

Equality Analysis Form

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	Housing
Title of proposed change	Council Housing Asset Management Strategy 2024-2029
Name of Officer carrying out Equality Analysis	Kevin Hartshorn

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 Housing Asset Management strategy is designed to align all key asset management activities in a direction that moves towards meeting our Council Housing mission and vision:

Vision: Creating great homes, places, and communities to enhance life opportunities

Mission: working with resident, partners, and businesses to provide safe and warm homes in thriving sustainable communities

The aim of our Housing Asset Management Strategy 2024-2029 is to deliver the following objectives detailed in the [Mayor's Business Plan 2022- 2026](#):

- Get a grip on the finances and make the Council financially sustainable.
- Become a council which listens to, respects, and works in partnership with Croydon's diverse communities and businesses.
- Strengthen collaboration and joint working with partner organisations and the voluntary, community and faith sectors.
- Ensure good governance is embedded and adopt best practice.
- Develop our workforce to deliver in a manner that respects the diversity of our communities.
- Children and young people in Croydon have the chance to thrive, learn and fulfil their potential
- Croydon is a cleaner, safer and healthier place, a borough we're proud to call home
- Invest in council homes to drive up standards and develop a more responsive and effective housing service
- People can lead healthier and independent lives for longer

This Strategy is part of the strategic framework for the Housing Transformation Programme, a programme of individual projects which aim to improve and transform our housing services. Its purpose is to be a critical business tool that ensures performance is measurable and acts as a framework for medium to long term decisions around our stock.

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.

The creation of the Council Housing Asset Management Strategy will be accompanied by the development of equalities impact assessments at a project level, where necessary, which will be developed in conversation with the Equalities Programme Manager. The project managers responsible for the delivery of projects within the operational delivery plan will ensure the EQIAs produced accurately assess the potential impact on vulnerable groups, and groups that share protected characteristics. All EQIAs produced will be treated as living documents and will be updated when data becomes available and new equality objectives identified where appropriate.

We also recognise that we don't currently collect useful or accurate data on our residents, work is underway to consider how we can better capture and collect data of our residents to ensure that changes to our services are data driven.

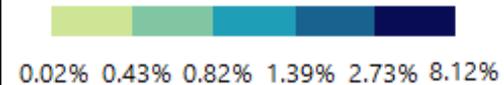
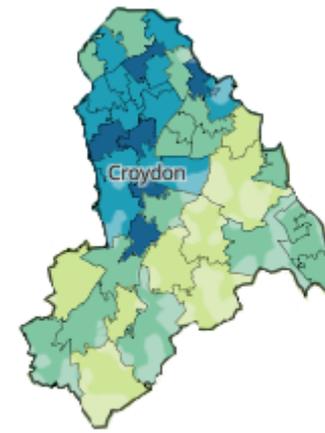
Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	The Council Housing Asset Management Strategy will aim to focus on the needs of The Council Housing residents but will not directly impact on this characteristic. However, it will have due regard for the aims of the Equality Duty as part of the decision-making process. Any decision will consider the impact on people who share the	None	<p>Census 2021 data shows the LB Croydon is the most populous borough in London with approximately 390,800 residents.</p> <p>The data tells us that there are approximately 80,321 residents aged 15 and under, 257,325 residents aged 16 to 64 years old, and 53,072 residents aged 65 years and older.</p> <p>The data shows that Croydon has the highest number of 0–19-year-olds in London.</p>

