

# Equality Analysis Form

Delivering for Croydon

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# 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>Future of Regina Road</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Katherine Monk</b>

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

The Regina Road estate was developed as social housing by the Borough in the mid-1960s. It includes three 11-storey tower blocks built using the Wates Large Panel System (LPS), each with 44 flats. There are four medium-rise blocks close to the tower blocks, with an additional 48 flats, within the wider estate of mainly two-storey housing. There is also some green space, a play area and a kindergarten that should be considered as part of any redevelopment and re-provision.

The flats in the tower blocks – particularly in nos 1-87 - have suffered in recent years from a variety of issues including water penetration, condensation and mould that have proved difficult to rectify. The council is proposing to begin the process of addressing the current unsatisfactory situation at the Regina Road estate where three ageing tower blocks require radical action to ensure modern social housing fit for the 21<sup>st</sup> Century. In summary, improved living conditions at the blocks would involve either refurbishment or redevelopment, and a report considering the options open to the council is to be presented to Cabinet in September 2022.

It is a legal requirement under Section 105 of the Housing Act and a legal requirement as part of the Building Safety Act 2021 to ‘develop a Resident Engagement Strategy so residents can influence and are involved in decisions regarding building safety, are informed of their rights and of their obligations, have clear reporting arrangements for building safety concerns, and a clear escalation process for all residents’. Since July 2018 the GLA has required any landlord seeking GLA funding for estate regeneration projects which involve the demolition of any social homes (and the construction of 150 or more homes of any tenure) to show that residents have supported their proposals through a ballot. This is to make sure that GLA funding only supports estate regeneration projects if residents have a clear say in plans and support them going ahead.

Subject to Cabinet, next steps include exploring options for the future of the Regina Road estate with all the residents affected.

### 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**

	<p>Regina Road is home to a wide range of residents, including families, aging residents and a mix of backgrounds, needs and ethnicities. The data we hold about residents living on the estate regarding protected characteristics is not complete and so it is not currently possible to paint an accurate picture of the extent to which residents share a protected characteristic.</p>
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The Council has undertaken a series of actions since March 2021 to address the concerns of residents and try to start to re-build trust and relationships with residents on the estate. A team of housing officers spoke to residents at the door to get an understanding of the issues residents were experiencing in their homes. A number of meetings - to which all residents were invited - have taken place and a drop-in has been operational since September 2021. A regular newsletter and bulletin for Regina Road is produced for residents. These contain contact details for key housing officers for Regina Road, ways to get involved, and who to talk to if there are problems. Noticeboards are updated with new information and bulletins as they are published.

A reference group was also formed at the beginning of 2022 consisting of a small group of residents representing all three blocks on the estate. It was created to support and engage with residents about repairs, works and improvements taking place at Regina Road over the short, medium and looking ahead to the future.

A Walkabout was held with residents of the three tower blocks during the evening of Wednesday, 13 July 2022. Main issues raised were repair issues, some dating back several years and related to general whole block fabric/service failures which re-occur. Residents present understood the difficulties associated with blocks nearly 60 years old and said they would appreciate new homes in preference to the continuous process of patching old

homes. Some residents said they would be happy to move away from Regina Road. A Walkabout Action Plan has been prepared which follows up on all the issues raised by residents to ensure progress and resolution.

Further meetings are being held with residents to listen to their views, starting with residents of the medium-rise blocks adjacent to nos 1-87.

We do not have any data currently which would tell us whether groups that share a protected characteristic (compared to non-protected groups have a better or worse experience of housing services at Regina Road. We do have some data for a small percentage of our customers following an engagement exercise carried out in Summer 2021 but this exercise took place across the borough and is worth consideration in this analysis.

Although we do not hold information about the protected characteristics of residents in these blocks, what we do know in no uncertain terms is that the poor living conditions at Regina Road – and ongoing issues in the flats – are ongoing and continue to impact on the quality of life for many residents living in these blocks. The impact of poor housing is well documented and evidence of this for some protected characteristics groups is provided in the section below.

