisexual	1.2%	1.5%	1.3%	Pansexual	0.3%	0.4%	0.2%	Asexual	0.0%	0.0%	0.1%	Queer	0.0%	0.1%	0.0%	All other sexual orientations	0.0%	0.0%	0.0%	Not answered	9.1%	9.5%	7.5%
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	related measures.		
Pregnancy or Maternity	<ul style="list-style-type: none"> The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures. 	<ul style="list-style-type: none"> Potential negative impact on parents during pregnancy from the driving restrictions. As a mitigation measure the council can issue temporary exemptions on a case by case basis if needed. 	Air quality action plan 2017 – 2022

Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

3.2 Additional information needed to determine impact of proposed change

Table 2 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	Information source	Date for completion
Additional information may come to light during the implementation phase of the schemes and will monitor this.		

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Table 3 – Impact scores

Column 1	Column 2	Column 3	Column 4
PROTECTED GROUP	LIKELIHOOD OF IMPACT SCORE	SEVERITY OF IMPACT SCORE	EQUALITY IMPACT SCORE
	<p>Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p>Equality impact score = likelihood of impact score x severity of impact score.</p>
Age	3	2	6
Disability	3	2	6
Gender	3	1	3
Gender reassignment	2	1	2
Marriage / Civil Partnership	3	1	3
Race	3	1	3
Religion or belief	3	1	3
Sexual Orientation	3	1	3
Pregnancy or Maternity	3	2	6

4. Statutory duties

4.1 Public Sector Duties

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

Advancing equality of opportunity between people who belong to protected groups X

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Important note: Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified above (table 1). Attach evidence or provide link to appropriate data, reports, etc.):

Table 4 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	There may be individuals who are not aware that they could eligible for an exemption even in limited special circumstances.	As a mitigation the council will inform the public of the potential exemptions they may be able to apply for, through communications around the sites at the time of launch and permanently on our website.	Jayne Rusbatch	Prior to and at launch of each site Ongoing via the website

Equality Analysis

		Review exemptions criteria to ensure no unanticipated impact on protected characteristic group	Jayne Rusbatch	12 months after launch
Race		Identify any further data sources to monitor impact and review EqIA	Jayne Rusbatch	3 months after decision
Sex (gender)		Identify any further data sources to monitor impact and review EqIA	Jayne Rusbatch	3 months after decision
Gender reassignment				
Sexual orientation				
Age	<p>For children that may need to be dropped/picked up close to the school gates, for reasons such as injuries or disabilities, the School Street may temporarily be a hindrance.</p> <p>Conversely, older people may be more reliant on travel by motor vehicle and in some cases journey times may increase as a result of the proposal.</p>	<p>The council has made provisions for the schools to request access on their behalf in such circumstances.</p> <p>The council will assess requests from older people on a case-by-case basis and make special arrangements through the permit system.</p>	Jayne Rusbatch	Ongoing (process already in place)
Religion or belief				
Pregnancy or maternity	Pregnant parents would be restricted from driving in the School Street.	As a mitigation measure the council can issue temporary exemptions on a case by case basis where needed. The council will inform the public of the potential exemptions they may be able to apply for, through communications around the sites at	Jayne Rusbatch	Prior to and at launch of each site Ongoing via the website

Equality Analysis

		the time of launch and permanently on our website.		
Marriage/civil partnership				

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter **X** in column 3 (**Conclusion**) alongside the relevant statement to show your conclusion.

Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review.	
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form; The introduction of the School Streets will be under an Experimental Traffic Management Order, and hence this gives the council the ability to adjust the proposals should it be identified during the initial 6 month objection period, that they are having an adverse effect on any of the identified groups.	X
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.	
Stop or amend the	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	

Equality Analysis

proposed change	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet	Meeting title: Cabinet Date: September 2023

7. Sign-Off

Officers that must approve this decision	
Equalities Lead	Name: Denise McCausland Date: 15th August 2023 Position: Equalities Manager
Director	Name: Date: Position:

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Data Protection Impact Assessment (DPIA)

Project Name:	School Streets
Project Manager or Sponsor (PM):	Tabrez Hussain / Jayne Rusbatch
Name of person completing the DPIA if different to (PM):	
Service Team and Department:	Highways & Parking Services Sustainable Communities
Relevant Director and Executive Director:	Steve Iles Sarah Hayward
Information Management Champion(s) for service area:	
Date DPIA received by the IMT:	
Date approved by DPO:	17 February 2022
Date approved by IMT :	

1 Project Scope

You should describe here the nature, scope, context and purpose of the processed processing. (Include the projects aims, potential impact, all individuals involved in the project and those that may be affected by it. The stakeholders should be as broad as possible so that the list can be edited down after consultation. You should summarise why you identified the need for a DPIA).

The need for a DPIA has been identified as the project will involve public statutory consultation and the collection of their responses to the statutory consultation. This requires the below DPIA.

Once the project is up and running the project will involve collection, processing and retention of Vehicle Registration Marks (VRM) for the purposes of enforcement. The DPIAs for these activities has been carried out by the Parking Enforcement Team as a separate exercise.

The project aims are as follows:

- To address concerns around road safety outside school gates
- To address concerns around pollution and idling vehicles outside school gates
- To encourage the use of active sustainable transport modes when travelling to and from school
- To support Croydon's Transport objectives and more widely the London Mayor's Transport Strategy

The potential impacts of this project are as above together with minimal negative impact such as displacement of traffic, parking and minimal impacts on access for delivery vehicles, visitors etc during scheme operational hours.

The following are key stakeholders:

- The public/residents
- The Schools
- Businesses
- Local councillors
- Emergency Services
- Service Delivery vehicles

2 Data Description

Answer the questions below so that there is a clear understanding about how the information will be used, who will use it etc. Remember that it's personal information (i.e. information about individuals) that you need to be concerned with. If you do not have answers to all the questions at this time, simply record what you do know.

<p>Whose information is being used?</p> <ul style="list-style-type: none"> Are there additional concerns that need to be considered due to individuals sensitive/ complex circumstances? i.e. vulnerable person 	<p>We will be processing information provided by those people responding to the statutory consultation. The statutory consultation is voluntary and where participants take part they will be required to provide some personal information.</p> <p>Also Registered keepers information for vehicles for the processing of Penalty Charge Notices for those vehicles contravening the School Streets.</p>
<p>What information is being used?</p> <ul style="list-style-type: none"> Consider the nature of this information E.g. Child's social care file 	<p>Information being used for statutory consultation includes:</p> <ul style="list-style-type: none"> Address Name Email address <p>Personal Data Which May be used by the Council in order to issue and process Penalty Charge Notices and also provide services to customers</p> <ul style="list-style-type: none"> Vehicle Registration Mark, captured by camera and Civil Enforcement Officer, in order to identify a vehicle committing a contravention and used in order to obtain Keeper details. Registered Keeper details provided by the DVLA, in response to a KADOE (Keeper at Date of Offence Enquiry).

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	<ul style="list-style-type: none">• Keeper or Driver name and address, including e-mail address (if supplied) from Informal and Formal Representations against the issue of Penalty Charge Notices.• Customer details from correspondence.• Registered Keeper Name and address details from warrants of control passed to Enforcement Agencies.• Information regarding potential Registered Keeper or Driver vulnerability or financial information disclosed as part of an Informal or Formal Representation made to the council.• ad hoc information received regarding cases (i.e., complaints from drivers, enquiries from Councillors and MPs.• financial information regarding debtors. <p>Personal Data Which May be Shared with the Council by Enforcement Agencies</p> <ul style="list-style-type: none">• Correspondence records;• Evidence provided by debtors to Enforcement Agencies to support dialogue regarding the non-payment of Penalty Charges due to the issuing Authority.• Basic details of goods taken into control, such as the vehicle (vehicle registration number, registered keeper enquiries, vehicle make and model, location of vehicle, estimated vehicle value), other goods of value which the enforcement agent takes into control to sell (to settle the debt)• Basic details about debtors, such as name, address, telephone/mobile number, email address
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	<ul style="list-style-type: none"> • Images and audio recordings of debtors or third parties (not minors) if the enforcement officer has activated their body worn video camera • Financial details or / & disclosed medical information e.g. income and expenditure to inform decision making on whether to continue enforcement, whether repayment options are appropriate & whether to continue to pursue enforcement of the warrant of control where extreme vulnerability may be present • Call recordings and notes/transcripts of telephone calls made to the Enforcement Agency • Emails, text messages, correspondence in relation to any dealings with debtors • Information about debtors obtained by the enforcement agency from credit reference agencies, the electoral roll, Court records, and other publicly available sources <p>Some transaction information if debtors have paid monies towards settlement of the debt</p>
Does it include special category or criminal offence data?	No.
Can an individual be identified easily from the information?	Yes
<p>What is the potential impact on privacy of this information?</p> <ul style="list-style-type: none"> • <i>What are the risks/ impact to an individual if this information was lost, stolen or manipulated?</i> • <i>E.g. could it be sold?</i> 	<p>Personal data collected for the purpose of commenting or objecting to the proposals includes names, addresses and e-mail addresses. The risk to an individual, if this data were lost would include ID fraud.</p> <p>Information for processing Penalty Charge Notices:</p> <ul style="list-style-type: none"> • Could be used to locate an individual's address and potentially allow access to details of other

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	<p>PCNs, which could give information as to the driver’s likely routine, or where a driver has been (risk of stalking etc).</p> <ul style="list-style-type: none"> • Risk of ID fraud if identity details are released. • Sensitive information collected as part of assessing an individual's circumstances could be released. • Risks to individuals if information regarding their vulnerabilities is released.
<p>Will this change the manner in which we handle, use or protect this information? <i>e.g. should it be encrypted?</i></p>	<p>.</p> <p>Personal data with respect to commenting or objecting to public notices is treated carefully to ensure that this is unlikely to leak outside the project team (6 members). Data is retained in an electronic folder only accessible by the project team and retained for sufficient time to enable analyses of the comments.</p> <p>With respect to the processing of Penalty Charge Notices the back-office system ensures security of data, by enabling Enforcement Agencies to receive and return warrants via secure portals instead of by e-mail (which is the current solution).</p> <p>Security in place to protect data held on the system, restricted access, passwords, PC encryption, GDPR training already in place. ICT supplier is contractually obliged to comply with GDPR and information management requirements. Data security has been explored as part of the tender process and the supplier has met or exceeded the council requirements.</p> <p>Back Office System is integrated with a separate existing mail fulfilment solution (Quadient), which ensures outgoing correspondence is complete and addressed to the intended recipient. This eliminates the chance of data loss in this part of the process.</p>

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	<p>External Enforcement Agencies are contractually obliged to comply with a strict code of conduct (including industry code of conduct covering information-handling) and GDPR requirements.</p> <p>Council CCTV staff are all BTEC Trained to Level 2/3 CCTV Traffic Enforcement</p>
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3 Consultation process

Consider how to consult with relevant stakeholders.

When did you consult individuals?	The statutory consultation for the new experimental Traffic Management Order is likely start on 15 March 2022 and will last 6 months.
How did you consult individuals?	As part of the statutory consultation process addresses within the School streets and within an area approximately 200m surrounding the streets will be written to explaining the process and inviting comments or objections to the public notice within a 6 month period. Public notices are also fixed to lamp columns within the School Streets and these will be advertised in the Croydon Guardian and London Gazette. There will also be a link on the Croydon Council's website.
If not explain why it is not appropriate.	N/A
Who else within the organisation have you consulted with?	This project is largely contained within the Highways and Parking Service. However, other teams within the Sustainable Communities, Regeneration & Economic Recovery directorate have also been made aware of the changes including Strategic Transport which works closely with the Highway Improvement Team.
Do you need to speak with your processor to assist?	N/A
Do you plan to consult information security experts or any other experts?	Processing personal data as part of the consultation process is not deemed to require security experts as there are standard methods available to ensure data is secure – letters secured in lockable

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	<p>cabinets and e-mails only viewable by certain officers dealing with similar consultation on a daily basis including the project team (6 members). Relevant expertise was enlisted in drafting the tender specification and subject experts were part of the evaluation panel for the ANPR and processing software for the issuing and processing of Penalty Charge Notices.</p>
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4 Assessment of necessity and proportionality of data usage

<p>What is your lawful basis for processing?</p>	<p>The lawful basis for processing is the consultation being a task carried out in the public interest or in the exercise of official authority, principally it being an activity that supports or promotes democratic engagement, in accordance to GDPR Article 6(1)(e). Members of the public that comment or object to the public notice are informed, by return, that their personal data will only be used for the purpose of the formal consultation and retained for as long as necessary to enable this process to take place in accordance with GDPR.</p> <p>Relevant Statutes/Regulations associated with the enforcement and processing of Penalty Charge Notices using ANPR:</p> <ul style="list-style-type: none"> ○ Traffic Management Act 2004 ○ London local Authorities Act 1996 (as amended) ○ London Local Authorities Act 2000 ○ London Local Authorities and Transport for London Act 2003 ○ London Local Authorities Act 2007 ○ London Local Authorities and Transport for London Act 2008 ○ The Civil Enforcement of Parking Contraventions (England) General Regulations 2007 ○ The Civil Enforcement of Parking Contraventions (England) Representations and Appeals Regulations 2007 ○ The Taking Control of Goods Regulations 2013 ○ The Taking Control of Goods (Fees) Regulations 2014 ○ Road Traffic Regulation Act 1984 ○ Tribunals, Courts and Enforcement Act 2007
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	<ul style="list-style-type: none"> ○ The Secretary of State's Statutory Guidance to Local Authorities on the Civil Enforcement of Parking Contraventions ○ CCTV code of Practice for CCTV Traffic Enforcement <p>Compliance with the information Commissioners Code of Practice for CCTV</p>
<p>Is consent being relied upon to share the information? Has explicit consent been obtained? Are data subjects able to opt out from giving consent?</p>	<p>No. This is a statutory consultation and voluntary for public to take part. However whilst it is voluntary the council will process any personal information in accordance with GDPR (those making comments or objecting are informed that their personal data will only be used for the purpose of the consultation and retained for as long as necessary to complete this process).</p>
<p>Does the processing actually achieve your purpose?</p>	<p>Yes, it enables us to refine the analysis of the consultation responses and assists with validation.</p>
<p>How will the information be collected? Verbally, forms, intranet, interview, 3rd party, anonymous)</p>	<p>The information will be collected via an online forme-mails and letters. Acknowledgements will include a comment that personal data will only be used for the consultation process and retained fo as long as necessary to complete this process.</p>
<p>Is there another way to achieve the same outcome?</p>	<p>Statutory consultations must be carried out in line with regulations.</p>
<p>How will the information be used? <i>e.g. to write a report</i></p>	<p>The information will be used to produce a report on the results of the consultation. Processing of PCNs is by trained Council Officers. To enable the issue of PCN's and other Statutory Documentation. Reviewing of contraventions captured by CCTV (ANPR) by Qualified CCTV staff all BTEC Trained to Level 2/3 CCTV Traffic Enforcement. Enforcement of unpaid PCNs by external Enforcement Agencies to collect monies</p>

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	<p>due, or to construct an affordable payment plan, or to make an informed decision about an individual's circumstances.</p>
<p>Do the individuals know and understand how their information will be used? If there are changes to their information does the privacy notice need to be amended?</p>	<p>No. This is a statutory consultation and voluntary for public to take part. However whilst it is voluntary the council will process any personal information in accordance with GDPR.</p> <p>However as this statutory consultation published on the council's website there will be a Privacy Notice provided explaining that those that comment or object give information voluntarily, consent to it being processed and are aware of the GDPR rights. Personal data will be removed once the analysis is completed.</p> <p>Parking Services provide a privacy notice when processing Penalty Charge Notices.</p>
<p>How will it be stored, kept up to date and disposed of when no longer required? <i>e.g. stored in locked cabinet/securely shredded</i></p>	<p>The data will be stored on the Council's servers within a folder that can only be accessed by the project team only. Data on Penalty Charge Notices issued to drivers entering the School Streets during the restricted hours is held on the Parking back-office ICT system and also on Enforcement Agencies back-office systems</p>
<p>How will you ensure data quality and data minimisation?</p>	<p>The participation in the scheme consultation is voluntary and the extent to which a participant provides data is voluntary. For valid comments or objections to be received and processed a name and address is the minimum data required and an e-mail address if the responder uses this as a means to communicate and requires an e-mail response. Investigating officers keep PCN processing information up to date as they become aware of any changes during investigations. Any linked cases are updated at the same time. If cases are with Enforcement Agencies, debtor files</p>

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	<p>are updated in real time. Data received from the DVLA as a result of a mismatch is deleted from the system. CCTV (ANPR) contraventions are reviewed by staff Trained to BTEC Level 2/3 CCTV Traffic Enforcement to ensure that the Council has reasonable grounds for believing a contravention has occurred before requesting Keeper details from the DVLA.</p>
<p>Who will have access to the information within LBC?</p> <ul style="list-style-type: none"> • <i>Include approximate number of users</i> 	<p>The project team (6 members) PCN Processing Officers, Permit Staff (for processing permits for those that can enter the School Streets during the restricted periods such as residents living in the road and Parking Management – approximately 26 staff. CCTV staff and Management - approximately 15 staff. Infrastructure Team – 6 Staff Enforcement Team –7 Staff (Manager, Supervisors and Dispatch Controllers). However, staff are only able to access information appropriate to their role.</p>
<p>Are there new or significant changes to the way we manage, use, handle or collect this information?</p> <ul style="list-style-type: none"> • <i>Include any identified concerns for the individuals, would these changes heighten risks involved</i> 	<p>No. There is a standard approach to the processing of comments or objections to a public notice. This includes collating comments and objections, analysing and responding to these to determine whether the experimental scheme should be retained as implemented, amended or withdrawn depending on the level of objections and affects on the School Streets and surrounding area. Once this data is used and included in a report (not including personal data) then personal information such as names, addresses and e-mail addresses can be destroyed.</p>
<p>Will individuals within an existing database be subject to new or changed handling?</p> <ul style="list-style-type: none"> • <i>If yes amendments need to be made to the privacy notice and these individuals need to be informed.</i> 	<p>No.</p>
<p>What are the internal arrangements for processing this information? <i>e.g. number of staff who will have access</i></p>	<p>The project team (6 members – same as listed in 5a below) will process this consultation data.</p>

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	Currently around 54 staff within Parking Services could be involved with the issue and processing of any Penalty Charge Notices and issuing permits to those that qualify (i.e. residents and businesses within the school zones)
How will the information be updated? <i>e.g. monthly check</i>	There is one planned analysis of the data at the end of the consultation period. No further updates will be required. Once the comments and objections are analysed then personal data can be destroyed.
Does the project involve the exchange of information outside of the UK and are there set standards for how the information will be treated? How will you safeguard international transfers?	No
How will you prevent function creep?	By keeping access to the data to the project team and ensuring that they are aware of the content of this DPIA and of the need to prevent function creep. Personal data is only retained for sufficient time to enable analyses to take place. For the processing of Penalty Charge Notices data is only used for the purpose enforcing and collecting outstanding Penalty Charges and providing parking permits. No changes to the ICT system can take place by the supplier unless authorised by Parking Management and without completing and submitting an approved change request / work order form.

5 Assessment of the risks to the rights and freedoms of data subjects

You must describe the source of risk and the nature of potential impact upon individuals and identify any additional measures to mitigate those risks.

5a Security

Who will be responsible for the control for this information?	Jayne Rusbatch/Tabrez Hussain/Waheed Alam/Claire McWatt/Clare Harris/Diana Salmon
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	For issuing and processing Penalty Charge Notices; Croydon Back Office ICT Provider (currently Conduent) Croydon, Parking Services (data controller)
How will the access to this information be controlled?	Only the named officers making up the project team (6 members) will have access to the data entered into the online consultation on the Council website. With respect to the issuing and processing Penalty Charge Notices; Authorised access, secured by password protection
Is the data correctly managed to reduce the risk of collateral intrusion to the data subject?	Once downloaded from the online consultation platform, the data will be held on the councils servers in a folder that can only be accessed by the project team. The folder can only be accessed from a council laptop which is Bitlocker and password protected or via Office 365 requiring a password and access code. With respect to the issuing and processing Penalty Charge Notices; all officers with access to the data have had GDPR training and are aware of their responsibilities. Data is only disclosed to persons who have a legitimate reason to see it, such as the data subject, Enforcement Agencies collecting debt on our behalf or officers dealing with casework.
Are there adequate provisions in place to protect the information? If so what are they? <i>e.g. Process, security</i>	See above With respect to the issuing and processing Penalty Charge Notices; security such as egress, SFTP, password protection. Access to back-office systems and portals are secured by password protection and are role specific.

5b Sharing

Who is the information shared with, why are we sharing the information with this organisation?	The information on objections and comments to the public notice is not to be shared with any third party. With respect to the issuing and processing Penalty Charge Notices;
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	<ul style="list-style-type: none">• London Tribunals - Environment and Traffic Adjudicators. Statutory function to rule on Appeals against PCNs made by Keepers and are in place instead of the Court System now that parking and traffic contraventions are decriminalised. The Council is obliged to submit a copy of the evidence it is relying on to prove the contravention for consideration by the Traffic & Parking Adjudicator (also sent to the Appellant).• Traffic Enforcement Centre (Northampton County Court), in order to issue Warrants of Control and enforce non-payment of PCNs.• External Enforcement Agencies: In order to collect outstanding debt as in the process specified in the Traffic management Act 2004 and other parking legislation• Internal Enforcement Agency, Internal Debt Recovery Team, & Croydon Gateway: In order to collect outstanding debt as in the process specified in the Traffic Management Act 2004 and other parking legislation• Evidence may be provided to the Local Government Ombudsman following a complaint by the Registered Keeper.• The Registered keeper, who may request information from the council.• Council External Legal – should we need to defend claims.
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	<ul style="list-style-type: none"> • Back Office ICT provider when data is entered / uploaded onto the ICT system.
<p>What purpose does the information we are sharing have to the third party?</p> <ul style="list-style-type: none"> • <i>Ensure that we only share relevant information and not excessively</i> 	<p>N/A for the statutory consultation With respect to the issuing and processing Penalty Charge Notices; please see box above, listing the third parties, and the purposes for which they are expected to use the shared information.</p> <p>Information needed in order to issue Warrants of Control and for the Council to fulfil its obligations under parking legislation</p>
<p>Who will have access to the information, externally?</p> <ul style="list-style-type: none"> • <i>Include approximate number of users</i> • <i>Describe any sharing arrangements and what the level of access is. It may help to produce a diagram to show the data flows.</i> 	<p>No one with respect to the statutory consultation. For issuing and processing Penalty Charge Notices only those who have a legitimate need & under parking legislation.</p> <ul style="list-style-type: none"> • LGO • London Tribunals • External Enforcement Agencies Data (information) is uploaded by Croydon onto a secure portal, which is accessed by the agencies • ICT Provider
<p>How will it be transmitted to third parties and when? How often?</p>	<p>For issuing and processing Penalty Charge Notices only when required, this will depend upon the steps taken or not taken by the Registered Keeper. This will be by uploading onto a secure portal, electronically by SFTP, and by post. Where e-mail is used by Enforcement Agencies use e-mail to pass data back to the Council, this is required to be secured by Egress. Where the Council needs to transmit data by e-mail, this will be encrypted using the functionality available in the on-line version of Outlook. Moving forward, the Council is changing to Microsoft OME (encrypted</p>

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	<p>email) service (estimated end of April / May) this will allow the whole council to use encrypted email.</p>
<p>Is there a data sharing agreement in place?</p>	<p>For issuing and processing Penalty Charge Notices external Enforcement Agencies and ICT Supplier are contractually obliged to handle data securely. A data sharing agreement is included within these contracts and available on request. Additionally, the Council is required to comply with the DVLA's own data security requirements.</p>
<p>At what stage will the information be transferred?</p>	<p>For issuing and processing Penalty Charge Notices only at the appropriate point in the PCN Processing Cycle – When dealing with an Appeal, following the issue of Warrants of Control, following authorisation from Northampton County Court (TEC), or when there is a legitimate need to do so e.g., following a complaint to the LGO.</p>

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5c Identified Risks and assessment:

You should take into account the sensitivity of the information and potential harm that inappropriate disclosure or use of the information could cause to any individuals concerned. You should also consider the reputational loss to the Council and the potential for financial penalties being imposed by the ICO.

To assess the level of risk you must consider both the **likelihood** and the **severity** of any impact on individuals. A high risk could result from either a high probability of some harm or a lower possibility of serious harm.

The severity impact level and likelihood should be scored on a scale of 1 to 10 with 1 being low severity and 10 high. The two scores should be **added** together. The RAG status is derived from the following scale:

Score:

- 15 to 20 = Red (High)
- 8 to 14 = Amber (Medium)
- Below 8 = Green (Low)

To be completed by Project Sponsor

Risk Identified	Severity of Impact	Likelihood of harm	Overall RAG rating
Statutory Cosultation: Information being lost or stolen which leads to views expressed from an individual household becoming public. This carries risk to members of the individual household, reputational risk to the Council potential financial penalty	3	1	4 (Low)
Information being lost or stolen which leads to special category data from an individual household becoming public. This carries risk to members of the individual household, reputational risk to the Council potential financial penalty	0	0	0
Process personal data without providing a privacy notice directly to the individual leading to reputational risk and potential financial penalty. Please note that respondents objecting and commenting on the experimental School Street schemes will be informed that their personal data will only be used for the	9	1	10 (Medium)

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purpose of the statutory consultation process and information destroyed once this exercise is completed.			
Issuing and processing Penalty Charge Notices: Data sent to Enforcement Agency back-office system by Parking Services is inappropriately accessed by Enforcement Agency staff. Regular training will reduce the likelihood of this occurring.	7	1	8
Data held on the back-office system is inappropriately accessed by council staff. Regular training will reduce the likelihood of this occurring.	7	1	8
Information is disclosed by Enforcement Agency staff to someone other than the Registered Keeper. This would be a data breach that would be required to be disclosed to the Council's Data Protection Officer.	7	3	10
Information is disclosed by council staff to someone other than the Registered Keeper. This would be a data breach that would be required to be disclosed to the Council's Data Protection Officer.	7	3	10
Potential Data loss during storage by Enforcement Agency.	7	1	8
Risk of Misuse of Information by Enforcement Agency	7	1	8
Risk of Misuse of Information by Council Staff	7	1	8
Risk of accidental data loss by documents being sent to someone other than the intended recipient. This would be a data breach that would be required to be disclosed to the Council's Data Protection Officer.	7	3	10

6 Identify measures put in place to reduce risk.

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You must now identify additional measures you could take to reduce or eliminate any risk identified as medium or high risk in step 5.

To be completed by the Project Sponsor

Risk Identified	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
Process personal data without providing a privacy notice directly to the individual leading to reputational risk and potential financial penalty	Linked provide in the online survey to the privacy notice when/where respondents are asked to consent to us holding their information	Eliminates	Removed	Yes

LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	27 SEPTEMBER 2023	
REPORT TITLE:	Equality Annual Report 2023	
CORPORATE DIRECTOR / DIRECTOR:	Katherine Kerswell, Chief Executive David Courcoux, Director of Policy, Programmes & Performance	
LEAD OFFICER:	Denise McCausland, Equalities Programme Manager	
LEAD MEMBER:	Jason Perry, Mayor of Croydon Councillor Andy Stranack, Cabinet Member for Communities and Culture	
KEY DECISION?	No	
WARDS AFFECTED:	All	

1 SUMMARY OF REPORT

- 1.1 The Equality Annual Report attached to this report sets out a summary of progress made against each outcome in the Equality Strategy 2020-2024, as well as key challenges facing the organisation.
- 1.2 The adoption of the George Floyd Race Matters Pledge and the Croydon Equality Pledge have introduced new areas of focus for our equalities work; a new People and Cultural Transformation Strategy has been agreed, including a pillar of work focused on “building an equality driven, diverse and inclusive workplace.” and the Council has also participated as a pilot organisation on the Chief Executives London Committee (CELC) Tackling Racial Inequality (TRI) Programme.

2 RECOMMENDATIONS

For the reasons set out in the report and its appendices, the Executive Mayor in Cabinet is recommended:

- 2.1 to note the Equality Annual Report 2023 (Appendix A).

3 REASONS FOR RECOMMENDATIONS

- 3.1 Publication of the Equality Annual Report 2023 complies with the Council's legal requirement to publish information annually to demonstrate its compliance with the Public Sector Equality Duty. The Annual Report also demonstrates the Council's

progress delivering the Equality Strategy 2020-2024 and its commitment to building a fairer, more equal borough for all our residents.

4 BACKGROUND

Statutory obligations

4.1 Section 149 of the Equality Act 2010 (the Act) contains the Public Sector Equality Duty (PSED). The duty applies to public bodies and others carrying out public functions. The general equality duty requires the Council, in the exercise of functions, to have “due regard” to the need to:

- Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it.
- Foster good relations between people who share a relevant protected characteristic and those who do not share it.
- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act.

4.2 In addition, the Council is required to publish one or more objectives it thinks it should achieve to comply with the general duty.

4.3 The Council meets this duty through the adoption and delivery of its Equality Strategy. The current strategy was adopted by Cabinet and Council in early 2021 and runs until 2024. It sets out the Council’s equality objectives and the associated actions it will take, both as an employer and a community leader, to meet the PSED and improve equality outcomes. A version of this strategy, updated for 2023-2027, is due for consideration by Council in October 2023, subject to Cabinet approval.

4.4 The Equality Annual Report at Appendix A sets out the Council’s progress against the strategy and equality objectives and highlights challenges against each of the strategy’s four Outcome areas. There has been significant activity over the past year, including:

- Launch of Equalities Pledge in March 2022 and George Floyd Race Matters Pledge in May 2022; so far 37 organisations have signed up for the pledges in total:
 - 19 - George Floyd Race Matters Pledge.
 - 18 - Equalities Pledge.
 - 6 – signed both the Equalities Pledge and George Floyd Race Matters Pledge.
- Designation of Croydon Council as a Spotlight Organisation for Race Equality Week 2022 and 2023.
- Bronze Trailbreaker Award for Tea Breaks from Race Equality Matters – November 2022.
- Pay gaps below London averages; zero pay gap for gender.
- Piloted Chief Executives London Committee (CELC) Tackling Racial Inequality peer review programme.
- Inclusion of gender and anti-racism in equality impact assessments.

- Establishment of new staff networks: Christian Staff Network and Young Professionals Staff network.
- Equality and Human Rights Commission invitation to be a case study for their Public Sector Equality Duty Specific Duties monitoring project.

Chief Executives London Committee Tackling Racial Inequality Programme

- 4.5** The Council's decision in February 2023 to be a pilot organisation in the Chief Executives London Committee (CELC) Tackling Racial Inequality (TRI) Programme was in line with the organisational priority to work towards becoming an anti-racist organisation, agreed in the George Floyd Race Matters Pledge. One of 12 authorities taking part, the Council agreed to undergo a three-council peer assessment with LB Ealing and LB Hackney. The peer assessments took place during May and have provided valuable feedback on improvements and good practice. The findings will be presented to the EDI Board in October for consideration.
- 4.6** The Council ceased its membership of all equality organisations in 2020, as part of its measures to reduce expenditure because balancing the books continues to be a core priority. At the same time, it developed a relationship with Race Equality Matters, a London based charity that supports organisations to develop solutions to address race inequality at work at no cost to the Council. This partnership has led to the implementation of several solutions, such as Tea Breaks and Safe Spaces for other protected characteristics, including the Women's Network and LGBT+ Network. The Tea Breaks programme provides an opportunity for staff network groups to meet the Corporate Management Team, senior leaders and other interested staff members to discuss topics which impact on their lived experience at work. Tea breaks have been broadly based around the staff network groups, however other topics have been included for example, though there is no recognised Men's Staff Network Group, a Men's Tea Break session in January 2023 focused on Men's mental health.
- 4.7** In November 2022, the Council received a Bronze Trailblazer award from Race Equality Matters for implementing the Tea break programme and other race equality initiatives. In February 2023, the Council was a [spotlight organisation](#) during Race Equality Week for the second consecutive year.
- 4.8** The authority has benefitted from Race Equality Matters solutions at zero cost. This contrasts with organisations concerned with other protected characteristics that charge membership fees. However, officers and staff network members utilise cost free webinars where possible to develop knowledge and skills in topics such as neurodiversity. The Council works on the principle that people are intersectional and have multiple characteristics. Initiatives developed for one protected characteristic will benefit the whole workplace in respect of improving management practices and workplace culture. While it would be preferable to undertake more initiatives for more people, resources and capacity are limited to two full time posts.

5 ALTERNATIVE OPTIONS CONSIDERED

- 5.1** None. The Council has a legal obligation to publish information to demonstrate its compliance with the Public Sector Equality Duty, as set out in the Equality Act 2010.

6. CONTRIBUTION TO COUNCIL PRIORITIES

- 6.1** The Equality Strategy supports two priorities under Outcome 1 of the Mayor's Business Plan 2022-26:
- Become a council which listens to, respects and works in partnership with Croydon's diverse communities and businesses.
 - Develop our workforce to deliver in a manner that respects the diversity of our communities.

7. IMPLICATIONS

7.1 FINANCIAL IMPLICATIONS

7.1.1 There are no direct financial implications arising from the Equality Annual Report 2023.

7.1.2 Comments approved by Lesley Shields, Head of Finance for Assistant Chief Executive and Resources on behalf of the Director of Finance. 17/08/23.

7.2 LEGAL IMPLICATIONS

7.2.1 The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017 sets out that the Council must publish information to demonstrate its compliance with the duty imposed by section 149(1) of the Equality Act 2010, not later than 30 March 2018; and subsequently at intervals of not greater than one year beginning with the date of last publication. The information which the Council publishes must include, in particular, information relating to persons who share a relevant protected characteristic who are—

- a) its employees;
- b) other persons affected by its policies and practices.

7.2.2 Section 149(1) (a) to (c) sets out the public sector equality duty with which the Council is required to comply. A public authority must, in the exercise of its functions, have due regard to the need to—

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

7.2.3 In addition, the Council is required to publish one or more objectives it thinks it should achieve to do any of the things mentioned in paragraphs (a) to (c) of subsection (1) of section 149 of the Act referenced above.

7.2.4 An objective published by a public authority in compliance with paragraph (1) must be specific and measurable and must be published in such a manner that the information is accessible to the public.

7.2.5 The report and recommendations represent the Council's annual report against our equality objectives which seek to demonstrate compliance with the Council's equalities obligations.

7.2.6 Comments approved by the Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer. (Date 11/08/2023)

OTHER IMPLICATIONS

7.3 HUMAN RESOURCES IMPACT

7.3.1 Equality is integral to our workforce processes, policies and practices, including becoming an employer of choice. We continue to make positive progress towards having a workforce that reflects its community and where inclusivity is embedded in our practice, though it is recognised that there is more to do.

7.3.2 Approved by: Gillian Bevan, Head of HR, Resources and Assistant Chief Executives Directorates on behalf of Dean Shoemith, Chief People Officer. (Date 10/08/2023)

8 APPENDICES

8.1 A. *Equality Annual Report 2023*

9 BACKGROUND DOCUMENTS

9.1 None.

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EQUALITY ANNUAL REPORT 2023

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FOREWORD

As the Cabinet Member for Communities and Culture, my remit includes introducing the annual progress report on the Council's Equality Strategy 2020-2024.

Our objectives are now informed by priorities in the Mayor's Business Plan 2022-2026, adopted in December 2022. The first is our key priority:

- 1) The Council balances its books, listens to residents and delivers good, sustainable services.

Fulfilment of this main outcome is essential to enable us to achieve the subsequent four outcomes of the Business Plan:

- 2) Croydon is a place of opportunity for business, earning and learning.
- 3) Children and Young People in Croydon have the chance to thrive, learn and fulfil their potential.
- 4) Croydon is a cleaner, safer and healthier place, a borough we're proud to call home.
- 5) People can lead healthier and independent lives for longer.

The Equality Strategy 2020–2024 was developed during the coronavirus pandemic. It was also a time of significant financial and organisational challenge for the council, its employees and residents. The following years have also been difficult for many, with the cost-of-living crisis having a negative impact on many people in Croydon and throughout the UK, including those with protected characteristics.

This year we have been updating the Equality Strategy to extend its term to 2027 and will submit it to Council in October 2023. However, the narrative of the Equality Annual Report 2023 is solely focused on our progress in implementing the Equality Strategy 2020-2024.

Our focus is on improving the lived experience of our employees and residents and those who work and visit the borough. During 2020 we committed to co create two equality pledges to support our equality aims. We held two public consultations in 2021 and developed Croydon's Equality Pledge and the George Floyd Race Matters Pledge, launched in March and May 2022. We have chosen three priorities in each pledge to work towards in each year. We will provide an update on our progress along with the numbers of community pledge partners that have adopted the pledges and the work that they are carrying out to make the borough both fairer and safer for everyone.

The report reflects external partnerships which have positively impacted on our plans. The Chief Executives of London Councils (CELC) have created an anti-racist standard with an anti-racist statement that all participating London councils are requested to adopt. This standard is designed to create systemic change across London through the Tackling Racial Inequalities (TRI) Programme. In February 2023, we joined the pilot programme as one of 12 London councils. During 2023 we have undertaken both self-assessment and peer assessment with two other London boroughs to improve our practice and create systemic change. One of the key reasons that we embarked on the programme was to improve our engagement with the community. We had identified this as a development area and will use the standard to improve our performance. These plans will help to create a better working environment for all people with protected characteristics and make Croydon a fairer and safer borough for our residents and visitors and bring focus to our work to embed equality, inclusion and anti-racism into both the organisation and the borough itself.

One of our objectives in our equality strategy is to increase the use of data in our decision making. This is a core objective which puts our community at the heart of what we do. This objective will be supported in our future plans by the

data from Census 2021 which demonstrates our demographic growth and the diversity of our borough which makes it a great place to live, visit and work for many people. We have made huge efforts in this area and will update on our progress. We have developed a new Equality Impact Assessment template (EQIA) which we will launch during 2023. We have made improvements within the template that place listening to residents as a key results area. Our aim in this is to improve the quality of our decision making ensuring that residents are at the heart of this.

We appreciate the work undertaken by our staff and Staff Network groups under the most challenging circumstances to deliver services that are responsive to the needs of our residents. This report also contains details of work that we are doing to enable talent to flourish for all staff and includes positive action initiatives that we are developing for racialised and minoritized staff, giving people the opportunity to learn whilst working. We are taking active steps to demonstrate to staff that they are valued, and we are seeking to provide an environment that is conducive to their health and wellbeing. We believe that this in turn will improve the service delivered to our residents. We will support staff to manage their wellbeing through our Employee Assistance Programme which apart from counselling support has a wide range of useful tools and publications. We also have regular mindfulness sessions, delivered voluntarily by a member of our OD and Learning team and a Health and Wellbeing Group, chaired by our Chief People Officer. We are taking steps to show recognition for our staff and have developed a system of “shout outs” for outstanding performance which are published in the Chief Executive’s weekly newsletter.

We have made a huge cultural change in the language that we use to describe staff previously known as BAME. We listened to the Race Equality Network (REN) who changed their name from the BAME network to the REN in 2021, they no longer affiliated with the term BAME. We

chose the terms Global Majority and racialised groups to replace BAME. We also used the term minoritized groups to describe people affected by structural and systemic inequality such as: disabled people, LGBT+, women and groups affected socio economically. We have socialised these terms in the organisation and are also socialising the terms with residents.

We are committed to making Croydon a place where people feel valued and can have a voice, and a place that is free from racism, xenophobia, Islamophobia and all other forms of discrimination.

Our key challenge as a council continues to be balancing the books. This has meant that our service directorates have been heavily focused on delivering services with reduced resource, along with continuing to identify savings. This means that our equality achievements are largely focused on outcome 1. We will aim, with the support of our equalities team, to support our service directorates in making further progress during the course of the strategy in its refreshed form.

Next steps:

We continue to ensure that we pay due regard to the Public Sector Equality Duties, advancing equality of opportunity, fostering good community relations and eliminating unlawful discrimination, harassment and victimisation. We will ensure that these are embedded in all council functions and are part of the decision-making process through consideration in reports and equality impact assessments. Whilst paying due regard we will strive to demonstrate best practice. Our aspirations are high; however, we recognise that this transition may take time in some areas.

Councillor Andy Stranack, Cabinet Member for Communities and Culture

OUTCOME ONE:

The Council addresses social inequities as a community leader and an employer

Significant progress has been made against Outcome one over the past twelve months with the council undertaking a number of high-profile initiatives to change culture embed a more holistic approach to equalities across the organisation. From the launch of the George Floyd Race Matters Pledge and the Croydon Equality Pledge to the piloting of the Chief Executives of London Councils (CELC) Tackling Racial Injustice programme and development of a refreshed Equality Strategy, there has been visible leadership from CMT and the new EDI Board to ensure equalities stays high on the agenda.

The new People and Cultural Transformation Strategy has also provided staff with a transparent framework for improvements in our offer to our employees and the cultural improvements the Council intends to make across the organisation.

Key achievements

Community Safety: Set up a new panel reflecting the diversity of the borough, and chaired by the community, to have oversight of all police encounters – stop and search, use of TAZER, police dogs, strip searches etc. as part of a police pilot programme.	Equality Pledges Launched Equalities Pledge and George Floyd Race Matters Pledge; 37 organisations have signed up in total so far.	Staff Network Groups Established two new staff network groups: the Christian Network and the Young Professionals Network.
Reputational Positivity Council designated a Spotlight Organisation for Race Equality Week 2022 and 2023 and awarded a Bronze Trailbreaker Award by Race Equality Matters for our Tea Talks programme and other race equality initiatives.	Reciprocal Mentoring Developing a new reciprocal mentoring programme pairing Global Majority staff with senior leaders in a two-way mentoring relationship.	People and Culture Strategy Developed a new People and Culture strategy to embed a positive culture to deliver our transformation, explicitly committing to building an equality driven, diverse and inclusive workplace.
Contracts and procurement: The Council's tender documents require contractors to demonstrate compliance through sharing their equalities policy in line with the Public Sector Equality Duty and KPIs being reworded to reflect the requirement.	Equality leadership and Governance The Equality, Diversity and Inclusion (EDI) Board has been established with senior representation to lead and drive the Council's equality activities and monitor the Equality strategy.	The Big Promise The Corporate Management Team made personal commitments to support the career development of Global Majority staff and that of other minoritized groups during Race Equality Week 2023.

<p>LGBT+ Language Guide</p> <p>Published a LGBT+ language guide in conjunction with the staff network, so staff can be clear on appropriate language and terms.</p>	<p>Leadership Development</p> <p>Launched a suite of positive action leadership programmes for the Global Majority and other minoritised employees, especially colleagues in entry / front line roles.</p>	<p>Improvement in closing gender, disability and ethnicity pay gaps</p> <p>The 2021 and 2022 gender pay gap figures were calculated as 0% with the disability pay gap at -1.2%(mean) and 0% (median). Whilst the ethnicity pay gap is higher and needs further targeted work to address, it remains below the London average.</p>
	<p>Borough of Culture</p> <p>Our Borough of Culture celebrations have shone a spotlight on Croydon as a diverse and inclusive place to live, work and visit.</p>	
<p>Challenges for the future:</p> <ul style="list-style-type: none"> - The scale of budget and service transformation facing Croydon will drive significant change in the coming years. Equalities considerations should be key during these changes to ensure services continue to deliver for all our residents. - Capacity will continue to be a challenge in the equalities team and across the organisation, this should be monitored to ensure ability to deliver. - Improvements have been made across the Council in terms of our collection and use of data, however this remains an area in need of development and standardisation. - Whilst the Council remains strong at assessing the impact of decisions against protected characteristic groups more work needs to be done to consider issues of intersectionality across different protected characteristic groups and to address the emergent EDI themes. - The refreshed Equalities Strategy, which is under development, will need to reflect the priorities of the Mayor's Business Plan and be embedded more effectively across the organisation, being integrated into service planning and personal objectives to increase ownership. - Continued progress should be made to ensure the Council's workforce reflects the community it serves, addressing the remaining ethnicity pay gaps, maintaining the zero pay gaps for race and gender and addressing underrepresentation at Grade 15 and over. <ul style="list-style-type: none"> o The Census showed Croydon's population as 48% White ethnic groups and 52% Global Majority ethnic groups. Currently 52% of staff are from White ethnic groups and 48% are from Global Majority ethnic groups. Within tiers 1-3, 73% of staff are from White ethnic groups with 27% from Global Majority ethnicities. o The percentage of Croydon residents with a disclosed disability is 14%, currently within the council 10% of the workforce have disclosed disabilities, with 12% of staff within tiers 1-3. 		

- The Census also shows the Croydon population to be 52% female and 48% male. Within the council workforce as of March 2023, 68% of staff are female and 32% of staff are male. At tiers 1-3 of the workforce 58% of staff are female with 42% being male. Local government is generally more represented by female staff. Croydon's figures are slightly higher than the London councils average.
- The council has a challenge relating to disability discrimination claims. This is being addressed through the creation of a central budget for reasonable adjustment as well as training and guidance for managers and should be closely monitored.

OUTCOME TWO:

We work with residents to better understand our communities.

Improving the collection of equality data is a key priority within the council, this ensures that the decisions that we make are based on good quality demographic and service user data along with sound local/national evidence. We are aiming to address the inconsistencies in data collection from directorates and ensure that all departments are using the latest Census data available. This means updating our IT systems in some areas along with a cultural change regarding custom and practice.

The Council already has strong examples of drawing on equality data insights to target services accordingly. The Housing Directorate has worked with those experiencing homelessness as part of the review of our homelessness front door and specifically engaged with Gypsy and Roma communities as part of a process to improve the Latham's Way traveller site.

The Community Safety team have also provided a lot of support to residents from minoritised groups including those with sensory needs, communication difficulties and Global Majority residents, some of whom do not have English as a first language.

Key achievements

PREVENT: Provided 1-2-1 support to reduce vulnerability and signposting to specialist services for support. The Prevent Education Officer delivers projects and workshops with students from schools within Croydon.	Availability of data Published detailed analysis of the 2021 Census on the Croydon Observatory website for use by our community, voluntary and faith sectors.	Cultural change - Language We adopted the terms: Global Majority, racialised groups and minoritized groups to replace BAME.
Accessibility Ran an Access Training Weekend for London Borough of Culture providing community event organisers with accessibility training worth over £300 per person.	Supporting rough sleepers Worked with partners to assist people experiencing homelessness, people with disabilities and people with communication impairments. There have been joint visits to sites with multiple agencies to support the rough sleepers into accommodation and to improve the safety of residents around the Borough.	Violence Reduction Network The Safer Croydon Partnership (SCP) has launched a new Community Safety Engagement Board (CSEB) to listen to and collaborate with residents and community groups on community safety initiatives.

<p>Violence Reduction Network</p> <p>Developed new terms of reference for the Borough's Safer Neighbourhood Board including mandated reserved board seats for Global Majority (Black and South Asian communities respectively), LGBTQ+, people with disabilities, and people of faith.</p>	<p>Data Collection:</p> <p>Council tax and benefits now have a new form provider since autumn of 2022 and going forwards an optional equalities form is incorporated in every new form we put on our website.</p>	<p>Accessibility</p> <p>Reduced rehab service waiting lists and exploring apprenticeship opportunities for young people to train as rehab workers.</p>
	<p>Data Collection</p> <p>Housing is implementing a new NEC Housing Management system which will replace a number of different systems and improve data collection and data quality.</p>	

<p>Challenges for the future:</p> <ul style="list-style-type: none"> - The Council will need to continue to analyse and share the outputs of the 2021 Census to ensure decision making both inside and outside the council is based on the fullest and most up to date analysis of the borough's demographic data. - Improving our collection of equality data will continue to be a key challenge over the next few years. This includes consistency of data collection across directorates given the multiple access points into the council. - To ensure that we are delivering services that meet the needs of all residents we will explore new opportunities to ask residents to share their data regarding their equality characteristics when they contact the council. This is so we can measure both who uses our services and how they perceive the effectiveness of the service. We appreciate that not all residents will be comfortable with this and we will need to build trust to ensure cooperation from our residents. - We will also continue to improve our engagement with minoritized groups including: Gypsy, Roma and Traveller communities, disabled people including those with communication difficulties, homeless people, asylum seekers, refugees and the LGBTQ+ community.

OUTCOME THREE:

Use partnerships to improve access and meet individual needs as they arise

Building closer partnerships with our community organisations, businesses and other public sector bodies is vital to delivering services which meet our communities' needs, particularly in a period of significant change for the Council.

We continue to build on our work supporting young people and adults gain employment and educational attainment through our partnerships with schools, colleges and others. We continue to promote the Good Works standard and support young people who are not in education, employment or training and those that have been excluded from school.

