

# 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

<b>Directorate</b>	<b>Housing</b>
<b>Title of proposed change</b>	<b>HRA 30 Year Business Plan</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Orlagh Guarnori</b>

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

30 year Business Plan for the Housing Revenue Account with consideration to both capital and revenue investments required for the management and maintenance of Croydon Council's housing stock

### 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>People will benefit from the overall investment in council housing of £31.5m in year one 2023-24.</p> <p>In addition our future (in particular the 2024-25 programme) will consist of a strengthened responsive repairs programme.</p> <p>The 2008 climate change act commits the UK to reducing greenhouse gas emissions by 80% by 2050. Government</p>	<p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp; in the majority are in the North &amp; East of the Borough</p> <p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p>	<p>Council tenants can be broken down into the following age groups:</p> <p>20-29: 4%</p> <p>30-39: 14%</p> <p>40-49: 19%</p> <p>50-59: 25%</p> <p>60-69: 18%</p> <p>70-79: 11%</p> <p>80-89: 6%</p> <p>90-99: 1%</p>

	policy is for all homes to meet nearly net zero carbon levels by 2050	Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required	30-59 y/o tenants constitute 44% of Council tenants (more than any other two age groups combined)
Disability	<p>People will benefit from the overall investment in council housing of £31.5m in year one 2023-24. In addition our future (in particular the 2024-25 programme) will consist of a strengthened responsive repairs programme</p> <p>Eligible tenants will benefit from the provision of disabled adaptations (major and minor) to existing council housing</p>	<p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp; in the majority are in the North &amp; East of the Borough</p> <p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p> <p>Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required</p>	<p>14.1% of Croydon residents identified as having a disability in 2011.</p> <p>The Council does not collect disability data on Council tenants. Data collection on protected characteristics of Council tenants will be improved from May 2023 due to the implementation of the NEC Housing system.</p>
Sex	<p>People will benefit from the overall investment in council housing of £31.5m in year one 2023-24. In addition our future (in particular the 2024-25 programme) will consist of a strengthened responsive repairs programme.</p> <p>The positive impact listed below will impact more residents identifying as female than those identifying as male.</p>	<p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp; in the majority are in the North &amp; East of the Borough</p> <p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p> <p>Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required</p>	<p>The gender of Council tenants is as follows:</p> <p>Female: 67%</p> <p>Male: 33%</p>
Gender identity	People will benefit from the overall investment in council housing.		The Council does not collect data on the gender identity of Council tenants. Data

		<p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp; in the majority are in the North &amp; East of the Borough</p> <p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p> <p>Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required</p>	<p>collection on protected characteristics of Council tenants will be improved from May 2023 due to the implementation of the NEC Housing system.</p>
Marriage or Civil Partnership	<p>People will benefit from the overall investment in council housing.</p> <p>There is not expected to be any particular negative impact on this specific group</p>	<p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp; in the majority are in the North &amp; East of the Borough</p> <p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p> <p>Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required</p>	<p>The Council does not collect data on the marriage or civil partnership status of tenants. Data collection on protected characteristics of Council tenants will be improved from May 2023 due to the implementation of the NEC Housing system.</p>
Religion or belief	<p>Developing and supporting staff to provide great customer service will ensure appropriate and sensitive services are delivered to the</p>	<p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp; in</p>	<p>The Council does not collect data on the religion or belief of Council tenants. Data collection on protected characteristics of Council tenants will be improved from</p>

