

# 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>Housing</b>
<b>Title of proposed change</b>	<b>HRA Budget &amp; 30 Year Business Plan 2024-25</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)

The 30 year Business Plan sets out for the Housing Revenue Account (HRA) both the capital and revenue investments required for in the Council's housing stock, with more focus is on the medium-term, first five years, as there is more certainty on costs, demands, resources and pressures, which will enable the prioritisation of housing investment, taking into account the Mayor's priorities & the regulatory requirements.

The proposals within the Business Plan are linked to the proposed increase to the HRA rents, which is how the investments are funded and how the Council can continue to invest in the housing stock. It is based on a on a proposed HRA budget for 2024-25 total income of £103m.

The report provides an overview of the impact on tenants of protected characteristic groups by this positive change by increasing the investment to the 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	People will benefit from the overall investment in our council housing stock as a result of the increased budget and the review of the stock conditions.	There is ongoing work in relation to our housing stock condition surveys required. This will be used to inform a more comprehensive Asset Strategy for the stock.	Council tenants have been broken down into the following age groups:

	30-59 y/o tenants constitute 44% of Council tenants (more than any other two age groups combined)		20-29: 4% 30-39: 14% 40-49: 19% 50-59: 25% 60-69: 18% 70-79: 11% 80-89: 6% 90-99: 1%
Disability	There is an ongoing capital investment program for adaptations.	There is ongoing work in relation to our housing stock condition surveys required which will inform whether the proposed budget is sufficient to meet the alterations required.	The Council does not collect disability data on Council tenants. Data collection on protected characteristics of Council tenants will be improved as the implementation of the NEC Housing system is rolled out fully
Sex	People will benefit from the overall investment in our council housing stock as a result of the increased budget and the review of the stock conditions	There is ongoing work in relation to our housing stock condition surveys required. This will be used to inform a more comprehensive Asset Strategy for the stock	The gender of Council tenants is as follows:  Female: 67% Male: 33%
Gender Reassignment	People will benefit from the overall investment in our council housing stock as a result of the increased budget and the review of the stock conditions	There is ongoing work in relation to our housing stock condition surveys required. This will be used to inform a more comprehensive Asset Strategy for the stock	The Council does not collect data on the religion or belief of Council tenants
Marriage or Civil Partnership	People will benefit from the overall investment in our council housing stock as a result of the increased budget and the review of the stock conditions	There is ongoing work in relation to our housing stock condition surveys required. This will be used to inform a more comprehensive Asset Strategy for the stock	
Religion or belief	People will benefit from the overall investment in our council housing stock as a result of the increased budget and the review of the stock conditions	There is ongoing work in relation to our housing stock condition surveys required. This will be used to inform a more comprehensive Asset Strategy for the stock	The Council does not collect data on the religion or belief of Council tenants

Race	People will benefit from the overall investment in our council housing stock as a result of the increased budget and the review of the stock conditions	Any negative impacts listed below will impact more residents identifying as Black or White than those identifying as other ethnic groups.	Council tenants can be broken down into the following ethnicity groups:  Asian: 9% Black: 37% White: 47% Mixed: 4% Other: 3%
Sexual Orientation	People will benefit from the overall investment in our council housing stock as a result of the increased budget and the review of the stock conditions	There is ongoing work in relation to our housing stock condition surveys required. This will be used to inform a more comprehensive Asset Strategy for the stock	The Council does not collect data on the sexual orientation of tenants.
Pregnancy or Maternity	People will benefit from the overall investment in our council housing stock as a result of the increased budget and the review of the stock conditions	There is ongoing work in relation to our housing stock condition surveys required. This will be used to inform a more comprehensive Asset Strategy for the stock	

**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

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Table 3 – Impact scores

Column 1 <b>PROTECTED GROUP</b>	Column 2 <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>	Column 3 <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>	Column 4 <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	2	6
Disability	2	2	4
Sex	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

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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 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

**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
Age	The proposed change is not expected to have a negative impact.	We have increased engagement with engage tenants through existing groups but will continue to seek involvement of minority groups through these channels	Director of Tenancy Services, Housing Resident Engagement & Allocations	An ongoing commitment to developing the engagement is required



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Disability	The proposed change is not expected to have a negative impact.	We have increased engagement with engage tenants through existing groups but will continue to seek involvement of minority groups through these channels	Director of Tenancy Services, Housing Resident Engagement & Allocations	
Sex	The proposed change is not expected to have a negative impact.	We have increased engagement with engage tenants through existing groups but will continue to seek involvement of minority groups through these channels	Director of Tenancy Services, Housing Resident Engagement & Allocations	
Gender reassignment	The proposed change is not expected to have a negative impact.	We have increased engagement with engage tenants through existing groups but will continue to seek involvement of minority groups through these channels	Director of Tenancy Services, Housing Resident Engagement & Allocations	
Marriage / Civil Partnership	The proposed change is not expected to have a negative impact.	We have increased engagement with engage tenants through existing groups but will continue to seek involvement of minority groups through these channels	Director of Tenancy Services, Housing Resident Engagement & Allocations	
Race	The proposed change is not expected to have a negative impact.	We have increased engagement with engage tenants through existing groups but will continue to seek	Director of Tenancy Services, Housing Resident	

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		involvement of minority groups through these channels minority groups through these channels	Engagement & Allocations	
Religion or belief	The proposed change is not expected to have a negative impact.	We have increased engagement with engage tenants through existing groups but will continue to seek involvement of minority groups through these channels	Director of Tenancy Services, Housing Resident Engagement & Allocations	
Sexual Orientation	The proposed change is not expected to have a negative impact.	We have increased engagement with engage tenants through existing groups but will continue to seek involvement of minority groups through these channels	Director of Tenancy Services, Housing Resident Engagement & Allocations	
Pregnancy or maternity	The proposed change is not expected to have a negative impact.	We have increased engagement with engage tenants through existing groups but will continue to seek involvement of minority groups through these channels	Director of Tenancy Services, Housing Resident Engagement & Allocations	

### 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.

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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. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</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>	X
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

Officers that must approve this decision	
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## Equality Analysis

<b>Equalities Lead</b>	<b>Name:</b> Naseer Ahmad / <b>Position:</b> Interim Senior Equalities Officer <b>Date:</b> 2401/2024
<b>Director</b>	<b>Name:</b> <b>Position:</b> <b>Date:</b>

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