

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	Policy and Partnerships
Title of proposed change	Equality Strategy 2020-2024
Name of Officer carrying out Equality Analysis	Yvonne Okiyo

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 proposed draft Equality Strategy 2020-24 sets out the Council's commitment to tackling and addressing inequality in Croydon, through a set of draft equality objectives and measures, over the next four years in accordance with the Equality Act public sector duty.

Equity and inclusion is integral to achieving our ambitions for Croydon – it is the very foundation upon which we ensure residents are treated fairly and equitably by the Council, its partners and service providers, giving individuals the opportunity to be who they are and achieve the successes they aspire to. This is particularly important for those who are most disadvantaged, so they too, can reach their full potential.

We aim to value diversity and promote equity and inclusion through our service provision, and as an employer. 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 must improve. We have developed this strategy in partnership with Croydon's residents, businesses, Voluntary and Community Sector (VCS) and staff – with a view to delivering a combined strategic vision for equality across the borough.

Croydon Council is the second largest of all the London boroughs in terms of population, with approximately 386,700 residents (ONS 2019).

Age and gender

Nearly a quarter of this figure (24.5%) is made up of young people aged 17 years or under. Croydon has the 4th largest proportion of young people in London which has implications on the types of services required to cater for the youth in Croydon.

There is a higher proportion of males compared to females in the 0-19 years age band; there is not a lot of difference between the proportions of males to females in the 20-39 years and 40-64 years age bands. In the above 65 years age band, there is a higher proportion of women to men.

Ethnicity

Just like other London boroughs, Croydon has a higher proportion of residents from the BAME communities compared to the national average. There was more diversity in the younger age group population in Croydon in 2011.

The proportion of Asian and Black residents in Croydon has been increasing since the 2011 Census. The proportion of White population is predicted to decrease by almost 10% by 2021.

Religion

Just over half (56.4%) of respondents to the 2011 Census in Croydon stated that they were Christian. About 1 in 5 (20.0%) stated that they had no religion. Significantly 7.6% of respondents did not state their religion.

Sexual Orientation

Sexual orientation was not captured by the 2011 Census. Based on ONS estimates, across London it was estimated that 2.6% of the population in 2014 identified themselves as gay, lesbian or bisexual. This was higher than the national average of 1.6%. By applying the London average to the Croydon population it was estimated that there were about 9,800 people in Croydon who would have identified as being gay, lesbian or bisexual.

Marital Status

The 2011 Census is the latest data source for marital status. The majority of adults aged over 16 in Croydon were either married or single in 2011.

Gender Identity

The Gender Identity and Research Society 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

There is not one comprehensive figure that can give a true picture of the total number of people with a disability in Croydon. 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. 22,493 people had their day-to-day activities limited a lot, whilst 28,134 had their day-to-day activities limited a little

Our Residents

Carers

The Census 2011 recorded 9.3% of the Croydon population as providing some form of unpaid care. This was slightly higher than the regional average of 8.5%. Of the 33,683 carers in Croydon, 65.5% provided up to 19 hours of unpaid care a week. However, 20.3%, equating to 6,870 people, provided 50 or more hours of unpaid care a week.

Proficiency in English

At the time of the 2011 census 14.5% of people in Croydon had a language other than English recorded as their main language. The majority could speak English well but around 1 in 6 of this group (17.2%) amounting to 2.5% of the total Croydon population at the time could not speak English well or at all.

Only 5.4% of 8 to 9 year olds were unable to speak English or could not speak English well. These children made up only 0.4% of all the 8 to 9 year olds in Croydon. Over half (51.5%) of those aged over 85 years could not speak English well or were unable to speak English. This older cohort made up 2.9% of all 85+ year olds in Croydon. A higher proportion of females (19.7%) compared to males (14.5%) could not speak English or speak English well.

