

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

Directorate	Sustainable Communities
Title of proposed change	Adoption of the Parks and Green Spaces Renewal Strategy (2022-24)
Name of Officer carrying out Equality Analysis	Kelvin Shewry

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

This Equality Analysis (EA) is being carried out to support the creation and adoption of a Parks and Green Spaces Renewal Strategy. This is a strategic document setting out the three year vision (2022-24) and priorities for the Parks and Green Spaces service team.

Specifically the document sets out a high level proposal for how the council can best deliver a core service, within our means, keeping our parks clean, safe and accessible for all residents and visitors, as well as biodiverse for the natural world.

It references not only the strategic vision, but also how the service may change during the time period and how financial investment in these spaces may be possible. There is also a reference to a separate restructure process which is already underway.

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	<ul style="list-style-type: none"> With a large and growing youth population, we need to ensure that our parks are places that this group can access and feel welcome in. The strategy sets the action for significant improvements to playgrounds (for the very 		<ul style="list-style-type: none"> Parks Masterplans Consultation - 2016-17 P&G Survey – Summer 2020

	<p>young population) and this is to be supplemented through maintenance of other recreational assets. It will also be part of the new service remit to broaden how we engage with Croydon residents, including the youth population.</p> <ul style="list-style-type: none"> • There can be additional issues of mobility within the elder population and so responding to matters of accessibility, as outlined in the characteristic below, are a strategic priority. 		<ul style="list-style-type: none"> • P&G Strategy Engagement – Nov-Dec 2021
Disability	<ul style="list-style-type: none"> • There are popular green spaces with issues of accessibility and it's important that as part of the 'accessible' focus set out in our first strategy priority that we respond with relevant capital improvements in these locations. Also important is the need for future developments to address requirements for disability groups. 		<ul style="list-style-type: none"> • Parks Masterplans Consultation - 2016-17 • LBC Consultation – Autumn 2020 • P&G Survey – Summer 2020 • P&G Strategy Engagement – Nov-Dec 2021
Gender	<ul style="list-style-type: none"> • Perception of safety / fear – Research shows that women are more fearful in park spaces than men. Thus it's important to design and activate spaces in a way to promote confidence and safety. Our first strategy priority is 'clean, safe and accessible green spaces' and it is the service ambition to respond to issues of fear in these places. 		<ul style="list-style-type: none"> • Parks Masterplans Consultation - 2016-17 • P&G Survey – Summer 2020 • P&G Strategy Engagement – Nov-Dec 2021
Gender Identity	<ul style="list-style-type: none"> • Perception of safety / fear – As with the gender characteristic above, it may be that individuals who have proposed, started or completed a process to change sex are more fearful in green spaces. It's important to design and activate spaces in a way to promote confidence and safety. Our first strategy priority is 'clean, safe and accessible green spaces' and it is the service ambition to respond to issues of fear in these places. 		<ul style="list-style-type: none"> • Parks Masterplans Consultation - 2016-17
Marriage or Civil Partnership	Neutral Impact	Neutral Impact	
Religion or belief		<ul style="list-style-type: none"> • Many Muslim people can be reluctant to share park space with dogs off the lead. The 	<ul style="list-style-type: none"> • Parks Masterplans Consultation - 2016-17

		council is not proposing and changes to parks byelaws to strengthen dog control orders, however they do already restrict dog owners entering these spaces if they do not have effectual restraint of the dog such that is does not cause annoyance to other people in the park. Dogs are also strictly not allowed in playgrounds and gates and signage support this rule.	<ul style="list-style-type: none"> • P&G Survey – Summer 2020
Race	<ul style="list-style-type: none"> • National and local research shows that BAME populations tend to be under-represented as park users. Without input from all ethnicities, it is unlikely that parks development and management will be carried out in a representative way. (This is a historical issue with parks development nationally.) The second priority within this strategy is to create a ‘collaborative’ service, which does engage with the broader Croydon population to hear our diverse voices. This is supported with a new service team structure which is better resourced to achieve this ambition. 		<ul style="list-style-type: none"> • Parks Masterplans Consultation - 2016-17 • LBC Consultation – Autumn 2020 • P&G Survey – Summer 2020
Sexual Orientation	<ul style="list-style-type: none"> • National research shows that the LGBT community can also be more fearful in parks. As per the Gender group above, our first priority for safe and accessible green spaces will support design and activation of these spaces to reduce the issues of fear. 		<ul style="list-style-type: none"> • Parks Masterplans Consultation - 2016-17 • P&G Survey – Summer 2020 • P&G Strategy Engagement – Nov-Dec 2021
Pregnancy or Maternity		<ul style="list-style-type: none"> • Common in research is the desire for increased toilets and baby changing facilities. The council is unable to increase provision of these facilities due to the financial impacts, however the strategy outlines the aim to maintain existing facilities in order and expand dual use of facilities that have previously been inaccessible. 	<ul style="list-style-type: none"> • Parks Masterplans Consultation - 2016-17 • P&G Survey – Summer 2020 • P&G Strategy Engagement – Nov-Dec 2021

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:

Additional information needed and or Consultation Findings	Information source	Date for completion

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

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

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Table 3 – 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	2	1	2
Gender	2	1	2
Gender identity	2	1	2
Marriage / Civil Partnership	1	1	1
Religion or belief	2	2	4
Race	2	1	2
Sexual Orientation	2	1	2
Pregnancy or Maternity	3	2	6

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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
Religion or belief	No increased actions RE dog control in parks	Increased communications on 'dogs in parks' via LBC social media, on-site signage and through engagement with specific groups as part of service ambition to work more collaboratively and inclusively.	Parks & Green Space Development team	During 2022/23 and 2023/24 financial years.
Pregnancy or Maternity	No increased toilet facilities in parks	Council focus on maintaining open the existing facilities in parks. Also, officers will work on making existing facilities more widely accessible to groups through expanding use agreements (eg pavilions).	Parks & Green Space Development team	During 2022/23 and 2023/24 financial years.

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	<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.</p> <p>The adoption and implementation of this strategy will not create any service changes which will discriminate against protected groups. With that being said, our parks and green spaces are not fully inclusive and accessible places (as it the case across the country) and improvements can and will be made. This new strategy focuses on a small number of core priorities to support resolving matters such as under-representation in park user engagement as well as straight forward capital investment required to make physical improvements for the benefit of specific groups.</p>	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 set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised.	
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.	
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		Meeting title: Cabinet (For approval to adopt the strategy.) Date: 7 February 2022

7. Sign-Off

Officers that must approve this decision		
Equalities Lead	Name: Denise McCausland Position: Equalities Manager	Date: 25 January 2022
Director	Name: Steve Iles Position: Director of Sustainable Communities	Date: 26 January 2022