

Croydon Council Equality Analysis Form

Stage 1 Initial Risk Assessment - Decide whether a full equality analysis is needed

At this stage, you will review existing information such as national or local research, surveys, feedback from customers, monitoring information and also use the local knowledge that you, your team and staff delivering a service have to identify if the proposed change could affect service users from equality groups that share a “protected characteristic” differently. You will also need to assess if the proposed change will have a broader impact in relation to promoting social inclusion, community cohesion and integration and opportunities to deliver “social value”.

Please note that the term ‘change’ is used here as shorthand for what requires an equality analysis. In practice, the term “change” needs to be understood broadly to embrace the following:

- Policies, strategies and plans
- Projects and programmes
- Commissioning (including re-commissioning and de-commissioning)
- Service Review
- Budgets
- Staff structures (including outsourcing)
- Business transformation programmes
- Organisational change programmes
- Processes (for example thresholds, eligibility, entitlements, and access criteria)

You will also have to consider whether the proposed change will promote equality of opportunity; eliminate discrimination or foster good relations between different groups or lead to inequality and disadvantage. These are the requirements that are set out in the Equality Act 2010.

1.1 Analysing the proposed change

1.1.1 What is the name of the change?

Introduction of the Housing Asset Management Strategy, “Homes, Neighborhoods, Involvement”

1.1.2 Why are you carrying out this change?

Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

Croydon’s Housing Asset Management Strategy has several strategic aims to ensure that we provide:

- Safe, secure and structurally sound homes for our residents.
- Investment in homes is at the right time to reduce demand on the repairs service and maintains high levels of resident satisfaction.
- Improved energy performance of our properties and materials to help reduce fuel poverty and contribute to 2050 carbon reduction targets.
- Investment that supports local area regeneration to make places where people want to be.
- Maintain a balanced Housing Revenue Account.

- Ensure residents are involved in decision making/procurement and developing Council services.

The strategic aims above will focus activities across several services to achieve common goals and improve service delivery to residents of social housing.

The new strategy will align to the objectives set in the Corporate Plan 2018-22. It will encompass the recent changes to legislation and government policy, such as the lifting of the HRA Borrowing Cap, removal of High Value Void Sales, and an end to the 1% Rent Reduction.

1.1.3 What stage is your change at now?

See **Appendix 1** for the main stages at which equality analyses needs to be started or updated.

Review of draft Housing Asset Management Strategy, consulting with internal and external stakeholders. Preparing for cabinet paper.

Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected by the change and how

1.2.1 Who are your internal and external stakeholders?

For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

Internal stakeholders:

- Assets and Involvement service
- Capital Delivery for Homes and Schools service
- Repairs and Maintenance service
- Regeneration service
- Tenancy and Caretaking service
- Growth team
- Finance service
- Councillor Alison Butler, Deputy Leader and Member for Homes
- Hazel Simmonds, Director of Council Housing, Districts and Regeneration
- Yvonne Murray, Director of Housing, Assessment and Solutions
- Steve Iles, Director of Public Realm

External stakeholders:

- Residents of social housing
- Leaseholders in social housing blocks

Planned maintenance and repairs contractor partners:

- Mulalley and Company Limited

- Axis
- Anglian
- AJS
- Guideline
- Clairglow

1.2.2 What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?

The new strategy will provide service officers and managers with strategic direction on service delivery. This will help to ensure that all decisions are aligned with the strategy and provide consistency across services.

Through the HAMS we will seek to provide to residents and leaseholders

- Safe, secure and structurally sound homes
- Investment in homes is at the right time and the right level
- Improved energy performance of our housing stock to help reduce fuel poverty and contribute to 2050 carbon reduction targets.
- Investment that supports local area regeneration to make places where people want to be.
- Ensure residents are involved in decision making/procurement and developing Council services.

Contractor partners will be able to use the strategy to effectively plan and resource based upon the commitment to the objectives outlined in the strategy.

1.2.3 Does your proposed change relate to a service area where there are known or potential equalities issues?

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response If you don't know, you may be able to find more information on the Croydon Observatory (<http://www.croydonobservatory.org/>)

Yes.

The strategy impacts upon those in areas of high levels of deprivation (social inclusion) and those suffering from fuel poverty and social isolation.

According to the Borough Profile 2018 Croydon was the 19th most deprived district authority in the country for barriers to housing and services. (Croydon Observatory).

