

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	Sustainable Communities, Regeneration & Economic Recovery, Street Lighting
Title of proposed change	Street Lighting Policy
Name of Officer carrying out Equality Analysis	John Algar

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

Policy seeks to reduce operating costs and energy usage with reduction in Carbon Emissions, whilst maintaining safety on the highway.

The Authority have the capability in reducing our lighting levels via the Central Management System built into our street lighting assets. Looking to reduce lighting levels in both residential roads and strategic road network (main roads).

Seeking to reduce lighting levels with a choice of 4 different dimming options as follows:

Residential Roads

Dim 1 = 50% between 19.00 - 05.00hrs

Dim 2 = 50% from switch on – switch off (all night)

Dim 3 = 50% from switch on – Midnight. Lights turned off rest of night.

Dim 4 = 50% from switch on – Midnight. Lights turned off Midnight – 05.00hrs, 50% 05.00 hrs – switch off.

Main Roads

Dim 1 = 50% between Midnight - 05.00hrs

Dim 2 = 50% from switch on – switch off (all night)

Dim 3 = 50% from switch on – Midnight. Lights turned off rest of night.

Dim 4 = 50% from switch on – Midnight. Lights turned off Midnight – 05.00hrs, 50% 05.00 hrs – switch off.

3. Impact of the proposed change

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	Testing of Variant Lighting Levels in 2015-16 in selected residential roads across the borough for a 3 month period saw no enquiries or complaints regarding any reduction in lighting levels. Further trial carried out from January 2022 – October 2022 with no complaints received.	The lowering of lighting levels may deter older people from going out in their vehicle or going for walks at night. Possibly more vulnerable groups could feel less safe e.g older people	Variant Lighting Level trial carried out in 2015-16 & 2022
Disability	Testing of Variant Lighting Levels in 2015-16 in selected residential roads across the borough for a 3 month period saw no enquiries or complaints regarding any reduction in lighting levels. Further trial carried out from January 2022 – October 2022 with no complaints received	Possibly more vulnerable groups could feel less safe e.g. visually impaired or those with a physical disability	Variant Lighting Level trial carried out in 2015-16 & 2022
Gender	n/a	Possibly more vulnerable groups could feel less safe e.g. women	Not related
Gender Reassignment	n/a	Possibly more vulnerable groups could feel less safe e.g. those from the LGBT community	Not related
Marriage or Civil Partnership	n/a	n/a	Not related
Religion or belief	n/a	n/a	Not related
Race	n/a	n/a	Not related
Sexual Orientation	n/a		Not related
Pregnancy or Maternity	n/a	Possibly more vulnerable groups could feel less safe e.g. women	Not related

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
	Likelihood of Impact			

Key

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

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	1	2
Disability	2	1	2
Sex	2	1	2
Gender reassignment	2	1	2
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

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 x
- Eliminating unlawful discrimination, harassment and victimisation x
- Fostering good relations between people who belong to protected characteristic groups

5. Action Plan to mitigate negative impacts of proposed change

Important note:

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	Possibly more vulnerable groups could feel less safe, i.e elderly or partially blind people.	Lighting levels can be instantly reverted back to 100% functionality	John Algar	Upon any complaint or enquiry received?
Race	Not affected	n/a	n/a	n/a
Sex (gender)	Not affected	Lighting levels can be instantly reverted back to 100% functionality	John Algar	As Above
Gender reassignment	Not affected	As above	As above	As above
Sexual orientation	Not affected	Lighting levels can be instantly reverted back to 100% functionality	As above	As above

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Age	The lowering of lighting levels may deter older people from going out in their vehicle or going for walks at night. Possibly more vulnerable groups could feel less safe	As above	John Algar	Upon any complaint or enquiry received?
Religion or belief	Not affected	n/a	n/a	n/a
Pregnancy or maternity	Not affected	As above	As above	As above
Marriage/civil partnership	Not affected	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.	

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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.</p> <p>Having carried out a "dimming" trial in 2015-16 we reduced our lighting levels in random pre-selected streets and a further reduction across the whole borough in 2022. The result of these trials were that no issues were raised by any stakeholders. The reduction of the lighting levels were carried out during times where the fear and risk of crime is greatly reduced i.e after 7.00pm in residential streets and pre-selected times i.e after / before rush hour periods.</p> <p>District Town Centres, areas with CCTV Camera control and our Strategic Road Network will not have lighting levels reduced until after Midnight.</p> <p>The authority have the capability of reducing its lighting levels via the Central Management System but also gives us the capability of returning the lighting levels to 100% capacity at an instant rectification process. Each street lighting column has its own Node to control the lighting levels in each road.</p> <p>As part of the Client Monitoring teams duty is to review the Service Providers performance via a Monthly Monitoring Report. Having reviewed this report there have been no complaints in relation to a similar variant lighting level policy introduced by Lewisham in 2016(joint PFI Contract). To date there have been no complaints about the reduction in lighting levels with only a few enquiries upon why this has been carried out.</p>	X
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.</p>	
Stop or amend the	<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>	

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proposed change		
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet	Meeting title: Cabinet Meeting Date: February 2023	

7. Sign-Off

Officers that must approve this decision	
Equalities Lead	Name: Denise McCausland Date: 10 01 2023 Position: Equalities Manager
Director	Name: Steve Iles Position: Director of Sustainable Communities