Key achievements

<p>Access to Education</p> <p>The NEET team in education has supported 68 young people into education or employment or training in this financial year so far, significantly higher than at the same point last year. In 2022/23, 104 were supported; and in 2021/22, 141.</p> <p>Depending on a young person's chosen pathway (education, employment or training), the caseworker supports them to achieve their objective, including through referral to a provider, support service or voluntary organisations, support with an application, interview preparation, information and advice.</p>	<p>Access to Education</p> <p>Introduced a new participation team in to ensure the voices of children and family are heard throughout the work of the Children, Young People and Education directorate.</p>	<p>Employment & Skills</p> <p>Enrolled 4,296 learners on 6,849 courses through CALAT with:</p> <ul style="list-style-type: none"> • 78% of CALAT learners from Global Majority. • 51% of CALAT learners live in areas that fall within the 30% most disadvantaged areas in the country. • 14% of learners declare a learning difficulty or disability. • 91% of learners are in receipt of a means tested benefit. • 55% of learners progressing onto further courses.
<p>Exclusions</p> <p>Permanent exclusions are reducing (though still with disproportionality among specific groups) with targeted interventions, in partnership with schools, to address overrepresentation of some groups in exclusions.</p>	<p>Employment & Skills</p> <p>324 employers in Croydon have adopted the Good Work Standard.</p>	<p>Access to Employment</p> <p>A corporate parenting strategy and a participant strategy are in development for completion in 2023.</p> <p>Working groups have been set up to capture child parent voices within our child parent voices within our practice system.</p>

<p>Council Tax</p> <p>Supported 676 residents to access the governments Energy Rebate scheme through targeted phone calls to those who would otherwise not have been able to complete the online process.</p>	<p>Employment & Skills</p> <p>Supported 1,423 residents into employment, education and training through Croydon Works in 2022.</p>	<p>Improving accessibility</p> <p>Provided tailored large print, braille or translated documents and council tax bills to support residents' accessibility. For example, using translation services 230 times to support Family Justice Service cases.</p>
<p>Community Safety</p> <p>Introduced regular Cabinet and Senior Officer representation at both the Re-New Addington and MyEnds Community Groups.</p>	<p>Community Safety</p> <p>Developed a specific fund to enable Voluntary and Faith Sector Groups to mentor young people in hot spot areas impacted by high levels of violent youth crime.</p>	
<p>Challenges for the future:</p> <ul style="list-style-type: none"> - As we move towards more digital access to services the Council also needs to ensure it continues to provide a service for those residents who are digitally excluded. This could be through the call centre open from 9am to 4pm Monday to Friday, alternative access options or in some cases home visits to assist with access to Croydon services. - Despite progress, exclusion rates are significantly higher this year than last year nationally. There has been an increase in exclusions at primary age - 8 from Croydon schools (6 Croydon resident children) this year, compared to 0 in the previous 2 years. This follows statistical, local and national trends and is still lower than average. Secondary exclusions have also increased. This should be monitored and addressed as we continue to address the challenge of disproportionality in education attainment, exclusions and attendance in some groups. - Managing safeguarding issues such as sexual harm against young women and girls and the adultification of African and African Caribbean pupils in schools remains a challenge for focus including through partnership working with the police, building on the anti-racist practice and commitments adopted by the Council. 		

OUTCOME FOUR:

People in Croydon are supported to be in good health

Over the past year the Council has continued to work closely with the local NHS and partners to support and improve the health of all parts of our diverse community. The establishment of a new joint Council/NHS Health and Care Board has helped to ensure that there is closer working between the two bodies which will help to increase service coordination and initiatives to improve health and reduce health inequalities.

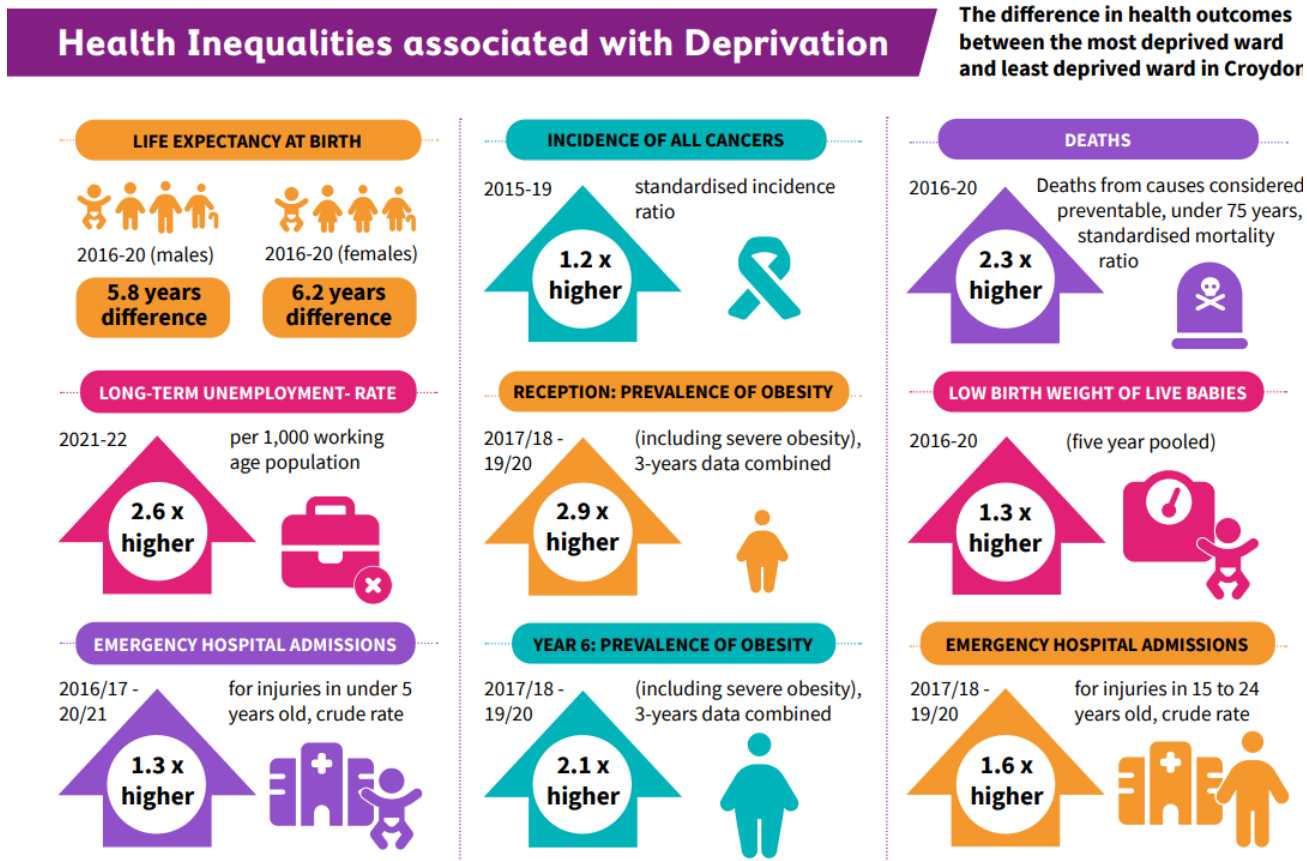
Like many London Boroughs there remain stark health inequalities in Croydon not least of all the lowest healthy life expectancy (63.2 years) in Southwest London. This was highlighted as the focus of last year's Director of Public Health report which set out recommendations to reduce inequalities within Croydon. By working closely with our partners, we will recognise and address health inequalities, including those which have been exacerbated by the Covid-19 pandemic, for example mental health and loneliness.

Key achievements

<p>Local Community Partnerships (LCPs)</p> <p>Supported the development of six LCPs working with and health partners and voluntary sector groups. Each LCP has an independent chair, have developed localised commissioning plans and have funding available.</p>	<p>Launched new Health and Care Board</p> <p>Launched a new joint NHS and Council Health and Care Board to better coordinate improvements to health and care services for residents across Croydon.</p>	<p>Supporting Asylum seekers placed in Croydon</p> <p>Worked with community and NHS partners to ensure asylum seekers placed in Croydon are supported to access health and other services.</p>
<p>Health Inequalities</p> <p>Secured £150k funding from Southwest London Integrated Care System to fund projects on tackling health inequalities through Croydon Voluntary Action, Croydon Asian Resource Centre and the Croydon BME forum.</p>	<p>Occupational therapy improvements</p> <p>Utilising an Innovation Fund grant, analysed Occupational Therapists waiting lists and introduced improvements to reduce the backlog. Of the cases addressed in this project, 24% were able to be resolved and closed without ongoing intervention.</p>	<p>Resident voices model</p> <p>Developed a core group of residents with lived experience to support and challenge the delivery of the Adult Social Care and Health Strategy, and the Croydon Health and Care Plan.</p>
<p>Coproduction with residents</p> <p>Began projects to co-produce service improvements with our residents who live in Shared Lives placements or access Active Lives services.</p>	<p>New Framework</p> <p>Croydon Health Inequalities Outcomes Framework produced to help measure community health on an ongoing basis including consideration of health inequalities for those with particular characteristics.</p>	<p>Autism Strategy</p> <p>Progress to deliver Croydon's Autism Strategy including training all JobCentre Plus staff on Autism Understanding.</p>

Challenges for the future:

- Improving health outcomes in Croydon requires a partnership approach between all council departments, the NHS and voluntary sector partners. The closer working practices established over recent years should continue to be developed to deliver positive improvements for residents.
- Whilst Croydon has the highest number of young people in London it also has a significant aging population and the largest Care Home provision within London with 128 registered care homes and 3,000 beds.
- The 2022 Director of Public Health 'Health Inequalities in Croydon' report sets out a stark reminder of the health inequalities which exist within Croydon as set out in the following infographic. The council and partners must work over coming years to tackle the root causes of these inequalities.



Croydon's Equality Pledges

Our Pledges have been created so that organisations can reinforce the borough's commitment to treat everyone equally and fairly and giving them the freedom to be who they are.

Croydon's Equalities Pledge

1. Positively promote the equality of opportunity for individuals of all characteristics namely: disability, gender, race, age, sexual orientation, religion and belief, marriage and civil partnership and gender identity, by recognising significant celebrations and awareness days and ensuring that workplace practices do not discriminate against any groups.
2. Ensure that there is mandatory training for all staff at all levels in equality, diversity and inclusion every two years, attendance is monitored, and 100% targets set with staff and managers held to account.
3. Ensure a zero-tolerance approach to all forms of discrimination, harassment and bullying, publicising the staff code of conduct, providing staff with information on what it is and encouraging people to safely challenge this where it occurs ensuring that people are not treated less favourably for doing so.
4. Positively encourage applications from diverse and under-represented groups when advertising for posts and taking actions to respond to under representation in this area identified by organisational data.
5. Use anonymous recruitment processes which don't reveal details of race, age, gender, disability or socio-economic status.
6. Identify and annually publish pay gaps based on ethnicity, disability and gender and putting actions in place to reduce such pay gaps.
7. Provide reasonable adjustments for disabled staff in interviews and employment.
8. Develop and agree an equality policy for the organisation which all staff sign up to and review it every 3 years.
9. Collect data on the protected characteristics of staff and aiming to have a workforce which reflects the Croydon community by using positive action recruitment practices and encourage career development for underrepresented staff.
10. Undertake annual staff surveys to identify the impact of organisational actions on employees lived experience and psychological safety at work.

George Floyd Race Matters Pledge

1. We are working to become an anti-racist organisation by embedding this in our strategies, actions and behaviours and by making a difference to the lived experience of our communities.
2. Committing to zero tolerance of racism from employees, residents, customers and service users by challenging racist behaviour or stereotypes expressed by individuals.
3. Developing our knowledge of anti-racist practice by listening and responding to experiences of staff and the wider community.
4. Developing an understanding of the role that power, privilege, identity and disadvantage that impacts on the lived experience of all staff in particular those from African/African Caribbean, other African heritage communities.

5. Undertaking whole workforce training on unconscious bias and encouraging staff to safely challenge such bias during day to day conversations.
6. Developing cultural awareness by learning more about African/African Caribbean and African other history and cultural practices to develop understanding of staff and customers through podcasts, videos, documentaries and by attending events.
7. Promoting good relationships between groups which share cultural similarities and those that don't by encouraging communities to celebrate together as one.
8. Identifying and addressing any ethnicity pay gaps.
9. Ensuring that recruitment processes from application, shortlisting, interview and appointment conducted in a manner that facilitates positive action in recruitment such as media campaigns, advertising imagery and interview panels that represent the diversity of the borough's population where possible.
10. Developing plans to address challenges where race may not be the only factor and the needs of people may also be in relation to: disability, age, sexual orientation, sex or other protected characteristics.

Croydon's Leadership Commitment: The Big Promise

Mayor Jason Perry, Executive Mayor of Croydon

My promise is to continue working with our diverse communities here in Croydon, celebrating our differences, recognising that the things that make us different also make us great.

Katherine Kerswell, Chief Executive

My big promise is to mould the culture of the council so that Global Majority staff feel safe to come forward for personal development and opportunities and be able to trust in the process, to proactively encourage them to do so and play my full part in a mentoring and reverse mentoring programme.

To lead CMT to constantly being open and listening to the voice of staff and residents, building a richer understanding of the lived experience of staff and residents and to help build that beacon of light of anti-racism and be fully committed to Croydon Council becoming an anti-racist organisation.

Elaine Jackson, Assistant Chief Executive

I want to continue pushing myself and my team to have the uncomfortable conversations.

In addition, I want to seek support from my CMT colleagues for a breakthrough programme for minoritized colleagues.

NHS/Council as the two largest employers in the Borough are about to embark on some work to see how we can address workforce opportunities and challenges and I have already spoken to health today about the work we have been doing this week and how we must ensure that within the scope of this work EDI will be a key driver.

Jane West, Corporate Director of Resources

My individual promise will be to keep the Race Equality agenda under discussion all year round, promoting continuous learning.

Debbie Jones, Corporate Director of Children, Young People and Education

To confront racism in both my personal and professional life using my ears to listen; my eyes to see and my voice to protest, learn, influence and support in my role as a Director of Children's Services here in Croydon.

Within my DMT we have resolved to revive our Race Equality Board that spearheaded many of the changes and focus we now see within the Local Authority. However, it is now time to refresh and refocus our energies using the wisdom and lived experiences of our staff to deliver on our promises to create more 'safe space' and to provide opportunities and to understand and confront the blockers that still remain.

Annette McPartland, Corporate Director of Adult Health and Social Care

Rather than just talk about race inequality, I want to ensure I live by guiding principles including:

- Being anti-racist. I pledge that I will be vocal about racism/micro-aggressions and challenge those that demonstrate that behaviour/beliefs.
- I will be brave and respectful. I will listen and learn.
- I will, in my role as corporate director of adult social care and health, actively support and promote talent across the council.
- My DMT has committed to supporting our talent with career progression and I will actively be a fully committed to mentoring and our reverse mentoring programme.

Susmita Sen, Corporate Director of Housing

My individual promise is to actively support and promote the talent of our global majority staff in the workplace, but especially in Housing where we do need to see our talented staff encouraged to rise through the ranks and become our future leaders whether that it's non-executive or executive positions.'

DMT have committed to create a safe space for an honest conversation about race equality and how we can best support our talent at all levels. We will challenge inequality and behaviours that reinforce inequality at all levels whether conscious or unconscious throughout Housing.

Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration and Economic Recovery

My individual promise is to actively nurture and support global majority talent within SCRER and across the council with career progression and development. Both each member of the SCRER DMT and I are committed to supporting our talent with career progression and rising through the organisation and we have each committed to taking part in mentoring and reverse mentoring.

I am also committing to establishing an Equalities Board for SCRER which will identify and lead action across the directorate to improve equalities and diversity.

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LONDON BOROUGH OF CROYDON

REPORT:	CABINET
DATE OF DECISION	27 SEPTEMBER 2023
REPORT TITLE:	Refreshed Croydon Equality Strategy 2023-27
CORPORATE DIRECTOR / DIRECTOR:	Katherine Kerswell, Chief Executive David Courcoux, Director of Policy, Programmes & Performance
LEAD OFFICER:	Denise McCausland, Equalities Programme Manager
LEAD MEMBER:	Jason Perry, Executive Mayor of Croydon Councillor Andy Stranack, Cabinet Member for Communities and Culture
KEY DECISION?	No
WARDS AFFECTED:	All

1 SUMMARY OF REPORT

- 1.1** In early 2021 the Council adopted a new Equality Strategy which it was anticipated would run to 2024. The Strategy was adopted amid a period of dramatic change, with the Covid-19 Pandemic still affecting local communities and resulting in long-term changes to working practices, and the Council undergoing significant transformation following the 2020 Report in the Public Interest.
- 1.2** This Equality Strategy, refreshed for 2023-2027, seeks to build on the foundations of the 2020-2024 Strategy, reflect the results of those changes and embed the initiatives the Council has introduced since 2021. For example, the adoption of the George Floyd Race Matters Pledge and the Croydon Equality Pledge have introduced new areas of focus for our equalities work; a new People and Cultural Transformation Strategy has been agreed, including a pillar of work focused on “building an equality driven, diverse and inclusive workplace;” and the Council has also participated as a pilot organisation on the Chief Executives London Committee (CELC) Tackling Racial Inequality Programme. Each of these initiatives and others have been incorporated in the refreshed Strategy, which has also been aligned with the Executive Mayor’s Business Plan, adopted by Council in 2022.
- 1.3** Following feedback from the Executive Mayor, Cabinet Member, Equality Diversity and Inclusion Board and Scrutiny Committee, the format of the Strategy has been updated to reduce duplication and focus on actions and measurable outcomes wherever possible. The four outcomes of the original strategy have been reduced to three and the objectives redistributed between the remaining outcomes. It is primarily the actions,

performance measures and narrative sections which have been updated. In addition, there are slight amendments to Outcome 3 (formerly Outcome 4) to better reflect the Council's responsibilities for health and social care, and two additional objectives under Outcome 1 have been added, to deepen accountability and effect systemic change within the authority, and reflect its work to become an anti-racist organisation.

- 1.4** The original Strategy was based on 2011 Census data as this was the latest available at the time of adoption. The refresh uses data from the 2021 Census, giving a more accurate picture of the challenges in Croydon.
- 1.5** As part of the CELC Tackling Racial Inequality (TRI) programme, each council is requested to adopt the London Local Government Anti-Racism Statement, developed by the CELC, to declare its commitment to achieving racial equality. The purpose is to ensure a consistent approach, underpinned by CELC TRI standards, to drive systemic cultural change across London councils. The standards also require that each council appoint a Senior Responsible Officer (SRO) for race from both the organisational and political leadership. This report proposes formally adopting the CELC TRI and nominating the Chief Executive as the internal SRO and the Executive Mayor as the political lead.

2 RECOMMENDATIONS

For the reasons set out in the report and its appendices, the Executive Mayor in Cabinet is recommended:

- 2.1** to agree the refreshed Equality Strategy 2023-2027 (Appendix A) and the updated Equality Objectives at paragraph 4.11 and refer them to Full Council with a recommendation for approval.
- 2.2** to adopt the London Local Government Anti-Racism Statement, developed by the London Councils Chief Executives London Committee (Appendix B), and refer it to Full Council for noting.
- 2.3** to appoint the Executive Mayor as the political lead, and the Chief Executive as the Senior Responsible Officer, for race.
- 2.4** to delegate to the co-chairs of the Council's Equality, Diversity and Inclusion Board (or any successor board), in consultation with the Executive Mayor and Cabinet Member for Culture and Communities, the authority to approve and monitor the delivery plan for the refreshed Equality Strategy once adopted.

3 REASONS FOR RECOMMENDATIONS

- 3.1** Adoption of the updated Equality Objectives, incorporated in the refreshed Equality Strategy 2023-2027, complies with the Council legal requirement to publish its equality objectives every four years.

- 3.2 Adoption of the [London Local Government Anti-Racism Statement](#) and appointment of a Senior Responsible Officer and political lead for race will ensure that the Council goes beyond compliance, taking a systemic approach to equality and inclusion and working in line with the [CELC Tackling Racial Inequality Standards](#) to become an anti-racist organisation.

4 BACKGROUND

Statutory obligations

- 4.1 Section 149 of the Equality Act 2010 (the Act) contains the Public Sector Equality Duty (PSED). The duty applies to public bodies and others carrying out public functions. The general equality duty requires the Council, in the exercise of functions, to have “due regard” to the need to:
- Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it.
 - Foster good relations between people who share a relevant protected characteristic and those who do not share it.
 - Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- 4.2 In addition, the Council is required to publish one or more objectives it thinks it should achieve to comply with the general duty.
- 4.3 The Council meets this duty through the adoption and delivery of its Equality Strategy. This refreshed Equality Strategy sets out the Council’s intended equality objectives and the associated actions it will take, both as an employer and a community leader, to meet the PSED and improve equality outcomes.

Strategy outcomes and objectives

- 4.4 The current Equality Strategy was adopted by Cabinet and Council in early 2021 and runs until 2024.
- 4.5 Since the strategy was adopted, there has been significant change in both the Council and global environment, which includes:
- The Covid 19-Pandemic and its long-term impacts.
 - The Black Lives Matter movement.
 - Significant changes in working practices post-pandemic.
 - Croydon Council Reports in the Public Interest and Section 114 notices.
 - Establishment of a new Corporate Management Team and an Equalities Diversity and Inclusion (EDI) Board.
 - Development and adoption of the Mayor's Business Plan 2022-2026.

- 4.6** These factors have driven changes in Croydon’s approach which the refreshed Equality Strategy seeks to address. The refresh builds on the progress in delivering the current strategy, incorporates equality initiatives, draws on 2021 Census data and reflects the priorities of the Executive Mayor’s Business Plan. The original objectives have been broadly retained and built upon, with actions and associated outcomes shaped to be more easily measurable.
- 4.7** Since 2021, initiatives and policies have been adopted which have been incorporated into the refreshed Strategy, including:
- People and Cultural Transformation Strategy 2022-26: seven pillars for organisational change, one of which is focused on equalities, diversity and inclusion.
 - Croydon Equality Pledge (2022).
 - George Floyd Race Matters Pledge (2022).
 - CELC Tackling Racial Inequality Standard.
 - Council adopted definitions of Anti-Semitism and Islamophobia.
- 4.8** The number of outcomes in the refreshed strategy has been reduced from four to three. As Outcome 2 in the 2020-24 Equality Strategy (‘We work with our residents to better understand our communities’) read more as an action than an outcome, it has been deleted and its three objectives have been redistributed between two other outcomes.
- 4.9** In addition to two objectives moved from Outcome 2 of the 2020-24 strategy, Outcome 1 has two new objectives. Objective 6 deepens the transformation of the Council, moving on from the training specified in Objective 3, to strengthen internal challenge and accountability and tackle systemic issues. Objective 7 is derived from one of the Council’s George Floyd Race Matters pledges.
- 4.10** Outcome 3 (formerly Outcome 4 in the 2020-24 strategy) has been reshaped to better reflect the interdependence of health and social care and the scope of the Council’s responsibility within the system, but the impact sought by the objectives is the same.
- 4.11** The refreshed strategy therefore sets out three outcomes, each with a set of objectives that inform the actions that will be delivered over the course of the next four years:

Outcome 1: The Council addresses social inequities as a community leader and employer

Objectives

1. The Council acts as a role model and champions a fair society.
2. Continue to increase our network across underserved groups (from Outcome 2 in the original strategy).
3. Data about local communities is more effectively collected, analysed and used to inform decisions and improve services (from Outcome 2 in the original strategy).
4. The Council’s workforce reflects our diverse communities at all levels.

5. We ensure equality training is central to the way we work, is regularly undertaken, and is reviewed to meet changing needs.
6. Council staff proactively hold challenging, targeted conversations, holding ourselves to account, listening, learning, believing and taking action on systemic issues concerning inequality (a new objective).
7. The Council demonstrates that it is becoming an inclusive, diverse and anti-racist organisation, by embedding this principle in its strategies, decision-making, actions and behaviours, and promotes anti-racist practice (a new objective).

Outcome 2: Use partnerships to improve access and meet individual needs as they arise

Objectives

1. Information about the Council's work towards tackling inequality is easy to access and understand.
2. Enable better education outcomes by offering support to groups who need it most.
3. Systemic inequalities that lead to school exclusions and young people entering the criminal justice system are addressed.
4. Support the creation of jobs that enhance quality of life.
5. Services are proactive in targeting groups that have accessibility issues.

Outcome 3: People in Croydon are supported to lead healthier and independent lives for longer

Objectives

1. Work with partners to tackle social isolation.
2. Work with our partners to understand and reduce health inequalities.
3. Work with our partners to ensure equitable access to health and care services, and enable residents to know where and how to access services.

4.12 The actions and performance measures have been updated, taking account of achievements so far, as well as commitments in the People and Cultural Transformation Strategy, the Croydon Equalities pledges and guidance by the Chief Executives London Committee Tackling Racial Inequality Programme. It will maintain the ambition of the Council to achieve the vision and go beyond compliance to best practice.

4.13 At its meeting on 12 July, the Council agreed a motion proposing to recognise 'care experienced young people' as a local protected characteristic. In response, the Executive Mayor stated his intention to seek the view of the Corporate Parenting Board on how principles set out in the motion could be best adopted with input from care experienced young people themselves. As this process is ongoing, reference to 'care-

experience' is not made in the Strategy. However, it could be incorporated at a later date pending the recommendations of the Corporate Parenting Board.

- 4.14** In February 2023, the Council agreed to be a pilot organisation in the Chief Executives London Committee (CELC) Tackling Racial Inequality (TRI) Programme. As part of the programme, each council is requested to adopt the London Local Government Anti-Racism Statement. This sets out the purpose behind the statement, how it was developed, the commitment required from organisations and the reasons for all London local authorities to adopt it. It is key to driving systemic cultural change across London authorities and is attached at Appendix B.
- 4.15** The CELC TRI standards also require that each council appoint a Senior Responsible Officer (SRO) for race from both organisational and political leadership. Recommendation 2.4 proposes that the Chief Executive and Executive Mayor be appointed as the internal officer and political SROs.

5 ALTERNATIVE OPTIONS CONSIDERED

- 5.1** Retain the 2020-2024 Equality Strategy until it expires. There is no legal obligation to review equality objectives until 2024, but revision now supports implementation of the equality pledges made in 2022 and work to become an anti-racist organisation and provides clarity by bringing together into one strategy the actions and targets contained in various equality policy documents.

6 CONSULTATION

- 6.1** At its meeting on 25 July 2023, the Scrutiny and Overview Committee considered the Council's proposed approach in updating the Equality Strategy. It welcomed confirmation that the Equalities Impact Assessment was being refreshed and endorsed the approach of requiring the equalities implications of a decision to be assessed at an early stage in the decision-making process, rather than being left to a later stage when it could be more challenging to meaningfully take account of the potential equalities implications. The Committee welcomed that the Equalities Strategy Delivery Plan would focus on measurable outcomes using SMART targets, which ensure that its success could be assessed.
- 6.2** The Committee made the following recommendations:
- 6.2.1 that there be further consideration of how the refreshed Equalities Strategy can reflect the intersectionality between protected characteristics. Response: this has been agreed – a revised template for Equality Impact Assessments will identify issues of double impact, such as race and gender.
- 6.2.2 that a process for holding regular challenge sessions with those officers responsible for specific actions/workstreams within the Strategy be developed as part of the ongoing monitoring of delivery, in order to improve accountability for the delivery of the Equalities Strategy. Response: this has been agreed and will be managed by the Council's EDI Board.

6.2.3 that given its scope, the Equalities Strategy should have a longer-term end date, but that key review points be built into the Strategy at appropriate intervals to allow for adjustments and the opportunity to refocus as needed; and that the refreshed strategy be sufficiently dynamic to take account of any new initiatives or legislation that may arise over its lifespan. Response: the refreshed strategy has been extended to 2027.

6.2.4 That the EDI Board consider embedding Equalities Champions within directorates to complement existing structures and systems within the Council aimed at promoting equalities and inclusivity. Response: The Council already has an equality champion in each directorate and will consider how it will enhance this role to support the delivery of this strategy.

6.3 The Council has consulted on individual elements that make up significant parts of the strategy, such as the Equality Pledge and George Floyd Race Matters Pledge in 2021. There has been extensive staff engagement in the development of the Council's People and Cultural Transformation Strategy. Both the Pledges and the People and Cultural Transformation Strategy have informed the update of the Equality Strategy. Moreover, the updated strategy retains the original objectives, with a few minor adjustments detailed at paragraphs 4.8, 4.9 and 4.10.

6.4 Workshops have been held with staff to receive their feedback on the update of the strategy. In addition, officers across council directorates have been involved in reviewing and updating supporting actions and performance measures to ensure that they are effective and fit for purpose.

6.5 The Council will continue to engage with residents on equality issues during the life of the strategy. It will also ensure that council employees have an opportunity to give their views on the progress achieved and co-create where possible. In particular, as part of the CELC TRI initiative, staff will be involved in exploring anti-racism, which will be followed by public engagement on residents' perceptions of the Council as an anti-racist organisation.

7. CONTRIBUTION TO COUNCIL PRIORITIES

7.1 The Equality Strategy supports two priorities under Outcome 1 of the Executive Mayor's Business Plan 2022-26:

- Become a council which listens to, respects and works in partnership with Croydon's diverse communities and businesses.
- Develop our workforce to deliver in a manner that respects the diversity of our communities.

7.2 We will work to increase opportunities for residents to get involved in decisions and improvements that affect their lives and to put local voices at the heart of the Council's work. We will ensure that all residents are treated fairly, with respect and dignity. We need to strengthen leadership and management, develop behaviours aligned with the

Council's values, improve staff skills, and create a psychologically safe and inclusive environment for all staff. We will support, develop and value our staff to ensure the Council is accessible and visible to our diverse communities and that it delivers the proactive and respectful services they expect and deserve.

8. IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

8.1.1 There are no direct financial implications arising from the updated Equality Strategy 2023-27.

8.1.2 Comments approved by Lesley Shields, Head of Finance for Assistant Chief Executive and Resources on behalf of the Director of Finance. 17/08/23.

8.2 LEGAL IMPLICATIONS

8.2.1 Section 149(1) (a) to (c) of the Equality Act 2010 sets out the public sector equality duty with which the Council is required to comply. A public authority must, in the exercise of its functions, have due regard to the need to—

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.2.2 In addition, the Council is required to publish one or more objectives it thinks it should achieve to do any of the things mentioned in paragraphs (a) to (c) of subsection (1) of section 149 of the Act referenced above.

8.2.3 The objectives must be published—either not later than 30 March 2018; and subsequently at intervals of not greater than four years beginning with the date of last publication, or at intervals of not greater than four years beginning with the date of last publication if the authority had published its objectives under the previous Regulations in the four year period ending on 30 March 2018.

8.2.4 An objective published by a public authority in compliance with paragraph (1) must be specific and measurable and must be published in such a manner that the information is accessible to the public.

8.2.5 The Equality strategy and the supporting Action Plan, along with the approach to monitor its success and deliverability will help the Council to meet the PSED in full and will help to minimise any likelihood of a successful legal challenge on this.

8.2.6 The Equality Strategy, which includes the equality objectives, is part of the Council's Policy Framework under Article 4 of the Constitution and must be adopted or approved by Full Council. In addition, the adoption or approval of plans and strategies comprising the Policy Framework must comply with the provisions of the Budget and Policy Framework Procedure Rules in Part 4.C of the Constitution.

8.2.7 Comments approved by the Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer. (Date 11/08/2023)

8.3 EQUALITIES IMPLICATIONS

8.3.1 As a public body, the Council is required to comply with the Public Sector Equality Duty [PSED], as set out in the Equality Act 2010. The PSED requires the Council to have due regard to the need to eliminate discrimination, harassment or victimisation, advance equality of opportunity, and foster good relations between different people when carrying out their activities and functions. Failure to meet these requirements may result in the Council being exposed to costly, time consuming and reputation-damaging legal challenges.

8.3.2 The update of the 2020-24 Equality Strategy seeks to achieve the same vision: for Croydon to be "a place of opportunity where everyone can belong, addressing the needs and aspirations of all those who live and work in the borough." The updated strategy also retains the equality objectives the Council adopted for 2020-2024 but updates the actions and performance measures for the period 2023-2027, to take account of the progress achieved so far and maintain the ambition.

8.3.3 The revised strategy will help the Council to meet the PSED in full, and the supporting Action Plan, along with the approach to monitor its success and deliverability, will also assist the Council in meeting its specific duties imposed by Regulations made under Section 153 of the Act, thus minimising any reason or likelihood of a successful legal challenge on this.

8.3.4 The 2020-24 strategy was developed in partnership with Croydon's residents, businesses, Voluntary, Community and Faith Sector (VCFS) and staff. We gathered information from a range of impact and needs assessments, identified key challenges and invited a range of internal and external stakeholders to confirm these. We also utilised information a range of national and local sources, some of which are outlined in section 6 of the report. The refreshed strategy takes account of Croydon's Equality Pledge and George Floyd Race Matters Pledge which were consulted on in 2021. The renewed strategy also includes our commitment to systemic change with regard to anti-racism as detailed in the London Local Government Anti Racism Statement and includes objectives from the People and Cultural Transformation Strategy 2022-2026.

- 8.3.5** The Council is taking a positive action approach to equality, which is permissible under Equality Act 2010. Positive action is defined as taking “proportionate” steps to improve equality in the workplace by removing or reducing barriers faced by certain groups with shared protected characteristics.
- 8.3.6** An equality analysis (Appendix C) has been completed and highlights the positive impact that the revised strategy has on all protected characteristics. It also includes data about our residents from Census 2021, along with data about our employees including non-disclosure and details of some of the initiatives that are been carried out to address our public sector duty. We are committed to improving the lived experience of all our residents and employees, in particular those who are underserved. We will listen to our residents and employees and ensure that the systemic change that we are making benefits those who live, work and visit our borough.
- 8.3.7** Comments approved by Denise McCausland, Equalities Programme Manager. (09/08/2023)

OTHER IMPLICATIONS

8.4 HUMAN RESOURCES IMPACT

- 8.4.3** Equality is integral to our workforce processes, policies and practices, including becoming an employer of choice. We continue to make positive progress towards having a workforce that reflects its community and where inclusivity is embedded in our practice, though it is recognised that there is more to do.
- 8.4.4** The strategy will help the Council achieve its ambition to be an organisation that is collaborative, inclusive and innovative, an employer that lets talent flourish and build workforce capability to meet our ambitions and reflect Croydon’s communities.
- 8.4.5** Approved by: Gillian Bevan, Head of HR, Resources and Assistant Chief Executives Directorates on behalf of Dean Shoesmith, Chief People Officer. (Date 10/08/2023)

9 APPENDICES

- 9.1** A. *Croydon Equality Strategy 2020-27*
- B. *London Local Government Anti-Racism Statement*
- C. *Equality Analysis Form*

10 BACKGROUND DOCUMENTS

- 10.1 None

EQUALITY STRATEGY FOR CROYDON

2023 - 2027

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FOREWORD

Over the past three years Croydon has seen major change. The Covid-19 pandemic has had a dramatic impact on inequalities and transformed the way many of us work. The global rise in the cost of living has put extra strain on our communities. In Croydon, the two Reports in the Public Interest and declaration of Section 114 notices have fundamentally changed how the Council will have to operate in the future. These changes, as well as a new political direction for the Council, have triggered this early refresh of the Council's Equality Strategy 2020-2024.

The Council's public sector equality duty is to advance equality of opportunity, foster good community relations and eliminate unlawful discrimination, harassment and victimisation. We will have regard to it in all council functions, going further where possible by demonstrating best practice in equality.

Whilst the refreshed strategy keeps almost all the Outcomes and Objectives of its predecessor, it is informed by data from Census 2021 and our progress to date. It reflects the initiatives and activities now under way, including work to deliver the George Floyd Race Matters and Croydon Equality Pledges, and the intended inclusion of Gender and Anti-racism in equality impact assessments of our decisions and policies. The refreshed strategy provides a clear, measurable strategic framework for equality in Croydon.

The Strategy also reflects the unprecedented financial challenge facing the Council and the new direction set out in the Mayor's Business Plan 2022-26 to transform it into one which balances its books, listens to residents and delivers sound and sustainable local government services. To achieve that, the coming years will see significant transformation of the Council as it seeks to reduce costs. This will inevitably mean doing less, but working hard to be better at what we continue to do. To succeed, we must consider equality from the earliest stage as we design new service models around those who need them most.

Not only does the Council have duties to its residents, it also has responsibilities to its staff as an employer. The work done by our staff, often under very challenging circumstances, is vital to deliver services that are responsive to the needs of our residents. As we transform the way the Council operates, we need to be sure we are listening to our staff, creating a safe inclusive culture for collaboration and challenge and equipping them with the tools and training they need to deliver the change our residents expect. We need to continue tackling pay gaps, ensuring reasonable adjustments are in place and remembering that, like our borough, our employees are a diverse group who should be supported and celebrated. This strategy, alongside the People and Cultural Transformation Strategy 2022-26, sets out our updated plans for how we will provide a safe environment that supports our employees' health and wellbeing.

Of course, we cannot achieve our ambition to enhance and embed equality alone. It is a priority for us to become a council which listens to, respects and works in partnership with Croydon's diverse communities, businesses and other public sector organisations like the NHS. Collectively we will work to make Croydon a place where people feel valued and can have a voice, a place free from prejudice and discrimination.

Jason Perry, Executive Mayor of Croydon

INTRODUCTION

The purpose of the Council's Equality Strategy is to provide a detailed insight into our ongoing commitment to equality, set out in one place our equality objectives and other arrangements for embedding equality into everything we do and, perhaps most importantly, set out where we will focus improvements.

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This refreshed Equality Strategy reflects the exceptional financial and governance challenges facing the Council. Equalities considerations will need to be at the heart of the Council's thinking, given the level of change and service transformation expected over the coming years. This Strategy sets out a framework for the actions we will take, and the values we will be guided by, as the council transforms to reduce costs, improve outcomes and reduce inequality for residents.

Developing the strategy and its objectives

The Council, like other public bodies, must publish information about equality every year and equality objectives every four years. Our approach in 2020 built on the partnership work undertaken the previous year to identify priorities through assessments, surveys and consultation exercises. These activities highlighted issues that need to be addressed in the years ahead. From this information our equality objectives were drafted and adopted after a final consultation.

It should be noted that many council services are currently contributing through their strategies to tackle inequalities and address disadvantage for protected groups across the borough. Some of the equality objectives will be found embedded in other relevant strategies and plans that are published, such as the Health and Wellbeing Strategy and Adult Social Care and Health Strategy. Importantly, the absence of an equality issue in these objectives does not mean that it is insignificant, or that we will ignore that issue; rather, it signifies that we focus our effort and limited resource on addressing the greatest inequalities.

Updating the strategy

We have updated the strategy at a time of great change for Croydon. In doing so we have been informed by the Mayor's Business Plan 2022-2026, the Council's main strategic document, the progress that we have made, and new equality initiatives. We are also giving effect to the Chief Executives London Committee's (CELC) Tackling Racial Inequality Standard. Equality Impact Assessments in Croydon will consider anti-racism and gender in addition to protected characteristics specified by the Equality Act 2010. Key to delivering this strategy will be the allocation of limited resources to deliver positive outcomes, as far as is practicable at a time when the organisation is under significant financial pressure.

This strategy supports the following objectives of the Mayor's Business Plan:

- **Become a council which listens to, respects and works in partnership with Croydon's diverse communities** through committing to work with residents to better understand our communities by increasing our network across seldom heard groups; to use data about local communities to inform decisions and improve services; and to ensure services proactively target groups that have accessibility issues as a result of age, mental health, disability, language, digital and or physical barriers. We will also develop our understanding of the intersectionality between protected characteristics.
- **Develop our workforce to deliver in a manner that respects the diversity of our communities** through ensuring it reflects our diverse communities at all levels and receives regular, updated equality training, holding ourselves to account and tackling systemic issues concerning equality issues and becoming an anti-racist organisation.
- **Deliver a vibrant London Borough of Culture which showcases local talent and supports Croydon's recovery** through a programme that reflects the borough authentically and shines a light on our diverse communities.
- **Support the local economy and enable residents to upskill and access job opportunities** through ensuring that people with protected characteristics are able to benefit.
- **Ensure children and young people have opportunities to learn, develop and fulfil their potential** through enabling better education outcomes by groups who need support and addressing inequalities that lead to school exclusions and young people entering the criminal justice system.
- **Tackle anti-social behaviour, knife crime and violence against women and girls so that Croydon feels safer** through committing to the development of a strategy to tackle violence against women and girls.

- **Work with partners and the voluntary community and faith sector (VCFS) to promote independence, health and wellbeing and keep vulnerable adults safe** through committing to joint work to ensure equitable access to health and care services and enable residents to know where and how to access services.
- **Work closely with health services and the VCFS to improve resident health and reduce health inequalities** through committing to joint work to understand and reduce health inequalities.

Progress highlights

Over recent years we have made significant progress delivering the Equality Strategy 2020-2024, for example:

- An improvement in the proportion of staff preferring not to disclose their equality information between 2019/20 and 2022/23, e.g. from 32% to 20% for ethnicity; 34% to 22% for disability; and 36% to 23% for sexual orientation
- The gender pay gap for council staff was eliminated and the disability pay gap is low.
- There has been a general improvement in reducing the gap between the council's staffing profile and Croydon's population in terms of ethnicity.
- Developed the Equalities Pledge and George Floyd Race Matters Pledge in 2022, to engender a societal change in the borough and cultural change at the Council, other Croydon places of employment and voluntary and community groups. 37 organisations signed up to one or both. We will continue to encourage other community, voluntary and faith groups along with businesses and statutory organisations to adopt the pledges.
- Adopted the all-Party Parliamentary Group on British Muslims' definition of Islamophobia in January 2022.
- Croydon Council was designated a Spotlight Organisation for Race Equality Week in 2022 and 2023.
- Introduced Tea Break staff meetings to raise awareness on equality issues and support culture change. Received the Bronze Trailbreaker Award for Tea Breaks from Race Equality Matters in November 2022
- Developed a Guardian's Programme to give employees a safe space to talk about issues of concern relating to the organisational culture, bullying or other forms of inappropriate behaviour.
- Council staff diversity network groups have supported change to our workforce profile by their visibility of staff diversity through awareness raising events, communications campaigns and role modelling. Two new staff network groups were integrated into council decision making process: the Christian Network in May 2022 and the Young Professionals Network in February 2023.

We have established an Equality, Diversity and Inclusion (EDI) Internal Control Board which meets every month to provide equality governance and coordinate arrangements for monitoring progress against the strategy and for embedding equality into council functions. Progress is reported to the Corporate Management Team and Cabinet. Supported by the Council's Equality Programme Manager, the EDI Board has been responsible for overseeing the review of this strategy.

We will strive to ensure that the equality objectives in this strategy are owned by all leaders, managers and employees and embedded across the organisation, through commitments in service plans, personal objective setting and pledges. The EDI Board will hold directorates to account on progress in implementing this strategy. We will report on the implementation of this plan every year, using updates from all directorates and partnerships that own the objectives, measures and actions, to ensure that council policies and practice take account of our progress, the lessons we have learnt, and any emerging and prevalent national and local priorities. Ahead of the development of a new equality strategy for 2027-2031, we will conduct a comprehensive analysis of our measures and progress to date.

We face difficult decisions ahead and cannot do everything we would like or see a need for. We will however improve our work with our partners and our communities to meet rising demand and the challenges ahead, while remaining conscious that equality, diversity and inclusion must be at the heart of the design and delivery of our services and the achievement of best value.

PLAN ON A PAGE

VISION

Croydon is a place of opportunity where everyone can belong, addressing the needs and aspirations of all who live and work in the borough

The Council addresses social inequities as a community leader and employer

- OBJECTIVE 1: The Council acts as a role model and champions a fair society.
- OBJECTIVE 2: Continue to increase our network across underserved groups.
- OBJECTIVE 3: Data about local communities is more effectively collected, analysed and used to inform decisions and improve services.
- OBJECTIVE 4: The Council's workforce reflects our diverse communities at all levels.
- OBJECTIVE 5: We ensure equality training is central to the way we work, is regularly undertaken, and is reviewed to meet changing needs.
- OBJECTIVE 6: Council staff proactively hold challenging, targeted conversations, holding ourselves to account, listening, learning, believing and taking action on systemic issues concerning inequality.
- OBJECTIVE 7: The Council demonstrates that it is becoming an inclusive, diverse and anti-racist organisation, by embedding this principle in its strategies, decision-making, actions and behaviours, and promotes anti-racist practices.

Strong partner working ensures improved access to opportunities and meets individual needs as they arise

- OBJECTIVE 1: Information about the Council's work towards tackling inequality is easy to access and understand.
- OBJECTIVE 2: Enable better education outcomes by offering support to groups who need it most.
- OBJECTIVE 3: Systemic inequalities that lead to school exclusions and young people entering the criminal justice system are addressed.
- OBJECTIVE 4: Support the creation of jobs that enhance quality of life.
- OBJECTIVE 5: Services are proactive in targeting groups that have accessibility issues.

People in Croydon are supported to lead healthier and independent lives for longer

- OBJECTIVE 1: Work with partners to tackle social isolation.
- OBJECTIVE 2: Work with our partners to understand and reduce health inequalities.
- OBJECTIVE 3: Work with our partners to ensure equitable access to health and care services and enable residents to know where and how to access services.

OUTCOME ONE:

The Council addresses social inequities as a community leader and an employer

The Council believes in the dignity of all people and their right to respect and equality of opportunity. We are proud of the diversity of our staff and residents and regard this as a strength of our borough. Our aspiration is for Croydon to be safe, welcoming and inclusive. Our People and Cultural Transformation Strategy 2022-26 aims to build an equality driven, diverse and inclusive workplace. The Council recognises its role as both a community leader and an employer reducing inequalities and championing a fairer society. Strong, visible leadership is essential to embed equality, anti-racism and zero tolerance of all forms of discrimination, harassment and bullying in the organisation and the community. For this reason, in 2022 we co-created and adopted the Borough-wide [Equalities Pledge](#) and [George Floyd Race Matters Pledge](#) (Appendix 2), which we encourage other organisations in the Borough to adopt.

Objective 1: The Council acts as a role model and champions a fair society.

We believe equality is everyone’s business: all staff, including anyone we work with or commission to work on our behalf, must advance equality, promote good relations and eliminate discrimination in their work. The Council should continue to lead by example and demonstrably comply with the statutory Public Sector Equality Duty in the services it delivers directly, as well as those it commissions from other providers. It should also seek to influence other organisations and partners to advance equality, diversity and inclusion.

What actions will we take?	What will success look like?
<p>We will continue to:</p> <ol style="list-style-type: none"> 1. Ensure our Equality Impact Assessments are data and evidence driven. 2. Ensure that council contracts comply with the Public Sector Equality Duty. 3. Encourage other organisations to adopt the Equality Pledge and George Floyd Race Matters Pledge. 4. Promote equality of opportunity for individuals of all protected characteristics by recognising and promoting significant celebrations and awareness days and ensuring that workplace practices do not discriminate against any groups. 	<ol style="list-style-type: none"> 1. Equalities pledges have been incorporated into the practice of the Council and promoted to Croydon’s VCFS, statutory organisations and businesses. 2. More Croydon organisations are registered as signatories to the pledges. 3. Every new strategy, service plan and staff appraisal has equality objectives. 4. All Council contracts comply with the Public Sector Equality Duty. 5. Equality Impact Assessments (EQIAs) are data driven and demonstrate evidence and impact (where change has been made in relation to the EQIA).

We will also:

5. Ensure that every new strategy, service plan and staff appraisal has an equality objective linked to it and reflects our commitment to anti-racism.
6. Develop a culture in the Council which puts equality at the centre of service delivery through delivery of the People and Cultural Transformation Strategy 2022-26.
7. Develop a three-year partnership plan to tackle violence against women and girls.
8. Develop a youth safety plan with partners and young people to reduce serious youth violence and exploitation.
9. Develop with our community partners a new Homelessness and Rough Sleeping Strategy for 2024-2028 as well as a financial inclusion strategy for council tenants.
10. As part of Borough of Culture, have a cultural programme that reflects Croydon authentically, is accessible to all and highlights communities that have been under-represented through ways such as film screenings and museum exhibitions.

Objective 2: Continue to increase our network across groups that are underserved

While we engage meaningfully with large parts of the community, like other councils we must continue to develop better ways of reaching those groups that are underserved, for example LGBT+, refugees, asylum seekers, homeless people, Gypsy, Roma and Travellers, people with disabilities including those with communication impairments. Given the scale of change in Croydon, it is important that the voices of all communities are heard. Drawing on the 2021 Census data, our Equality Impact Assessments (EQIAs) will enable us to consider the best methods to consult and identify which groups we need to do more to reach. We will review our corporate approach to community engagement and produce guidance for council services on their consultations and engagements to support inclusion and demographic diversity. We will also introduce a resident survey to increase the opportunity for local people to give their feedback on the Council, its policies and culture.

What actions will we take?

What will success look like?

We will continue to:

- 11. Establish and embed effective arrangements for participation to ensure that the voice of the child and the voice of the parent/carer informs service delivery improvement.
- 12. Co-design new resident voices model for adult social care to enable people with lived experience to contribute to policy making, commissioning and service delivery.
- 13. Ensure service user surveys contain “how satisfied or dissatisfied are you that the council listens and acts on your feedback”.