Deprivation

Croydon has become relatively less deprived compared to other local authorities in England between IMD 2015 and IMD 2019

There remains geographic inequality in the distribution of deprivation in the borough with the North and East of the borough remaining more deprived

Wealth Inequality

There remains geographic inequality in the distribution of wealth in the borough with the North and East of the borough remaining more deprived. Croydon contains some of the poorest neighbourhoods in the country.

Education and Skills

- Attainment at Key Stage 2 is improving in Croydon but there is still more to do in this area.
- Take up of funded hours in early years settings is still below national and regional levels
- Whilst, in recent years, Croydon's GLD has been above the national, it has remained stubbornly lower in all aspects of language development, particularly in the aspect of 'speaking'.
- The proportion of children achieving grades AAB or above at Key Stage 5 is much lower than the national and regional averages
- Since 2015 at local, regional and national levels there has been a lower proportion of children from Black backgrounds achieving Attainment 8 scores
- Like with England as a whole Black Caribbean pupils in Croydon have the greatest level of disproportionately when it comes to exclusion from school.

Economy

- The job density rate measures the ratio of total jobs population aged 16-64 years. The Croydon rate is lower than national and regional levels.
- The proportion of out of work claimants has risen by around 5% since March 2020 – directly as a result of the impact of the Covid19 pandemic on the economy.
- There has been a huge increase in unemployment for 18-24 year olds and 50-64 year olds since April 2020.
- Croydon rate of out of work claimants has increased.

Housing

- Croydon had 1,657 net additional dwellings in 2019/2020. This is a 42% reduction on the 2016/2017 figure.
- For 2019/2020, 7 in 10 homeless households in Croydon were made up of residents from the non-White communities.
- Social housing in Croydon is mainly concentrated in the northern parts and the eastern edge of the borough.
- Over the years, by far the highest proportion of accepted homeless households in Croydon have been made up of lone parents with dependent children
- Latest figures for 2019/2020 show that more than half (56%) of homeless people in Croydon are in the 25-44 years age band
- There has been a disproportionately high percentage of homeless people from the Black community, both currently and historically.

Health

- Childhood immunisation rates continue to be lower in Croydon than across London and England
- The estimated dementia diagnosis rate for 65+ years has been going up every year in Croydon.
- Croydon has the 6th highest proportion of adults (aged 18+) classified as overweight or obese in London.

Social Isolation

In Croydon, there are an estimated 9,860 older people who are lonely and 5,423 older people who experience intense loneliness. There are also 17,227 people aged 18-64 who are socially isolated.

In addition, recent research has shown that 48% of Croydon residents would be willing to do more to support a neighbour; this may also have a positive impact on the health and wellbeing of the population, and social isolation.

Findings - workforce

Croydon Council is one of the largest local authorities in London, employing over 3000 staff. In the financial year 2018/19 it published its [workforce profile](#) that indicated:

- Croydon staff are largely women, with almost two-thirds (65.4%) of LBC employees being reported as female.
- The vast majority of council staff reported their current gender to be the same as their birth gender. Under one percent of individuals disclosed that their current gender deviates from their birth gender and only 1.9% of individuals chose not to provide any details of their gender reassignment.
- A slight minority of 43.2% of employees are of non-white ethnicity, with 55.6% of Croydon staff being of white ethnicity, and 1.2% choosing not to disclose their ethnicity.
- The vast majority (89.4%) of Croydon employees have no reported disabilities, with 8.8% of employees reporting a disability. A fraction (1.8%) of the employees in question chose to not disclose their disability status.
- Across the range of Croydon Council staff, over 70% of employees fell between the ages of 35 and 60. The best represented age range was from 50 – 55, constituting almost 21% of Croydon staff. 16 – 20 and 70+ were the most poorly represented age brackets, accounting for only 0.7% and 0.8% of total LBC staff, respectively.
- A large majority (79.4%) of Council staff reported as being heterosexual. In contrast, a combined total of less than 10% of employees reported to be non-heterosexual, pertaining to homosexual/gay, bi-sexual, or other sexual preferences. Under a fifth of employees (15.6%) chose not to disclose their sexual orientation.
- Over half (52.4%) hold Christian beliefs. The second largest group was employees with no religious beliefs, which comprised of 24.2% of Croydon Council staff. Just over one in ten (12.3%) chose not to disclose their religious practice and a combined total of less than 10% of employees held Muslim, Jewish, Hindu, Sikh or Buddhist beliefs. A small minority (3.9%) of council employees held religious and/or beliefs which varied from those provided stated in the equality questionnaire.
- The vast majority (66.6%) of staff are married. Never married/ civil partnership was the second most abundant status, comprising of 20.6% of council employees. Nearly one in ten council employees reported to have divorced from their spouse, with 1.7% of employees being separated but still legally married.