(Statistics documenting protected characteristics in the borough of Croydon, and available information about our residents is documented in Appendix 1.)

It is anticipated that the overall impact of the proposal to either refurbish or redevelop on the Regina Road estate will improve the living conditions and their experience of Croydon housing services, for most if not all residents living there. The aim is for this improvement to be experienced by all residents, including those within protected characteristic groups.

The intensive and rigorous consultation process which is required for a programme of this scale, will enable us to clarify the needs of the diverse group of residents living on the estate and is an opportunity to identify improvements that could be made. Listening to residents will help us to understand and address any equalities issues which arise during the consultation process. This EQIA will be updated to reflect this as engagement with residents gains pace.

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	Data obtained to date through outreach
Age	<p>Residents of all ages should benefit from the proposed scheme as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services. Other benefits will be documented as the consultation process is developed and implemented.</p> <p>Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities.</p>	None anticipated.	No clear data to evidence positive or negative impact on age but feedback from an engagement exercise in 2021 shows that females were less happy with their overall experience as a tenant/leaseholder with 28% finding the service excellent/good compared with 34% of males. 38% of females reported their experience to be poor/very poor compared with 32% males. The (small) youngest group surveyed appeared to be the most satisfied and least dissatisfied and the mid-age range groups appeared to be slightly more dissatisfied. However, there didn't appear to be any clear conclusions to be drawn from this demographic breakdown, with satisfaction levels fluctuating across the age ranges.	<p>We have obtained the following data through outreach activity on the estate to date:</p> <p>Elderly (65+): 16%            Under (&lt;65+) 72%            prefer not to say: 13%</p>

	<p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents with of all ages.</p> <p>.</p>			
Disability	<p>Residents with disabilities should benefit from the proposed scheme as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services, including residents in need of adaptations as a result of a disability. Other benefits will be documented as the consultation process is developed and implemented.</p> <p>Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities</p>	None anticipated.	<p>Ref 1) Housing for older and disabled people, <a href="#">Department for Levelling Up, Housing and Communities</a>.</p> <p>Feedback from an engagement exercise in 2021 showed that satisfaction and dissatisfaction levels appear to be fairly consistent between those who did not state their day to day activities were limited because of a health problem or disability and those who did. The small 'unknown' group, who did not provide an answer to this question, showed greater dissatisfaction with their overall experience.</p>	<p>We have obtained the following data through outreach activity on the estate to date:</p> <p><b>Disability</b>  Yes 21%  No 12%  Undisclosed 67%</p>

	<p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents with disabilities.</p>			
<p>Sex</p>	<p>Residents should benefit from the proposed scheme regardless of their sex as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services. Other benefits will be documented as the consultation process is developed and implemented. Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities</p>	<p>None anticipated.</p>	<p>Feedback from an engagement exercise in 2021 showed that females were less happy with their overall experience as a tenant/leaseholder with 28% finding the service excellent/good compared with 34% of males. 38% of females reported their experience to be poor/very poor compared with 32% males.</p>	<p>We have obtained the following data through outreach activity on the estate to date:</p> <p><b>Male: 22%</b>  <b>Female: 78%</b>  <b>Prefer not to say/other: 0%</b></p>



	<p>Pledge as the Council's standard in equalities.</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents of any sex.</p>			
Gender Identity	<p>None anticipated. Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities.</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents.</p>		No data to evidence positive or negative impact on gender reassignment	Further data to be identified through ongoing outreach.