We will also:

- 14. Review our corporate approach to community engagement, to ensure that it is effective in reaching all communities including minoritised groups and promotes a culture of sustained and equitable engagement and participation within all areas of the organisation.
- 15. Actively listen to and take account of resident feedback, give guidance to services on their consultations and engagements, and introduce a resident survey.
- 16. Hold regular question time sessions with the Executive Mayor around the borough.
- 17. Ensure formal consultations and service user surveys collect data on protected characteristics of respondents and use this data to identify and target improvements to services.

- 6. Baseline data on who is engaging with the Council enables us to focus efforts on engaging with those who are not; ongoing data tracks progress.
- 7. We have clearer data on service user satisfaction and know where we are doing well and where we must improve.
- 8. The Council engages with all communities and seeks to involve residents as much as possible to co-create services and define actions to tackle inequalities and promote anti racist practice.
- 9. Young people, parents, carers and adult social care users feel that improvement of the services they access is informed by their views.
- 10. The Council listens to and responds to views from all communities and gives feedback on how this is incorporated into decisions to ensure transparency and trust are maintained.

Objective 3: Data about local communities is more effectively collected, analysed and used to inform decisions and improve services.

Good policy development should be informed by accurate, comprehensive and timely equality information from the outset wherever possible to allow policies to target resources and improve outcomes for those who need it most. Currently, data mostly relates to age, gender, disability and ethnicity with lower levels of data held about other minoritised groups. Our information is not always sophisticated enough to allow us to draw useful inferences, for example our data on religious/faith groups; people who identify as lesbian, gay, bisexual or transgender; members of newer communities, and some other protected characteristics, depends on the 2021 Census which will become outdated with time. To improve decision making further, we will develop a consistent approach to data collection and quality across the organisation with a lens for inequalities.

What actions will we take?	What will success look like?
<p>We will continue to:</p> <p>18. Support staff to improve the collection of accurate, complete and up to date equality data about the Croydon population and council service users.</p> <p>19. Use equality data and information intelligently to inform priorities and policies, as well as target interventions and resources.</p> <p>We will also:</p> <p>20. Adopt gender as a local characteristic to ensure that we continue to hear the voices of people who identify differently from their sex identified at birth. EQIAs to consider both sex and gender separately.</p>	<p>11. Standardised equalities data is captured by council services and is updated, shared, analysed and used to help inform decisions, policies and service improvements.</p>

Objective 4: The Council's workforce reflects our diverse communities at all levels.

For the Council to serve the people of Croydon effectively, its workforce needs to reflect the borough's population at all levels of the organisation – from front line staff to strategic decision-makers. Progress has been made on this front and the proportion of staff preferring not to disclose their equality information is falling significantly. The council workforce is becoming more representative of the borough's population in terms of ethnicity and sex. Croydon has not seen gender and disability median pay gaps in recent years. However, there is more to do to tackle the ethnicity pay gap and to reflect our borough's diversity, particularly at senior levels of the organisation and at grade 15 and above. This requires further work to eliminate conscious and unconscious bias at all stages of the employee cycle: recruitment; induction and supervision; training and development; retention and reward; and disciplinary and grievances.

What actions will we take?	What will success look like?
<p>We will continue to:</p> <ul style="list-style-type: none"> 21. Support staff to share their equality data to improve the disclosure rates by increasing understanding of how we use it to drive positive change. 22. Develop annual performance indicators to measure recruitment, learning and development, career progression and employee relations, analyse and publish data and take action to address identified trends. 23. Publish an annual pay audit by gender, disability and ethnicity and implement an action plan to reduce the gaps. 24. Ensure all council recruitment panels represent the diversity of Croydon's population wherever possible. 25. Use anonymous recruitment processes which don't reveal details of race, age, gender, disability or socio-economic status. 26. Provide reasonable adjustments for disabled staff in interviews and employment. 27. Positively encourage applications from diverse and under-represented groups when advertising for posts and taking actions to respond to under representation in this area identified by organisational data. 	<ul style="list-style-type: none"> 12. Equality disclosure rate among council staff is increased to at least 85%. 13. Published data shows that the council workforce's profile reflects Croydon's communities and under-represented groups - including at grade 15 and above. 14. More staff from all under-represented protected characteristics participate on available leadership programmes. 15. Gender and disability pay gaps in the Council remain at zero and the ethnicity pay gap continues to reduce and remains below the London average.

Objective 5: The Council ensures equality training is central to the way we work, is regularly undertaken, and is reviewed to meet changing needs.

We will develop our workforce to deliver in a manner that respects the diversity of our communities. In working towards this aim, we regularly review the training in equality, diversity and inclusion provided to all staff, so they gain the relevant knowledge and skills to mainstream equality best practice. Councillors will receive training too. We will also run action leadership and talent development programmes for staff from minoritised groups.

What actions will we take?	What will success look like?
<p>We will continue to:</p> <p>28. Review current equality skills, knowledge and training available to meet service needs and identify gaps.</p> <p>We will also:</p> <p>29. Ensure that all staff complete mandatory training in equality, diversity and inclusion, including anti-racism, every two years, attendance is monitored and managers are held to account; all officers who write reports to complete EQIA training.</p> <p>30. Provide training in equality, diversity and inclusion, now including anti-racism, for Councillors in line with staff training. Member attendance will be reported to the Ethics Committee.</p>	<p>16. All new starters (officers and Members) have completed Equality Essentials, conscious inclusion training and other appropriate designated training.</p> <p>17. Consistent high-quality of EQIAs.</p> <p>18. Equalities training is regularly reviewed.</p>

Objective 6: Council staff proactively hold challenging, targeted conversations, holding ourselves to account, listening, learning, believing and taking action on systemic issues concerning inequality.

We will ensure a zero-tolerance approach to all forms of discrimination, harassment and bullying from employees, residents, customers and service users, publicising the staff code of conduct and providing staff with information on what it is. We will encourage people to safely challenge negative behaviours, including bias and the use of stereotypes, ensuring that they are not treated less favourably for doing so. We will build on the successful 'Tea Talks' and staff Guardians programmes to ensure safe spaces are in place to increase the staff voice and engagement, including supporting our range of staff diversity networks (Race Equality Network, Disability Network, Women's Network, LGBT+Allies Network, Carers Network, Christian Network, Croydon Young Staff Network and Mental Health and Wellbeing Network). We will support our managers to manage diverse teams and resolve equity related issues by ensuring that we have equipped them with the knowledge and skills to do so.

What actions will we take?	What will success look like?
<p>We will:</p> <p>31. Ensure a zero-tolerance approach to all forms of discrimination, harassment and bullying, publicising the staff code of conduct, providing staff with information on what it is and encouraging people to safely challenge this where it occurs ensuring that people are not treated less favourably for doing so.</p> <p>32. Ensure reasonable adjustments are available (including when working from home) for those who need them, including reflecting the needs of neurodiverse staff.</p> <p>33. Conduct pulse surveys to identify the impact of organisational actions on employees' lived experience and psychological safety at work and ask: 'How satisfied or dissatisfied are you that the Council as your employer listens and acts on your feedback?'</p> <p>34. Continue the programme of 'tea talks' for staff exploring issues, led by staff networks, to create safe spaces for collective staff learning and discussion.</p> <p>35. Ensure leadership and project meetings at all levels dedicate time to EDI issues, creating actions, identifying inequalities, tracking progress against the equality strategy, and ensuring accountability.</p>	<p>19. Staff and managers feel safe to discuss their lived experience and be their authentic selves at work with no expectation of retaliation.</p> <p>20. Tackling race inequality is part of everyday conversation. This is measured in pulse surveys.</p> <p>21. Employee surveys show an increase in satisfaction levels.</p> <p>22. Senior leaders personally challenge race and other inequalities and drive an improvement agenda. They are able to demonstrate instances of allyship around anti-racist practice and race-related issues.</p> <p>23. Senior leaders and managers demonstrate their commitment to equality in decision-making and have specific equality, diversity and inclusion performance objectives and accountabilities, including tackling racial inequalities.</p>

Objective 7: The Council demonstrates that it is becoming an inclusive, diverse and anti-racist organisation, by embedding this principle in its strategies, decision-making, actions and behaviours, and promotes anti-racist practices.

We want to go beyond compliance with the Equality Act 2010 and become a council which actively champions the values and behaviours of a diverse and inclusive organisation committed to continuous improvement. Our People and Cultural Transformation Strategy supports the cultural and behavioural change required at all levels of the organisation. Alongside this, we are piloting the Chief Executives London Committee (CELC) Tackling Racial Inequality Standard. We will apply the good practice we learn from this beyond race equality to all our equalities work.

What actions will we take?	What will success look like?
<p>We will:</p> <p>36. Adopt the London Councils anti-racist statement at Cabinet in September 2023 and develop anti-racist framework for Croydon which embeds anti-racism in our strategies, actions, behaviours, EQIAs and decision making.</p> <p>37. Building on action 31 above, commit to zero tolerance of racism from employees, residents, customers, suppliers and service users by challenging racist behaviour or stereotypes expressed by individuals.</p> <p>38. Deliver positive action leadership and talent development programmes for staff from all minoritised groups.</p> <p>39. Establish reciprocal mentoring partnerships between Corporate Management Team / Senior Leadership and Global Majority staff and other racialised and minoritised staff.</p> <p>40. Engage with staff to explore anti-racism and how it can be promoted through employment practice and service delivery.</p> <p>41. Conduct pulse surveys of staff, firstly to establish a baseline of how many consider the Council to be an anti-racist organisation and then to assess improvement.</p> <p>42. Seek feedback from the public on whether they consider the Council to be an anti-racist organisation.</p>	<p>24. Race and equality considerations are visibly evaluated and reflected in our strategies and action plans. They are clearly communicated to staff, residents, suppliers and partners and embedded into processes and procedures.</p> <p>25. The organisation can evidence change/improvement in habits, behaviours and ways of working via informal and formal mechanisms such as staff surveys, staff networks, and feedback across all levels in the organisation.</p> <p>26. The impact of anti-racist training delivered to the workforce is visible in the council's culture and an increasing percentage of residents and staff consider the Council to be an anti-racist organisation.</p> <p>27. Reciprocal mentoring enables Global Majority employees to learn from the experience of senior staff, who in turn learn from the experiences of Global Majority and other racialised council colleagues and develop a better understanding of how to tackle racial inequality in the workplace.</p>

OUTCOME TWO:

Strong partner working ensures improved access to opportunities and meets individual needs as they arise.

Our goal is to break the cycle of inter-generational disadvantage starting in early childhood and reoccurring throughout life and improve the outcomes for all our residents, but particularly those experiencing inadequate housing, poor diet, lack of access to decent open spaces and other factors which compound disadvantage for those from less well-off backgrounds. There is a clear linkage between poverty and underserved communities. Data for 2021/22, for example, show that in the UK the proportion of people in relative poverty after housing costs was 31% for families in which someone had a disability, compared with 18% for those where nobody was disabled. This means that family income, excluding disability benefits, was below 60% of average household income. Data for 2019/20 to 2021/22 show that some ethnic groups also face much higher rates of relative poverty after housing costs than others, particularly those who are from a Bangladeshi ethnic group (53%), Pakistani (49%) or Black (40%), compared with those from a White ethnic group (19%). The Council cannot tackle the underlying causes of inequality alone, but we will seek to use our partnerships to tackle the inequality of life chances. For instance, with our community partners we will develop a new Homelessness and Rough Sleeping Strategy for 2024-2028 as well as a financial inclusion strategy for council tenants. Progress will require a concerted effort from the Council and its partners.

Objective 1: Information about the council's work towards tackling inequality is easy to access and understand.

We will be open and transparent about what we are doing to tackle inequality, the progress we have made as well as the challenges we face. Equality data is published on the Croydon Observatory, to ensure that voluntary, community and faith sector partners, health colleagues and partners can use the information and the Council to work with them to identify gaps, assess needs, set priorities and equalities objectives.

What actions will we take?	What will success look like?
<p>We will continue to:</p> <ol style="list-style-type: none"> 1. Provide open and transparent communications about our progress against equality objectives: <ul style="list-style-type: none"> - publish an accessible equality annual report demonstrating progress and share this with our community and partners. - Continue to publish up-to-date equality data on the Croydon Observatory. 	<ol style="list-style-type: none"> 1. Equalities information and progress against objectives is published regularly on the Croydon Observatory. This is easy to access and understand. 2. The Council uses consistent and understandable terminology which is explained and accessible to residents.

<p>We will also:</p> <ol style="list-style-type: none"> 2. Use the terms Global Majority, racialised groups and minoritised groups in everyday conversation, articles, reports and strategies, explaining why they are needed (see Glossary at Appendix 1). 3. Use the International Holocaust Remembrance Alliance (IHRA), definition of anti-Semitism and All-Party Parliamentary Group on British Muslims definition of Islamophobia as adopted by full Council. (See Glossary) 	
<p>Objective 2: Enable better education outcomes by offering support to vulnerable groups in targeted areas of the borough, including boys and those eligible for the PPG (pupil premium grant).</p> <p>Progress has been made improving education outcomes in Croydon in recent years, but there remain significant inequalities in attainment. The early years challenge is the most profound for the borough as a whole and particularly for children from specific racialised groups, namely the African and African Caribbean communities. Training and challenge are offered to school leaders on adultification and other topics which help to safeguard and improve outcomes for these groups. We focus on developing inclusive practices for schools, including anti-racist strategies in conversations with school leaders. Children getting free school meals in Croydon have access to a range of year-round activities and provisions aimed at raising their attainment.</p>	
<p style="text-align: center;">What actions will we take?</p>	<p style="text-align: center;">What will success look like?</p>
<p>We will continue to:</p> <ol style="list-style-type: none"> 4. Work in partnership with all Croydon schools, settings and partners to share best practice, deliver the very best for all our young people and ensure resources are targeted at intervening in exclusion and suspension practices where issues of disproportionality arise. 5. Analyse the achievement of specific pupil groups and take action to enable better outcomes to address gaps. 6. Signpost to information available on education, training and employment opportunities, qualifications and careers guidance, 	<ol style="list-style-type: none"> 3. A narrower outcome gap for groups identified as underachieving, especially at Key Stages 1, 2, 4 and 5. 4. A higher % of residents from protected groups and disadvantaged areas gaining qualifications (inc. English) and training opportunities via Croydon Adult Learning and Training (CALAT).

<p>including basic English skills, post-16 provision, financial management and additionally guidance for over-50s.</p> <p>7. Share best practice and learn from our partners, for example through the Pupil Premium Network, to include best practice on wellbeing and emotional needs support.</p>	
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Objective 3: Systemic inequalities that lead to school exclusions and young people entering the criminal justice system are addressed

Improving outcomes for young people is best achieved when they are able to remain in school. We work to improve attendance of all pupils but with areas of focus on White working-class boys, boys of African and African Caribbean heritage, Gypsy, Roma and Travellers and those accessing free school meals, through frontline engagement workers and the Team Around the School model.

<p>What actions will we take?</p>	<p>What will success look like?</p>
<p>We will continue to:</p> <p>8. In partnership with the health service, work with education and training settings to listen to the voice of children and young people on their mental wellbeing, the availability of pastoral and therapeutic support in schools, and their links to support networks outside schools.</p> <p>9. Monitor attendance and exclusion rates and take action to address over-representation where identified.</p>	<p>5. Increase in the percentage of young people who feel they are listened to - including looked after children and young carers.</p> <p>6. Improved school attendance and reduced suspension and permanent exclusion rates for all identified groups.</p> <p>7. Reduced proportion of Global Majority and other racialised young people listed for youth justice cautions, conditional cautions and community resolutions ('out of court disposals').</p>

Objective 4: Support the creation of jobs that enhance quality of life, particularly targeting those under-represented in the employment sector

We want to build an inclusive economy in Croydon, supporting the creation of fair employment and good quality jobs for local people. The long-term unemployed which is statistically more likely to include the over-50s, disabled people, Global Majority and other racialised groups, women, young people, lone parents, and people with mental health diagnosis, as well as those lacking basic English skills or with low levels of literacy, are most likely to face barriers to full employment, as people with established work skills and experience re-enter the employment market. Some of the most disadvantaged people often lack basic information and skills. Every major ethnic group in London has seen a fall in the proportion of people who are not in paid work in the decade up to 2022.

In Croydon some communities were further away from the jobs market than others. According to the 2021 census, the Bangladeshi population of working age had the highest rate of economic inactivity (40.4%), followed by Pakistani residents (40.3%). This compares with residents from Indian and White ethnic backgrounds who had the lowest rates (25.1% and 24.2% respectively). With regard to disability, 12.2% of working age residents who had a work-limiting disability were unemployed, compared with 5.6% of those who did not. Age is also a factor: 87.0% of residents aged 25-49 had a job in 2022, compared with 72.5% of those aged 50-64.

The Council’s apprenticeship programme works with providers to support 300 businesses to develop training programmes and new employment pathways for Croydon residents. 324 employers have adopted the Good Work Standard that provides employers with a set of best employment practice.

What actions will we take?	What will success look like?
<p>We will continue to:</p> <ul style="list-style-type: none"> 10. Engage with local employers to increase the number and range of apprenticeships, work experience placements, improve access to career opportunities, and pay the London Living Wage. 11. Promote the Good Work Standard in Croydon and support new and emerging entrepreneurs from underserved communities. 12. Working with the South London Partnership, use the Work and Health Programme to ensure that residents with disabilities, care leavers and those further away from the job market receive targeted personalised support into employment. 13. Work with the education sector and others to increase the number of people with the skills needed to contribute to our local digital economy. <p>We will also:</p> <ul style="list-style-type: none"> 14. Ensure a renewed Economic Growth Strategy creates inclusive education and employment opportunities for Croydon residents, including those with protected characteristics who are most likely to be impacted socio-economically. 	<ul style="list-style-type: none"> 8. Fewer 16-18 year olds are not in education, employment or training. 9. 200 residents a year supported into work through Croydon Works. 10. There is an Increase In the number and range of apprenticeships and work placements provided by local employers.

Objective 5: Services are proactive in targeting groups that have accessibility issues.

Breaking down barriers to accessing services is vital if we are to ensure our residents have fair and equitable opportunities. These barriers can arise as a result of disability, age, mental health, language, digital and/ or physical barriers, and seeking asylum. We will continue to support access to translation and accommodate the needs of sight and hearing-impaired staff and members of the public. As digital access increases, we will continue to design services to best meet the needs of citizens, ensuring technology is an enabler rather than a barrier to service improvements and access. In recent years the Council has worked with community partners to support asylum seekers temporarily placed in the borough, including a disproportionately high number of unaccompanied asylum-seeking children. The support includes English for Speakers of other Languages (ESOL) provision, community integration and school places for these groups. The Council will continue to fulfil its duties to them whilst pressing government to fund the full cost of this support and to ensure accommodation standards are improved.

What actions will we take?	What will success look like?
<p>We will continue to:</p> <ul style="list-style-type: none"> 15. Raise awareness of our partner support services, such as for translation, interpretation, Braille, easy read and digital support and hearing impairment support. 16. Use data collected by services about accessibility to inform equality analyses. 17. Design services to best meet the needs of all residents, including an appreciation and mitigations to ensure residents do not become digitally excluded. 18. Support asylum seekers with access to English for Speakers of other Languages (ESOL) provision, community integration and school places for these groups. 	<ul style="list-style-type: none"> 11. The default for service user satisfaction surveys includes the collection and monitoring of protected characteristics. 12. Service assessments, user research and co-design are increasingly used as the basis of service improvements. 13. Digital services also offer alternative access routes for the digitally excluded. 14. Asylum seekers are able to integrate in the community.

OUTCOME THREE:

People in Croydon are supported to lead healthier and independent lives for longer

The Council's [Adult Social Care and Health Strategy 2022-25](#) details how we will achieve our vision for adult social care: residents should live as independent lives as possible; carers are supported in their caring role and our adults at risk of abuse or neglect are kept safe from harm. In delivering this strategy, our mission is to make the best use of available resources to keep people in Croydon safe and independent.

The strategic approach is to:

- Prevent need through universal services promoting wellbeing.
- Reduce need, with targeted interventions for those at risk.
- Delay need, through reablement, rehabilitation and recovery.
- Meet need through progressive planning, using a broad set of social resources.

We will identify and reduce any inequality in care quality or access to care, ensuring service users can experience positive outcomes and be supported with regard to physical and mental wellbeing. We will also support [Croydon's Autism Strategy 2021-24](#), developed with NHS partners and Croydon Mencap to make life easier for thousands of autistic residents and their families and increase awareness and understanding of autism across the whole of our population. In June 2023 Croydon became a dementia friendly borough. We will support Croydon's Dementia Strategic Plan developed with NHS partners and Croydon Dementia Action Alliance to make life easier for our residents living with dementia, their families and carers.

Objective 1: Work with partners to further tackle social isolation.

Multiple and complex risk factors can influence social isolation and loneliness. These range from level of education, employment status, wealth, income, housing, crime, ethnicity, gender, disability, age and mental health. These risks factors are more likely to affect some groups, such as people with mental health needs, people with dementia, refugees and asylum seekers. Taking on full time unpaid caring duties can also lead to being more isolated, with these roles likely to be performed by women. Social isolation and loneliness disproportionately affect groups that share protected characteristics and can compound discrimination and disadvantage they experience.

At a time when council budgets are stretched, work with the VCFS will be key to recognising untapped possibilities within every community. We will continue to encourage council staff to volunteer on social priorities in Croydon. We will also work with South West London Integrated Care Board and GP practices to support outreach services, work within communities to signpost socially isolated

people to services and promote online and offline directories of services. This can have a positive impact on mental health and social isolation and reduce the use of costly statutory services. We have commissioned a volunteering brokerage service which will enable VCFS organisations and others to access volunteers, and people who want to volunteer to find out local volunteering opportunities. Befriending is one of the categories of volunteering, which will help to reduce social isolation. We are also promoting volunteering as a form of social value to contractors and collaborating with Friends of Parks groups.

What actions will we take?	What will success look like?
<p>We will continue to:</p> <ol style="list-style-type: none"> 1. Work with VCFS partners to increase the number of volunteers and volunteering opportunities. 2. Work with Health partners to support outreach services and signpost socially isolated people to outreach and support services. <p>We will also:</p> <ol style="list-style-type: none"> 3. Develop a menu of volunteering options and encourage Council staff to use their volunteer days on social priorities, for example supporting work to reduce social isolation. 	<ol style="list-style-type: none"> 1. Council staff are aware of volunteering days, and we know the number of staff hours given. 2. Positive impacts on social isolation are reported from the beneficiaries of staff volunteering.

Objective 2: Work with our partners to understand and reduce health inequalities.

Health inequalities are avoidable, unfair and systematic differences in health between different groups of people. They can involve differences in health; access to care; quality and experience of care; behavioural risks to health (for example, smoking or alcohol use); and wider determinants of health (such as quality of housing or employment) (The King's Fund, 2022). The health inequalities that existed within Croydon before the Covid-19 pandemic have increased. The [Director of Public Health Report 2022](#) highlights differences in health outcomes between the most and the least deprived wards: in life expectancy at birth; low birth weight; obesity; emergency hospital admissions; the incidence of all cancers; and deaths. We want to close the gaps by identifying and tackling these issues at a local level using a collaborative approach and joint engagement from all partners and communities.

The Council will work with partners and the voluntary, community and faith sector to promote independence, health and wellbeing and keep vulnerable adults safe as set out in [Croydon's Health and Wellbeing Strategy 2019-2024](#). The strategy's overarching principles are: reducing inequalities (with people experiencing the worst health improving their health the fastest); focusing on prevention (which includes addressing avoidable harm caused by inequality); and increased integration (to provide joined up health and care services). We are currently reviewing the carers strategy due to be completed in 2024.

What actions will we take?	What will success look like?
<p>We will continue to:</p> <ol style="list-style-type: none"> 4. Work with partners to implement the Croydon Health and Wellbeing Strategy. 5. Listen to underserved groups and protected groups most likely to be impacted such as autistic people and people living with dementia and their carers, and take account of their views when we commission and develop health services. <p>We will also:</p> <ol style="list-style-type: none"> 6. Target health checks to eligible residents identified as high risk and/or living in areas of high deprivation. 7. Respond to the recommendations of the Director of Public Health Report 2022. 	<ol style="list-style-type: none"> 3. Earlier interventions across organisations to prevent greater support needs later in childhood for particular groups – e.g., those who are autistic. 4. The views of protected groups and particularly seldom heard groups such as autistic people and people living with dementia are taken into account when we commission and develop health services. 5. Increase in the number of delivery providers of health checks in the community.
<p>Objective 3: Work with our partners to ensure equitable access to health and care services and enable residents to know where and how to access services.</p> <p>Co-locating services makes it far easier for residents to access services, particularly in the health, care and community sector. By working with partners, we will continue to define, map and develop community hubs to bring support services closer to residents. As part of this, local people will be empowered to identify the needs most important to them and how they should be addressed. We work with social prescribers, social workers, voluntary, community and faith sector organisations and residents to support the development of hubs which bring together complementary services and make it easier for residents to access.</p>	
What actions will we take?	What will success look like?
<p>We will continue to:</p> <ol style="list-style-type: none"> 8. Work with partners to implement the Croydon Health and Wellbeing Strategy and develop a new strategy for 2024 onwards. 9. Continue to support the development of local community partnerships and hubs. 	<ol style="list-style-type: none"> 6. Raised awareness among residents around prevention and where and how they can receive support. 7. A Health Inequalities Outcomes Framework is developed and embedded in practice across partnership groups, e.g. Croydon Health and Care Board and Health and Wellbeing Board.

We will also:

10. Support the NHS to develop new Health Centres to increase access to primary care, community services and work with the voluntary sector, to reduce inequalities in access to health and social care across the borough.
11. Work as part of a Croydon system to reduce barriers to access mental health services and support shifts to more culturally appropriate provision, for example by maximising the impact of and amplifying the learning from the Ethnic Minority Health Improvement Project (EMHIP) work and South London Listens.
12. Develop an updated multi-agency harm reduction and suicide prevention strategy.

Key Statistics



- 390,727 current total population (highest in London)
- 406,650 population by 2031 and just under 500,000 by 2050.
- 0-19 years – 97,925 (highest in London)
- 20-64 years – 239, 761 (highest in London)
- 65+ - 53, 114 (3rd highest in London)
- 48% male
- 52% female

Croydon has the largest population of all the boroughs in London. The 2021 Census shows that its population has grown by 7.5% (27,349) since 2011 and life expectancy at birth is continuing to increase for both males and females.

For further information on the Croydon's population overview [click here.](#)

Age Profile in Croydon

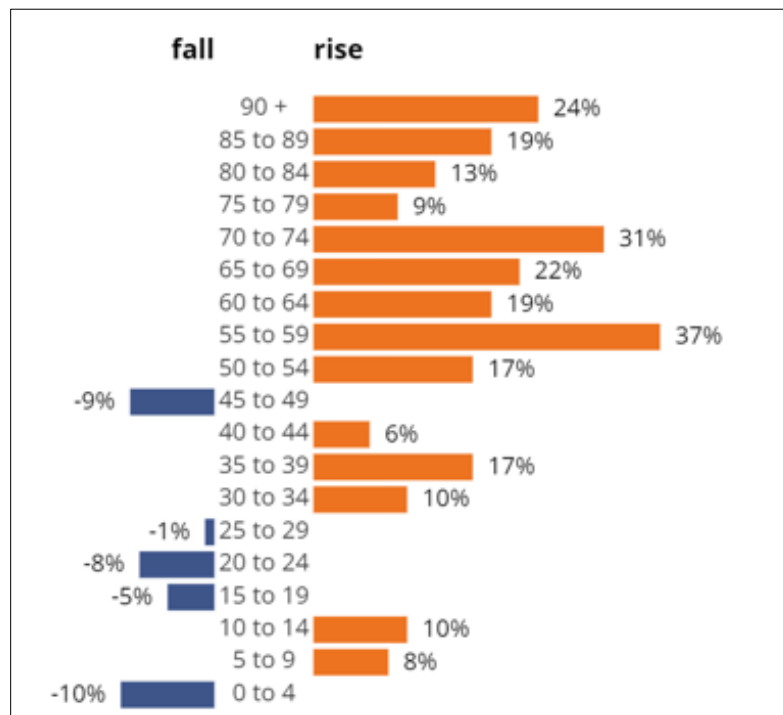
The 2021 Census shows that Croydon has the most people aged 0-19 years and 20-64 years in London, and the third most over-65s. The 0-19 age group makes up 25% of the borough's population, 20-64 year olds represent 61.4% of the borough's population and over 65s make up 13.6% of the Croydon population.

Croydon's large young population makes it the youngest borough in London. This has implications on the types of support that are required to cater to this demographic such as providing sufficient

education provision, training and employment opportunities, childcare and children's social care. The number of looked after children in Croydon remains the highest in London.

There has also been a large increase (19.7%) since 2011 in over-65s. This is much larger than the increases in other age groups, with only a 1.9% increase in people aged 0-15 and a 7% increase in people aged 16-64. The increase in people aged 75+ in particular has significant implications on adult social care costs, which are very high in Croydon in comparison to other London boroughs.

Population change (%) by age group in Croydon 2011-2021

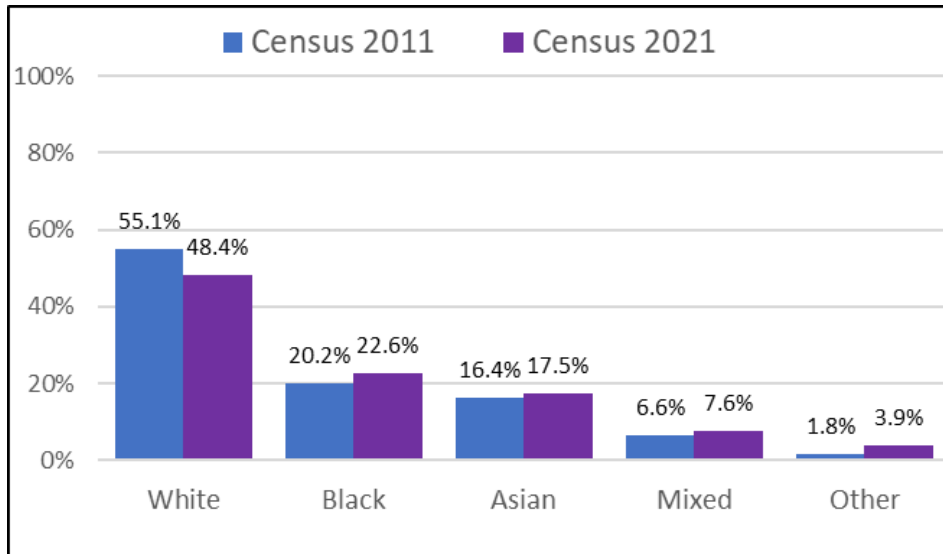


For a London borough, Croydon has the most care homes and until recently the most expensive cost per head for adult social care. This has implications on which types of residents can access quality care, in particular those with protected characteristics. However, Croydon’s cost per head is now falling more in line with the London and national averages which may improve accessibility.

For further information on children and young people in Croydon [click here](#). For further information on the overall age profile of the people in Croydon [click here](#).

Ethnicity

Change in Croydon’s broad ethnic group profile 2011-2021



Croydon is one of London’s most diverse boroughs with over half (51.6%) of its population from Global Majority and other racialised backgrounds. The figures for these ethnic groups have all increased

since 2011. The remaining 48.4% of Croydon’s population identify as white, which has decreased since 2011.

The large diversity of Croydon’s population has significant implications for equalities. The diverse needs of residents must be met across all areas of life in the borough, such as in education, employment, housing and social care.

For further information on Croydon’s breakdown by ethnicity [click here](#).

Deprivation

Croydon has become relatively less deprived compared to other local authorities in England between the Index of Multiple Deprivation (IMD) published in 2015 and the latest IMD from 2019. The proportion of income deprivation for under 15s and over 60s has decreased and there are fewer very deprived areas in Croydon under the three domains of Employment; Health deprivation & disability; and Education, skills & training.

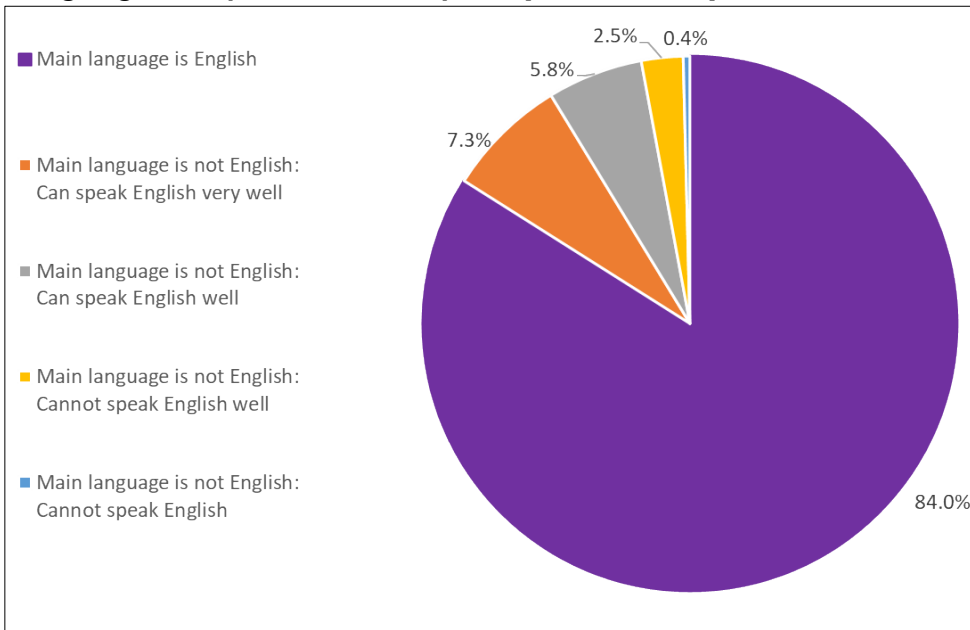
However, IMD 2019 reveals that Croydon is the most deprived of the six Southern Region boroughs in London. Crime remains relatively high across Croydon and under the Barriers to housing & services deprivation domain, more than a third (37.4%) of all LSOAs in Croydon have deprivation scores which put them into the top 10% most deprived LSOAs in the country for this domain. The North and East of the borough remain more deprived than the South.

Deprivation has negative implications on the economic position, health and access to opportunities for residents. It is important to

consider which groups may disproportionately struggle with deprivation, such as those from the Global Majority. Putting measures in place to reduce deprivation across Croydon will improve outcomes for its people and is likely to produce lower crime rates, with people less likely to engage in anti-social behaviour and less reliant on illegal methods to provide for themselves.

Proficiency in English

Language competence in Croydon (Census 2021)



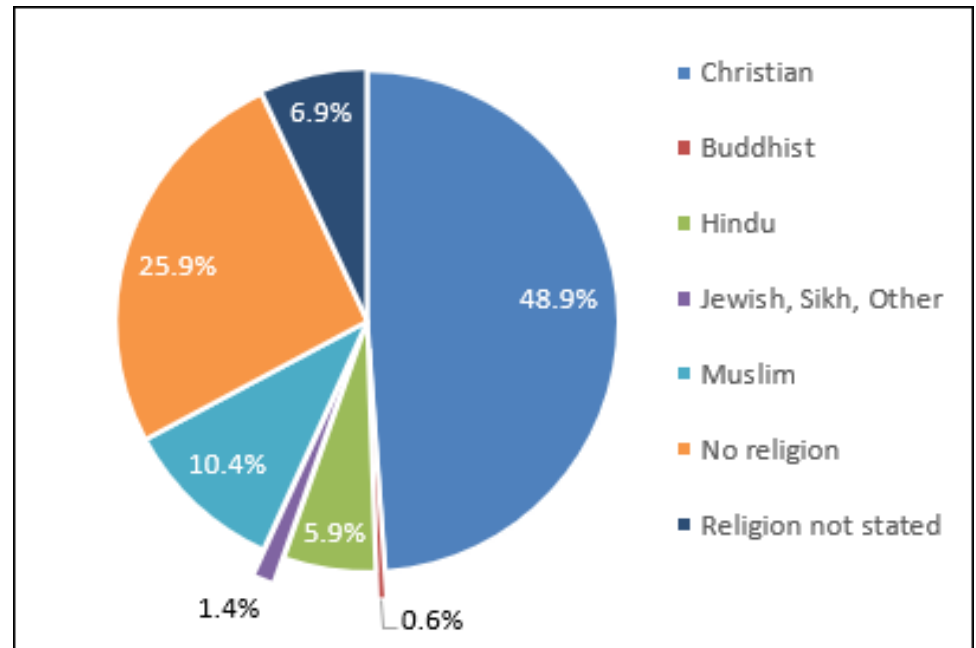
- The vast majority of Croydon’s population speak English, with only 2.9% of people unable to speak English well or at all.
- 16% of Croydon’s population have a main language other than English. 13% of this figure can speak English very well or well.
- Croydon has a much higher proportion of primary and secondary school pupils whose first language is not English compared to Croydon’s Statistical neighbours. Both these

proportions are greater than the national averages in primary (21%) and secondary schools (17%) over the last 5 years.

- Approximately 11,330 people do not speak the language well or at all. We should consider how to meet their needs and explore ways that English proficiency can be improved for this group, to widen their access to public life and reduce their dependency on others to meet their needs such as family members or carers.

Religion

Religion of Croydon residents (Census 2021)



The 2021 Census data shows a significant decline in practice of religion since 2011. Croydon’s Christian population has declined by 7.5% and there has been a 5.9% rise in people that don’t follow any

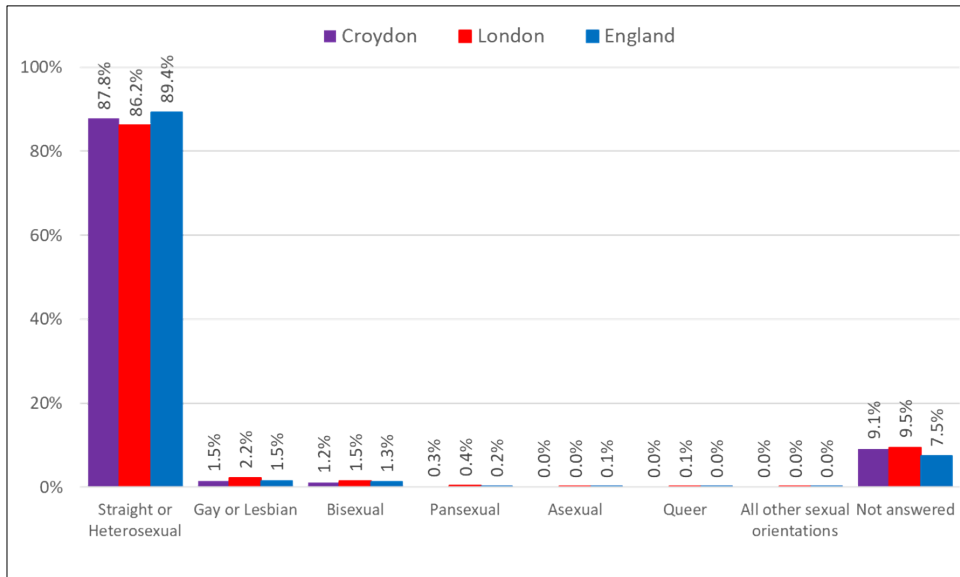
religion. The only religious group which has seen a noticeable increase is the Muslim community with a rise of 2.3%.

The implications of a decline in religious practice may include people of faith being less confident to publicly practise their religion and a lesser understanding in the wider public of religious practices.

For further information on Religion and Belief in Croydon [click here](#).

Sexual orientation

Sexual Orientation (16 year or above) Census 2021



Overall, 3.1% of Croydon respondents to the 2021 Census identified themselves as LGBT+, 1.5% as gay or lesbian, 1.2% bisexual and 0.4% all other sexual orientations. This is lower than the London averages. It is important to note that 9.1% of Croydon

respondents chose not to answer this question, which is also below the London average of 9.5%. This data was not captured in 2011.

Gender identity

In the 2021 Census, 0.2% of people in Croydon identified as a trans man, 0.2% as a trans woman, 0.5% identified differently to their sex registered at birth but gave no specific identity and 0.1% all other gender identities. These are all equivalent to the London averages. It is important to note however that 7.5% of respondents in Croydon chose not to answer this question.

This data was not captured in 2011. The Gender Identity and Research Society (<http://www.gires.org.uk/>) has estimated that nationally 1% of the population may be gender variant to some degree, with 0.2% of the population likely to seek medical treatment, at some stage, to present in the opposite gender.

Disability

The 2021 Census figures showed that 14% of the population in Croydon have a disability under the 2010 Equality Act. This is similar to the London average and below the national average.

8% of disabled Croydon residents said that their disability slightly limited their day-to-day activities, and the other 6% stated that it limited their day-to-day activities significantly. This is similar to the London and national averages.

For further information on individuals with long term health or a disability in Croydon [click here](#).



Education and Skills

Educational outcomes are important as they impact on the level of access to opportunities for people, the employment rates, the economic activity in the borough and levels of deprivation.

- Levels of permanent exclusions from primary and secondary schools are similar to the regional average and lower than the national average.
- Early Years Foundation Stage – the percentage of pupils achieving a good level of development (GLD) in Croydon has been improving every year since 2015 and is above average, nationally and regionally.
- Key Stage 1 – The performance of Croydon pupils achieving the expected standard in reading, writing, maths and science is below the London average for these four areas. However, excluding science, this is better than the national average in all these areas. (2021/22)
- Key Stage 2 - Attainment is improving in Croydon. 60% of pupils reached the expected standard in reading, writing and maths, which is below the London average (65%) but above the national average (58%) (2021/22).
- Take up of funded hours in early years settings is still below national and regional levels.
- Key Stage 4 - The average Attainment 8 score per pupil is 47.4, compared with the London average of 52.6 and national average of 48.8 (2021/22).
- Key Stage 5 - The proportion of pupils achieving grades AAB or above continues to be much lower than the regional and national averages.

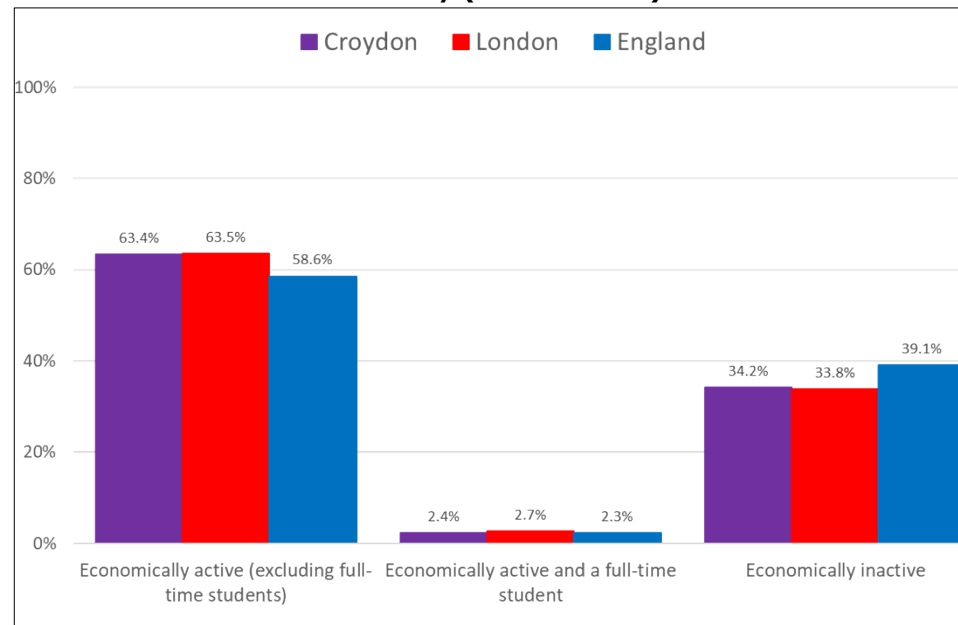


Economy

Croydon has a good level of economic activity but at the same time struggles with a very low job density. A lack of jobs in the borough may increase unemployment rates going forward and this would perpetuate inequalities. A weaker economic position for the people in Croydon may reduce their access to adequate housing, childcare and opportunities for training and education.

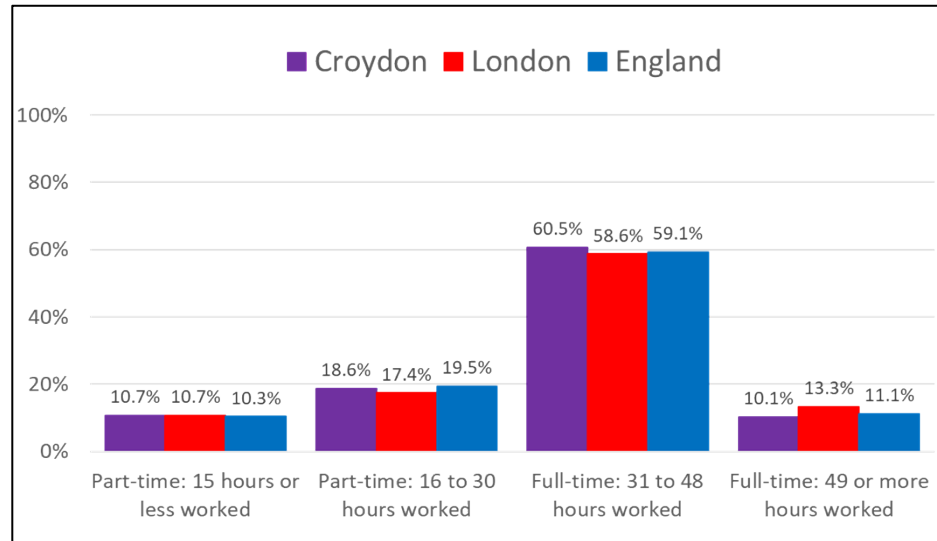
- Croydon's economic activity status is similar to London and above the national level, but job density is 0.55 (2021), much lower than London (1.02) and national (0.85) levels.

Individuals – economic activity (Census 2021)



- The proportion of out of work claimants is falling in all age ranges but is still higher than the regional and national averages.
- The number of businesses is falling but survival rates in Croydon are higher than the regional and national averages.
- The retail industry only makes up 10% of all Croydon industries. If Croydon is to attract more people, the retail offer needs to be improved.
- 70% of the Croydon workforce work fulltime for a minimum of 31 hours a week, and some of this cohort work in excess of 49 hours a week.
- 1 in 10 (9.6%) of Croydon’s working age population have never worked or been long-term employed. This is similar to the London average (10.1%).
- There has been a huge increase in unemployment for 18-24 year olds and 50-64 year olds since April 2020.

Individuals – hours worked (Census 2021)



Although Croydon is one of the more affordable boroughs in London, insufficient housing for groups such as the Global Majority and single parents is a significant challenge for Croydon. A lack of adequate housing perpetuates inequalities in other areas of life such as education, employment, and overall wellbeing.

- Croydon remains one of the more affordable areas live in London, for both buying and renting.
- As of the 2021 Census, Croydon has 152, 900 households which is the highest number in London.
- In 2020/21, Croydon was in the second quartile in London for providing affordable units of housing. In 2021/22, 338 of the 2,121 new dwellings built were affordable homes.
- In 2020/21, approximately three quarters of homeless households in Croydon were made up of residents from Global Majority and other racialised backgrounds.
- The percentage of care leavers in Croydon known to be in suitable accommodation is much lower than the regional and national figures.
- Social housing in Croydon is mainly concentrated in the northern parts and the eastern edge of the borough.
- Most people who approach the Council for help due to being homeless or at risk of homelessness are lone parents with dependent children. They currently make up just over 50% of the Council’s accepted cases for temporary accommodation.

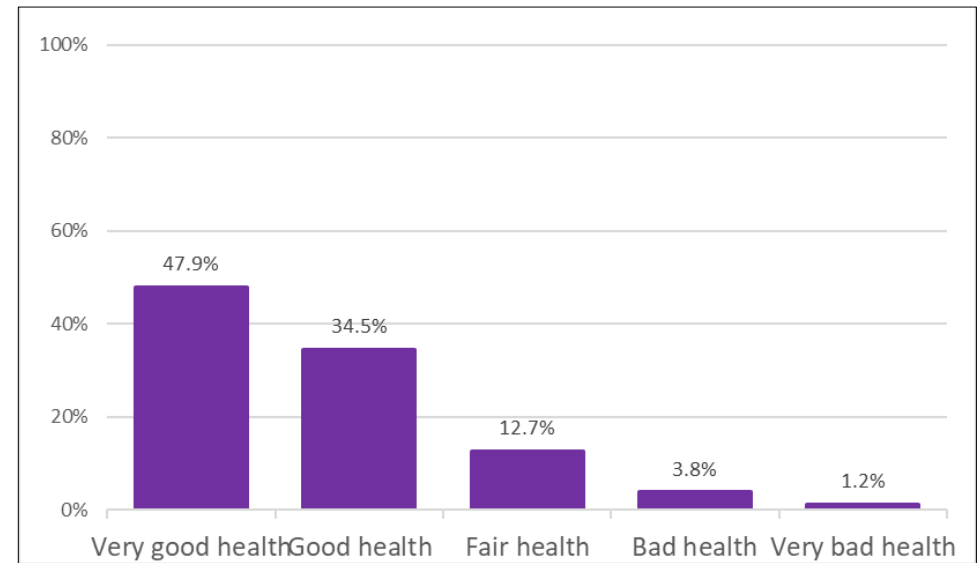


The average life expectancy has increased, which can be seen in the large proportion of Croydon residents who stated they are in very good or good health. This is a great sign of progress, but this also raises challenges on how to meet increased demand on services. Furthermore, a high proportion of overweight and obese adults may lead to increased costs for health services. Certain groups may face greater barriers to living a healthy lifestyle such as the Global Majority and those with disabilities, which must be considered when addressing health outcomes.