Whilst the Council has a positive gender mix, there is still more to do on ethnicity and disability if we are to meet our aspiration of employing a workforce that is representative of our communities.

The equalities monitoring of our workforce indicates that there is an under-representation within the workforce across salary ranges, with a negative funneling of representation for BAME staff at senior level.

National context

The strategy is being developed against a backdrop of prevalent international and national themes, which have been particularly highlighted in recent months by the Covid-19 pandemic. The virus has been unequal in its impact, in particular on BAME communities, but this is a result of long standing structural inequalities and socio-economic determinants of health. We have also seen a strong social response to racism through the Black Lives Matter movement. Whilst media focus may have been on cases in the USA, racism remains a very real issue for us to tackle in the UK as well. Since the EU referendum we have seen a rise in hate crimes and racism. These provide the context for the backdrop against which the strategy has been written.

Local contextEquality Framework for Local Government (EFLG): Equality Peer Challenge

The EFLG is a national benchmarking and assessment tool that helps local authorities to identify what they do well and where they can make improvements to, and deliver better equality outcomes for staff, residents and service users.

In November 2019, the Council asked the Local Government Association (LGA) to conduct an Equality Peer Challenge against the “Achieving” level of the Equality Framework for Local Government Accreditation. It undertook a self-assessment against five performance criteria:

- Knowing your communities
- Leadership, partnership and organisational commitment
- Involving your communities
- Responsive services and customer care
- A skilled and committed workforce

The Council satisfied the criteria for the Achieving level of the EFLG, the level we agreed to be assessed. The LGA made a number of recommendations to improve equality outcomes based upon the findings during the 3 day visit, which are set out [here](#).

Stonewall 2019/20 Workplace Equality Index

Croydon Council has been a Stonewall Diversity Champion and participated in the Stonewall Workplace Equality Index since 2014. This process assesses the Council’s progress on lesbian, gay, bi and trans inclusion in the workplace.

The process allowed the Council to demonstrate its work in the following ten areas of employment policy and practice:

- Policies and benefits
- The employee lifecycle
- LGBT employee network group Allies and role models
- Senior leadership
- Monitoring
- Procurement
- Community engagement
- Clients, customers and service users
- Additional work

In 2019, Croydon was ranked 148 out of over 500 organisations that took part. Stonewall made a number of recommendations to improve inclusion for lesbian, gay, bi and trans employees in the workplace. This can be found [here](#)

We use equality information – qualitative and quantitative - to inform our strategies and plans. The information in these documents continues to improve but we acknowledge there are data gaps within existing sources which require further analysis and/or a need to find out information about new protected characteristics.

Reliable information is a critical tool that helps us demonstrate fairness and how we are using it in practical ways to improve people's lives. However, it is clear that in some cases we don't have the information or that we have the information but it hasn't been used in any analysis. We have data gaps in our information about some vulnerable groups of people and where we do have information it is not always sophisticated enough to allow us to draw useful inferences. For example we have patchy information about people who identify themselves as lesbian, gay, bisexual or transgender, religious/faith groups, newer communities as well as some of the of the new protected characteristics. There are gaps in our data about who uses our frontline services, especially transactional activity such as over the counter, over the telephone and using the web. We also have basic information about the number of complaints about discrimination but not the nature.

