

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	Spatial Planning, Place
Title of proposed change	Local Plan Review: Proposed policies
Name of Officer carrying out Equality Analysis	Maggie Williams

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.

Croydon needs to review its existing Local Plan to rise to the challenges facing the borough and its communities over the next 20 years and beyond. Planning is critical to ensuring that Croydon meets the needs of all its residents, workers and visitors. This Local Plan review will set out how Croydon will contribute to meeting its own housing needs, including the need for affordable homes; whilst tackling the causes of climate change in the borough, and ensuring it is developing vibrant places for people to live, work and visit. The review will set out the spatial strategies, sites and planning policies necessary to meet these needs, over the period from 2019 to 2039. The Local Plan review is a partial review and does not cover all areas of the Plan. Only those areas of the plan where existing policies are being changed or new policies introduced are considered within this equality assessment as an equality assessment of the 2018 Croydon Local Plan has previously been undertaken.

The Equality Analysis was updated in November 2021 and reviewed in October 2023 to take account of the publication of the Equality Strategy 2023-2027

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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<p>Age</p>	<p>Proposed housing policy supports additional growth in housing and greater choice. Policies to enable more genuinely affordable housing will benefit older people, families with children and young households on low incomes. The need for specialist and supported accommodation for older people and care leavers is recognised in policy, with restrictions on further growth of care homes to enable other alternatives to come forward, providing greater choice. Policy on neighbourhood centres ensures that less mobile groups such as the elderly have reliable access to the goods and services they need. Policies seeking to limit the over concentration of Hot food Takeaways address the issue of obesity which disproportionately affects young and low income individuals. Policies on creating sustainable community activities, improving parks and open spaces to accommodate community events and activities and promoting high quality, accessible community facilities and co-located services that are inclusive will benefit older people, young people and families with children. Policy proposals to develop new, accessible burial grounds and to improve bus services will positively impact on older people.</p> <p>The housing proposals will contribute to outcomes 2 and 3 of the Equality Strategy by addressing individual needs as they arise, providing greater choice and more affordable options and supporting good health outcomes for older people, enabling them greater opportunities to remain living in their homes and/or moving into suitable alternative accommodation (sheltered accommodation, care homes) if needed.</p> <p>Policies to ensure the sustainability of local centres will contribute to outcome 2, enabling</p>	<p>No significant negative impact has been identified.</p>	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document. This document is the Croydon Borough Profile June 2023. Other evidence is listed as follows:</p> <p>Croydon affordable housing viability assessment</p> <p>This study looks at the financial viability of affordable housing provision in private residential development in Croydon. It also tests the robustness of the study by setting out different scenarios of housing market price, code of sustainable homes, S106 requirements etc. The study recommends a dynamic viability target matrix for affordable housing which can be adjusted according to the changes in housing price, building cost and alternative use value indices.</p>
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older people and younger people, who are less likely to benefit from car ownership, to access goods and services locally. The restriction in the development of food takeaways will contribute to outcome3 by improving health outcomes for young people Policies supporting the development of community facilities and activities provide opportunities to involve older people and young people, and help to reduce social isolation, contributing to outcome 3.

Gypsy and traveller accommodation needs assessment
This report details the findings from the Gypsy and Traveller accommodation needs assessment (GTANA) for Croydon.

Croydon's strategic housing market assessment
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Borough-wide retail needs study
This report evaluates the trends, issues and hierarchy of Croydon town centres, local and district centres, shopping parades and Purley Retail Park. It also looks at the market share and expenditure of the borough as a whole and for individual centres.

Neighbourhood centres
Neighbourhood centres are a new designation that

			<p>typically serve a localised catchment often most accessible by walking and cycling and include local parades, community uses and small clusters of shops, mostly for convenience goods and other services</p> <p>Infrastructure delivery plan The infrastructure delivery plan (IDP) identifies the borough's infrastructure requirements including social, physical and green infrastructure.</p> <p>The IDP sets out what is needed, where it is needed and when it is needed. It then provides an update on the delivery of the required infrastructure to date. Each infrastructure type is accompanied by an infrastructure delivery schedule table which provides further detail on delivery, funding sources, costs and identifies whether there are any funding gaps.</p>
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<p>Disability</p>	<p>Policies to increase the provision of low cost rented housing and to ensure it is genuinely affordable will benefit disabled households who are more likely to be on low incomes and dependent on affordable. The policy also supports the provision of accessible housing (M4(2)) and homes for wheelchair users (M4(3)). Policies seeking an increased in supported bedspaces for people with disabilities will benefit people with mental health issues, physical disability and learning disability. Policies promoting education and training and employment opportunities will benefit people with disabilities who experience barriers in these areas. Policies on neighbourhood centres will ensure local access to goods and services for those less mobile. Policies to protect and expand industrial and employment land in the borough will benefit those disproportionately impacted by other issues such as low income, including disabled people. Policies promoting sustainable community activities such as urban farming and community kitchens and improvements to parks and open spaces to accommodate accessible community events and activities and co-located services that are inclusive will increase the participation of disabled people.</p> <p>The housing proposals will contribute to outcomes 2 and 3 of the Equality Strategy by seeking to increase the provision of accessible housing for people with disabilities and of specialist supported housing for vulnerable and disabled people, which will help meet arising needs and support improved health outcomes.</p> <p>Employment policies seeking to increase access to education and training opportunities in the borough for people with disabilities will help to deliver outcome 2 by</p>	<p>No significant negative impact has been identified.</p>	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document. This document is the Croydon Borough Profile June 2023.</p> <p>Croydon affordable housing viability assessment</p> <p>This study looks at the financial viability of affordable housing provision in private residential development in Croydon. It also tests the robustness of the study by setting out different scenarios of housing market price, code of sustainable homes, S106 requirements etc. The study recommends a dynamic viability target matrix for affordable housing which can be adjusted according to the changes in housing price, building cost and alternative use value indices.</p>
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Gender	Policy supports the provision of genuinely affordable low cost rented housing, which will help meet the housing needs of low-income households and positively impact on female headed low parent households who are more likely to experience low income, poverty and	No significant negative impact has been identified.	Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy