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- The majority of Croydon residents (82.4%) who answered the General Health question in the 2021 Census stated that they were in very good or good health.
- Over the last 5 years, the estimated dementia diagnosis rate for over 65s has been going up every year. For the past 2 years, this has been higher than the rate in London and England.
- The conception rate of under 18s is on a downward trend and is below the national average and close to the London average (2020 OHID Fingertips Public Health Data).
- Childhood immunisation rates continue to be lower in Croydon than across London and England.
- Croydon has the 7th highest proportion of adults (aged 18+) classified as overweight or obese in London. (2020/21).

General health in Croydon (Census 2021)



Croydon Equalities Pledges

The Croydon Equalities Pledges have been created so that organisations can reinforce the borough's commitment to treat everyone equally and fairly and giving them the freedom to be who they are.

Equalities Pledge

1. Positively promote the equality of opportunity for individuals of all characteristics namely: disability, gender, race, age, sexual orientation, religion and belief, marriage and civil partnership and gender identity, by recognising significant celebrations and awareness days and ensuring that workplace practices do not discriminate against any groups.
2. Ensure that there is mandatory training for all staff at all levels in equality, diversity and inclusion every two years, attendance is monitored, and 100% targets set with staff and managers held to account.
3. Ensure a zero-tolerance approach to all forms of discrimination, harassment and bullying, publicising the staff code of conduct, providing staff with information on what it is and encouraging people to safely challenge this where it occurs ensuring that people are not treated less favourably for doing so.
4. Positively encourage applications from diverse and under-represented groups when advertising for posts and taking actions to respond to under representation in this area identified by organisational data.
5. Use anonymous recruitment processes which don't reveal details of race, age, gender, disability or socio-economic status.
6. Identify and annually publish pay gaps based on ethnicity, disability and gender and putting actions in place to reduce such pay gaps.
7. Provide reasonable adjustments for disabled staff in interviews and employment.
8. Develop and agree an equality policy for the organisation which all staff sign up to and review it every 3 years.
9. Collect data on the protected characteristics of staff and aiming to have a workforce which reflects the Croydon community by using positive action recruitment practices and encourage career development for underrepresented staff.
10. Undertake annual staff surveys to identify the impact of organisational actions on employees lived experience and psychological safety at work.

George Floyd Race Matters Pledge

1. We are working to become an anti-racist organisation by embedding this in our strategies, actions and behaviours and by making a difference to the lived experience of our communities.
2. Committing to zero tolerance of racism from employees, residents, customers and service users by challenging racist behaviour or stereotypes expressed by individuals.

3. Developing our knowledge of anti-racist practice by listening and responding to experiences of staff and the wider community.
4. Developing an understanding of the role that power, privilege, identity and disadvantage that impacts on the lived experience of all staff in particular those from African/African Caribbean, other African heritage communities.
5. Undertaking whole workforce training on unconscious bias and encouraging staff to safely challenge such bias during day to day conversations.
6. Developing cultural awareness by learning more about African/African Caribbean and African other history and cultural practices to develop understanding of staff and customers through podcasts, videos, documentaries and by attending events.
7. Promoting good relationships between groups which share cultural similarities and those that don't by encouraging communities to celebrate together as one.
8. Identifying and addressing any ethnicity pay gaps.
9. Ensuring that recruitment processes from application, shortlisting, interview and appointment conducted in a manner that facilitates positive action in recruitment such as media campaigns, advertising imagery and interview panels that represent the diversity of the borough's population where possible.
10. Developing plans to address challenges where race may not be the only factor and the needs of people may also be in relation to: disability, age, sexual orientation, sex or other protected characteristics.

Glossary

Ally

An individual who supports and advocates for people from a protected characteristic that is not their own (typically) straight and/or cis person who supports members of the LGBT community.

Antisemitism

The following working definition of antisemitism by the International Holocaust Remembrance Alliance was adopted by the Council in [2018](#):

“Antisemitism is a certain perception of Jews, which may be expressed as hatred toward Jews. Rhetorical and physical manifestations of antisemitism are directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions and religious facilities.”

Manifestations might include the targeting of the state of Israel, conceived as a Jewish collectivity. However, criticism of Israel similar to that levelled against any other country cannot be regarded as antisemitic. Antisemitism frequently charges Jews with conspiring to harm humanity, and it is often used to blame Jews for “why things go wrong.” It is expressed in speech, writing, visual forms and action, and employs sinister stereotypes and negative character traits.

Contemporary examples of antisemitism in public life, the media, schools, the workplace, and in the religious sphere could, taking into account the overall context, include, but are not limited to:

- Calling for, aiding, or justifying the killing or harming of Jews in the name of a radical ideology or an extremist view of religion.
- Making mendacious, dehumanizing, demonizing, or stereotypical allegations about Jews as such or the power of Jews as collective — such as, especially but not exclusively, the myth about a world Jewish conspiracy or of Jews controlling the media, economy, government or other societal institutions.
- Accusing Jews as a people of being responsible for real or imagined wrongdoing committed by a single Jewish person or group, or even for acts committed by non-Jews.
- Denying the fact, scope, mechanisms (e.g. gas chambers) or intentionality of the genocide of the Jewish people at the hands of National Socialist Germany and its supporters and accomplices during World War II (the Holocaust).
- Accusing the Jews as a people, or Israel as a state, of inventing or exaggerating the Holocaust.
- Accusing Jewish citizens of being more loyal to Israel, or to the alleged priorities of Jews worldwide, than to the interests of their own nations.
- Denying the Jewish people their right to self-determination, e.g., by claiming that the existence of a State of Israel is a racist endeavour.
- Applying double standards by requiring of it behaviour not expected or demanded of any other democratic nation.

- Using the symbols and images associated with classic antisemitism (e.g., claims of Jews killing Jesus or blood libel) to characterize Israel or Israelis.
- Drawing comparisons of contemporary Israeli policy to that of the Nazis.
- Holding Jews collectively responsible for actions of the state of Israel.

Cisgender or cis

Someone whose gender identity is the same as the sex they were assigned at birth. Non-trans is also used by some people.

Discrimination and Harassment

- Discrimination is treating someone less favourably based on their membership of a protected characteristic (for example, because of your gender, race or disability) [[EHRC](#)].
- Harassment is unwanted attention that violates the dignity of individuals and creates an intimidating, offensive and hostile environment. This may range from mildly unpleasant remarks to physical violence [[EHRC](#)].

Diverse or diversity

A mix of different kinds of people in the broadest sense, encompassing both physical and intrinsic differences including, young and old people, disabled and non-disabled people, occupations, personalities, or family composition [[EHRC](#)].

Duties

These are things the law says a public body must do.

Equality

Creating a fairer society where everyone can participate and fulfil their potential. It is part of a legislative framework which addresses unfair discrimination.

Equity

This term acknowledges that we don't all start at the same starting point, so adjustments can be used to redress the balance.

Equality Duty

As a public body, the Council is required to comply with the Public Sector Equality Duty [PSED], as set out in the Equality Act 2010. The PSED requires the Council to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. Failure to meet these requirements may result in the Council being exposed to costly, time consuming and reputation-damaging legal challenges.

Gender reassignment

A person has the protected characteristic of gender reassignment if the person is proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex [[Equality Act 2010, Section 7\(1\)](#)].

Global Majority

A collective term for people who identify as African, Asian, African Caribbean, Dual Heritage or originating from the Global South. The phrase 'Global South' refers broadly to the regions of Latin America, Asia, Africa and Oceania. It refers to countries many of which were previously termed 'Third World' and 'Periphery'. It refers to regions outside Europe and North America that are mostly (though not exclusively) low-income countries, often politically or culturally marginalised. Globally this community currently represents approximately 80% of the world's population [Rosemary Campbell-Stephens MBE, Leeds Beckett University].

Good Level of Development (GLD)

GLD is the most widely used single measure of child development in the early years. It is a measure of attainment, not progress.

Inequity

This means lack of fairness and/or justice.

Inclusion

The practice or policy of providing equal access to opportunities and resources for people who might otherwise be excluded or marginalised, such as those who have physical or mental disabilities and members of other minority groups.

Indices of multiple deprivation (IMD)

Indices of multiple deprivation are widely used datasets within the UK to classify the relative deprivation of small areas. Multiple components of deprivation are weighted with different strengths and compiled into a single score of deprivation. [[GOV.UK](#)]

Islamophobia

The following working definition, developed by the All-Party Parliamentary Group on British Muslims, was adopted by the Council in [2021](#):

“Islamophobia is rooted in racism and is a type of racism that targets expressions of Muslimness or perceived Muslimness.”

Contemporary examples of Islamophobia in public life, the media, schools, the workplace, and in encounters between religions and non-religions in the public sphere could, taking into account the overall context, include, but are not limited to:

- Calling for, aiding, instigating or justifying the killing or harming of Muslims in the name of a racist/fascist ideology, or an extremist view of religion.
- Making mendacious, dehumanizing, demonizing, or stereotypical allegations about Muslims as such, or of Muslims as a collective group, such as, especially but not exclusively, conspiracies about Muslim entryism in politics, government or other societal institutions; the myth of Muslim identity having a unique propensity for terrorism, and claims of a demographic 'threat' posed by Muslims or of a 'Muslim takeover'.
- Accusing Muslims as a group of being responsible for real or imagined wrongdoing committed by a single Muslim person or group of Muslim individuals, or even for acts committed by non-Muslims.
- Accusing Muslims as a group, or Muslim majority states, of inventing or exaggerating Islamophobia, ethnic cleansing or genocide perpetrated against Muslims.
- Accusing Muslim citizens of being more loyal to the 'Ummah' (transnational Muslim community) or to their countries of origin, or to the alleged priorities of Muslims worldwide, than to the interests of their own nations.
- Denying Muslim populations the right to self-determination e.g., by claiming that the existence of an independent Palestine or Kashmir is a terrorist endeavour.
- Applying double standards by requiring of Muslims behaviours that are not expected or demanded of any other groups in society, e.g. loyalty tests.
- Using the symbols and images associated with classic Islamophobia (e.g. Muhammad being a paedophile, claims of Muslims spreading Islam by the sword or subjugating minority groups under their rule) to characterize Muslims as being 'sex groomers', inherently violent or incapable of living harmoniously in plural societies.
- Holding Muslims collectively responsible for the actions of any Muslim majority state, whether secular or constitutionally Islamic.

LGBT (lesbian, gay, bi, trans)

- **Lesbian** - Refers to a woman who has a romantic and/or sexual orientation towards women. Some non-binary people may also identify with this term.
- **Gay** - Refers to a man who has a romantic and/or sexual orientation towards men. It is also a generic term for lesbian and gay sexuality - some women define themselves as gay rather than lesbian. Some non-binary people may also identify with this term.
- **Bi** - Bi is an umbrella term used to describe a romantic and/or sexual orientation towards more than one gender. Bi people may describe themselves using one or more of a wide variety of terms, including, but not limited to, bisexual, pan, queer, and some other non-monosexual and non-monoromantic identities.
- **Trans** - An umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth. Trans people may describe themselves using one or more of a wide variety of terms, including (but not limited to)

transgender, transsexual, gender-queer (GQ), gender-fluid, non-binary, gender-variant, crossdresser, genderless, a gender, nongender, third gender, bi-gender, trans man, trans woman, trans masculine, trans feminine and neutrois.

LSOAs

A Lower Super Output Area typically contains around 1,500 residents. Super output areas produce a set of areas of consistent size, whose boundaries would not change (unlike electoral wards), suitable for the publication of data such as the Indices of Deprivation. [\[ONS\]](#)

Marriage and civil partnership

Marriage and Civil Partnership means someone who is legally married or in a civil partnership. Marriage can either be between a man and a woman, or between partners of the same sex. Civil partnership is between a man and a woman, or of partners of the same sex [\[EHRC\]](#).

Minoritised

This refers to groups who have been oppressed by social power structures and systems. The term may be used to describe the LGBT+ community, disabled people, women and groups experiencing poverty or who are affected by socio economic impact. Minoritised groups may also be racialised groups; however, the term minoritised has wider implications.

Pregnancy and maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding. [\[EHRC\]](#)

Protected characteristics

These are the grounds upon which discrimination is unlawful. The characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Public bodies

Public bodies include government departments, schools, hospitals and councils.

Racialised groups

This refers to racial groups that have been racialised by the structural and social power structures. This term is often used by academics.

Vulnerability

A combined range of factors could make people more vulnerable or place them in situations that lead to greater vulnerability. For example, some people are vulnerable due to a particular condition such as mental or physical illness as well find themselves placed in vulnerable situations such as living in a poor area with a lack of access to jobs, healthcare or housing. It is a combination of social and economic factors that place them at a disadvantage.

London Local Government Anti-Racism Statement

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Purpose of statement, how it was developed, what next?

- To ensure there is a consistent approach across London, adopted by all local authorities, that is further underpinned by the CELC Tackling Racial Inequality Standards.
- The primary audience is the public and stakeholders who can hold local government to account.
- The statement has been developed by a working group of officers convened by CELC. We started by generating ideas about the key features we would want to see in a statement. This enabled some very open discussion about what to include and why. The statement was then refined over the course of two sessions.
- It has been reviewed by all other working groups on the Tackling Racial Inequality programme.
- The Anti-Racist Statement and CELC Standard was tabled at CELC on 21 October 2022 and we gained with regards to authorities adopting the statement and further.
- The Anti-Racist Statement and CELC Standard was briefed to Leader's on 24 October 2022 with the aiming of achieving sign-off by 13 Dec 2022 Leaders' Committee.

The statement

Local authorities in London are committed to achieving racial equality because we recognise that persistent racial inequalities are unacceptable and adversely affect all Londoners.

We know that certain groups are more likely to face inequality, experience poor outcomes and to live in poverty than others. Often these outcomes are used as an excuse not to acknowledge racial inequality, but groups are not more disadvantaged by chance. Structural disadvantage is rooted in racism and discrimination that is both historical and current.

We do have legislation to protect against overt racism, negative attitudes and treatment, but many of the systems that discriminate do so because of more subtle and covert unchecked “prejudice, assumptions, ignorance, thoughtlessness and racist stereotyping.”

This wording draws on the Macpherson Report 1999 definition of institutional racism which is still relevant today. This is a dehumanising process that is unacceptable and communities are tired of being treated this way. We cannot let another generation down by not actively responding to what remains a clear and compelling articulation of what needs to change.

Why it matters that we take an anti racist approach

All local authorities should be committed to taking an anti-racist approach because the most damaging aspects of inequality and racism are embedded in society. It is not enough to “not be racist” or to focus on tackling conscious hatred, like racial abuse. It is everyone’s responsibility to proactively and continuously:

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- Unpack and reset beliefs, assumptions and values;
- Take action when we observe racism come into play, in beliefs, assumptions and values and the decision and actions that follow, however subtle;
- Be humble and educate ourselves in what we don’t know about racial inequalities and racism that exists, rather than putting the onus on others to educate us.

The commitment

Our collective commitment to achieve racial equality focuses on what London councils can do together to have a positive impact on life outcomes at all stages, including in relation to health and wellbeing, employment and education. This is about social justice and promoting equality because all Londoners should be able to reach their potential in all spheres.

To be proactive in meeting this commitment, we expect all local authorities to:

1. Build a picture of what the key inequalities are in their area and look at what is driving these.
2. Shape solutions by listening to residents, communities and frontline staff and by responsibly drawing on their lived experience to understand what the issues are and what works, without putting the burden on them to educate us.
3. Set expectations of leaders to make the connection between achieving positive outcomes, their own leadership style and diversity, and to take personal responsibility for what they can do now to bring about change. This acknowledges that residents have worked hard to achieve social justice and rightly expect to see leadership that reflects their position, to see action, and to be part of solution.

The common approach

This commitment to achieve racial equality should be publicly adopted by all local authorities using a consistent approach driving change. Everyone should:

1. Work together as a whole system across London and influence other public bodies and civil society to adopt a common commitment and approach to tackling racial inequality.
2. Build on strengths in communities and be ready to devise solutions with them.
3. Focus on changing our institutional leadership and organisational cultures.
4. Understand and acknowledge that racism is a form of trauma, which impacts on individuals and communities, and can also be intergenerational and that the answer is not just about support for individuals but undoing the systems and processes within our organisations which continue to do harm.
5. Use the disaggregated data intelligently to inform policy and planning. We need to look at where there are patterns of discrimination experienced by ethnically diverse groups, but also move beyond the 'broad brush' data about communities from Black, Asian and Multi-Ethnic backgrounds. This means understanding specific needs, impacts and experiences of distinct groups and taking an intersectional approach to identifying and tackling issues by recognising that there is diversity within all groups: socio-economic background; gender; sexuality; faith and other identities that can exacerbate and compound racial inequalities. A central component and initial step is for all local authority to openly publish ethnicity pay data.

Equality Analysis Form

1. Introduction

1.1 Purpose of Equality Analysis

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

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

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

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

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

2. Proposed change

Directorate	Assistant Chief Executive
Title of proposed change	Equality Annual Report 2023 and Updated Croydon Equality Strategy 2023-27
Name of Officer carrying out Equality Analysis	Denise McCausland

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Briefly summarise the proposed change and why it is being considered/anticipated outcomes. What is meant to achieve and how is it seeking to achieve this? Please also state if it is an amendment to an existing arrangement or a new proposal.

- 1.1** This Equality Strategy refresh seeks to build on the foundations of the 2020-2024 Strategy, reflect the results of those changes and embed the initiatives the Council has introduced since 2021. For example, the adoption of the George Floyd Race Matters Pledge and the Croydon Equality Pledge has introduced new areas of focus for our equalities work; a new People and Cultural Transformation Strategy has been agreed, including a pillar of work focused on “building an equality driven, diverse and inclusive workplace;” and the Council has also participated as a pilot organisation on the Chief Executives London Committee (CELC) Tackling Racial Inequality Programme. Each of these initiatives and others have been incorporated in the refreshed Strategy, which has also been aligned with the Mayor’s Business Plan, adopted by Council in 2022.
- 1.2** The four outcomes of the original strategy have been reduced to three and the objectives redistributed between the remaining outcomes. It is the actions, performance measures and narrative that have been updated. In addition, there are slight amendments to Outcome 3 (formerly Outcome 4) to better reflect the Council’s responsibilities for health and social care, and two additional objectives under Outcome 1, to deepen accountability and effect systemic change within the authority, and to become an anti-racist organisation.
- 1.3** The original Strategy was based on 2011 Census data as this was the latest available at the time of adoption. The refresh uses data from the 2021 Census, giving a more accurate picture of the challenges in Croydon.
- 1.4** The Equality Annual Report enclosed in the cabinet report sets out a summary of progress made against each outcome in the current Strategy as well as key challenges facing the organisation.

The refreshed Equality Strategy will provide a framework for the Council to take positive action for all underrepresented characteristics both as an employer and a community leader, leading to equality of opportunity both in the organisation and the borough alike. The

Strategy sets out clear actions the Council take over the period to 2027. The Annual report details the actions undertaken to enhance equality in the borough in the year 2022-23.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Deciding whether the potential impact is positive or negative

Table 1 – Positive/Negative impact

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	<p>The Equality Strategy will have a positive impact on age. The council has an older workforce and needs to attract younger employees. Work is currently being undertaken on the People Strategy which is intended to increase underrepresented young people who only make up 2% of the workforce at aged 24 and under.</p> <p>A new young professional Staff Network Group to listen to the views and recommendations from younger staff was established during 2022.</p>		<p>According to the 2021 census, the split of ages across all wards in Croydon are somewhat comparable with each other. An outlier to note is Fairfield has a considerably lower average age than the rest of the borough's wards.</p>

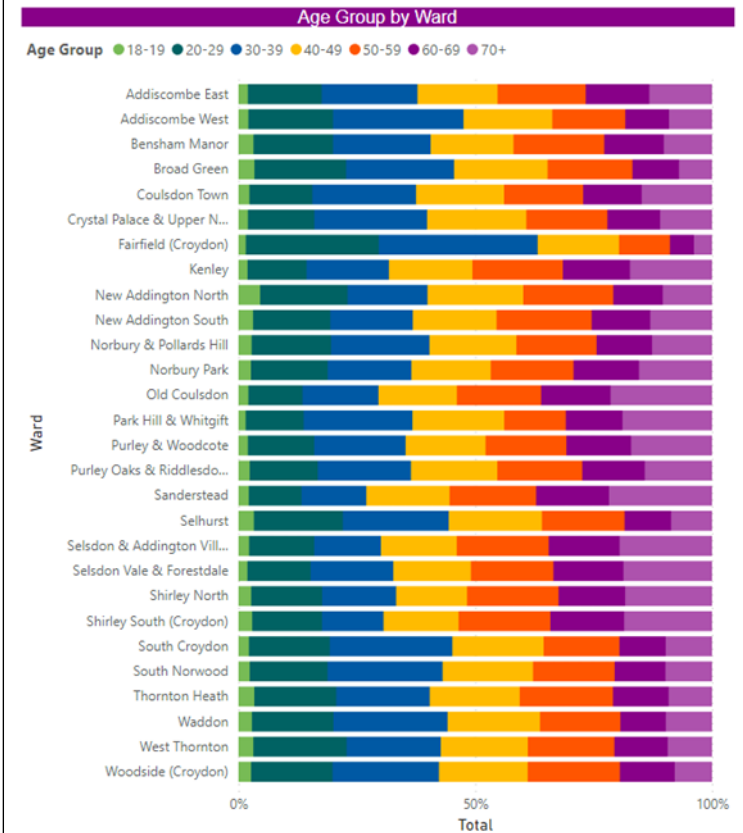
Diverse interview panels where possible will include younger panel members.

The Council will develop a youth safety plan with partners and young people to reduce serious youth violence and exploitation.

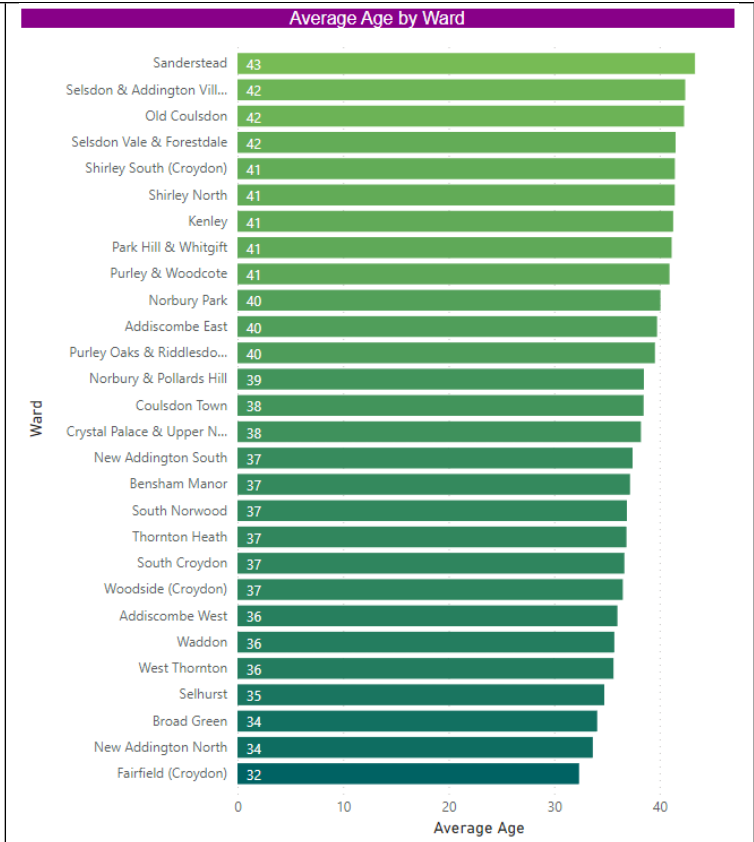
In partnership with the health service, work with education and training settings to listen to the voice of children and young people on their mental wellbeing, the availability of pastoral and therapeutic support in schools, and their links to support networks outside schools.

Working with the South London Partnership, we will use the Work and Health Programme to ensure that residents with disabilities, care leavers and those further away from the job market receive targeted personalized support into employment.

The requirements that recruitment panels are diverse is applicable to this and other characteristics, the impact of which will be monitored by the EDI Board.



The average age by ward is shown below, again noting Fairfield has the lowest average age.



Earnings by age

Whilst it is difficult to obtain data on Croydon specifically there are datasets available from the ONS which review earnings by age at a higher level.

From the below it is shown that in London and in the South East in full-time employment lower income ages are 18 to 29.

			<table border="1"> <caption>Median Salary by Age</caption> <thead> <tr> <th>Age Group</th> <th>London (£)</th> <th>South East (£)</th> </tr> </thead> <tbody> <tr> <td>Age 18-21</td> <td>436</td> <td>389</td> </tr> <tr> <td>Age 22-29</td> <td>644</td> <td>519</td> </tr> <tr> <td>Age 30-39</td> <td>874</td> <td>671</td> </tr> <tr> <td>Age 40-49</td> <td>908</td> <td>729</td> </tr> <tr> <td>Age 50-59</td> <td>825</td> <td>697</td> </tr> <tr> <td>Age 60+</td> <td>697</td> <td>606</td> </tr> </tbody> </table>	Age Group	London (£)	South East (£)	Age 18-21	436	389	Age 22-29	644	519	Age 30-39	874	671	Age 40-49	908	729	Age 50-59	825	697	Age 60+	697	606
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<p>Disability</p>	<p>The council is seeking to explore the impact of ableism on disabled staff, in particular regarding the psychological impact of disability in the workplace and the arrangements for reasonable adjustments for disabled staff, Work is also taking place to understand neurodiversity and the impact of hybrid working on non-neurotypical staff.</p> <p>The refreshed Equality Strategy and the recently agreed People and Culture strategy, which is incorporated into the Equality</p>		<p>The pay gap in relation to disability in 2022 was -1.2% in terms of mean pay and 0.0% in terms of median pay.</p> <p>Non-disclosure- prefer not to say 1.41% Not specified – 21.82</p> <p>The employment of disabled people 2021 - GOV.UK (www.gov.uk)</p> <p>The ONS Census 2021 states that 14.8% of Croydon residents are disabled, a population of 390k would put the disabled population at approximately 58k.</p>																					

Strategy, will establish Positive Action training for underrepresented groups. The strategy aims to improve the lived experience of disabled staff in the workplace. This includes ensuring that reasonable adjustments are in place for staff and that there is a reduction in the number of disability employment tribunal cases.

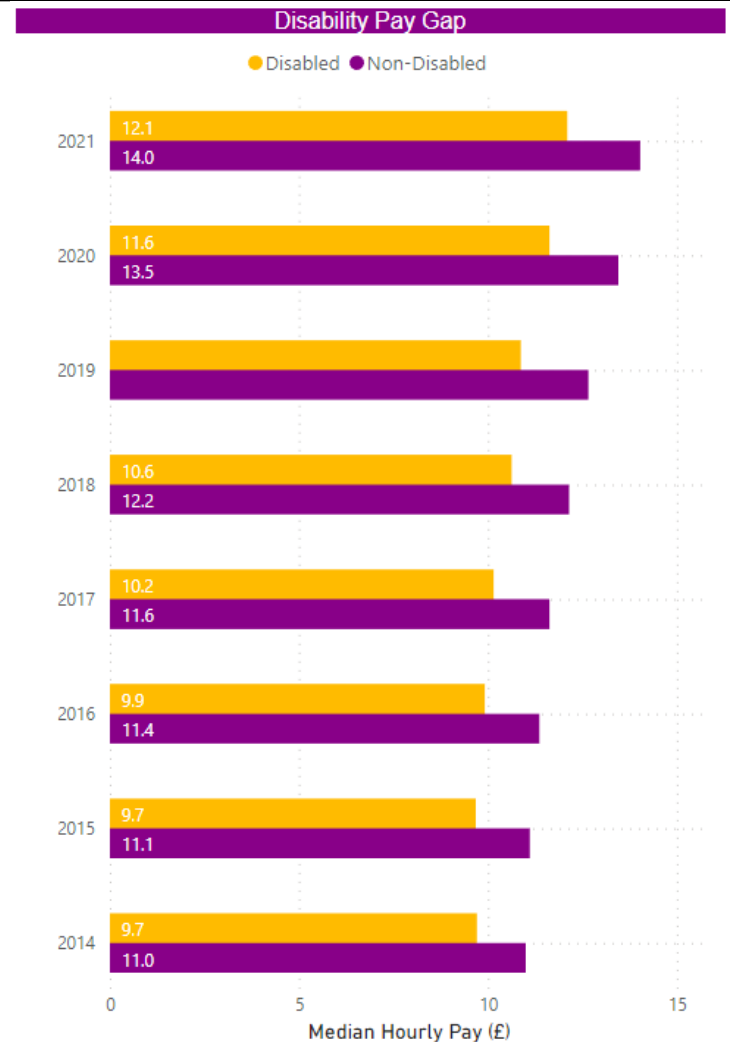
Working with the South London Partnership, we will use the Work and Health Programme to ensure that residents with disabilities, care leavers and those further away from the job market receive targeted personalized support into employment.

The requirements that recruitment panels are diverse is applicable to this and other characteristics, the impact of which will be monitored by the EDI Board.

Like other minorized groups, it is intended that Disabled groups are fully engaged in the Borough of Culture events.

Although 12% of staff within tier 1-3 have disclosed a disability, this figure is still lower than the resident population.

As of 2021 disability pay gaps for mean and median calculations are very low with no pay gap reported for the median calculation.



From the chart above it can be seen that having a disability is more likely to mean a lower hourly wage.

However, that is not the case for all disabilities, in fact some disabled categories in 2021 were earning a higher median hourly wage than non-disabled workers

			<table border="1"> <caption>Disability Pay Gap Data</caption> <thead> <tr> <th>Condition</th> <th>Sum of Median Pay (£)</th> <th>Median Non-Disabled Pay (£)</th> </tr> </thead> <tbody> <tr><td>Difficulty in hearing</td><td>14.7</td><td>14.0</td></tr> <tr><td>Severe disfigurements/skin conditions/allergies</td><td>14.4</td><td>14.0</td></tr> <tr><td>Difficulty in seeing</td><td>14.0</td><td>14.0</td></tr> <tr><td>No long-lasting health condition or not disclosed</td><td>14.0</td><td>14.0</td></tr> <tr><td>Other problems or disabilities</td><td>13.0</td><td>14.0</td></tr> <tr><td>Heart/blood pressure or blood circulation problems</td><td>13.0</td><td>14.0</td></tr> <tr><td>Stomach/liver/kidney or digestion problems</td><td>13.0</td><td>14.0</td></tr> <tr><td>Problems or disabilities connected with back and neck</td><td>12.7</td><td>14.0</td></tr> <tr><td>Progressive illness n.e.c</td><td>12.6</td><td>14.0</td></tr> <tr><td>Diabetes</td><td>12.5</td><td>14.0</td></tr> <tr><td>Chest or breathing problems/asthma/bronchitis</td><td>12.0</td><td>14.0</td></tr> <tr><td>Problems or disabilities connected with arms or hands</td><td>11.9</td><td>14.0</td></tr> <tr><td>Problems or disabilities connected with legs and feet</td><td>11.8</td><td>14.0</td></tr> <tr><td>Depression/bad nerves or anxiety</td><td>11.5</td><td>14.0</td></tr> <tr><td>Mental illness or other nervous disorders</td><td>10.9</td><td>14.0</td></tr> <tr><td>Epilepsy</td><td>10.5</td><td>14.0</td></tr> <tr><td>Severe or specific learning difficulties</td><td>9.9</td><td>14.0</td></tr> <tr><td>Autism</td><td>9.3</td><td>14.0</td></tr> </tbody> </table>	Condition	Sum of Median Pay (£)	Median Non-Disabled Pay (£)	Difficulty in hearing	14.7	14.0	Severe disfigurements/skin conditions/allergies	14.4	14.0	Difficulty in seeing	14.0	14.0	No long-lasting health condition or not disclosed	14.0	14.0	Other problems or disabilities	13.0	14.0	Heart/blood pressure or blood circulation problems	13.0	14.0	Stomach/liver/kidney or digestion problems	13.0	14.0	Problems or disabilities connected with back and neck	12.7	14.0	Progressive illness n.e.c	12.6	14.0	Diabetes	12.5	14.0	Chest or breathing problems/asthma/bronchitis	12.0	14.0	Problems or disabilities connected with arms or hands	11.9	14.0	Problems or disabilities connected with legs and feet	11.8	14.0	Depression/bad nerves or anxiety	11.5	14.0	Mental illness or other nervous disorders	10.9	14.0	Epilepsy	10.5	14.0	Severe or specific learning difficulties	9.9	14.0	Autism	9.3	14.0
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<p>Sex</p>	<p>The Women’s Staff Network group is thriving and has arranged several whole work force learning events. A menopause group has also been established and events are open for staff of both sexes.</p> <p>As set out in the Annual report, during 2022 a Men’s health event took place which specifically focused on men’s mental health and was supported by senior officers. Ap</p> <p>The refreshed Equality Strategy and the recently agreed People and Culture strategy, which is incorporated into the Equality Strategy, will establish Positive Action training for underrepresented</p>		<p>Council Corporately, 67.73% of staff are female and 32.27% are male.</p> <p>The Council has closed the pay gap in relation to gender. In 2022/23 the Council had zero gender pay gap.</p> <p>Croydon borough</p> <p>Croydon is split 52% female and 48% male according to the ONS Census from 2021.</p> <p>As shown below, broken down by ward, every ward in Croydon has a higher population of females than males with exception to Fairfield.</p>																																																									

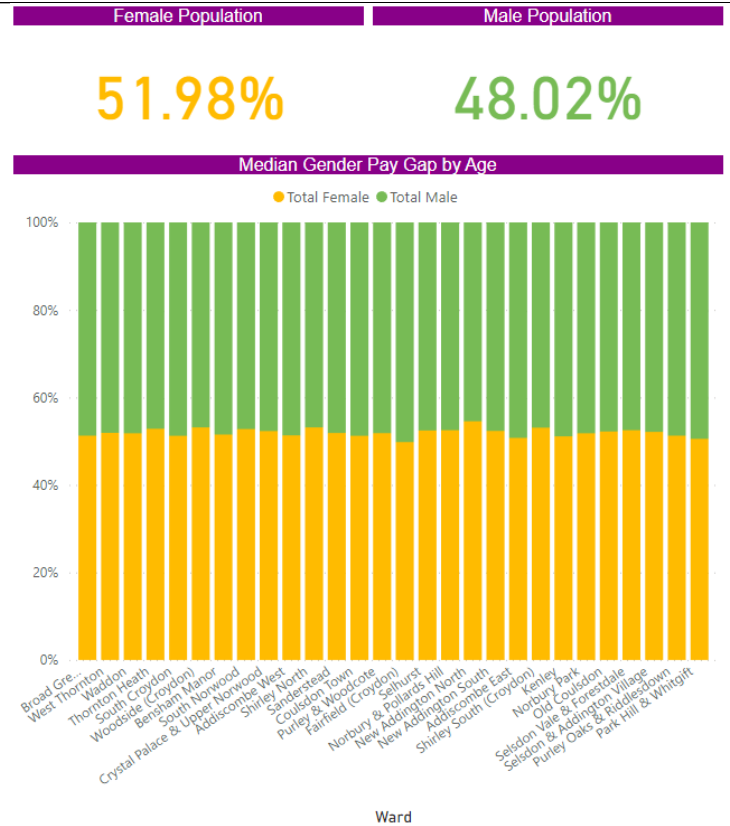
groups.

It also important to look at be mind full of issues around intersectionality where there are employees affected by changes in relation to both sex and age and sex and race.

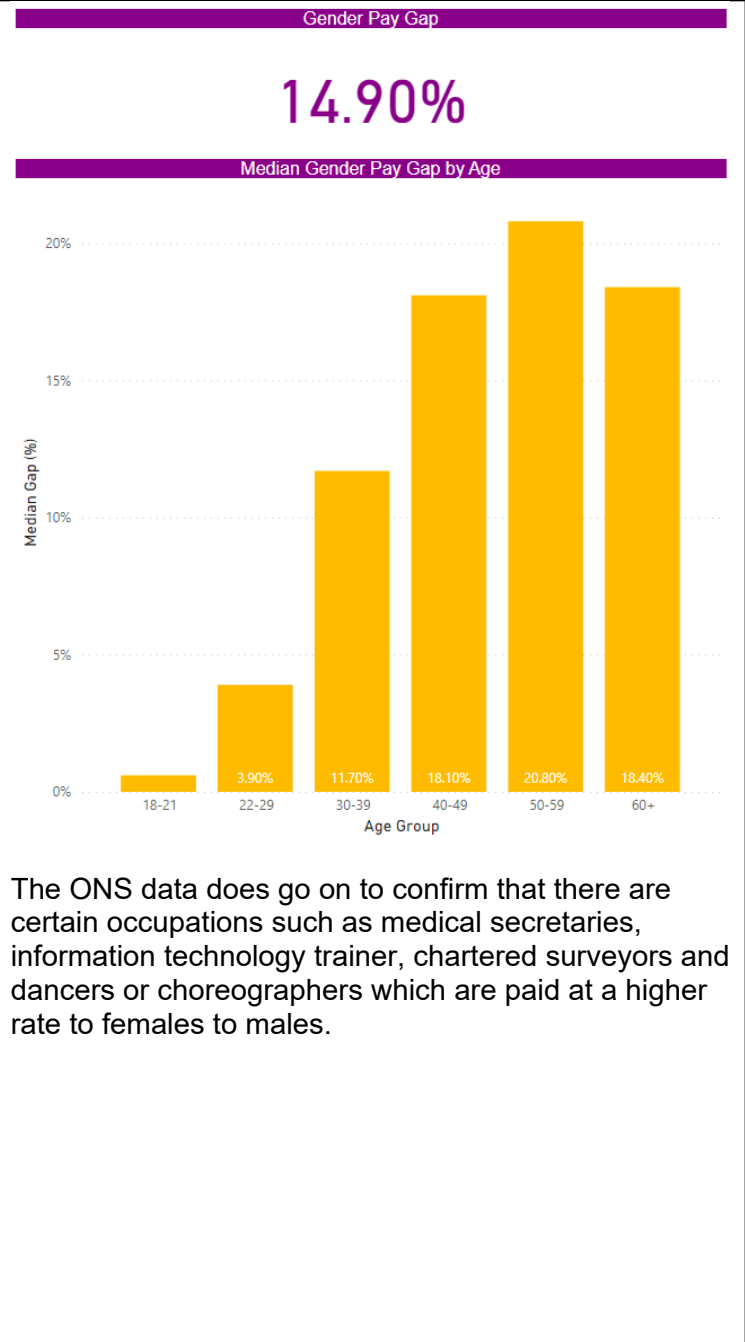
The requirements that recruitment panels are diverse is applicable to this and other characteristics, the impact of which will be monitored by the EDI Board.

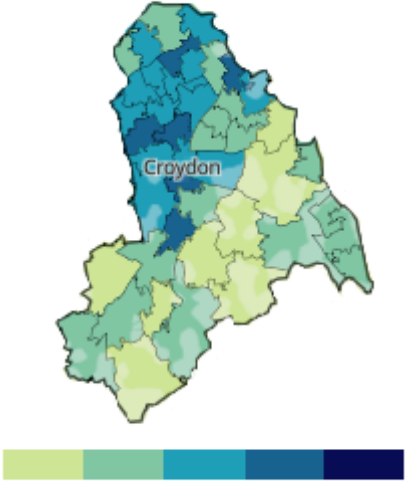
The Council plans to develop a three-year partnership plan to tackle violence against women and girls.

The 2021 and 2022 gender pay gap figures were calculated as 0% for the as both mean and median figures.



This first metric and chart shows that males are earning 14.9% more income for the same employment as women. When looked at by age it is clear to see that females under 30 are paid closer to 4% less than males and females over 40 are paid close to 20% less than males. Based on this is it could be said that employed males over 40 are likely to be earning more than females.

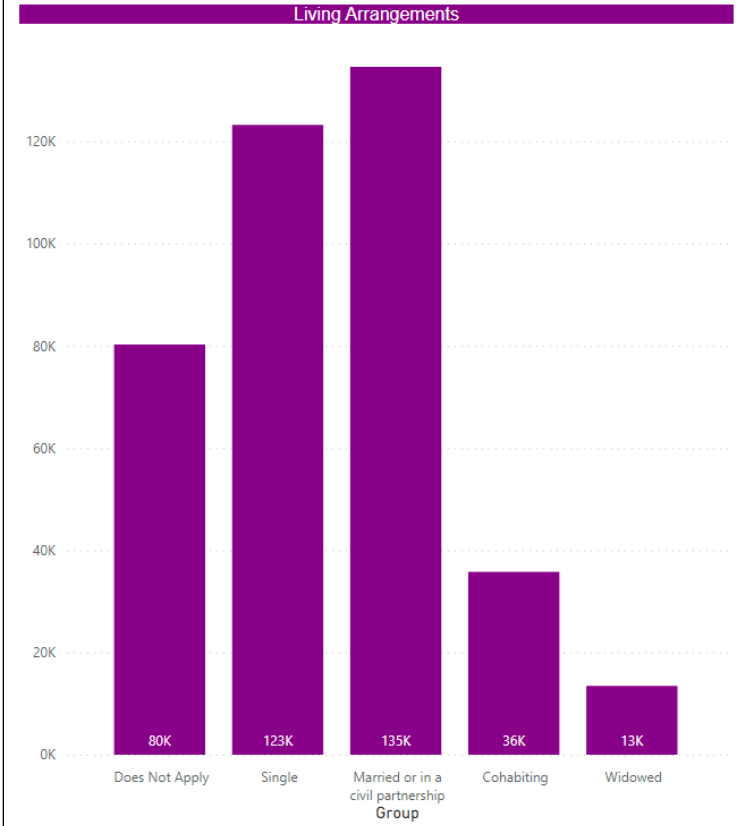


<p>Gender Reassignment</p>	<p>Disclosure rates for this minoritized group have increased.</p> <p>The LGBT+ group are represented at the EDI Internal Control Board.</p> <p>An LGBT+ Needs Assessment group has been formed by Public Health and works with statutory and voluntary partners in the borough to improve the lived experience of LGBT+ community in the organisation and the borough.</p> <p>Having diverse recruitment panels will also have an impact on this protected characteristic and is included in the refreshed Equality Strategy.</p> <p>LGBT+ community have been engaged in the Borough of Culture.</p>		<p>Workforce data:</p> <p>Non-disclosure- prefer not to say 0.97 % Not specified – 39.8%</p> <p>From that data 0.89% of Croydon residents identify as a gender different from sex registered at birth.</p> <p>With higher populations in Central Croydon and North Croydon, area to note are Broad Green & Waddon (1.86%), Purely North (1.56%), Selhurst South & West Croydon (1.49%) and Thornton Heath North West (1.48%).</p> <p>This can be seen from the map shown below.</p> <p>Gender Identity Different from Birth</p>  <p>0.02% 0.43% 0.82% 1.39% 2.73% 8.12%</p>
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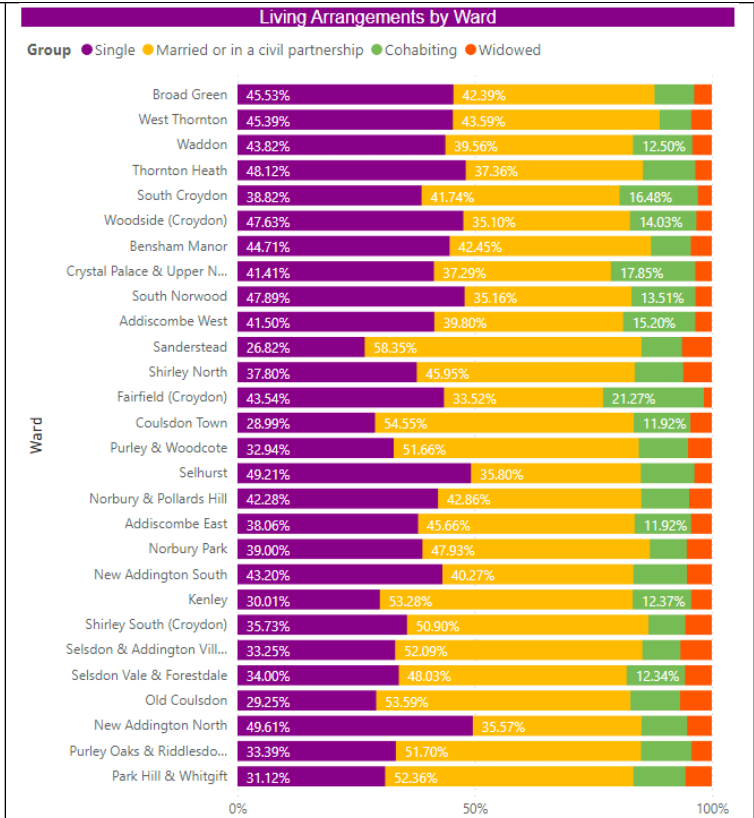
Marriage or Civil Partnership

There is no impact on this characteristic.

From the below it can be seen that the majority of Croydon residents are married, in civil partnerships or co-habiting.

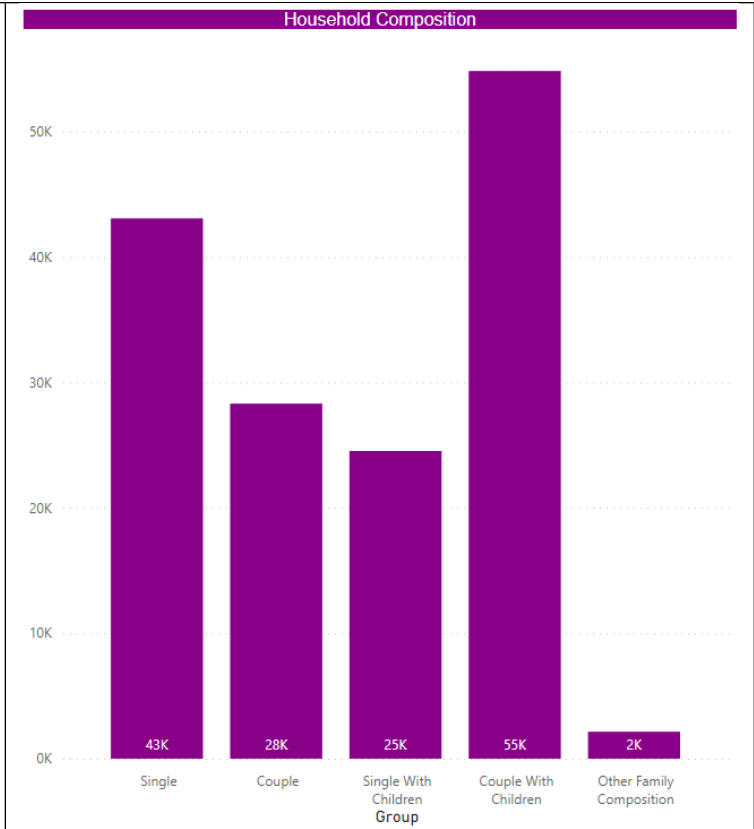


Broken into wards and excluding those that answered the census “do not apply”, it can be seen that there are high rates of single living arrangements in Fairfield, Thornton Heath, Selhurst and New Addington



Data from Council Tax EQIA

A “male-female” household would have equal income opportunity to other “male-female” households. “Male-male” households would have higher income opportunity than “male-female” and “female-female” households.



Breaking this down to borough wards the areas of high singles without children, are Fairfield, Selhurst and South Norwood.

Religion or belief

Over the past year the Christian staff network has become firmly established in the organisation and has joined the EDI Internal Control Board and has a voice at monthly meetings.

The group has arranged a number of events such as the Christmas carol service which have been well attended.

