

# Equality Analysis Form

Delivering for Croydon

**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>Household Support Fund</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Natasha Jebbsion</b>

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

Briefly summarise the proposed change and why it is being considered/anticipated outcomes. What is meant to achieve and how is it seeking to achieve this? Please also state if it is an amendment to an existing arrangement or a new proposal.

The Department of Work and Pensions (DWP) has announced the Household Support Fund (HSF) to support vulnerable residents between 1<sup>st</sup> October 2022 and 31<sup>st</sup> March 2023.

### **Overview and aim of the fund**

Croydon has been allocated £3,013,689.49.

The primary aim of the fund is to reduce food & fuel poverty between October and March, by providing residents with access to food and fuel who may otherwise go without. Support will also be provided for other essentials associated with food & fuel. This includes but isn't limited to, fridge, freezers, cookers, microwave and boiler repairs. Where needed the fund will be used to support with wider essentials that can help reduce poverty over the next 6 months including help with other bills, clothing & one-off housing cost (where no other support is available).

The fund also empathises the need to support residents who will not be eligible for wider government support being provided this winter. This includes:

- Energy Bills Support Scheme and the equivalence package confirmed on 29 July 2022
- Council Tax Rebate and the associated £144 million Discretionary Fund
- Cost of Living Payments for those on means tested benefits
- £150 Disability Cost of Living Payment
- One-off £300 Pensioner Cost of Living Payment (through the Winter Fuel Payment)

Below are details on how Croydon aims to achieve the above.

### **Targeted work**

Croydon will target vulnerable residents that will be in eligible for Household support fund. This will be achieved by using internal & external services.

#### **Internally**

A total of £781,781 has been allocated to support vulnerable residents, in particular those ineligible for wider government support and households in financial difficulties as they will struggle the most with meeting the increasing cost of living. A collaborative piece of work is being done across Children Social Care, Housing and Revenues to identify these residents. The fund will help bolster the support they already provide to ensure that fuel & food poverty can be reduced. Services have already begun to identify residents and will continue to do so between now and March.

#### **Externally**

The fund will not be allocated to community groups and other third-party organisations. However, we will be working with them to promote the scheme, especially among hard-to-reach groups such as pensioners.

#### **Schools**

To tackle food poverty among children during the school holidays £1,340,000 has been allocated to Croydon schools. Schools will provide food during 5 weeks of school holidays for 17,866 families in receipt of free school meals. An additional £270,000 will be provided to schools to provide discretionary awards for families not in receipt of Free School Meals.

**Applications process**

To ensure that Croydon can reach as many residents as possible with the Household Support Fund £477,340.49 has been made available for direct applications and referrals from other external and internal services. The Discretionary Support team will administrate this using their knowledge and past experience to maximise the fund and support the right applicants.

**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	£1,610,000 will provide food for a total of 21,439 children across the borough during school holidays.	Unlike previous funds there is no ring-fencing for age. As the fund allocation focuses on families in receipt of free school meals there is risk that adults with no/adult children may not access the fund in	Information provided by the education department and schools  Copy of Conversation with Education re HSF

