

# 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>Sustainable Communities</b>
<b>Title of proposed change</b>	<b>Adoption of the draft Croydon Carbon Neutral Action Plan</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Jamie Dorman/ Kelvin Shewry</b>

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

This Equality Analysis (EA) is being carried out to support the creation and adoption of the Croydon Carbon Neutral Action Plan (CCNAP). This is an operational document setting out the priorities and actions for the council's carbon neutrality ambition going forward. It is important to note that the plan itself is a live document and as such, likely to evolve over the next few years as it is added to and altered. The CCNAP must include programmes which deliver positive environmental and social outcomes as part of the transition towards the carbon neutral target of 2030.

### 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	<ul style="list-style-type: none"> <li>With a large and growing youth population, we need to ensure that the council is doing what it can in the fight against climate change. Nearly 60% of young people feel worried or extremely worried about climate change and more than 45% stated that feelings about climate change affected their daily lives. The CCNAP will have a broad remit regarding how we positively engage with Croydon residents, including the youth population.</li> <li>While literature examining the importance of access to natural environments and health is well-publicised, the impact this can have for an aging population cannot be underestimated. Accessible green infrastructure results in a range of positive</li> </ul>		<ul style="list-style-type: none"> <li><a href="#">BBC - eco-anxiety</a></li> <li>Dennis, M., Cook, P.A., James, P. et al. Relationships between health outcomes in older populations and urban green infrastructure size, quality and proximity. BMC Public Health 20, 626 (2020). <a href="https://doi.org/10.1186/s12889-020-08762-x">https://doi.org/10.1186/s12889-020-08762-x</a></li> </ul>

	<p>health-outcomes for lower income, older populations in urban neighbourhoods. While the Parks and Green Spaces Strategy is closely tied to this element of inclusion, other aspects of the CCNAP are also positively-related to Green Infrastructure. I.e. Greening our neighbourhoods and tree planting.</p> <ul style="list-style-type: none"> <li>• One of the priority areas of the CCNAP is driving a green economic recovery which is fair and just. This involves enabling evolution of the green jobs sector which is accessible to a broad population, including people of all genders, ethnicities, ages, sexual orientation, religions or beliefs and without prejudice.</li> </ul>		
Disability	<ul style="list-style-type: none"> <li>• The Parks and Green Spaces strategy, which forms a specific element of the CCNAP, recognizes that there are green spaces in Croydon with issues of accessibility. As such, the first priority of the Parks and Green Spaces strategy, focuses on accessibility and sets out how capital improvements will be made in these locations.</li> <li>• The development of the new Air Quality Action Plan is again, a formative element of the CCNAP. As such, there is evidence that children with intellectual disabilities (ID) are far more likely to live in areas with significantly higher levels of air pollution. This could be a contributing pathway to the health inequity experienced by people with IDs. As such, work to reduce air pollution throughout Croydon, would have a positive impact for this specific population group.</li> </ul>		<ul style="list-style-type: none"> <li>• Parks Masterplans Consultation - 2016-17</li> <li>• LBC Consultation – Autumn 2020</li> <li>• P&amp;G Survey – Summer 2020</li> <li>• P&amp;G Strategy Engagement – Nov-Dec 2021</li> <li>• Emerson E, Robertson J, Hatton C, Baines S. Risk of exposure to air pollution among British children with and without intellectual disabilities. J Intellect Disabil Res. 2019 Feb;63(2):161-167. doi: 10.1111/jir.12561. Epub 2018 Nov 20. PMID: 30461099.</li> </ul>
Gender	<ul style="list-style-type: none"> <li>• As mentioned previously, the Parks and Green Space Strategy, is an element of the CCNAP, and as such, is the most applicable 'risk' to gender. Research shows that women are more fearful in park spaces than men. Thus it's important to design and activate spaces in a way to promote confidence and</li> </ul>		<ul style="list-style-type: none"> <li>• Parks Masterplans Consultation - 2016-17</li> <li>• P&amp;G Survey – Summer 2020</li> <li>• P&amp;G Strategy Engagement – Nov-Dec 2021</li> </ul> <p>Public Health England. Improving access to greenspace: A new</p>