	<p>protected characteristics before any decision is made.</p> <p>Individual delivery plans will have more in-depth consideration of the impact any changes or actions will have on the protected characteristics as it will be clearly the likely impact.</p>		<p>Since 2011, Croydon has seen an ageing population, with a 19.6% growth in 65+ year olds (Census 2021).</p> <p>Croydon's projected growth from 2022-2041 is predicted to be 7.9% (GLA 2020 based housing led projections).</p>															
Disability	<p>Residents with disabilities or parents of children with disabilities may be treated more favourably than others in relation to housing improvements. This will not amount to discrimination in relation to the Equality Act 2010.</p> <p>Individual delivery plans will have more in-depth consideration of the impact any changes or actions will have on the protected characteristics as it will be clearly the likely impact.</p>	None	<table border="1"> <thead> <tr> <th>Disability</th> <th>Survey respondents</th> <th>Census 2021</th> </tr> </thead> <tbody> <tr> <td>No response</td> <td>0.0%</td> <td>0.0%</td> </tr> <tr> <td>Yes</td> <td>2.8%</td> <td>14.4%</td> </tr> <tr> <td>No</td> <td>88.9%</td> <td>85.5%</td> </tr> <tr> <td>Prefer not to say</td> <td>8.3%</td> <td>0.0%</td> </tr> </tbody> </table>	Disability	Survey respondents	Census 2021	No response	0.0%	0.0%	Yes	2.8%	14.4%	No	88.9%	85.5%	Prefer not to say	8.3%	0.0%
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Sex	<p>The Council Housing Asset Management Strategy will aim to focus on the needs of The Council Housing residents but will not directly impact on this characteristic. However, it will have due regard for the aims of the Equality Duty as part of the decision making process. Any decision will consider the impact on people who share the</p>	None	<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>															

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Individual delivery plans will have more in-depth consideration of the impact any changes or actions will have on the protected characteristics as it will be clearly the likely impact.

Gender Identity Different from Birth



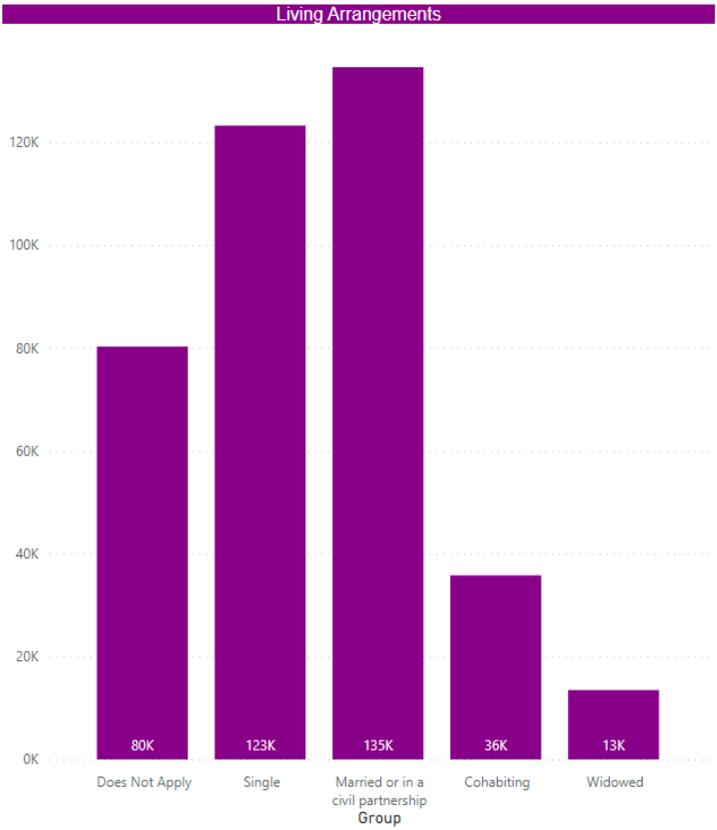
Gender

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Individual delivery plans will have more in-depth consideration of the impact any changes or actions will have on the protected characteristics as

