

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

Directorate	Resources
Title of proposed change	Council Tax Hardship Scheme 2023/24
Name of Officer carrying out Equality Analysis	

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 council is increasing council tax in 2023/24 by 14.99%. This is 10% above the national limits, this year the government provided special permission to three financially troubled councils, Croydon included, to raise council tax by over the usual 4.99 per cent without the need for a referendum.

To mitigate the impact for households that would struggle to meet the rising demand in council tax it is proposed that a hardship scheme be implemented for low-income households. This is a new scheme, aimed specifically at the rise in council tax and the burden it may create, there are also many other existing schemes that help those that vulnerable or struggling financially who otherwise may not qualify for this scheme.

The proposal is to implement a council tax discount, locally defined discount, which will reduce council tax by the value of the increase above the 4.99%.

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

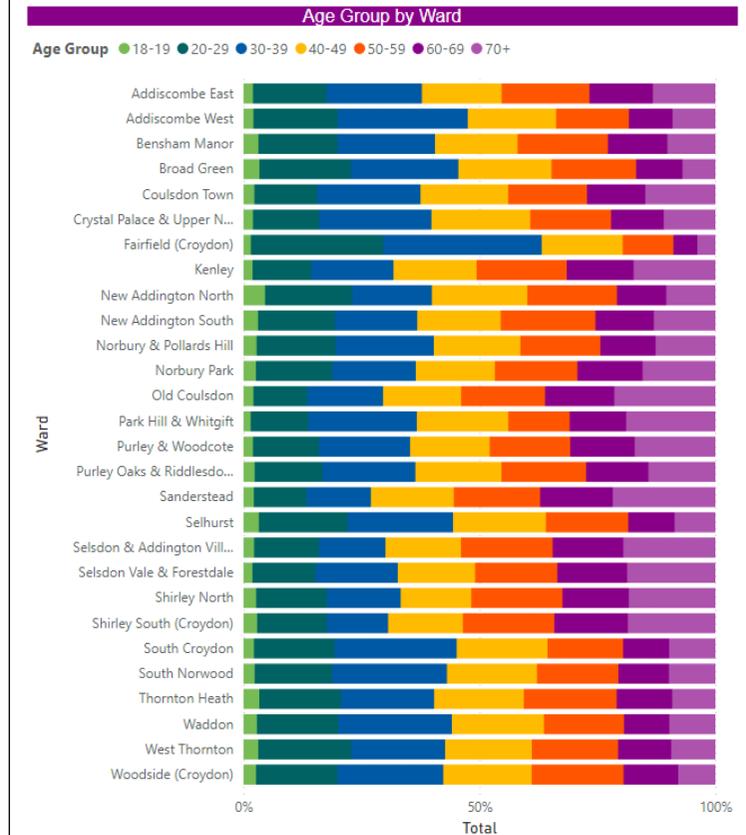
For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. If it is decided that analysis is not relevant to some groups, this should be recorded 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
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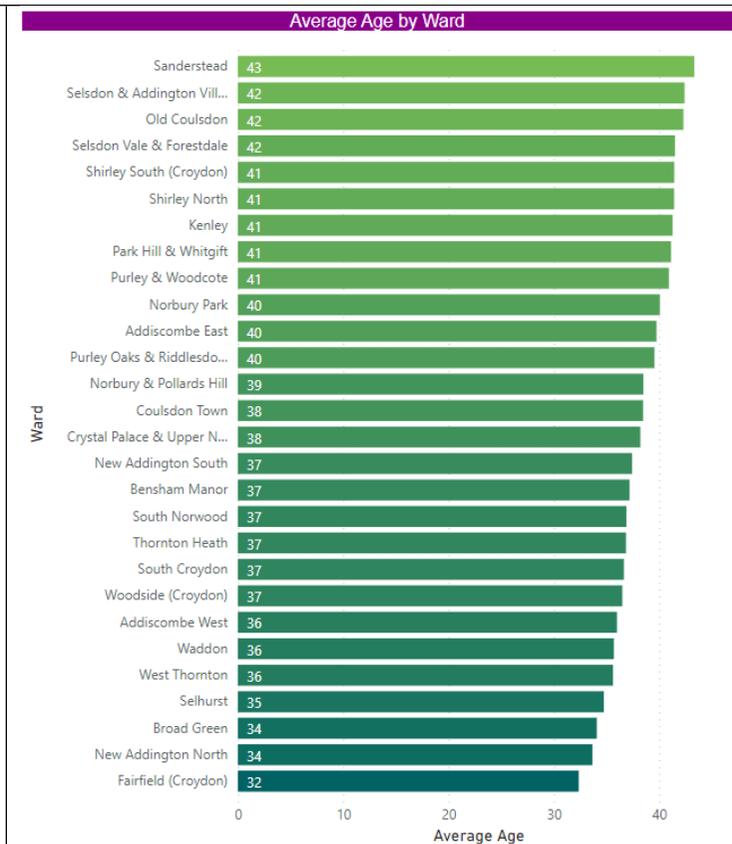
Age

- There is no exclusion for age. Only that a resident has a council tax liability, which means they must be at least 18 years old.
 - Someone under the age of 18 cannot be liable for council tax. There is no upper limit on age for council tax liability. Therefore, this scheme has no negative or positive impacts based on age when looking solely at entitlement based on age
 - The scheme is proposed to have an upper income limit based on household composition. If a household is made up of younger residents, they are therefore more likely to be entitled and vice-versa those older households are less likely to be entitled to support.
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- There is a maximum income limit to the scheme based on household composition. The older someone is the higher their income is likely to be. Therefore, it could be argued that the older someone is the less likely they are to be eligible for this scheme.
 - Someone under the age of 18 cannot be liable for council tax. There is no upper limit on age for council tax liability. Therefore, this scheme has no negative or positive impacts based on age when looking solely at entitlement based on age
 - The scheme is proposed to have an upper income limit based on household composition. If a household is made up of younger residents, they are therefore more likely to be entitled and vice-versa those older households are less likely to be entitled to support.
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According to the 2021 census, the split of ages across all wards in Croydon are somewhat comparable with each other. An outlier to note is Fairfield has a considerably lower average age than the rest of the borough's wards.



The average age by ward is shown below, again noting Fairfield has the lowest average age.

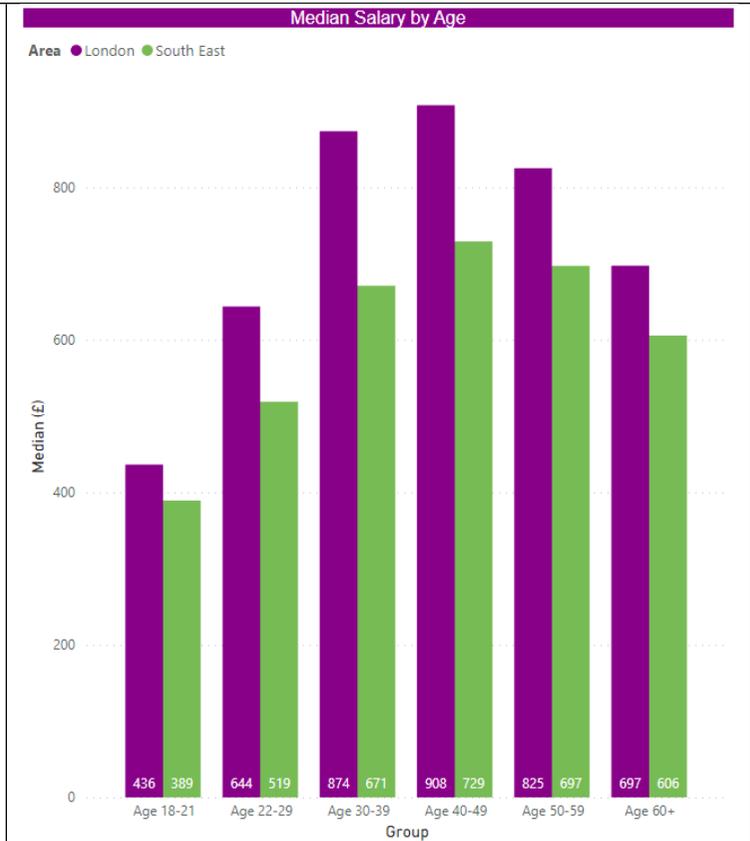


Whilst it is important to review the impact of this scheme across all ages the most important factor to entitlement is having a council tax liability..

