

1. Introduction

1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

2. Proposed change

Directorate	Resources
Title of proposed change	Asset Disposals
Name of Officer carrying out Equality Analysis	Steve Wingrave

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

This report recommends the disposal of 5 surplus assets and a wider delegation for future asset disposals. The assets are all surplus and are being sold to help support the Council's current financial position to ensure the continued delivery of key services to residents

The disposals are in line with the Improvement and Assurance Panels requirements for the Council to demonstrate that they are disposing of all non-essential assets to help reduce the current level of borrowing.

In respect of the disposal of 58 Ashburton Road this is being sold with the lease in place which gives Care to Listen security to continue operating from the site until January 2027 and therefore their service provision will not be impacted in the medium term through the disposal of the asset from either a financial or occupational aspect in respect of the property

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. 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 Additional information needed to determine impact of proposed change

Table 1 – 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.

Additional information needed	Information source	Date for completion
The proposed disposals will have a limited impact as the three residential properties are all currently vacant due to either structural issues or being unsuitable for current housing requirements and it is not financially viable to carry out the necessary repairs and improvements to return them to the housing stock. It is therefore not considered that	Asset Management/ELT	June 2021

<p>the disposal of any of these properties will have an impact on any individual with a protected characteristic.</p> <p>The two commercial assets are currently in use but:</p> <p>28 Boulogne Road - this was a former store used by the Croydon Equipment Service. The main function was relocated to larger and more accessible space offering better conditions for staff than the old site. This site continued to be used on a temporary basis by the service during Covid for the storage of additional equipment but this requirement has now greatly reduced and is no longer needed on a long term basis.</p> <p>58 Ashburton Road – this is the current base for Care to Listen who provide support to individuals with mental health issues. A new lease has been put in place to match their commissioning agreement and therefore they will remain operating from this site even after the sale takes place with the lease expiring 4 January 2027. The impact will therefore be minimal in the medium term and they will have sufficient opportunity to relocate before the end of the lease. The lease will secure both their occupational and financial position in respect of property costs.</p>		

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.2 Deciding whether the potential impact is positive or negative

Table 2 – 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	The disposals will not directly impact any protected characteristic group as they are either currently unsuitable for occupation, have a temporary use or a lease in place to allow the current use to continue in the medium term.	there is a loss of 3 residential properties which will be offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months.	Asset Management Team Please see Appendix 1 for Protected characteristic population data
Disability	The disposals will not directly impact any protected characteristic group as they are either currently unsuitable for occupation, have a temporary use or a lease in place to allow the current use to continue in the medium term. The current use of 58 Ashburton Road to support people with mental health issues will continue at least in the medium term as a 5 year lease has been put in place.	None in the medium term but if the new owner does not renew the lease, the tenant will be required to relocate which could impact on the service provided. By putting the lease in place the impact has been mitigated in the medium term. there is a loss of 3 residential properties which will be offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months.	In respect of Care to Listen we are unaware of the wider protected characteristics of clients, but it could be expected that these will be representative of the general Croydon population. Contact will be made with Care to Listen to try and establish further details and the EQIA will be updated accordingly
Gender	The disposals will not directly impact any protected characteristic group as they are either currently unsuitable for occupation, have a temporary use or a lease in place to allow the current use to continue in the medium term.	there is a loss of 3 residential properties which will be offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months.	As above.
Gender Reassignment	The disposals will not directly impact any protected characteristic group as they are either currently unsuitable for occupation, have a temporary use or a lease in place to allow the current use to continue in the medium term.	there is a loss of 3 residential properties which will be offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months.	As above.

Marriage or Civil Partnership	The disposals will not directly impact any protected characteristic group as they are either currently unsuitable for occupation, have a temporary use or a lease in place to allow the current use to continue in the medium term. For the vacant homes, it is likely that these will be re-used for residential purposes and therefore offer new and better quality accommodation	there is a loss of 3 residential properties which will be offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months.	As above.
Religion or belief	The disposals will not directly impact any protected characteristic group as they are either currently unsuitable for occupation, have a temporary use or a lease in place to allow the current use to continue in the medium term.	there is a loss of 3 residential properties which will be offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months.	As above.
Race	The disposals will not directly impact any protected characteristic group as they are either currently unsuitable for occupation, have a temporary use or a lease in place to allow the current use to continue in the medium term.	there is a loss of 3 residential properties which will be offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months.	As above.
Sexual Orientation	The disposals will not directly impact any protected characteristic group as they are either currently unsuitable for occupation, have a temporary use or a lease in place to allow the current use to continue in the medium term.	there is a loss of 3 residential properties which will be offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months.	As above.
Pregnancy or Maternity	The disposals will not directly impact any protected characteristic group as they are either currently unsuitable for occupation, have a temporary use or a lease in place to allow the current use to continue in the medium term.	there is a loss of 3 residential properties which will be offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months.	As above.

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.