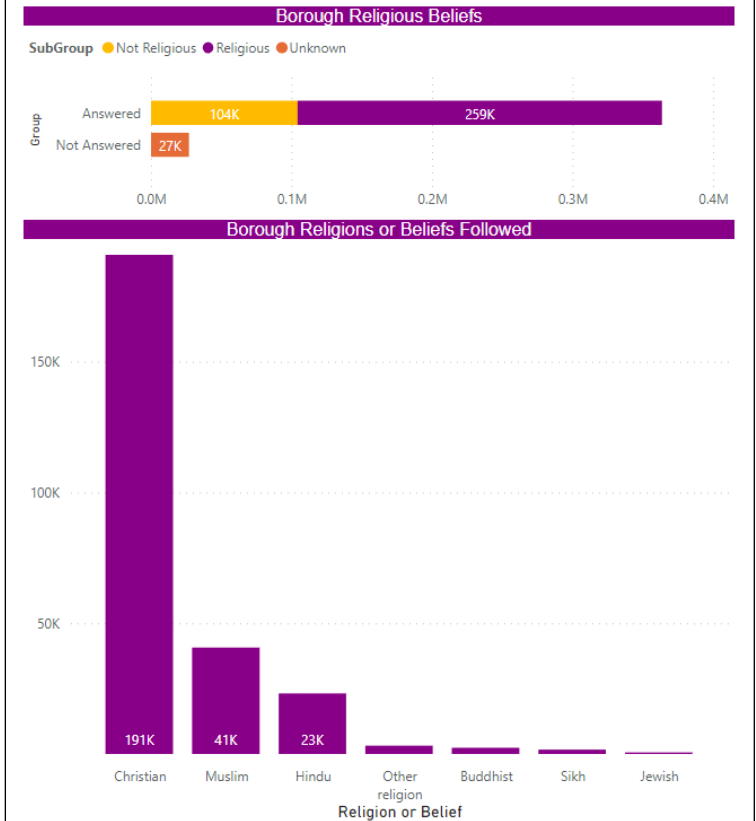
Members of other faith groups will be encouraged to establish their own Networks if they feel the need for them.

We will use the International Holocaust Remembrance Alliance (IHRA), definition of anti-Semitism and All-Party Parliamentary Group on British Muslims definition of Islamophobia as adopted by full Council. Some of these minoritized groups have also been racialized.

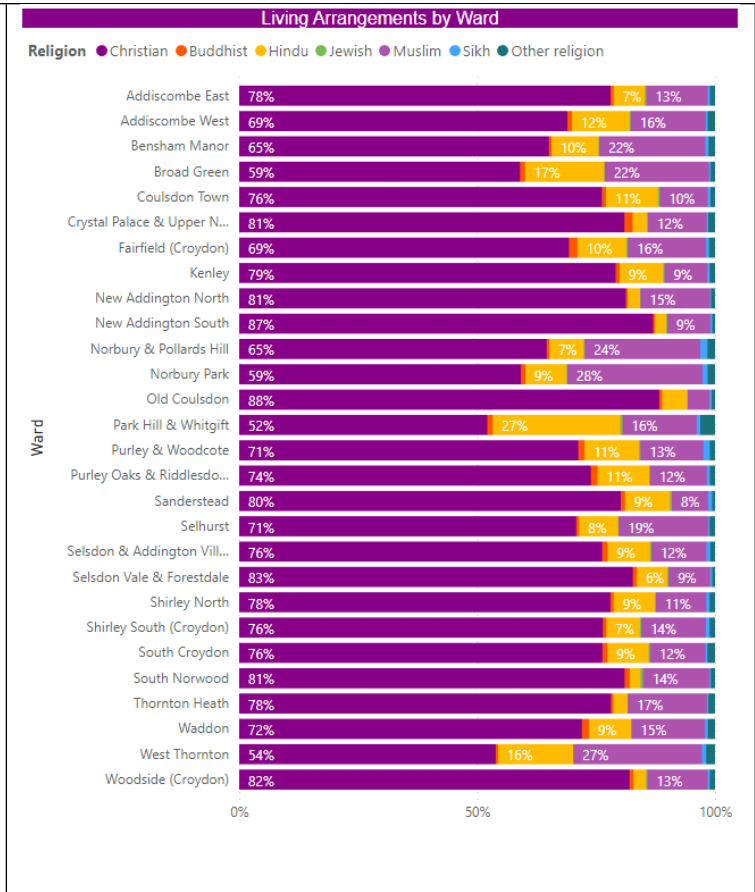
Faith groups have been engaged in the Borough of Culture events.

Non-disclosure- prefer not to say 7.83%
Not specified – 39.8%

29% of Croydon residents have declared they are not religious. Compared with 71% (259k) of residents stating they do hold a religious belief. The chart below shows that breakdown and what religion or belief those that answered follow.



Breaking this down to specific religions followed in each ward, as the chart above would indicate there is a strong Christian presence in every ward with significant Muslim and Hindu populations in most.

			 <p>Living Arrangements by Ward</p> <p>Religion: Christian (Purple), Buddhist (Orange), Hindu (Yellow), Jewish (Green), Muslim (Light Purple), Sikh (Blue), Other religion (Dark Green)</p> <table border="1"> <thead> <tr> <th>Ward</th> <th>Christian</th> <th>Buddhist</th> <th>Hindu</th> <th>Jewish</th> <th>Muslim</th> <th>Sikh</th> <th>Other religion</th> </tr> </thead> <tbody> <tr><td>Addiscombe East</td><td>78%</td><td></td><td>7%</td><td></td><td>13%</td><td></td><td></td></tr> <tr><td>Addiscombe West</td><td>69%</td><td></td><td>12%</td><td></td><td>16%</td><td></td><td></td></tr> <tr><td>Bensham Manor</td><td>65%</td><td></td><td>10%</td><td></td><td>22%</td><td></td><td></td></tr> <tr><td>Broad Green</td><td>59%</td><td></td><td>17%</td><td></td><td>22%</td><td></td><td></td></tr> <tr><td>Coulsdon Town</td><td>76%</td><td></td><td>11%</td><td></td><td>10%</td><td></td><td></td></tr> <tr><td>Crystal Palace & Upper N...</td><td>81%</td><td></td><td></td><td></td><td>12%</td><td></td><td></td></tr> <tr><td>Fairfield (Croydon)</td><td>69%</td><td></td><td>10%</td><td></td><td>16%</td><td></td><td></td></tr> <tr><td>Kenley</td><td>79%</td><td></td><td>9%</td><td></td><td>9%</td><td></td><td></td></tr> <tr><td>New Addington North</td><td>81%</td><td></td><td></td><td></td><td>15%</td><td></td><td></td></tr> <tr><td>New Addington South</td><td>87%</td><td></td><td></td><td></td><td>9%</td><td></td><td></td></tr> <tr><td>Norbury & Pollards Hill</td><td>65%</td><td></td><td>7%</td><td></td><td>24%</td><td></td><td></td></tr> <tr><td>Norbury Park</td><td>59%</td><td></td><td>9%</td><td></td><td>28%</td><td></td><td></td></tr> <tr><td>Old Coulsdon</td><td>88%</td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Park Hill & Whitgift</td><td>52%</td><td></td><td>27%</td><td></td><td>16%</td><td></td><td></td></tr> <tr><td>Purley & Woodcote</td><td>71%</td><td></td><td>11%</td><td></td><td>13%</td><td></td><td></td></tr> <tr><td>Purley Oaks & Riddlesdo...</td><td>74%</td><td></td><td>11%</td><td></td><td>12%</td><td></td><td></td></tr> <tr><td>Sanderstead</td><td>80%</td><td></td><td>9%</td><td></td><td>8%</td><td></td><td></td></tr> <tr><td>Selhurst</td><td>71%</td><td></td><td>8%</td><td></td><td>19%</td><td></td><td></td></tr> <tr><td>Selsdon & Addington Vill...</td><td>76%</td><td></td><td>9%</td><td></td><td>12%</td><td></td><td></td></tr> <tr><td>Selsdon Vale & Forestdale</td><td>83%</td><td></td><td>6%</td><td></td><td>9%</td><td></td><td></td></tr> <tr><td>Shirley North</td><td>78%</td><td></td><td>9%</td><td></td><td>11%</td><td></td><td></td></tr> <tr><td>Shirley South (Croydon)</td><td>76%</td><td></td><td>7%</td><td></td><td>14%</td><td></td><td></td></tr> <tr><td>South Croydon</td><td>76%</td><td></td><td>9%</td><td></td><td>12%</td><td></td><td></td></tr> <tr><td>South Norwood</td><td>81%</td><td></td><td></td><td></td><td>14%</td><td></td><td></td></tr> <tr><td>Thornton Heath</td><td>78%</td><td></td><td></td><td></td><td>17%</td><td></td><td></td></tr> <tr><td>Waddon</td><td>72%</td><td></td><td>9%</td><td></td><td>15%</td><td></td><td></td></tr> <tr><td>West Thornton</td><td>54%</td><td></td><td>16%</td><td></td><td>27%</td><td></td><td></td></tr> <tr><td>Woodside (Croydon)</td><td>82%</td><td></td><td></td><td></td><td>13%</td><td></td><td></td></tr> </tbody> </table>	Ward	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion	Addiscombe East	78%		7%		13%			Addiscombe West	69%		12%		16%			Bensham Manor	65%		10%		22%			Broad Green	59%		17%		22%			Coulsdon Town	76%		11%		10%			Crystal Palace & Upper N...	81%				12%			Fairfield (Croydon)	69%		10%		16%			Kenley	79%		9%		9%			New Addington North	81%				15%			New Addington South	87%				9%			Norbury & Pollards Hill	65%		7%		24%			Norbury Park	59%		9%		28%			Old Coulsdon	88%							Park Hill & Whitgift	52%		27%		16%			Purley & Woodcote	71%		11%		13%			Purley Oaks & Riddlesdo...	74%		11%		12%			Sanderstead	80%		9%		8%			Selhurst	71%		8%		19%			Selsdon & Addington Vill...	76%		9%		12%			Selsdon Vale & Forestdale	83%		6%		9%			Shirley North	78%		9%		11%			Shirley South (Croydon)	76%		7%		14%			South Croydon	76%		9%		12%			South Norwood	81%				14%			Thornton Heath	78%				17%			Waddon	72%		9%		15%			West Thornton	54%		16%		27%			Woodside (Croydon)	82%				13%		
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Park Hill & Whitgift	52%		27%		16%																																																																																																																																																																																																																																						
Purley & Woodcote	71%		11%		13%																																																																																																																																																																																																																																						
Purley Oaks & Riddlesdo...	74%		11%		12%																																																																																																																																																																																																																																						
Sanderstead	80%		9%		8%																																																																																																																																																																																																																																						
Selhurst	71%		8%		19%																																																																																																																																																																																																																																						
Selsdon & Addington Vill...	76%		9%		12%																																																																																																																																																																																																																																						
Selsdon Vale & Forestdale	83%		6%		9%																																																																																																																																																																																																																																						
Shirley North	78%		9%		11%																																																																																																																																																																																																																																						
Shirley South (Croydon)	76%		7%		14%																																																																																																																																																																																																																																						
South Croydon	76%		9%		12%																																																																																																																																																																																																																																						
South Norwood	81%				14%																																																																																																																																																																																																																																						
Thornton Heath	78%				17%																																																																																																																																																																																																																																						
Waddon	72%		9%		15%																																																																																																																																																																																																																																						
West Thornton	54%		16%		27%																																																																																																																																																																																																																																						
Woodside (Croydon)	82%				13%																																																																																																																																																																																																																																						
<p>Race</p>	<p>In February 2023, the Council agreed to be a pilot organisation in the Chief Executive of London Council's (CELC) Tackling Racial Injustice (TRI) programme.</p> <p>As part of the Programme each council is requested to adopt the London Council's anti racist statement. The programme of work includes seven workstreams, one of which is community engagement. Adoption of this as part of the</p>		<p>December 2022 - GLA YouGov Cost of living poll results.pdf (airdrive-secure.s3-eu-west-1.amazonaws.com)</p> <p>The mean ethnicity pay gap figure has risen by 0.7% from 2021 -22. 2021 (9.6% mean; 6.8% median)</p> <p>Non-disclosure- prefer not to say 1.45% Not specified – 19.71</p> <p>The latest data from the ONS reveals that the group with the highest number of residents is White, which</p>																																																																																																																																																																																																																																								

Strategy will build on the Council’s already clear commitment to anti-racism.

The refreshed Equality Strategy and the recently agreed People and Culture strategy, which is incorporated into the Equality Strategy, will establish Positive Action training for underrepresented groups. The People Strategy will also support the aims of the council to work towards becoming an anti-racist organisation by providing training and support to staff.

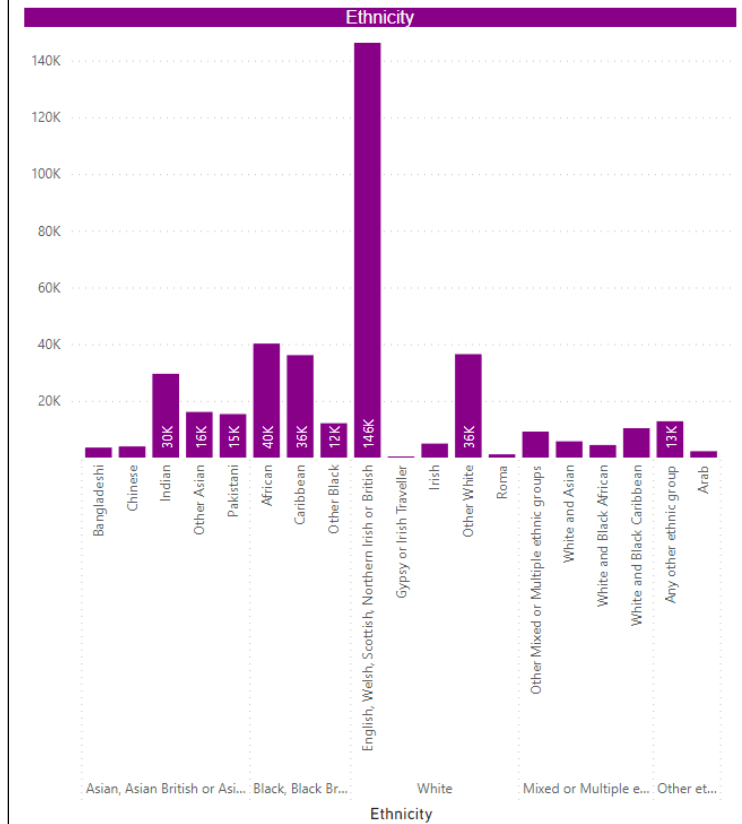
We no longer use the term BAME to describe ethnic groups. We use the terms Global Majority, racialised groups and minorized groups.

THE Global Majority and other racialized groups have been fully included in the Borough of Culture celebrations.

As set out in the Annual Report, CMT have committed to improve the lived experience of the Global Majority and other racialized groups as part of The Big Promise as part of Race Equality Week 2023.

We have committed to a mentoring programme for Global Majority employees to reduce under-representation of staff at grade 15 and above.

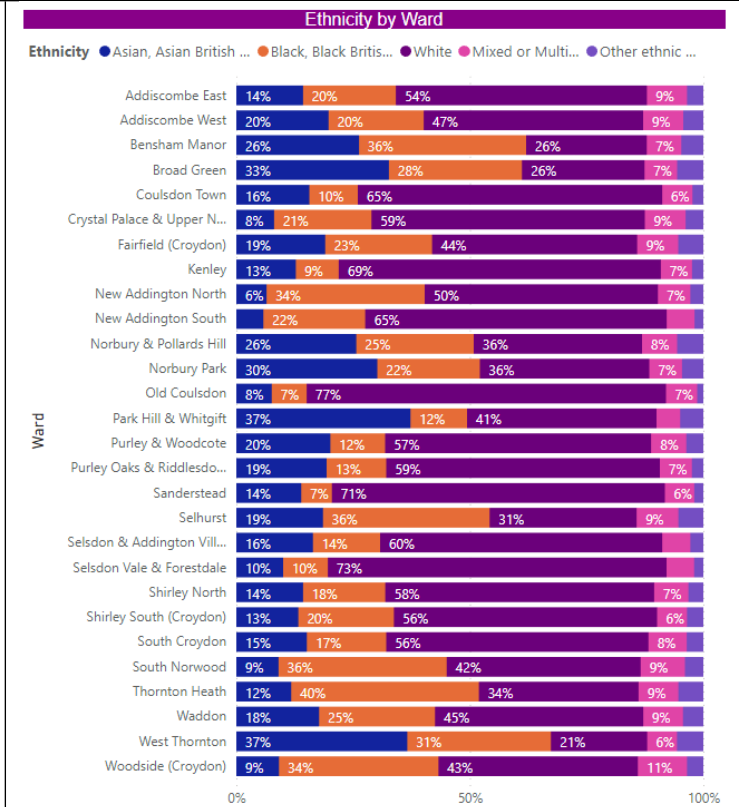
contains a few different groups as detailed in the chart below.



To determine if this is a representative picture of all areas of Croydon this data has also been reviewed at a ward level as well. This is shown in the chart below.

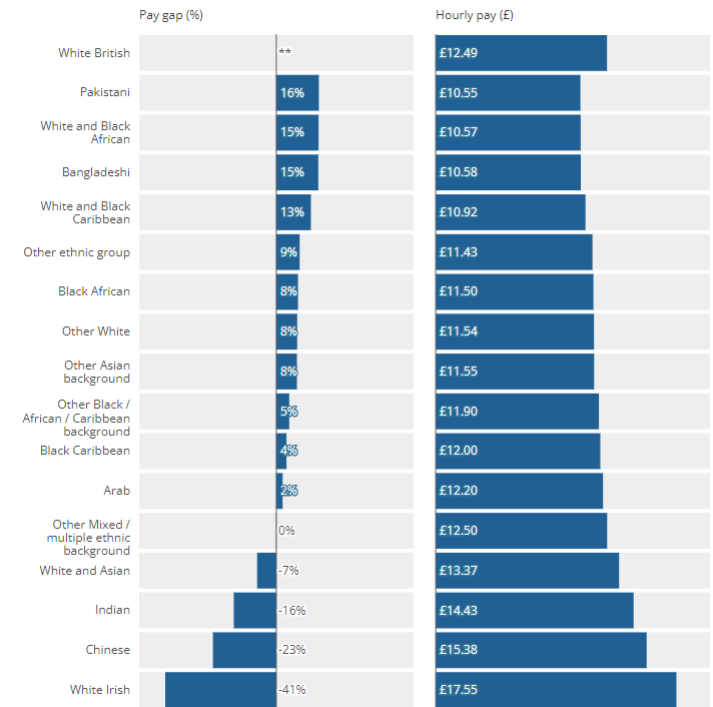
We will review our corporate approach to community engagement to ensure that it is effective in reaching all communities including minoritized groups, and promotes a culture of sustained and equitable engagement and participation within all areas of the organization.

The Global Majority have been included in the Borough of Culture events.



The below shows the ONS 2019 annual population survey which highlights that many ethnicities, when compared to the White British population are earning less at the same job. There are some ethnicities where earnings are higher than that of the White British counterpart.

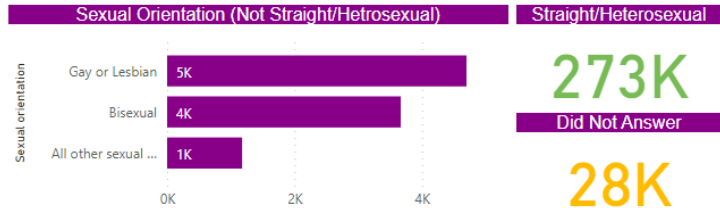
Median hourly pay and pay gap, 17 ethnic groups, England and Wales, 2019



Source: Office for National Statistics - Annual Population Survey

However, the pay quartiles show that (typically) White employees occupy a higher proportion of the upper pay quartiles compared to their representation in the workforce, and Global Majority and other racialised employees occupy a lower proportion of upper pay quartiles compared to their representation in the workforce.

There is under-representation of Global Majority and other racialized staff at grade 15 and above.

<p>Sexual Orientation</p>	<p>The LGBT+ group are represented at the EDI Internal Control Board. An LGBT+ Needs Assessment group has been formed by Public Health and works with statutory and voluntary partners in the borough to improve the lived experience of LGBT+ community in the organisation and the borough.</p> <p>LGBT+ groups have been fully included in the Borough of Culture celebrations.</p> <p>The People and Culture strategy will establish Positive Action training for minoritized groups.</p>		<p>Non-disclosure- prefer not to say 9.05% Not specified – 22.67%</p> <p>There are individual companies and organisation that have made assessments of their businesses and published their findings.</p> <p>For example, nationally PwC noted a 20.4% gap in their annual report. Annual Report 2022 - Inclusion and diversity - PwC UK</p> <p>There are other reports that have been published globally and in the UK that support this picture that gay, lesbian and bi-sexual workers are earning less than their straight counterparts.</p> <p>The ONS Census from 2021 is the available data for Croydon on sexual orientation.</p> <p>From this data a summary of Croydon is as follows:</p>  <table border="1"> <thead> <tr> <th>Sexual Orientation</th> <th>Count</th> </tr> </thead> <tbody> <tr> <td>Gay or Lesbian</td> <td>5K</td> </tr> <tr> <td>Bisexual</td> <td>4K</td> </tr> <tr> <td>All other sexual ...</td> <td>1K</td> </tr> <tr> <td>Straight/Heterosexual</td> <td>273K</td> </tr> <tr> <td>Did Not Answer</td> <td>28K</td> </tr> </tbody> </table>	Sexual Orientation	Count	Gay or Lesbian	5K	Bisexual	4K	All other sexual ...	1K	Straight/Heterosexual	273K	Did Not Answer	28K
Sexual Orientation	Count														
Gay or Lesbian	5K														
Bisexual	4K														
All other sexual ...	1K														
Straight/Heterosexual	273K														
Did Not Answer	28K														
<p>Pregnancy or Maternity</p>	<p>The council continues to review its policies to ensure that they are supportive and include adjustments for pregnancy and maternity.</p>		<p>The council does not have a way of identifying, or sizing, the number of residents that are pregnant or on maternity.</p>												

Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

3.2 Additional information needed to determine impact of proposed change

Table 2 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	Information source	Date for completion

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Equality Analysis

Table 3 – Impact scores

Column 1 PROTECTED GROUP	Column 2 LIKELIHOOD OF IMPACT SCORE Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Column 3 SEVERITY OF IMPACT SCORE Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Column 4 EQUALITY IMPACT SCORE Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group. Equality impact score = likelihood of impact score x severity of impact score.
Age	3	1	3
Disability	3	1	3
Gender	3	1	3
Gender reassignment	3	1	3
Marriage / Civil Partnership	3	1	3
Race	3	1	3
Religion or belief	3	1	3
Sexual Orientation	3	1	3
Pregnancy or Maternity	2	1	2

Equality Analysis

4. Statutory duties

4.1 Public Sector Duties

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

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Important note: Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

Table 4 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability				
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				
Age				
Religion or belief				
Pregnancy or maternity				
Marriage/civil partnership				

Equality Analysis

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter **X** in column 3 (**Conclusion**) alongside the relevant statement to show your conclusion.

Decision	Definition	Conclusion - Mark 'X' below
No major change	<p>Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</p> <p>The Equality Strategy 2023-2027 has a positive impact on all protected characteristics and supports the Council in meeting the requirements of the Public sector Equality Duty, going beyond this duty towards best practice and cultural transformation.</p>	X
Adjust the proposed change	<p>We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</p>	
Continue the proposed change	<p>We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.</p>	
Stop or amend the proposed change	<p>Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.</p>	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Date:

Equality Analysis

7. Sign-Off

Officers that must approve this decision		
Equalities Lead	Name: Denise McCausland Position: Equality Programme Manager	Date: 16 August 2023
Director	Name: David Courcoux Position: Director - Policy, Programmes and Performance	Date: 17/08/23

LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	27 September 2023	
REPORT TITLE:	Progress update on the People and Cultural Transformation Strategy 2022-2026 and Action Plan	
CORPORATE DIRECTOR / DIRECTOR:	Elaine Jackson, Assistant Chief Executive and Dean Shoesmith, Chief People Officer, Human Resources and Organisational Development	
LEAD OFFICER:	Dean Shoesmith, Chief People Officer Email: Dean.Shoesmith@croydon.gov.uk	
LEAD MEMBER:	CLLR JASON CUMMINGS, CABINET MEMBER FOR FINANCE	
KEY DECISION?	No	N/A
CONTAINS EXEMPT INFORMATION?		Public
WARDS AFFECTED:	All	

1 SUMMARY OF REPORT

- 1.1 This report provides an update on the development and progress of the People and Cultural Transformation Strategy 2022-2026 and supporting Action Plan, as requested by Cabinet in January 2023. The report gives an overview of the seven pillars within the strategy, outlining the interdependencies across each pillar and how the strategy design enables activities in each pillar to deliver key transformational change as required by the Croydon Renewal and Improvement Plan and the Executive Mayor’s Business Plan.
- 1.2 It outlines activities already achieved, activities underway, alongside plans to continue to change the culture of the organisation to become a council that delivers good quality services in an open and responsive way to residents, underpinned by strong financial disciplines and effective governance. The approach embedded in the People and Cultural Transformation Strategy is predicated on high staff engagement, co-creation, behavioural change and an aligned performance management framework. Key activities in the action plan have been co-created with staff.

2 RECOMMENDATIONS

For the reasons set out in the report and appendix the Executive Mayor in Cabinet is recommended:

- 2.1 to receive an update on the People and Culture Transformation Strategy 2022-2026 development and action plan; and,
- 2.2 to note the achievements to date, work in progress, planned actions, and the contents of the report and Action Plan

3 REASONS FOR RECOMMENDATIONS

- 3.2 The Executive Mayor in Cabinet has requested an update report on the progress of the People and Cultural Transformation Strategy 2022-26 and supporting Action Plan.

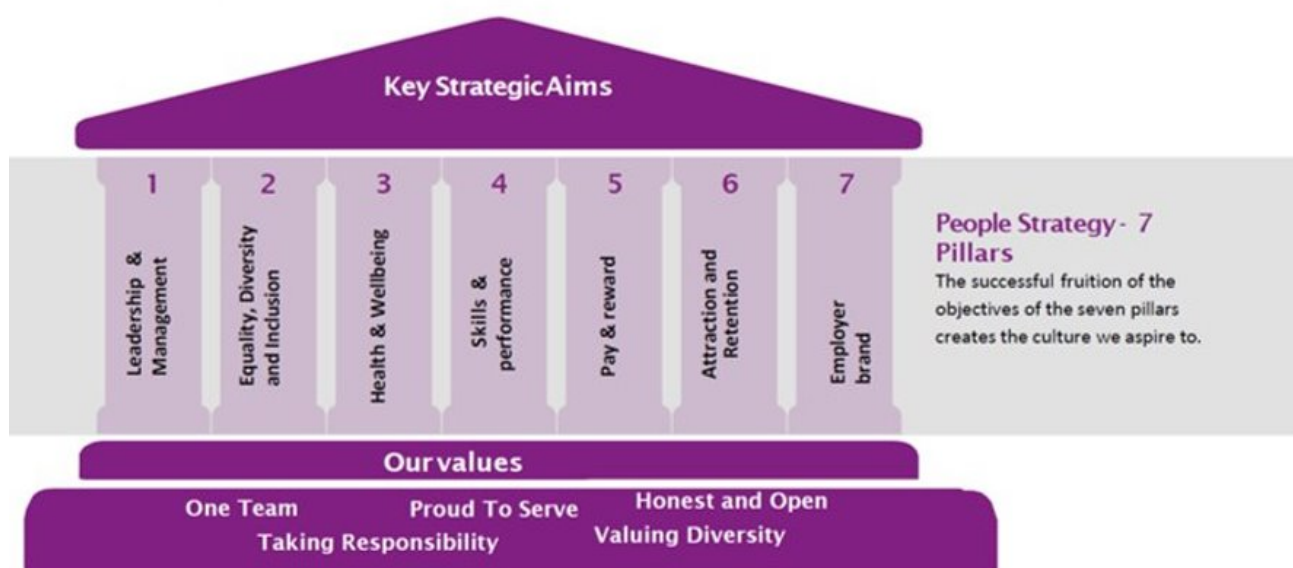
4 BACKGROUND AND DETAILS

- 4.2 The People and Cultural Transformation Strategy 2022-2026 (Appendix 1) was developed in 2022 and agreed by the Executive Mayor in Cabinet on 25th January 2023. Pre-decision scrutiny took place via the Scrutiny and Overview Committee on 23rd January 2023 and the Chair of Scrutiny and Overview Committee requested a future update on the strategy delivery. The purpose of the strategy and its associated action plan is to provide a framework in which the council addresses its workforce priorities over the next four years, setting out the way in which we will recruit, manage and invest in staff to achieve the transformation required by the Croydon Renewal Plan and in line with the Executive Mayor's Business Plan priorities, to ensure that as an organisation the Council is able to deliver good quality services in a financially sustainable way.
- 4.3 The strategy contains seven pillars which interconnect and seek to strengthen leadership and management capabilities, get governance right, improve skills and performance, enhance our health and wellbeing opportunities as well as ensuring that our brand enables us to attract and retain excellent people who are representative of the communities that we serve.
- 4.4 Whilst the overall owner of the strategy is the Chief People Officer, the delivery of the strategy is owned by the whole workforce. As a people-to-people business, this is to ensure we remain aligned to the wider organisation transformation journey, as well as ensuring our employees can play an active role in our cultural transformation, and our programme is inclusive ensuring that our residents and customers remain at the heart of what we do.
- 4.5 The Council has co-created its action plan (Appendix 2) with staff and key partners across the organisation, through active engagement and consultation to ensure that the employee voice is clearly defined. We are actively engaging with staff on activities that are underway and across the wider council to ensure that the People and Cultural Transformation Strategy is embedded.

- 4.6 Over the course of 12 sessions, more than 200 staff engaged in sharing their knowledge, experiences, and priorities to enable the council on its journey. The staff represented a cross-section of our workforce community and were representative in departments, grades, careers, and several protected characteristics.
- 4.7 A further eight focus groups with 30 attendees, and 15 Head of Service / Director 1:1s were undertaken in May 2023 to specifically shape leadership, management, and performance requirements, all with an EDI lens. Four focus groups were held to support the refresh of the Equalities Strategy, with 43 colleagues attending and further sessions to engage colleagues around core health and wellbeing actions took place in the summer, though at the time of writing the attendance and outputs were unknown.
- 4.8 The progress of the Strategy is overseen by the Workforce Internal Control Board to ensure that we continue to meet the targets outlined and regular reports are provided on our implementation.

Our People and Cultural Transformation Strategy

Strategic objectives 2022- 2026



Seven key strategic objectives have been developed to provide a framework that addresses the council's workforce needs, enabling through organisational development the council to improve services to residents and setting in place a clear, measurable action plan for the next four years.

- 4.9 Each of our seven pillars has its own action plan, with defined milestones over the course of each of the four years of the delivery plan. However, it is important to ensure that the strategy remains adaptive, complementing the organisation position and journey and, therefore, these milestones will have some flexibility to ensure that they enable the effective delivery of the overall strategy.
- 4.10 **Pillar One** focuses on strengthening our leadership and management capabilities.
- 4.11 **Pillar Two** focuses on building an equality driven, inclusive and diverse workforce. This pillar intertwines with each of the other pillars to provide the foundations of our inclusive culture changes.
- 4.12 **Pillar Three** focuses on prioritising the health, wellbeing and resilience of our staff, where staff can thrive, are engaged and motivated to deliver positive outcomes for our diverse communities.
- 4.13 **Pillar Four** focuses on building our skills and capabilities and optimising our performance to deliver positive outcomes for Croydon's communities.
- 4.14 **Pillar Five** focuses on establishing a market leading pay and reward package.
- 4.15 **Pillar Six** focuses on attracting and retaining talent, responding to skills gaps in the context of a more competitive recruitment market.
- 4.16 **Pillar Seven** focuses on developing an employer brand to attract employees who share the Council's values. There are interdependencies across all the pillars of the

strategy, and it is in the Employer Brand that we see the culmination of wider actions that together make Croydon an attractive place to work.

4.16 Our first-year achievement and priorities are set out below and our current action plan is shown at appendix 2. The action plan provides a clear overview on our approach to delivery over the next three years, including our progression from getting the basics right, to evolving and embedding our new practices and changes, as we transform how we operate and support the direction of business within the organisation.

Our Approach – Our First Year Priorities

4.17 Having co-designed our action plan with our workforce, we are at different stages of delivery in the 2023/24 year, with work already in train before the Strategy was approved by Cabinet in January 2023. Some areas have already been achieved, some are in design or delivery mode, and others will roll out over the coming months. Progress updates are shown in parenthesis in the table below at 4.18.

4.18 In summary, our first year focuses on the following areas of delivery:

Leadership and Management	<p>Through working with senior officers to create a compelling new vision, purpose and target operating model which utilises skills, systems and strategies supported by data from externally verified audits, we will lay the foundations for our culture change vision, incorporating previous programmes of work such as Crossing the Threshold.</p> <p>The following initiatives will be rolled out:</p> <ul style="list-style-type: none"> • Back to the Floor sessions – visible leadership and resolutions (in design) • Utilising the change management framework to enhance delivery of transformation and service improvement (in progress) • Adopting a leadership framework (in design) • Rolling out core programmes on inclusive and change leadership (being commissioned) • Rolling out core developmental programmes for middle managers on aspiring managers, management foundations and stepping into leadership (being commissioned) • Promoting and utilising community of practice programmes to support embedding (at research stage)
Equality, Diversity, and Inclusion	<ul style="list-style-type: none"> • We have established an EDI Board operating from February 2021 to ensure appropriate governance arrangements are in place to improve the representation of protected characteristic groups in the workforce profile to be as representative of the community we serve as possible as outlined in the refreshed our equalities strategy (achieved) • We have responded to feedback on our reasonable adjustments processes and put new processes in place to ensure more timely equipment is provided where needed. (in progress) • We continue to develop our Anti Racism Assessment approach to embed across the business (in progress) • We continue to deliver staff engagement sessions which allow a safe space for us to hear, support and respond to the voice of Launching positive action leadership programmes such as:

	<ul style="list-style-type: none"> • Launch cohort 1 'Black on Board' programme' offered by Olmec for minoritised employees, especially colleagues in entry / front line roles (coming in from October 2023) • Reciprocal Mentoring Pilot with front line and operational colleagues with CMT and wider senior leaders Allyship programme for all levels of staff. (launch sessions in progress) • We have recruited and are training over 120 people across all Directorates to ensure we have a strong pool of diverse interview panel members (achieved)
Health and Wellbeing	<ul style="list-style-type: none"> • We have developed an action plan, with priorities being identified with the workforce over the summer as part of the stop, pause and re-prioritise work. Once clear on 'what will make the biggest difference to our workforce' a range of initiatives will be rolled out (achieved) • We have undertaken a 'make time to take time' campaign to change some of our habits and behaviours around how people work, including sharing principles to allow for better meetings, work breaks and time to think (achieved) • We will be reviewing our policies to ensure that they are fit for purpose (in progress – new employee relations policies to go live in September) • All staff will undertake mandatory e-learning in mental health and wellbeing (in progress) • We have established and are rolling out a health and wellbeing passport (achieved) • We have re-invigorated The Guardians Programme (achieved)
Skills and Performance	<ul style="list-style-type: none"> • We have created a Workforce Internal Board which provides oversight and governance.(achieved) • We have refreshed our induction offering and will be rolling out a new induction experience and manager experience (stage 1 online programme achieved, stage 2 in-person induction in development) • We have launched an interim user-friendly solution for appraisals to promote quality conversations (achieved) • We will be delivering core skills and base line training for all managers on <ul style="list-style-type: none"> ○ Customer service ○ Digital skills ○ Change management ○ Managing diverse teams for managers (all in progress) • We have launched our 'A spotlight on ...' programme of mandatory training refreshers to ensure organisational compliance (achieved)
Pay and reward	<ul style="list-style-type: none"> • During our first year we will be establishing and sharing information to improve experiences in Job Evaluation, and co-creating principles in pay and reward, understanding what is important to employees, recognising that depending on your current career timeline, requirements will vary (in design) • Develop and raise awareness on total reward statements through a range of campaigns. And utilise this information better in our recruitment stages (initial design agreed by Workforce ICB – work in progress)

	<ul style="list-style-type: none"> • Reviewing options on informal and formal recognition programmes for staff (Staff Awards to go live April 2024 and Long Services awards in progress)
Attraction and retention	<ul style="list-style-type: none"> • We have been actively reviewing and streamlining our recruitment processes and practices to increase our brand, promote better opportunities for our internal staff and attract new staff to join the councils (in progress) • We have developed recruitment videos to promote our staff voices and experience (achieved) • We are looking to develop our relationships with other local services and providers and work with local colleges on talent management (in progress) • We welcome 7 new graduates to the Council in the Autumn as part of our continued participation in the National Graduate development Programme (in progress) • We are developing apprenticeship and work experience opportunities for local young people by working with Palace for Life, the charitable arm of Crystal Palace Football Club • We are developing links with Croydon University Hospital to develop a wider public sector recruitment and attraction proposition across health and social care
Employer Brand	<ul style="list-style-type: none"> • Recognising that our brand is developed based on several areas outlined above and ensuring that we actively promote the opportunities and share experiences as part of our recruitment processes (in progress, with new recruitment landing page content achieved) • That we retain are our London Living Wage status and progress to excellence in the Good Work Standard as well as begin our pursuit of other accreditations such as Investors in People accreditation if appropriate and cost effective (in progress – we are awaiting a decision on our ‘excellence’ application for the Good Work Standard)

4.19 We recognise that the pillars have interdependencies and, therefore, some timelines will be more fluid to allow for embedding and adapting to ensure that we gain the most from the changes that we implement. In addition, we also accept that if change is required to deliver the required impact, we will adapt our approach to ensure that we support the Council’s wider vision and goals.

4.20 We ask that members receive this update of the progress on the development, design and delivery of the People and Culture Transformation Strategy and we commit to providing regular updates via other forums including the Executive Mayors Advisory Board at regular intervals.

5 CONSULTATION

5.2 All employees were invited to attend workshops and presentations on the People and Cultural Transformation Strategy and provide their feedback on the content to help shape and develop the overall action plan.

- 5.3 Over 200 employees and Union colleagues attended the workshop/presentations and have contributed to, and commented on, the proposals. Additional consultation has taken place on specific elements of the strategy, including leadership, management, appraisals, careers, EDI and Health & Wellbeing. Focus groups to help with the Equalities Strategy refresh were also held, with 43 colleagues contributing.
- 5.4 The People and Culture Transformation Strategy has been presented to the ACE DMT, CMT, MAB, Scrutiny, as well as to Cabinet.
- 5.5 Whilst the action plan identifies programmes for change across the council to support and underpin how we transform our service delivery, there is no public consultation requirement.
- 5.6 It is proposed to continue to involve staff representatives throughout the continued review of the action plan implementation, as well as setting up employee groups to shape and implement specific deliverables, role modelling an inclusive culture through this co-design approach.

6 ALTERNATIVE OPTIONS CONSIDERED

- 6.1 No other options were considered.

7. CONTRIBUTION TO COUNCIL PRIORITIES

- 7.1 The People and Cultural Transformation Strategy 2022-2026 aligns to the Croydon Renewal programme and the priorities outlined in the Executive Mayor's Business Plan, particularly Priority 5: Develop our workforce to deliver in a manner that respects the diversity of our communities.

8. IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

- 8.1.1 Current finance implications are being met within existing budgets. Where additional resources will be required to support the delivery of some initiatives, now and in the future, funding bids will be made as appropriate following the Council's governance processes.
- 8.1.2 Comments approved by Lesley Shields, Head of Finance for Assistant Chief Executive and Resources on behalf of the Director of Finance. 17/8/23

8.2 LEGAL IMPLICATIONS

- 8.2.1 The basis of the core ethical standards expected of all public office holders including staff and councillors are set out within the 'Nolan Principles of Public Life' of Selflessness, Integrity, Objectivity, Accountability, Openness, Honesty and Leadership <https://www.gov.uk/government/publications/the-7-principles-of-public-life>.
- 8.2.2 Separately, everyone employed directly or who works for or on behalf of the Council including those employed directly on a permanent, temporary or casual basis and those

employed indirectly, including agency staff and consultants are bound by the Officer Code of Conduct. The Code also applies to those who are external secondees and office holders. The Code of Conduct alongside the Council's Values reflects the culture of the Council and sets out clear expectations in terms of how staff carry out their work, behave, respect and treat their colleagues and members of the public. Compliance with the Code of Conduct is mandatory, and breaches may be treated as a disciplinary offence leading to disciplinary action.

- 8.2.3 The Equality Act 2010 imposes positive duties upon the Council to promote equality and to eliminate unlawful discrimination and harassment and as such officers are also expected to uphold the legal requirements imposed within the Equality Act 2010 section 149 to (a) eliminate discrimination, harassment victimisation and any other conduct that is prohibited under the Act; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 8.2.4 In addition, the HR Handbook contains a range of other policies and procedures regulating amongst other things staff behaviour, conduct and performance management.
- 8.2.5 Separately, the Council as a best value authority "must make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness" (Section 3 Local Government Act (LGA) 1999). The best value duty applies to all functions of the Council. The Council is the subject of Directions from the Secretary of State requiring services improvement and transformation. The progress on the People and Cultural Transformation Strategy is key to the delivery of good quality and responsive services to residents and meeting the Council's best value duty.

Approved by: Director of Legal Services and Monitoring Officer. (19/09/2023)

8.3 EQUALITIES IMPLICATIONS

8.3.1 The Council has a statutory duty to comply with the provisions set out in Sec.149 of the Equality Act 2010. The Council must therefore have due regard to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.3.2 The People and Cultural Transformation Strategy is key to the council's transformation and has been developed to have a positive impact on the lived experience of all staff and the improvement of services delivered to residents. This is supported by the focus on health and wellbeing in pillar 3.

- 8.3.3** An EQIA was produced in December 2022, which was updated in August 2023 which highlights a number of key initiatives within the seven pillars of the strategy that have a positive benefit to women, the Global Majority and other minoritised groups such as LGBT+, disabled staff and younger staff. Each intervention is based on clear evidence such as workforce data including pay gap data, staffing profiles and qualitative data such as staff co creation sessions and staff feedback from whole workforce interventions such as Crossing the Threshold.
- 8.3.4** Interventions outlined in relation to equality characteristics include: positive action training for the Global Majority and other racialised groups, disabled staff and women. Other positive action interventions include reciprocal mentoring and a Black on Board leadership programme to address the under-representation of Global Majority staff at grade 15, and above.
- 8.3.5** The strategy will also improve the lived experience of disabled staff by establishing a central budget for reasonable adjustments along with management information to support socialisation of disabled staff at work including those with neurodiverse conditions.
- 8.3.6** The apprenticeship strategy and the establishment of the Croydon Young Staff Network group will support the aim to encourage a younger workforce and rebalance our work profile with regard to younger employees.
- 8.3.7** The strategy aims to ensure that all documents are gender neutral, gender along with sex will be considered in the decision-making process when the new EQIA template is launched.
- 8.3.8** A recent request for volunteers to be trained to sit on recruitment panels has resulted in over an additional 100 volunteers from all protected characteristics within the council. This will support our aim to ensure that all recruitment panels are diverse.
- 8.3.9** The strategy will also support the work within the council to become an anti-racist organisation by ensuring that the directorate supports the development of staff and organisational knowledge and makes changes to policies and processes where appropriate along with and implementing the standards of the CELC Tackling Racial Injustice programme.
- 8.3.10** The strategy will also enable the directorate to consider and explore emerging equality issues such as intersectionality to identify where staff may be more likely to be impacted by plans and changes.
- 8.3.11** The EQIA is a live document and will be updated when further data and evidence is available.
- 8.3.12** Approved by Denise McCausland Equalities Programme Manager. (Date 23/08/2023)

OTHER IMPLICATIONS

8.4 HUMAN RESOURCES IMPLICATIONS

- The People and Cultural Transformation Strategy will have a positive impact for staff in supporting and delivering a range of transformational activities which will assist in enhancing their employee journey, improving health and wellbeing opportunities, and enabling change in connection with pay and reward and learning opportunities.
- There is no direct impact on headcount.
- Approved by: Dean Shoesmith Chief People Officer. (Date 15/08/2023)

8.5 HEALTH IMPLICATIONS

- Implementing our People and Cultural Transformation Strategy has the potential to positively impact the health of our workforce (circa 60% of whom are residents of the Borough) by, for example:
 - enhancing the training and employment prospects of our workforce and local residents
 - reducing stress and anxiety whilst enabling more resilience and adaptability to change
 - strengthening control over colleague's lives and fostering empowerment

Approved by: Dean Shoesmith, Chief People Officer (Date 15/08/2023)

8.6 RISK IMPLICATIONS

- 8.6.1 A Risk register is in place for the delivery of the People and Culture Transformation Strategy with any risks or issues being raised and managed via the Workforce Internal Control Board
- 8.6.2 Risks include the delay to the design of the Target Operating Model may impact on timelines for delivery or change the delivery dates, however contingency plans around consultation and design are in place to mitigate the risk. Approved by: Dean Shoesmith, Chief People Officer (Date 15/08/2023)

8.7 DATA PROTECTION IMPLICATIONS

- 8.7.1 Whilst the overall programme has several components that will require the collection / holding of personal data of individuals this will be collected/held for specific purposes only and individuals will be aware of this through the workforce data privacy notice and the reasons for capturing the data and the processing that will be undertaken. Processing of any personal data or sensitive data will purely be for the delivery, monitoring and impact of the strategy and will only be undertaken in accordance with the Data Protection Act 2018.
- 8.7.2 A DPIA will be considered for each individual area of work where we gather personal information and we will work with our existing policy [Workforce Data Protection Policy - Final.docx \(sharepoint.com\)](#)

Approved by: Dean Shoemith, Chief People Officer (Date 15/08/2023)

9 APPENDICES

Appendix 1 People and Cultural Transformation Strategy 2022-2026

Appendix 2 People and Cultural Transformation Strategy Action Plan

10 BACKGROUND DOCUMENTS

n/a



London Borough of Croydon People and Cultural Transformation Strategy 2022 - 2026

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Overview

This four-year strategy aims to enable the delivery of the Mayor's Business Plan and the delivery of the strategic objective 'A transformed council listens to residents and delivers good services', specifically priority four to 'Develop a workforce which respects and delivers for our diverse communities'. We recognise that developing the right culture is essential to delivering the necessary change that sustains transformation and workforce improvement and is something that is raised repeatedly by our staff and members in focus groups, networks, general discussions and in the Crossing the Threshold program.

As part of the Council's wider Transformation programme there are a number of projects that are being developed to improve services and move

the Council to a financially sustainable organisation. As part of the success criteria of the overall Transformation programme the projects will include setting criteria to help towards improving the culture that in turn will help to attract and retain staff and drive up service improvement where necessary.

The Council is under a general duty of best value to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness (section 3 of the Local Government Act 1999) (as amended by Section 137 of the Local Government and Public Involvement in Health Act 2007)



Background

The council has been undertaking considerable work to make workforce improvement under the leadership of the Chief Executive since the Report in the Public Interest 2020. The culture of the council up to that point had been one where there was a lack of inclusive leadership, an organisation working in silos and where senior management was detached from the workforce, with the collective employee voice not listened to sufficiently. Issues of institutional discrimination were also considered to be barriers to equality and inclusion and rigorous efforts have been made over the last two years to address these problems and as set out below: -

- Focus groups – led by CEO/Head of OD in September/October 2020
- Croydon Renewal Plan – engagement with all staff once the plan was submitted through an extensive series of workshops
- Speak up programme working with Old Vic – Guardians’ programme offering staff support and help via a signposting service
- Tea-talks (opportunity for staff to talk directly with CMT) with all Staff Networks and new Staff Networks now set up including under 35’s, mental health and carers’ network
- All-staff webinars led by the Chief Executive with an open questions and answers format
- Crossing the Threshold, culture change programme, to reframe the employment culture to focus on delivering good services for residents and improving employee engagement and productivity. We are committed to acting on what we heard from our staff in the first phase of Crossing the Threshold workshops including senior managers being more visible to staff, with less silo working and having a ‘one team, one council approach’ which is clear feedback from staff

- How important getting this right for staff will be to make Croydon a good place to work, attract talent and retain skills
- Improved governance including internal control boards
- Assurance and delivery to move the culture to one of accountability, openness and transparency, which will improve people management with less conduct issues



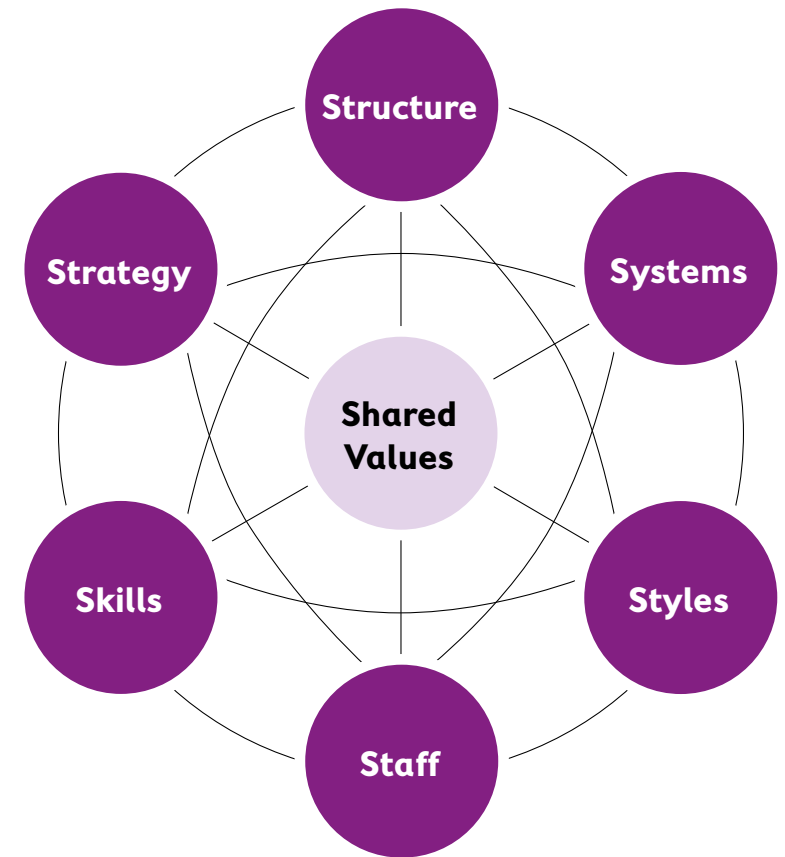
The Council has made significant changes as a result of the Corporate Restructure in 2021 (5 July 2021 Council meeting) giving focus to children’s services, adults and health, and housing. The restructure has been founded on strong people principles, with an emphasis of working as one council and how we have changed as a result of this.

