

Equality Impact Assessment

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

Name of the proposed change	Resident Engagement Strategy 2024-2029
Purpose of proposed change	The Council breached the Regulator of Social Housing Consumer Standards in 2021. (Regulatory Standard for Tenant Involvement and Empowerment Standard) now superseded by the Transparency, Influence and Accountability Standard. The Resident Engagement Strategy sets out how Croydon Council's tenants will hold the Council to account, provide assurance (or otherwise) that the consumer standards are being met, whilst drawing on the experiences of engaged residents to inform service improvement.
Is this a change to a policy, practice, or service?	Introduction of a Resident Engagement Strategy 2024-2029
Who has senior level responsibility for the proposed change?	Susmita Sen
Who is completing this assessment?	Mary Larbie
Indicate where your EQIA will be submitted to including date where known:	The EQIA will be submitted to Cabinet alongside the Draft strategy for Members' consideration and if appropriate, approval.

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

Is the proposed change likely to impact on any of the following? If there is no equality relevance for either go to Stage 7 and get sign off	☑ Communities☐ Employees
Is the impact on equality low, medium or high?	The Strategy will develop mechanisms that ensure that Croydon Council listens to the views, experiences, and contributions of all residents. In doing so, the Council are taking steps to understand residents' needs, barriers, and preferences. This will allow Croydon to:



	 Support our residents to engage. Develop engagement activities that make best use of traditional and new engagement methods. Provide opportunities designed for diversity and inclusion. Make being involved easy for residents. Increase opportunities for all staff to engage with residents. Over 200 involved and non-involved residents were invited to take part in the design of the Resident Engagement Strategy 2024 to 2029. As a result, residents have been involved in co-designing the strategy and the subsequent Resident Engagement Framework.
Summary of EQIA outcome:	Public authorities have a single public sector equality duty (PSED) under the Equality Act 2010 and have due regard to the need to promote equality. The Council is aware of its duty to: • eliminate any form of unlawful discrimination (including direct or indirect discrimination, harassment, victimisation, and any other conduct prohibited under the Act) • advance equality of opportunity between people who share a relevant characteristic and people who do not.
	 foster good relations between people who share a protected characteristic and people who do not. The EQIA has identified that there is a need to increase the 'voice' of three of the nine protected characteristics. The three groups being younger residents (age), disabled residents (disability), and global majority residents (race), driven by changes in population. Next steps are outlined in section five.



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

Eliminating discrimination, harassment, victimisation	The proposed changes will help identify, address, and eliminate discrimination, harassment, and victimisation.
Advancing equality of opportunity	The Council is committed to providing a wide range of opportunities for residents to be involved in the decision-making process. In doing so, we recognise the need to break down barriers to ensure that the profile of our involved residents reflects our resident population. The Strategy will develop mechanisms that ensure that we listen to the views and contributions of protected groups.
	Disability:
	The Census 2021 data also shows that 15.8% of residents in Croydon identify themselves as disabled under the Equality Act 2010. The challenge within Housing is to tailor our services to the particular and differing needs of these communities and increasing the knowledge we hold of these groups. For instances, we need to be better informed about the following:
	 What is the perception of our services held by residents with hearing or visual impairments.? With regards to mobility, what do residents receiving adaptations think about our services? What about the services we provide to those with mental health difficulties?
	The Council accepts that the term disabled represents a wide diaspora and will continue to develop means of communicating that are suitable for each group.
	Age:
	Our Consultations confirms that participation in Resident Engagement tends to increase with age and that there is low participation amongst the young. This is a problem experienced across social housing and is prevalent in



Croydon. To engage with the young and seek their views, we will explore alternative methodologies for engagement, such as digital means. The Council will work with Residents to develop ways in which we can involve young people. Our data tells us that Croydon has the highest number of 0-19 year olds in London. There are approximately 80,321 residents aged 15 and under, 257,325 residents aged 16 to 64 years old, and the likelihood is that this increasing youthful age profile is reflected on Croydon's housing stock .There is therefore likely to be a need to use a number of digital engagement tools

Croydon also has an increased profile of those who are over 65 with a 19.6% growth in that age group since 2011. Although this profile is well represented in traditional resident involvement structures, the Engagement Strategy will also consider how we consult successfully with those who are housed in our sheltered accommodation.

