

Information Management Team: **Data Protection Impact Assessment**  
Version 2:0

## 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"> <li>- Are there additional concerns that need to be considered due to individuals sensitive/ complex circumstances? i.e. vulnerable person</li> </ul>	<p>Anyone who comments in writing to the Purley Way Masterplan Supplementary Planning Document consultation</p>
<p>What information is being used?</p> <ul style="list-style-type: none"> <li>- Consider the nature of this information E.g. Child's social care file</li> </ul>	<p>The names and contact details will be used to notify respondents of future stages of Purley Way Masterplan SPD, including adoption.</p> <p>However, they will have the option to opt out of future notifications should they not wish to hear in future from the Council regarding the Purley Way Masterplan SPD.</p> <p>The Spatial Planning Service will keep the data until 3 months after the adoption of SPD or conclusion of judicial review (depending on which comes later). The data will then be deleted.</p> <p>The representations will be forwarded to an external consultant team with the personal data stripped out. Sensitive data may be forwarded if relevant to representation made.</p>
<p>Does it include special category or criminal offence data?</p>	<p>If any representations made to the Council contains 'sensitive data' (which includes racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; or health, sex life and/or sexual orientation) then this may be held within the database if it is relevant to the comments being made (as part of a summary of the representation) on the basis that by submitting the information,</p>

Information Management Team: **Data Protection Impact Assessment**  
Version 2:0

	the person who made the representation is giving their explicit consent to the sensitive data being held within the database.
Can an individual be identified easily from the information?	Yes they will give their name, and their postal and/or e-mail address.
What is the potential impact on privacy of this information? <ul style="list-style-type: none"> <li>- <i>What are the risks/ impact to an individual if this information was lost, stolen or manipulated?</i></li> <li>- <i>E.g. could it be sold?</i></li> </ul>	If someone got hold of the information they could sell it as a contact list. If a person has included 'sensitive data' in their representations to the Council, and that information is relevant to their representation, then this information could be
Will this change the manner in which we handle, use or protect this information? <i>e.g. should it be encrypted?</i>	We will need to summarise the information for potential inclusion in an Adoption Statement for the Purley Way Masterplan SPD. No personal or sensitive data will be included in this statement.

### 3 Consultation process

Consider how to consult with relevant stakeholders.

When did you consult individuals?	We will consult from when the consultation starts <b>for 5 weeks from 11<sup>th</sup> January 2021</b>
How did you consult individuals?	They will be able to submit comments in a number of ways; on line survey, email and letter.
If not explain why it is not appropriate.	NA
Who else within the organisation have you consulted with?	Communications Team
Do you need to speak with your processor to assist?	No
Do you plan to consult information security experts or any other experts?	No

Information Management Team: **Data Protection Impact Assessment**  
Version 2:0

#### 4 Assessment of necessity and proportionality of data usage

What is your lawful basis for processing?	Planning and Compulsory Purchase Act 2004 supported by the Town and Country Planning (Local Planning)(England) Regulations 2012
Is consent being relied upon to share the information? Has explicit consent been obtained? Are data subjects able to opt out from giving consent?	The comments and personal details will not be made public, however comments may be subject to FOI.
Does the processing actually achieve your purpose?	We are required to consult to meet the Town and Country Regulations
How will the information be collected? Verbally, forms, intranet, interview, 3 <sup>rd</sup> party, anonymous)	Inputted by the person themselves
Is there another way to achieve the same outcome?	No
How will the information be used? <i>e.g. to write a report</i>	To support preparation of supplementary guidance to policies in a Development Plan Document
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?	There is information on any form that is used that explains why we need their data and that they can request to opt out from keeping updated about the SPD progress.
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>All original correspondence will be saved on Council server (not SharePoint) with access limited to members of Spatial Planning service.</p> <p>The Spatial Planning Service will keep the data until 3 months after the adoption of SPD or conclusion of judicial review (depending on which comes later). The data will then be deleted.</p> <p>The representations will be forwarded to an external consultant team with the personal data stripped out. Sensitive data may be forwarded if relevant to representation made.</p> <p>Paper records will be scanned as soon as possible upon receipt, with the electronic copy saved on a secure server, and the paper copy destroyed securely.</p>
How will you ensure data quality and data minimisation?	The person will input the details themselves.

Information Management Team: **Data Protection Impact Assessment**  
Version 2:0

Who will have access to the information within LBC? - <i>Include approximate number of users</i>	The staff in the Spatial Planning Team and our business support (c.15 users)
Are there new or significant changes to the way we manage, use, handle or collect this information? - <i>Include any identified concerns for the individuals, would these changes heighten risks involved</i>	No we have always collected and used this information like this for planning documents.
Will individuals within an existing database be subject to new or changed handling? - <i>If yes amendments need to be made to the privacy notice and these individuals need to be informed.</i>	No
What are the internal arrangements for processing this information? <i>e.g. number of staff who will have access</i>	As per question above – c.15 people
How will the information be updated? <i>e.g. monthly check</i>	The information will not be updated.
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?	One member of the external consultant team is based in Spain – we will ensure no personal or sensitive data is shared with this team member.
How will you prevent function creep?	The information is very specific and not very much use to anyone so unlikely but we will not share it.