Therefore, the Council has been laying foundations with design aims to ensure the Council can deliver more effectively on its business strategy, address the significant service quality improvements and workplace culture changes required by having focused and sufficient management capacity and ensuring a more consistent, corporate and effective internal control system. The organisational redesign also introduced new roles for senior and other staff to develop more cross-Council roles, role enrichment and development opportunities which this Strategy aims to build upon. Initiatives, such as the Council’s Crossing the Threshold programme, which has been initiated, and is ongoing, aims for the Council to become much more transparent, open and honest, i.e. a one-Council organisation, as set out in organisational redesign report.

Integral to talent attraction and management, the chief executive commissioned a positive action-based marketing and recruitment campaign designed to attract a diverse field of applicants as possible, and this work is to be developed and sustained in pillar 2 of this strategy.

The design has referenced the thinking behind the McKinsey “Seven S” model to guide improved ways of working, i.e., the Council must be seen as a whole system and be able to be more than the sum of its parts.

In the implementation of this People Strategy it is essential it is clearly linked and inter-dependent with the Council’s Transformation programme.



Vision statement

To enable the delivery of the Mayor's Business Plan 2022 -2026, we are committed to providing good quality services by developing our workforce to ensure they are equipped with the right skills, knowledge, and behaviours to serve our residents well. We will develop a culture of putting our residents first, embodying the council's values, which are **One Team, Proud to Serve, Taking Responsibility, Valuing Diversity and Honest and Open**, where we attract a good calibre workforce for local people to live and work. We will develop a Croydon economy making us a desired destination and employer.

Through this strategy we aim to be an employer of choice, developing a brand reputation for good service delivery, in tandem with a good employment experience, developing the skills of our people to serve our diverse residents efficiently, effectively, responsively, and courteously.

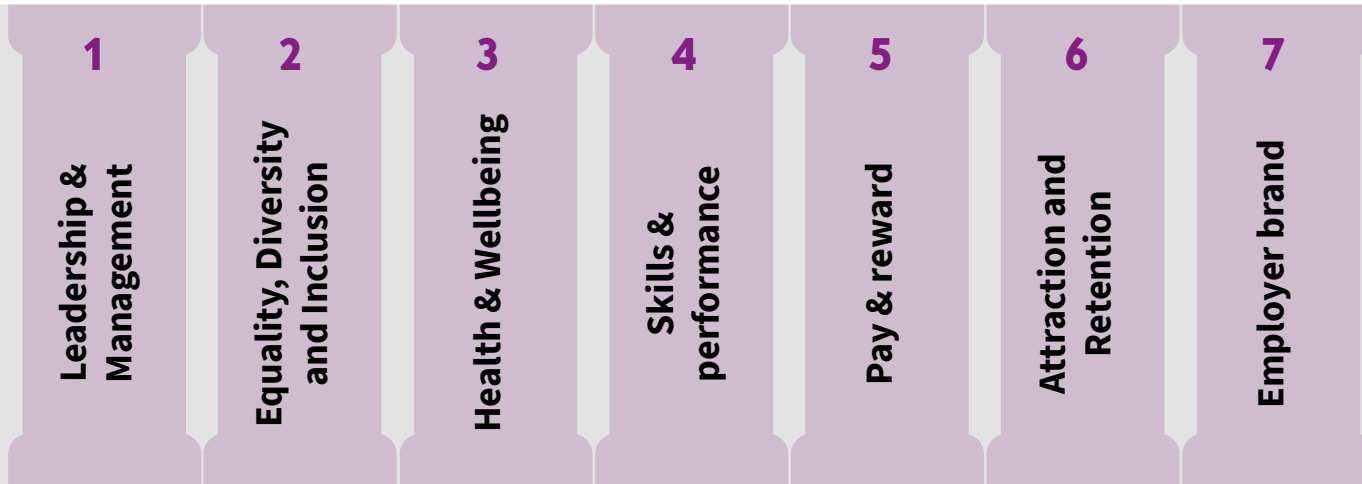
We aim to attract and retain diverse talent into the council, ensuring our workforce is as reflective as possible of the people of Croydon. This includes employing local people and ensuring our actions as an employer support local economic development and community sustainability.

We will invest in the learning and development of our workforce, equipping them with appropriate skills and solutions examples such as how to deliver good customer care, change and transformation ability, leadership and management whilst working in a digitally led environment.



Strategic objectives 2022 - 2026

Key Strategic Aims



People Strategy - 7 Pillars

The successful fruition of the objectives of the seven pillars creates the culture we aspire to.

Our Values

Taking Responsibility

One Team

Proud to Serve

Honest and Open

Valuing Diversity

Seven key strategic objectives have been developed to provide a framework that addresses the council's workforce needs, enabling through organisational development the council to improve services to residents and setting in place a clear measurable action plan for the next four years.

(Pillar 1) Strengthen our leadership and management capabilities.

Current position

Evidence from the staff survey December 2021 indicated that the council needs to develop and enhance our leadership and management capability.

Leaders are seen by staff as not sufficiently in touch with, and visible to, the workforce, needing to set clear direction listening to the collective employees' voice. This feedback is consistent with that from the first



phase of Crossing the Threshold (the council's workforce engagement and culture change programme). From staff survey feedback (see 3.2.1 above) we know managers' capabilities to engage staff with change, and deal with employment-related issues requires strengthening, along with managers' abilities to respond to workforce issues of equality, diversity, and inclusion.

Future state

Good Leadership consists of , listening, decision making, coaching, collaboration and accountability and performance.

The council aims to develop an inclusive leadership culture, with effective workforce visibility and development of approaches that truly listen to employees' voice, which has commenced through the Crossing the Threshold programme. We will revitalise our values to demonstrate through our behaviours we are embodying those values across the whole workforce, and in serving our residents, which has been a clear message from staff through Crossing the Threshold engagement sessions. There is clear interdependence with other strategic objectives in this regard, especially objectives to:

- Build an equality driven, diverse and inclusive workplace
- Prioritise the health, wellbeing and resilience of our staff
- Build our skills and capabilities and optimise our performance

The action plan at appendix 1 sets out how and when the council will realise this strategic objective, together with measurement of the critical success factors.

(Pillar 2) Build an equality driven, diverse and inclusive workplace.

Current position

Regular analysis of the council's workforce data reveals that more work is required to ensure our staff are representative of the community we serve. Several key areas for positive action emerge as themes from the analysis of our workforce data: -

- i. Age: the council's median age is 50, with 0.2% of staff under 20, and 2.6% in the age range 18-24. This reveals an ageing workforce profile, which will manifest in future years retention and skills gap issues as the current majority of the workforce is aged between 41-59 and these colleagues will pursue retirement plans over the next 5-15 years.
- ii. Ethnicity: whilst the council's overall ethnicity profile is broadly representative of the borough's demographic, at a senior level from G15 upwards there is a marked difference in the ethnicity profile with a much lower level of Black, Asian and Ethnic Minority senior managers.
- iii. Disability—whilst the council benchmarks favourably in terms of a representative disabled workforce and is in the upper quartile for London boroughs at 9.5%, this falls some way short of the borough demographic of 15%. Moreover, the lived experience of disabled staff in the workforce is another area for improvement to ensure better employee engagement.
- iv. Disclosure – the council benchmarks poorly with other London Boroughs for workforce disclosure of their protected characteristics.

The consequence of this is that without knowing the full profile of the workforce it is difficult to put in place measures that correctly align to support the equality and diversity of the workforce.

Future state

Building on work to date, a workforce EDI dashboard will be presented to the EDI internal control board to analyse the workforce profile and to highlight areas where positive action is needed to address under-representation. The EDI Board will also put in place measures to improve the employees' lived experience when coming from a protected characteristic group working for the council, completing co-creation work with the staff network groups.

The council will develop an inclusive and distributed leadership tool which aims to improve inclusion across the council, improving employees' lived experience. This initiative also enables Pillar one, strengthening the council's leadership capability.

The council aims to develop a workforce that is increasingly representative of the community we serve, as well as enabling an inclusive leadership of the workforce where employees feel they are listened to, respected, able to develop their talents, and recognised for the work they do.

Identify and embed new behaviours and ways of working aligned to Mayoral governance and a hybrid way of working.

(Pillar 3) Prioritise the health, wellbeing, and resilience of our staff, where staff can thrive and are engaged and motivated to deliver positive outcomes for our diverse communities.

Current position

Both hard and soft data indicates that stress-related conditions are increasing across the council, with stress being the most frequent reason for sickness absence. Sickness absence has seen a steady increase across the workforce throughout 2021/22 (over nine days per head per year) and work to address this is being put in place through monthly sickness panels held at Directorate Management Team level. Over the last two years the council has put extensive work into developing initiatives supporting workforce mental health and wellbeing including Mental Health champions, a workforce health and wellbeing group (led by HR and Public Health), Mental Health Tea Talks with CMT, mental health first aiders, a mental health staff network, the Guardians’ programme, as a further source of information and support, together with the council’s employee assistance programme.

A workforce health and wellbeing strategy has been developed by a cross-section of officers based on the five ways to wellbeing (connect, give, take notice, keep learning and be active) produced by the Mental Health Foundation.

Future state

Through the implementation of the workforce strategy and action plan

we aim for our workforce to be happy, healthy, and supported by the best possible working environment. We are establishing a Workforce Board, led by the CEO, which will include an increased focus on managing sickness absence to ensure we are supporting staff and providing continuity of services to residents. The aim of the workforce health and wellbeing strategy is to create a safe, healthy and ‘good work’ environment which fosters a culture of positive wellbeing for all its employees.

We aspire to fulfil the Chartered Institute of Personnel and Development’s best practice regarding workforce wellbeing, which is ‘to gain real benefit wellbeing must be integrated throughout the organisation, embedded in its culture, its leadership and its people management (CIPD 2019)’.



Implement initiatives to address workplace conflict, including a relaunched employee mediation scheme, seeking to resolve any conflict as close to the point of origin as possible and taking best practice from ACAS (Arbitration and Conciliation Advisory Service).

NB: Industry leads in effective employment relations

(Pillar 4) Build our skills and capabilities and optimise our performance.

Current position

The December 2021 staff survey highlights a number of workforce development areas, including the ability for staff to develop themselves and their careers. The survey data is also supported by feedback from the staff network groups and in particular the Race Equality Network where Black, Asian and minoritised staff report that they are overlooked for professional development and career progression. As Black, Asian, and minoritised staff make up 37% (January 2023) of the workforce (note,



where staff have shared their protected characteristic data) this represents a sizeable proportion of the workforce where there is a need to build skills and capabilities to serve our residents.

Future state

The council will invest in positive action development programmes for protected characteristic staff to ensure an equitable approach to address current and past organisational shortcomings.

We will develop clear career and skills development pathways to ensure a systemic and holistic approach to workforce development which will be aligned to business planning and the fulfilment of the Mayor's Business Plan to optimise performance for residents' benefit.

We aim to be known as an employer that invests in our workforce improving employees' wellbeing, capability, performance, and the council's reputation as an employer. We will redevelop our recruitment landing pages to provide an authentic brand image of the council as a good place to work with footage of diverse staff speaking about their experiences, including continuing professional development, to attract diverse and capable talent.

Develop and roll out a refreshed people performance management and appraisal system aiming to provide the best quality services possible to residents.

(Pillar 5) Acquire and retain talent, responding to skills gaps in the context of a more competitive recruitment market.

Current position

The council faces significant challenges in the local, regional, and national labour markets when seeking to recruit, with spiralling pay competitiveness a common feature.

The manifestation of labour market competitiveness, is the council - in skills scarce roles - needing to apply market supplements to be able to provide sufficiency of pay to attract candidates.

The current Greater London Provincial Council job evaluation scheme has been in place for over 30 years and can present difficulties in matching the labour market going rate and modern local government operating models when it comes to pay and grade determination.



The council has two different job evaluation schemes (GPLC and Hay depending on grade seniority), over 1,000 different job descriptions, and historic complexity regrading pay, grading, and determining job value.

All of the above indicates the need for a strategic pay review, including an equality pay audit. Additionally, we need to develop a simpler, transparent pay and reward system that is more flexible and adaptive to prevailing external labour market conditions, as well as being clear and easily understood across the internal workforce.

Future state

The council will conduct a strategic pay review which will seek to simplify and make transparent the approach to job value, pay and rewards. The review will aim to benchmark the council against the external labour market to ensure pay and reward is competitive, whilst also being affordable within the council's overall pay bill.

The council will align pay and grading systems and structures with skills paths and career progression to ensure a systematic approach to succession planning and talent development alongside pay and compensation, that supports effective recruitment and retention, as well as individual and organisational development.

The council will review options for simplification and modernisation of its job evaluation schemes, rationalising the mechanics of the job evaluation process and job descriptions, to unify the approach and provide improved transparency for all staff to understand how the scheme works and how job value is evaluated.

We will implement a total rewards statement to make clear Croydon's employment offer, to build our employer brand and to support effective recruitment and retention.

(Pillar 6) Establish a market lead pay and reward package.

Current position

The council, in common with other employers in the hyper-competitive London labour market, experiences challenges with employing several skills scarce occupations across the workforce. This includes qualified social workers (both children's and adults), approval mental health practitioners, digital and ICT specialists, legal, finance, planners, and building control.

The consequence of skills scarcity includes the council needing to take alternative measures to fill statutory services and other business critical roles including the recruitment of agency workers. In financial year 2021/22 the council spent £16m on agency workers and aims to reduce the cost and number involved. Agency staff are respected members of our workforce and approx. 90% of agency staff are filling established posts.

Future state

There is close alignment and interdependency with Pillars 4, 6 and 7. The council will aim to develop a more attractive employment value proposition (employment attraction package) to ensure we can recruit and retain good calibre people.

The council will build a pipeline of new talent by developing an apprenticeships strategy, developing clear career and skills pathways to address the underrepresentation of young people in the workforce, addressing skills gaps in the workforce and improving economic

development in the borough to avoid worklessness and generate economic activity. The council will commit to creating apprenticeships through clear organisational design, agreeing annual targets across all directorates to create 'new start' apprentices, as well as apprenticeship conversions which enable the council to develop current staff and draw upon the Government's levy. The council will target Croydon residents to ensure our local population benefit and the council provides community leadership to address worklessness and skills development for residents.

We will develop a range of different resourcing methods to seek to attract diverse and high-quality candidates to work for the council. As covered under Pillar 4 above, we aim to redevelop our recruitment landing pages to provide an authentic brand and compelling package to attract the best candidates possible. We will also implement a values-based approach to recruitment to ensure candidates are assessed on their behavioural values, as well as knowledge, skills, education and aptitude. We will implement and evaluate different recruiting methods such as greater use of social media, direct sourcing (use of online platforms to make direct contact with potential candidates), candidate open days, and community outreach work, including schools and colleges to attract local people to work for the council (including apprenticeships), with the wider benefit of generating economic activity and development in the community, leveraging the council's position as a major employer in the borough.

In terms of retention there are key interdependencies with Pillar 4 and building workforce skills and capabilities. We will utilise our workforce exit data to pinpoint where we have issues of employee turnover and take targeted actions, including improving employee engagement.

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In terms of retention there are key interdependencies with Pillar 4 and building workforce skills and capabilities. We will utilise our workforce exit data to pinpoint where we have issues of employee turnover and take targeted actions, including improving employee engagement.

(Pillar 7) Develop an employer brand to attract employees who share the Council's values

Current position

Given the recent past of the council and its continuing financial difficulties, attraction and successful recruitment of candidates in several skills scarce occupations can be even more challenging, added to which we are seeking to respond to the hyper-competitive London labour market. As well as developing a four-year apprenticeships strategy (see 3.6.3 above) to attract younger people to work for the council an analysis of workforce data and pay gap reports show that there is an underrepresentation of young people (only 2 % of the workforce is under 24). In senior grades there is a shortfall of Black, Asian and minoritized staff (10% v 40% for the wider workforce).

Recruitment experts have dubbed 2022 the 'great resignation' which means

staff are much more inclined to leave their employer given external pressures such as the cost-of-living crisis, 40-year high inflation rates, and the impact of the Covid-19 pandemic and successive lockdowns and associated economic turbulence. It essential to put clear recruitment plans in place and ensure we have effective talent management that attracts new skills into the council. We are also building social values embedded in the council's contracts

to leverage our supplier relationships to help us to work with the private sector for the wider prosperity and sustainability of the whole borough. For



example, we are working with Adecco and Croydon Works to ensure wider economic development and improved life chances for the young people of our borough.

Our staff are effective ambassadors of working for the council however we know from staff survey results and staff exit survey data not all hold a positive view and experience of working for the council. We need to address employee engagement, and this is interdependent with, and covered in, pillars 1 to 6 above to ensure our staff act as our employment advocates.

Future state

Develop a values-based employer brand incorporating total pay and reward and external accreditations to demonstrate real progress with our employment offer and an authentic employer brand based on external assessment. Market the attraction of Croydon as a place to live and work, including:

- Fast and efficient transport infrastructure
- Affordable housing (compared with central London), which is multi cultural and diverse
- Where there is true employee voice
- Where we have hybrid working and good office accommodation
- We aim to develop defined career paths

We have external accreditations that provide independent verification of Croydon as a good employer, including issues of overall people management as well as more specifically for equality, diversity, and inclusion.

Co Creation Session Feedback Summary

Appendix 2

Our people strategy and cultural transformation strategy implementation plan

We know we have lots of strengths, and the greatest of these is our staff. We are passionate about Croydon- the place and the people that we serve, a place where many of us have chosen to make our home. We have many committed, resilient, creative, and talented public servants at the Council, and - as the organisation changes and improves - those skills will be needed more than ever. We need a leadership team who can harness the ambitions of our staff, a team who is committed to Croydon; to delivering excellence in public services; to making Croydon a place to be proud of; and to improving the life chances of the people who live here. If we get this right, it will be transformative.

Our implementation plan is dynamic and often will be indicative in nature as it will need to be contextual, reflecting current and emerging needs internally and externally and aspirations; albeit most of the current plan is internally focused. A full cultural transformation would be remiss if it did not factor in the implications for our residents. We must evolve and transform, becoming a place and a community we feel proud to work and live in. It is reflective of our key priority actions translating what our staff have said, looking at the mayoral business plan and considering good common-sense planning whilst delivering within our means. The remainder of 23/24 will be a time for resetting and getting our basics in place and working. The subsequent years will see us honing our capabilities, developing a diverse and inclusive culture where our staff, our community partners and our residents feel a sense of pride and hope for the future. We need to get our priorities right and deliver as promised and this requires all hands-on deck, with no one left behind. We need to be co-creators of our future which is why we asked our staff to tell us what is important, we have listened. If we get most things right on this plan, we would have achieved a cultural transformation that is unprecedented for Croydon council. To guide our programme of work we will adopt the customised change framework designed for Croydon council and we will need to educate all staff and managers on its utility.

The following table represents the key priorities emanating from the people and cultural transformation strategy (PCTS) and does not include business as usual activities which must continue in tandem.

Activities are labelled by the following priority segmentation for 23/24 Legend(1)= Priority 1, (2)= priority 2, (3)= Priority 3

	23/24 Delivery	Lead	24/25 Delivery	Lead	25/26 Delivery	Measures of success
	GETTING THE BASICS RIGHT		EVOLVE/ADAPT		EMBED	
Leadership and Management	(1)Building a cultural impetus: Depict a target operating model with a compelling vision including a cultural vision, future state of Croydon, transformation road map, internal & external capabilities current and future, what we will deliver and how we will deliver services. Integrate outputs/outcomes of	CMT, Transformation office	Continue implementation /evaluation of culture development activities, processes, and integrating outputs/outcomes into mainstream business	L&OD, Transformation office	Conduct a culture audit to identify our progress against cultural vision and targets: <ul style="list-style-type: none"> Address gaps 	<ul style="list-style-type: none"> Increased staff participation in engagement exercises lead by leaders Staff say they know the organisation's direction and they know their role in the journey All organisational employee performance

Co Creation Session Feedback Summary

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	<p>Crossing the threshold initiatives to inform the culture mapping This will set the tone and platform for all transformation work</p>					<p>indicators improve incrementally year on year</p> <ul style="list-style-type: none"> ○ Yearly reduction of grievance claims and employment tribunal cases ○ Yearly positive indicators on employee relations data
	<p>Offer leadership and management development at all levels to foster a mindset of inclusive, distributed leadership and accountability with aligned behaviours, to include: (1) Establishing and embed a behavioural framework for inclusive and distributed leadership in all development offers, (2) Establish interactive exchanges for CMT, directors and heads of service (HoS) to aid the building of relationships, (3) review 360-degree approach and process for appraisals of CMT, directors and HoS by 2025,</p>		<p>Evolve leadership offers to respond to changes in landscape and movement in behavioural changes expected ie. Financial management</p> <p>Introduce 360-degree management development tool for appraisals of CMT, directors for performance management and development</p>	L&OD	<p>Introduce 360-degree management development tool for appraisals for Heads of Service</p>	<ul style="list-style-type: none"> • Reduction in staff/manager grievances • Staff say that senior managers are more visible and accessible • Develop a talent pool of future leaders ready for succession
	<p>(1) Deliver a variety of leadership conferences/forums for CMT/Directors/HOS/Middle managers to intentionally and proactively develop productive relationships among leadership to operational level</p>	OD+ external partner		L&OD	<p>Continue management and leadership network forum events/conferences to continue to develop/hone transformation capability</p>	
	<p>(1) Managers/Leaders to undertake back to the floor sessions with staff to</p>	OD + Directorate Corporate	<p>Directorates evolve & deliver local back to the floor</p>	Directorate leadership	<p>Directorates continue to increase visibility of leaders through back to the floor</p>	

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Page 379	increase visibility and understand/resolve sticking	Directors & Directors	sessions with staff to increase visibility and understand/resolve sticking points.		sessions, road shows, recognition events with staff to increase visibility and build trust is leadership
	(2)Develop a leadership offer for senior managers(CMT, Directors) on inclusive management, change leadership alongside and opportunities to participate in organisational raids, commission coaching support as required Offer leadership membership ie. White hall Industry group(WIG)	L&OD	Review leadership offer for senior leaders and ensuring individual and collective needs are being addressed. Ensure all leaders have a back to the floor plan and are executing consistently	L&OD, External partner	Evaluate impact of leadership development offers and continuously improve as required to respond to transformation initiatives
	1) Establish a programme of mentoring and (2) coaching,	L&OD, External partners	Continue to build software capability to optimise mentoring and coaching offer	L&OD, External partners	Evaluate effectiveness of senior leaders via 360, and temperature checks. Review impacts of more visibility and refresh offer
	(1)Establish networking forums for Middle managers	L&OD + MSP +external partners	Review, maintain development programmes as needed	L&OD + MSP +external partners	Ensure council wide access to mentoring and coaching opportunities as a development tool
	(3)To prepare talented managers for transition into senior roles we will offer: • Stepping into Leadership	L&OD	Continue to roll out development programmes for middle managers: • Stepping into leadership	L&OD	Evaluate effectiveness of the development programmes.
(2) Explore development programmes for all staff aspiring for future managerial positions managers:	L&OD	Implement development programmes for all staff aspiring for future managerial positions		Evaluate take up and effectiveness of the development programmes.	

Co Creation Session Feedback Summary

	<ul style="list-style-type: none"> Aspiring managers Management Foundations 		managers: <ul style="list-style-type: none"> Aspiring managers Management Foundations 			
Page 380	<p>Establish & develop the equalities, diversity and inclusion Board as a governance body for equalities</p> <p>Introduce the role of equality champions/leads & establish them for each directorate</p> <p>Establish challenge sessions with Equalities leads from all directorates to hold them to account for delivery of the equalities strategy</p>	Katherine Kerswell & Grace Addy	<p>Approval and corporate implementation of equalities strategy actions</p> <p>Ensure council wide responsibility for delivery of the equality strategy</p>	Transformation office, Equalities Board, Denise McCausland	Continue to monitor and evaluate local delivery of equality actions	<ul style="list-style-type: none"> Increased representation of global majority staff in grade 15 and above roles Our cultural outcomes are tangible and felt by 90% of staff Staff actively utilise space mechanisms Staff say they are treated fairly and can speak truth to power without repercussions Our processes, policies and system ensure fairness and equity is embedded in them
	(1)Establish a review process of our current Values looking at the value of Values, bench mark against other local authorities where it makes sense	L&OD	Refresh & resocialise our values embedding within all leadership, performance frameworks and strategies	L&OD	<p>Temperature check to evaluate our adoption of our values and reinforce any gaps using a variety of levers</p> <ul style="list-style-type: none"> Ensure values embedded into all people processes, systems including recruitment, 	<ul style="list-style-type: none"> Staff feel we provide reasonable adjustments Staff they say we are all living our values Staff networks increasingly become for a for social interaction instead of advocacy groups
	(1)To ensure fairer recruitment processes and reduce bias we will develop/train a pool of diverse of candidates for interview panels	HR & L&OD	Continue to refresh processes to keep recruitment skills current	HR, L&OD, Equalities	<p>Look to evaluate the overall impact of the diverse panels and whether there has been any quantitative or qualitative data on our shortlisting and screening processes. Do staff feel our recruitment processes are fairer as a result of using the panels. Are we using</p>	<ul style="list-style-type: none"> Council at grades 15-and above incrementally reflects the community we serve Resident satisfaction rates improve year on year

Co Creation Session Feedback Summary

	<p>Deliver staff engagement safe space mechanisms to hear, support & respond, to the voice of staff:</p> <ul style="list-style-type: none"> • Programmed monthly 'Tea Breaks' for CMT to listen • 2 Staff temperature/ pulse checks • Ongoing staff Network support • Staff road shows • Local back to floor exercises <p>(1) Establish a shadow CMT offer (3) Create values change champions within Directorates</p>	L&OD	<p>Deliver staff engagement safe space mechanisms to hear, support & respond, to the voice of staff:</p> <ul style="list-style-type: none"> • Expand 'Tea Breaks' concept • Staff Networks • Staff road shows for front line staff • Quarterly Staff Engagement survey/, temperature /pulse checks • introduce a new safe space process developed by Race Equalities Matters • Launch a shadow CMT offer • Evaluate Equalities & Values change champions within Directorates 	L&OD	<p>them consistently</p> <p>Continue to implement and evaluating effectiveness and impacts of all safe space and change agent mechanisms:</p> <ul style="list-style-type: none"> • Deliver staff engagement safe space mechanisms to hear, support & respond, to the voice of staff: • Expand 'Tea Breaks' concept • Staff Networks • Guardians programme • Staff road shows for front line staff • Deliver Quarterly Staff Engagement survey/, temperature /pulse checks • Launch a shadow CMT offer • Evaluate Equalities & Values change champions within Directorates 	
	<p>Given a 69% female workforce and a commitment to increase representation of global majority at senior levels plus a need to address some intersectionality issues, especially for the council's lower graded staff we are</p>	L&OD, External partner	<p>Deliver Positive action leadership for racialised and minoritized and women staff expand to Disability leadership mostly at frontline level</p>	<ul style="list-style-type: none"> • L&OD, External partner 	<p>Continue to offer, evaluate and expand positive action leadership programmes for global majority, women:</p> <p>Global majority:</p> <ul style="list-style-type: none"> • Launch cohort 3' Blacks on Board' 	

Co Creation Session Feedback Summary

<p>prioritising our positive action programmes on Global majority & women.</p> <p>(1)Deliver leadership programmes for racialised minorities to include:</p> <ul style="list-style-type: none"> • Launch cohort 1 'Blacks on Board' programme' offered by Olmec for minoritized employees, especially colleagues in entry / front line roles • Implement reciprocal Mentoring Pilot • 'Inspiring Individuality' leadership apprenticeship L3 offered by Raising the Bar' aims to empower and inspire individuals who may be in the minoritized groups to share the pride of their ethnicity with others and learn fundamental techniques to address inclusivity for themselves and others <p>(1)Women's programmes offered by 'Raising the Bar' to include: Women In Leadership apprenticeship programmes at L3 &5 which aims to inspire, motivate, and empower current & aspiring female leaders and stimulate talented women to meet their potential.</p>	<p>L&OD, Raise the Bar</p>	<p>:</p> <p>Global majority:</p> <ul style="list-style-type: none"> • Launch cohort 2 'Blacks on Board' programme' offered by Olmec for minoritized employees, especially colleagues in entry / front line roles • Roll out Reciprocal Mentoring for all levels of leadership & management <p>Women in Leadership Level 3 & 5 apprenticeships: Launch cohort 2 apprenticeships</p> <ul style="list-style-type: none"> • Explore an introduce Leadership offers for staff with disabilities <p>All: Participation in shadow CMT</p>		<p>programme' in partnership with Olmec for minoritized employees, especially colleagues in entry / front line roles</p> <ul style="list-style-type: none"> • Leadership programmes for those with a disability <p>Women's Leadership: Level 3 & 5 apprenticeships: Launch cohort 3 apprenticeships</p> <p>All: Participate in shadow CMT</p>	
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Co Creation Session Feedback Summary

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 383</p> <p>Health and wellbeing</p>	<ul style="list-style-type: none"> Develop a health and well strategy with action plan H&S review of Policies Establish council wide compliance for health and wellbeing training uptake Ensure council wide completion of mandatory of introductory e-learning on mental health and wellbeing course Establish a health and wellbeing passport <ul style="list-style-type: none"> (1) Guardians programme relaunched (1) Promote, refocus the Guardian's programme as a source for confidential listening and health and wellbeing support 	<p>L&OD, Public Health,</p>	<ul style="list-style-type: none"> Health and wellbeing actions are implemented and evaluated. Monitor health and wellbeing trends. Regularly review rate of usage of EAP Assess impacts of Guardian programme <ul style="list-style-type: none"> Pursue LGC award for health and wellbeing Ensure all managers complete the Champions health and well-being programme Ensure mechanisms are put in place to understand the needs of our satellite offices and areas not part of the main BWH centre 	<p>L&OD Public health</p>	<ul style="list-style-type: none"> Review Wellbeing passports Pursue London Healthy Workplace Award Monitor improvements of health and wellbeing-outcome 3 of our equality strategy 	<ul style="list-style-type: none"> Incremental reduction of short- and long-term sickness trends. Greater use of intelligent data to develop effective health and wellbeing policies & practices Reduction in sickness absence Absence rates are consistently below the reported CIPD average for Local government.
<p>Skills and Performance</p>	<ul style="list-style-type: none"> Build on our mandatory training and recertification process and ensure baseline data is in place. Ensure a robust induction to 	<p>L&OD</p>	<p>At start of financial year introduce a new performance management & appraisal system</p>	<p>L&OD</p>	<ul style="list-style-type: none"> Continue to develop skills Pathways established for all roles Review and refresh our Appraisal – 	<ul style="list-style-type: none"> All staff participate in regular, quality appraisals and feel results reflects their true performance outcomes. Skills/Career pathways

Co Creation Session Feedback Summary

Page 384	<p>the council:</p> <ul style="list-style-type: none"> • Induction – introduce basic approach then iterate over the 3 years to create induction as an experience; Manager Induction. <p>Develop and rollout training to address priority skills gaps of :</p> <ul style="list-style-type: none"> • Customer service • Digital skills • Change management • Managing diverse teams for managers • Managing conflict 		<ul style="list-style-type: none"> • Develop/pilot skills pathways for priority and/or scarce roles • Increase promotion of Utilising Apprenticeship levy to support development • Review compliance for mandatory training for all staff and managers and monitor and report through our learning management system 		<p>Review/embed approach</p> <ul style="list-style-type: none"> • A corporate hybrid, experiential onboarding and induction programme is in place and accessible to all staff 	<p>are established and working.</p> <ul style="list-style-type: none"> • All staff receive regular, quality appraisals. • 100% completion of compliance training within induction timeframe and fulfil appropriate recertifications. • Staff feel they have the skills, knowledge and tools to perform well. • Incremental decreases in disciplinary cases • Improved relationships with residents to change their perception of the Council
<p>Pay and Reward</p> <p>NB. Recognition is covered</p>	<ul style="list-style-type: none"> • Review of Job Evaluation forms to streamline • Create design principles for pay and reward using co-creation as a key design principle • Raise awareness on total pay and reward through various communications campaigns. • Develop and socialise a Total Reward statement and integrate as part of an attraction process 	HR	<ul style="list-style-type: none"> • Simplify approach to job design • New Job description and person specification launched <p>Recognition:</p> <ul style="list-style-type: none"> • Develop recognition toolkit for managers to use 	HR + external partner	<ul style="list-style-type: none"> • Evaluate the impact of new JD on employee experience • Offer opportunities to celebrate our success 	<ul style="list-style-type: none"> • Competitive pay and reward as an attraction mechanism • Pay is no longer a constraint in attracting the best talent • Staff perceive they are paid fairly

Co Creation Session Feedback Summary

	<p>Recognition:</p> <ul style="list-style-type: none"> Review options for informal formal recognition programmes ie. Long service award, staff awards 					
Page 385	<p>Attraction and retention</p> <ul style="list-style-type: none"> Review, simplify and decrease bias in our internal and external recruitment process, implement quick wins <ul style="list-style-type: none"> Using Videos on our recruitment pages 	HR	Introduce Values Based Recruitment	HR	<ul style="list-style-type: none"> Workforce planning and succession planning is introduced Develop/pilot systemic approach to career development in Establish internal talent pipeline for succession planning Evaluate how we are doing on promoting talent and increasing job mobility internally 	<ul style="list-style-type: none"> Apprenticeship levy is fully utilised year on year to support in work or external apprenticeship programmes Attrition is less than the London average for key skills Increased number of internal promotions and especially among those with protected characteristics
	<p>(2)Explore opportunities to address future and scarce skills gaps</p> <ul style="list-style-type: none"> Develop relationships with Croydon university hospital, Palace for Life and Croydon college as a talent management mechanism, Explore/agree processes, policies, practices on promoting talent and increasing job mobility internally, leveraging development in multiple ways – e.g. via secondments, apprenticeships, job 	HR, L&OD	<p>Establish a talent management strategy and plan and consider:</p> <ul style="list-style-type: none"> Pilot systemic approach to skills/career pathing in one directorate (1) Establish a promote internally first principle/practice where possible (3) Introduce succession planning (1) Develop/pilot career pathways for priority and/or scarce roles 	HR+L&OD	<p>Embed our talent management action plans which include:</p> <ul style="list-style-type: none"> Develop/deploy talent pools to be deployed as required to meet resource needs Rollout career pathways across scarce roles 	<ul style="list-style-type: none"> We successfully recruit to all our advertised vacancies and measure internal promotion activity

Co Creation Session Feedback Summary

	<p>shadows, work experience</p> <ul style="list-style-type: none"> Continue to recruit to and manage the National Graduate Development Programme 					
	<p>(2)Research/Review talent management approaches that will support our transformation objectives</p>	HR+ L&OD	<p>Introduce Workforce planning to more accurate project future staffing and skills needs</p>	HR	<p>Continue to develop pipelines to address skills shortages</p>	
<p>Employer Brand NB there are fewer specific actions highlighted in this pillar as our Employer Brand will be culmination of other pillar actions</p>	<p>(2)Explore/agree options of accreditations we want to pursue</p> <ul style="list-style-type: none"> Pursue Good Employer Assessment for Excellence in July 2023. <p>(3)Establish a strategic partner relationship with REED to support us in building our brand</p>	HR	<p>Pursue organisational accreditations which develop our aspirational brand which may include:</p> <ul style="list-style-type: none"> Revamp organisational presence and experience on all marketing media Consider third sector to see how they can work with us to create an enabling relationship. 	HR		<p>Attain Good Work standard award at the 'Excellent' level as recognised by the Mayor of London Investors in People recognition London Living wage accredited employer Race at Work Charter progression and recognition. 90% rating in employer promoter rating in engagement surveys</p>

LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	27 September 2023	
REPORT TITLE:	2023-24 Period 3 Financial Performance Report	
CORPORATE DIRECTOR	Jane West Corporate Director of Resources (Section 151 Officer)	
LEAD OFFICER:	Allister Bannin, Director of Finance (Deputy S151)	
LEAD MEMBER:	Cllr Jason Cummings, Cabinet Member for Finance	
KEY DECISION?	Yes	Reason: Key Decision – Decision incurs expenditure, or makes savings, of more than £1,000,000 or such smaller sum which the decision-taker considers is significant having regard to the Council’s budget for the service or function to which the decision relates
CONTAINS EXEMPT INFORMATION?	No	Public Grounds for the exemption: N/A
WARDS AFFECTED:	All	

1 SUMMARY OF REPORT

1.1 This report provides the Council’s financial performance as at Period 3 (June 2023) for the General Fund, Housing Revenue Account (HRA) and the Capital Programme. The report forms part of the Council’s financial management process for publicly reporting financial performance on a monthly basis.

Financial Performance Summary Table

Financial Performance Area	2023-24 Revised Budget (£m)	2023-24 Forecast (£m)	2023-24 Forecast Variance (£m)
Revenue Forecast (General Fund)	340.9	340.9	-
Revenue Forecast (Housing Revenue Account)	-	3.8	3.8
Capital Forecast (General Fund)	144.3	141.5	(2.8)
Capital Forecast (Housing Revenue Account)	33.2	37.3	4.1

2 RECOMMENDATIONS

For the reasons set out in the report, the Executive Mayor in Cabinet is recommended:

- 2.1** to note the General Fund revenue budget outturn is forecast to breakeven at Period 3, after the forecast utilisation of £63m capitalisation directions requested from DLUHC and £4.5m of the corporate risk contingency budget. It is not planned to utilise the risk contingency budget and directorates will work to bring the service directorate positions within budget.
- 2.2** to approve within budget inter-directorate virements from Corporate to service directorates for non-pay inflation (£20.698m) (para 4.70), economic demand pressures (£1.716m) (para 4.72), Independent Living Fund (ILF) grant now included in the Social Care Grant (£0.960m) (para 4.68), and the transfer of equal grant income and expenditure budgets for the Adult Social Care Discharge Fund and the Market Sustainability & Improvement Fund (net nil budget change) (para 4.68).
- 2.3** to note the progress in MTFS savings achievement as set out in paragraph 4.82.
- 2.4** to note the work that has commenced on the Council's Transformation Programme as set out from paragraph 4.77.
- 2.5** to note the Housing Revenue Account (HRA) revenue budget outturn is forecast to overspend by £3.8m.
- 2.6** to note the General Fund capital programme 2023-24 forecast underspend of £2.8m against the revised capital budget of £144.3m.
- 2.7** to note the HRA capital programme 2023-24 forecast overspend of £4.1m against the revised capital budget of £33.2m.
- 2.8** to note the Council's historic legacy borrowing and debt burden continues to be critical to the sustainability of the Council's revenue budget. Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regards to its level of indebtedness and balancing the budget to ensure it can deliver sustainable local government services.
- 2.9** to note that the Council continues to operate Spend Control Panels to ensure that tight financial control and assurance oversight are maintained.
- 2.10** to note that current forecasts are based on the best available information at the time and will be subject to review and change during the financial year.

3 REASONS FOR RECOMMENDATIONS

- 3.1** The Financial Performance Report is presented monthly to Cabinet and provides a detailed breakdown of the Council's financial position and the in-year challenges it faces. It covers the General Fund, Housing Revenue Account (HRA) and Capital Programme. The Financial Performance Report ensures there is transparency in the financial position, and enables scrutiny by the Executive Mayor, Cabinet, Scrutiny & Overview Committee and the public. It offers reassurance regarding the commitment by Chief Officers to more effective financial management and discipline.

4 BACKGROUND AND DETAILS

- 4.1** The 2023-24 budget approved by Council in March 2023 set a net revenue budget of £340.9m. This required capitalisation directions from government of £63m to balance, owing to resolving historical inaccurate accounting treatments and to fund the ongoing annual servicing of debt.
- 4.2** The Council's historic legacy borrowing and debt burden continues to be critical to the sustainability of the Council's revenue budget.
- 4.3** The current forecast is that the Council will breakeven against the 2023-24 General Fund revenue budget, however this is following the forecast utilisation of the £63m capitalisation directions requested from DLUHC and £4.5m of the corporate risk contingency budget. It is not planned to utilise the risk contingency budget and directorates will work to bring the service directorate positions within budget.

Cost of Living Considerations

- 4.4** There are a number of inflationary pressures that the Council, like all local authorities, is managing. The UK's Consumer Prices Index (CPI) inflation rate was 7.9% in the 12 months to June 2023, remaining high albeit lower than the Office for National Statistics (ONS) reporting in November 2022 that the CPI hit 11.1% in October 2022. This impact goes beyond the Council as the cost of living is affecting all households and businesses.
- 4.5** These macro-economic factors are impacted by international events and, therefore, well beyond the control of Croydon Council. Despite the limitations, the Council is seeking to support households wherever possible.
- 4.6** A dedicated cost of living information hub has been established on the Council's website. This provides a single source of information, informing residents of the financial support available and signposting to further support, advice and guidance. This information is continually reviewed, updated and improved.

4.7 The Council provides a wide range of support for residents that may be struggling owing to cost of living pressures. These include:

- Discretionary support for residents in financial hardship, including the Household Support Fund
- Council Tax support – for residents on a low income or in receipt of benefits, Council Tax bills could be reduced by up to 100%
- Council Tax Hardship Fund (supporting low income households that cannot afford to pay their full increase in Council Tax)
- Housing Revenue Account (HRA) discretionary fund targeted for tenants that are not in receipt of housing benefit
- Benefits calculator, to ensure residents receive the support to which they are entitled
- Energy advice, including heating and money saving options, through our Croydon Healthy Homes service
- Free holiday activity clubs with healthy meals for children
- Croydon Works to help residents into employment or to receive training to support them into work and funding of the voluntary sector to provide advice and guidance

4.8 The cost of living information hub also signposts residents to a range of support provided by other organisations in Croydon, including:

- NHS Healthy Start vouchers for families
- Free school meals
- Support from voluntary, community and faith sector organisations
- Support for businesses through the London Business Hub and the British Business Bank
- CroydonPlus credit union which offers affordable ways to manage money, including savings accounts and loans

GENERAL FUND REVENUE BUDGET SUMMARY

4.9 The General Fund revenue forecast outturn shows an overall balanced position following the forecast utilisation of the £63m capitalisation directions requested from DLUHC. The service directorates show a forecast overspend of £4.5m which is offset by utilisation of the corporate risk contingency budget. It is not planned to utilise the risk contingency budget and directorates will work to bring the service directorate positions within budget.

Table showing the revenue forecasts by Directorate

Directorate	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)	Prior Month Forecast Variance (£m)	Change in Forecast Variance (£m)
Adult Social Care and Health	129.8	43.0	131.0	1.2	1.3	(0.1)
Assistant Chief Executive	40.8	1.3	40.5	(0.3)	(0.2)	(0.1)
Children, Young People and Education	92.3	18.9	97.5	5.2	3.1	2.1
Housing	15.7	3.2	15.7	-	-	-
Resources	35.5	46.0	33.9	(1.6)	(0.4)	(1.2)
Sustainable Communities, Regeneration & Economic Recovery	65.6	15.2	65.6	-	-	-
Subtotal Service Directorates	379.7	127.6	384.2	4.5	3.8	0.7
Corporate Items and Funding	(38.8)	1.2	(43.3)	(4.5)	(3.8)	(0.7)
Total Net Expenditure Budget	340.9	128.8	340.9	-	-	-

- 4.10** Work will continue through to the end of the year to manage those areas with forecast overspends to ensure the Council remains within budget.
- 4.11** The Council continues to build on the improvements in financial management that were made last financial year. However, there is a considerable amount yet to do, which is fully recognised within the organisation.
- 4.12** A monthly budget assurance process and independent challenge of expenditure takes place. This is in addition to Cabinet and Scrutiny & Overview Committee review. The assurance meetings provide the Corporate Director of Resources (Section 151 Officer) and the Chief Executive with an opportunity to scrutinise and challenge the forecast outturn, review risks and opportunities, and ensure that savings are delivered and income targets are met. The meetings ensure the Council is doing all it can to reduce overspends and deliver a balanced budget.

DIRECTORATE VARIANCES

Adult Social Care and Health (ASCH)

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Adult Social Care Operations	111.3	38.4	112.8	1.5
Adult Strategic Commissioning, Policy & Improvement	16.7	4.1	16.6	(0.1)
Central ASCH	1.8	0.5	1.6	(0.2)
Total ASCH	129.8	43.0	131.0	1.2

- 4.13** At period 3, the ASCH directorate has a forecast overspend of £1.2m (0.9%) against a budget of £129.8m.

4.14 The ASCH Directorate has challenging savings targets totalling circa £10m to deliver in 2023-24 on placements and care packages through demand management, commissioning and review of care packages.

4.15 Risks:

- Risks continue in the provider market from inflation including higher fuel, labour and property costs which may result in claims for increased fees and/or financial instability with the potential for 'handing back' contracts. The potential reprovisioning costs if providers exit the market could be significant.

Adult Social Care Operations - Forecast overspend of £1.5m

4.16 Staffing across this division demonstrates a forecast underspend (broken down by area below) owing to periods of vacancy above the £1m MTFS 5% vacancy factor saving applied to staffing budgets in 2023-24. There is a national shortage of both social workers and occupational therapists and recruitment to many roles is proving challenging. The periods of vacancy are a barrier to achieving savings as staff are focused on statutory delivery rather than delivering transformation to improve performance, data management and reduce operational risks across the directorate.

4.17 Localities & LIFE have an underspend of (£1.6m) owing to a staffing (including agency spend) underspend of (£0.1m) and a net underspending on care costs (£1.5m).

4.18 Working Age Adults has an overspend of £4.0m. This comprises an overspend on care of £4.3m which is partly mitigated by an underspend in staffing of (£0.3m). The overspend includes savings not yet evidenced of £1.9m, against a challenging target of £5.3m. It should also be noted that this area was overspent by £2.3m in 2022-23. The service has committed to achieving further savings which will be reflected once robust plans have been developed.

4.19 Provider Services has a (£1.0m) forecast underspend on staffing owing to vacancies.

4.20 Mental health services have a forecast overspend of £0.1m owing to a £0.3m overspend on care packages partly mitigated by a (£0.2m) underspend on staffing. The overspend on care is owing to increasing demand and costs, work is ongoing to bring this area to a balanced budget.

Adult Social Care Policy and Improvement – Forecast underspend of (£0.1m)

4.21 The Policy and Improvement division is forecasting an underspend of (£0.1m) owing to staffing vacancies.

Central ASCH – Forecast underspend of (£0.2m)

- 4.22** The underspend is a result of the delays in recruitment to fixed term and temporary positions to provide additional capacity to improve performance, data management and reduce operational risks across the directorate.

Assistant Chief Executive (ACE)

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Policy, Programmes and Performance	6.1	1.4	5.8	(0.3)
Croydon Digital and Resident Access	31.8	7.2	31.6	(0.2)
Chief People Officer	2.9	0.9	3.1	0.2
Asylum Seekers and Homes for Ukraine	-	(6.3)	-	-
Central ACE	-	0.3	-	-
Total ACE (General Fund)	40.8	3.5	40.5	(0.3)
Public Health Grant Ringfenced Services	-	(2.1)	-	-

- 4.23** At period 3, the ACE directorate has a General Fund forecast underspend of £0.3m (0.7%) against a budget of £40.8m.

Policy, Programmes & Performance Division - £0.3m forecast underspend

- 4.24** Recruitment is continuing into the new staffing structure for the Policy, Programmes and Performance Division. The forecast underspend is owing to periods of vacancy of some posts in the new structure.

Croydon Digital and Resident Access Division - £0.2m forecast underspend

- 4.25** Underspends in Concessionary Travel are forecast owing to staff vacancies and a favourable final concessionary travel settlement for the year.

- 4.26** The Digital and Resident Access Division is undergoing a review to assess the achievability of in-year MTFS savings for staffing and IT contracts.

Chief People Officer Division – £0.2m forecast overspend

- 4.27** An overspend in payroll staffing is owing to delay in the implementation of the payroll restructure. This has impacted the delivery of the associated MTFS saving. Alternative measures are being taken to implement the restructure and other financial actions to seek to offset the overspend created from the delayed implementation.

