

# 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**

<b>Directorate</b>	<b>Gateway, Strategy and Engagement</b>
<b>Title of proposed change</b>	<b>Policy for allocating council community properties, setting the rents in those properties and providing rent subsidy and discretionary rate relief (DRR) to voluntary and community organisations</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>John Montes</b>

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

The Council gives the voluntary and community sector (VCS) premises related support worth more than £0.5m a year. However, often this support is given to organisations already in receipt of it, with no clear criteria and no assessment of the community benefit provided by the organisations. The Council intends to keep support at the current level but focus it more effectively. The purpose of the new policy is therefore to:

- Focus premises related support on voluntary and community sector (VCS) organisations with the greatest community impact and need: organisations that support VCS Strategy priority outcomes, organisations operating in areas of the greatest deprivation, organisations that use their properties as intensively as is practicable, including sharing with other VCS organisations, and organisations with the greatest financial need.
- Provide transparency on how rents are charged, rent subsidy and discretionary rate relief are offered and how council community properties are allocated through having clear, written policies.
- Spread the benefit of the funding as widely as possible, offering opportunity to organisations that have not received funding to date, while operating within the Council’s budgetary constraints.
- Focus rent subsidy on organisations occupying council community properties and properties leased by the Council and sublet to VCS organisations during phase 1 (2021-2024). This transitional phase will subject existing recipients of rent subsidy to the new policy’s criteria; allow VCS organisations currently paying peppercorn rents to adjust to new market rents and apply for subsidy under the new rent subsidy policy if they are eligible; and enable other organisations currently paying unsubsidized rent for council properties to apply for assistance for the first time, without opening up the rent subsidy budget to wider demand. Subject to a review of the operation of this policy, VCS organisations renting premises from private landlords will be able to apply for rent subsidy from 2024/25.

### 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>There is a potential positive impact across all protected characteristics, given that the policy may allow new and smaller organisations to receive premises related support and access to council community properties, either directly or through sharing, when they may not have previously done so.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, thus the following groups are more likely to benefit as follows:</p> <p><b>For older people:</b></p> <ul style="list-style-type: none"> <li>Support for community interventions and activities that enable older people to live healthy, happy and independent</li> </ul>	<p>A number of organisations working with older people and with children and young people either rent property from the council or receive rent subsidy/DRR. Provided these organisations meet the eligibility criteria it is expected that this support will continue. However, as the policy will allow financial assistance to be distributed more broadly across VCS organisations without increasing the overall amount of funding provided, it is possible that an organisation with reserves totaling more than two years' operating costs or occupying a property with a higher rateable value, that is already in receipt of financial assistance, may cease to receive support if displaced by an eligible smaller organisation.</p>	<p>VCS organisations who responded to the consultation survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with.</p>

	<p>lives for as long as possible, avoiding isolation and loneliness. Community support for older people with long term health conditions or dementia, and carers support services.</p> <p><b>For children and young people:</b></p> <ul style="list-style-type: none"> <li>• Services, activities and facilities that support the physical and emotional wellbeing of children and their families and encourage young people to aspire to be the best they can be.</li> <li>• Awareness raising and prevention of trafficking, exploitation and FGM.</li> <li>• Integrated youth work with young people in school and excluded from school that will divert them from offending and keep them safe from violence</li> </ul>		
<p>Disability</p>	<p>There is a potential positive impact across all protected characteristics, given that the policy may allow new and smaller organisations to receive premises related support and access to council community properties, either directly or through sharing, when they may not have previously done so.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy. For people with disabilities this is likely to mean:</p> <ul style="list-style-type: none"> <li>• Support for community interventions and activities that enable disabled people to live healthy, happy and independent lives, avoiding isolation, loneliness and anxiety and improving access to employment.</li> </ul>	<p>A number of organisations working with those with disabilities either rent property from the council or receive rent subsidy/DRR. Provided these organisations meet the eligibility criteria it is expected that this support will continue. However, as the policy will allow financial assistance to be distributed more broadly across VCS organisations without increasing the overall amount of funding provided, it is possible that an organisation with reserves totaling more than two years' operating costs or occupying a property with a higher rateable value, that is already in receipt of financial assistance, may cease to receive support if displaced by an eligible smaller organisation.</p>	<p>VCS organisations who responded to the consultation survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with.</p>