	<p>homelessness and are disproportionately represented among those in housing need. Lone parents experience a higher rate of unemployment than the rest of the population and a disproportionate number of lone parents are female, so policies to increase education and training opportunities in the borough, connected to jobs, will help increase opportunities for this group. Policies promoting sustainable community activities such as urban farming and community kitchens, high quality, accessible community facilities and colocated services will benefit females who are more reliant on these forms of community provision. Policies to improve bus services should be positive for lone parents and women looking after young children who are less likely to have access to a car and rely on public transport.</p> <p>Housing proposals seeking to increase the provision of affordable housing contribute to outcomes 2 and 3 of the Equality Strategy by improving access to housing for female headed lone parent households who are more likely to experience low incomes, homelessness and housing need.</p> <p>Policies protecting and promoting community facilities are likely to impact positively on women child carers and contribute towards outcome 3, by addressing social isolation.</p>		<p>documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document. This document is the Croydon Borough Profile June 2023. Other evidence is listed as follows:</p> <p>Croydon affordable housing viability assessment</p> <p>This study looks at the financial viability of affordable housing provision in private residential development in Croydon. It also tests the robustness of the study by setting out different scenarios of housing market price, code of sustainable homes, S106 requirements etc. The study recommends a dynamic viability target matrix for affordable housing which can be adjusted according to the changes in housing price, building cost and alternative use value indices.</p> <p>Gypsy and traveller accommodation needs assessment</p> <p>This report details the findings from the Gypsy and Traveller accommodation</p>
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Gender Reassignment	Policies promoting education and training uses in the borough and connecting these opportunities to employment will benefit Individuals with gender reassignment who are known to experience discrimination and barriers to education and employment, and should increase opportunities to gain education and training locally in the borough.	No significant negative impact has been identified.	Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues

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<p>Marriage or Civil Partnership</p>	<p>No specific positive impacts have been identified.</p>	<p>No significant negative impact has been identified.</p>	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document. This document is the Croydon Borough Profile June 2023. Other evidence is listed as follows:</p>

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<p>Religion or belief</p>	<p>Policies supporting the provision of genuinely affordable housing to meet the housing needs of low-income households and to deliver mixed and balanced communities, including religious diversity, will positively impact on households from some religious groups who tend to have larger household sizes and are more likely to be overcrowded and experience housing need. Policies proposed to guide the search for new a burial site that is accessible for all the residents in the borough will positively affect those communities for whom burial is the only option. Overcoming imbalances in provision can positively impact on community integration.</p> <p>Housing proposals and proposals for a new burial site will both contribute to outcomes 2 and 3, supporting religious diversity and inclusiveness.</p>	<p>No significant negative impact has been identified.</p>	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document. This document is the Croydon Borough Profile June 2023. Other evidence is listed as follows:</p> <p>Croydon affordable housing viability assessment</p> <p>This study looks at the financial viability of affordable housing provision in private residential</p>

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Croydon Burial Land Need and Provision Study

The Croydon Burial Land Need and Provision Study has been prepared by Nathaniel Lichfield and Partners for the London Borough of Croydon to inform the Council's Local Plan. The purpose of the study is to provide the requisite evidence base to underpin future planning policy and site allocations within the Local Plan as they relate to burial land need and provision. The study: 1 Establishes and reviews burial trends and the policy framework; 2 Assesses burial need, including specific religious requirements, to 2031; 3 Identifies options to meet this need; and 4 Provides initial and detailed consideration of the options. The policy review and consideration of existing burial provision in LB Croydon provide the context to the study. Past burial trends and future predictions