		the same way that children would. the application process aims to pick up this group of people however as it isn't targeted some residents may not be aware of the support and access it.																																																			
Disability	Although the fund does not target residents with disabilities there is wider support being provided by the government through the Disability Cost of Living Payment as well as the Energy Bill Support Scheme.	There is not targeted work and the DCLP is for residents in receipt of certain disability benefits. This could marginalise residents not in receipt of these benefits. The discretionary element of the fund will support those with disabilities who are financially struggling. The application process will also use discretion for residents who health conditions require more heating over the winter	<p><a href="http://www.direct.gov">Direct.gov</a></p> <p>Observatory <a href="http://www.croydonobservatory.org/">http://www.croydonobservatory.org/</a></p> <table border="1"> <thead> <tr> <th>Age</th> <th>Day-to-day activities limited a lot</th> <th>Day-to-day activities limited a little</th> <th>Day-to-day activities not limited</th> <th>All categories: Long-term health problem or disability</th> </tr> </thead> <tbody> <tr> <td>Age 0 to 15</td> <td>1,303</td> <td>1,772</td> <td>75,952</td> <td>79,027</td> </tr> <tr> <td>Age 16 to 24</td> <td>842</td> <td>1,286</td> <td>39,839</td> <td>41,967</td> </tr> <tr> <td>Age 25 to 34</td> <td>1,244</td> <td>1,988</td> <td>52,903</td> <td>56,135</td> </tr> <tr> <td>Age 35 to 49</td> <td>3,992</td> <td>5,277</td> <td>72,582</td> <td>81,851</td> </tr> <tr> <td>Age 50 to 64</td> <td>5,179</td> <td>6,766</td> <td>46,597</td> <td>58,542</td> </tr> <tr> <td>Age 65 to 74</td> <td>3,421</td> <td>4,937</td> <td>14,512</td> <td>22,870</td> </tr> <tr> <td>Age 75 to 84</td> <td>4,030</td> <td>4,612</td> <td>6,180</td> <td>14,822</td> </tr> <tr> <td>Age 85 and over</td> <td>2,482</td> <td>1,496</td> <td>1,038</td> <td>5,016</td> </tr> <tr> <td><b>Total All Ages</b></td> <td><b>22,493</b></td> <td><b>28,134</b></td> <td><b>309,603</b></td> <td><b>360,230</b></td> </tr> </tbody> </table>	Age	Day-to-day activities limited a lot	Day-to-day activities limited a little	Day-to-day activities not limited	All categories: Long-term health problem or disability	Age 0 to 15	1,303	1,772	75,952	79,027	Age 16 to 24	842	1,286	39,839	41,967	Age 25 to 34	1,244	1,988	52,903	56,135	Age 35 to 49	3,992	5,277	72,582	81,851	Age 50 to 64	5,179	6,766	46,597	58,542	Age 65 to 74	3,421	4,937	14,512	22,870	Age 75 to 84	4,030	4,612	6,180	14,822	Age 85 and over	2,482	1,496	1,038	5,016	<b>Total All Ages</b>	<b>22,493</b>	<b>28,134</b>	<b>309,603</b>	<b>360,230</b>
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Sex	In the ward identified by Policy and Practice (PiP) as having the highest number of households most at risk there is a high amount of male claimants compared to female despite being smaller in population. The fund will	These groups are not targeted and their engagement will be subject to them apply for the fund.	<p>Observatory <a href="http://www.croydonobservatory.org/">http://www.croydonobservatory.org/</a></p> <p>9.6% of Men &amp; 8.2% of women in Croydon are unemployed. 7,635 men &amp; 9,855 women are claimants .</p>																																																		

	provide additional financial support to these residents.		
Gender Reassignment Identity	We do not have access to this data and cannot assess the impact.		
Marriage or Civil Partnership	43% of Croydon's residents are married or in a Civil Partnership. Of the 43%, 21% live in the wards identified by PiP as being at most risk. The fund will provide support to this cohort of residents.		<p>Observatory  <a href="http://www.croydonobservatory.org/">http://www.croydonobservatory.org/</a></p> <p>43% of Croydon's residents are married or in a Civil Partnership. Of the 43%, 21% live in the wards identified by PiP as being at most risk</p>
Religion or belief	All support provided will ensure the beliefs of different cultural or religious groups about food is taken into consideration.		<p>We do not have the data on financial stability among different religious groups so we are unable to assess the impact. However below is the breakdown of religious beliefs across Croydon.</p> <p>Buddhist - 0.7%  Christian - 56.4%  Hindu – 6%  Jewish - 0.2%  Muslim - 8.1%  Sikh - 0.4%  Other religion - 0.6%</p> <p>Observatory  <a href="http://www.croydonobservatory.org/">http://www.croydonobservatory.org/</a></p>
Race	The fund will provide financial support to those residents across the borough in need of support.		<p>Policy and practice tool <a href="https://liftdashboard.co.uk/">https://liftdashboard.co.uk/</a></p> <p>Observatory  <a href="http://www.croydonobservatory.org/">http://www.croydonobservatory.org/</a></p> <p>53% of Croydon's residents are BAME of this 35% live in the wards identified by PiP as having the highest number of households at risk. The BAME population makes up 73% of those 5 wards.</p>

Sexual Orientation	The fund will provide financial support to those residents across the borough in need of support.	The data does not include residents not in a registered same-sex civil partnership. Work will need to be done to ensure that the fund is published to residents not in registered same-sex civil partnership	Policy and practice tool <a href="https://liftdashboard.co.uk/">https://liftdashboard.co.uk/</a>  Observatory <a href="http://www.croydonobservatory.org/">http://www.croydonobservatory.org/</a>  0.3% of Croydon residents are in a registered same sex civil partnership, of which 18% live in the wards identified by PiP as having the highest number of household's at most risk.
Pregnancy or Maternity		There is targeted work for children over 5 but there is no targeted work for expected mothers and mothers with new born	Observatory <a href="http://www.croydonobservatory.org/">http://www.croydonobservatory.org/</a> - 6.8% of Croydon population is aged 0-4 years old - 6.8% of Croydon population is aged 0-4 years old  <u>Early years 0- 5 years</u> % of male children achieving a good level of development - 69 % of female children achieving a good level of development- 80