Earnings by age

Whilst it is difficult to obtain data on Croydon specifically there are datasets available from the ONS which review earnings by age at a higher level.

From the below it is shown that in London and in the South East in full-time employment lower income ages are 18 to 29.



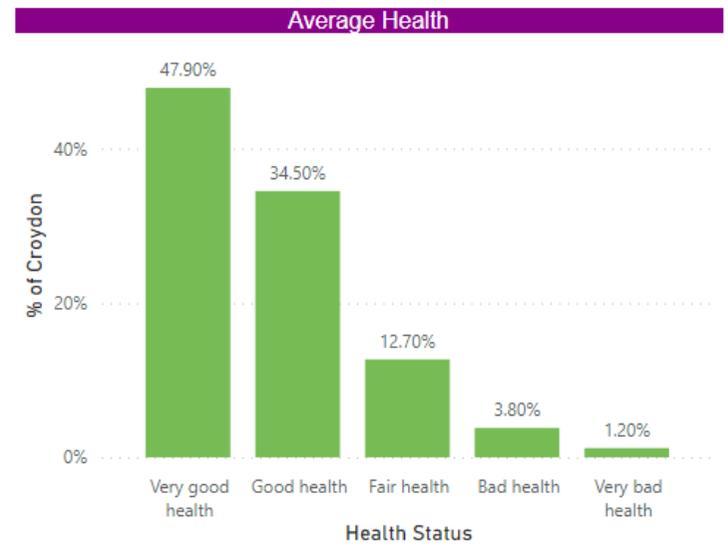
The scheme is proposed to have an upper income limit based on household composition. If a household is made up of younger residents, they are therefore more likely to be entitled and vice-versa those older households are less likely to be entitled to support.

Sources

[Earnings and hours worked, UK region by age group - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/employmentandhours/earnings/earningsandhoursworkedbyregionandagegroup)

[Age by single year - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ageandgender/birthsdeathsandmarriages/agebysingleyear)

<p>Disability</p>	<ul style="list-style-type: none"> • This scheme has allowed for additional income if a resident is disabled before they are not eligible. • A disabled resident is more likely to have lower income than someone who is not disabled. Having higher income limits for disabled residents is going a step further than for residents who are not disabled. 	<ul style="list-style-type: none"> • None identified that negatively impact this group. 	<p>The ONS Census 2021 states that 14.8% of Croydon residents are disabled, a population of 390k would put the disabled population at approximately 58k.</p> <p>Based on our current Council Tax Support caseload 31% (8.3k) of all our claims are identified as claims where either the claimant or partner is disabled. Compared to the base of Croydon's disabled population this is 14.4% of all disabled residents in receipt of CTS – which would mean they may automatically qualify for support based on their income.</p>
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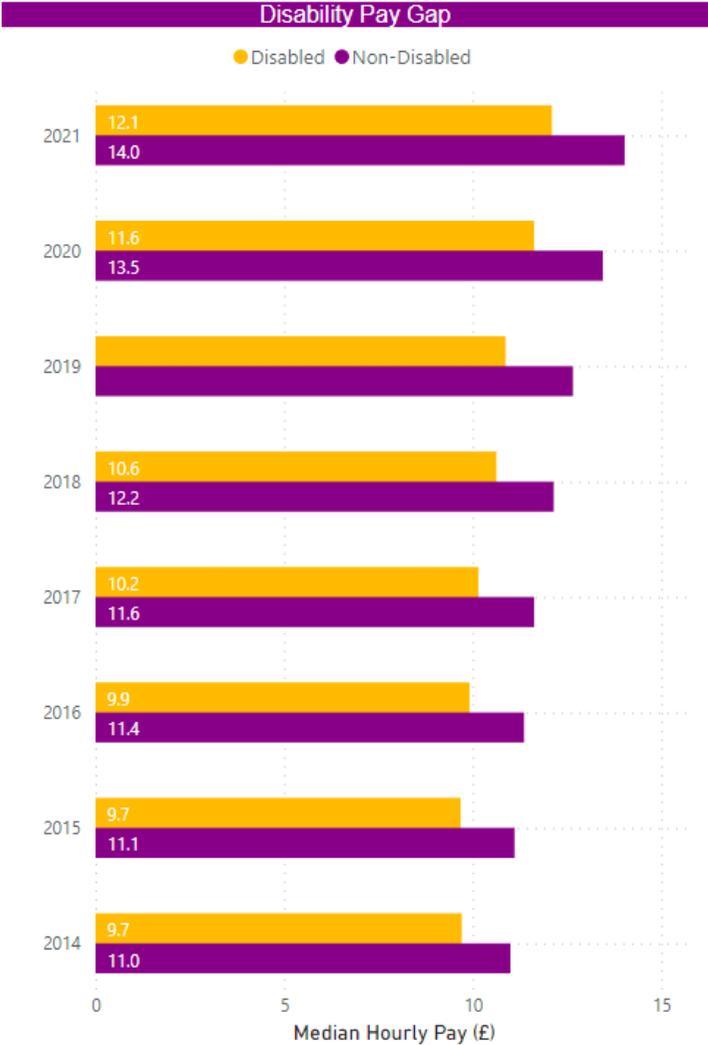


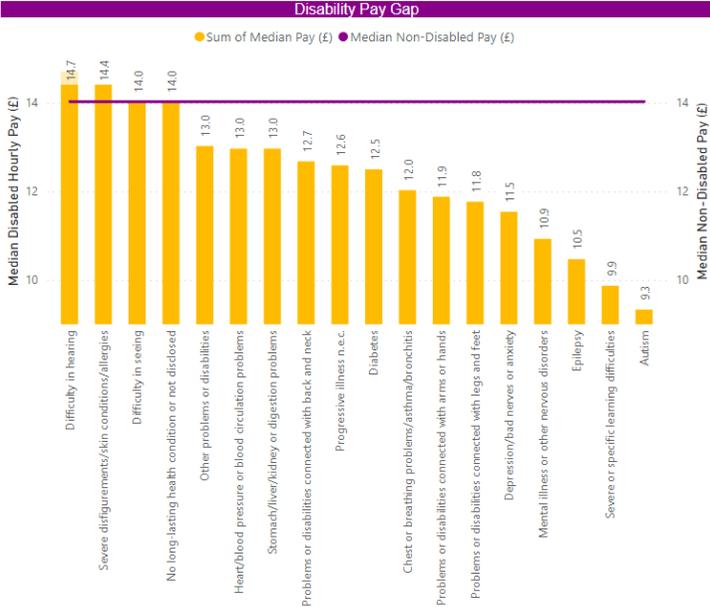
From the above it is noted that most of Croydon, 95.1% consider themselves to be in Fair Health or better.

This scheme is based on earnings and income, according to data from the ONS on the pay gap for disabilities it can be concluded that if a resident is

disabled, they are more likely to have a lower income than those who are not disabled.

However, this scheme recognises that disabled residents will have a higher need which is required to be supported by a higher income. This scheme places a higher maximum income limit for disabled above all others, with exception to large households.