			<p>on population and burial rates indicate that there is a quantitative burial need in the Borough to provide for around 10,000 full body burials and burial cremated remains, or 450 per year, for the next twenty years.</p>
Race	<p>Policies supporting the provision of genuinely affordable housing to meet the housing needs of low income households will positively impact on BAME households who are more likely to experience poverty, overcrowding and homelessness and are disproportionately represented among those in housing need. Employment policies aim to address inequalities in the Croydon economy through improved opportunities for connecting education and training to jobs and promoting opportunities for cultural and creative economies, which are likely to impact positively on BAME communities.</p> <p>Housing proposals seeking to increase the provision of affordable housing will support the achievement of outcomes 2 and 3 of the Equality Strategy by improving access to housing for BAME households who are more likely to experience low incomes, homelessness and housing need. Policies seeking to increase provision for gypsies and travellers will also contribute to outcome 1 by promoting greater inclusiveness.</p> <p>Employment policies aims to introduce more opportunities to connect people from BAME groups, to education, training and employment opportunities and support outcome 2. BAME groups experience disproportionate barriers to employment and</p>	<p>No significant negative impact has been identified.</p>	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document. This document is the Croydon Borough Profile June 2023. Other evidence is listed as follows:</p> <p>Croydon affordable housing viability assessment</p> <p>This study looks at the financial viability of affordable housing provision in private residential development in Croydon. It also tests the robustness of the study by setting out different scenarios of housing market price, code of sustainable homes, S106 requirements etc. The study</p>

	<p>have greater number of people with low or no qualifications.</p>		<p>recommends a dynamic viability target matrix for affordable housing which can be adjusted according to the changes in housing price, building cost and alternative use value indices.</p> <p>Gypsy and traveller accommodation needs assessment This report details the findings from the Gypsy and Traveller accommodation needs assessment (GTANA) for Croydon.</p> <p>Croydon's strategic housing market assessment This report (and its update) projects the need and demand for housing in Croydon. It estimates the likely overall proportions of households that require market or affordable housing, and the size and type of housing required.</p> <p>Borough-wide retail needs study This report evaluates the trends, issues and hierarchy of Croydon town centres, local and district centres, shopping parades and Purley Retail Park. It also looks at the market share</p>
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Sexual Orientation	No specific positive impacts have been identified.	No significant negative impact has been identified.	<p>Evidence to test the impact of policies has been collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document. This document is the Croydon Borough Profile June 2023.</p> <p>Croydon affordable housing viability assessment This study looks at the financial viability of affordable housing provision in private residential development in Croydon. It also tests the robustness of the study by setting out different scenarios of housing market price, code of sustainable homes, S106 requirements etc. The study recommends a dynamic viability target matrix for affordable housing which can be adjusted according to the changes in housing</p>

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Pregnancy or Maternity	Policies supporting the provision of genuinely affordable housing to meet the housing	No significant negative impact has been identified.	Evidence to test the impact of policies has been

	<p>needs of low income households will positively impact on pregnant women in housing need who have a recognised priority need for low cost rented housing.</p> <p>Policies seeking to increase the provision of affordable housing will support the achievement of outcomes 2 and 3 of the Equality Strategy by improving access to housing for pregnant women who are homeless or in housing need.</p>		<p>collected from a range of sources: Croydon Observatory; 2011 Census; Croydon strategic policy documents; ONS, Housing Need data; Health data, Adult and Children services data. This has been collated into a borough profile and key facts and issues document. This document is the Croydon Borough Profile June 2023. Other evidence is listed as follows:</p> <p>Croydon affordable housing viability assessment</p> <p>This study looks at the financial viability of affordable housing provision in private residential development in Croydon. It also tests the robustness of the study by setting out different scenarios of housing market price, code of sustainable homes, S106 requirements etc. The study recommends a dynamic viability target matrix for affordable housing which can be adjusted according to the changes in housing price, building cost and alternative use value indices.</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

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
None identified		

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

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	1	1	1
Disability	1	1	1
Gender	1	1	1
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	1	1	1
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	1	1	1

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4. Statutory duties

4.1 Public Sector Duties

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

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

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

The proposed policies will assist in advancing equality of opportunity and good relations between people who belong to protected groups and in other areas will have no specific impact on people who belong to protected groups.

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:

The proposed policies are generally assessed to have positive or neutral impacts on people from protected groups and any potential negative impacts have been assessed to have a low equality impact score. No specific actions have been identified as necessary.

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

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Disability				
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				
Age				
Religion or belief				
Pregnancy or maternity				
Marriage/civil partnership				

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>We have undertaken detailed analysis of the proposed Local Plan Review policies in relation to all groups with protected characteristics and identified the impacts to be positive or neutral.</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</p>	

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	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: December 2023	

7. Sign-Off

Officers that must approve this decision	
Equalities Lead	Name: Naseer Ahmad Date: 20/10/2023 Position: Interim Senior Equalities Officer
Director	Name: Heather Cheesbrough Date: 20/10/2023 Position: Director of Planning & Sustainable Regeneration