Race:

There is a disproportionate over representation of the Black community in terms of homelessness application,s meaning that our estates are likely to become more diverse over the next few years.

%	London	Croydon	Rest of England
White	31%	26%	75%
Black	29%	45%	6%
Asian	12%	12%	5%

The Resident Engagement Strategy recognises the need to increase our involvement with our changing communities' profiles.

Gender:

Anedoctal evidence suggests that Men, particularly those in a younger age category, are more reluctant to engage and the Strategy recognises this.

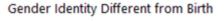
Nationally ,domestic abuse claimants rose from 23,920 in 2018/19 to 32,600 in 2021/22, and applications to the Family Justice Centre show this disprportionately affects women rose threefold since 2017 to over 2,000 in 2023 with Social Housing residents over represented in these figures. The Resident Engagement Strategy will involve educational events to alert residents to this growing problem.

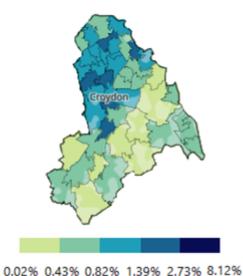


Gender identity:

From census data, 0.89% of Croydon residents identify as a gender different from sex registered at birth. With higher populations in Central Croydon and North Croydon where there is a greater propensity of social housing. Areas to note are Broad Green & Waddon (1.86%), Purley North (1.56%), Selhurst South & West Croydon (1.49%) and Thornton Heath Northwest (1.48%).

This can be seen from the map shown below.





Faith:

Our tenancy profile information will allow the Council to develop plans to reach out to underrepresented faith groups. In doing so, we will form links with Faith Community groups to forge links on our estates. For instance,



	our surveys consistently show a lower response rate from the Muslim Community which form approx. 10% of our community. Sexuality: Our tenant profile information will be used to assess participation of groups in engagement activities. Based on the results from ONS Census 2021, we can estimate that around 3% identify as being part of the LGBT+ community in Croydon.
Fostering good relations	The Council accepts that those involved in resident involvement and attending regular meetings tend to be from a certain age and race profile, and the strategy is committed to ensuring the views of all tenants are sought. Hence, many months have been spent co-designing the strategy with residents. This involved examining our current involvement framework to develop a new framework, which seeks to increase the ability of residents to hold the Council accountable and increase the number of resident groups who can influence our services and decisions.
	Roadshows are used to provide residents with the opportunity to access and engage with services face to face. Involvement opportunities communicated and residents encourage to inform service delivery and the opportunity taken to identify and address barriers to engagement.
	This might mean targeting young people through events or encouraging online involvement from those who are working or seeking to target under involved communities by working with Community groups who have these links.
Embedding anti-racism	Changes proposed by the new strategy will allow engagement to be increased, ensuring that involved residents are representative of our resident profile. Audits of engaged residents will allow Croydon to ensure that antiracism is embedded, and that the Council reaches out to groups to understand and address barriers to engagement.

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

Data collection	The data considered covers the following:



Age: The age profile of Council tenants which is broken down into the following age groups:

20-29: 4%

30-39: 14%

40-49: 19%

50-59: 25%

60-69: 18%

70-79: 11%

80-89: 6%

90-99: 1%

Race: Council tenants can be broken down into the following ethnicity groups:

Asian: 9%

Black: 37%

White: 47% Mixed: 4%

Other: 3%

Disability:

14.1% of Croydon residents identified as having a disability in 2011.

The Council is currently collecting data on the protected characteristics of Council tenants.

Age

Disability

Gender reassignment

Marriage or civil partnership

Pregnancy and maternity

Race

Religion or belief

Sex

Sex orientation

In August 2023, the Council embarked upon three-year programme to proactively collect data via tenancy audits, aimed at visiting 33% of tenants each year. This exercise will be completed in August 2026. Analysis of this data is based on the protected characteristics; allowing the Council to adopt an outreach approach towards specific impairments i.e. visually impaired, deaf etc.