			<p>From the chart above it can be seen that having a disability is more likely to mean a lower hourly wage.</p> <p>However, that is not the case for all disabilities, in fact some disabled categories in 2021 were earning a higher median hourly wage than non-disabled workers.</p>  <table border="1"> <caption>Disability Pay Gap Data</caption> <thead> <tr> <th>Disability Category</th> <th>Sum of Median Pay (£)</th> <th>Median Non-Disabled Pay (£)</th> </tr> </thead> <tbody> <tr><td>Difficulty in hearing</td><td>14.7</td><td>14.0</td></tr> <tr><td>Severe disfigurements/skin conditions/allergies</td><td>14.4</td><td>14.0</td></tr> <tr><td>Difficulty in seeing</td><td>14.0</td><td>14.0</td></tr> <tr><td>No long-lasting health condition or not disclosed</td><td>14.0</td><td>14.0</td></tr> <tr><td>Other problems or disabilities</td><td>13.0</td><td>14.0</td></tr> <tr><td>Heart/blood pressure or blood circulation problems</td><td>13.0</td><td>14.0</td></tr> <tr><td>Stomach/liver/kidney or digestion problems</td><td>13.0</td><td>14.0</td></tr> <tr><td>Problems or disabilities connected with back and neck</td><td>12.7</td><td>14.0</td></tr> <tr><td>Progressive illness n.e.c.</td><td>12.6</td><td>14.0</td></tr> <tr><td>Diabetes</td><td>12.5</td><td>14.0</td></tr> <tr><td>Chest or breathing problems/asthma/bronchitis</td><td>12.0</td><td>14.0</td></tr> <tr><td>Problems or disabilities connected with arms or hands</td><td>11.9</td><td>14.0</td></tr> <tr><td>Problems or disabilities connected with legs and feet</td><td>11.8</td><td>14.0</td></tr> <tr><td>Depression/bad nerves or anxiety</td><td>11.5</td><td>14.0</td></tr> <tr><td>Mental illness or other nervous disorders</td><td>10.9</td><td>14.0</td></tr> <tr><td>Epilepsy</td><td>10.5</td><td>14.0</td></tr> <tr><td>Severe or specific learning difficulties</td><td>9.9</td><td>14.0</td></tr> <tr><td>Autism</td><td>9.3</td><td>14.0</td></tr> </tbody> </table> <p>It would appear from the above that some disabilities do not impact on earnings potential however, this scheme makes no distinction between disabilities. Being disabled, regardless of disability type will entitle a resident to be assessed based on the higher rate of maximum income.</p>	Disability Category	Sum of Median Pay (£)	Median Non-Disabled Pay (£)	Difficulty in hearing	14.7	14.0	Severe disfigurements/skin conditions/allergies	14.4	14.0	Difficulty in seeing	14.0	14.0	No long-lasting health condition or not disclosed	14.0	14.0	Other problems or disabilities	13.0	14.0	Heart/blood pressure or blood circulation problems	13.0	14.0	Stomach/liver/kidney or digestion problems	13.0	14.0	Problems or disabilities connected with back and neck	12.7	14.0	Progressive illness n.e.c.	12.6	14.0	Diabetes	12.5	14.0	Chest or breathing problems/asthma/bronchitis	12.0	14.0	Problems or disabilities connected with arms or hands	11.9	14.0	Problems or disabilities connected with legs and feet	11.8	14.0	Depression/bad nerves or anxiety	11.5	14.0	Mental illness or other nervous disorders	10.9	14.0	Epilepsy	10.5	14.0	Severe or specific learning difficulties	9.9	14.0	Autism	9.3	14.0
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Sex	<ul style="list-style-type: none"> None identified that negatively impact this group. 	<ul style="list-style-type: none"> As males are typically remunerated at a higher rate than females depending on household composition a male household would be ineligible for the scheme sooner than females. 	<p>Croydon is split 52% female and 48% male according to the ONS Census from 2021.</p> <p>As shown below, broken down by ward, every ward in Croydon has a higher population of females than males with exception to Fairfield.</p>																																																									

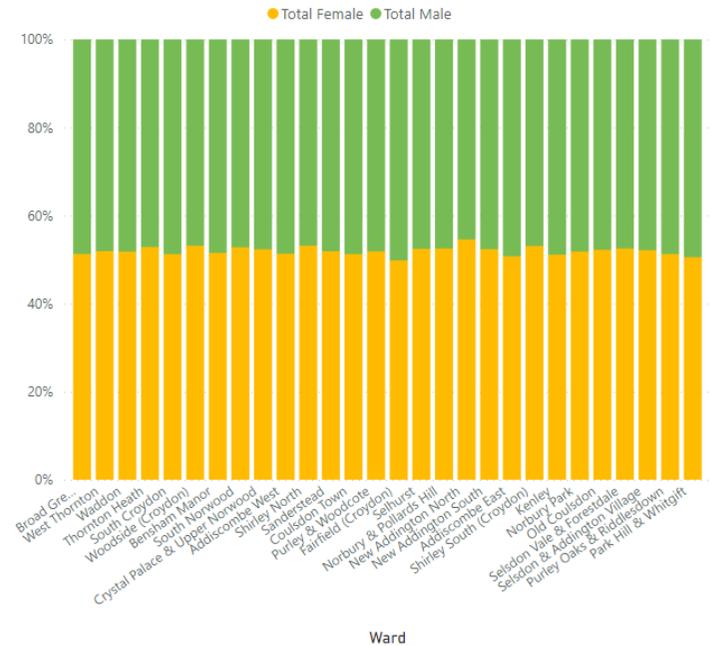
Female Population

Male Population

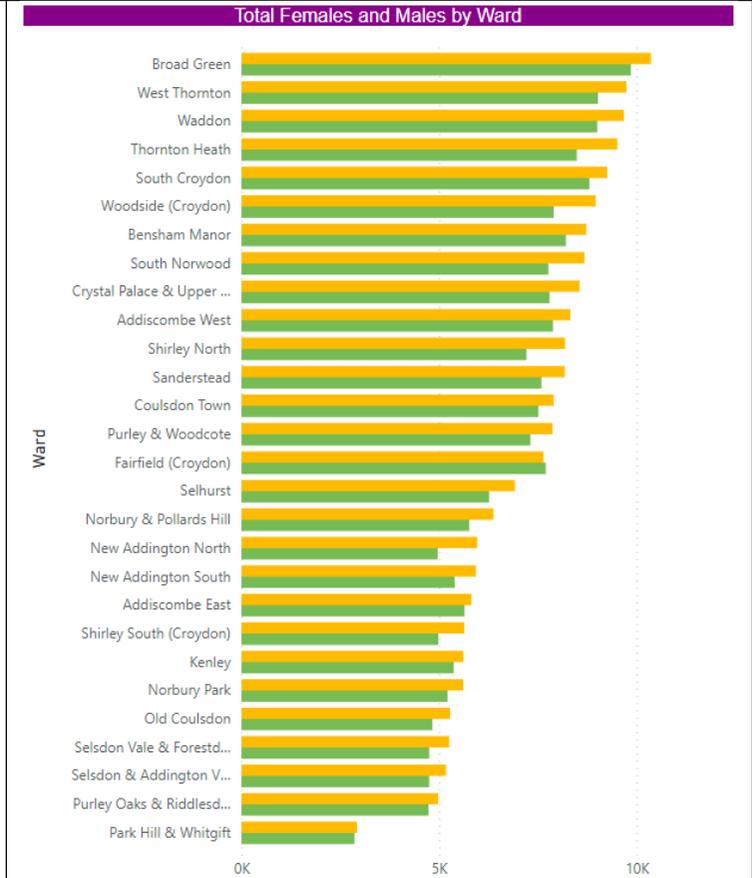
51.98%

48.02%

Median Gender Pay Gap by Age



The to reflect the number of residents not just the percentage split, this following chart shows total number of residents.