81% of Council owned homes are in areas of high deprivation (Indices of Multiple Deprivation groups 1-3)¹.

66% of Council owned homes are in areas with higher than the national average levels of fuel poverty².

¹ Croydon Observatory

² 'Annual Fuel Poverty Statistics Report, 2017 (2015 Data)' (Department for Business, Energy & Industrial Strategy, 2017)

1.2.4	<p>Does your proposed change relate to a service area where there are already local or national equality indicators?</p> <p>You can find out from the Equality Strategy http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>
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Yes.

The strategy impacts upon those in areas of high levels of deprivation relating to high barriers to housing and services (social inclusion). In addition, the contracts related to service delivery have key requirements to provide education, training, work experience and job opportunities for local residents (social value).

Will help the Council achieve its Equality objective to increase the support offered to people who find themselves in a position where they are accepted as homeless especially those from BME backgrounds and women.

1.2.5	<p>Analyse and identify the likely <u>advantage</u> or <u>disadvantage</u> associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a “protected characteristic”</p>
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Please see Appendix 2 (section 1) for a full description of groups.

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	<p>A review of sheltered and special sheltered accommodation will take place to ensure that the accommodation meets the needs of residents.</p> <p>Assessment of components used in properties to meet lifetime homes standards. “Homes will be suitable for residents at all stages of life.”</p>	<p>None. There is no proposed reduction in standards or service delivery.</p>
Race/ Ethnicity	<p>None. Property standards and service delivery will be consistent across all race/ethnicity groups.</p>	<p>None. Property standards and service delivery will be consistent across all race/ethnicity groups.</p>
Gender	<p>None. Property standards and service delivery will be consistent across all gender groups.</p>	<p>None. Property standards and service delivery will be consistent across all gender groups.</p>
Transgender	<p>None. Property standards and service delivery will be consistent across all residents, including transgender groups.</p>	<p>None. Property standards and service delivery will be consistent across all residents, including transgender groups.</p>
Age	<p>A review of sheltered and special sheltered accommodation will take place to ensure that the accommodation meets the needs of residents.</p>	<p>None. There is no proposed reduction in standards or service delivery. Digital inclusion: Lack of knowledge or understanding could exclude this group.</p>

	Assessment of components used in properties to meet lifetime homes standards.	Use new and emerging technologies to provide residents with new ways to engage in meetings and give feedback
Religion /Belief	None. Property standards and service delivery will be consistent across all residents, regardless of religious belief.	None. Property standards and service delivery will be consistent across all residents, regardless of religious belief.
Sexual Orientation	None. Property standards and service delivery will be consistent across all residents, regardless of sexual orientation.	None. Property standards and service delivery will be consistent across all residents, regardless of sexual orientation.
Pregnancy and Maternity	None. Property standards and service delivery will be consistent across all residents, regardless of pregnancy and maternity.	None. Property standards and service delivery will be consistent across all residents, regardless of pregnancy and maternity.
Social inclusion issues	The strategy aims to support the provision of good quality, affordable homes across the borough to those in most need. 81% of our Council homes are in areas of high social deprivation (Indices of Multiple Deprivation scales 1-3). The HAMS will improve the condition and energy performance of the homes, will provide safe, decent, and thermally efficient accommodation for residents.	None. Property standards and service delivery will be consistent across all residents.
Community Cohesion Issues	Residents from all cultural backgrounds are encouraged to participate in residents groups. Involvement from underrepresented groups is encouraged. Increased use of digital technology will allow more residents to participate.	None. Residents from all cultural backgrounds are invited to participate in resident groups.
Delivering Social Value	Opportunities for work experience, training, and jobs will be offered to local residents through the social value aspect of the Repairs and Maintenance, and Planned Maintenance contracts. Social Value will help more people into work this will assist the more socially excluded in our community to become financially stable thereby reducing social isolation etc.	None. Residents from across the borough will be offered work experience, training and job opportunities through the contracts.

1.2.6	<p>In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?</p> <p>For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation</p>
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81% of Council owned homes are in areas identified with high levels of social deprivation, (Indices of Multiple Deprivation Decile 1-3). Four Places have large concentrations of social deprivation. These are in Addington, Broad Green & Selhurst, Shirley, and Waddon.