**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**

<b>Severity of Impact</b>	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	<b>Likelihood of Impact</b>			

**Key**

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



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**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	3	2	6
Disability	2	2	4
Gender	2	2	4
Gender reassignment	2	2	4
Marriage / Civil Partnership	2	2	4
Race	2	2	4
Religion or belief	2	2	4
Sexual Orientation	2	2	4
Pregnancy or Maternity	2	2	4

## 4. Statutory duties

### 4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

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

## 5. Action Plan to mitigate negative impacts of proposed change

**Important note:** Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

**Table 4 – Action Plan to mitigate negative impacts**

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	There will not be any targeted work for residents. There is not targeted work and the DCLP is for residents in receipt of certain disability benefits. This could marginalise residents not in receipt of these benefits. The discretionary	Work will be done to raise awareness of the fund with 3 <sup>rd</sup> party organisations that work with residents with a disability. Residents will be able to apply for support through the Discretionary Support team.	Natasha Jebbison	16/12/22

## Equality Analysis

	element of the fund will support those with disabilities who are financially struggling.	The application process will also use discretion for residents who health conditions require more heating over the winter.		
Race		Although there is no negative impacts to maximize the positive impact work will be done to raise awareness of the fund with 3rd sector groups.	Natasha Jebbison	16/12/22
Sex	These groups are not targeted and their engagement will be subject to them apply for the fund.	To maximize the positive impact work will be done to raise awareness of the fund with 3rd sector groups.	Natasha Jebbison	16/12/22
Gender reassignment		Although there is no negative impacts to maximize the positive impact work will be done to raise awareness of the fund with 3rd sector groups.	Natasha Jebbison	16/12/22
Sexual orientation	The data does not include residents not in a registered same-sex civil partnership.	Work will need to be done to ensure that the fund is published to residents not in registered same-sex civil partnership. To maximize the positive impact work will be done to raise awareness of the fund with 3rd sector groups.	Natasha Jebbison	16/12/22
Age	There will be no targeted work for residents not known to Education. Unlike previous funds there is no ring-fencing for age. As the fund allocation focuses on families in receipt of free school meals there is	Work will be done to raise awareness of the fund with 3 <sup>rd</sup> party organisations that work with older people and organisation that support young people. Residents will be able to apply	Natasha Jebbison	16/12/22

## Equality Analysis

	risk that adults with no/adult children may not access the fund in the same way that children would.	for support through the Discretionary Support team. The application process aims to pick up this group of people however as it isn't targeted some residents may not be aware of the support and access it.		
Religion or belief		Although there is no negative impacts to maximize the positive impact work will be done to raise awareness of the fund with faith groups.	Natasha Jebbison	16/12/22
Pregnancy or maternity	There is targeted work for children over 5 but there is no targeted work for expected mothers and mothers with new borns.	Work will be done to raise awareness of the fund with 3 <sup>rd</sup> party organisations including children centers and Early help. Residents will be able to apply for support through the Discretionary Support team	Natasha Jebbison	16/12/22
Marriage/civil partnership		Although there is no negative impacts to maximize the positive impact work will be done to raise awareness of the fund with 3 <sup>rd</sup> sector groups.	Natasha Jebbison	16/12/22

### 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>	
Adjust the proposed change	<p>We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b></p> <p>Due to the lack of data around these groups and the focus of the fund being on financial stability the focus has not been on protected groups. So work will need to be done to promote the fund to ensure residents in financial need within the protected groups access it.</p>	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. <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>	
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: Date:

## 7. Sign-Off

# Equality Analysis

<b>Officers that must approve this decision</b>	
<b>Equalities Lead</b>	<b>Name: Gavin Handford</b> <b>Date: 29/11/2022</b> <b>Position: Director of Policy, Programmes &amp; Partnerships</b>
<b>Director</b>	<b>Name: Susmita Sen</b> <b>Date: 29/11/2022</b> <b>Position: Corporate Director for Housing</b>