Asylum Seekers and Homes for Ukraine funding – breakeven position after movement in reserves

- 4.28** The Council has received Asylum Dispersal Scheme grant funding in 2023-24 of £0.9m. The unspent grant of £0.3m in 2022-23 has been carried forward to fund ongoing expenditure in 2023-24.

4.29 The Council carried forward unspent grant under the Homes for Ukraine scheme of £5.5m, of which £1.3m is ringfenced for educational purposes. This will be used to fund ongoing expenditure in 2023-24.

Central Assistant Chief Executive – breakeven forecast

4.30 There is a breakeven forecast against budget for the Central ACE area.

Public Health Division – breakeven position in ringfenced grant after movement in reserves

4.31 It is currently forecast that Public Health will contribute £3.2m to ring fenced Public Health reserves at the end of 2023-24.

4.32 A Council wide task and finish group has been set up to address underspends in the Public Health Grant (for the current year and the accumulated balance on the balance sheet as an earmarked Public Health reserve from underspends in previous years) by identifying appropriate commissioning opportunities.

Children, Young People and Education (CYPE)

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Children’s Social Care	68.5	13.9	73.2	4.7
Unaccompanied Asylum Seeking Children (UASC) and Care Leavers	(0.3)	3.6	(0.4)	(0.1)
Quality, Commissioning and Performance Improvement	6.7	(0.6)	7.3	0.6
Non-DSG Education Services	16.8	1.9	16.8	-
Central CYPE	0.6	0.1	0.6	-
Total CYPE (General Fund)	92.3	18.9	97.5	5.2
Dedicated Schools Grant (DSG) High Needs Education Services	82.6	30.2	83.3	0.7

4.33 At period 3, the CYPE directorate has a General Fund forecast overspend of £5.2m (5.6%) against a budget of £92.3m.

Children’s Social Care Division – forecast overspend of £4.6m (including UASC and UASC Care Leavers)

£2.7m placements overspend owing to seven high-cost placements (four Residential Education SEND (no contribution from Health), two Semi-Independent and one Secure). Three of these placements are new in 2023-24. Analysis is being undertaken on a continuous basis to review these placements with the aim to reduce spend where possible.

£1.8m staffing overspend, which includes a pension budget shortfall of £0.8m since 2020-21. This was previously fully offset by underspends owing to vacancies and delays in recruitment however this cannot be accommodated in 2023-24.

£0.1m potential overspend on Adopt London South, over and above the agreed budget owing to interagency fees and staffing costs across the consortium calculated at year end.

£0.1m under-achievement in income (including £0.5m unachieved 2022-23 MTFS NHS Funding savings which have been partially offset through other income).

(£0.1m) underspend on Unaccompanied Asylum-Seeking Children (UASC) and Care Leavers owing to additional income from the Home Office for outstanding age assessment cases.

4.34 Risks:

- The Children's Social Care Division is monitoring placement and care package expenditure during the year. Pressure on placement spend is due to the sufficiency challenges both locally and nationally. The introduction of regulation for supported accommodation is predicted to increase charges as providers seek to pass on costs to Local Authorities. Costs of new Ofsted regulation and inspection regime for semi-independent placement provision could be nine times higher than government funding, whilst one in five care beds could be withdrawn, report warns – London Innovation and Improvement Alliance (LIIA).
- The division is producing service level agreements for reviewed HRA funding towards Youth Engagement and Youth Offending services, and these may result in a General Fund pressure of £0.8m.
- The division is also reviewing the housing accommodation charges from the Housing General Fund for Care Experienced Young People.

4.35 Opportunities:

- There could be some staffing underspends from periods of vacancy.
- Potential underspend of £0.3m in legal costs, if the lower numbers of care proceedings and UASC age assessment challenges continue.
- The CYPE directorate, alongside other directorates, is actively checking that grant funding including the Covid Outbreak Management Fund (COMF) are allocated correctly against eligible expenditure and this could reduce the forecast overspend position.

Quality, Commissioning and Performance Improvement Division – forecast overspend of £0.6m

4.36 The division is forecasting a staffing overspend of £0.2m from the 5% vacancy factor MTFS saving of £0.3m applied to the 2023-24 budget as a number of teams are fully staffed. The pressure may reduce during the year if there are periods of vacancy.

There is an anticipated Public Health contribution of £0.4m which never materialised. This relates to a 2022-23 MTFS saving and will be reviewed by the cross-Council Public Health funding task and finish group.

Non-DSG Education services – forecast breakeven

4.37 Non-DSG Education services are forecasting a breakeven position owing to an underspend from staffing vacancies which is offsetting income pressures (including £0.3m unachieved 2022-23 MTFs NHS Funding savings).

4.38 Risk

- The £0.3m unachieved income budget within the High Needs General Fund budget poses an indirect financial risk to the Safety Valve target should other activities or resources (EHCP Coordinators) required to deliver the Safety Valve target be reduced to offset the £0.3m potential shortfall. The service is exploring all mitigating options available.

Dedicated Schools Grant (DSG) High Needs education services – forecast overspend of £0.655m

4.39 The SEND High Needs forecast at Period 3 is an overspend of £0.655m against the budget of £82.566m. There is no movement from the Period 2 position which represents £0.070m favourable variance from the expected overspend of £0.725m submitted to the Department of Education (DfE) Safety Valve Team as part of the approved Deficit Recovery Plan. The service is delivering all of the savings strategies as set out in the Safety Valve (SV) agreement including the use of the High Needs Provision Capital Allocation (HNPCA) to help deliver more local schools places as well as improve existing provisions to meet the increasing placement demands for complex needs pupils. Following receipt of our monitoring report the DfE have approved the next Safety Valve payment of £3.290m.

4.40 See below the key areas:

£2.174m Out of Borough and Independent – Forecast overspend due to an increase in complex cases above that expected, requiring out of borough placement to meet needs. The service is in discussions with some local providers to set up Enhanced Learning Provision during the Autumn Term.

£0.954m overspend due to increased placements in Mainstream Education provision exceeding the budgeted allocation. This forms part of the invest to save SEND strategy in year 2.

(£0.250m) underspend in Early Years provision.

(£0.250m) underspend in Top up funding related to delayed implementation of the proposed expansion of Enhanced Learning Provision across a few schools.

(£0.953m) underspend in the Service Transformation budget set up to support the DSG Deficit Recovery strategy.

(£0.400m) underspend in funding related to staffing cost in therapies and support services cost owing to service re-alignment to maximise savings.

(£0.620m) expected clawback from specific Resource Provision (academies) for extra funding received from DfE.

4.41 Dedicated Schools Grant (DSG) High Needs education services will continue to closely monitor the demands pressures in Independent and Out of Borough placement owing to cost implications. Addington Valley Academy, St Nicholas, Coulsdon College Croydon, and Waddon Youth Disability Services are increasing placement numbers, which is reducing high-cost placements out of borough.

4.42 The 2023-24 period 3 High Needs forecast outturn variance of £0.655m leads to an overall DSG deficit projection of £16.039m at the end of 2023-24 compared to the Safety Valve target of £16.080m prior to the £3.29m Deficit Recovery payment expected from the DfE as per the Safety Valve agreement. This shows that the local authority is ahead of the target.

4.43 Risks

- The service is monitoring all the risks associated with the Safety Valve target which includes increasing complexity of needs requiring additional funding for special schools and extra out of borough placements to meet the local needs of some CYP pupils with complex needs.

Housing

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Resident Engagement and Allocations	15.6	3.1	15.6	-
Housing Estates and Improvement	0.1	0.1	0.1	-
Total Housing	15.7	3.2	15.7	-

4.44 At period 3, the Housing directorate has a General Fund forecast breakeven against the budget of £15.7m.

Emergency Accommodation – breakeven forecast

4.45 Breakeven forecast at period 3, following the transfer of non-pay inflationary pressures budget from corporate (as requested through this report). The number of households supported in homelessness accommodation have not increased significantly over the last year but as landlords are withdrawing accommodation from the temporary accommodation schemes more families are housed in the expensive nightly-paid bed & breakfast (B&B) and hotel accommodation.

4.46 A top-up to Homelessness Prevention Grant (HPG) of £1.9m has been announced by DLUHC to cover homelessness pressures related to Ukrainian refugees. This funding may also be used to fund wider homelessness pressures and reporting requirements

are in line with the existing HPG requirements. The grant top-up would also help fund any potential detriment to income collection resulting in the bad debt provision being increased at year end.

- 4.47** Forecasting costs and income has been challenging due to the changeover to the NEC software package. Some reporting information is not yet available from the new NEC system such as the number of units of various types rented and associated costs. Therefore, purchase orders receipted to date are currently being used to forecast costs.

Temporary Accommodation – breakeven forecast

- 4.48** Numbers of households in temporary accommodation are expected to fall slightly and steadily across the year. Inflationary cost pressures will be covered through allocation from the corporate non-pay inflation budget (requested through this report).
- 4.49** There is a potential financial risk from the fire at Sycamore House in Thornton Heath depending on the insurance claim settlement not yet finalised at period 3. This risk was considered in closing the 2022-23 accounts and so any difference in the estimated income of 70% of costs from the insurers will either be a charge or a benefit in the 2023-24 accounts.

4.50 Risks

4.50.1 Restructure

- There is currently a temporary structure within Housing, however a restructure is being carried out to strengthen the directorate.
- Pressures are expected to continue in 2023-24. The restructure for Housing Options is underway and will form the bedrock for process change and a more cohesive journey for a homeless household. An immediate switch to better practice and dramatically reduced spend on homelessness cannot be expected within 2023-24 whilst significant change is underway, and the financial benefits are expected to be realised in the longer term.

4.50.2 Inflation

- The Housing Directorate continues to be impacted by the rapidly worsening housing market within London as private sector landlords are increasing rents or leaving the market, and tenants are struggling with cost-of-living pressures. The challenge for Croydon in dealing with such rapid inflation has multiple strands. There are forecasting difficulties in predicting how much prices are expected to move and at what pace. This is being addressed alongside a wholesale review of the forecasting process to ensure that reporting provides the full position on risk in 2023-24.
- There are difficulties in negotiating and approving price rises without losing properties or fuelling the rises further. Regular meetings with

neighbouring boroughs are being held to ensure collective agreements are being made with the larger providers of emergency accommodation.

4.50.3 Reduced Supply

- There is also the issue of entering into 2 to 5 years lease deals with landlords as 39% nationally exited the market in 2022-23 and prices have dramatically increased as a result. In 2022-23 this meant a 10% increase in the use of nightly paid accommodation was seen. The strategy work currently underway in the directorate will seek to address this issue.
- There has been a concerted effort to hold homelessness accommodation costs down across London through partnerships with organisations like Capital Letters and via the agreed Pan-London temporary accommodation rates. The rates can no longer be contained though as demand outweighs available affordable supply. At a Pan London meeting, all boroughs confirmed that they are no longer paying the agreed Pan London rates to ensure they meet their demand challenges. A combination of all these factors has led to an increase in both the average cost of emergency and temporary accommodation that Croydon can secure to meet demand, as well as an increase in the use of nightly paid emergency accommodation to compensate for the loss of some longer-term leased accommodation because of landlords leaving the market.

4.50.4 Income Collection

- Income collection rates will need to be monitored closely in 2023-24. There may be a requirement to increase the loss allowance (bad debt provision) again in 2023-24 if income collection is not significantly improved. A new housing IT system (NEC) has been implemented in June 2023 which will improve monitoring and reporting when it is fully operational later in the year.
- Forecasting income has been challenging due to the changeover to the NEC system. A delay to the interfaces between NEC and the Oracle finance system has meant that no income has been posted to Oracle since 17 May from the new NEC system.

4.50.5 Temporary Accommodation Benefit Subsidy Loss

- There is a budget pressure, estimated at £1.2m for 2023-24, in relation to housing benefit subsidies for the Guaranteed Rent Scheme for Care Experienced Young People. The pressure impacts the Housing Directorate as it forms part of the cost of temporary accommodation. As detailed in the Corporate Items and Funding section (para 4.73), this report is requesting a transfer of £1.2m budget from the economic demand pressures budget to Housing. The housing benefit subsidy pressure will be monitored throughout the year and mitigated where possible.
- There is a temporary accommodation cost due to the £40/week/unit management fee for TA which is paid through Housing Benefit but not

recoverable through subsidy from DWP. This forecast cost of £2.4m is covered corporately in 2023-24.

Resources

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Commercial Investment	18.9	3.5	16.9	(2.0)
Finance (<i>refer note 1</i>)	15.7	38.8	15.7	-
Legal Services and Monitoring Officer	2.3	1.1	2.6	0.3
Insurance, Anti-Fraud and Risk	0.6	2.0	0.6	-
Internal Audit Service	0.4	0.2	0.5	0.1
Pensions and Treasury	0.3	0.3	0.3	-
Central Resources	(2.7)	0.1	(2.7)	-
Total Resources	35.5	46.0	33.9	(1.6)

Note 1: The actuals to date are high in the Finance Division owing to Housing Benefits expenditure which will be reimbursed through DWP funding.

- 4.51** At period 3, the Resources directorate has a General Fund forecast underspend of £1.6m (4.5%) against a budget of £35.5m.

Commercial Investment Division – £2m forecast underspend

- 4.52** The division is forecasting a £2m underspend owing to decreased utilities costs and improved recharging to external bodies. There are also £0.6m of staffing underspends across the division, mainly in Facilities Management due to periods of staffing vacancy, which are being offset by a forecast decrease in recharges to capital.

Finance Division – breakeven forecast position

- 4.53** There is a breakeven forecast position for the Finance Division. The Payments, Revenues, Benefits and Debt Service is forecasting a staffing underspend owing to staffing vacancies and increased court costs income, but these are being offset by decreased Land Charges income and temporarily increased agency staffing in strategic finance to work through historic accounting issues including the prior years' accounts.
- 4.54** A cross Council working group is currently operating to mitigate Housing Benefit subsidy risks by maximising Housing Benefit (HB) subsidy income claims, increasing collection of HB overpayments and reducing costs. The actuals to date are high in the Division owing to Housing Benefits expenditure which will be reimbursed through DWP funding.
- 4.55** The Finance Division will undergo a restructure of the strategic finance service in 2023-24 and then commence recruitment into roles which are currently covered by agency staffing. The capacity and skills levels required in the strategic finance service have

been reviewed and extra funding from growth and/or reserves has been requested for 2024-25.

Legal Services and Monitoring Officer Division – £0.3m forecast overspend

- 4.56** There is a £0.1m forecast underspend in the Monitoring Officer service owing to staff vacancies and an underspend against the members allowances budget.
- 4.57** There is a forecast overspend in Legal Services of £0.4m mainly owing to high levels of agency staffing.
- 4.58** The Legal Services and Monitoring Officer Division is reviewing usage of external legal advice, with a view to increase the inhouse staffing structure (moving budget from external legal expenditure in directorates) to provide more legal services internally and therefore reduce overall legal expenditure for the Council.

Other Service Areas and Central Resources - £0.1m forecast overspend

- 4.59** There is a £0.1m forecast overspend in Internal Audit expenditure. Within Insurance, Anti-Fraud and Risk a forecast overspend on insurance claims is being offset by a forecast staffing underspend due to periods of staffing vacancy.

Sustainable Communities, Regeneration & Economic Recovery (SCRER)

Division	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Sustainable Communities	50.3	12.5	50.3	-
Culture and Community Safety	8.6	0.7	7.9	(0.7)
Planning & Sustainable Regeneration	6.7	3.0	7.4	0.7
Central SCRER	-	(1.0)	-	-
Total SCRER	65.6	15.2	65.6	-

- 4.60** At period 3, the SCRER directorate has a General Fund forecast breakeven position against a budget of £65.6m. The main potential risk areas relate to income in the areas of parking, parking enforcement, moving traffic offence and planning.

Sustainable Communities Division - breakeven forecast

- 4.61** There is a forecast £1.9m under-achievement in parking, parking enforcement and moving traffic offence income. This is being offset through a forecast underspend of £1.4m in staffing owing to periods of vacancy and a £0.5m forecast underspend in waste services owing to reduced level of domestic waste.

4.62 Risks

- Demand for parking services has not returned to pre-pandemic levels and this is affecting all areas of parking which includes Automated Number Plate Recognition (ANPR), pay and display and on-street parking.

- Parking Services have had delays in connection with the roll out of new ANPR cameras which affect the income levels within the service.
- The Environment Act 2021 operates as the UK's new framework of environmental protection. Given that the UK has left the EU, new laws that relate to nature protection, water quality, clean air, as well as additional environmental protections that originally came from Brussels, needed to be established. The Act is a vehicle for a number of Department for Environment, Food and Rural Affairs' (Defra) different environmental policies and sets out the legal framework for significant reforms to local authority waste and recycling services, as well as creating new statutory duties for local authorities on nature recovery. The government has stated that additional burdens funding will be provided to local authorities for the new requirements as they come into force, however the Council will need to monitor closely the extra costs involved.
- There is a potential risk to new Roads and Street Works Act income owing to delays and disputes with utility companies. Further work is being undertaken to quantify these risks and where possible mitigate the effect.

Culture and Community Safety Division – forecast underspend of £0.7m

- 4.63** The division is forecasting an underspend of £0.7m due to reduced costs on utilities in contracts (£0.6m) and periods of staffing vacancy (£0.1m).
- 4.64** The Culture and Community Safety Division leads on the London Borough of Culture 2023 activities, funded through external funding sources. This is a year-long celebration of Croydon's unique identity, diverse communities and rich heritage, culture and creativity. The programme for "This is Croydon" showcases Croydon to the world. It includes major events with international headliners performing alongside emerging home-grown talent, plus hundreds of cultural activities from our communities.

Planning and Sustainable Regeneration Division – forecast overspend of £0.7m

- 4.65** The division is forecasting an income under-achievement of £0.7m owing to lower activity levels to date in planning major applications and planning performance agreements.

Corporate Items and Funding

Area of Spend	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Inflation and Economic Demand Pressures	36.6	-	36.6	-
Risk Contingency Budget	5.0	-	0.5	(4.5)
Transformation Programme	10.0	-	10.0	-
Other corporate items	(90.4)	1.2	(90.4)	-
Total Corporate items and Funding	(38.8)	1.2	(43.3)	(4.5)

- 4.66** At period 3, the Corporate directorate has a General Fund forecast underspend of £4.5m (11.6%) against a net budget of (£38.8m). The underspend relates to the risk contingency budget which is offsetting the pressures across the service areas.
- 4.67** The corporate area holds funding streams such as Council Tax, retained share of Business Rates and Core Grants. The corporate budget also holds the Council-wide risk contingency budget (£5m) and the budgets for borrowing and interest received.
- 4.68** The Executive Mayor in Cabinet is requested to approve inter-directorate virements from Corporate to the Adult Social Care & Health (ASCH) directorate relating to core grants. The ASCH directorate is leading on the use of the Adult Social Care Discharge Fund (£1.399m) and the Market Sustainability & Improvement Fund (£2.335m), in partnership working with the NHS, and therefore the equal grant income and related expenditure budgets are requested to be moved to the ASCH directorate (nil change to net budgets). The government consolidated the Independent Living Fund (ILF) grant (£0.960m) into the Social Care Grant and therefore it is requested to move £0.960m budget to ASCH to remove the separate ILF grant income budget in the directorate (all actual income will now be allocated against the Social Care Grant income budget held corporately).
- 4.69** The corporate area funds redundancy, severance and pension strain costs which contribute to achieving General Fund MTFs savings. There may be a pressure in 2023-24 from this area of costs owing to the implementation of staffing savings.
- 4.70** The corporate area holds the central budget for pay and non-pay inflation. The requirement for directorates has been reviewed for inflation experienced on contracts and a £20.7m inter-directorate virement from the central budget is requested to be agreed by the Executive Mayor in Cabinet as detailed in the table below.

Table showing allocations to directorates for 2023-24 non-pay inflation

Directorate	Non-pay inflation budget (£m)
Adult Social Care and Health (refer note below)	7.371
Assistant Chief Executive	0.740
Children, Young People and Education	3.875
Housing	4.742
Resources	0.200
Sustainable Communities, Regeneration & Economic Recovery	3.770
Total	20.698

Note: The gross inflationary requirement for Adult Social Care & Health is £12.447m. The 2023-24 budget for ASCH already included £4.119m growth relating to inflation and £0.957m of inflation has been funded through the Market Sustainability and Improvement Fund. Therefore the remaining budget requirement is £7.371m.

4.71 The NJC national negotiations on the 2023-24 pay award for staff are ongoing and the resulting required budget allocation may create a pressure above the central allowance of £11m.

4.72 There is budget of £5.5m held centrally for the potential impact of economic demand pressures on Croydon. It is requested through this report that an inter-directorate virement is agreed to allocate £1.7m budget for Housing Benefit subsidy pressures as per the following table.

Table showing allocations to directorates for Housing Benefit subsidy pressures

Directorate	Service Area	Economic demand pressures budget (£m)
Adult Social Care and Health	Shared Lives Scheme	0.516
Housing	Guaranteed Rent Scheme for Care Experienced Young People	1.200
Total		1.716

4.73 The corporate area also holds the 2023-24 Transformation budget of £10m, which will fund work carried out in directorates and cross-Council to achieve MTFs savings and improve services for local residents and businesses. The Transformation budget reduces to £5m from 2024-25.

4.74 There is £7.3m budget held in Corporate for adjustments to correct General Fund recharge budgets for recharges to the HRA, Public Health, capitalisation of salaries and corporate support (overhead) recharges. This budget will be allocated during 2023-24 as the service level agreements (SLA's) are finalised for HRA and Public Health recharges, and when the review of salary capitalisation and corporate support recharges is finalised.

4.75 There is a funding risk in the Collection Fund if cost of living pressures impact the collection of Council Tax and Business Rates income. The impact of the Council Tax increase is partially mitigated through the Council Tax Hardship Fund (supporting low income households that cannot afford to pay their full increase in Council Tax).

4.76 There is borrowing cost uncertainty from interest rates (with the Bank of England currently continuing to increase the base rate) and the timing of capital receipts from asset disposals (assumed in the MTFs at circa £50m per annum).

Transformation Programme

4.77 The Transformation Programme has £14m of resources allocated to it, £4m in the 2022-23 Capital Programme and £10m in the 2023-24 revenue budget. The Transformation Programme published in November 2022 set out £5.9m of project commitments with recognition that further sums were still to be confirmed. Capital funding can only be utilised for spend that creates an asset, eg. an IT system. Please note that project plans are under development and following review of these project

plans the draft budget allocations to projects as listed above could change through the year.

- 4.78** In total there is currently £9.4m of the Transformation Programme budget allocated with £4.6m unallocated to date. The Transformation Programme will provide a return on investment through service improvement benefits and the identification and delivery of savings for the medium term financial strategy, providing a significant level of savings towards the £20m per annum savings required from 2025-26 onwards.

Transformation Programme Allocations

Project	2023-24 Draft Budget Allocation (£m)
Transformation Revenue Budget	10.000
Transformation Capital Budget	4.049
Total Transformation Funding	14.049
Approach to Strategic Planning and Commissioning	0.290
Parking Policy Review	0.200
Community Hubs Programme	0.250
HR Transformation	0.078
Digital & Resident Access Review/Digital Workforce	0.080
SEND Review	0.240
Passenger/SEND Transport Transformation	0.100
Family Justice Service Review	0.100
S117 Project	0.178
Joint Funding Arrangements	0.110
Sustaining Demand at the Front Door	0.190
Fostering Transformation	0.286
Corporate Parenting Transformation	0.457
Dynamic Purchasing System	0.092
Callydown Transformation	0.134
Income & Debt Review	0.050
Outcomes Based Domiciliary Care Model	0.110
Transition Commissioning Care Model	0.082
Croydon Campus	0.250
Customer Access Review	0.200
Building Control Transformation	0.450
Planning & CIL Transformation	0.300
CALAT	0.050
Housing Needs Restructure	0.060
Temporary Accommodation Case Review	0.291
Housing Occupancy Checks	0.291
Rent Accounts and Data Cleanse	0.026
Housing Association Recharges	0.059
Supported Housing Review	0.080
Adult Social Care Transformation	1.100
Review of Social Care Placements	0.461
Reablement & Hospital Discharge	0.060
Strategic Operating Model Design Partner	1.134
Housing Benefit Subsidy SEA & E/TA	0.000

Project	2023-24 Draft Budget Allocation (£m)
PFI Contract Manager	0.000
VCS Review	0.000
Asset Rationalisation	0.000
Business Intelligence Review	0.000
Commercial & Income Opportunities	0.000
Community Equipment Service	0.040
Croydon Museum	0.270
Oracle Improvement Programme	0.175
Transformation PMO	1.100
Total Revenue and Capital Budget Allocated to Date	9.424
Unallocated To Date	4.625

4.79 The Transformation Programme published in November 2022 set out £5.9m of project commitments with recognition that further sums were still to be confirmed. Please note that project plans are under development and following review of these project plans the draft budget allocations to projects as listed above could change through the year.

4.80 The Transformation Board has agreed additional project allocations totalling £2.99m through to July 2023 and these are set out in the table below.

Project Allocations	£m
Fostering transformation	0.194
Sustaining demand at the front door	0.080
Callydown transformation	0.134
Review of Social Care Placements	0.456
CALAT (New)	0.050
Strategic operating model design partner	0.500
Strategic operating model design partner – project team	0.634
Corporate Parenting Transformation (New)	0.457
Community Equipment Service	0.040
Museum Transformation	0.270
Oracle Cloud Improvement (New)	0.175
Total of Allocations	2.990

4.81 The ‘Review of Social Care Placements’ project has secured £600,000 alternative funding from the Market Sustainability Grant thereby reducing the funding required from the Transformation budget. The revenue budget also funds the costs of the transformation Programme Management Office currently estimated at £1.1m.

Savings

4.82 The 2023-24 budgets include a challenging new savings target of £33.1m. Progress in achieving savings is being monitored throughout the year. Directorates are identifying any risks to achievement of individual savings and making plans to mitigate these risks where possible or identify alternative savings as required.

Table showing 2023-24 forecast savings achievement by directorate

Directorate	2023-24					
	Savings target £'000	Slippage from previous year £'000	Revised Savings target £'000	Forecast savings achievable £'000	Savings slippage £'000	Not yet evidenced or (over delivery) £'000
Adult Social Care & Health	12,243	-	12,243	10,368	-	1,875
Assistant Chief Executive	2,924	-	2,924	1,771	1,153	-
Children, Young People & Education	6,920	490	7,410	5,130	18	2,262
Housing	2,305	-	2,305	1,309	1,099	(103)
Resources	6,347	-	6,347	6,347	-	-
Sustainable Communities (SCRER)	1,859	2,490	4,349	4,124	225	-
Cross-Directorate / Corporate	500	-	500	500	-	-
Total	33,098	2,980	36,078	29,549	2,495	4,034

Reserves

- 4.83** There are no budgeted contributions to, or drawdowns from, the General Fund balances of £27.5m in 2023-24. The current breakeven forecast for 2023-24 maintains this reserve.

General Fund Balances	Forecast (£m)
Balance at 1 April 2023	27.5
Forecast Contribution to/(Drawdown from) Reserves	-
Forecast Balance at 31 March 2024	27.5

- 4.84** The General Fund balances serve as a cushion should any overspend materialise by the end of 2023-24. The use of reserves to support the budget is not a permanent solution and reserves must be replenished back to a prudent level in subsequent years if used.

Unresolved Issues

- 4.85** The Council's overall financial position is still subject to a number of unresolved historic legacy issues. The latest position on these was set out in the 22 February 2023 Cabinet report titled 'Revenue Budget and Council Tax Levels 2023-24' which incorporated the findings of the 'Opening the Books' review undertaken in 2022-23. The report stated that a request has also been made of government to provide the Council with a Capitalisation Direction of £161.6m to cover the historic finance issues that have been revealed through the 'Opening the Books' programme.

- 4.86** The Council needs to correct a range of misstatements in its legacy accounts from 2019-20 which are currently still not fully closed. This was more than the £74.6m previously identified in the MTFs Update report to Cabinet in November 2022.
- 4.87** The Council's Provision for Bad Debt was found to be understated by £46m rather than the £20m previously assumed and a prudent decision was made to include the potential £70m gap in the accounts caused by incorrect accounting for Croydon Affordable Homes and Tenures, instead of the £9m previously assumed.
- 4.88** With four years of accounts still open, there remains a risk that further legacy issues will be uncovered. The Capital Programme for 2022-23 included the £161.6m Capitalisation Direction requested, which was in addition to the £25m capitalisation direction previously approved.

Housing Revenue Account (HRA)

- 4.89** At period 3, the Housing Revenue Account (HRA) has a forecast overspend of £3.8m.

Repairs

£3.8m overspend on disrepair costs including void and repair costs, legal fees and settlement costs.

Tenancy and Income

Breakeven forecast at period 3. Additional budget was allocated in 2023-24 to meet known pressures.

Staffing and other

Breakeven forecast at period 3.

Table showing the 2023-24 HRA forecast

Description	Net Budget (£m)	Actuals to Date (£m)	Forecast (£m)	Forecast Variance (£m)
Rental Income	(82.1)	(12.1)	(82.1)	-
Service Charge Income	(4.6)	(0.7)	(4.6)	-
Other Income	(9.4)	1.0	(9.4)	-
Subtotal Income	(96.1)	(11.8)	(96.1)	-
Centralised Directorate expenditure	52.2	(0.9)	52.2	-
Responsive Repairs & Safety	20.4	4.6	24.2	3.8
Asset Planning	1.6	0.1	1.6	-
Capital Delivery (Homes & Schools)	1.5	0.1	1.5	-
Tenancy & Resident Engagement	10.3	4.6	10.3	-
Homelessness & Assessments	3.4	0.4	3.4	-
Service development and income	6.7	0.0	6.7	-
Subtotal Expenditure	96.1	8.9	99.9	3.8
Total HRA Net Expenditure	-	(2.9)	3.8	3.8

4.90 The main risks within the Housing Revenue Account are:

- Repairs and maintenance:
 - pressures from the exit of the current Axis repairs contract, ending in August 2023.
 - extra expenditure to deal with the backlog of repairs and maintenance.
 - void and disrepair costs carried out by specialist contractors to reduce void losses and minimise future disrepair claims.
 - settlement of disrepair cases and related legal fees, including those relating to Regina Road.

- Tenancy and income:
 - the impact of cost-of-living pressures on rent collection (including a potential increase in bad debt cost).
 - loss of income owing to void (empty) residential properties.
 - loss of income owing to void garages.

- Recharge review:
 - General Fund services are producing service level agreements (SLA's) to evidence recharges of costs to the HRA, which could result in increased charges to the HRA.

- NEC system functionality delays:
 - Although the system has gone live in June 2023 there has not yet been feeds into the Oracle financial system. Therefore, the income & repairs forecasting could be understated and will not be known until actuals can be properly analysed.

Capital Programme and Financial Sustainability

- 4.91** The Capital strategy and programme was approved by Council in March 2023. This recognised the complex and challenging financial and operational circumstances in which the Council continues to operate. It showed a 2023-24 Capital Programme that is reduced in scale and cost compared to previous years. With circa £1.3bn of General Fund debt and an environment of rising interest rates, the delivery of an effective Asset Management Plan and an ambitious Asset Disposal Strategy, including reducing the number of buildings used by the Council, will be essential to mitigate rising cost pressures, reduce the overall debt burden and help the Council balance its books.
- 4.92** The strategy reflected the progress made to date by the Council to improve the governance and financial management of the Capital Programme following recommendations from the two Reports in the Public Interest (RIPI). The Council understands that the initial improvements put in place are the foundations of good practice and is focused on building upon these over the coming months and years.
- 4.93** Concerns were highlighted regarding value for money and investment decisions as the Council has incurred debt in investing in assets which have not retained their value and, therefore, the level of debt exceeds the value of the investment assets. In the three years between 2017-20 the Council borrowed £545m with no focused debt management plan in place. The majority of this debt comprises short-term borrowings which has left the Council exposed to current higher interest rates. The debt is anticipated to be refinanced from 2023 onwards and therefore likely to drive significant increases in annual repayment levels.
- 4.94** An estimated circa £66m is required to service this debt from the General Fund which represents around 19% of the Council's net budget. The Council's historic legacy borrowing and debt burden has, therefore, become critical to the sustainability of the Council's revenue budget.
- 4.95** The Council has concluded that the expenditure it is anticipated to incur in each year of the period of 2023-27 is likely to exceed the financial resources available and that reaching financial and operational sustainability without further government assistance will not be possible. The Council's 2023-24 budget required capitalisation directions from government of £63m to balance and the Medium Term Financial Strategy (MTFS) demonstrated an ongoing estimated budget gap of £38m per annum from 2024-25.
- 4.96** Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regards to its level of historic legacy indebtedness and balancing the budget to ensure it can deliver sustainable local government services. It must be noted that annual capitalisation directions (transferring revenue cost into capital cost which must be funded over 20 years) increases the Council's debt burden. Debt write-off is the Council's preferred option and, therefore, a request was made to DLUHC in January 2023 for government funding to write-off £540m of the Council's General Fund debt.

DLUHC has subsequently asked the Council to propose a wider range of options, and these are currently being worked on.

General Fund Capital Programme

4.97 At period 3, the General Fund capital programme has a forecast underspend of £2.8m against the revised budget of £144.3m.

Table showing 2023-24 General Fund Capital Programme budget and forecast.

General Fund Capital Scheme	2023-24 Revised Budget (£000's)	2023-24 Actuals to Date (£000's)	2023-24 Forecast (£000's)	2023-24 Forecast Variance (£000's)
Bereavement Services	127	(84)	127	-
My Resources Interface Enhancement	252	-	252	-
ICT	-	1	-	-
Network Refresh	348	11	348	-
Tech Refresh	132	216	864	732
Geographical Information Systems	312	-	312	-
Laptop Refresh	3,371	-	3,371	-
Cloud and DR	331	26	331	-
People ICT	-	3	-	-
Synergy Education System	1,045	-	789	(256)
NEC Housing System	2,725	(37)	2,097	(628)
Uniform ICT Upgrade	56	-	56	-
Subtotal Assistant Chief Executive	8,699	136	8,547	(152)
Education – Fire Safety Works	924	-	924	-
Education - Fixed Term Expansions	2,865	147	2,865	-
Education - Major Maintenance	5,866	656	5,866	-
Education - Miscellaneous	100	-	100	-
Education - Permanent Expansion	297	-	297	-
Education - SEN	6,289	189	6,289	-
Angel Lodge Children Home	329	-	329	-
Subtotal CYPE	16,670	992	16,670	-
Disabled Facilities Grant	4,710	208	3,000	(1,710)
Empty Homes Grants	400	-	300	(100)
Subtotal Housing	5,110	208	3,300	(1,810)
Asset Strategy - Stubbs Mead	500	-	500	-
Asset Strategy Programme	240	-	240	-
Clocktower Chillers	382	-	382	-
Corporate Property Maintenance Programme	2,780	430	2,780	-
Fairfield Halls - Council	625	3	625	-

General Fund Capital Scheme	2023-24 Revised Budget	2023-24 Actuals to Date	2023-24 Forecast	2023-24 Forecast Variance
	(£000's)	(£000's)	(£000's)	(£000's)
Former New Addington Leisure Centre	600	-	600	-
Fieldway Cluster (Timebridge Community Centre)	248	-	248	-
Contingency	1,000	-	1,000	-
Subtotal Resources	6,375	433	6,375	-
Allotments	-	(14)	-	-
Growth Zone	11,245	10	11,245	-
Grounds Maintenance Insourced Equipment	1,200	-	1,200	-
Highways	8,086	2,025	8,086	-
Highways - flood water management	404	141	404	-
Highways - bridges and highways structures	968	559	968	-
Highways - Tree works	50	26	50	-
Local Authority Tree Fund	83	10	83	-
Trees Sponsorship	42	10	42	-
Leisure centres equipment Contractual Agreement	139	(410)	139	-
Tennis Court Upgrade	75	-	75	-
Leisure Equipment Upgrade	148	-	148	-
Libraries Investment - General	1,031	-	1,031	-
Central Library Digital Discovery Zone	175	-	175	-
New Investment to South Norwood Library	520	-	520	-
Parking	1,843	11	1,843	-
Cashless Pay & Display	1,463	-	1,463	-
Play Equipment	17	28	28	11
Safety - digital upgrade of CCTV	1,540	(11)	1,540	-
Highways Road Markings/Signs (Refresh)	137	-	137	-
South Norwood Good Growth	773	9	747	(26)
Kenley Good Growth	394	(158)	394	-
Sustainability Programme	1,100	-	300	(800)
TFL - LIP	4,568	533	4,568	-
Cycle Parking	332	-	332	-
Electric Vehicle Charging Point (EVCP)	1,019	-	1,019	-
Park Asset Management	700	-	700	-
Waste and Recycling Investment	2,558	-	2,558	-
Subtotal SCRER	40,610	2,769	39,795	(815)
Capitalisation Direction	63,000	-	63,000	-
Transformation Spend (Flexible Capital Receipts)	3,868	-	3,868	-

General Fund Capital Scheme	2023-24 Revised Budget	2023-24 Actuals to Date	2023-24 Forecast	2023-24 Forecast Variance
	(£000's)	(£000's)	(£000's)	(£000's)
Subtotal Corporate Items and Funding	66,868	-	66,868	-
Total General Fund Capital	144,332	4,538	141,555	(2,777)

Table showing General Fund Capital Programme Financing

General Fund Capital Financing	2023-24 Revised Budget	2023-24 Forecast	2023-24 Forecast Variance
	(£000's)	(£000's)	(£000's)
Community Infrastructure Levy (CIL)	6,600	6,600	-
CIL Local Meaningful Proportion (LMP)	3,084	2,284	(800)
Section 106	1,712	1,712	-
Grants & Other Contributions	25,832	24,096	(1,736)
Growth Zone	12,145	12,145	-
HRA Contributions	1,772	1,363	(409)
Capital Receipts	48,868	48,868	-
Borrowing	44,320	44,488	168
Total GF Capital Financing	144,332	141,555	(2,777)

4.98 The extra forecast cost of play equipment of £11k will be funded through the application of Section 106 funding.

HRA Capital Programme

4.99 At period 3, the HRA capital programme has a forecast overspend of £4.1m (12%) against the revised budget of £33.248m. This is owing to increased repairs and improvements activity to reduce the backlog of repairs.

Table showing 2023-24 HRA Capital Programme budget and forecast

HRA Capital Scheme	2023-24 Revised Budget	2023-24 Actuals to Date	2023-24 Forecast	2023-24 Forecast Variance
	(£000's)	(£000's)	(£000's)	(£000's)
Major Repairs and Improvements Programme	31,476	1,831	35,549	4,073
NEC Housing System	1,772	-	1,772	-
Total HRA Capital	33,248	1,831	37,321	4,073

HRA Capital Programme Financing

HRA Capital Financing	2023-24 Proposed Revised Budget	2023-24 Forecast	2023-24 Forecast Variance
	(£000's)	(£000's)	(£000's)
MRR	16,082	16,082	-
Revenue	13,900	13,900	-
Reserves	1,148	5,221	4,073
Right To Buy (RTB) Receipts	2,118	2,118	-
Total HRA Capital Financing	33,248	37,321	4,073

4.100 It is currently assumed that the forecast overspend in the Major Repairs and Improvements Programme will be financed through HRA reserves, however the source of HRA financing is still to be finalised.

5 ALTERNATIVE OPTIONS CONSIDERED

5.1 None.

6 CONSULTATION

6.1 None.

7. CONTRIBUTION TO COUNCIL PRIORITIES

7.1 The monthly financial performance report supports the Mayor's Business Plan 2022-2026 objective one "The council balances its books, listens to residents and delivers good sustainable services".

8. IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

8.1.1 Finance comments have been provided throughout this report.

8.1.2 This report includes the request for approval of the allocation of non-pay inflation expenditure budget and economic demand pressures expenditure budget to service directorates. These budgets were agreed as part of the 2023-24 budget approved by Council in March 2023. The budgets are initially held corporately and allocated out to applicable service directorates once the pressures are calculated and evidenced during the year, to ensure that the budgets are used to fund the expenditure purpose originally agreed by Council.

- 8.1.3** The Council continues to operate with internal spending controls to ensure that tight financial control and assurance oversight are maintained. A new financial management culture is being implemented across the organisation through increased communication on financial issues and training for budget managers.
- 8.1.4** The Council currently has a General Fund Reserve of £27.5m which serves as a cushion should any overspend materialise by the end of 2023-24. The use of reserves to support the budget is not a permanent solution and reserves must be replenished back to a prudent level in subsequent years if used.
- 8.1.5** The Council's historic legacy borrowing and debt burden continues to be critical to the sustainability of the Council's revenue budget. Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regards to its level of indebtedness and balancing the budget to ensure it can deliver sustainable local government services.

Comments approved by Allister Bannin, Director of Finance (Deputy s151 Officer).

8.2 LEGAL IMPLICATIONS

- 8.2.1** The Council is under a statutory duty to ensure that it maintains a balanced budget and to take any remedial action as required in year.
- 8.2.2** Section 28 of the Local Government Act 2003 provides that the Council is under a statutory duty to periodically conduct a budget monitoring exercise of its expenditure and income against the budget calculations during the financial year. If the monitoring establishes that the budgetary situation has deteriorated, the Council must take such remedial action as it considers necessary to deal with any projected overspends. This could include action to reduce spending, income generation or other measures to bring budget pressures under control for the rest of the year. The Council must act reasonably and in accordance with its statutory duties and responsibilities when taking the necessary action to reduce the overspend.
- 8.2.3** In addition, the Council is required by section 151 of the Local Government Act 1972 to make arrangements for the proper administration of its financial affairs. The Council's Chief Finance Officer has established financial procedures to ensure the Council's proper financial administration. These include procedures for budgetary control. It is consistent with these arrangements for Cabinet to receive information about the revenue and capital budgets as set out in this report.
- 8.2.4** The monitoring of financial information is also a significant contributor to meeting the Council's Best Value legal duty. The Council as a best value authority "must make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness" (Section 3 Local Government Act (LGA) 1999). The Best Value Duty

applies to all functions of the Council including delivering and setting a balanced budget, providing statutory services such as adult social care and children's services and securing value for money in all spending decisions.

- 8.2.5** On 20th July 2023, the Secretary of State for Levelling Up, Housing and Communities ("the SoS") issued Directions under Section 15(5) of the LGA to the Council on the basis that the Council was failing to comply with its Best Value Duty setting out actions to be taken by the Council to comply the duty. The SoS Directions require the Council to, amongst others, continue to address the culture of poor financial management at the Authority and to continue to restore public trust and confidence in the Authority by transforming the Authority's activities, practices, and omissions to ensure that they are compatible with the best value duty. In addition, the council is required to secure as soon as practicable that all the Authority's functions are exercised in conformity with the best value duty thereby delivering improvements in services and outcomes for the people of Croydon. This report serves to ensure the Council is effectively monitoring and managing its budgetary allocations in accordance with its Best Value Duty.
- 8.2.6** The Council's budget and policy framework procedure rules (Part 4C of the Constitution) provides that the Executive may only take decisions which are in line with the Budget Framework. The financial implications comments above provide that the recommended virement is within the budgetary envelope agreed by Full Council.
- 8.2.7** Adult Social Care Discharge Fund (Revenue) Grant Determination (2023-24) sets out the levels of grant funding for each authority for the purposes specified within the Grant. In utilising the grant funding, the Council must comply with the grant conditions, including around pooling the funding into the local Better Care Fund (BCF), making plans for health and social care spend (including mental health) which are agreed by the local authorities and Integrated Care Board Chief Executives and signed off by the Health and Wellbeing Board under national condition 1 of the BCF and to building additional adult social care and community-based reablement capacity to reduce hospital discharge delays through delivering sustainable improvements to services for individuals.
- 8.2.8** The council may not use this funding to compensate for expenditure already incurred, activities for which the local authority has already earmarked or allocated expenditure, or to fund inflationary pressures nor may it use this funding for activities which do not support the primary purpose of the grant.
- 8.2.9** The Market Sustainability and Improvement Fund ('the fund') was announced at the autumn statement in November 2022. The primary purpose of the fund is to support local authorities to make tangible improvements to adult social care services in their area, in particular to build capacity and improve market sustainability.
- 8.2.10** Under section 5 of the Care Act 2014, local authorities have a duty to promote the efficient and effective operation of the market for adult care and support as a whole. The ambition of the Care Act 2014 is for local authorities to influence and drive the pace of change for their whole market, leading to a sustainable and diverse range

of care and support providers, continuously improving quality and choice and delivering better, innovative and cost-effective outcomes that promote the wellbeing of people who draw on care and support. The guidance on grant conditions makes clear that the additional funding is to go beyond meeting inflationary pressures and must deliver tangible improvements in adult social care services.

8.2.11 The Market and Sustainability Fund is a ringfenced grant and must be used to create improvements in at least one of the target areas identified within the grant. These are:

- increasing fee rates paid to adult social care providers in local areas
- increasing adult social care workforce capacity and retention
- reducing adult social care waiting times

Comments approved by Stephen Lawrence-Orumwense, Director of Legal Services and Monitoring Officer (01/09/23).

8.3 HUMAN RESOURCES IMPLICATIONS

8.3.1 There are no immediate workforce implications as a result of the content of this report, albeit there is potential for a number of the proposals to have an impact on staffing. Any mitigation on budget implications that may have direct effect on staffing will be managed in accordance with relevant human resources policies and where necessary consultation with recognised trade unions.

8.3.2 The Council is aware that many staff may also be impacted by the increase in cost of living. Many staff are also Croydon residents and may seek support from the Council including via the cost of living hub on the intranet. The Council offers support through the Employee Assistance Programme (EAP) and staff may seek help via and be signposted to the EAP, the Guardians' programme, and other appropriate sources of assistance and advice on the Council's intranet.

Comments approved by Dean Shoosmith, Chief People Officer 18/8/2023.

8.4 EQUALITIES IMPLICATIONS

8.4.1 The Council has a statutory duty to comply with the public sector equality duty set out in section 149 of the Equality Act 2010. The Council must therefore have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 8.4.2** In setting the Council's budget for 2023-2024, all savings proposals must complete an Equality Impact Assessment. As Officers deliver against the approved budget, including the savings within it, they will continue to monitor for any unanticipated equality impacts. If any impacts arise, officers will offer mitigation to minimise any unintended impact.
- 8.4.3** This report sets out a number of proposals that will change the services and provisions we provide for residents across Croydon. These proposals are subject to further work decisions.
- 8.4.4** The Council must, therefore, ensure that we have considered any equality implications. The Council has an established Equality Impact Assessment [EqIA] process, with clear guidance, templates and training for managers to use whenever new policies or services changes are being considered. This approach ensures that proposals are checked in relation to the impact on people with protected characteristics under Equality Act 2010.
- 8.4.5** Assessing the impact of proposed changes to policies, procedures, services and organisational change is not just something the law requires; it is a positive opportunity for the council to ensure it makes better decisions, based on robust evidence.
- 8.4.6** Our approach is to ensure the equality impact assessments are data led, using user information, demographic data and forecasts, as well as service specific data and national evidence to fully understand the impact of each savings proposal. This enables the Council to have proper regard to its statutory equality duties.
- 8.4.7** We have a large number of vulnerable children and asylum seekers who are in need of our services. We have also been faced with the rise of costs of the provision of adult social care, which has been exasperated following the pandemic. Alongside this our residents are dealing with the increased cost of living. We have supported residents by providing mitigation for changes where possible and signposting to other support organisations in the borough who can provide support. We will continue to seek mitigation during the equality analysis process where possible.
- 8.4.8** Our initial data suggests that residents across all equality characterises may be affected by changes. National and local data highlights that this may have a greater impact on race, disabilities, sex, pregnancy and maternity and age. We will continue to assess the impact and strive to improve our evidence and data collection, to enable us to make informed decisions.
- 8.4.9** Where consultations take place, we will ensure that we make it accessible for all characteristics including those with disabilities including neurodiversity by ensuring that we adopt Disability standards in our consultation platform. Notwithstanding

those residents who are digitally excluded. We will also consult using plain English to support our residents who do not have English as a first language.

8.4.10 With regard to potential staff redundancies, as a diverse borough we will undertake equality analysis and seek mitigation for staff by offering redeployment and employability support. We will also assess the impact of job losses on protected characteristics. We will also ensure that disabled staff are treated more favourably during restructure in that they will be required to meet the minimum standard prior to being offered an interview.

8.4.11 Research from existing EQIAs identifies that rising costs impact on some Disabled groups, communities from the Global Majority, African, Asian, African Caribbean households, young people, some people aged 15 – 64 and some people in the pregnancy/maternity characteristic. Research also indicates that there is an intersectional impact on young people from the Global Majority and both Disabled and Dual Heritage communities. Deprivation in borough is largely focused in the north and the east where the Global Majority of residents from the African, African Caribbean and Asian communities reside.

Comments approved by Naseer Ahmed for Equalities Programme Manager
21/8/2023.

