

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 and Economic Recovery
Title of proposed change	The Redevelopment Purley High Street Carpark and Leisure
Name of Officer carrying out Equality Analysis	Huw Rhys Lewis - Director Commercial Investment & Capital

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

The Cabinet Report seek approval for

1 Approve the draft Heads of Terms between Polaska Assets Limited and the Council – as set out in Part B appendix 1 and delegates authority to the Corporate Director – Sustainable Communities, Regeneration and Economic Recovery and the Director for Commercial Investment and Capital to enter into the Head of Terms (HoT).

2 Delegates authority to the Corporate Director – Sustainable Communities, Regeneration and Economic Recovery and the Director for Commercial investment and Capital to agree in consultation with the Mayor and Cabinet member for Finance the suite of documents required to support these development proposals between Polaska and the Council. These to include a Development Agreement, new head lease, surrender of all existing leases and the agreement of the new underlease for the leisure Centre.

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. 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 Additional information needed to determine impact of proposed change

Table 1 – 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.

Additional information needed	Information source	Date for completion
NONE		

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

3.2 Deciding whether the potential impact is positive or negative

Table 2 – Positive/Negative impact

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

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	The proposed scheme will not directly impact any protected characteristic group.	None	Commercial investment and Asset Management Team
Disability	The proposed scheme will not directly impact any protected characteristic group.	None	As above
Gender	The proposed scheme will not directly impact any protected characteristic group.	None	As above.
Gender Reassignment	The proposed scheme will not directly impact any protected characteristic group.	None	As above.
Marriage or Civil Partnership	The proposed scheme will not directly impact any protected characteristic group.	None	As above.
Religion or belief	The proposed scheme will not directly impact any protected characteristic group.	None	As above.
Race	The proposed scheme will not directly impact any protected characteristic group.	None	As above.
Sexual Orientation	The proposed scheme will not directly impact any protected characteristic group.	None	As above.
Pregnancy or Maternity	The proposed scheme will not directly impact any protected characteristic group.	None	As above.

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.

3.3 Impact scores

Example

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

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

Table 4 – Equality Impact Score

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

Key

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

Equality Analysis

Table 5 – Impact scores

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

Equality Analysis

4. Statutory duties

4.1 Public Sector Duties

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

Advancing equality of opportunity between people who belong to protected groups x

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

Table 5 – 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	N/A	N/A	Huw Rhys Lewis	
Race	N/A	N/A	As above	
Sex (gender)	N/A	N/A	As above	
Gender reassignment	N/A	N/A	As above	
Sexual orientation	N/A	N/A	As above	
Age	N/A	N/A	As above	
Religion or belief	N/A	N/A	As above	
Pregnancy or maternity	N/A	N/A	As above	
Marriage/civil partnership	N/A	N/A	As above	

Equality Analysis

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. The adoption of the Annual Asset Disposal Plan and delegation of decisions will have no direct impact on staff or services delivered. Where necessary individual decisions for the sale or letting of a specific building will fully consider any impact on the service delivery or staff as part of the individual report. This will be particularly pertinent where the relocation of a service is being considered.	X
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form	
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet No.		Meeting title: Decision under special urgency provisions Date: October 26th 2023

Equality Analysis

7. Sign-Off

Officers that must approve this decision			
Equality lead	Name:	Naseer Ahmad	Date: 12/09/2023
	Position:	Interim Equalities Officer	
Director	Name:	Huw Rhys-Lewis	Date:
	Position:	Interim Director Commercial Investment and Capital	

Appendix One: data broken down by Protected Characteristics The information below is taken from the 2011 census unless otherwise indicated.

Age groups Number of people Percentage

0-4 years 27,972 7.7%
 5-7 years 14,388 4.0%
 8-9 years 8,708 2.4%
 10-14 years 23,130 6.4%
 15 years 4,912 1.4%
 16-17 years 9,934 2.7%
 18-19 years 8,720 2.4%
 20-24 years 23,591 6.4%
 25 -29 years 27,692 7.6%
 30-44 years 82,439 22.7%
 45-59 years 70,488 19.4%

Equality Analysis

60-64 years 17,029 4.7%
65-74 years 23,155 6.4%
75-84 years 15,318 4.2%
85-89 years 3,881 1.1%
Over 90 years 2,021 0.6%

People with long term illnesses or disabilities 363,378

Blind or visually impaired These categories were not recorded as such in the 2011 census. However, this did record that there were 24,380 people (6.7%) whose day to day activities were limited a lot by long term Deaf or hearing impaired Other communication impairment Mobility impairment Learning difficulty or disability Mental health condition 21 HIV, multiple sclerosis or cancer illness or disability and 28,733 (7.9%) whose day to day activities were limited a little (Office of National Statistics) Other (please specify)

Gender

Male 176,224 48.5%
Female 187,154 51.5%

Ethnicity

Number of people Percentage White British 171,740 47.3%
White Irish 5,369 1.5%
White Gypsy or Irish Traveller 234 0.1%
Other White background 22,852 6.3%
Black African 28,981 8.0%
Black Caribbean 31,320 8.6%
Other Black background 12,955 3.6%
Bangladeshi 2,570 0.7%
Chinese 3,925 1.1%
Indian 24,660 6.8%
Pakistani 10,865 3.0%
Other Asian background 17,607 4.8%
Mixed White and Black Caribbean 9,650 2.7%

Equality Analysis

Mixed White and Black African 3,279 0.9%
Mixed White and Asian 5,140 1.4%
Other Mixed background 5,826 1.6%
Arab 1,701 0.5%
Other ethnic group (please specify) 4,704 1.3%

Religion

Number of people Percentage Buddhist 2,381 0.70%
Christian 205,022 56.40%
Hindu 21,739 6.00%
Jewish 709 0.20% 22
Muslim 29,513 8.10%
Sikh 1,450 0.40%
No religion/faith 72,654 20.00%
Other (please specify) 2,153 0.60%

Sexual orientation

Lesbian There are no figures from the 2011 census. However, it is estimated that there were 20,370 lesbians, gay men, bisexual and transgender people living in Croydon in 2001. (London LGBT)
Gay Bisexual Transgender Transgender See above

Pregnancy or maternity Pregnant

These categories were not recorded as such in the 2011 census. However, there were 5,720 live births in 2011 (Office of National Statistics) On compulsory maternity leave Marriage or civil partnership Married 122,013 42.9% In civil partnership 796 0.3%