

Equality Impact Assessment

Stage 1: The proposed change that is being assessed and responsibility for the EQIA

Name of the proposed change	The introduction of a new collaborative approach to investment; Croydon Investment Plan – Unlocking Croydon’s Potential
Purpose of proposed change	This plan will impact on communities living or working in the borough of Croydon. The Investment Plan establishes a collaborative, data-driven approach to inward investment. This strategic framework will enable the Council to foster long-term growth and financial success while enabling new economic and regeneration opportunities for the residents of Croydon.
Is this a change to a policy, practice or service?	Service Delivery and Shaping of Policy
Who has senior level responsibility for the proposed change?	Heather Cheesbrough, Director of Planning & Regeneration
Who is completing this assessment?	Carol Squires, Head of Employment, Skills & Economic Development
Indicate where your EQIA will be submitted to including date where known:	<i>Cabinet, 25th September 2024</i>

Stage 2: Deciding what relevance the proposed change has for equality

Is the proposed change likely to impact on any of the following? <i>If there is no equality relevance for either go to Stage 7 and get sign off</i>	<input checked="" type="checkbox"/> Communities <input type="checkbox"/> Employees
Is the impact on equality low, medium or high?	This investment plan will significantly positively impact equality by creating economic and regeneration opportunities across Croydon, ensuring all communities benefit from the borough’s growth. By strategically attracting investment and enhancing infrastructure, the plan aims to regenerate the town centre, support local jobs, and boost industries like hospitality and digital sectors. It prioritises tackling inequalities, fostering collaboration with key partners, and deploying funds strategically to ensure inclusive development. The focus on skills development, particularly for young people, alongside efforts to improve

	safety and public services, ensures that the benefits of Croydon's growth are shared equitably among its diverse population.
Summary of EQIA outcome:	This Investment Plan has been specifically created to unlock investment that provides opportunities for residents and businesses located in the borough. The Plan has highlighted areas of deprivation and the need to unlock investment to address challenges.

Stage 3: Describe how the proposed change might impact on the council's ability to undertake the Public Sector Equality Duty and commitment to anti-racism (N.B. this can be both positive or negative):

Eliminating discrimination, harassment, victimisation	The Council is committed to eradicating discrimination, harassment, victimisation, and any conduct prohibited under the Equality Act 2010.
Advancing equality of opportunity	The Council aims to create equal access to opportunities for individuals who share a relevant protected characteristic and those who do not, ensuring fairness and equity in all its activities. Including; <ul style="list-style-type: none"> • removing or minimising disadvantage suffered by people due to their relevant protected characteristics. • taking steps to meet different needs of people who share relevant protected characteristics. • encouraging participation for underrepresented groups. • taking steps to meet the needs of disabled persons.
Fostering good relations	Efforts are made to promote positive relationships between those who share protected characteristics and those who do not, fostering a community where diversity is respected and celebrated.
Embedding anti-racism	The concept of embedding anti-racism within the Council's policies and operations involves integrating a proactive stance against racism in all aspects of governance, decision-making, and service delivery.

Stage 4: What evidence has been considered and what consultation has been carried out?

Data collection	<p>For the Council to fully understand the economic opportunities and challenges in the borough, London Borough of Croydon commissioned PRD to develop an economic evidence base (appendix two).</p> <p>For the economic evidence base, PRD analysed data from sources such as the ONS (e.g. job and business counts, Census), DLUHC/MHCLG (indices of multiple deprivation, energy performance ratings), Consumer Data Research Centre (e.g. food insecurity), the GLA High Streets Data Service (town centre footfall, spending), CoStar (commercial property trends), and Realyse (residential property trends). PRD also held engagement sessions with local businesses, and business groups to collect their views and experiences of Croydon’s economy.</p> <p>Key findings from the evidence base included the following:</p> <p>Population & labour market: From 2011 to 2021,</p> <ul style="list-style-type: none"> • Croydon’s population increased by 6%; of note, within Croydon town centre, the population almost doubled in that time and brought largely working-age residents into the area, likely linked to town centre residential development. • Resident qualification levels increased from 2011 to 2021; 64% now have a Level 3 (BTEC or equivalent) or higher qualification. • Uptake of the highest level of apprenticeship has climbed noticeably, from 850 participants in 2018/19 to 1810 in 2022/23. • State school attainment is improving, but remains below London levels, especially for disadvantaged students attending schools in Croydon; • 68% of Croydon state school students sustain places in higher education or training compared to 78% across London. • Unemployment is currently around 5% (nearly on par with London) and has trended downwards in Croydon since 2013.
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- Meanwhile, economic inactivity rates have been steady overall, but there has been an increase in the proportion of people citing long-term illness as keeping them out of work (17% in 2012 vs 25% in 2022), an issue seen in other places throughout the country.
- Residents are likely to have different experiences of the economy depending on where they live in the borough. In places such as Coulsdon, Selsdon, and Addiscombe, residents are less likely to experience health deprivation, fuel poverty, and crime than in places such as Croydon town centre, Thornton Heath, New Addington, and South Norwood.