	<p>religious or belief requirements of tenants.</p> <p>People will benefit from the overall investment in council housing of £31.5m in year one 2023-24. In addition our future (in particular the 2024-25 programme) will consist of a strengthened responsive repairs programme.</p>	<p>the majority are in the North &amp; East of the Borough</p> <p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p> <p>Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required</p>	<p>May 2023 due to the implementation of the NEC Housing system.</p>
Race	<p>People will benefit from the overall investment in council housing of £31.5m in year one 2023-24. In addition our future (in particular the 2024-25 programme) will consist of a strengthened responsive repairs programme.</p>	<p>The negative impacts listed below will impact more residents identifying as Black or White than those identifying as other ethnic groups.</p> <p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp; in the majority are in the North &amp; East of the Borough</p> <p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p> <p>Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required</p>	<p>Council tenants can be broken down into the following ethnicity groups:</p> <p>Asian: 9% Black: 37% White: 47% Mixed: 4% Other: 3%</p>
Sexual Orientation	<p>People will benefit from the overall investment in council housing of £31.5m in year one 2023-24. In addition our future (in particular the 2024-25 programme) will consist of a</p>	<p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp; in the majority are in the North &amp; East of the Borough</p>	<p>The Council does not collect data on the sexual orientation of tenants.</p> <p>Data collection on protected characteristics of Council tenants will be improved from May 2023 due to the</p>

	<p>strengthened responsive repairs programme.</p> <p>Croydon's HRA owns 8.7% of all homes in the borough</p> <p>99.68% of stock pass the existing decent homes standard</p> <p>The 2008 climate change act commits the UK to reducing greenhouse gas emissions by 80% by 2050. Government policy is for all homes to meet nearly net zero carbon levels by 2050</p>	<p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p> <p>Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required</p>	<p>implementation of the NEC Housing system.</p>
<p>Pregnancy or Maternity</p>	<p>People will benefit from the overall investment in council housing of £31.5m in year one 2023-24. In addition our future (in particular the 2024-25 programme) will consist of a strengthened responsive repairs programme.</p> <p>Croydon's HRA owns 8.7% of all homes in the borough</p> <p>99.68% of stock pass the existing decent homes standard</p> <p>The 2008 climate change act commits the UK to reducing greenhouse gas emissions by 80% by 2050. Government policy is for all homes to meet nearly net zero carbon levels by 2050</p>	<p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp; in the majority are in the North &amp; East of the Borough</p> <p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p> <p>Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required</p>	<p>The Council does not collect data on the pregnancy or maternity status of tenants.</p> <p>Data collection on protected characteristics of Council tenants will be improved from May 2023 due to the implementation of the NEC Housing system</p>

**Important note:** You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

### 3.2 Additional information needed to determine impact of proposed change

**Table 2 – Additional information needed to determine impact of proposed change**

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	Information source	Date for completion

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

### 3.3 Impact scores

#### Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact )
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

**Table 4 – Equality Impact Score**

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



	<b>Likelihood of Impact</b>
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**Key**

<b>Risk Index</b>	<b>Risk Magnitude</b>
6 – 9	High
3 – 5	Medium
1 – 3	Low

**Table 3 – Impact scores**

<p><b>Column 1</b></p> <p><b>PROTECTED GROUP</b></p>	<p><b>Column 2</b></p> <p><b>LIKELIHOOD OF IMPACT SCORE</b></p> <p>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.</p> <p><b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b></p>	<p><b>Column 3</b></p> <p><b>SEVERITY OF IMPACT SCORE</b></p> <p>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.</p> <p><b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b></p>	<p><b>Column 4</b></p> <p><b>EQUALITY IMPACT SCORE</b></p> <p>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.</p> <p><b>Equality impact score = likelihood of impact score x severity of impact score.</b></p>
Age	3	2	6
Disability	2	2	4
Gender	3	2	6
Gender reassignment	2	2	4
Marriage / Civil Partnership	2	2	4
Race	3	2	6
Religion or belief	2	2	4
Sexual Orientation	2	2	4
Pregnancy or Maternity	2	2	4

## 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>Disability 14.1% of the population in Croydon on the last census identified as having a disability</p> <p>Croydon's HRA owns 8.7% of all homes in the borough</p> <p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp;</p>	<p>Negative impact on all tenants will be mitigated through the actions below:</p> <p>We will communicate with all tenants to explain any significant changes affecting them and what we are investing in.</p>	Interim Director of Tenancy Services, Housing Resident Engagement & Allocations	2023 – ongoing