<p>Marriage or Civil Partnership</p>	<p>Residents should benefit from the proposed scheme regardless of marriage or civil partnership groups as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services.</p> <p>Other benefits will be documented as the consultation process is developed and implemented.</p> <p>Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities.</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on</p>	<p>None anticipated.</p>	<p>No data to evidence positive or negative impact on marriage or civil partnership.</p>	<p>Further data to be identified through ongoing outreach.</p>
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	the estate embrace the needs of residents.			
Religion or belief	<p>Residents should benefit from the proposed scheme regardless of their religion or belief group, as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services.</p> <p>Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents.</p>	None anticipated.	Currently no data to evidence positive or negative impact on religion or belief groups.	<b>Religion/belief</b> Muslim : 1% Christian : 2% Other : 1% Not Known: 96 %

	<p>Other benefits will be documented as the consultation process is developed and implemented.</p>			
<p>Race</p>	<p>Residents should benefit from the proposed scheme regardless of their race, as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services.</p> <p>Other benefits will be documented as the consultation process is developed and implemented.</p> <p>Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on</p>	<p>None anticipated.</p>	<p>Feedback from an engagement exercise in 2021 showed that whilst around 35% of White, Asian and other groups rated their experience of housing services as excellent or good, this was true of only 25% of Black residents and less than 20% of those in the Mixed/Multiple ethnicity group. There was also increased dissatisfaction amongst Black, Mixed/Multiple and Other groups – all around 41%, 10 points higher than the White group at 31%. These figures relate to housing services in general. The ARK report, commissioned by the council following unacceptable living conditions of some of our tenants at Regina Road, investigated allegations of discrimination on race ground. The report published in May 2021 concluded that it did not find evidence of this allegation.</p>	<p>We have obtained the following data through outreach activity on the estate to date:</p> <p><b>Asian background:</b> 7%  <b>White background):</b> 22%  <b>Black</b>  <b>British/Caribbean/African:</b> 47%  <b>Mixed multiple:</b> 17%  <b>Other ethnic group:</b> 9%  <b>Prefer not to say/undisclosed:</b> 5%</p>

	<p>the estate embrace the needs of residents.</p>			
<p>Sexual Orientation</p>	<p>Residents should benefit from the proposed scheme regardless of their sexual orientation, as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services.</p> <p>Other benefits will be documented as the consultation process is developed and implemented.</p> <p>Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation</p>	<p>None anticipated.</p>	<p>No clear data to evidence positive or negative impact on age but feedback from an engagement exercise in 2021 shows that females were less happy with their overall experience as a tenant/leaseholder with 28% finding the service excellent/good compared with 34% of males. 38% of females reported their experience to be poor/very poor compared with 32% males. The (small) youngest group surveyed appeared to be the most satisfied and least dissatisfied and the mid-age range groups appeared to be slightly more dissatisfied. However, there didn't appear to be any clear conclusions to be drawn from this demographic breakdown, with satisfaction levels fluctuating across the age ranges.</p>	<p>We have obtained the following data through outreach activity on the estate to date:</p> <p><b>Bisexual 0%</b>  <b>Heterosexual/straight 68%</b>  <b>Homosexual 0%</b>  <b>Prefer not to say/undisclosed 32%</b>  <b>Other 0%</b></p>

	<p>process so that future changes on the estate embrace the needs of residents.</p>			
<p>Delivering Social Value</p>	<p>Once the future of Regina Road is determined through consultation with residents, the council would work to ensure social value provided by contractors helps more people into work This will assist the more socially excluded in our community to become financially stable thereby reducing social isolation etc. Opportunities for work experience, training, and jobs will be offered to local residents through the social value aspect of any refurbishment or redevelopment scheme.</p>	<p>None. The council will explore opportunities for local residents, including work experience, training and job opportunities. The council will encourage the successful contractor to adhere to and sign up to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities. This commitment to delivering social value supports the council's <a href="#">Community Sector strategy 2019-2023</a> and the <a href="#">Equality Strategy for Croydon 2020-2024</a> to help Croydon become a more equal place through by tackling poverty, gaps in equality and inequality</p>	<p>Social value element of any refurbishment or redevelopment scheme. contract will ensure these benefits are delivered.</p>	<p>Ref 1) Housing for older and disabled people, <a href="#">Department for Levelling Up, Housing and Communities</a>.</p> <p>Feedback from an engagement exercise in 2021 showed that satisfaction and dissatisfaction levels appear to be fairly consistent between those who did not state their day to day activities were limited because of a health problem or disability and those who did. The small 'unknown' group, who did not provide an answer to this question, showed greater dissatisfaction with their overall experience.</p>
<p><b>Important note:</b> 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.</p>				