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 draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. This will include working with partners to provide more	N/A	Borough Profile Croydon Observatory Consultation

	<p>opportunities for young people to share their views. The Council will also commit to empowering local people to participate and get involved in making decisions. It will engage and listen to staff residents and communities and work towards having open, honest and culturally appropriate conversations.</p> <p>The Council will develop an annual equality communications plan to it undertake effective, consistent and meaningful communications with staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.</p> <p>The plan will aim to champion equality, fairness, foster good relations between communities and counter discrimination, negative stereotypes or dispel myths. This also relates to the draft objective to ensure information about the council's work towards tackling inequality is easy to access and understand particularly for groups like older and young people</p> <p>The council to work with its partners to identify gaps, assess needs, set priorities and equalities objectives. It will use data and insight to review, rationalise and redesign services, with a focus on meeting priority needs, identifying those with the highest degree of need and tailoring interventions to meet these as well as locating our services where they are needed.</p> <p>Draft outcome 3 focuses on use partnerships to improve access and meet individual needs as they arise. The Council faces challenges around deprivation and inequalities in a range</p>		<p><u>Is Britain Fairer? The state of equality and human rights</u></p> <p><u>Health Inequity in England - The Marmot Review- 10 Years On</u></p> <p>LGBT Needs Assessment</p>
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of domains relating to income health, education and housing.

Young people in more deprived areas and those eligible for free school meals continue to have lower levels of attainment. This also relates to the draft objective to recognise the needs of individual groups and provide support to the most disadvantaged groups in the borough such as young care leavers and young BAME from specific communities. It will work with its partners to enable better education outcomes by offering support to vulnerable groups in targeted areas of the borough, including boys and those eligible for the PPG.

Like England as a whole, Black Caribbean pupils in Croydon have the greatest level of disproportionately when it comes to exclusion from school. The Council will continue to work with schools, local health services, and the community to reduce the need to exclude pupils.

In the East of the Borough there are known issues around lower average attainment scores for pupils, and a higher proportion of adults with no qualifications. Adults from a White ethnic background in Croydon in the 2011 Census were more likely to have no qualifications than adults from any other ethnic background. A third of the residents in both Fieldway and New Addington had no qualifications recorded. The proportion of White British residents in Fieldway and New Addington were 61.3% and 72.8% respectively. This also relates to the draft objective to offer support to groups that need it most to enable better education outcomes as well as to the draft objective to ensure

services are proactive in targeting groups that have accessibility issues as a result of mental health and language barriers

In common with much of the country, local child and adolescent mental health services are struggling to keep up with demand, often resulting in critical time being lost before diagnosis of developmental or mental health disorders. We want the local health service to work with the council and schools to look at new models that do more to bring services into schools and to work with families much earlier when there are problems.

Draft objective 2 under this outcome aims to support the creation of jobs that enhance quality of life particularly targeting those underrepresented in the employment sector identified as young people with income deprivation affecting children, 16% of children living in low income families and Croydon having the highest number of Looked After Children in London.

Draft outcome 4 of the strategy will focus on people in Croydon being supported to be in good health. Objective 1 under this outcome will see the Council working with partners to further tackle social isolation and bring people together, this will have a positive impact on older people

Objective 3 under this outcome will see the council work with its partners to open the door to health services, and support them to make sure residents know where and how to access services

The Council will also ensure it commissions suppliers that help us to address inequity and monitor their impact through our contract management framework. This will help us design and bring a focus on identifying and addressing issues and barriers that service users may have accessing services. Services should consider the needs of LGBT+ people across the life course, particularly for older people and consider individuals' previous experiences (e.g. discrimination).

The draft objective to increase our network across untapped communities, specifically harder to reach groups and their community leaders is designed to bring the focus to improving engagement mechanisms and structural barriers to enable people across a range of protected characteristics/under-represented groups to influence and participate in the decision making process.