	<ul style="list-style-type: none"> <li>• Community support for disabled people with long term health conditions, and carers support services.</li> <li>• Preventative early intervention enablement and support activities for physical and mental wellbeing. Community support for people with particular conditions, including HIV and mental health conditions.</li> </ul>		
<p>Gender</p>	<p>There is a potential positive impact across all protected characteristics, given that the policy may allow new and smaller organisations to receive premises related support and access to council community properties, either directly or through sharing, when they may not have previously done so.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, including organisations that provide:</p> <ul style="list-style-type: none"> <li>• Awareness raising and prevention of trafficking, exploitation and FGM.</li> <li>• Community responses to domestic abuse and sexual violence (DASV), which affects all parts of the community, including people in marriages and civil partnerships.</li> <li>• Support for lone parents (overwhelmingly women) that improves access to employment</li> </ul>	<p>A number of organisations working with women either rent property from the council or receive rent subsidy/DRR. Provided these organisations meet the eligibility criteria it is expected that this support will continue. However, as the policy will allow financial assistance to be distributed more broadly across VCS organisations without increasing the overall amount of funding provided, it is possible that an organisation with reserves totaling more than two years' operating costs or occupying a property with a higher rateable value, that is already in receipt of financial assistance, may cease to receive support if displaced by an eligible smaller organisation.</p>	<p>VCS organisations who responded to the consultation survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with.</p>

<p>Gender Reassignment</p>	<p>DRR/rent subsidy is not currently provided to VCS organizations working with this group. By extending funding to more organisations, it is possible that this protected characteristic group may benefit.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, including organisations that:</p> <ul style="list-style-type: none"> <li>• Run activities that promote community cohesion and festivals and cultural activities that are inclusive and diverse.</li> <li>• Contribute to partnership work to reduce hate crime</li> </ul>	<p>DRR/rent subsidy is not currently provided to VCS organizations working with this group. Provided these organisations meet the eligibility criteria it is expected that this support will continue. However, as the policy will allow financial assistance to be distributed more broadly across VCS organisations without increasing the overall amount of funding provided, it is possible that an organisation with reserves totaling more than two years' operating costs or occupying a property with a higher rateable value, that is already in receipt of financial assistance, may cease to receive support if displaced by an eligible smaller organisation.</p>	<p>VCS organisations who responded to the consultation survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with. The consultation feedback shows that of those who responded, no organisations working with the following protected characteristic groups rented a council property or received DRR/rent subsidy: Gender Reassignment, Sexual Orientation and Marriage or Civil Partnership.</p>
<p>Marriage or Civil Partnership</p>	<p>DRR/rent subsidy is not currently provided to VCS organizations working with this group. By extending funding to more organisations, it is possible that this protected characteristic group may benefit.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, including organisations that provide community responses to domestic abuse and sexual violence, which affects all parts of the community, including people in marriages and civil partnerships.</p>		<p>VCS organisations who responded to the consultation survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with. The consultation feedback shows that of those who responded, no organisations working with the following protected characteristic groups rented a council property or received DRR/rent subsidy: Gender Reassignment, Sexual Orientation and Marriage or Civil Partnership.</p>
<p>Religion or belief</p>	<p>There is a potential positive impact across all protected characteristics, given that the</p>		<p>VCS organisations who responded to the consultation</p>

	<p>policy may allow smaller organisations to receive funding when they may not have previously done so. However, it should be noted that under this policy organisations are supported if they provide services to the wider community rather than to their congregation alone.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, including organisations that:</p> <ul style="list-style-type: none"> <li>• Run activities that promote community cohesion and festivals and cultural activities that are inclusive and diverse.</li> <li>• Contribute to partnership work to reduce hate crime</li> </ul>		<p>survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with.</p>
<p>Race</p>	<p>There is a potential positive impact across all protected characteristics, given that the policy may allow smaller organisations to receive funding when they may not have previously done so.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, including organisations that provide:</p> <ul style="list-style-type: none"> <li>• Activities that promote community cohesion and festivals and cultural activities that are inclusive and diverse.</li> <li>• Support for migrants and people with no recourse to public funds, including help into jobs and reconnection to their home country.</li> <li>• Integrated youth work, involving young people at school, those excluded from school and those at risk of reoffending</li> </ul>	<p>A number of organisations working with those with BAME either rent property from the council or receive rent subsidy/DRR. Provided these organisations meet the eligibility criteria it is expected that this support will continue. However, as the policy will allow financial assistance to be distributed more broadly across VCS organisations without increasing the overall amount of funding provided, it is possible that an organisation with reserves totaling more than two years' operating costs or occupying a property with a higher rateable value, that is already in receipt of financial assistance, may cease to receive support if displaced by an eligible smaller organisation.</p>	<p>VCS organisations who responded to the consultation survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with.</p>
<p>Sexual Orientation</p>	<p>DRR/rent subsidy is not currently provided to VCS organizations working with this group. By extending funding to more</p>		<p>VCS organisations who responded to the consultation survey on the proposals have</p>