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
<ul style="list-style-type: none"> <li>Review data we hold about the protected characteristics of our customers at Regina Road cross-departmentally.</li> <li><b>Update 14 March 2023:</b> Privacy statements were prepared and approved to request information about protected characteristics and this has been built into the resident engagement plan as the project progresses. Although we have been able to collect some equalities information and protected characteristics, as detailed in the breakdown in the next page, we will need to continue to collect information through additional engagement opportunities, such as the housing needs assessment.</li> </ul>	Social care services, major adaptations team, tenancy services, allocations, outreach team	Ongoing
<ul style="list-style-type: none"> <li>Review how and what information will be collected once new IT system is implemented to enable us to analyse customer satisfaction levels across protected characteristics.</li> </ul> <p><b>Update 14 March 2023:</b> Reviewing collection of protected characteristics and equalities information as part of preparation for rollout of Housing Online (NEC)</p>	NEC project documentation	May 2023
<ul style="list-style-type: none"> <li>Consider how to analyse customer satisfaction by protected characteristics as part of ongoing contract monitoring.</li> </ul> <p><b>Update 14 March 2023:</b> Once the contractors have been formally announced, they will be asked to formally sign up to the George Floyd Race Matters Pledge and Equalities Pledge as the council's standard in equalities. The same applies to the council's support of the Stop Social Housing Stigma Campaign and the Residents' Charter, which was formally adopted in December 2022.</p>	Procurement development best practice, 2022 Equalities Pledge	During mobilization From March to August 23

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|--|--|--|
| <ul style="list-style-type: none"><li>• Recruitment is underway to recruit a diverse group of residents to be involved in monitoring the performance of the new contractors once in place so we can monitor whether all residents are equally able to access services.</li></ul> |  |  |
|--|--|--|



<b>Ethnicity</b>	
Asian background	8%
White background	19%
Black British/Caribbean/African	48%
Mixed multiple	8%
Other ethnic group	8%
Prefer not to say/non disclosure	8%
<b>*Rounded to the nearest decimal point</b>	
<b>Disability</b>	
Yes	29%
No	16%
Non disclosure	55%
<b>Sexual orientation</b>	
Bisexual	0%
Heterosexual/Straight	70%
Homosexual	0%
Prefer not to say/non disclosure	29%
Other	1%
<b>Gender</b>	
Male	27%
Female	72%
Prefer not to say/Other	1%
<b>Other (Tenants/leaseholders)</b>	
Elderly (65+)	13%
Under (<65+)	74%
prefer not to say/ undisclosed	13%
<b>Religion/belief</b>	
Muslim	8%
Christian	2%
Other	2%
Not Known	83%
Prefer not to say	5%

<b>Tenure</b>	
Freeholder	2%
Leaseholder	12%
Secure tenants	80%
Temporary Accommodation resident	5%
Not known	1%

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

# Equality Analysis

**Table 3 – Impact scores**

<p><b>Column 1</b></p> <p><b>PROTECTED GROUP</b></p>	<p><b>Column 2</b></p> <p><b>LIKELIHOOD OF IMPACT SCORE</b></p> <p>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.</p> <p><b>1 = Unlikely to impact</b>  <b>2 = Likely to impact</b>  <b>3 = Certain to impact</b></p>	<p><b>Column 3</b></p> <p><b>SEVERITY OF IMPACT SCORE</b></p> <p>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.</p> <p><b>1 = Unlikely to impact</b>  <b>2 = Likely to impact</b>  <b>3 = Certain to impact</b></p>	<p><b>Column 4</b></p> <p><b>EQUALITY IMPACT SCORE</b></p> <p>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.</p> <p><b>Equality impact score = likelihood of impact score x severity of impact score.</b></p>
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