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Equality Analysis

Table 5 – Impact scores

Column 1 PROTECTED GROUP	Column 2 LIKELIHOOD OF IMPACT SCORE Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Column 3 SEVERITY OF IMPACT SCORE Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Column 4 EQUALITY IMPACT SCORE Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group. Equality impact score = likelihood of impact score x severity of impact score.
Age	2	1	2
Disability	3	2	6
Gender	2	1	2
Gender reassignment	2	1	2
Marriage / Civil Partnership	2	1	2
Race	2	1	2
Religion or belief	2	1	2
Sexual Orientation	2	1	2
Pregnancy or Maternity	2	1	2

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 x

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Table 5 – 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	There is a loss of 3 residential properties	5 year lease granted to allow continue use of the property by the existing tenants	Steve Wingrave	Lease completed
Race	There is a loss of 3 residential properties	The loss of 3 residential properties is offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months.		Completed

Equality Analysis

Sex (gender)	There is a loss of 3 residential properties	The loss of 3 residential properties is offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months		
Gender reassignment	There is a loss of 3 residential properties	The loss of 3 residential properties is offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months		
Sexual orientation	There is a loss of 3 residential properties	The loss of 3 residential properties is offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months		
Age	There is a loss of 3 residential properties	The loss of 3 residential properties is offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months		
Religion or belief	There is a loss of 3 residential properties	The loss of 3 residential properties is offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months		
Pregnancy or maternity	There is a loss of 3 residential properties	The loss of 3 residential properties is offset by the acquisition of new properties. Over 200 properties		

Equality Analysis

		have been acquired by the council over the past 18 months		
Marriage/civil partnership	There is a loss of 3 residential properties	The loss of 3 residential properties is offset by the acquisition of new properties. Over 200 properties have been acquired by the council over the past 18 months		

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter X in column 3 (Conclusion) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.	
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form We have given Care to Listen a 4 year lease, so the group have some security of tenure.	X
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. 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.	

Equality Analysis

Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet Yes.	Meeting title: Cabinet Date: 22 March 2023	

7. Sign-Off

Officers that must approve this decision		
Equality lead	Name: Denise McCausland	Date: 2 March 2023
	Position: Equalities Programme Manager	
Director	Name: Steve Wingrave	Date: 2 March 2023
	Position: Assistant Director Property Services	

Appendix One: data broken down by Protected Characteristics The information below is taken from the 2011 census unless otherwise indicated.

Age groups Number of people Percentage

0-4 years 27,972 7.7%
 5-7 years 14,388 4.0%
 8-9 years 8,708 2.4%
 10-14 years 23,130 6.4%
 15 years 4,912 1.4%

Equality Analysis

16-17 years 9,934 2.7%
18-19 years 8,720 2.4%
20-24 years 23,591 6.4%
25 -29 years 27,692 7.6%
30-44 years 82,439 22.7%
45-59 years 70,488 19.4%
60-64 years 17,029 4.7%
65-74 years 23,155 6.4%
75-84 years 15,318 4.2%
85-89 years 3,881 1.1%
Over 90 years 2,021 0.6%

People with long term illnesses or disabilities 363,378

Blind or visually impaired These categories were not recorded as such in the 2011 census. However, this did record that there were 24,380 people (6.7%) whose day to day activities were limited a lot by long term Deaf or hearing impaired Other communication impairment Mobility impairment Learning difficulty or disability Mental health condition 21 HIV, multiple sclerosis or cancer illness or disability and 28,733 (7.9%) whose day to day activities were limited a little (Office of National Statistics) Other (please specify)

Gender

Male 176,224 48.5%
Female 187,154 51.5%

Ethnicity

Number of people Percentage White British 171,740 47.3%
White Irish 5,369 1.5%
White Gypsy or Irish Traveller 234 0.1%
Other White background 22,852 6.3%
Black African 28,981 8.0%
Black Caribbean 31,320 8.6%
Other Black background 12,955 3.6%

Equality Analysis

Bangladeshi 2,570 0.7%
Chinese 3,925 1.1%
Indian 24,660 6.8%
Pakistani 10,865 3.0%
Other Asian background 17,607 4.8%
Mixed White and Black Caribbean 9,650 2.7%
Mixed White and Black African 3,279 0.9%
Mixed White and Asian 5,140 1.4%
Other Mixed background 5,826 1.6%
Arab 1,701 0.5%
Other ethnic group (please specify) 4,704 1.3%

Religion

Number of people Percentage Buddhist 2,381 0.70%
Christian 205,022 56.40%
Hindu 21,739 6.00%
Jewish 709 0.20%
Muslim 29,513 8.10%
Sikh 1,450 0.40%
No religion/faith 72,654 20.00%
Other (please specify) 2,153 0.60%

Sexual orientation

Lesbian There are no figures from the 2011 census. However, it is estimated that there were 20,370 lesbians, gay men, bisexual and transgender people living in Croydon in 2001. (London LGBT)
Gay Bisexual Transgender Transgender See above

Pregnancy or maternity Pregnant

These categories were not recorded as such in the 2011 census. However, there were 5,720 live births in 2011 (Office of National Statistics) On compulsory maternity leave Marriage or civil partnership Married 122,013 42.9% In civil partnership 796 0.3%