

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	PLACE
Title of proposed change	Local Implementation Plan – Annual Spending Submission 2020/21
Name of Officer carrying out Equality Analysis	Ben Kennedy – Strategic Transport Manager

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

The Annual Spending Submission of local transport schemes has to be sent to TfL each year to release Local Implementation Plan (LIP) funding. This submission forms part of the three year programme of investment that was approved as a key decision in February 2019 when Croydon's Local Implementation Plan 3 (LIP3) was submitted to the Mayor of London for approval in March 2019. The funding is provided by TfL to support delivery of schemes to ensure the borough meets the objectives and targets set in the Mayor's Transport Strategy ("MTS"). The LIP3 included a three year programme of investment of schemes that the council intended to deliver in order to meet the Mayor of London's transport outcomes. The LIP3 document was approved by the Mayor of London in March 2019 however we are still required to submit an Annual Spending Submission in advance of each new financial year. The Annual Spending Submission is a key element in delivering the MTS priorities – Vision Zero, improving air quality, increasing sustainable mode share and traffic reduction.

There are no significant changes to the programme from what was submitted at the LIP3 approval stage at February 2019 Cabinet.

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	Improved accessibility to public transport & public realm & pedestrian crossings, cycle lanes, electric vehicles, improved air quality,	None	

	reduced congestions, slower vehicle speeds, safer roads, more active travel and healthier streets.		
Disability	Improved accessibility to public transport & public realm & pedestrian crossings, cycle lanes, electric vehicles, improved air quality, reduced congestions, slower vehicle speeds, safer roads, more active travel and healthier streets.	Measures to support the increase in cycling in the borough such as segregated cycle lanes and dockless bike hire can have a negative impact on blind, partially sighted or wheelchair users.	
Gender	Improved accessibility to public transport & public realm & pedestrian crossings, cycle lanes, electric vehicles, improved air quality, reduced congestions, slower vehicle speeds, safer roads, more active travel and healthier streets.	None	
Gender Reassignment	Improved accessibility to public transport & public realm & pedestrian crossings, cycle lanes, electric vehicles, improved air quality, reduced congestions, slower vehicle speeds, safer roads, more active travel and healthier streets.	None	
Marriage or Civil Partnership	Improved accessibility to public transport & public realm & pedestrian crossings, cycle lanes, electric vehicles, improved air quality, reduced congestions, slower vehicle speeds, safer roads, more active travel and healthier streets.	None	
Religion or belief	Improved accessibility to public transport & public realm & pedestrian crossings, cycle lanes, electric vehicles, improved air quality, reduced congestions, slower vehicle speeds, safer roads, more active travel and healthier streets.	None	
Race	Improved accessibility to public transport & public realm & pedestrian crossings, cycle lanes, electric vehicles, improved air quality, reduced congestions, slower vehicle speeds, safer roads, more active travel and healthier streets.	None	

Sexual Orientation	Improved accessibility to public transport & public realm & pedestrian crossings, cycle lanes, electric vehicles, improved air quality, reduced congestions, slower vehicle speeds, safer roads, more active travel and healthier streets.	None	
Pregnancy or Maternity	Improved accessibility to public transport & public realm & pedestrian crossings, cycle lanes, electric vehicles, improved air quality, reduced congestions, slower vehicle speeds, safer roads, more active travel and healthier streets.	None	

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
1,000 consultation responses from the LIP3 reported in February Cabinet Report.	https://www.croydon.gov.uk/sites/default/files/Croydon_Third_Local_Implementation_Plan.pdf	

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

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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	1	1	1
Disability	2	2	4
Gender	1	1	1
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	1	1	1
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	1	1	1

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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	Cycling interventions such as segregated cycle lanes and dockless bikes may cause trip hazards for blind or partially sighted persons	Any proposed schemes would be designed in accordance with the London Cycle Design Standards and there would be separate engagement and consultation with mobility groups prior to design & implementation with an individual EA	Ben Kennedy	April 2020

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		undertaken for each specific scheme before delivery commences.		
Race	Na			
Sex (gender)	Na			
Gender reassignment	Na			
Sexual orientation	Na			
Age	Na			
Religion or belief				
Pregnancy or maternity				
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. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.	
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	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	

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	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 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: Date:	

7. Sign-Off

Officers that must approve this decision		
Equalities Lead	Name: Yvonne Okiyo Position: Equalities Manager	Date: 29.08.19
Director	Name:  Position: Heather Cheesbrough	Date: 30.08.19