## 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.

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## 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	None anticipated			
Race	None anticipated			
Sex (gender)	None anticipated			
Gender reassignment	None anticipated			
Sexual orientation	None anticipated			
Age	None anticipated			
Religion or belief	None anticipated			
Pregnancy or maternity	None anticipated			
Marriage/civil partnership	None anticipated			

## 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

## Equality Analysis

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> Engaging with residents about the options for the future of Regina Road is an opportunity to ensure that homes for those living on these sites are fit for purpose and provide equal and equally accessible housing provision and services across all protected characteristics. The consultation has been an opportunity to make significant enhancements in these areas where provision is currently lacking. We have facilitated consultation in a variety of methods (online, face to face, independent advisors) so that all residents are able to contribute. We have also offered to provide consultation materials in different formats or languages if required.	<b>Yes</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>	<b>No</b>
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>	<b>No</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.	<b>No</b>
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Date:

## 7. Sign-Off

<b>Officers that must approve this decision</b>		
<b>Equalities Lead</b>	<b>Name:</b>	<b>Date:</b>
	<b>Position:</b>	
<b>Director</b>	<b>Name:</b>	<b>Date:</b>
	<b>Position:</b>	

### Appendix 1

Croydon Council has a social housing stock of approximately 13,500 properties (61% flats, 39% street properties). In addition, there are also approximately 2,500 leaseholders. The information we hold about our residents in relation to protected characteristics is incomplete. Whilst we have insight into the age, sex and race / ethnicity of our tenants and leaseholders, information in relation to disability, sexual orientation and other protected characteristics is not available to us. Therefore, we need to draw on data that is available via Croydon Observatory to draw some conclusions about the profile of residents living in our homes.

#### Age

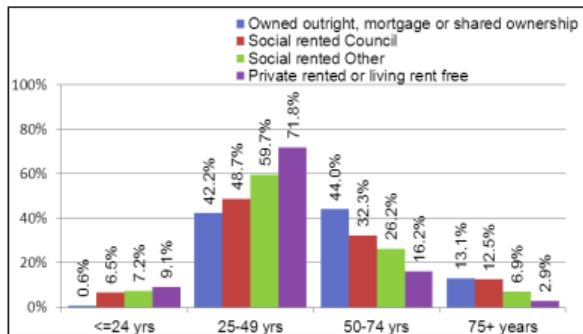
We know the age of 95% of our customers (13607/14345). The majority of the missing 5% are tenancies held for many years (going back to early 1970's) so are most likely to be older/elderly. We know that 4.4% are aged between are 20-29, 15.6% are 30-39, 19.4% 40-49

<b>Age</b>	20-29	30-39	40-49	50-59	60-69	70-79	80+
<b>%</b>	4.4%	15.6%	19.4%	25.0%	17.7%	10.8%	7.1%



## Equality Analysis

Figure 1 - Tenure type by age bands in Croydon in 2011



Source: ONS, Census 2011, Table DC4201EW

Figure 1 - Tenure type by age bands in Croydon in 2011 Source: ONS, Census 2011, Table DC4201EW.

### Race

We know the ethnicity of 78.3% of our customers (11236/14345). Again, where there are gaps, these are for the longer held tenancies.

Ethnicity	Asian	Black	Mixed/multiple	White	Other
%	9.2%	37.9%	4.2%	46.2%	2.5%

The Croydon population continues to grow from long-term international migration and 34.6% of the population is made up of non-UK born residents according to ONS 2020 estimates. Croydon has a higher proportion of residents from Asian/Asian British, mixed or multiple ethnic groups, Black/African/Caribbean/Black British and other ethnic groups compared to the national average. proportion of Asian and Black residents in Croydon has been increasing since the 2011 Census. The proportion of White population was predicted to decrease by almost 10% by 2021.