	Improvements in Data collection on protected characteristics of Council tenants will allow decisions to be made which provide positive outcomes for all the groups.
Consultation	The Resident Engagement Strategy has been developed in tandem with residents and is a delivery of commitments made in the Residents Charter; a resident led document agreed by the Executive Mayor which recognises the importance of the resident voice in securing service improvement. This Strategy has been co-designed with residents. Residents involved and uninvolved were asked to take part in designing the Strategy. Residents were able to review our current involvement opportunities and impacts, via design groups, to agree a way forward.

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

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

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

ed teristics ty Act 2010)	Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown) *	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines. **
Age	3	2	6	The strategy will provide the Council with the opportunity to	In August 2023, the Council embarked upon three-year progamme to proactively collect data via tenancy



Protected Characteristics (Equality Act 2010)	Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown) *	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines. **
(Equality Act 2010)				continue to provide a wide range of avenues for all age groups to be involved in making decisions about the services they receive. Ongoing activities have allowed the Council to utilise a range of methods to gather views. For example, roadshows, surveys, and task and finish groups. There has and will continue to be an emphasis on local surgeries and roadshows, these provide residents with the opportunity to access and engage with services face to face. Involvement opportunities	
				communicated and residents encourage to inform service delivery and the opportunity taken to identify and address barriers to engagement. Written and face to face channels will remain available and continue to be promoted locally where possible and ongoing improvements to our	



Protected Characteristics (Equality Act 2010)	Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown) *	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines. **
				website will be used to capture feedback.	
				Our recent consultation with residents has shown low participation amongst the young, a problem experienced across social housing is prevalent in Croydon.	
				To engage the young and seek their views might necessitate alternative methodologies. The Council will work wto develop ways in which we can involve young people.	
				Hence work has started with the Youth Cabinet to understand how they engage, work with and retain the interest of young people. This will allow us to use their best practice and adapt it where required and use it to build upon with the input from our young people to create a framework driven with their input and continue to develop	



Protected Characteristics (Equality Act 2010)	Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown) *	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines. **
				our liaison with sheltered accommodation residents	
Disability	3	2	6	The strategy will seek to ensure that residents with disabilities are afforded access to services and the opportunity to influence service delivery decisions. To date this has led to the introduction of hearing loops in some sites and taxis being provided to allow tenants to attend meetings.	In August 2023, the Council embarked upon three-year progamme to proactively collect data via tenancy audits, aimed at visiting 33% of tenants each year. This exercise will be completed in August 2026 A data cleansing exercise was carried out in March 2024, the results of which have allowed the Council to target visits at groups where data on the protected characteristics needs to be maximised. Ongoing analysis of the data gathered will lead to positive outcomes for residents has the Council will use the analysis to work with residents to improve access to services, accessibility, design and implement opportunities for residents to help sharp service and play a role in the decision-making process. The Council have and will continue to use a variety of avenue to reach out to residents i.e surveys, roadshows, and task and finish groups etc.



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					The Council will adopt an Outreach approach towards specific impairments i.e. visually impaired, deaf etc -
Gender Reassignment	1	1	1	This strategy will mean that we will continue to develop a range of opportunities to ensure resident views are heard and develop an engagement framework that is accessible and attractive to all. There has and will continue to be an emphasis on local surgeries and roadshows, these provide residents with the opportunity to access and engage with services face to face. Involvement opportunities communicated and residents encourage to inform service delivery and the opportunity taken to identify and address barriers to engagement. The data collected to date does not highlight issues in this area.	In August 2023, the Council embarked upon three-year progamme to proactively collect data via tenancy audits, aimed at visiting 33% of tenants each year This exercise will be completed in August 2026 A data cleansing exercise was carried out in March 2024, the results of which have allowed the Council to target visits at groups where data on the protected characteristics is outstanding. Ongoing analysis of the data gathered will lead to positive outcomes for residents has the Council will use the analysis to work with residents to improve access to services, accessibility, design and implement opportunities for residents to help sharp service and play a role in the decision-making process.



