

Equality Analysis Form

Delivering for Croydon

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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	Spatial Planning, Growth Zone and Regeneration
Title of proposed change	Equalities Analysis – Croydon Growth Zone February 2022
Name of Officer carrying out Equality Analysis	Meaghan Kombol

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.

London Borough of Croydon is preparing for significant growth over the next 20 years. **The Croydon Growth Zone** was established in 2014 (and approved at Cabinet in 2016) as a framework for identifying, developing, funding and delivering infrastructure projects in the central area of Croydon, to enable increased economic growth through sustainable development. The Government identified Croydon as a Growth Zone in its 2014 Autumn Statement and subsequently confirmed the designation in the 2015 spring budget.

The Growth Zone programme originally comprised 46 projects, totalling £520million of improvements supported by a loan of up to £309.9million with the balance (circa £210million) met from other sources including TfL, the GLA or planning obligations. The business case and detailed background for these projects were included in the Growth Zone Delivery Plan and Programme produced by Peter Brett Associates in March 2018.

Significant progress has been made with town centre developments to move to the delivery stage of the Growth Zone programme. The package of measures aim to support the growing borough through providing enhanced transport capacity, reduced air pollution, an exciting cultural offer and the creation of new jobs as part of a larger, stronger local economy. It is anticipated that the Growth Zone framework will be in place until 2034, when the necessary infrastructure projects will have been fully implemented using funding drawn down from the loan financed by the business rate uplift in addition to funding from various other sources.

A new Cabinet Brief for 2022/23 has been written which shows a one year proposed programme, and is the subject of this EQIA. (It should be noted that an EQIA was undertaken for the Growth Zone September 2018). The new programme contains a range of proposed schemes across the borough, including Transport improvements, public realm improvements, pedestrian/cycling improvements, school streets, safety schemes, cycle parking, bus priority and a programme of cultural events as a part of Croydon's London Borough of Culture in 2023.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Deciding whether the potential impact is positive or negative

Table 1 – Positive/Negative impact

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	<p>The improvements will look to address the following statement:</p> <p>Children and young people often have their independent mobility curtailed due to concerns over road safety.</p> <p>Convenient, safe and reliable public transport is important for older people to continue participating in society.</p> <p>Safe and attractive walking and cycling routes facilitate travel by means other than the car as a way reducing congestion.</p> <p>The environmental quality and accessibility of the public realm is important for older people. Provision of accessible places to rest and street furniture is essential to encourage older people to enjoy the public realm.</p> <p>Reduction in traffic speeds and congestion increases road safety and improves pedestrian environment and perceived accessibility.</p> <p>Croydon has one of the highest levels of childhood obesity in London where the level is also generally higher than the rest of the country. Making walking and cycling to schools safer and more pleasant reduces childhood obesity.</p>	<p>None specific. Disadvantage may be Disability related. The proportion of Londoners who are disabled increases with age. 5% of 16 to 24-year-olds are disabled compared with 44% of Londoners aged 65 or over. See 'Disability' below.</p>	<p>Mayor of London's Transport Strategy; Mayor's Air Quality Strategy; Travel in London: Understanding our diverse communities 2019. Policy Studies Institutes study 'Children's Independent Mobility: A Comparative Study in England and Germany 1970 – 2010' Independent Mobility and Child Development, Nuffield Foundation 'Making Cycling Irresistible: Lessons from The Netherlands, Denmark and Germany', JOHN PUCHER and RALPH BUEHLER (2008) 'Young People's Travel – What's Changed and Why? Review and Analysis' (2018). Healthy Croydon Green Infrastructure & Natural Capital Accounting (2019).</p>

<p>Disability</p>	<p>Schools, shops, public realm and public transport are not always fully accessible and restrict access to employment, training and leisure for people living with a disability. People with impaired mobility will benefit from the area wide approach to improving access.</p> <p>The programme includes improvements to footways, including dropped kerbs, tactile paving and adjustment to bus stops to enhance accessibility, improved pedestrian crossings facilities and road safety improvements.</p> <p>The improvements will also deliver improved accessibility within the street environment and access to public transport at rail and tram stations. The work will attempt to design out as many barriers to movement as possible, including step free access, kerbs and steep ramp gradients and enhanced legibility.</p> <p>Implementation of inclusive design that meets the need of disabled people living with disabilities. Major public realm improvements are planned within the Town Centre each of which is the subject of separate access audits and will look to enhance accessibility.</p>	<p>The measures in the programme are intended to help all to choose to travel actively. However, care in design and implementation is needed including engaging with disabled people to help ensure that that the programme does address the many barriers that disabled people face to Active Travel and to encourage take up of walking, wheeling and cycling, and to create an accessible public transport system as a viable alternative to car-use. The Healthy Neighbourhood programme is one as is the public realm improvements in the town centre. However, additional action is likely to be required (work informed by access audits) to minimize barriers to movement for disabled people within and through these areas. Individual public realm, and Healthy Street projects will have their own Equalities Analysis undertaken.</p>	<p>Travel in London: Understanding our diverse communities 2019; TfL Cycling Action Plan. Pave The Way, Transport for All, January 2021</p> <p>EQIA for Healthy Streets</p> <p>EQIA for the Minster</p> <p>EQIA for Fairfield</p> <p>EQIA for Croydon Lit</p>
<p>Sex</p>	<p>Car ownership amongst women is lower than that amongst men, suggesting women are more reliant on other forms of transport including walking. This element of the delivery programme seeks to improve the pedestrian environment at local centre and transport corridors. It also seeks to support centre vitality and viability and thus sustain local services more readily accessed on foot.</p>	<p>n/a</p>	<p>Mayor of London's Transport Strategy; TfL Cycling Action Plan; TfL Travel in London Reports; Travel in London: Understanding our diverse communities 2019.</p>