Services will be required to be proactive in targeting groups that have accessibility issues. This will bring a focus to barriers to access to services on grounds of disability - physical, mental, digital and language. This will have a positive impact on older people

The draft objective to ensure our partners feel supported to reduce inequalities and discrimination that lead to school exclusions and young people entering the criminal justice system is designed to bring the focus on issues such as racial discrimination in schools, adultification and over-policing of young black boys, reducing the number of first time entrants to CJS, reducing school exclusions for groups such as Black

	Caribbean, looked after children and Gypsy, Roma and Traveller pupils		
Disability	<p>The draft objective that the Council's workforce reflects our diverse communities at all levels and take steps to close the disability pay gaps will have a positive impact on people living with a disability as they will be more represented at senior levels within the organisation</p> <p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. The Council will also commit to empowering local people to participate and get involved in making decisions. It will engage and listen to staff, residents and communities and work towards having open, honest and culturally appropriate conversations. This will give a positive impact on people living with visible and invisible disabilities.</p> <p>The Council will develop an annual equality communications plan to help it undertake effective, consistent and meaningful communications with its staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.</p> <p>The plan will aim to champion equality, fairness, foster good relations between communities and counter discrimination, negative stereotypes or dispel myths.</p> <p>The council will work with its partners to identify gaps, assess needs, set priorities and equalities objectives. It will use data and insight to review, rationalise and redesign services, with a focus on meeting priority</p>	N/A	<p>Consultation</p> <p>Equality Framework for Local Govt. Accreditation</p> <p><u>Is Britain Fairer? The state of equality and human rights</u></p>

needs, identifying those with the highest degree of need and tailoring interventions to meet these as well as locating our services where they are needed. This will give a positive impact on people living with visible and invisible disabilities.

Draft outcome 3 of the strategy will see the council using partnerships to improve access and meet individual needs as they arise

Draft objective 2 under this outcome aims to support the creation of jobs that enhance quality of life particularly targeting those underrepresented in the employment sector identified as people with disabilities. The Council will work with its partners including developers to continue to create fair employment and good work for all and in particular those furthest away from the job market as we work towards building an inclusive economy.

Draft objective 3 under this outcome will ensure services are proactive in targeting groups that have accessibility issues as a result of disability, age, mental health, language, digital and/ or physical barriers is designed to bring to focus challenges around equity of access to services and buildings.

The Council will take steps to ensure access to and appropriateness of services is monitored regularly. We will work towards supporting access to translation is easy, available and utilised and accommodate the needs of sight and hearing impaired staff and members of the public.

Draft outcome 4 of the strategy will focus on ensuring people in Croydon are supported to be in good health. Objective 1 under this outcome will see the Council working with partners to further tackle social isolation and bring people together

Objective 3 under this outcome will see the council work with its partners to open the door to health services, and support them to make sure residents know where and how to access services. This is designed to bring the focus to barriers to access to services on grounds of disability - physical, mental, digital and language

The draft equality objective to become a visible and active community leader and ambassador of equality by addressing social inequities is designed to bring to focus challenges around deprivation and inequalities in regards to income. It will not only focus on income, but on other factors including health, education and housing to bring greater focus to the needs of those at greatest or at risk of becoming further disadvantaged. Disabled people are also more likely to be in poverty. They also face poorer health and lack of access to suitable housing. Without the fundamental building blocks of good education, an adequate standard of living, and being safe and healthy, disabled people are often unable to participate fully in society. This also relates to the draft objective to recognise the needs of individual groups and provide support to the most disadvantaged groups in the borough.