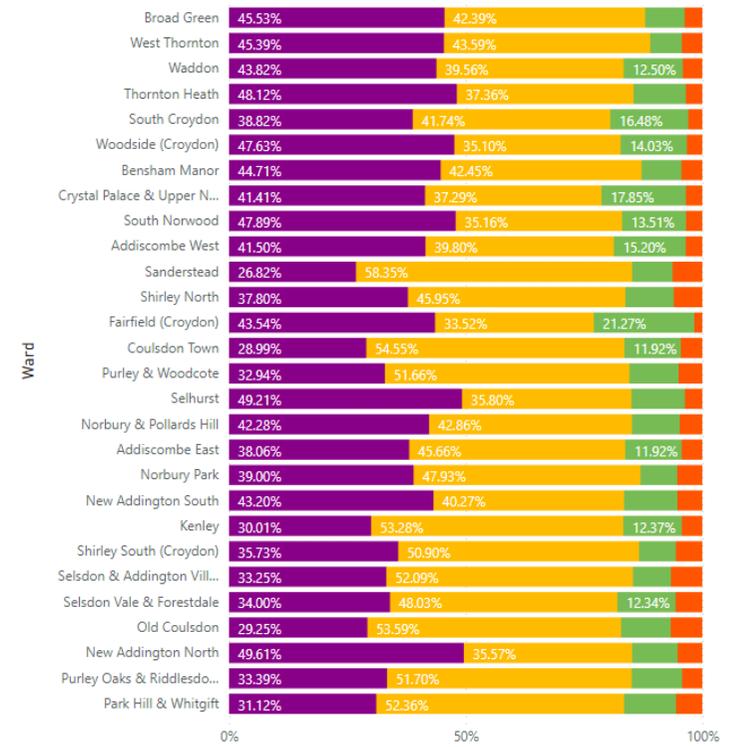
None

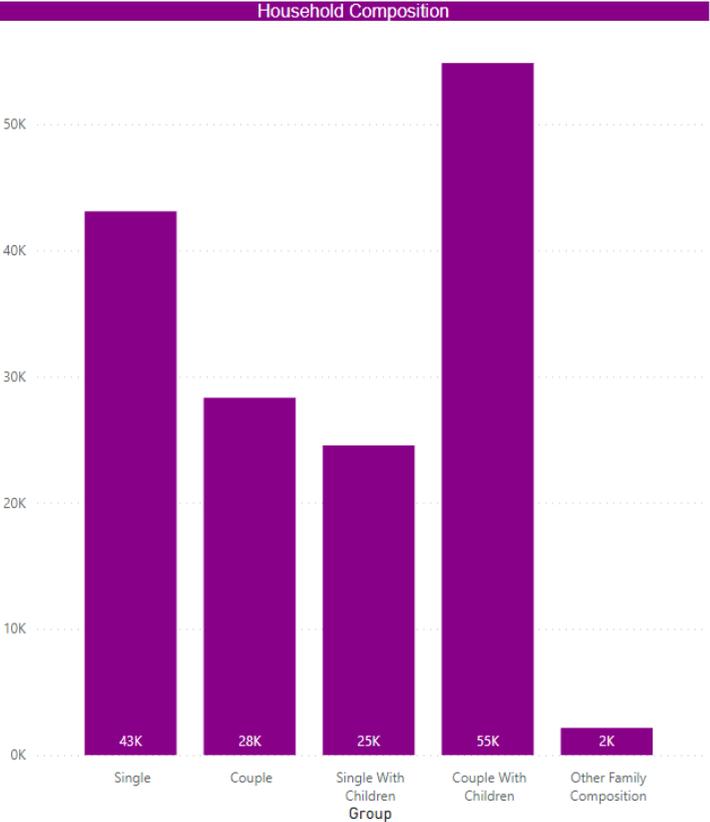
Sex	Survey respondents	Census 2021
No response	0.0%	0.0%
Female	52.6%	52.0%
Male	39.5%	48.0%
Prefer not to say	7.9%	0.0%

	it will be clearly the likely impact.														
Marriage or Civil Partnership	<p>The Council Housing Asset Management Strategy will aim to focus on the needs of The Council Housing residents but will not directly impact on this characteristic. However, it will have due regard for the aims of the Equality Duty as part of the decision making process. Any decision will consider the impact on people who share the protected characteristics before any decision is made.</p> <p>Individual delivery plans will have more in-depth consideration of the impact any changes or actions will have on the protected characteristics as it will be clearly the likely impact.</p>	None	<p>From the below it can be seen that the majority of Croydon residents are married, in civil partnerships or co-habiting.</p>  <table border="1"> <caption>Living Arrangements</caption> <thead> <tr> <th>Living Arrangement</th> <th>Number of Residents</th> </tr> </thead> <tbody> <tr> <td>Does Not Apply</td> <td>80K</td> </tr> <tr> <td>Single</td> <td>123K</td> </tr> <tr> <td>Married or in a civil partnership</td> <td>135K</td> </tr> <tr> <td>Cohabiting</td> <td>36K</td> </tr> <tr> <td>Widowed</td> <td>13K</td> </tr> </tbody> </table> <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</p>	Living Arrangement	Number of Residents	Does Not Apply	80K	Single	123K	Married or in a civil partnership	135K	Cohabiting	36K	Widowed	13K
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Living Arrangements by Ward