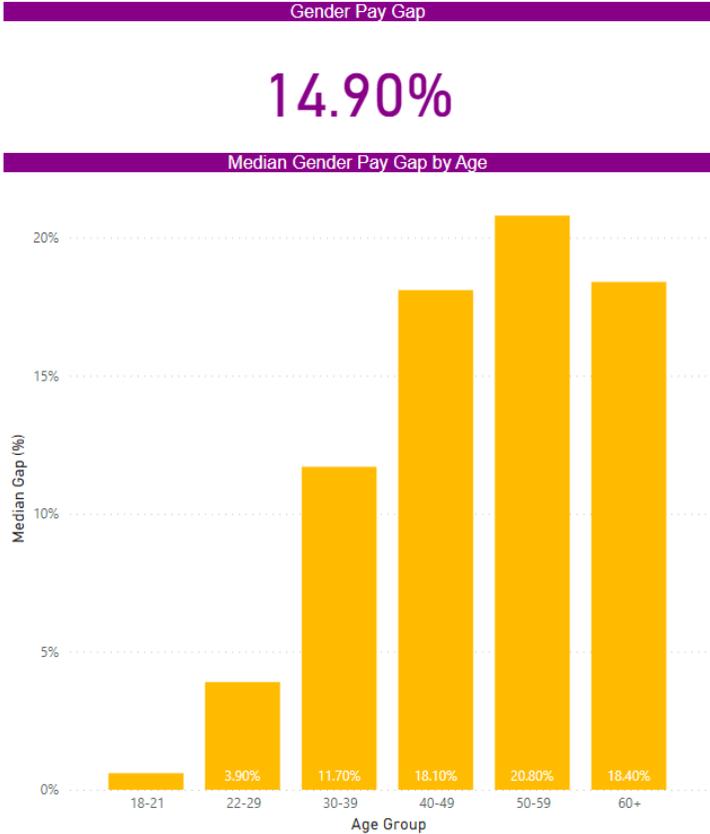


With the split of females just out-weighting males it can be determined that so far these equal impact to males and females as this scheme places no weight or eligibility criteria on sex.

However, when reviewing the elements of the scheme that do have criteria set against them, income, it is known from the data below (ONS Gender Pay Gap 2022) that males will be sooner excluded that females due to males receiving higher levels of remuneration when compared to females in the same field.

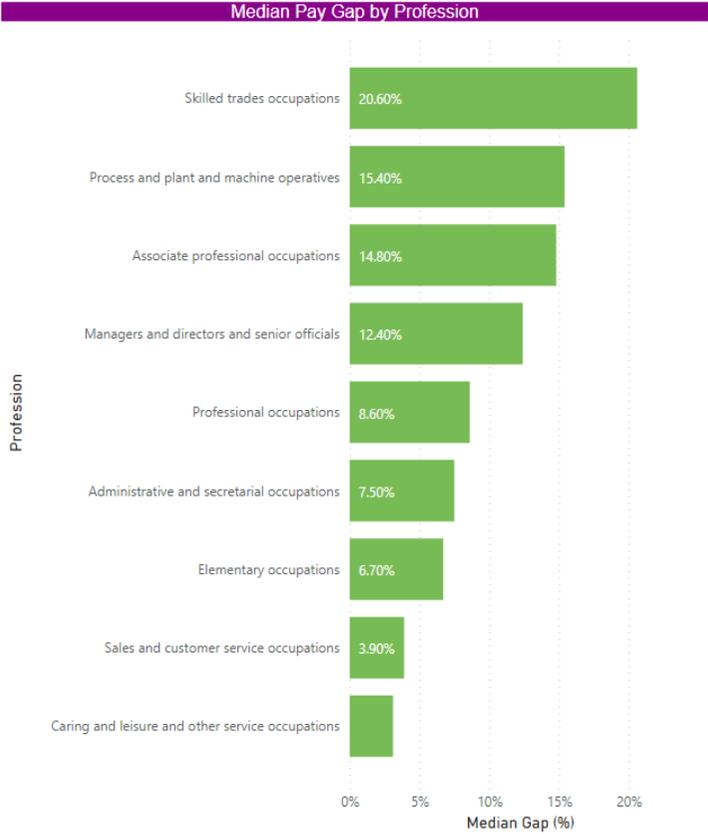
This is further confirmed when looking at age of males and females as well.

This first metric and chart shows that males are earning 14.9% more income for the same employment as women. When looked at by age it is clear to see that females under 30 are paid closer to 4% less than males and females over 40 are paid closed to 20% less than males. Based on this is it could be said that employed males over 40 are likely to be earning more than females and therefore sooner excluded from this scheme.



However, if looking at the pay gap on an occupation bases rather than an age basis there are certain professions where the gap is reduced to nil, such as retail work and bar work. The chart below shows that

occupations like skilled trades and process/plan and machine operators are paid 15-20% more if the employee is male.

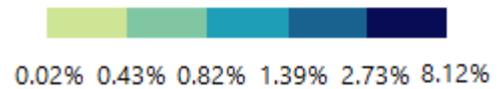
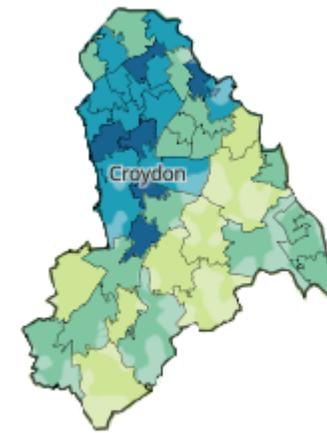


The ONS data does go on to confirm that there are certain occupations such as medical secretaries, information technology trainer, chartered surveyors and dancers or choreographers which are paid at a higher rate to females to males.

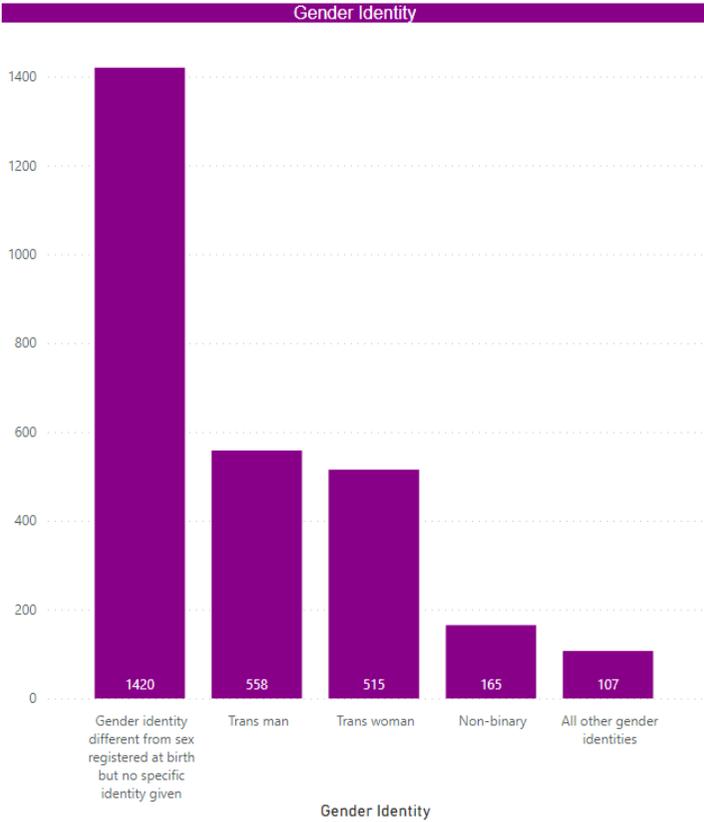
Looking at household composition would also need to be considered to balance income limits fairly. For example, a “male-female” household would have equal income opportunity to other “male-female” households. “Male-male” households would have higher income