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					The Council have and will continue to use a variety of avenue to reach out to residents i.e surveys, roadshows, and task and finish groups etc.
Marriage or Civil Partnership	1	1	1	The range of participation opportunities are available to residents irrespective of marriage and civil partnership status. This strategy will mean that we develop a wide range of opportunities to ensure resident views are heard and develop an engagement framework that is accessible and attractive to all. There has and will continue to be an emphasis on local surgeries and roadshows, these provide residents with the opportunity to access and engage with services face to face. Involvement opportunities communicated and residents encourage to inform service delivery and the opportunity	In August 2023, the Council embarked upon three-year progamme to proactively collect data via tenancy audits, aimed at visiting 33% of tenants each year This exercise will be completed in August 2026 A data cleansing exercise was carried out in March 2024, the results of which have allowed the Council to target visits at groups where data on the protected characteristics is outstanding. Ongoing analysis of the data gathered will lead to positive outcomes for residents has the Council will use the analysis to work with residents to improve access to services, accessibility, design and implement opportunities for residents to help sharp service and play a role in the decision-making process.



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				taken to identify and address barriers to engagement.	
				The data collected to date does not highlight issues in this area.	
Pregnancy and Maternity	1	1	1	This strategy will mean that we will continue to develop a range of opportunities to ensure resident views are heard and develop an engagement framework that is accessible and attractive to all.	In August 2023, the Council embarked upon three-year progamme to proactively collect data via tenancy audits, aimed at visiting 33% of tenants each year This exercise will be completed in August 2026
				There has and will continue to be an emphasis on local surgeries and roadshows, these provide residents with the opportunity to access and	A data cleansing exercise was carried out in March 2024, the results of which have allowed the Council to target visits at groups where data on the protected characteristics is outstanding.
				engage with services face to face. Involvement opportunities communicated and residents encourage to inform service delivery and the opportunity taken to identify and address	Ongoing analysis of the data gathered will lead to positive outcomes for residents has the Council will use the analysis to work with residents to improve access to services, accessibility, design and implement
				The data collected to date does not highlight issues in this area.	opportunities for residents to help sharp service and play a role in the decision-making process. The Council have and will continue to use a variety of avenue to reach out to



Protected Characte (Equality		Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown) *	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines. **
						residents i.e surveys, roadshows, and task and finish groups etc.
	Race	3	2	6	The Council is committed to working towards becoming an anti-racist organisation. To achieve this, we need to demonstrate that the actions we are taking are making a positive difference to the lived experience of our staff and communities. We are seeking to targeting greater and proportionate representation within the Black community in recognising the projected increase in this group. The use of translators from external services and staff who speak a variety of languages has helped to increase participation. There has and will continue to be an emphasis on local surgeries and roadshows, these provide residents with the opportunity to access and	In August 2023, the Council embarked upon three-year progamme to proactively collect data via tenancy audits, aimed at visiting 33% of tenants each year This exercise will be completed in August 2026 A data cleansing exercise was carried out in March 2024, the results of which have allowed the Council to target visits at groups where data on the protected characteristics is required. Ongoing reviews of the data gathered will lead to positive outcomes for residents. The Council have and will continue to use a variety of avenue to reach out to residents i.e surveys, roadshows, and task and finish groups etc.



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				engage with services face to face. Involvement opportunities communicated and residents encourage to inform service delivery and the opportunity taken to identify and address barriers to engagement.	
Religion or Belief	1	1	1	This strategy will mean that we will continue to develop a range of opportunities to ensure resident views are heard and develop an engagement framework that is accessible and attractive to all. There has and will continue to be an emphasis on local surgeries and roadshows, these provide residents with the opportunity to access and engage with services face to face. Involvement opportunities communicated and residents encourage to inform service delivery and the opportunity taken to identify and address barriers to engagement.	In August 2023, the Council embarked upon three-year progamme to proactively collect data via tenancy audits, aimed at visiting 33% of tenants each year This exercise will be completed in August 2026. A data cleansing exercise was carried out in March 2024, the results of which have allowed the Council to target visits at groups where data on the protected characteristics is required. Ongoing analysis of the data gathered will lead to positive outcomes for residents. The Council will use the analysis to work with residents to improve access to services, accessibility, design and implement opportunities for residents to help sharp service and play a role in the decision-making process.