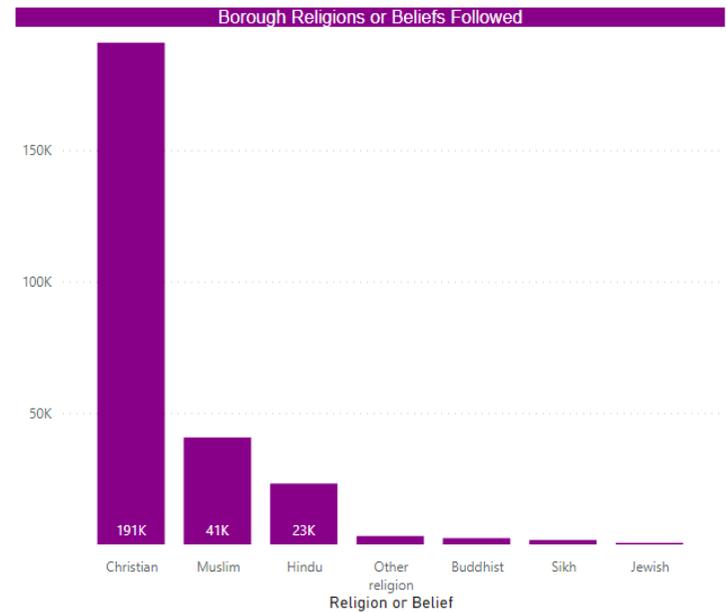
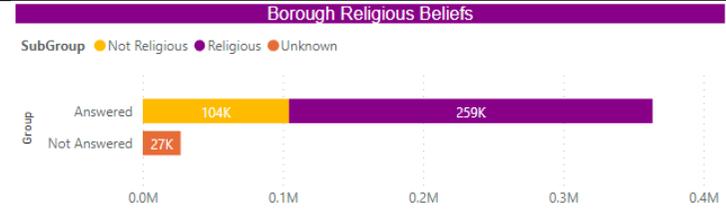
Group ● Single ● Married or in a civil partnership ● Cohabiting ● Widowed



			<p style="text-align: center;">Household Composition</p>  <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Household Type</th> <th>Count</th> </tr> </thead> <tbody> <tr> <td>Single</td> <td>43K</td> </tr> <tr> <td>Couple</td> <td>28K</td> </tr> <tr> <td>Single With Children Group</td> <td>25K</td> </tr> <tr> <td>Couple With Children</td> <td>55K</td> </tr> <tr> <td>Other Family Composition</td> <td>2K</td> </tr> </tbody> </table> <p>Breaking this down to borough wards the areas of high singles without children, are Fairfield, Selhurst and South Norwood.</p>	Household Type	Count	Single	43K	Couple	28K	Single With Children Group	25K	Couple With Children	55K	Other Family Composition	2K
Household Type	Count														
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Religion or belief	The Council Housing Asset Management Strategy will aim to focus on the needs of The Council Housing residents but will not directly impact on this characteristic. However, it will have due regard for the aims of the Equality Duty as part of the decision making process. Any decision will consider the impact	None	29% of Croydon residents 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.												

on people who share the protected characteristics before any decision is made.