The draft objective services are proactive in targeting groups that have accessibility

	<p>issues as a result of disability, age, mental health, language and/ or physical barriers</p> <p>The Council will also develop an autism strategy to raise awareness of autism and key challenges in the Borough</p>		
Gender	<p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. This will include increasing its networks across seldom heard groups, currently identified as women.</p> <p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. The Council will also commit to empowering local people to participate and get involved in making decisions. It engage and listen to staff residents and communities and work towards having open, honest and culturally appropriate conversations</p> <p>The Council will develop an annual equality communications plan to help us undertake effective, consistent and meaningful communications with our staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.</p> <p>The plan will aim to champion equality, fairness, foster good relations between communities and counter discrimination, negative stereotypes or dispel myths.</p> <p>The council to work with its partners to identify gaps, assess needs, set priorities and</p>	N/A	

equalities objectives. It will use data and insight to review, rationalise and redesign services, with a focus on meeting priority needs, identifying those with the highest degree of need and tailoring interventions to meet these as well as locating our services where they are needed.

Draft objective 2 under this outcome aims to support the creation of jobs that enhance quality of life particularly targeting those underrepresented in the employment sector identified as women. The Council will work with its partners including developers to continue to create fair employment and good work for all and in particular those furthest away from the job market as we work towards building an inclusive economy.

The draft equality objective to see more residents are given support to enter education, gain skills and access quality employment is designed to bring focus to challenges around gender stereotypes where young women are under-represented in STEM courses, despite girls performing better than boys in education, gender segregation is also prominent in apprenticeships. All of these factors contribute to women still being more likely to be in low-pay occupations. This also relates to the draft objective more residents are given support to enter education, gain skills and access quality employment as well as the draft objective to offer support to groups that need it most to enable better education outcomes

Sexual and domestic violence is a persistent and growing concern, and affects women and

	<p>girls disproportionately. This will be addressed by the future Community Safety Strategy.</p> <p>Draft outcome 4 of the strategy will focus on people in Croydon being supported to be in good health. Objective 1 under this outcome will see the Council working with partners to further tackle social isolation and bring people together</p> <p>Objective 3 under this outcome will see the council work with its partners to open the door to health services, and support them to make sure residents know where and how to access services.</p>		
Gender Reassignment	<p>The draft objective to increase our network across untapped communities, specifically seldom heard groups and their community leaders is designed to bring the focus to improving engagement mechanisms and structural barriers to enable people across a range of protected characteristics/under-represented groups to influence and participate in the decision making process. This will have a positive impact on those from this community.</p> <p>The Council will develop an annual equality communications plan to help us undertake effective, consistent and meaningful communications with our staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.</p> <p>The plan will aim to champion equality, fairness, foster good relations between communities and counter discrimination, negative stereotypes or dispel myths.</p>	N/A	

	<p>The council to work with its partners to identify gaps, assess needs, set priorities and equalities objectives. It will use data and insight to review, rationalise and redesign services, with a focus on meeting priority needs, identifying those with the highest degree of need and tailoring interventions to meet these as well as locating our services where they are needed. This will have a positive impact on those from this community.</p>		
Marriage or Civil Partnership	<p>None specifically identified from the information provided in the sources mentioned previously.</p>	N/A	
Religion or belief	<p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. The Council will also commit to empowering local people to participate and get involved in making decisions. It engage and listen to staff residents and communities and work towards having open, honest and culturally appropriate conversations</p> <p>The Council will develop an annual equality communications plan to help us undertake effective, consistent and meaningful communications with our staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.</p> <p>The plan will aim to champion equality, fairness, foster good relations between communities and counter discrimination, negative stereotypes or dispel myths.</p> <p>The council to work with its partners to identify gaps, assess needs, set priorities and equalities objectives. It will use data and insight to review, rationalise and redesign</p>		