9. APPENDICES

9.1 None.

10. BACKGROUND DOCUMENTS

10.1 None.

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LONDON BOROUGH OF CROYDON

REPORT:	CABINET
DATE OF DECISION	27th September 2023
REPORT TITLE:	QUARTERLY PROCUREMENT PLAN UPDATE Q2
CORPORATE DIRECTOR / DIRECTOR:	JANE WEST, CORPORATE DIRECTOR OF RESOURCES
LEAD OFFICER:	SCOTT FUNNELL, HEAD OF STRATEGIC PROCUREMENT AND GOVERNANCE Email: scott.funnell@croydon.gov.uk
LEAD MEMBER:	CLLR CUMMINGS, CABINET MEMBER FOR FINANCE
KEY DECISION?	No
CONTAINS EXEMPT INFORMATION?	No
WARDS AFFECTED:	N/A

1 SUMMARY OF REPORT

- 1.1 This report sets out the Q2 quarterly update to the Annual Procurement Plan 2023/24, with proposed additions and amends to the plan for the current year.

2 RECOMMENDATIONS

For the reasons set out in the report [and its appendices], the Executive Mayor in Cabinet is recommended:

- 2.1 to approve the Q2 update to the Annual Procurement Plan for 2023/24 as set out in Appendix A.
- 2.2 to approve the delegated decisions in the revised APP to those Lead Members or Officers as stated in Appendix A that includes the procurement strategy and award decisions, the duration of the contracts and contract values.
- 2.3 The delegated decisions shall only be exercised following recommendations from the Contracts & Commissioning Board, which include approval from both the Lead Cabinet Member and the Cabinet Member for Finance.

- 2.4** To allow for minor changes to proceed whilst retaining the agreed delegated so long as none of the following thresholds for changes are exceeded:
- i. Contract value exceeds that proposed in the APP/Quarterly Update Report, by the lesser of £500K or 25%, or the new aggregate value exceeds £1m and it becomes a key decision
 - ii. Substantial / material changes to procurement from that defined in the APP/Quarterly Update Report e.g. material risks are identified

(Should either of those thresholds be exceeded, the delegation cannot be exercised, and the decision shall be recommended to the Executive Mayor, unless a further delegation is approved. Where a delegated decision is a Key Decision to Officers, it must be made in consultation with the Lead Cabinet Member).

3 REASONS FOR RECOMMENDATIONS

- 3.1** The Improving Procurement Governance Process Cabinet paper in November 2022 set out a rationale for establishing an Annual Procurement Plan, to simplify and accelerate approvals and ensuring a more strategic deployment of resources whilst maintaining decision making rigour.
- 3.2** Managing a proactive forward plan of procurement projects is fundamental to improving compliance and to ensure that contracts are re-let in time, and the APP approach is a key element of the Council's Procurement Improvement plan.

4 BACKGROUND AND DETAILS

- 4.1** Procurement plans are subject to change throughout the duration of an Annual Procurement Plan, and so a quarterly update allows for any changes to be made and any new additions to be included.
- 4.2** Additions are either a new procurement that has been identified since the last version of the APP, whereas amendments are updates to existing APP entries.
- 4.3** For this quarterly update, there are 14 additions and 11 amendments to planned procurements with 13 additions and 6 amendments to contracts extensions and variations.
- 4.4** The reasons for the changes are included in the appendix, and the precise changes from the original APP are highlighted in yellow. The changes fall into the following categories:
- New Procurement identified
This is where Procurements to be undertaken this year have been identified since the original APP was published.

- Omission from original APP
This is where there may have been oversights whilst compiling the original APP, or new information has come to light which wasn't available at the time.
- Process Delay
This is where a procurement is still taking place, but will be later than originally planned because of delays in the process.
- Service review delayed
This is where a procurement was dependent upon the outcome of a review into the service, but this hasn't taken place yet. The procurement may or may not take place later than originally planned, but this is dependent upon the outcome of the review.
- Refined procurement approach
This is where an initial plan has been changed or updated with more up-to-date information.

4.5 There are also some unique reasons for change:

- Extra grant funding made available, vary the contract to increase the value
This is where additional grant funding has been made available to deliver a project or a scheme, and a variation needs to be made to the original contract value to include the additional spend.
- Extend until possible service replacement
This is where a third party may replace the service provision, so the Council needs to extend their provision until this position is confirmed.
- Previous tender not awarded
This is where a compliant process was undertaken but an award was not made, therefore requiring an extension to the existing contract.
- Procurement brought forward
This is where a procurement will now need to be undertaken sooner than originally planned due to a change in situation, for example a change in markets or to support a programme of works
- Change in approach
This is where an alternative approach has been decided upon, for example to re-procure instead of extend.

4.6 It is important to note that procurement intentions are indicative and subject to change. For example, it may be the Council's intention to take up a permitted contract extension before the Council has agreed this with the incumbent provider.

5 ALTERNATIVE OPTIONS CONSIDERED

- 5.1** No other options considered at this stage. The November 2022 Cabinet paper established this approach as the process for planning procurement activity and delegating procurement decisions.

6 CONSULTATION

- 6.1** Services across the Council have been consulted to ensure the accuracy of the APP updates. There is no requirement for external consultation as this is an internal process.

7. CONTRIBUTION TO COUNCIL PRIORITIES

- 7.1** The Executive Mayor's Business Plan set out a requirement to review and manage Council contracts better. A proactive forward plan of procurements enables the Council to ensure that contracts are re-procured in a timely manner which is essential to managing a programme of activity, ensuring value for money and supporting the Council priority of balancing the books.

8. IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

- 8.1.1** The amends to the Annual Procurement Plan set out in appendix A lists contracts that total £510,047,905. The existing governance processes need to be complied with to provide assurance that value for money will be delivered from these procurements.

- 8.1.2** Comments approved by Darrell Jones, Acting Head of Finance on behalf of the Corporate Director of Resources and S151 Officer (17.08.2023).

8.2 LEGAL IMPLICATIONS

- 8.2.1** The Executive Mayor has the power to exercise executive functions pursuant to s9E of the Local Government Act 2000 and has the power to delegate those functions. This report seeks relevant delegations to exercise executive functions.
- 8.2.2** In relation to any contract and procurement strategy/ award/ variation decisions that are key decisions, any delegations to officers shall be limited to "Chief Officers" as defined in the Council's Constitution, meaning: a) the Head of Paid Service; b) the Chief Finance Officer; c) the Monitoring Officer; d) a Statutory Chief Officer; e) a Non-Statutory Chief Officer. Corporate Directors fall within the definition of "Non-statutory Chief Officer", which has the same meaning as in section 2(7) the Local Government and Housing Act 1989 and includes officers who directly report to the Head of Paid Service/ Chief Executive.

8.2.3 At present the delegations in the Council's Tenders and Contracts Regulations have been superseded by the Executive Mayor's Scheme of Delegation following the introduction of the Mayoral Model.

8.2.4 Comments approved by the Head of Commercial & Property Law on behalf of the Director of Legal Services and Monitoring Officer (17.08.2023).

8.3 EQUALITIES IMPLICATIONS

8.3.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Sec 149 of the Equality Act 2010. The Council must, in the performance of its functions, therefore, have due regard to:

- a. eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
- b. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- c. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.3.2 When a service is contracted out both the contractor and the public authority that commissioned the service must give due regard to the three principles of the General Duty as set out above. Any supplier that is exercising public functions also has an obligation to fulfil the general duty.

8.3.3 The Contract Management Framework is required to work within the framework of the Equality Strategy 2020- 2024. The deliverables in the Equalities Strategy should be incorporated into the Contract Management Framework and policy documents as detailed below:

"Outline how the proposed contract(s) will comply with the Public Sector Equality Duty outlined in Section 4 of the EQIA; and meet the outcomes of the Council's equality strategy, particularly:

- i. All Council contracts contribute towards delivering our equality objectives.
- ii. Council contractors are inclusive and supportive of vulnerable groups.
- iii. Ensure that every strategy, delivery plan, council contract and staff appraisal have an equality objective linked to it.
- iv. That contractors be requested to adopt Croydon's Equality and George Floyd Race Matters Pledges".

8.3.4 The Equalities Strategy including the Pledges named above, are provided to all bidders during the tendering stage of the procurement process. Social Value objectives also mirror the Council's commitments to equalities and diversity.

8.3.5 EQIAs will be completed in respect of each contract.

8.3.6 Comment approved by Naseer Ahmed on behalf of Denise McCausland, Equalities Programme Manager (17.08.2023).

OTHER IMPLICATIONS

8.4 HUMAN RESOURCES IMPLICATIONS

8.4.1 There are no immediate Human Resources implications arising from the content of this report. Should matters arise these will be managed under the Council's HR policies and procedures.

8.4.2 Approved by: Gillian Bevan, Head of HR Resources and Assistant Chief Executives Directorates on behalf of the Chief People Officer (17.08.2023).

9. APPENDICES

9.1 Appendix A - LBC Quarterly Updated Procurement Plan Q2 2023-24

10. BACKGROUND DOCUMENTS

10.1 *Improving Procurement Governance* – November 2022 Cabinet

10.2 *LBC Annual Procurement Plan 2022/23* – March 2023 Cabinet

10.3 *LBC APP Quarterly Update* – June 2023 Cabinet

Event Name	Directorate	Procurement Intention	Total Contract Value	Contract Length (months)	Extension Period	Planned Event Date	Contract Start Date	Contract End Date	Recommended Approver for Procurement Strategy	Recommended Approver for Award / Extension	Key Decision	Reason for change
ADDITIONS TO ANNUAL PROCUREMENT PLAN (PROCUREMENTS)												
Utilities contract - Unmetered street lighting supply	Resources	Extend	£25,000,000	12	0	02/01/2024	30/09/2024	29/09/2028	CM for Finance	CD Resources	Yes	Procurement brought forward
Advocacy for Adults	ASCH	Reprocure	£2,263,631	84	n/a	01/01/2024	01/10/2024	30/09/2031	CM for Health and Adult Social Care	CD ASCH	Yes	New Procurement identified
Children's Advocacy Services	CYPE	Reprocure	£500,000	60	n/a	01/12/2023	01/08/2024	31/07/2029	CM for CYP	CD CYP	No	New Procurement identified
Floating Support for MH, LD & ASD	ASCH	New Procurement	£7,820,000	120	n/a	15/01/2024	01/10/2024	31/09/2034	CM for ASCH	CD ASCH	Yes	New Procurement identified
Croydon Direct Payments Service	ASCH	New Procurement	£2,500,000	120	n/a	31/03/2024	01/04/2025	31/03/2035	CM for ASCH	CD ASCH	Yes	New Procurement identified
Respite for Adults with LD & Autism	ASCH	New Procurement	£2,633,186	60	n/a	01/12/2023	01/08/2024	31/07/2029	CM for ASCH	CD ASCH	Yes	New Procurement
Cyclical Redecoration Contract	Housing	New Procurement	£29,000,000	60	24	01/01/2024	01/09/2024	31/08/2029	CM for Homes	CD Housing	Yes	New Procurement identified
Telecoms Consultancy Support	Housing	New Procurement	£600,000	48	12	01/01/2024	01/09/2024	31/08/2028	CM for Homes	CD Housing	no	New Procurement identified
55-133 College Green (CG2) Refurbishment and Improvement Works	Housing	New Procurement	£5,000,000	36	n/a	01/01/2024	01/09/2024	31/08/2027	CM for Homes	CD Housing	Yes	New Procurement identified
2 - 144 Gillett Road & 1 - 133 Garnet Road Blocks: Planned Maintenance and Improvement Works	Housing	New Procurement	£1,500,000	24	n/a	01/01/2024	01/10/2024	31/09/2026	CM for Homes	CD Housing	Yes	New Procurement identified
AOV's Renewal and New Installations	Housing	New Procurement	£4,000,000	24	n/a	01/01/2024	01/10/2024	31/09/2026	CM for Homes	CD Housing	Yes	New Procurement identified
CRA - Credit reference agents	Resources	New Procurement	£500,000	36	n/a	01/11/2023	31/03/2024	30/03/2027	CM for Finance	CD Resources	no	New Procurement identified
MyResources system support	Resources	Reprocure	£635,000	72	TBC	05/01/2024	01/04/2024	31/03/2030	CM for Finance	CD Resources	Yes	Procurement brought forward
Regina Road Construction	Housing	New Procurement	£130,000,000	36	n/a	01/02/2024	01/12/2024	31/11/27	Cabinet	Cabinet	Yes	New Procurement identified
AMENDMENTS TO ANNUAL PROCUREMENT PLAN (PROCUREMENTS)												
Training service provider - Strategic Delivery	ACE	New Procurement	£1,000,000	60	n/a	02/06/2023	01/10/2023	30/09/2028	n/a	CD ACE	Yes	Change in approach
Training service provider - Strategic Partner	ACE	New Procurement	£1,000,000	60	n/a	02/06/2023	01/10/2023	30/09/2028	n/a	CD ACE	Yes	Change in approach
Joint Children's Speech and Language Therapy and Occupational Therapy	CYPE	Reprocure	£19,881,554	60	0	09/10/2023	01/02/2024	31/01/2029	CM for CYP	CD CYP	Yes	Update to value due to inclusion of health funding
Supervised Contact	CYPE	Reprocure	£3,752,000	60	24	01/04/2024	01/11/2024	31/10/2029	CM for CYP	CD CYPE	Yes	Process Delay
Housing Professional Consultancy (Fire Safety)	Housing	New Procurement	£3,700,000	36	n/a	01/12/2023	01/04/2024	31/03/2027	CM for Homes	CD Housing		
Housing First	Housing	Re-procure	£510,000	48	n/a	01/04/2024	01/11/2024	30/10/2028	CM for Homes	CD Housing	No	Process delay

Supported Housing Service for Ex-Offenders	Housing	Re-procure	£525,000	48	n/a	01/04/2024	01/11/2024	31/11/2028	CM for Homes	CD Housing	No	Process delay
Regina Road Professional Service - Residual	Housing	New Procurement	£20,000,000	48	n/a	15/09/2023	01/01/2024	31/12/2027	CM for Homes	CD Housing	Yes	Refined procurment approach
Regina Road Professional Service - Architects	Housing	New Procurement	£12,000,000	48	n/a	15/09/2023	01/01/2024	31/12/2027	CM for Homes	CD Housing	Yes	Refined procurment approach
Regina Road Professional Service - Quantity Surveyor	Housing	New Procurement	£8,000,000	48	n/a	15/09/2023	01/01/2024	31/12/2027	CM for Homes	CD Housing	Yes	Refined procurment approach
Street Homelessness Outreach and Resettlement Service	Housing	Reprocure	£1,263,680	48	n/a	01/04/2024	01/11/2024	30/11/2028	Delegation already in place	Delegation already in place	Yes	Process delay
ADDITIONS TO ANNUAL PROCUREMENT PLAN (EXTENSIONS AND VARIATIONS)												
PFI Older People Residential Care Homes	ASCH	Extend & Vary	£97,500,000	5	n/a	15/09/2023	01/11/2023	31/03/2024	N/A	CD ASCH	Yes	Previous tender not awarded
Primary Care Contracts	ACE	Extend & Vary	£1,406,000	24	n/a	01/11/2023	01/12/2023	31/11/2025	N/A	CD ACE	Yes	Process delay
Health and Care Personal Assistance Support	ASCH	Extend & Vary	£622,480	16	n/a	15/10/2023	02/12/2023	31/03/2025	N/A	CD ASCH	No	Service review delayed
Supervised Contact	CYPE	Extend	£3,500,000	12	n/a	18/10/2023	01/11/2023	31/10/2024	N/A	CD CYPE	Yes	Process delay
CES Collaboration Agreement	ASCH	Extend	£47,627,329	120	n/a	31/10/2023	15/11/2023	14/11/2033	N/A	CD ASCH	Yes	New requirement identified
Section 75 Public Health Nursing	CYPE	Extend & Vary	£31,800,000	17	n/a	01/10/2023	15/10/2023	31/05/2025	N/A	CD ACE	Yes	Process delay
Passenger Transport Minibus Various Routes Lot 3	SCRER	Extend & Vary	£2,800,000	10	n/a	01/10/2023	01/11/2023	31/08/2024	N/A	CD SCRER	No	Process delay
Fast Start	CYPE	Extend & Vary	£4,856,682	12	n/a	01/11/2023	01/04/2024	31/03/2025	N/A	CD CYPE	Yes	New requirement identified
Supported Housing Service for Ex-Offenders	Housing	Extend & Vary	£700,000	12	n/a	01/11/2023	01/12/2023	30/11/2024	N/A	CD Housing	No	New requirement identified
OPS 3 Lot 1 Call of for supported living for adults with Disabilities and Autism	ASCH	Extend	£1,905,492	24	n/a	01/03/2024	10/10/2024	09/10/2026	n/a	CD ASCH	No	Omission from original APP
Information, Advice and Guidance	ACE	Extend & Vary	£1,625,000	12	n/a	01/11/2023	01/04/2024	31/03/2025	n/a	CD ACE	No	Omission from original APP
Children's Social Care Assessments	CYPE	Extend	£10,049,000		n/a	09/02/2024	01/08/2024	31/02/2027	n/a	CD CYPE	No	Omission from original APP
Audit and Anti-Fraud Framework - Contract Extension	Resources	Extend	£3,168,000	24	n/a	31/01/2024	01/04/2024	31/3/2026	n/a	CD Resources	No	Omission from original APP
AMENDMENTS TO ANNUAL PROCUREMENT PLAN (EXTENSIONS AND VARIATIONS)												
Floating Support for LD & ASD	ASCH	Extend & Vary	£3,385,354	11	n/a	15/10/2023	01/11/2023	30/09/2024	n/a	Delegation already in place - CD ASCH	Yes	Process Delay
Floating Support for MH	ASCH	Extend & Vary	£1,292,684	11	n/a	15/10/2023	01/11/2023	30/09/2024	n/a	Delegation already in place - CD ASCH	Yes	Process Delay
Croydon Drug and Alcohol Integrated Engagement, Treatment and Recovery Service	ACE	Extend & Vary	£4,925,833	17	n/a	30/09/2023	01/10/2023	31/03/2025	N/A	CD ACE	No	Process Delay
Capita One support	CYPE	Extend & Vary	£1,200,000	5	n/a	01/10/2023	01/11/2023	31/03/2024	n/a	CD CYPE	No	Process delay
Street Homelessness Outreach and Resettlement Service	Housing	Extend & Vary	£1,300,000	12	n/a	01/11/2023	01/12/2023	30/11/2024	N/A	CD Housing	Yes	Process delay
End User Services	ACE	Extend & Vary	£6,800,000	12	n/a	01/11/2023	16/03/2024	15/03/2025	n/a	CD ACE	Yes	Process delay

LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	27 September 2023	
REPORT TITLE:	Oracle Improvement Programme	
CORPORATE DIRECTOR / DIRECTOR:	Jane West, Corporate Director of Resources (S151 Officer)	
LEAD OFFICER:	Jane West, Corporate Director of Resources (S151 Officer) jane.west@croydon.gov.uk	
LEAD MEMBER:	Cllr Jason Cummings, Cabinet Member for Finance	
KEY DECISION?	No	
CONTAINS EXEMPT INFORMATION?	No	Public
WARDS AFFECTED:	All	

1 SUMMARY OF REPORT

- 1.1** This report recommends an investment of £740,000, from the Transformation Plan revenue budget allocation 2023/24, into developing a detailed implementation plan and full resource request to significantly improve the Council’s Oracle Cloud solution for Finance, Procurement, HR, and Payroll while ensuring the system’s stability and continuity. This is in addition to £175,000 project investment request already approved by the Transformation Board and reported elsewhere on this agenda within the Transformation Plan update report.
- 1.2** The improvement programme which this investment supports is required to enable the transformation ambitions of the Council and support the priorities in the Mayor’s Business Plan 2022-2026 as detailed below.

2 RECOMMENDATIONS

For the reasons set out in the report, the Executive Mayor in Cabinet, is recommended to approve the recommendations below:

- 2.1** To allocate an investment of £740,000 from the Transformation Plan revenue budget 2023/24 to provide resources to develop a detailed plan with workstreams, milestones and costs to implement the improvements to the Council’s Oracle system as set out in this report.

3 REASONS FOR RECOMMENDATIONS

- 3.1** To provide the Council with the confidence that it has a robust Oracle platform for Finance, HR, Payroll and Procurement systems that reflects best practice and enables further council transformation.
- 3.2** To improve the user experience of Oracle by promoting greater self-service functionality for line managers, budget managers and promote simplification and exploit the automation of processes.

4 BACKGROUND AND DETAILS

- 4.1** One of the most critical IT systems used across the organisation is the Oracle Enterprise Resource Planning (ERP) application. This is a suite of inter-dependant modules that provides the operational backbone for the council. These modules cover finance, HR, procurement, and supply chain operations. This system enables the payment of staff and suppliers, the collection of income and management of the Council's finances and employees.
- 4.2** The platform used is Oracle's Cloud Fusion product (referred to as My Resources within Croydon). In addition to a contract with Oracle for licences to use their Fusion product, Croydon partnered with Evolutionary Systems Ltd (Evosys, now Mastek) to implement the system and provide ongoing support. The My Resources solution went live in May 2019 replacing several disparate systems.
- 4.3** Post go-live little investment has been made to further develop the system and it is now, in its current configuration, holding back further changes to back-office services and the wider transformation of council.
- 4.4** There are numerous complaints about limited reporting capability and too much off system work taking place such as manual work arounds, separate reporting and off-system data manipulation. This results in significant additional manual effort in many services and introduces control issues and risk into reporting and governance.

Oracle Review

- 4.5** An officer board has been established, chaired by the Corporate Director of Resources and S151 Officer. During April and May this year the board commissioned Oracle to undertake a review of the My Resources system to understand where improvements can be made to align the system with Oracle best-practice and ensure the Council maximises the benefits it can achieve from its investment. The review involved over 70 key partners across the council with over 12 workshops held.
- 4.6** The review measured the council's systems process maturity against four levels:
 - 4.6.1 Stage 1: Marginal
 - 4.6.2 Stage 2: Stable

4.6.3 Stage 3: Best Practice

4.6.4 Stage 4: Transformational

- 4.7** Regarding the HR processes they assessed at Stage 1 maturity and are characterised by several off-system activities and functionality gaps with consequent human-intensive effort.
- 4.8** In Finance the majority of the processes they assessed at Stage 2 maturity with the major problems highlighted pertaining to establishment data sync issues and a lack of automation in collections.
- 4.9** Procurement was assessed as consistently at maturity level 2 but with key issues highlighted on supplier set up and user compliance.
- 4.10** Oracle conclude that it should be realistic to aim for a best practice level of maturity and identified illustrative, best practice process changes, ranging from quick wins using reporting and functionality already in place to utilising functionality we have available but not deployed or where we have potential configuration/process design issues.
- 4.11** The officer board has agreed to move forward with developing ten key projects to address the Oracle report findings. The processes are listed in Table 1 below in a provisional priority order. There will also be dependencies between processes which will need to be picked up as part of the detailed planning; such as the Recruitment and Establishment processes needing to be aligned, similarly Planning and Budgeting will need to align with changes to the establishment process. A consistent theme across all processes will be improving governance, accountability, control, and transparency and will involve a significant culture change across all business users.

Table 1: Provisional Priorities

Priority	Process	Benefit Expected
1	Establishment - including starters movers and leavers	<ul style="list-style-type: none">• Self-service automation and easy navigation• Accurate timely reporting• Reduce failure demand, and repetitive requests.• Budget and establishment always reconciled.• Avoidance of payroll errors
2	Planning & budgeting	<ul style="list-style-type: none">• Self-service automation and easy navigation• Accurate timely reporting and transaction drill-down• Narrative reporting captured in Oracle
3	Recruitment	<ul style="list-style-type: none">• Self-service automation and much-improved applicant and hiring manager experience.• Accurate timely reporting, including EDI candidate data: on application, shortlisting, interview and appointment
4	Core HR	<ul style="list-style-type: none">• Succession Planning• Performance Management• Self-service automation and easy navigation• Better decisions and efficiency (accurate timely reporting)

Priority	Process	Benefit Expected
5	Talent management	<ul style="list-style-type: none"> • Self-service automation and easy navigation • Strategic planning • Accurate timely reporting • Talent reviews and learning journeys • Multi-platform functionality • Efficient and effective learning management system • Support development skills and careers pathways
6	Procurement	<ul style="list-style-type: none"> • Self-service automation • Better decisions • PO flipping on Portal (automatic invoice generation) • Efficient invoice management
7	Receivables and collections	<ul style="list-style-type: none"> • Paperless direct debits • Pay back dated invoices. • Invoices electronic with useful information • Self-service automation and easy navigation • Customer portal; SMS for dunning
8	Time recording & payroll	<ul style="list-style-type: none"> • Employee and manager self-service automation and easy navigation • Better decisions (accurate timely reporting) • Better controls to prevent payroll errors. • Efficiency and cost reductions
9	Sourcing & contract management	<ul style="list-style-type: none"> • Self-service automation • Better decisions • Automated interfaces Improved supplier management
10	Expenses - including Purchase Cards	<ul style="list-style-type: none"> • Self-service automation and easy navigation • Better decisions (accurate timely reporting) • Data validation at time of entry • Resubmission revisions by anyone in audit

4.12 Implementing these vital changes will be a multi-year project and is likely to cost anywhere from £2m to £5m. It is essential that the plans are properly constructed and in sufficient detail, are fully costed and proper engagement is undertaken with business process owners to ensure buy-in. This report is requesting an initial upfront investment to undertake this planning and put in place a core resource complement through to March 2024. By then a fully worked up plan and cost will come to Cabinet for consideration. This request could be agreed by the Transformation Board but given the scale of investment needed for the full project and its importance, it is considered important to bring this to the Mayor and Cabinet now, as will future programme updates.

Six Month Resource Plan

4.13 The following tables set out the resource plan through to March 2024. The resources for the initial period are funded from the £175,000 previously agreed by the Transformation Board to establish essential project management and independent consultant (critical friend) resources for this project. Table 2 sets out the resource phasing and Table 3 sets out the roles required and their key responsibilities. The

additional resources required have been costed through to March 2024 at £740,000 which includes £50,000 for third-party configuration work. The total committed to developing the costed plan for this programme will be £915,000. This is recognised to be a significant investment at this stage but is essential to de-risk the full improvement programme.

Table 2: Resources required

Resource	FTE	Sept	Oct	Nov	Dec	Jan	Feb	Mar
Programme Manager	1.0							
Change Manager	1.0							
Independent Consultant (Critical Friend)	0.4							
Workstream Lead Finance	1.0							
Workstream Lead HR (HR Core+ Establishment)	1.0							
Workstream Lead HR (Recruitment)	1.0							
Workstream Lead Procurement	1.0							
Finance Business Analyst	1.0							
HR Business Analyst	1.0							
HR Business Analyst	1.0							
Project Management Office Support	1.0							
Total	10.4							

Table 3: Key responsibilities

Role	Key Responsibilities
Programme Manager	<ul style="list-style-type: none"> Communicates and engages with senior partners and builds buy-in and support within the business community to drive the programme forward. Overall responsibility for the delivery of the programme and achievement of target business outcomes. Manages the overall programme plan, risk and issues to ensure accuracy and alignment with workstreams and dependencies are managed. Establishes a collaborative programme working environment, ensuring all team members (including suppliers) can operate effectively and deliver their obligations.
Change Manager	<ul style="list-style-type: none"> Engagement with partner groups to ensure they are listened to and the impact on their work is understood. The planning and implementation of the change including the impact on business processes. Provide input, document requirements, and support the design and delivery of training.
Independent Consultant (Critical Friend)	<ul style="list-style-type: none"> Providing project and programme assurance including advice on aligning Oracle best-practice in a local authority context. Advise on improvements and critically review solutions. Contribute lessons learned from other local authority projects.

Role	Key Responsibilities
Workstream Lead Finance	<ul style="list-style-type: none"> • Facilitating workshops to gather requirements ascertain most appropriate Oracle solution to support the Croydon budgeting and forecasting process. • Engage and manage partners to build buy-in and support within the finance and business community to drive the improvement project forward. • Determine key finance establishment processes and ensure these are reflected in the Oracle solution as well as “joining up” with the relevant HR establishment processes.
Workstream Lead HR (HR Core+ Establishment)	<ul style="list-style-type: none"> • Facilitating workshops to ascertain most appropriate Oracle solution to support the Croydon core HR and HR establishment processes. • Engage and manage partners to build buy-in and support within HR and the wider business community to drive the improvement project forward. • Lead improvement of establishment processes and ensure these are reflected in the Oracle solution as well as “joining up” with the other relevant organisation processes e.g. starters, movers & leavers and establishment finance processes.
Workstream Lead HR (Recruitment)	<ul style="list-style-type: none"> • Facilitating workshops to ascertain most appropriate Oracle solution to support the Croydon HR recruitment processes. • Engage and manage partners to build buy-in and support within HR and the wider business community to drive the improvement project forward. • Determine key HR recruitment processes and ensure these are reflected in the Oracle solution as well as “joining up” with the relevant HR establishment processes.
Workstream Lead Procurement	<ul style="list-style-type: none"> • Facilitating workshops to ascertain most appropriate Oracle solution to support the Croydon procurement processes. • Engage and manage partners to build buy-in and support within procurement and the wider business community to drive the improvement project forward. • Determine key procurement processes and ensure these are reflected in the Oracle solution as well as “joining up” with other procurement systems along with working with other workstream leads to develop end-to-end processes.
Finance Business Analyst	<ul style="list-style-type: none"> • Assist in the analysis and evaluation of existing business processes a company has and identifying areas of improvement
HR Business Analyst (x 2)	<ul style="list-style-type: none"> • Assist in the analysis and evaluation of existing business processes a company has and identifying areas of improvement
PMO support	<ul style="list-style-type: none"> • Support the project team by maintaining a governance structure and associated activities such as ongoing risk assessments and mitigation across all workstreams, capturing actions and minutes as steering board meetings. • Provide management reporting support such as status of milestones and deliverables across the programme, financial information about the budget, forecast, actuals. • Reporting on project risks and progress on mitigating these risks.

5 ALTERNATIVE OPTIONS CONSIDERED

- 5.1 A discussion paper was presented to the Corporate Management Team in November 2021 outlining the plans for the My Resources (Oracle Fusion) system. There was unanimous approval to continue to leverage the Oracle Fusion platform rather than undertake a costly and distracting re-tendering exercise to replace it and implement an alternative system.
- 5.2 Also considered was operating with no further investment in Oracle Cloud and to work within the constraints of the current system footprint. This was considered as suboptimal as it would hinder further service improvements and is impractical given the Oracle Cloud system as a modern cloud application is constantly evolving and will always require development.

6 CONSULTATION

- 6.1 Engagement has been undertaken with HR and Payroll, Finance and Procurement business owners both separately and via several workshops facilitated by Oracle. The workshops were well attended with more than 70 partners from inside the council attending 12 workshops, cumulating in more than 20 hours of discussion.
- 6.2 This level consultation and engagement has meant that there is a comprehensive view of the requirements and ambitions of Croydon to not only improve business processes but also adopt improved cultures and behaviours.

7. CONTRIBUTION TO COUNCIL PRIORITIES

- 7.1 This programme of work directly contributes to the following outcome and supporting priorities in the Mayor's Business Plan 2022-2026:
- 7.1.1 **Outcome 1** - The council balances its books, listens to residents, and delivers good sustainable services.
- 7.1.2 **Priority:** Get a grip on the finances and make the Council financially sustainable.
Priority: Ensure good governance is embedded and adopt best practice.
Priority: Develop our workforce to deliver in a manner that respects the diversity of our communities.

8. IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

- 8.1.1 The £740,000 resource request will be funded from the £10m transformation plan budget agreed by Council for 2023-24. Noting that the Transformation Board has previously agreed £175,000 for project resources for this project. Therefore, the

total commitment at this stage amounts to £915,000. Given the scale of the likely full project cost, a funding source for the full project will need to be identified when that request is made of the Executive Mayor in Cabinet.

Comments approved by Allister Bannin, Director of Finance (Deputy S151 Officer)
(14/08/2023)

8.2 LEGAL IMPLICATIONS

8.2.1 The Council as a best value authority “must make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness” (Section 3 Local Government Act (LGA) 1999). The Best Value Duty applies to all functions of the Council.

8.2.2 The Council is the subject of Directions from the Secretary of State requiring service transformation and improvements. The recommended funding allocation serves to improve the Council’s IT infrastructure, enables service transformation, and aligns with the Council’s best value duty.

8.2.3 The Council's budget and policy framework procedure rules (Part 4C of the Constitution) provides that the Executive may only take decisions which are in line with the Budget Framework. The recommended funding allocation is within budgetary envelop approved by Full Council.

Comments approved by the Director of Legal Services and Monitoring Officer. (Date 19/09/2023)

8.3 EQUALITIES IMPLICATIONS

8.3.1 Under the Public Sector Equality Duty of the Equality Act 2010, decision makers must evidence consideration of any potential impacts of proposals on groups who share the protected characteristics, before decisions are taken. This includes any decisions relating to how authorities act as employers; how they develop, evaluate and review policies; how they design, deliver and evaluate services, and also how they commission and procure services from others.

8.3.2 Section 149 of the Act requires public bodies to have due regard to the need to:

Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act.

Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and

Foster good relations between people who share a protected characteristic and people who do not share it.

8.3.3 There are no direct Equalities implications of this decision. However, if the planned improvements go ahead there is expected to be a positive benefit as enhancements will be made to reporting on equalities and diversity information as referenced in Table 1. As part of that process an equality impact assessment will be completed.

Comments approved by Naseer Ahmad on behalf of the Equalities Manager (Date 21/08/2023)

APPENDICES

N/A

BACKGROUND DOCUMENTS

N/A

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LONDON BOROUGH OF CROYDON

REPORT:	CABINET	
DATE OF DECISION	27th September 2023	
REPORT TITLE:	Future of Croydon Affordable Homes	
CORPORATE DIRECTOR and LEAD OFFICER	Jane West – Corporate Director of Resources and S151 Officer	
LEAD MEMBER:	Mayor Jason Perry – Executive Mayor Cllr Jason Cummings – Lead Member for Finance	
DECISION TAKER:	Executive Mayor in Cabinet	
KEY DECISION?	Yes	Key Decision 6223EM – Decision incurs expenditure, or makes savings, of more than £1,000,000 or such smaller sum which the decision-taker considers is significant having regard to the Council’s budget for the service or function to which the decision relates
CONTAINS EXEMPT INFORMATION?	No	N/A
WARDS AFFECTED:	All	

1 Summary of Report

- 1.1 This report updates Cabinet on operations and performance of both active Limited Liability Partnership Companies (LLP Companies), Croydon Affordable Homes LLP and Croydon Affordable Tenures LLP.
- 1.2 This report also provides updates to changes being made to operational arrangements including the Council’s relationship with the Limited Liability Partnership (LLP) Board. The update to the arrangements reflects an approach that was envisaged during the setup of the LLP Companies but was not fully implemented. With necessary adjustments now being made to the Council’s draft 2019/20 Financial Accounts the Council can proceed with formalising engagement between the Council and the LLP Companies.

2 Recommendations

For the reasons set out in the report the Executive Mayor in Cabinet is recommended:

- 2.1 to note the update on operations and performance of Croydon Affordable Homes LLP and Croydon Affordable Tenures LLP

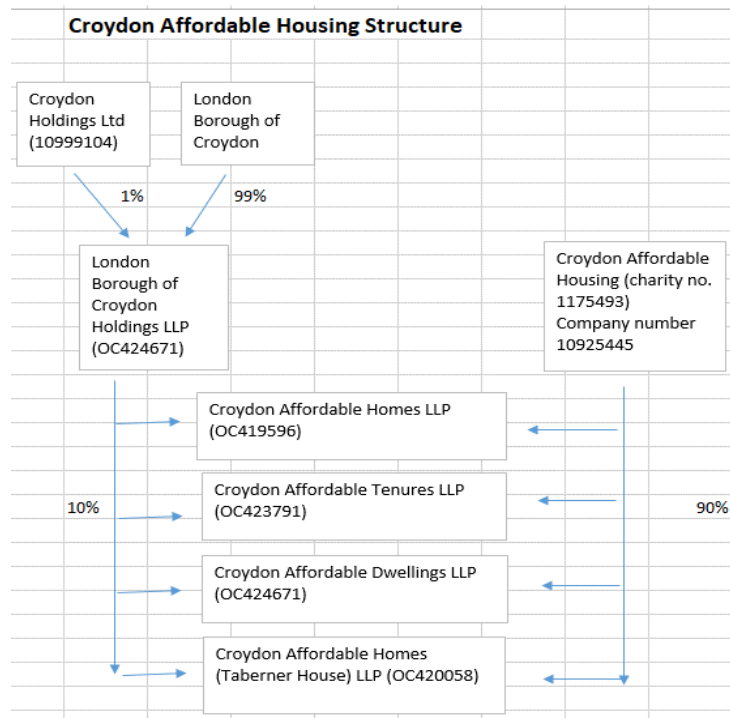
- 2.2 to note the changes to working arrangements between the Council and the LLP companies.
- 2.3 to delegate to Corporate Director of Resources and S151 Officer, in consultation with Cabinet Member of Finance and Croydon Companies Supervision and Monitoring Panel (CCSMP) to vary agreements between the Council and the LLP Companies.

3 Reasons for Recommendations

- 3.1 Formalising of arrangements between the Council and LLP Companies will result in changes to the agreements between the two entities and no previous delegation has been made to make variations.
- 3.2 The recommendations requesting Cabinet to note matters reflects the latest update to arrangements to legacy accounting issues and implications of the performance of the LLP companies to the Council.

4 Background and Details

- 4.1 Cabinet received an update in May 2023 on the LLP Companies as part of the Croydon Council Companies (excluding Brick by Brick Croydon Ltd) Update Report. This report advised Cabinet of performance issues particularly in relation to arrears.
- 4.2 In addition, the report in May 2023 also advised Cabinet on work being done between the Council and its external Auditors (Grant Thornton) to correct the accounting treatment of CAH/CAT in the Council's financial accounts. Further detail was also provided within the last two Budget Setting reports presented to Cabinet and Full Council during March 2022 and March 2023. This report provides an update to the work done and latest position in relation to the status of the audit.
- 4.3 Significant administrative time by Council Officers' have been allocated to resolving matters related to the LLP Companies. Further changes identified in this report will ensure that less Council Staff time is needed and that the LLP Board have the necessary autonomy to focus on managing for the LLP Companies.
- 4.4 The Council approved the setting up of the LLP structure in 2017 via the Delivery of Affordable Housing report presented to the June 2017 Cabinet. The LLP companies were subsequently set up and became operational over financial years 2017/18 to 2019/20. The only active LLPs are Croydon Affordable Homes LLP and Croydon Affordable Tenures LLP, with other LLPs remaining dormant. The Council, via London Borough of Croydon LLP holds a 10% equity stake in the LLP Companies and the Charity, Croydon Affordable Housing, holds the remaining 90% equity stake. The ownership structure is presented below.



- 4.5** The LLPs support the Council through provision of 344 residential units for the Homelessness service, where the Council holds 100% nomination rights to the units for a period of 40 years from inception of the arrangement. It is therefore important that the LLPs remain successful in their operations whilst ensuring the Council achieves the best value from being a key stakeholder.
- 4.6** The Council has invested significant resources to support the LLPs and that investment is now establishing a sustainable structure with minimal Council input. The Council and the LLPs have five property agreements between them and these will need to be varied as explained in Section 6 below to ensure that the operations within the LLP companies and the Council are in line with best practice with clear separation of duties.

Accounting corrections for transactions with LLP Companies

- 4.7** The Council has now made all necessary updates to its 2019/20 Year End Accounts to reflect accounting entries that reflect accounting substance over legal form in relation to the initial transactions with the LLP Companies. An updated set of 2019/20 accounts were posted on the Council’s website in July 2023 and these are now with the Council’s external auditors. The updates include showing the assets (properties) and liabilities (loans from Canada Life and Legal & General) on the Council’s balance sheet.
- 4.8** The accounting update has resulted in a net charge of £73.078m to the Council’s Income and Expenditure account, as the removal of the capital receipt to the Council from the LLP structures prevented revenue transformation expenditure being funded from capital by the Council. This cost pressure was resolved by the application of a capitalisation direction into the 2019/20 accounts, which increased the Council’s Capital Financing Requirement (CFR) by the same amount. This capitalisation direction does however incur additional Minimum Revenue Provision (MRP) charges

for its repayment over the subsequent 20 years. At the point the 2019/20 accounts were re-presented, this MRP charge totalled £3.544m, which was also funded by Capitalisation Direction. The repayment of this Capitalisation Direction via MRP was included within the 2023/24 Budget Setting report and therefore will not result in any new additional costs to the Council.

- 4.9** At the time of writing this report the Council's external auditors have not concluded their audit of the 2019-20 accounts which will include the changes explained in paragraph 5.2 above.

Operational Updates between the Council and LLP Companies

- 4.10** The accounting implications have revealed a few operational improvements that can be made and ones which will ensure clear roles and responsibilities for both entities. Currently, the Council provides financial and property services which includes cash management, property management and bookkeeping services. The LLP Companies procure external accounting services from Azets Accountants but largely have been relying on the Council to provide other services.
- 4.11** This has caused a number of operational inefficiencies due to the differing rules and regulations impacting both the Council and LLP Companies. The Council is obliged to ensure all procurement and payment matters adhere to its constitutional position and also correctly follows finance and procurement regulations. However, the LLP Companies require to operate in a similar manner to private entities where the requirements to appoint and work with third party suppliers is a lot more flexible.
- 4.12** As various matters proceed via the Council this creates delay in completing matters and results in financial costs to the LLP. For example, resolution of disrepair claims requires efficient and timely legal action as the longer a claim is held the greater the risk of non-payment of rent.
- 4.13** In order to ensure the LLP Companies, operate in a commercially viable manner, the Board of the Companies agreed to transfer the cash management and bookkeeping services back into the LLP Companies. A new Finance Officer will be recruited by the LLP Companies who will provide focused support and will work closely with the Council on property management matters.
- 4.14** In addition, at the time of writing this report the LLP Companies are now in the process of opening their own bank accounts, which will help with procuring new suppliers directly and having the mechanism to pay under their own bank accounts.
- 4.15** The Property Management agreement will remain with the Council as the LLP Companies do not have the full infrastructure at present, which would include IT systems and staffing resource to manage the tenancies and the assets. The Council's NEC system is an established software, which currently has a repairs and tenancy

management function, and the Council can leverage its scale to continue to provide property and tenancy services.

- 4.16** Having an improved financial management arrangement will ensure the LLPs are able to build a direct and efficient relationship with the suppliers and the Council. The aim is that the Council's Property management lead will work closely with the finance lead and ensure a more formal arrangement can be implemented.
- 4.17** Through these changes the LLP Companies will take on more responsibilities in managing their own day to day arrangements and retain the necessary control as required for independent companies. This approach will require the LLPs to have sufficient cash to cover costs of the finance lead and to ensure it can pay suppliers in a timely manner. Currently, a recharge is made by the Council to the LLP Companies for provision of financial support. As part of the change in arrangements the LLPs will simply divert the recharge payment from the Council to paying for staff within the LLP.
- 4.18** As the processes and relationships are formalised with clearer roles and responsibilities identified, the Headlease agreement, Cash Management agreement and the Property Management agreement may need to be varied to reflect the revised relationship between the Council and LLP Companies.
- 4.19** The Headlease Agreement will need to be varied to reflect the need for the LLP Companies to deduct from the rent calculation charges related to lifecycle and other general business provisions. The Council currently holds provision for lifecycle costs and other provisions within its own balance sheet, however this is not in line with proper accounting practices as the provisions should remain on the LLPs balance sheet.
- 4.20** The Council is currently holding £1.50m in lifecycle and other provisions money that belongs to the LLP Companies. A full property condition survey is being proposed by the LLP Companies, which will be used to assess the net requirement to carry out necessary refurbishment to bring the residential units to a decent standard.

5 Alternative Options Considered

- 5.1** There are no alternative options as this paper updates the Cabinet on current arrangements with Croydon Affordable Homes structure and requests that further improvements be made to ensure clear roles and responsibilities are identified for the Council.
- 5.2** Not proceeding with these updates would simply cause further operational inefficiencies and impact on the financial position of the LLP Companies. This risks both the Council and the LLP Companies failing on their compliance and accounting responsibilities.

6 Consultation

- 6.1** The proposal presented in this report has been discussed and agreed with the Board of both LLP Companies. Approval was sought from the LLP Boards during the June and July 2023 Board meetings.
- 6.2** The Council has also engaged with the LLP's accountants Azets, to ensure corrections to the LLP accounts are made in line with that explained under Section 5 of this report. Azets have now completed the adjustments and the changes to the accounts will be presented to the September LLP Board meetings.
- 6.3** The Croydon Companies' Supervision and Monitoring Panel (CCSMP) has also been a key driver in considering improvements relevant to these proposals as a result of its role in monitoring the performance of the LLPs.

7 Implications

7.1 FINANCIAL IMPLICATIONS

- 7.1.1** This report requests delegation to vary agreements between the Council and the LLP Companies to reduce operational process inefficiencies and clarify roles and responsibilities of the parties.
- 7.1.2** These arrangements will not materially impact the Council's financial position, however as the accounting services will be transferred into the LLP Companies the Council will not receive any income for the financial management services previously provided. In return, the Council's finance staff previously supporting the LLP Companies will focus on Council requirements.

Comments approved by Allister Bannin, Director of Finance (Deputy S151). 11/08/23

7.2 LEGAL IMPLICATIONS

- 7.2.1** The Council has a 10% interest in Croydon Affordable Homes LLP and Croydon Affordable Tenures LLP (the 'LLPs') via the London Borough of Croydon Holdings LLP (the 'Holding LLP') alongside Croydon Holdings Ltd, a company solely owned by the Council (the 'Holding Company'). These arrangements are detailed within paragraph 4.3 of this report, and the Council has a direct relationship with the LLPs under various agreements, as detailed in this report.

- 7.2.2** In respect of the delegation recommendation 3 set out in this report, the Executive Mayor has the power to exercise executive functions pursuant to s9E of the Local Government Act 2000 and has the power to delegate those functions.
- 7.2.3** When making delegated decisions to vary agreements between the Council and the LLPs, the Council will need to consider its responsibilities as a party to those agreements and its interest as Shareholder/ Member of the LLPs, Holding LLP and Holding Company. It is important to separate what is in the interests of the LLPs, Holding LLP and Holding Company from what is in the interests of the Council. Fundamentally, decisions need to be made solely having regard to what is in the interests of the Council (allowing for the fact that the interests of the LLPs, Holding LLP and Holding Company are intertwined with each other and with the Council).
- 7.2.4** The proposed variations to agreements will also require independent decisions of the LLPs, which may require Director and/or Shareholder/ Member decisions. The LLPs will follow their own decision-making processes in that regard and, if required, the Council's power to make decisions as a Shareholder/Member of the LLPs via the Holding Company/ Holding LLP may be exercised pursuant to the general power under Section 1 of the Localism Act 2011.
- 7.2.5** Legal implications will also need to be considered as part of any delegated decision on variations to agreements.
- 7.2.6** The recommendations in this report updating Cabinet on the position of, are to note only.

Comments approved by the Head of Legal – Kiri Bailey on behalf of the Director of Legal Services and Monitoring Officer 17.08.23

7.3 EQUALITIES IMPLICATIONS

- 7.3.1** The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Sec 149 of the Equality Act 2010. The Council must, in the performance of its functions, therefore, have due regard to:
- a. eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
 - b. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
 - c. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

7.3.2 When a service is contracted out both the contractor and the public authority that commissioned the service must give due regard to the three principles of the General Duty as set out above. Any supplier that is exercising public functions also has an obligation to fulfil the general duty.

7.3.3 The Contract Management Framework is required to work within the framework of the Equality Strategy 2020- 2024. The deliverables in the Equalities Strategy should be incorporated into the Contract Management Framework and policy documents as detailed below:

“Outline how the proposed contract(s) will comply with the Public Sector Equality Duty outlined in Section 4 of the EQIA; and meet the outcomes of the Council’s equality strategy, particularly:

- i. All Council contracts contribute towards delivering our equality objectives.
- ii. Council contractors are inclusive and supportive of vulnerable groups.
- iii. Ensure that every strategy, delivery plan, council contract and staff appraisal have an equality objective linked to it.
- iv. That contractors be requested to adopt Croydon’s Equality and George Floyd Race Matters Pledges”.

7.3.4 The Equalities Strategy including the Pledges named above, are provided to all bidders during the tendering stage of the procurement process. Social Value objectives also mirror the Council’s commitments to equalities and diversity.

7.3.5 At the delivery stage of this service, the provider is required to collect diversity of service user and update the EQIA.

Comments approved by Denise McCausland - Equalities Manager (Date 07/08/2023)

8 APPENDICES

N/A

9 BACKGROUND DOCUMENTS

Croydon Council Companies (excluding Brick by Brick Croydon Ltd) Update Report – **May Cabinet 2023**

Revenue Budget and Council Tax Levels 2023/24 – **February 2023**

General Fund & Housing Revenue Account Budget 2022/23 to 2024/25 – **February 2022**

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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