	<p>safety. Our first strategy priority is 'clean, safe and accessible green spaces' and it is the service ambition to respond to issues of fear in these places.</p> <ul style="list-style-type: none"> <li>As has been made clear by the Covid-19 pandemic, outdoor, green spaces have clear benefits to our health and wellbeing. If a protected groups are reticent to utilise green space due to perception of safety/fear, then it is important to address this through the new strategy and associated action plans forthcoming.</li> <li>One of the priority areas of the CCNAP is driving a green economic recovery which is fair and just. This involves enabling evolution of the green jobs sector which is accessible to a broad population, including people of all genders, ethnicities, ages, sexual orientation, religions or beliefs and without prejudice.</li> </ul>		<p>review for 2020.  <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/improving_access_to_greenpace_2020_review.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/improving_access_to_greenpace_2020_review.pdf</a>. 2020.</p>
Gender Identity	See Gender above.		
Marriage or Civil Partnership	There are no known specific impacts related to this protected group as relates to this action plan.		
Religion or belief	<ul style="list-style-type: none"> <li>One of the priority areas of the CCNAP is driving a green economic recovery which is fair and just. This involves enabling evolution of the green jobs sector which is accessible to a broad population, including people of all genders, ethnicities, ages, sexual orientation, religions or beliefs and without prejudice. As part of this action plan, there will be further work to develop a comprehensive and specific plan supporting green jobs.</li> </ul>		
Race	<ul style="list-style-type: none"> <li>BAME communities disproportionately suffer from a lack of access to nature/the environment, and are more likely to live in areas with high air pollution. As such, elements of increasing inclusion within the Parks and Green Spaces Strategy, and future</li> </ul>		<ul style="list-style-type: none"> <li>Collier (2019) Black Absence in Green Spaces. Available at: <a href="https://theecologist.org/2019/oct/10/black-absence-green-spaces">https://theecologist.org/2019/oct/10/black-absence-green-spaces</a>.</li> <li><a href="#">Ethnicity fact and figures</a>.</li> </ul>

	<p>work as part of the Air Quality Action Plan, will benefit this group. Further detail to be found within the associated strategy document.</p> <ul style="list-style-type: none"> <li>• BAME communities are also disproportionately represented in the population experiencing fuel poverty. The Croydon Healthy Homes initiative has £660k until at least May 2023, to help tackle fuel poverty by improving the energy efficiency of homes and reduce residents' fuel bills.</li> <li>• One of the priority areas of the CCNAP is driving a green economic recovery which is fair and just. This involves enabling evolution of the green jobs sector which is accessible to a broad population, including people of all genders, ethnicities, ages, sexual orientation, religions or beliefs and without prejudice.</li> </ul>		<ul style="list-style-type: none"> <li>• <a href="#">BAME and poorer Londoners more likely to live in areas with toxic air.</a></li> <li>• <a href="#">Fuel poverty and ethnicity</a></li> </ul>
Sexual Orientation	See Gender above.		
Pregnancy or Maternity	There are no known specific impacts related to this protected group as relates to this action plan.		

**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

**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	3	1	3
Disability	2	1	2
Gender	2	1	2
Gender reassignment	2	1	2
Marriage / Civil Partnership	1	1	1
Race	3	1	3
Religion or belief	2	1	2
Sexual Orientation	2	1	2
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		<p><b>The CCNAP is a live document which will be under continual review. As such, so will the equality analysis of the programmes that fall within the scope of the plan. Each programme will also undergo due analysis and will make provision for positively impacting protected groups.</b></p>		
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				
Age				
Religion or belief				
Pregnancy or maternity				
Marriage/civil partnership				

## 6. Decision on the proposed change

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

Decision	Definition	Conclusion - Mark 'X' below
No major change	<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.</p> <p><b>The adoption and implementation of this action plan will not create any service changes which will discriminate against protected groups. The council's ambition to achieve carbon neutrality by 2030 is driven by the declaration of the climate and ecological emergency. Without responding to this emergency, the negative impacts will affect all residents within the borough. As part of the response and transition to carbon neutral, the council's ambition is to ensure this is fair, just and supports those individuals who are already disproportionately impacted, as outlined above.</b></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>	

## Equality Analysis

Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet	Meeting title: <b>Cabinet</b> Date: <b>7 February 2022</b>
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### 7. Sign-Off

Officers that must approve this decision	
Equalities Lead	Name: Denise McCausland Date: 26 / 01 / 2022 Position: Equalities Manager
Director	Name: Steve Iles Date: 26 / 01 / 2022 Position: Director of Sustainable Communities