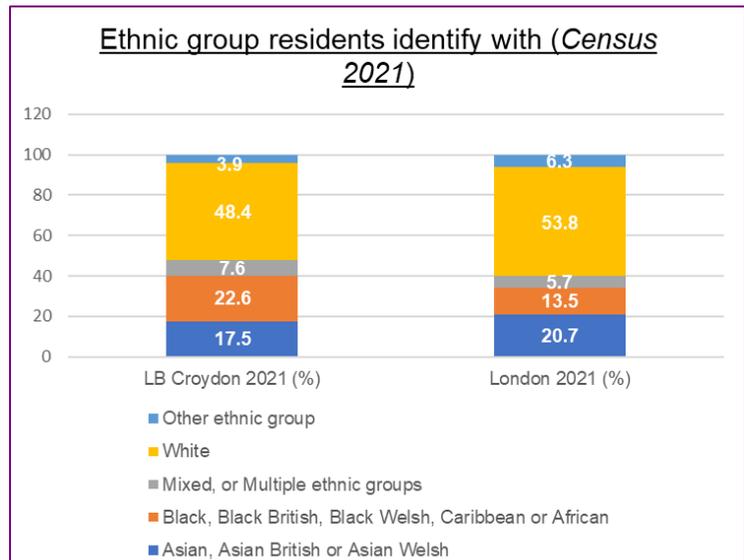
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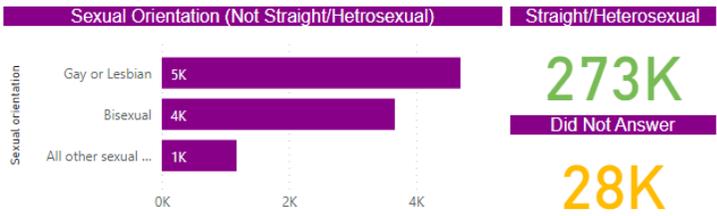


Race

The Council Housing Asset Management Strategy will aim to focus on the needs of The Council Housing residents but will not directly impact on this characteristic. However, it will have due regard for the aims of the Equality Duty as part of the decision making process. Any decision will consider the impact on people who share the protected characteristics before any decision is made.

None



	<p>Individual delivery plans will have more in-depth consideration of the impact any changes or actions will have on the protected characteristics as it will be clearly the likely impact.</p>														
<p>Sexual Orientation</p>	<p>The Council Housing Asset Management Strategy will aim to focus on the needs of The Council Housing residents but will not directly impact on this characteristic. However, it will have due regard for the aims of the Equality Duty as part of the decision making process. Any decision will consider the impact on people who share the protected characteristics before any decision is made.</p> <p>Individual delivery plans will have more in-depth consideration of the impact any changes or actions will have on the protected characteristics as it will be clearly the likely impact.</p>	<p>None</p>	<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>  <table border="1"> <thead> <tr> <th>Sexual Orientation</th> <th>Count</th> </tr> </thead> <tbody> <tr> <td>Gay or Lesbian</td> <td>5K</td> </tr> <tr> <td>Bisexual</td> <td>4K</td> </tr> <tr> <td>All other sexual ...</td> <td>1K</td> </tr> <tr> <td>Straight/Heterosexual</td> <td>273K</td> </tr> <tr> <td>Did Not Answer</td> <td>28K</td> </tr> </tbody> </table>	Sexual Orientation	Count	Gay or Lesbian	5K	Bisexual	4K	All other sexual ...	1K	Straight/Heterosexual	273K	Did Not Answer	28K
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<p>Pregnancy or Maternity</p>	<p>The Council Housing Asset Management Strategy will aim to focus on the needs of The Council Housing residents but will not directly impact on this characteristic. However, it will have due regard for the aims of the Equality Duty as part of the decision making process. Any decision will consider the impact on people who share the</p>	<p>None</p>													

	<p>protected characteristics before any decision is made.</p> <p>Individual delivery plans will have more in-depth consideration of the impact any changes or actions will have on the protected characteristics as it will be clearly the likely impact.</p>		
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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

<p>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:</p>		
Additional information needed and or Consultation Findings	Information source	Date for completion
<p style="text-align: center;">Engagement workshops and online survey</p> <p>The survey was responded to by the following groups:</p> <ul style="list-style-type: none"> • Tenant or leaseholder of Croydon Council: 36% (10) • Croydon Council Staff Member: 57% (16) • Other: 7% (2). <p>Feedback on draft priorities</p>	<p>Council Housing Asset managementStrategy Consultation</p>	<p>Jan/Feb 2024</p>

The principles of the AMS went out to consultation through an online survey questionnaire to Council housing residents and Council staff as well as an in-person workshop with engaged residents.