## Equality Analysis

	<p>in the majority are in the North &amp; East of the Borough</p> <p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p> <p>Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required</p>	<p>We will focus on the properties most in need of investment</p> <p>We will increase engagement with engage tenants through existing groups and seek involvement of minority groups through these channels</p> <p>We will offer translation of communication into alternative languages.</p> <p>The Council will deliver capital expenditure programme that will grow year on year the basis of this programme is our existing stock conditions and ongoing and rolling survey programmes will inform the future spend</p>		
Race	<p>Those for whom English is not their first language are not made fully aware of changes.</p>	<p>We will offer translation of communication into alternative languages.</p> <p>We will communicate with all tenants to explain any significant changes affecting them and what we are investing in.</p>	<p>Interim Director of Tenancy Services, Housing Resident Engagement &amp; Allocations</p>	<p>2023 – ongoing</p>

## Equality Analysis

		<p>We will focus on the properties most in need of investment</p> <p>We will increase engagement with engage tenants through existing groups and seek involvement of minority groups through these channels</p> <p>The Council will deliver capital expenditure programme that will grow year on year the basis of this programme is our existing stock conditions and ongoing and rolling survey programmes will inform the future spend</p>		
Sex	<p>PEOPLE (LEAD RESIDENT)</p> <p>31.5% Male 68.5% Female Will be impacted</p> <p>Croydon's HRA owns 8.7% of all homes in the borough</p> <p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp; in the majority are in the North &amp; East of the Borough</p>	<p>The Council will consider barriers to accessing information likely to be faced by tenants identifying as female.</p> <p>We will communicate with all tenants to explain any significant changes affecting them and what we are investing in.</p> <p>We will focus on the properties most in need of investment</p>	Interim Director of Tenancy Services, Housing Resident Engagement & Allocations	2023 – ongoing

## Equality Analysis

	<p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p> <p>Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required</p>	<p>We will increase engagement with engage tenants through existing groups and seek involvement of minority groups through these channels</p> <p>We will offer translation of communication into alternative languages.</p> <p>The Council will deliver capital expenditure programme that will grow year on year the basis of this programme is our existing stock conditions and ongoing and rolling survey programmes will inform the future spend</p>		
Gender identity	<p>Croydon's HRA owns 8.7% of all homes in the borough</p> <p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp; in the majority are in the North &amp; East of the Borough</p> <p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p>	<p>We will communicate with all tenants to explain any significant changes affecting them and what we are investing in.</p> <p>We will focus on the properties most in need of investment</p> <p>We will increase engagement with engage tenants through existing groups and seek involvement of</p>	Interim Director of Tenancy Services, Housing Resident Engagement & Allocations	2023 – ongoing

## Equality Analysis

	<p>68.8% is the average energy rating for homes currently</p> <p>Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required</p>	<p>minority groups through these channels</p> <p>We will offer translation of communication into alternative languages.</p> <p>The Council will deliver capital expenditure programme that will grow year on year the basis of this programme is our existing stock conditions and ongoing and rolling survey programmes will inform the future spend</p>		
<p>Sexual orientation</p>	<p>It was estimated that 2.6% identified themselves as gay.</p> <p>Croydon's HRA owns 8.7% of all homes in the borough</p> <p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp; in the majority are in the North &amp; East of the Borough</p> <p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p>	<p>We will communicate with all tenants to explain any significant changes affecting them and what we are investing in.</p> <p>We will focus on the properties most in need of investment</p> <p>We will increase engagement with engage tenants through existing groups and seek involvement of minority groups through these channels</p> <p>We will offer translation of communication into alternative languages.</p>	<p>Interim Director of Tenancy Services, Housing Resident Engagement &amp; Allocations</p>	<p>2023 – ongoing</p>

## Equality Analysis

	Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required	The Council will deliver capital expenditure programme that will grow year on year the basis of this programme is our existing stock conditions and ongoing and rolling survey programmes will inform the future spend		
Age	<p>Croydon's HRA owns 8.7% of all homes in the borough</p> <p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp; in the majority are in the North &amp; East of the Borough</p> <p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p> <p>Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required</p>	<p>We will communicate with all tenants to explain any significant changes affecting them and what we are investing in.</p> <p>We will focus on the properties most in need of investment</p> <p>We will increase engagement with engage tenants through existing groups and seek involvement of minority groups through these channels</p> <p>We will offer translation of communication into alternative languages.</p> <p>The Council will deliver capital expenditure programme that will grow year on year the basis of this programme is our existing stock conditions and ongoing and rolling</p>	Interim Director of Tenancy Services, Housing Resident Engagement & Allocations	2023 – ongoing