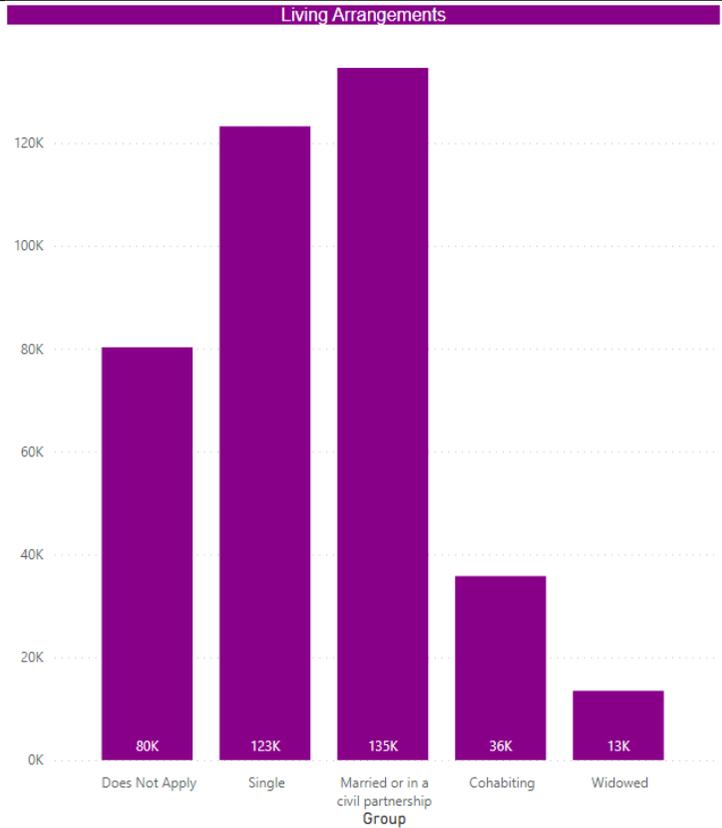
			<p>opportunity than “male-female” and “female-female” households.</p> <p>It can be concluded then that depending not only on sex, but sex, age, occupation and household composition can determine a balance of income allowances for not just different sexes but based on these 4 factors.</p> <p>However, the practicalities of completing such activities may be considered burdensome for the administration of this scheme and confusing for the resident to understand what their entitlement to the scheme may be.</p>
Gender Reassignment	<ul style="list-style-type: none"> • None identified that positively impact this group. 	<ul style="list-style-type: none"> • None identified that negatively impact this group. 	<p>Croydon’s available data for Gender Reassignment comes only from the ONS Census 2021.</p> <p>From that data 0.89% of Croydon residents identify as a gender different from sex registered at birth.</p> <p>With higher populations in Central Croydon and North Croydon, area to note are Broad Green & Waddon (1.86%), Purely North (1.56%), Selhurst South & West Croydon (1.49%) and Thornton Heath North West (1.48%).</p> <p>This can be seen from the map shown below.</p>

Gender Identity Different from Birth

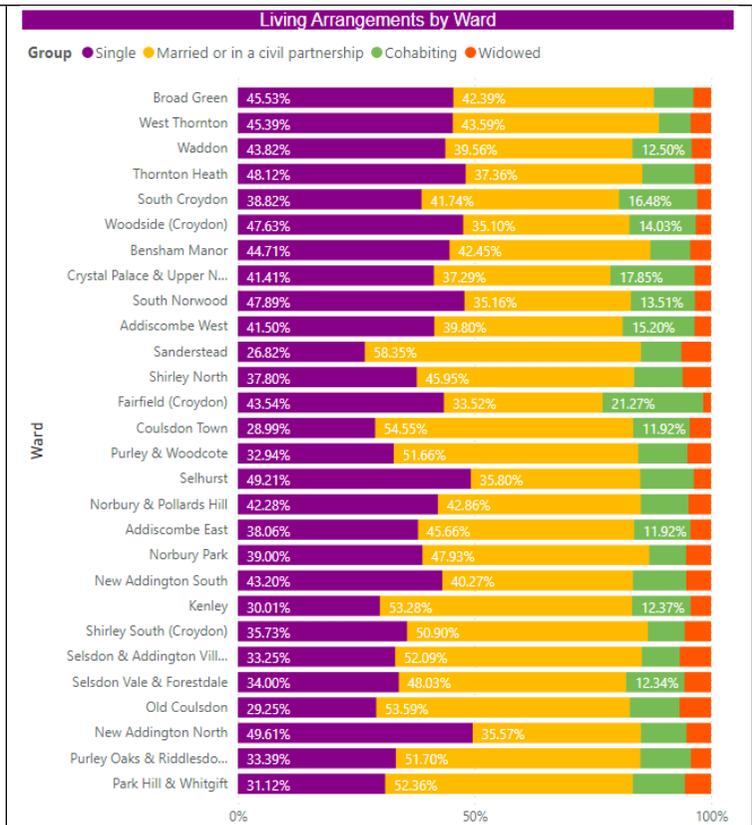


A further breakdown can be seen from the ONS data of transgender and non-binary groups as well.

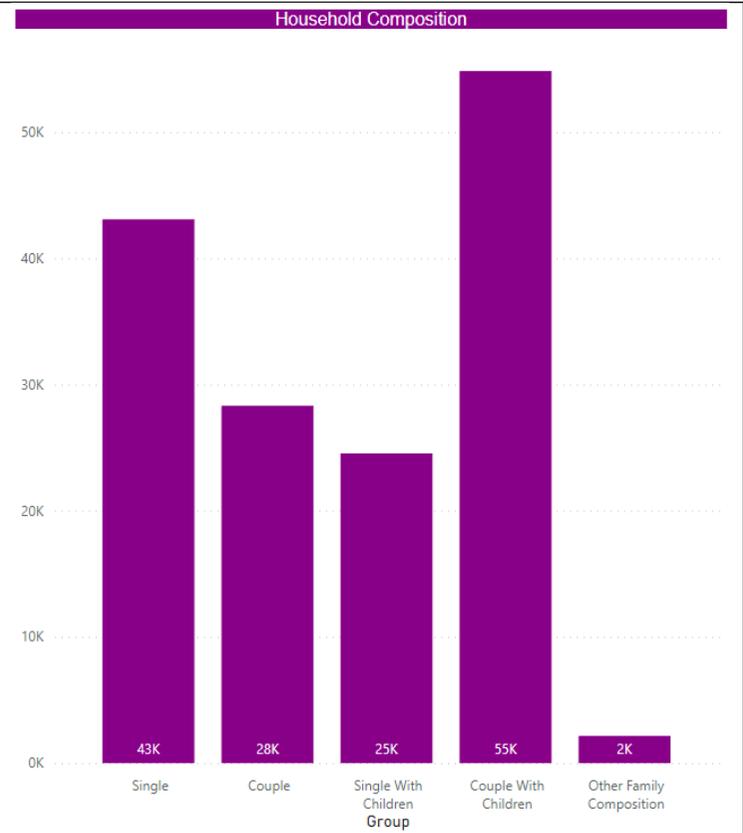
			 <p>Gender Identity</p> <table border="1"> <thead> <tr> <th>Gender Identity</th> <th>Count</th> </tr> </thead> <tbody> <tr> <td>Gender identity different from sex registered at birth but no specific identity given</td> <td>1420</td> </tr> <tr> <td>Trans man</td> <td>558</td> </tr> <tr> <td>Trans woman</td> <td>515</td> </tr> <tr> <td>Non-binary</td> <td>165</td> </tr> <tr> <td>All other gender identities</td> <td>107</td> </tr> </tbody> </table> <p>However, this scheme places no weight or eligibility criteria on a person gender identity and therefore expect to make no negative or positive impacts.</p>	Gender Identity	Count	Gender identity different from sex registered at birth but no specific identity given	1420	Trans man	558	Trans woman	515	Non-binary	165	All other gender identities	107
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Marriage or Civil Partnership	<ul style="list-style-type: none"> None identified that positively impact this group. 	<ul style="list-style-type: none"> None identified that negatively impact this group. 	<p>The council does not hold data about Marriage or Civil Partnerships for the purposes of administering council tax, however, ONS data is available for the living arrangements of the borough.</p> <p>From the below it can be seen that the majority of Croydon residents are married, in civil partnerships or co-habiting.</p>												