	<p>Less women than men currently cycle. Research has shown that one of the biggest barriers to more women taking up cycling is road danger. Schemes that reduce road danger and provide safer spaces for cycling will benefit women. Women often feel unsafe walking within the built environment, particularly after dark. Schemes need to be appropriately lit, designed and encourage surveillance to address both the perception of fear and the actual. Schemes that encourage more walking/cycling/public transport use, should result in higher levels of natural surveillance on the street, benefitting those more vulnerable to street crime.</p>		
Gender Identity	<p>People with this transgender and non-binary individuals may be more vulnerable to hate crime. Schemes that encourage more walking/cycling/public transport use, should result in higher levels of natural surveillance on the street, benefitting those more vulnerable to street crime.</p> <p>Through working with art-based organisations, the Growth Zone is supporting artists and arts groups developing work that could be included in Croydon Pride 2023. Through the work with the Culture team to include artwork in the town centre, the programme aims to make places feel safe, to enhance placemaking and help to build civic pride and inclusive communities. This will also help support marginalized people through directing them to the arts through jobs and training</p>	n/a	<p>Travel in London: Understanding our diverse communities 2019. London Borough of Culture Stakeholder engagement 2021. Croydon Creates, Our Cultural Plan for Croydon, 2019 - 2023</p>
Marriage or Civil Partnership	<p>Impact here will be identified/the same as other protected characteristics, such as: race, religion or belief, gender identity, sex, disability, sexual orientation or pregnancy and maternity.</p>	<p>Impact here will be identified/the same as other protected characteristics, such as: race, religion or belief, gender identity, sex, disability, sexual orientation or pregnancy and maternity.</p>	

Religion or belief	Where there may be correlations between religion and race (see below characteristic commentary). More than half of black (68%) and white (57%) Londoners report that they are Christian. Asian Londoners and Londoners who have selected 'other' to describe their ethnic group are most likely to be Muslims (36% of Asian Londoners and 50% of Londoners selecting 'other' ethnic group are Muslims).The creation of safe, well surveilled environments that mitigate against hate crime.	Where there may be correlations between religion and race (see below).	Travel in London: Understanding our diverse communities 2019.
Race	<p>Cultural offer is designed to be diverse and inclusive of all races and ethnicities. Opportunities presented by the cultural programme support young people from BME backgrounds in terms of life chances, routes to employment and their wellbeing. This includes:</p> <ul style="list-style-type: none"> • Ensure our residents can access rich cultural experiences as part of their everyday lives, so we see an increase in the number of participants in the borough's cultural offer. • Support work that targets differently disadvantaged groups across Croydon through our grant aid and developmental opportunities • Identify barriers to participation and challenges, so that activities can include everyone and monitor that change • Embrace the diverse nature of our borough, supporting events that represent our various communities, such as Croydon PrideFest and Croydon Mela • Expand our Libraries service offer to further improve accessibility, increase our cultural offering and implement of a programme of activities (Libraries Plan 2019-2029) • Support small-scale and grass roots cultural activity from across the borough 	n/a	TfL Cycling Action Plan, TfL Travel in London Reports, Travel in London: Understanding our diverse communities 2019. Croydon Creates, Our Cultural Plan for Croydon, 2019 - 2023