## 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?	Project manager
How will the access to this information be controlled?	Council's server ( <a href="http://\lbcbau.croydon.net\grpdata\prc">\lbcbau.croydon.net\grpdata\prc</a> ) is restricted to members of Spatial Planning.
Is the data correctly managed to reduce the risk of collateral intrusion to the data subject?	Yes
Are there adequate provisions in place to protect the information? If so what are they? <i>e.g. Process, security</i>	Council's server ( <a href="http://\lbcbau.croydon.net\grpdata\prc">\lbcbau.croydon.net\grpdata\prc</a> ) is restricted to members of Spatial Planning

## 5b Sharing

Who is the information shared with, why are we sharing the information with this organisation?	The representations will be forwarded to an external consultant team with the personal data stripped out. Sensitive data may be forwarded if relevant to representation made.
What purpose does the information we are sharing have to the third party? <ul style="list-style-type: none"> <li>- <i>Ensure that we only share relevant information and not excessively</i></li> </ul>	The external consultant team are developing the masterplan on behalf of the council. The data is required to inform the development of the masterplan.
Who will have access to the information, externally? <ul style="list-style-type: none"> <li>- <i>Include approximate number of users</i></li> <li>- <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></li> </ul>	4 people (Masterplan consultants)
How will it be transmitted to third parties and when? How often? <ul style="list-style-type: none"> <li>- <i>Provide details of software used</i></li> </ul>	Electronic transfer.
Is there a data sharing agreement in place?	No
At what stage will the information be transferred?	Following the closure of the consultation in February 2021.

Information Management Team: **Data Protection Impact Assessment**  
Version 2:0

### 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
Loss of the data – someone steals it	2	2	4

Information Management Team: **Data Protection Impact Assessment**  
 Version 2:0

**6 Identify measures put in place to reduce risk.**

*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**

<b>Risk Identified</b>	<b>Options to reduce or eliminate risk</b>	<b>Effect on risk</b> <i>Eliminated / reduced / accepted</i>	<b>Residual risk</b> <i>Low / medium / high</i>	<b>Measure approved</b>  <i>Yes / No</i>
<b>Lost outside the organisation</b>	<b>Keep the information on on secure server with limited access</b>	Reduced	low	
<b>Names and addressed printed</b>	<b>Destroy all paper copies of representation once it has been scanned and saved on secure server</b>	Reduced	low	

Information Management Team: **Data Protection Impact Assessment**  
Version 2:0

### Sign off and Record sheet

Item	Notes, Name and date
Measures approved by:	
Residual risks approved by: <i>(If accepting any residual high risk must consult ICO before going ahead.)</i>	
IM advice provided:	
DPO advice provided: <i>(DPO should advise on compliance, measures to mitigate risk and whether processing should proceed)</i>	
IM sign off:	
DPO final sign off:	

**If you require further guidance to complete this DPIA please contact:**

**Information Management Team (IMT)**

Ext: 47777

Email: [information.management@croydon.gov.uk](mailto:information.management@croydon.gov.uk)

**Data Protection Officer**

Email: [DPO@croydon.gov.uk](mailto:DPO@croydon.gov.uk)



# 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>Place</b>
<b>Title of proposed change</b>	<b>Purley Way Masterplan Supplementary Planning Document – initial consultation</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Julia Dawe/Hannah Martin</b>

## 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.

**This is a proposal to consult on the initial draft of the Purley Masterplan Supplementary Planning Document (SPD) which forms part of a new chapter within the new Local Plan.**

**The consultation document will be used to ask whether the guidance for the planned development in the Purley Way area are appropriate, over the next 20 years.**

## 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	The outcomes delivered through the SPD would address this group generally.	Lack of sufficient housing, job opportunities and infrastructure.	<b>Sustainability Appraisal (Local Plan) Purley Way Business Audit</b>