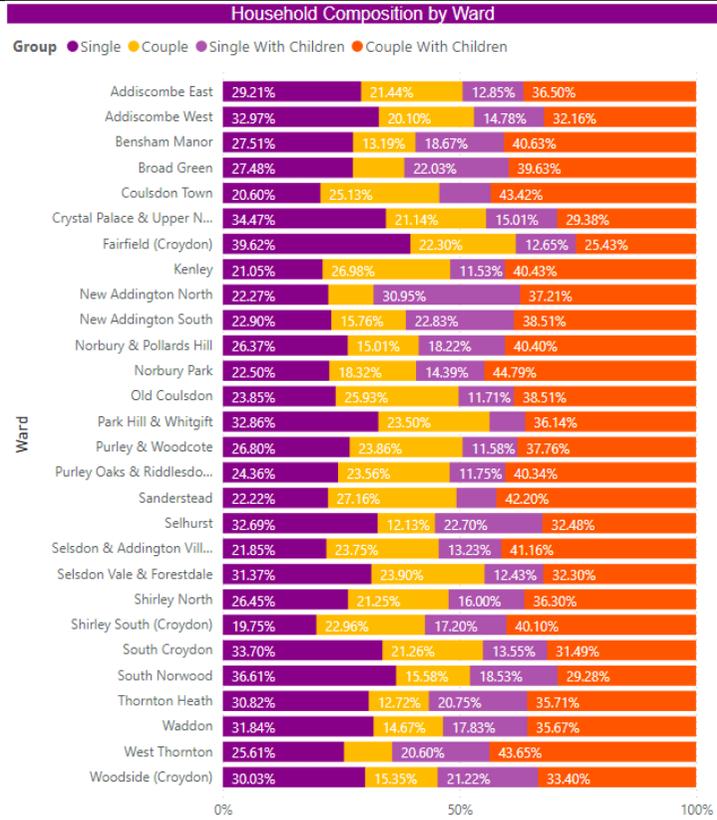
Broken into wards and excluding those that answered the census “do not apply”, it can be seen that there are high rates of single living arrangements in Fairfield, Thornton Heath, Selhurst and New Addington North.



Further to this, a review has also been completed of the household composition data from the ONS which shows that the majority of households in Croydon are couples or couples with children.



Breaking this down to borough wards the areas of high singles without children, which are proposed to be excluded from this scheme, are Fairfield, Selhurst and South Norwood.



Originally it looked as though New Addington North would see some exclusion but when looking at the household composition a lot of singles are likely to be included as they are single parent families.

Religion or belief

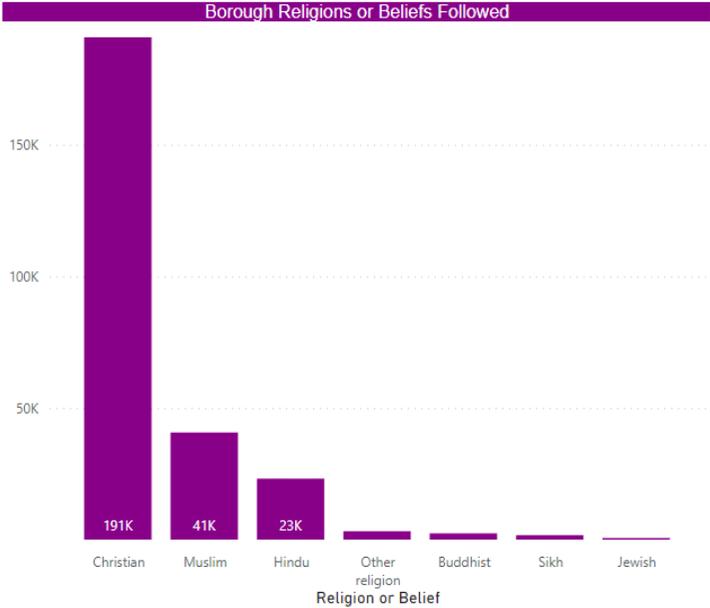
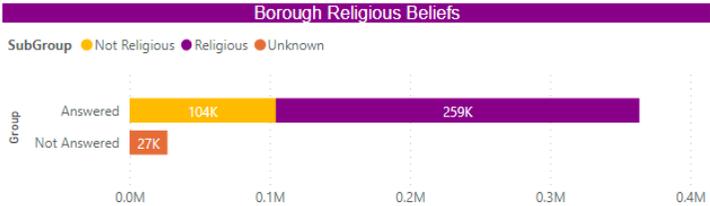
- None identified that positively impact this group.

- None identified that negatively impact this group.

Croydon does not need to hold religious or belief data for the purposes of administering council tax but must consider the impacts of these groups when making decisions on how it is to administer it.

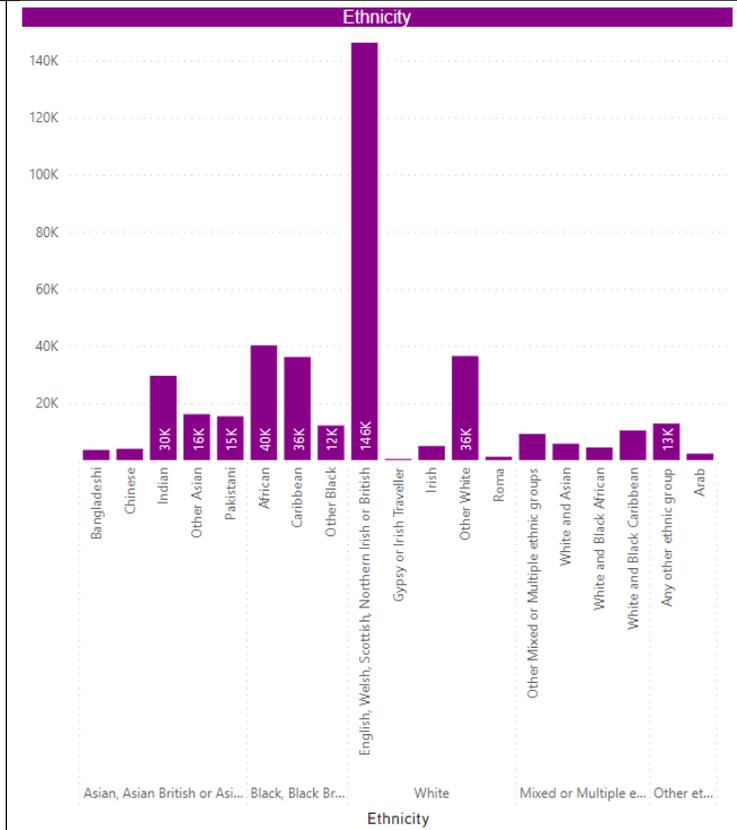
Looking to the ONS Census data for Croydon it can be said that of the 390k respondents 93% provided religious or belief answers.

Of those that answered in Croydon 29% have declared they are not religious. Compared with 71% (259k) of residents stating they do hold a religious belief. The chart below shows that breakdown and what religion or belief those that answered follow.