	<ul style="list-style-type: none"> • Make culture a significant element in borough-wide district regeneration plans • Ensure that a significant part of Croydon's cultural offer remains free • Put people and community ownership first, having our communities as active partners in programmes, exhibitions and collections of the Clocktower and Museum <p>Those from BAME groups are more likely to walk or use the bus and will benefit the most from walking and bus priority/accessibility schemes. BAME Londoners are more at risk of being killed or seriously injured and will therefore benefit from schemes that reduce road danger. BAME Londoners are less likely to hold a driving licence compared to white Londoners, so will benefit more from sustainable travel schemes. (It should be noted that cycling levels amongst BAME and white Londoners is similar).</p>		
Sexual Orientation	LGBTQ+ people may be more vulnerable to hate crime. Schemes that encourage more walking/cycling/public transport use and enhanced and more accessible public realm should result in higher levels of natural surveillance on the street, benefitting those more vulnerable to street crime.	n/a	Travel in London: Understanding our diverse communities 2019.
Pregnancy or Maternity	Women tend to have less access to cars and are more likely to depend on public transport for making local journeys for shopping, childcare and work. The improvements will deliver ramps and level access as well as seats/benches for people to perch as well as seats with backs in playgrounds in the public realm and on public transport for pushchairs. The schemes will attempt to design out as many barriers to movement as possible,	Access to accessible toilets for pregnant women has been identified as an issue in the public realm. Action plans to be undertaken to identify opportunities for the design of public realm spaces which allows for the provision of accessible toilets.	Croydon Works Travel in London: Understanding our diverse communities 2019. Croydon's Local Plan 2018 (Strategic Objective 8 and 10)

	<p>including limitations to step free access, kerbs and steep ramp gradients.</p> <p>The increased accessibility of bus stops and quicker journey times, should benefit people pushing buggies, as should improvements to tram and train services.</p> <p>Croydon Works delivers opportunities for women who have to balance work and domestic responsibilities helping them access suitable employment and training opportunities close to home.</p>		
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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

<p>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:</p>		
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

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

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

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Table 3 – Impact scores

<p>Column 1</p> <p>PROTECTED GROUP</p>	<p>Column 2</p> <p>LIKELIHOOD OF IMPACT SCORE</p> <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>Column 3</p> <p>SEVERITY OF IMPACT SCORE</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>Column 4</p> <p>EQUALITY IMPACT SCORE</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	2	2	4
Disability	2	2	4
Sex	1	1	1
Gender Identity	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	2	1	2

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4. Statutory duties

4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Important note: Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

Table 4 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	All improvements have positive outcomes for everyone, however weaknesses in partnership working may result in schemes that don't maximise positive outcomes for groups sharing protected characteristics, in particular schemes undertaken by developers under their planning obligations, schemes	In developing the Growth Zone programme significant engagement has already taken place and continues with major developers and utility companies to identify infrastructure requirements. Policy objectives have been strengthened in	Spatial Planning, planning team Growth Zone	Local Plan Review completed and out for review Green Travel Plan completed.

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	<p>in geographical areas that don't have strong representation from relevant age/disability groups, etc.</p> <p>The audit for the public realm project in Old Town identified identified a potential negative effect for people with disabilities ability access the church/community centre, including on those with an essential need to use a car.</p>	<p>the Local Plan Review (2019-2039) which require developers to create accessible developments, including access to buildings, public realm and private and public amenity spaces.</p> <p>The Old Town public realm project helped to create a behaviour change with the community by creating a partnership between the end-user and Sustrans, enabled the creation of a Green Travel Plan (including a mini-bus, blue-badge parking and discounted/free car parking in a nearby facility).</p> <p>Existing and future projects to have an Accessible Audit undertaken with the Mobility Forum and the council's Access Officer.</p>		<p>Accessibility Audits to be undertaken at RIBA Stage 2/3 of projects.</p>
Race	n/a	n/a	n/a	n/a
Sex (gender)	n/a	n/a	n/a	n/a
Gender reassignment	n/a	n/a	n/a	n/a
Sexual orientation	n/a	n/a	n/a	n/a
Age	None specific, potentially related to age related Disability. See 'Disability' section above.	See 'Disability' above	Spatial Planning, planning team	Local Plan Review completed and out for review.

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				Accessibility Audits to be undertaken at RIBA Stage 2/3 of projects.
Religion or belief	n/a	n/a	n/a	n/a
Pregnancy or maternity	n/a	n/a	n/a	n/a
Marriage/civil partnership	n/a	n/a	n/a	n/a

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter X in column 3 (Conclusion) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.	
Adjust the proposed change	<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. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</p> <p>The Equalities Analysis has been initiated for the Growth Zone programme as a whole and further analysis will be undertaken as individual projects are progressed through the design stages and accessibility audits taken out at appropriate project stages. The sub-groups will ensure this occurs and where necessary action will be taken to mitigate any negative impacts on groups that share a protected characteristic.</p> <p>In addition, in exercising any delegated decision making, the officer in question will ensure that Equalities Analysis are appropriately explored and considered by the Decision maker prior to such decisions being taken.</p>	X

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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: Date:

7. Sign-Off

Officers that must approve this decision		
Equalities Lead	Name: Denise McCausland Position: Equalities Programme Manager	Date: 02/02/22
Director	Name: Heather Cheesbrough Position: Director of Planning and Sustainable Regeneration	Date: 03/02/22