## Equality Analysis

		survey programmes will inform the future spend		
Religion or belief	<p>Croydon's HRA owns 8.7% of all homes in the borough</p> <p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp; in the majority are in the North &amp; East of the Borough</p> <p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p> <p>Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required</p>	<p>We will communicate with all tenants to explain any significant changes affecting them and what we are investing in.</p> <p>We will focus on the properties most in need of investment</p> <p>We will increase engagement with engage tenants through existing groups and seek involvement of minority groups through these channels</p> <p>We will offer translation of communication into alternative languages.</p> <p>The Council will deliver capital expenditure programme that will grow year on year the basis of this programme is our existing stock conditions and ongoing and rolling survey programmes will inform the future spend</p>	Interim Director of Tenancy Services, Housing Resident Engagement & Allocations	2023 – ongoing

## Equality Analysis

<p>Pregnancy or maternity</p>	<p>Croydon's HRA owns 8.7% of all homes in the borough</p> <p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp; in the majority are in the North &amp; East of the Borough</p> <p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p> <p>Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required</p>	<p>We will communicate with all tenants to explain any significant changes affecting them and what we are investing in.</p> <p>We will focus on the properties most in need of investment</p> <p>We will increase engagement with engage tenants through existing groups and seek involvement of minority groups through these channels</p> <p>We will offer translation of communication into alternative languages.</p> <p>The Council will deliver capital expenditure programme that will grow year on year the basis of this programme is our existing stock conditions and ongoing and rolling survey programmes will inform the future spend</p>	<p>Interim Director of Tenancy Services, Housing Resident Engagement &amp; Allocations</p>	<p>2023 – ongoing</p>
<p>Marriage/civil partnership</p>	<p>Croydon's HRA owns 8.7% of all homes in the borough</p> <p>81% of Council owned homes are in areas of high deprivation (IMD 1-3) &amp;</p>	<p>We will communicate with all tenants to explain any significant changes affecting them and what we are investing in.</p>	<p>Interim Director of Tenancy Services, Housing Resident</p>	<p>2023 – ongoing</p>

# Equality Analysis

	<p>in the majority are in the North &amp; East of the Borough</p> <p>66% of Council owned homes are in areas of higher than the national average levels of fuel poverty</p> <p>68.8% is the average energy rating for homes currently</p> <p>Nearly 80% of the 2050 stock has already been built therefore expensive retrofit zero carbon initiatives will be required</p>	<p>We will focus on the properties most in need of investment</p> <p>We will increase engagement with engage tenants through existing groups and seek involvement of minority groups through these channels</p> <p>We will offer translation of communication into alternative languages.</p> <p>The Council will deliver capital expenditure programme that will grow year on year the basis of this programme is our existing stock conditions and ongoing and rolling survey programmes will inform the future spend</p>	<p>Engagement &amp; Allocations</p>	
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## 6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter <b>X</b> in column 3 ( <b>Conclusion</b> ) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	<p>Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review.</p> <p><b>Croydon's HRA owns 8.7% of all homes in the borough. 99.68% of stock pass the existing decent homes standard</b></p>	<b>X</b>

## Equality Analysis

	<b>The mitigation identified in section 5 will be used to improve the HRA Business Plan and this will be reviewed on an annual basis .</b>	
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b>	
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. <b>If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.</b>	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Date:

## 7. Sign-Off

<b>Officers that must approve this decision</b>		
<b>Equalities Lead</b>	<b>Name:</b>	<b>Date:</b>

# Equality Analysis

	<b>Position:</b>	
<b>Director</b>	<b>Name:</b>	<b>Date:</b>
	<b>Position:</b>	

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