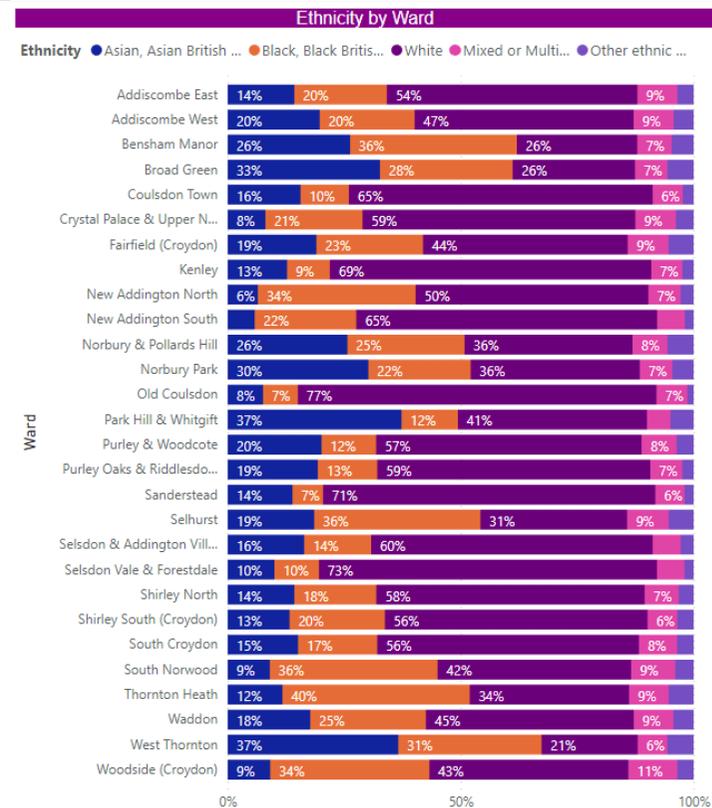


Breaking this down to specific religions followed in each ward, as the chart above would indicate there is always a strong Christian presence in every ward.

			<p style="text-align: center;">Living Arrangements by Ward</p> <p>Religion ● Christian ● Buddhist ● Hindu ● Jewish ● Muslim ● Sikh ● Other religion</p> <table border="1"> <thead> <tr> <th>Ward</th> <th>Christian</th> <th>Buddhist</th> <th>Hindu</th> <th>Jewish</th> <th>Muslim</th> <th>Sikh</th> <th>Other religion</th> </tr> </thead> <tbody> <tr><td>Addiscombe East</td><td>78%</td><td></td><td>7%</td><td></td><td>13%</td><td></td><td></td></tr> <tr><td>Addiscombe West</td><td>69%</td><td></td><td>12%</td><td></td><td>16%</td><td></td><td></td></tr> <tr><td>Bensham Manor</td><td>65%</td><td></td><td>10%</td><td></td><td>22%</td><td></td><td></td></tr> <tr><td>Broad Green</td><td>59%</td><td></td><td>17%</td><td></td><td>22%</td><td></td><td></td></tr> <tr><td>Coulsdon Town</td><td>76%</td><td></td><td>11%</td><td></td><td>10%</td><td></td><td></td></tr> <tr><td>Crystal Palace & Upper N...</td><td>81%</td><td></td><td></td><td></td><td>12%</td><td></td><td></td></tr> <tr><td>Fairfield (Croydon)</td><td>69%</td><td></td><td>10%</td><td></td><td>16%</td><td></td><td></td></tr> <tr><td>Kenley</td><td>79%</td><td></td><td>9%</td><td></td><td>9%</td><td></td><td></td></tr> <tr><td>New Addington North</td><td>81%</td><td></td><td></td><td></td><td>15%</td><td></td><td></td></tr> <tr><td>New Addington South</td><td>87%</td><td></td><td></td><td></td><td>9%</td><td></td><td></td></tr> <tr><td>Norbury & Pollards Hill</td><td>65%</td><td></td><td>7%</td><td></td><td>24%</td><td></td><td></td></tr> <tr><td>Norbury Park</td><td>59%</td><td></td><td>9%</td><td></td><td>28%</td><td></td><td></td></tr> <tr><td>Old Coulsdon</td><td>88%</td><td></td><td></td><td></td><td></td><td></td><td></td></tr> <tr><td>Park Hill & Whitgift</td><td>52%</td><td></td><td>27%</td><td></td><td>16%</td><td></td><td></td></tr> <tr><td>Purley & Woodcote</td><td>71%</td><td></td><td>11%</td><td></td><td>13%</td><td></td><td></td></tr> <tr><td>Purley Oaks & Riddlesdo...</td><td>74%</td><td></td><td>11%</td><td></td><td>12%</td><td></td><td></td></tr> <tr><td>Sanderstead</td><td>80%</td><td></td><td>9%</td><td></td><td>8%</td><td></td><td></td></tr> <tr><td>Selhurst</td><td>71%</td><td></td><td>8%</td><td></td><td>19%</td><td></td><td></td></tr> <tr><td>Selsdon & Addington Vill...</td><td>76%</td><td></td><td>9%</td><td></td><td>12%</td><td></td><td></td></tr> <tr><td>Selsdon Vale & Forestdale</td><td>83%</td><td></td><td>6%</td><td></td><td>9%</td><td></td><td></td></tr> <tr><td>Shirley North</td><td>78%</td><td></td><td>9%</td><td></td><td>11%</td><td></td><td></td></tr> <tr><td>Shirley South (Croydon)</td><td>76%</td><td></td><td>7%</td><td></td><td>14%</td><td></td><td></td></tr> <tr><td>South Croydon</td><td>76%</td><td></td><td>9%</td><td></td><td>12%</td><td></td><td></td></tr> <tr><td>South Norwood</td><td>81%</td><td></td><td></td><td></td><td>14%</td><td></td><td></td></tr> <tr><td>Thornton Heath</td><td>78%</td><td></td><td></td><td></td><td>17%</td><td></td><td></td></tr> <tr><td>Waddon</td><td>72%</td><td></td><td>9%</td><td></td><td>15%</td><td></td><td></td></tr> <tr><td>West Thornton</td><td>54%</td><td></td><td>16%</td><td></td><td>27%</td><td></td><td></td></tr> <tr><td>Woodside (Croydon)</td><td>82%</td><td></td><td></td><td></td><td>13%</td><td></td><td></td></tr> </tbody> </table> <p>This scheme and policy makes no direct relation between award and religious beliefs and therefore is considered not to benefit or disadvantage anyone based on their beliefs.</p>	Ward	Christian	Buddhist	Hindu	Jewish	Muslim	Sikh	Other religion	Addiscombe East	78%		7%		13%			Addiscombe West	69%		12%		16%			Bensham Manor	65%		10%		22%			Broad Green	59%		17%		22%			Coulsdon Town	76%		11%		10%			Crystal Palace & Upper N...	81%				12%			Fairfield (Croydon)	69%		10%		16%			Kenley	79%		9%		9%			New Addington North	81%				15%			New Addington South	87%				9%			Norbury & Pollards Hill	65%		7%		24%			Norbury Park	59%		9%		28%			Old Coulsdon	88%							Park Hill & Whitgift	52%		27%		16%			Purley & Woodcote	71%		11%		13%			Purley Oaks & Riddlesdo...	74%		11%		12%			Sanderstead	80%		9%		8%			Selhurst	71%		8%		19%			Selsdon & Addington Vill...	76%		9%		12%			Selsdon Vale & Forestdale	83%		6%		9%			Shirley North	78%		9%		11%			Shirley South (Croydon)	76%		7%		14%			South Croydon	76%		9%		12%			South Norwood	81%				14%			Thornton Heath	78%				17%			Waddon	72%		9%		15%			West Thornton	54%		16%		27%			Woodside (Croydon)	82%				13%		
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Race	<ul style="list-style-type: none"> None identified that positively impact this group. 	<ul style="list-style-type: none"> Different races have different earnings outcomes in respect of the ethnicity pay gap a flat maximum income limit for all would not take this into account. 	<p>Croydon is a diverse borough with many ethnic groups being represented throughout.</p> <p>The latest data from the ONS reveals that the group with the highest number of residents is White, which contains a few different groups as detailed in the chart below.</p>																																																																																																																																																																																																																																								