Jobs & sectors:

- The number of jobs in Croydon increased by around 12,000, or 10%, from 2012 to 2022. This is below the overall London change of 26%.
- Croydon has high proportions of retail, health, and public administration jobs compared to London (in aggregate, 43% of jobs in Croydon vs 27% of jobs in London) and a lower proportion of professional and technical jobs (8% in Croydon vs 14% in London).
- Although resident and worker pay has increased in nominal terms, it has flat lined in real terms, eroding household purchasing power and entrenching deprivation for those already experiencing financial insecurity. The proportion of jobs in Croydon paying London Living Wage (LLW) has increased since 2017, but remains below the London average, with an estimated 19% of workers still earning below LLW.

Property:

- Rent prices for office and industrial space in Croydon doubled from 2013 to 2023 (£15/sq ft. to £30/sq ft. and £8/sq ft. to £15/sq ft. respectively), though they remain below London levels; vacancy rates on par with London (around 9% and 5% respectively) suggest good demand.
- There has been a decline in both types of space in Croydon during this time (-12% of office floor space, -2% of industrial floor space). The cost of retail floor space has fallen (£33 to £26) and the vacancy rate is around 3.5% (2.5% in London), suggesting less demand.
- As with the rest of the country, a substantial amount of commercial space in Croydon needs retrofitting to meet forthcoming Minimum Energy Efficiency Standard regulations: around 47% of floor space needs improvement by 2027 to remain lettable.

	<ul style="list-style-type: none"> • In terms of residential property, purchase prices have crept up (14% from November 2018 to 2023, latest average around ~£420,000), but they remain more affordable than much of London. • Like elsewhere in the capital, rents have become a sticking point, rising 36% from November 2018 to 2023 (or £1175/mo to £1600/mo)—still below overall London prices but a difficult increase for many households. <p>This information has been used to prepare a strong evidence base for the Croydon Investment Plan and the forthcoming Town Centre Regeneration Strategy.</p>
Consultation	<p>Extensive consultation was undertaken to create this Investment Plan, which included workshops with local government officers, businesses, Croydon business membership and support organisations, the community and voluntary sector, developers and young people. In total 5 workshops were held with 232 delegates attending.</p>

Stage 5: Identify any adverse or positive impact and mitigation steps that can be or have been taken

Guidance on Impact Scores: Consider the impact of your proposal by giving a numerical score to both the likelihood of an impact and the severity of an impact against each characteristic. This should draw upon the evidence you cited at Stage 3.

<p>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.</p>	<p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>
<p>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.</p>	<p>1 = Low 2 = Medium 3 = High</p>
<p>The score for likelihood and severity are then multiplied.</p>	<p>e.g. Unlikely to impact =1, Low impact =1, total score =1</p>

Characteristics		Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown)*	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines.**
Protected Characteristics (Equality Act 2010)	Age	2	2	4	Positive	
	Disability	1	1	1	Positive	
	Gender Reassignment	1	1	1	Positive	
	Marriage or Civil Partnership	1	1	1	Positive	
	Pregnancy and Maternity	1	1	1	Positive	
	Race	1	1	1	Positive	
	Religion or Belief	1	1	1	Positive	
	Sex	2	2	4	Positive	
	Sexual Orientation	1	1	1	Positive	

* Unknown impact may only be used where there is no data or evidence available and must be accompanied by an action plan for how to collect this.

** Mitigations must be referenced in the Equalities comments of the substantive report and in its recommendations.

Stage 6: What is the outcome of your assessment? Select one of these four options:

Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the proposed change 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.	X
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, ensure you have completed Section 5 above.	
Continue the proposed change despite potential for adverse impact	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, there are justifiable reasons to continue as planned. If you reach this conclusion, ensure you have completed Section 4 above, clearly setting out your justifications.	
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.	

Stage 7: EQIA Monitoring and Sign Off

How will the EQIA be reviewed and monitored, including timescales?	<i>[EQIAs must be reviewed every 2 years or sooner if new data or impact is identified.]</i>		
Equalities advice received from:	<i>Ken Orlukwu Senior Equalities Officer</i>	Date:	28/08/2024
EQIA approved by:	<i>[Name and job title Director or Corporate Director responsible]</i>	Date:	