	<p>The outcome delivered through the SPD of improved public realm including increased safety for more vulnerable age groups.</p> <p>The outcome delivered through the SPD of expanded employment space and new local centres will increase job opportunities for young people in the area</p>		<p><b>Purley Way Baseline Appraisal</b>  <b>Purley Way Socio Economic Analysis</b>  <b>Documents above can be found here</b></p>
Disability	<p>The outcomes delivered through the SPD would address this group generally.</p> <p>The outcomes delivered through the SPD of improved and more accessible public realm, new local centres, and increase in employment opportunities will help people with physical and mental health conditions to stay economically active, as well as having good quality, affordable and accessible housing.</p>	Lack of sufficient housing, job opportunities and infrastructure.	<b>See link above</b>
Gender	<p>The outcomes delivered through the SPD would address this group generally.</p> <p>The outcome delivered through the SPD of improved public realm including increased safety for more vulnerable gender groups.</p>	Lack of sufficient housing, job opportunities and infrastructure.	<b>See link above</b>
Gender Reassignment	<p>The outcomes delivered through the SPD would address this group generally.</p>	Lack of sufficient housing, job opportunities and infrastructure.	<b>See link above</b>
Marriage or Civil Partnership	<p>The outcomes delivered through the SPD would address this group generally.</p>	Lack of sufficient housing, job opportunities and infrastructure.	<b>See link above</b>
Religion or belief	<p>The outcomes delivered through the SPD would address this group generally.</p>	Lack of sufficient housing, job opportunities and infrastructure.	<b>See link above</b>
Race	<p>The outcomes delivered through the SPD would address this group generally.</p> <p>The outcome delivered through the SPD of additional housing will help to increase the support offered to people who find themselves in a position where they are accepted as homeless.</p>	Lack of sufficient housing, job opportunities and infrastructure.	<b>See link above</b>

Sexual Orientation	The outcomes delivered through the SPD would address this group generally	Lack of sufficient housing, job opportunities and infrastructure.	<b>See link above</b>
Pregnancy or Maternity	The outcomes delivered through the SPD would address this group generally	Lack of sufficient housing, job opportunities and infrastructure.	<b>See link above</b>

**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:

<b>Additional information needed and or Consultation Findings</b>	<b>Information source</b>	<b>Date for completion</b>
<b>The Purley Way SPD is undertaken to inform the Local Plan, and the final document will be adopted alongside the Local Plan. The final policies within the Local Plan, in particular the Purley Way policies that this SPD supports, will have a Sustainability Appraisal undertaken and an Equalities Impact assessment.</b>	<b>Sustainability Appraisal including Equalities Impact Assessment</b>	<b>Summer 2021</b>

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

## Equality Analysis

**Table 3 – Impact scores**

<b>Column 1</b>  <b>PROTECTED GROUP</b>	<b>Column 2</b>  <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>	<b>Column 3</b>  <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 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b>	<b>Column 4</b>  <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	1	1
Disability	1	1	1
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

## 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	Lack of employment opportunities, suitable housing, design and infrastructure	Ensure that there is sufficient and appropriate housing, <a href="#">sustainable</a> employment opportunities, design requirements and infrastructure through strategic outcomes and land allocations to address this	Steve Dennington/Hannah Martin	Adoption 2022



## Equality Analysis

Race	As above but applies to the whole population	A number of outcomes from the Purley Way Masterplan SPD generally address the needs of the residents of the borough. The objective for the delivery of <a href="#">good quality affordable</a> housing will help to increase the support offered to people who find themselves in a position where they are accepted as homeless.	Steve Dennington/Hannah Martin	Adoption 2022
Sex (gender)	As above but applies to the whole population	A number of outcomes from the Purley Way Masterplan SPD generally address the needs of the residents of the Purley Way area.	Steve Dennington/Hannah Martin	Adoption 2022
Gender reassignment	As above but applies to the whole population	A number of outcomes from the Purley Way Masterplan SPD generally address the needs of the residents of the Purley Way area.	Steve Dennington/Hannah Martin	Adoption 2022
Sexual orientation	As above but applies to the whole population	A number of outcomes from the Purley Way Masterplan SPD generally address the needs of the residents of the Purley Way area.	Steve Dennington/Hannah Martin	Adoption 2022
Age	Lack of employment opportunities, housing and inadequate infrastructure to support the needs of older people.	Ensure that there is sufficient and appropriate housing, <a href="#">sustainable</a> employment opportunities, design requirements and infrastructure through strategic outcomes and land allocations to address this	Steve Dennington/Hannah Martin	Adoption 2022

## Equality Analysis

Religion or belief	As above but applies to the whole population	A number of outcomes from the Purley Way Masterplan SPD generally address the needs of the residents of the Purley Way area.	Steve Dennington/Hannah Martin	Adoption 2022
Pregnancy or maternity	As above but applies to the whole population	A number of outcomes from the Purley Way Masterplan SPD generally address the needs of the residents of the Purley Way area.	Steve Dennington/Hannah Martin	Adoption 2022
Marriage/civil partnership	As above but applies to the whole population	A number of outcomes from the Purley Way Masterplan SPD generally address the needs of the residents of the Purley Way area.	Steve Dennington/Hannah Martin	Adoption 2022

### 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	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>	<b>X</b>
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. <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>	
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	

## Equality Analysis

	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>	
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: Cabinet Meeting Date: 21 <sup>st</sup> October 2019	

## 7. Sign-Off

<b>Officers that must approve this decision</b>	
<b>Equalities Lead</b>	Name: Yvonne Okiyo _____ Date: <u>8.12.20</u> Position: Equalities Manager
<b>Director</b>	Name: Heather Cheesbrough _____ Date: _____ Position: Director of Planning and Strategic Transport