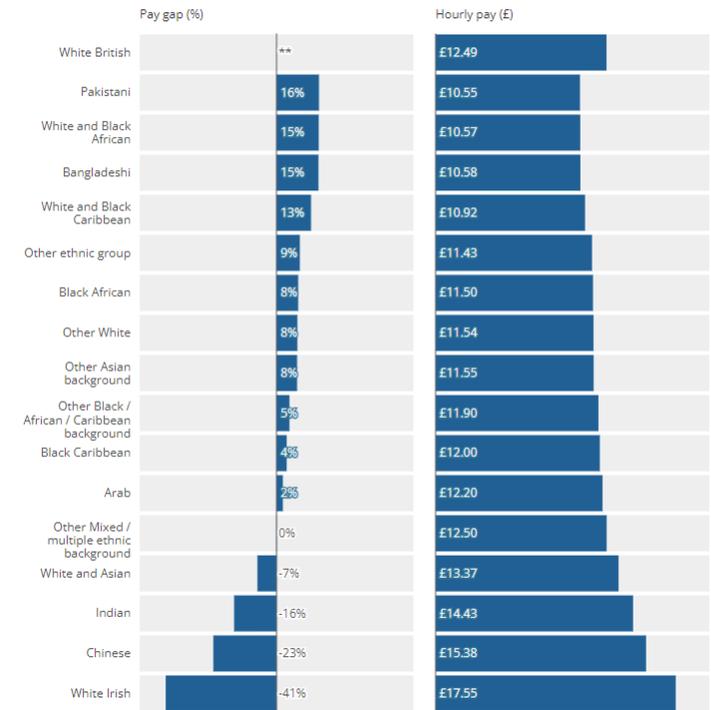
To determine if this is a representative picture of all areas of Croydon this data has also been reviewed at a ward level as well. This is shown in the chart below.



As mentioned, this scheme does make no reference to ethnicity in terms of eligibility but does make reference to income.

The below shows the ONS 2019 annual population survey which highlights that many ethnicities, when compared to the White British population are earning less at the same job. There are some ethnicities where earnings are higher than that of the White British counterpart.

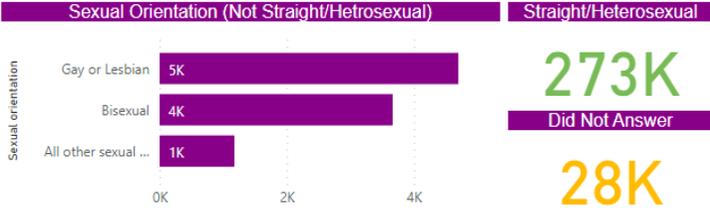
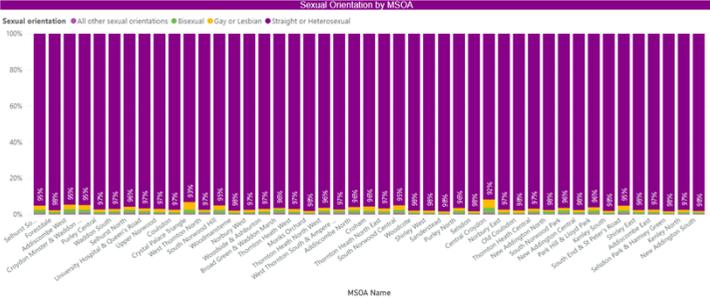
Median hourly pay and pay gap, 17 ethnic groups, England and Wales, 2019



Source: Office for National Statistics - Annual Population Survey

This data is representative of the entire population, not just Croydon, an assumption has to be made that Croydon is on par with national averages. If that is the case, then setting different maximum incomes depending on ethnicity would balance the scheme more evenly ensuring no one is disadvantaged by their earnings opportunity based on ethnicity.

However, this might also be deemed inappropriate as the balance would see those with higher incomes, for whatever reason, be permitting higher earnings before becoming ineligible. If a resident is earning more, it would be difficult to argue that higher levels of support are required, assuming equality in all other aspects.

<p>The Sexual Orientation</p>	<ul style="list-style-type: none"> None identified that positively impact this group. 	<ul style="list-style-type: none"> None identified that negatively impact this group. 	<p>The ONS Census from 2021 is the available data for Croydon on sexual orientation.</p> <p>From this data a summary of Croydon is as follows:</p>  <p>The data available from the ONS does not breakdown by ward but has geographical data at a lower level. That detail is displayed below.</p>  <p>As this scheme does focus on a households income it would be right to review the earning opportunity depending on sexual orientation. However, finding reliable data from government, or nation sources, at the same level of depth that has been applied to gender and ethnicity pay gaps has been difficult for sexual orientation pay gaps.</p> <p>There are individual companies and organisation that have made assessments of their businesses and published their findings.</p>
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			<p>For example PwC noted a 20.4% gap in their annual report. Annual Report 2022 - Inclusion and diversity - PwC UK</p> <p>There are other reports that have been published globally and in the UK that support this picture that gay, lesbian and bi-sexual workers are earning less than their straight counterparts.</p> <p>However, as with the comments made in ethnicity this scheme is focused on income, and if earning a lower income entitles someone to support it would be difficult to put a case forward that someone with higher income should have a higher maximum income threshold before becoming ineligible for this scheme.</p> <p>Other factors may be considered in making this assessment, for example household composition may increase maximum income, rather than sexual orientation.</p>
Pregnancy or Maternity	<ul style="list-style-type: none"> • None identified that positively impact this group. 	<ul style="list-style-type: none"> • None identified that negatively impact this group. 	<p>Unless a resident is claiming Council Tax Support and declares their maternity income the council does not have a way of identifying, or sizing, the number of residents that are pregnant or on maternity.</p>

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
All research and data is included in the "EQIA Data Pack"	Data pack included	

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

Table 3 – Impact scores

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

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 is a maximum income limit to the scheme based on household composition. The older someone is the higher their income is likely to be. Therefore, it could be argued that the older someone is the less	The evidence shown that the resident earns more depending on their age, disability, sex and race should not need to be mitigated by this scheme.		

Equality Analysis

	likely they are to be eligible for this scheme.	This scheme is aimed at supporting low-income households who will struggle with the rise in council tax demands. If allowances are made to increase maximum earning limits based on these criteria the scheme would be protecting higher earners.		
Age	There is a maximum income limit to the scheme based on household composition. The older someone is the higher their income is likely to be. Therefore, it could be argued that the older someone is the less likely they are to be eligible for this scheme.	It would be inappropriate the attempt to mitigate this impact based on the principles of this scheme.		
Sex (gender)	As males are typically remunerated at a higher rate than females depending on household composition a male household would be ineligible for the scheme sooner than females.	However, if a resident would approach the council and they are not eligible under this scheme there are alternative Section 13A support schemes, which residents could be signposted to.		
Race	Different races have different earning potential a flat maximum income limit for all would not take this into account.			
Sexual orientation	None			
Gender reassignment	None			
Religion or belief	None			
Pregnancy or maternity	None			
Marriage/civil partnership	None			

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. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</p> <p>Reason:</p> <p>The scheme has no potential for discrimination in itself, by defining a set of rules bases on maximum income and household composition it would be considered fair for all. It recognises that those with larger households will have higher needs and therefore higher incomes. It recognises that certain benefit incomes are for specific needs and will not be counted towards net weekly income such as many disability benefits and child benefit, in line with the Council Tax Support Scheme. It also recognises that different personal statuses need to be taken in to account such as disability status, a disabled resident may have higher needs and therefore a higher income, as mentioned many disabled benefits will be disregarded for the purposes of calculating income and further to that disabled residents will access to the higher rates of maximum income limits before any other resident group.</p>	X
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. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</p>	
Continue the proposed change	<p>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.</p>	
Stop or amend the	<p>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.</p>	

Equality Analysis

proposed change		
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title:

7. Sign-Off

Officers that must approve this decision		
Equalities Lead	Name: Denise McCausland	Date: 20 March 2023
	Position: Equality Programme Manager	
Director	Name:	Date:
	Position:	