According to the borough profile 2018 Croydon is the bottom third (220th most deprived authority out of 336 district authorities) for the Education, skills and training domain.

Challenges
Croydon became relatively more deprived compared to other local authorities in England between 2010 and 2015.
Although there have been some changes in the individual rankings of LSOAs within the borough there remains geographic inequality in the distribution of deprivation in the borough with the North and South East of the borough remaining more deprived. Croydon was in the 25 most deprived district authorities in the country for the crime domain in 2015 (Croydon Observatory).

Another factor is the diversity of residents taking part in the consultation process, it is widely acknowledged that we need to widen our consultation and engage with a wider cross section of residents, although steps have been taken to increase the diversity of our forums, we are still failing in truly representing the wider local community.

1.2.7	<p>Would your proposed change affect any protected groups more significantly than non-protected groups?</p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....</p>
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Yes, due to the changes set out in the strategy one of the objectives is to ensure wider consultation with sections of the community from the use of technology. This will help to engage with those who have the necessary technology to do so. Although this change may help to engage with different, previously excluded groups, this may also exclude sections of the community that do not have access to this new technology due to poverty, or lack of knowledge.

1.2.8	<p>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who don't?</p> <p>In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes <i>etc.</i></p> <p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.</p>
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Yes, in part, but due to the inherent nature of the current Planned Maintenance programme /Asset Management strategy the future planning focuses on the council property and not on the resident, or their circumstances, therefore the service that is received is solely based on the condition of the property and this means that any change to the service will not help or hinder any people who belong to any of the protected groups.

Although that being said, if we consider the wider aims of the Asset Management strategy and the Corporate objectives set out in the Corporate Plan there maybe some disadvantage to historically excluded groups in the way that in the past the diversity of residents being consulted with has been limited. Recent attempts to increase the diversity of residents involved in resident focus groups has failed to materialise into new recruits and to give a complete representative picture from a cross section of the local community. Some new members have been recruited to the Tenant & Leaseholder panel but further work is required to ensure a wider spectrum of participants are included.

1.2.9 As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?

In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

No, the housing asset management strategy (HAMS) will not eliminate discrimination, harassment and victimisation, although it hopes to widen consultation and enable members of the community & resident consultation forums feel more involved, more informed about what is going and the reasons why. The consultation process itself, the act of residents and leaseholders joining a group and working together for the common good, should help to break down barriers and enable genuine communication between different protected groups, i.e. age, ethnicity, gender etc. and in this way reduce discrimination in the wider community, thereby helping community cohesion.

1.2.10 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?

In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

Yes, the Housing Asset Management Strategy aims to help remove the stigma attached to social housing by improving the health, wellbeing and opportunities for all social housing residents. . The consultation process itself, the act of residents and leaseholders joining a group and working alongside one another for a common purpose, should help to break down barriers and enable real

dialogue between different protected groups, i.e. age, ethnicity, gender etc. and in this way foster good relations and reduce suspicion in the wider community, thereby helping with community cohesion.

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	<p>Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report used in decision making, such as a Cabinet report</p>	<p>No further analysis is required as the HAMS will mostly have a positive impact. Any consultation will endeavour to be as inclusive as possible. If any equalities issues arise as part of the consultation process, the EQIA will be updated to reflect this.</p>
Yes, further equality analysis is required	<p>Please state why and outline the information that you used to make this decision. Also indicate</p> <ul style="list-style-type: none"> • When you expect to start your full equality analysis • The deadline by which it needs to be completed (for example, the date of submission to Cabinet) • Where and when you expect to publish this analysis (for example, on the council website). <p>You must include this statement in any report used in decision making, such as a Cabinet report.</p>	
Officers that must approve this decision	Name and position	Date
Report author	Robert Hunt - Asset Manager	21.11.18
Director		

1.4 Feedback on Equality Analysis (Stage 1)

Please seek feedback from the corporate equality and inclusion team and your departmental lead for equality (the Strategy and Planning Manager / Officer)

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Name of Officer	Yvonne Okiyo	
Date received by Officer	21.11.18	Please send an acknowledgement
Should a full equality analysis be carried out?	No	The change or review will not have a different / significant impact on groups that share a protected characteristic (compared to non-protected groups)

Stage 2 Use of evidence and consultation to identify and analyse the impact of the change

Use of data, research and consultation to identify and analyse the probable impact of the proposed change

This stage focuses on the use of existing data, research, consultation, satisfaction surveys and monitoring data to predict the likely impact of proposed change on customers from diverse communities or groups that may share a protected characteristic.

