

# Equality Analysis Form

Delivering for Croydon

**CROYDON**  
[www.croydon.gov.uk](http://www.croydon.gov.uk)

## 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>SCRER</b>
<b>Title of proposed change</b>	<b>Reinstatement of Graffiti service</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Daniel Shepherd</b>

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

It is proposed to reinstate the Graffiti cleaning service within the borough.

The graffiti service was reduced in 2020/21 as result of the serious governance and financial challenges that Croydon Council faced and formed part of the financial recovery agreed in the first phase of the Croydon Renewal Plan. The service was reduced to focus on offensive graffiti only from both public and private land. In the year before the service reduction, the service removed approximately 12,000 items of graffiti, with 262 of these being classed as 'offensive' graffiti.

Tackling graffiti is a growing problem across the borough with an urgent need to reduce the negative impact it has on local areas and quality of life for residents and businesses.

Linked to this report are plans to increase resources to tackle unwelcome, antisocial, and offensive graffiti. This will allow graffiti enforcement and removal resources to focus on where they are needed, to improve local environmental quality, help reduce fear of crime and increase resident satisfaction.

## 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	<p>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior. Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p>	<p>Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.</p>	<p>Draft Graffiti Policy In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti. <a href="https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf">https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf</a> Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p> <p>ONS 2022</p> <ul style="list-style-type: none"> <li>• 97,900 0-19 year olds. This is the highest in London. (2021 Census)</li> <li>• 239,700 20-64 year olds. This is the highest in London. (2021 Census)</li> <li>• 53,100 65+ year olds. This is the 3<sup>rd</sup> highest in London. (2021 Census)</li> </ul>
Disability	<p>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior. Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a</p>	<p>Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.</p>	<p>Draft Graffiti Policy In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti. <a href="https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf">https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf</a> Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p>

	graffiti free environment will help people feel safe.		Census 2011 tells us that 6.7% of Croydon residents have their day-to day activities limited a lot
Sex	<p>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior.</p> <p>Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p>	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	<p>Draft Graffiti Policy</p> <p>In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti.</p> <p><a href="https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf">https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf</a> Page 19</p> <p>Also, see page 21 of the same report where the survey of women and girls suggests that there is a higher % of women and girls who feel less safe in the areas where they are resident.</p> <p>If we look at perception of safety of where people live, then in the same 12.4% say a bit unsafe, and 4.5% Not safe at all.</p> <p>When broken down by women and girls P21), this increases to "a bit unsafe 37.1%", and "not safe at all 13.2%".</p> <p>ONS 2021</p> <p>(51.9%) residents in Croydon are female and 187,800 are male (48.1%)</p>
Gender Reassignment Identity	The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	<p>Draft Graffiti Policy</p> <p>In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti.</p>

	<p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior. Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p>		<p><a href="https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf">https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf</a> Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p> <p>No borough data at this time N/A Data unavailable until end 2022</p>
<p>Marriage or Civil Partnership</p>	<p>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior. Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p>	<p>Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.</p>	<p>Draft Graffiti Policy</p> <p>In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti.</p> <p><a href="https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf">https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf</a> Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p> <p>The borough data on marital status is as follows: 43% married, 39% single, 11% divorced or separated.</p> <p>In 2011, 796 people in Croydon were in a registered same-sex civil partnership. This was 0.3% of the 16+ population.</p> <p>ONS 2021</p>

<p>Religion or belief</p>	<p>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior.</p> <p>Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p>	<p>Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.</p>	<p>Draft Graffiti Policy</p> <p>In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti.</p> <p><a href="https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf">https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf</a> Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p> <p>Census 2011 data tells us that 56.4% of Croydon residents are Christian, 8.1% Muslim, 6% Hindu , 20% have no religion, and 7.6% did not state a religion</p>
<p>Race</p>	<p>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior.</p> <p>Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p>	<p>Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.</p>	<p>Draft Graffiti Policy</p> <p>In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti.</p> <p><a href="https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf">https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf</a> Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p> <p>GLA 2015, and gov.uk current data</p> <p>GLA 2105 data states that 54% of Croydon residents describe themselves as ethnic minority/mixed.</p>

Sexual Orientation	<p>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior. Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p>	<p>Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.</p>	<p>Draft Graffiti Policy In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti. <a href="https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf">https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf</a> Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p> <p>We do not currently collect data on this characteristic, a working party has been developed to improve data collection.</p>
Pregnancy or Maternity	<p>The reinstatement of the Graffiti removal service is intended to reduce illegal, antisocial and offensive graffiti from the borough and protect street art, which can positively contribute to the appearance of an area, attract visitors and is good for business.</p> <p>It is said that graffiti, creating a negative perception of an area, contributes to people's fear of crime and increase worries about anti-social behavior. Removing and reducing graffiti and protecting street art will give a positive impact on not only the residents near the hotspots but businesses, visitors, those who work and study in the borough, as a graffiti free environment will help people feel safe.</p>	<p>Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.</p>	<p>Draft Graffiti Policy In the year 2019/20 the Environmental Response team removed approximately 12,000 items of graffiti. <a href="https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf">https://www.croydonobservatory.org/wp-content/uploads/2022/01/Community-Safety-Strategy-2022-24.pdf</a> Page 19</p> <p>There is no data on perceptions of safety or instances of graffiti relating to this characteristic</p> <p>There were 5,252 births in Croydon in 2020.</p>

**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:

<b>Additional information needed and or Consultation Findings</b>	<b>Information source</b>	<b>Date for completion</b>
<b>No further consultation required</b>	<b>N/A</b>	<b>N/A</b>

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

<b>Risk Index</b>	<b>Risk Magnitude</b>
6 – 9	High
3 – 5	Medium
1 – 3	Low

**Table 3 – Impact scores**

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

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	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A
Race	Artistic right to expression may be taken away, however the Council's	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A

## Equality Analysis

	policy sets out an approach to Street Art where such art is agreed.			
Sex	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A
Gender reassignment identity	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A
Sexual orientation	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A
Age	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A
Religion or belief	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A
Pregnancy or maternity	Artistic right to expression may be taken away, however the Council's policy sets out an approach to Street Art where such art is agreed.	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A
Marriage/civil partnership	Artistic right to expression may be taken away, however the Council's	Street Art to be agreed in line with the Council's Graffiti policy.	Unknown	N/A

## Equality Analysis

	policy sets out an approach to Street Art where such art is agreed.			
--	---	--	--	--

### 6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter <b>X</b> in column 3 ( <b>Conclusion</b> ) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	<p>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></p> <p>The intention is to reinstate the graffiti cleaning service, borough-wide. It will be available to all sections of community, and will be the same service to all.</p>	x
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. <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></p>	
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. <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></p>	
Stop or amend the proposed change	<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>	
Will this decision be considered at a scheduled meeting? Cabinet		Meeting title: Cabinet

	Date:12/10/22
--	---------------

## 7. Sign-Off

Officers that must approve this decision		
Equalities Lead	<b>Name: Denise McCausland</b> <b>Position: Equality Programme Manager</b>	<b>Date: 25 August 2022</b>
Director	<b>Name: Steve Iles</b> <b>Position: Director of Sustainable Communities</b>	<b>Date: 29<sup>th</sup> September 2022</b>