	<p>services, with a focus on meeting priority needs, identifying those with the highest degree of need and tailoring interventions to meet these as well as locating our services where they are needed.</p> <p>A number of draft equality objectives are designed to improve the outcomes for people who share this protected characteristic in particular bring greater focus to the issues affecting living in the poorest parts of the borough and those who experience hate crime.</p>		
Race	<p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. This will include increasing its network across seldom heard groups, currently identified refugee and asylum seekers</p> <p>The draft objective that the Council's workforce reflects our diverse communities at all levels will provide more equity of opportunity for BAME staff who are underrepresented at senior levels within the organisation. It will also take steps to close the ethnicity pay gap</p> <p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. The Council will also commit to empowering local people to participate and get involved in making decisions. It engage and listen to staff residents and communities and work towards having open, honest and culturally appropriate conversations</p>	N/A	<p>Workforce Strategy</p> <p>Workforce Profile</p> <p>Consultation</p> <p><u>Is Britain Fairer? The state of equality and human rights</u></p>

The Council will develop an annual equality communications plan to help us undertake effective, consistent and meaningful communications with our staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.

The plan will aim to champion equality, fairness, foster good relations between communities and counter discrimination, negative stereotypes or dispel myths.

The council will work with its partners to identify gaps, assess needs, set priorities and equalities objectives. It will use data and insight to review, rationalise and redesign services, with a focus on meeting priority needs, identifying those with the highest degree of need and tailoring interventions to meet these as well as locating our services where they are needed.

Draft objective 2 under this outcome aims to support the creation of jobs that enhance quality of life particularly targeting those underrepresented in the employment sector identified as BAME. The Council will work with its partners including developers to continue to create fair employment and good work for all and in particular those furthest away from the job market as we work towards building an inclusive economy.

Draft outcome 4 of the strategy focuses on people in Croydon being supported to be in good health. Public Health England released a review of the disparities in risk and outcomes of COVID-19 in June 2020, with a follow up paper on understanding the impact

of COVID-19 on BAME Communities which contained recommendations for action. . Harms caused by COVID-19 has replicated existing health inequalities, and in some cases increased them.

The largest disparity found was age, but the risk of dying among those diagnosed with COVID-19 was also higher in males, than females; higher in those living in the more deprived areas than those living in the least deprived; and higher in those in Black, Asian and Minority Ethnic (BAME) groups than in White ethnic groups.

Objective 3 under this outcome will see the council work with its partners to open the door to health services, and support them to make sure residents know where and how to access services

The draft equality objective to become a visible and active community leader and ambassador of equality by addressing social inequities is designed to bring to focus challenges around deprivation and inequalities in regards to income. It will not only focus on income, but on other factors including health, education and housing to bring greater focus to the needs of those at greatest or at risk of becoming further disadvantaged.

Poverty is prevalent among some ethnic minorities. Black African, Bangladeshi and Pakistani people are still the most likely to live in poverty and deprivation, and – given the damaging effects of poverty on education, work and health – families can become locked into disadvantage for generations

Gypsy, Roma and Travellers face multiple disadvantages across different areas of life. They achieve below-average results at school, experience difficulties accessing healthcare, worse health, and often have low standards of housing.

Homelessness is also on the rise, putting more people in a precarious position and particularly affecting people from ethnic minorities. Of the households accepted as homeless in Croydon, around half are made up of people from the Black community, around a quarter are from the White community with the remainder made up of residents from all the other communities.

This also relates to the draft objective to recognise the needs of individual groups and provide support to the most disadvantaged groups in the borough.

The draft objective more residents are given support to enter education, gain skills and access quality employment is designed to bring focus to the need for equitable access to quality education, housing and living environments and in particular those from disadvantaged backgrounds.

The draft objective to increase our network across untapped communities, specifically harder to reach groups and their community leaders is designed to bring the focus to improving engagement mechanisms and structural barriers to enable people across a range of protected characteristics/under-represented groups to influence and participate in the decision making process. This also relates to the draft objective to ensure information about the council's work

