

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

Directorate	Sustainable Communities Regeneration & Economic Recovery
Title of proposed change	This is an update of the previous Air Quality Action Plan 2017-2022. The updated Air Quality Delivery Plan will cover from 2024-2029.

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

Air quality is an important public health issue in Croydon, it contributes to reduced life expectancy and disproportionately impacts on the most vulnerable people, in particular the young and elderly.

The aim of the Air Quality Delivery Plan 2023-2029 is to put measures in place to improve the health and wellbeing of everyone living and working in Croydon.

Our key priorities for 2024 – 2029 are:-

- Work towards the 2005 WHO guidelines for PM2.5 with a target of compliance deadline by 2030, and review the emerging policies from the GLA in respect of the 2021 WHO guidelines
- Increase the network of air quality monitoring across the borough;
- Continue to engage schools with the introduction of Croydon Healthy School Streets (this can include, traffic calming measures, Air Quality audits and increase of green infrastructure working with Trees for Cities).
- Ensure enforcement of Non-Road Mobile Machinery (NRMM) air quality policies in Croydon.
- Reduce emissions from wood burning
- Minimise emissions from construction and develop Section 106 guidance for air quality and planning;
- Continue to raise awareness and encourage behaviour changes through air quality campaigns;
- Assess potential impact of installing Ultra-Low Emission Vehicle (ULEV) infrastructure (Increase uptake of electric vehicles and ensure electric vehicle charging infrastructure provision and maintenance keeps pace with growth in Croydon)
- Reduce emissions from wood burning – reduce particulate emissions from wood burning in the home by an awareness campaign
- Develop a Fleet Strategy - address the wider role of Fleet within the services which the Council provides;
- Provide new cycling and walking infrastructure and assess air quality impacts of new infrastructure.

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	Air pollution is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions.	Not applicable	Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006. Defra. Air Pollution: Action in a Changing Climate, March 2010
Disability	Air pollution is recognised as a contributing factor in the onset of heart disease and cancer and particularly affects the most vulnerable in society.	Not applicable	Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006. Defra. Air Pollution: Action in a Changing Climate, March 2010
Sex	It is noted that adverse effects of air pollution seem to be greater in men in lower social classes.	Not applicable	Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006.

Gender Reassignment	Croydon is committed to reducing the exposure of all people in Croydon to poor air quality in order to improve health.	Not applicable	Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006. Defra. Air Pollution: Action in a Changing Climate, March 2010
Marriage or Civil Partnership	Croydon is committed to reducing the exposure of all people in Croydon to poor air quality in order to improve health.	Not applicable	Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006. Defra. Air Pollution: Action in a Changing Climate, March 2010
Religion or belief	Croydon is committed to reducing the exposure of all people in Croydon to poor air quality in order to improve health.	Not applicable	Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006. Defra. Air Pollution: Action in a Changing Climate, March 2010
Race	Research shows that those exposed to the worst air pollution are more likely to be deprived Londoners and from Black, Asian and Minority Ethnic communities.	Not applicable	https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/air-pollution-and-inequalities-london-2019
Sexual Orientation	Croydon is committed to reducing the exposure of all people in Croydon to poor air quality in order to improve health.	Not applicable	Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006. Defra. Air Pollution: Action in a Changing Climate, March 2010
Pregnancy or Maternity	Epidemiological data associates air pollution exposure during pregnancy with adverse outcomes such as preterm birth (<37 weeks of gestation) (11, 12), low birth weight (< 2500 g at birth) (13), miscarriage (14), preeclampsia and hypertensive disorders of pregnancy	Not applicable	Cellular mechanisms linking to outdoor and indoor air pollution damage during pregnancy 2023

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
	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

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	2	1	2
Disability	2	1	2
Sex	2	1	2
Gender reassignment	2	1	2
Marriage / Civil Partnership	2	1	2
Race	2	1	2
Religion or belief	2	1	2
Sexual Orientation	2	1	2
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				
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				
Age				

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Religion or belief				
Pregnancy or maternity				
Marriage/civil partnership				

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. The Air Quality Delivery Plan 2024-2029 requires the Council to take positive steps to tackle the effects of poor air quality in the borough. The measures to be taken will have a positive impact on all communities and there is no group with a protected characteristic that will be negatively impacted by the actions in the plan.	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.	

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Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet	Meeting title: The AQAP will be considered by Cabinet Date: 15 May 2024
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7. Sign-Off

Officers that must approve this decision	
Equalities Lead	Name: Ken Orlukwu Date: 02/05/2024 Position: Senior Equalities Officer
Director	Name: Karen Agbabiaka Date: 2 May 2024 Position: Director of Streets & Environment