Please see Appendix 2 (section 2) for further information.

2.1	<p>Please list the documents that you have considered as a part of the equality analysis review to enable a reasonable assessment of the impact to be made and summarise the key findings.</p> <p>This section should include consultation data and desk top research (both local and national quantitative and qualitative data) and a summary of the key findings.</p>
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<p>Croydon Observatory 2018 Borough Profile Corporate Plan 2018-2022</p>
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2.2	<p>Please complete the table below to describe what the analysis, consultation, data collection and research that you have conducted indicates about the probable impact on customers or staff from various groups that share a protected characteristic.</p>
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Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source

2.3 Are there any gaps in information or evidence missing in the consultation, data collection or research that you currently have on the impact of the proposed change on different groups or communities that share a protected characteristic? If so, how will you address this?

Please read the corporate public consultation guidelines before you begin:
<http://intranet.croydon.net/finance/customerservices/customerserviceprogramme/stepbystepguide.asp>.

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2.4 If you really cannot gather any useful information in time, then note its absence as a potential disadvantageous impact and describe the action you will take to gather it.

Please complete the table below to set out how will you gather the missing evidence and make an informed decision. Insert new rows as required.

Group's with a "Protected characteristic" and broader community issues	Missing information and description of potential disadvantageous impact	Proposed action to gather information

Stage 3 Improvement plan

Actions to address any potential disadvantageous impact related to the proposed change

This stage focuses on describing in more detail the likely disadvantageous impact of the proposed change for specific groups that may share a protected characteristic and how you intend to address the probable risks that you have identified stages 1 and 2.

3.1 Please use the section below to define the steps you will take to minimise or mitigate any likely adverse impact of the proposed change on specific groups that may share a protected characteristic.

Equality Group (Protected Characteristic)	Potential disadvantage or negative impact e	Action required to address issue or minimise adverse impact	Action Owner	Date for completing action
Ethnicity/age/gender	Although attempts have been made to engage with a wide representative section of local community there are still improvements to be made.	A variety of methods of consultation needs to be pursued in order to gain the widest possible engagement. This could be online forums/webinars for younger working-age residents that are “time-poor” and physical meetings for the more mature, retired residents who may not be so technologically capable.	Rob Hunt	Ongoing

3.2 How will you ensure that the above actions are integrated into relevant annual department or team service plans and the improvements are monitored?

3.3 How will you share information on the findings of the equality analysis with customers, staff and other stakeholders?

Section 4 Decision on the proposed change

4.1 Based on the information in sections 1-3 of the equality analysis, what decision are you going to take?

Decision	Definition	Yes / No
We will not make any major amendments to the proposed change because it already includes all appropriate actions.	Our assessment shows that there is no potential for discrimination, harassment or victimisation and that our proposed change already includes all appropriate actions to advance equality and foster good relations between groups.	YES
We will adjust the proposed change.	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change. We are going to take action to make sure these opportunities are realised.	
We will continue with the proposed change as planned because it will be within the law.	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed 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.	
We will stop the proposed change.	The proposed change would have adverse effects on one or more protected groups that are not justified and cannot be lessened. It would lead to unlawful discrimination and must not go ahead.	

4.2 Does this equality analysis have to be considered at a scheduled meeting?
If so, please give the name and date of the meeting.

No

4.3 When and where will this equality analysis be published?
An equality analysis should be published alongside the policy or decision it is part of. As well as this, the equality assessment could be made available externally at various points of delivering the change. This will often mean publishing your equality analysis before the change is finalised, thereby enabling people to engage with you on your findings.

4.4 When will you update this equality analysis?
Please state at what stage of your proposed change you will do this and when you expect this update to take place. If you are not planning to update this analysis, say why not

4.5 Please seek formal sign of the decision from Director for this equality analysis?
This confirms that the information in sections 1-4 of the equality analysis is accurate, Comprehensive and up-to-date.

Officers that must approve this decision	Name and position	Date
Head of Service / Lead on equality analysis		
Director		

Email this completed form to equalityandinclusion@croydon.gov.uk, together with an email trail showing that the director is satisfied with it.