	<p>towards tackling inequality is easy to access and understand as well as the draft objective to ensure key information about local communities is collected, analysed and used to inform decisions and improve services</p>		
Sexual Orientation	<p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. This will include increasing its network across seldom heard groups, currently identified as LGBT+</p> <p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. The Council will also commit to empowering local people to participate and get involved in making decisions. It engage and listen to staff residents and communities and work towards having open, honest and culturally appropriate conversations</p> <p>The Council will develop an annual equality communications plan to help us undertake effective, consistent and meaningful communications with our staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.</p> <p>The plan will aim to champion equality, fairness, foster good relations between communities and counter discrimination, negative stereotypes or dispel myths.</p> <p>The council will work with its partners to identify gaps, assess needs, set priorities and equalities objectives. It will use data and insight to review, rationalise and redesign</p>	N/A	<p>Stonewall Workplace Equality Index</p> <p>Equality Framework for Local Govt. Accreditation</p> <p>LGBT Needs Assessment (Draft)</p>

services, with a focus on meeting priority needs, identifying those with the highest degree of need and tailoring interventions to meet these as well as locating our services where they are needed.

The council work with its partners to open the door to health services, and support them to make sure residents know where and how to access services, this will have a positive impact on those who identify as LGBT+

The draft objective to ensure we commission suppliers that help us to address inequity and monitor their impact through our contract management framework is designed to bring a focus on identifying and addressing issues and barriers that service users may have accessing services (across protected characteristics and the life course). This would include monitoring their client and customer base to increase their reach and impact across all protected characteristics

A number of draft equality objectives are designed to improve the outcomes for people who share this protected characteristic in particular bring greater focus to the issues affecting living in the poorest parts of the borough and those who experience hate crime.

The draft objective to increase our network across untapped communities, specifically harder to reach groups and their community leaders is designed to bring the focus to improving engagement mechanisms and structural barriers to enable people across a range of protected characteristics/under-

	<p>represented groups to influence and participate in the decision making process. This also relates to the draft objective to ensure key information about local communities is collected, analysed and used to inform decisions and improve services</p>		
Pregnancy or Maternity	<p>The draft objective to ensure that our decision making reflects the views of Croydon residents by creating a diverse workforce is designed to bring a focus on pursuing a workforce diversity profile that reflects the local community at all levels. Bullying and sexual harassment are widespread in the workplace and in education, and three-quarters of new mothers have had a negative or potentially discriminatory experience at work as a result of pregnancy or maternity Objective will be aligned with the Workforce Strategy</p> <p>The draft equality outcome to work with our residents to better understand our communities will see the Council proactively empowering local people to participate and get involved in making decisions. The Council will also commit to empowering local people to participate and get involved in making decisions. It engage and listen to staff residents and communities and work towards having open, honest and culturally appropriate conversations</p> <p>The Council will develop an annual equality communications plan to help us undertake effective, consistent and meaningful communications with our staff, residents, communities and partners as well as share key messages on matters of equality and inclusion.</p> <p>The plan will aim to champion equality, fairness, foster good relations between</p>	N/A	<p><u>Is Britain Fairer? The state of equality and human rights</u></p>

	communities and counter discrimination, negative stereotypes or dispel myths.		
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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
In some cases we don't have the information or that we have the information but it hasn't been used in any analysis. We have data gaps in our information about some vulnerable groups of people and where we do have information it is not always sophisticated enough to allow us to draw useful inferences. For example we have patchy information about people who identify themselves as lesbian, gay, bisexual or transgender, religious/faith groups, newer communities as well as some of the of the new protected characteristics. There are gaps in our data about who uses our frontline services, especially transactional activity such as over the counter, over the telephone and using the web. We also have basic information about the number of complaints about discrimination but not the nature.		Ongoing

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	Column 3 SEVERITY OF IMPACT SCORE	Column 4 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	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				
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				
Age				
Religion or belief				
Pregnancy or maternity				

Equality Analysis

Marriage/civil partnership				
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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.	x
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	
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 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 Date: 18.02.21

7. Sign-Off

Equality Analysis

Officers that must approve this decision	
Equalities Lead	Name: Yvonne Okiyo Date: 20.01.21 Position: Equalities Manager
Director	Name: Gavin Handford Date: 20.01.21 Position: Director Policy and Partnerships