Protected Characteris (Equality A		Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown) *	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines. **
					The data collected to date does not highlight issues in this area.	The Council have and will continue to use a variety of avenue to reach out to residents i.e surveys, roadshows, and task and finish groups etc.
Se	X	1	1	1	The strategy seeks to continue to provide a range of avenues for residents irrespective of gender to influence service provision. Day time and evening events are used to ensure residents can find the best time for them to meet. Digital inclusion will be promoted regardless of gender, digital newsletters are sent out to 1900 residents. There has and will continue to be an emphasis on local surgeries and roadshows, these provide residents with the opportunity to access and engage with services face to face. Involvement opportunities communicated and residents encourage to inform service	In August 2023, the Council embarked upon three-year progamme to proactively collect data via tenancy audits, aimed at visiting 33% of tenants each year This exercise will be completed in August 2026 A data cleansing exercise was carried out in March 2024, the results of which have allowed the Council to target visits at groups where data on the protected characteristics is required. Ongoing analysis of the data gathered will lead to positive outcomes for residents. The Council will use the analysis to work with residents to improve access to services, accessibility, design and implement opportunities for residents to help sharp service and play a role in the decision-making process.
					delivery and the opportunity	The Council have and will continue to use a variety of avenue to reach out to



Protected Characteristi (Equality Act		Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown) *	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines. **
					taken to identify and address barriers to engagement. The data collected to date does not highlight issues in this area.	residents i.e surveys, roadshows, and task and finish groups etc.
Sexi	ual Intation	1	1	1	The strategy seeks to continue to provide a range of avenues for residents irrespective of sexual orientation to influence service provision. Day time and evening events are used to ensure residents can find the best time for them to meet. Digital inclusion will be promoted regardless of gender, digital newsletters are sent to 1900 residents. There has and will continue to be an emphasis on local surgeries and roadshows. These provide residents with the opportunity to access and engage with services face to face. Involvement opportunities communicated and residents encourage to inform service delivery and the opportunity	In August 2023, the Council embarked upon three-year progamme to proactively collect data via tenancy audits, aimed at visiting 33% of tenants each year This exercise will be completed in August 2026 A data cleansing exercise was carried out in March 2024, the results of which have allowed the Council to target visits at groups where data on the protected characteristics is required. Ongoing analysis of the data gathered will lead to positive outcomes for residents. The Council will use the analysis to work with residents to improve access to services, accessibility, design and implement opportunities for residents to help sharp service and play a role in the decision-making process. The Council have and will continue to use a variety of avenue to reach out to



Protected Characteristics (Equality Act 2010)	Likelihood of impact	Severity of impact	Impact score	Summary of impact (positive, negative, no impact or unknown) *	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines. **
				taken to identify and address barriers to engagement.	residents i.e surveys, roadshows, and task and finish groups etc.

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

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



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

Decision	Definition	Conclusion - Mark 'X' below
No major	Our analysis demonstrates that the proposed change is robust. The evidence	
change	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.	
Adjust the	We will take steps to lessen the impact of the proposed change should it	X
proposed	adversely impact the Council's ability to meet any of the Public Sector Duties,	
change	remove barriers or better promote equality. We are going to take action to ensure	
	these opportunities are realised. If you reach this conclusion, ensure you	
	have completed Section 5 above.	
Continue the	We will adopt or continue with the change, despite potential for adverse impact or	
proposed	opportunities to lessen the impact of discrimination, harassment or victimisation	
change despite	and better advance equality and foster good relations between groups through	
potential for	the change. However, there are justifiable reasons to continue as planned. If you	
adverse impact	reach this conclusion, ensure you have completed Section 4 above, clearly	
	setting out your justifications.	
Stop or amend	Our change would have adverse effects on one or more protected groups that	
the proposed	are not justified and cannot be mitigated. Our proposed change must be stopped	
change	or amended.	

Stage 7: EQIA Monitoring and Sign Off

How will the EQIA be reviewed and monitored, including timescales?	[EQIAs must be reviewed every 2 years or sooner if new data or impact is identified.]				
Equalities advice received from:	Ken Orlukwu Senior Equalities Officer	Date:	05/07/2024		
EQIA approved by:	[Name and job title Director or Corporate Director responsible]	Date:			