The survey asked respondents whether they agreed or disagreed with the principles. The online survey was live for eight weeks from 4 December to 31 January 2024 on Croydon's 'Get Involved' page and was pushed via online newsletter to staff and Councillors and directly to engaged residents. The online survey consultation received 38 responses showed full support for questions asked in relation to the first four principles and underlying objectives.

Survey responses regarding the draft principles and objectives are listed below; further detail is provided in Appendix five.

Principle One (warm, comfortable homes) - strongly agree or agree: 100%

Principle Two (% compliance) – strongly agree or agree: 100%

Priority Three (resident involvement) - strongly agree or agree: 97.4%

Priority Four (sustainability) - strongly agree or agree: 97.4%

For principle 5 (financial) we asked respondents to rank their priorities in balancing investment with affordability:

Investment priorities	Average rank
Making and maintaining our homes to be 100% Decent	3.19
Improving access to ensure homes are safe and compliant	3.75
Improving conditions of the home	4.39
Improving the thermal efficiency of our homes	4.86
Undertaking more work on a planned basis rather than a quick fix repair	4.86
Complete more works at the same time	5.61
Making estates and communities safer and greener	6.36
Disposing of homes that are costly to live in or maintain	6.61
Allowing more choice to residents on what happens and when, in their home	7.14
Concentrate on improving the appearance and safety of an estate	7.49
Other	10.13

In January 13 residents attended a workshop to to foster open dialogue and collaboration between the residents and the Council on the Asset Management Strategy. This forum provided an opportunity for residents to contribute their perspectives, enabling us to collectively enhance our approach to asset management for the benefit of the entire community. With a Resident Engagement Strategy in development, participants were invited to add their thoughts to the other 4 principles.

Further research

	Tenure type	Number
Council social social	HRA General Rent Tenure	13429
	HRA Leased and Managed Properties	339
	Croydon Affordable Tenancy	151
	Emergency + Temporary Accommodation	124
	Croydon Affordable Homes	96
	Serviced Tenancies	8
	Leaseholder	2561
	Total	16708

need to the future

Affordable housing - Croydon has a total of 13,429 homes for housing tenants. Croydon Council's homes can be broken down into the following property types:

- Homes: 5,056
- Bungalows: 235
- Flats & Maisonettes: 11,417

Housing need – included as we make sure our stock is suitable for

As of January 2023, there are approximately 6,979 households on Croydon Council's Housing Register which represents an increase of 5.9% since January 2022.

The average wait time for a Croydon Council property between 2016 and 2021 was five years and 11 months. The majority of households on the housing register are waiting for one-bedroom and two-bedroom properties.

Mixed – Asset data information/Census 2021 / GLA Rents Map / ONS / PRS

3.3 Impact scores

Example

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

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

Table 4 – Equality Impact Score

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

Key

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

Equality Analysis

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

Equality Analysis

4. Statutory duties

4.1 Public Sector Duties

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

Advancing equality of opportunity between people who belong to protected groups

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 no negative impact identified			
Race	There is no negative impact identified			
Sex (gender)	There is no negative impact identified			

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Gender reassignment	There is no negative impact identified			
Sexual orientation	There is no negative impact identified			
Age	There is no negative impact identified			
Religion or belief	There is no negative impact identified			
Pregnancy or maternity	There is no negative impact identified			
Marriage/civil partnership	There is no negative impact identified			

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>The work completed using the online survey and resident engagement workshop (above) shows that the Council Housing Asset Management Strategy was written using principles and feedback given by a range of tenants and that all tenants had this opportunity to have an input.</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>	

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Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.	
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 Date: 24 April 2024

7. Sign-Off

Officers that must approve this decision		
Equalities Lead	Name: Felisha Dussard	Date: 07/03/2024
	Position: Senior Communities Officer	
Director	Name: Sue Hanlon	Date: 7 March 2024
	Position: Interim Director Assets	