Source: GLA 2016 Housing-led projections by ethnicity.

### Gender

Records are held for 14343/14345 = 99.99% of our customers as follows:

Female	67.0%
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## Equality Analysis

Male	33.0%
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### Disability

We hold disability information for housing applicants and for council tenants but much of this data is held in “free text” fields making it difficult to analyse and is not easily extractable from our housing tenant database. Currently we This figure accounts for just 5% of our customers. Looking to other data for insight there is not one comprehensive figure that can give a true picture of the total number of people with a disability in Croydon. The 2011 Census figures showed that 14.1% of the population in Croydon had their day-to-day activities limited to some extent by a long-term health problem or disability. 22,493 people had their day-to-day activities limited a lot, whilst 28,134 had their day-to-day activities limited a little.

We know that since 2008, our major adaptations team in housing have carried out 1556 adaptations to council properties. On top of that figure would be any level access showers installed via the decent homes program, plus any adaptations carried out before 2008.

### Social value

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. Social housing is often associated with the council’s more deprived residents, so social value can provide key benefits to this group of residents in a number of ways, including: employment opportunities for local and disadvantage people, improved skills for local people or those facing barriers to employment and improved employability of young people.

### Deprivation

There remains geographic inequality in the distribution of deprivation in the borough with the North and East of the borough remaining more deprived than the South. Ref [Borough Profile \(croydonobservatory.org\)](http://croydonobservatory.org) Dec 2021 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.

### Sexuality

We have significant gaps in our data concerning sexual orientation in respect of council tenants, housing applicants and homeless households. Equality and Human Rights Commission guidance on this protected characteristic is to collect it where relevant, ONS produced its Integrated Household Survey for the calendar year of 2014 with its mid-year population estimates. By applying the London average to the Croydon population it was estimated that there were about 9,800 people in Croydon who would have identified as being gay, lesbian or bisexual.

## Equality Analysis

### **Social deprivation**

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.

### **Working adults**

Based on the ONS annual population survey for the calendar year 2020, only 5.0% of Croydon's resident population aged 16-64 years had no qualification. Adults from a White ethnic background in Croydon in the 2011 Census were more likely to have no qualifications than adults from any other ethnic background. Over a half (51.4%) of the residents from the Asian community had level 3 and level 4 qualifications which was the highest proportion compared to the other ethnic communities.

### **Housing**

According to the 2011 Census, 60% of all Croydon 145,000 households were owner occupied, 20% were private rented and 18% were households living in social housing. Social housing in Croydon is mainly concentrated in the northern parts and the eastern edge of the borough. Census 2011 showed that in the east, the former wards of Fieldway, (now New Addington North), and New Addington, (now New Addington South), had the highest proportions of social housing (council homes and other) with 60.6% and 42.2% respectively

### **Gender identity**

We have significant gaps in our data concerning gender reassignment; however, recent improvements in our data collection methods will address this gap over time, however we will only collect this data where relevant to service delivery.

### **Language**

The Census 2011 showed that 14.5% of people in Croydon had a language other than English recorded as their main language. The majority could speak English well but around 1 in 6 of this group (17.2%) amounting to 2.5% of the total Croydon population at the time could not speak English well or at all. Residents are able to request that information is provided in different formats or alternative languages to ensure that they are able to understand information relating to the consultation. This provision will continue through the project and will be especially important in the event of a resident ballot.

## Equality Analysis

### **Sexual orientation**

We have significant gaps in our data concerning sexual orientation in respect of council tenants, housing applicants and homeless households. Census data provides a good estimate of the diversity of religious belief in Croydon.

### **Marital status**

We do not hold marital status data for around one in three council tenants.

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