	<p>organisations, it is possible that this protected characteristic group may benefit.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, including organisations that:</p> <ul style="list-style-type: none"> <li>• Run activities that promote community cohesion and festivals and cultural activities that are inclusive and diverse.</li> <li>• Contribute to partnership work to reduce hate crime</li> </ul>		<p>been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with. The consultation feedback shows that of those who responded, no organisations working with the following protected characteristic groups rented a council property or received DRR/rent subsidy: Gender Reassignment, Sexual Orientation and Marriage or Civil Partnership.</p>
<p>Pregnancy or Maternity</p>	<p>There is a potential positive impact across all protected characteristics, given that the policy may allow smaller organisations to receive funding when they may not have previously done so.</p> <p>Support will be focussed on organisations that support priority outcomes in the VCS strategy, including organisations that provide:</p> <ul style="list-style-type: none"> <li>• Services, activities and facilities that support the physical and emotional wellbeing of children and their families</li> <li>• Support for lone parents (overwhelmingly women) that improves access to employment</li> </ul>	<p>A number of organisations working with mothers/parents either rent property from the council or receive rent subsidy/DRR. Provided these organisations meet the eligibility criteria it is expected that this support will continue. However, as the policy will allow financial assistance to be distributed more broadly across VCS organisations without increasing the overall amount of funding provided, it is possible that an organisation with reserves totaling more than two years' operating costs or occupying a property with a higher rateable value, that is already in receipt of financial assistance, may cease to receive support if displaced by an eligible smaller organisation.</p>	<p>VCS organisations who responded to the consultation survey on the proposals have been matched alongside the financial assistance they currently receive, and the people with protected characteristic(s) they work with.</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**

<b>Severity of Impact</b>	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	<b>Likelihood of Impact</b>			

**Key**

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

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**Table 3 – Impact scores**

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

## 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	A VCS organisation working with this group may lose financial assistance in the circumstances described in section 3.1.	With regard to rent subsidy, the council may apply extra priority under this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.	Simon Bashford	During the duration of this policy
Race	A VCS organisation working with this group may lose financial assistance	With regard to rent subsidy, the council may apply extra priority under	Simon Bashford	During the duration of this policy

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	in the circumstances described in section 3.1.	this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.		
Sex (gender)	A VCS organisation working with this group may lose financial assistance in the circumstances described in section 3.1.	With regard to rent subsidy, the council may apply extra priority under this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.	Simon Bashford	During the duration of this policy
Gender reassignment	As there are no known specialist VCS organisations working with this protected characteristic group, the likelihood of this group being impacted by the policy is low. If they are impacted, the severity will be equal to that of all other protected characteristic groups.	With regard to rent subsidy, the council may apply extra priority under this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.	Simon Bashford	During the duration of this policy
Sexual orientation	As there are no known specialist VCS organisations working with this protected characteristic group, the likelihood of this group being impacted by the policy is low. If they are impacted, the severity will be equal to that of all other protected characteristic groups.	With regard to rent subsidy, the council may apply extra priority under this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.	Simon Bashford	During the duration of this policy
Age	A VCS organisation working with this group may lose financial assistance	With regard to rent subsidy, the council may apply extra priority under	Simon Bashford	During the duration of this policy

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	in the circumstances described in section 3.1.	this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.		
Religion or belief	A VCS organisation working with this group may lose financial assistance in the circumstances described in section 3.1.	With regard to rent subsidy, the council may apply extra priority under this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.	Simon Bashford	During the duration of this policy
Pregnancy or maternity	A VCS organisation working with this group may lose financial assistance in the circumstances described in section 3.1.	With regard to rent subsidy, the council may apply extra priority under this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.	Simon Bashford	During the duration of this policy
Marriage/civil partnership	As there are no known specialist VCS organisations working with this protected characteristic group, the likelihood of this group being impacted by the policy is low. If they are impacted, the severity will be equal to that of all other protected characteristic groups.	With regard to rent subsidy, the council may apply extra priority under this policy if it considers that the organisation delivers a critical service. In addition, the Communities Team provide support and guidance on accessing funding opportunities.	Simon Bashford	During the duration of this policy

## 6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter <b>X</b> in column 3 ( <b>Conclusion</b> ) 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. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</b></p> <p>It is not expected that those of a particular protected characteristic will be disadvantaged by this policy. On the contrary, they are likely to benefit, as the effect of this policy is to target premises related support more effectively at organisations that support priority outcomes in the VCS strategy. Nonetheless, as the policy will allow financial assistance to be distributed more broadly across VCS organisations without increasing the overall amount of funding provided, it is possible that in certain circumstances some support currently given to a larger organisation may be directed to a smaller organisation in greater need. It is not, however, expected that there will be a disproportionate number of VCS organisations who lose out which work with a single protected characteristic group. The analysis identified groups which were unlikely to be adversely affected by the change as they do not currently receive financial assistance.</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. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b></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. <b>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.</b></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>	

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Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet	Meeting title: Cabinet Date: 20 <sup>th</sup> January 2020
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## 7. Sign-Off

Officers that must approve this decision	
Equalities Lead	Name: Yvonne Okiyo Date: 17.12.19 Position: Equalities Manager
Director	Name: Gavin Handford Date: 19.12.19 Position: Director Policy and Partnership