

Housing Delivery Plan - 16 September 2013 - Equality Analysis

An Equality Analysis enables us to target our services, and our budgets, more effectively and understand how they affect all our communities. It also helps us comply with the Equalities Act 2010.

For more information about when you should carry out equality analysis, who should do this and the support available, go to the equality analysis intranet page.

This form has four sections

- 1: decide whether a full equality analysis is needed. If not, you do not complete sections 2-4.
- 2: gathering evidence
- 3: determining actions
- 4: decision and next steps

Appendix One - Decision-making process

Appendix Two - Data broken down by Protected Characteristics

Name of document		5 Year Housing Delivery Plan	
Version	Date reviewed	Date of next review	Reviewed by
V1		30/09/14	
			Changes made

1. Decide whether a full equality analysis is needed

1.1 What are you analysing?

Question	Guidance	Answer
<p>What is the name of your change or review?</p>	<p>The change or review may involve:</p> <ul style="list-style-type: none"> o policies, strategies and frameworks o budgets o plans, projects and programmes o staff structures (including outsourcing) o the use of buildings o commissioning (including re-commissioning and de-commissioning) o services (for example, how and where they are delivered) o processes (for example thresholds, eligibility, entitlements, and access criteria) 	<p>5-year Housing Delivery Plan</p>
<p>Why are you doing this?</p>	<p>For example, we are considering cutting a service.</p>	<p>A launch of the 5-year Housing Delivery Plan to deliver quality homes and sustainable places that contribute positively to the overall quality of life across the borough.</p> <p>The Plan acts as a prospectus for the borough and sets out our plan for the delivery of the new homes required to</p>

	<p>support economic growth as well as meet our developing needs as conveyed in the Local Plan.</p> <p>This Plan sits under the over-arching 2011-15 Housing Strategy, which has its own full Equality Analysis.</p> <p>The launch of the Plan takes a medium strategic perspective and has been developed in order to map out and support the delivery of Croydon's long-term vision for the borough</p> <p>This Plan focuses on what the Council will do to deliver new homes over the next 5 years in a difficult economic climate, with a particular focus on meeting a planned target of between 1,500 and 2,000 new homes per annum over the first two years of the programme, rising to a target of close to 2,000 homes by year five</p> <p>The Plan is being implemented following the merger/restructure of the Housing Development & Regeneration Team in order to increase the teams specialist expertise, become better empowered and more geared – to enable housing development & regeneration in the changed environment.</p>
<p>What is likely to be different when you have finished?</p>	

	<p>The 5-year Housing Delivery Plan provides a framework of key policy and strategic goals which informs the work of all partner organisations/stakeholders with a role to play in regeneration within the borough.</p> <p>There will be an increased number of housing starts: 7,000 possible over the next five years, although there is potential to increase this figure to 9,500.</p> <p>The team will have also gained a better understanding of the tools such as the various delivery models available to facilitate this delivery.</p>
<p>What will be the main outcomes or benefits from making this change?</p>	<p>The Council will work with a range of partners to ensure all measures are brought forward to maximise the boroughs housing pipeline.</p> <p>The Council will work with its partners to build on its significant delivery track-record, and develop a more enhanced role to proactively seek out developers and other partners to make their sites work for them and for the benefit of local communities.</p> <p>The Council will engage with delivery partners at an early stage to secure funding, provide investment, and set partnership approaches that can drive</p>

forward Croydon's housing programme. Where schemes have been identified as stalled, or on-hold, the Council and partners will use all of their powers to unblock these, enabling schemes to be brought forward in a timelier manner than that dictated by current market conditions.

The Local Plan indicates that the borough has the potential to deliver over 20,000 new homes between 2011 - 2031); with much of the activity supporting growth in the Croydon Opportunity Area.

This Housing Delivery Plan focuses on what the Council will do to deliver new homes in a sustainable manner over the next 5 years, with a particular focus on meeting a planned target of between 1,500 and 2,000 new homes starting on site per annum over the first two years of the programme, rising to a target close to 2,000 homes by year five, to contribute much needed housing to the London and UK economy.

What stage is your change at now?

See appendix one for the main stages at which equality analyses need to be started or updated. In many instances, an equality assessment will be started when a report is being written for a committee. If that report recommends that a project or programme takes place, the same equality assessment can be updated to track equality impacts as it progresses. If the project or programme includes commissioning or de-commissioning, the same equality assessment can be updated again.

A report which is to be presented to Cabinet on 30/09/13.

To date:

- the new HDR Team is now in place and fully operational;
- HDR Team are mapping out delivery plans for housing sites to form the 5-year delivery programme;
- HDR is setting up a robust governance structure to support the delivery of this strategy. This will consist of Programme Boards, approval processes etc.;
- An Equality Analysis for this Housing Delivery Plan has been completed;
- delivery has been on-going and continued throughout this period.

An equality analysis must be completed before any decisions are made.

If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected and how?

Question	Guidance	Answer
Who are your internal stakeholders?	For example, groups of council staff, members	<ul style="list-style-type: none"> • Directors, Heads of Service and senior managers in Planning and Environment, including spatial planning and planning control, Economic Development, Capital Delivery Hub, Highways, Transport, Sports and Physical Activity and Parks and Open Spaces • The Executive Office including Corporate Legal Team and internal and external communications teams • Corporate Resources and Customer Services including Finance officers in Revenue and Capital finance and Corporate Property and Accommodation and Procurement teams • Managers and Directors in the Children, Families and Learning including education and libraries • Adult Services, Health and Housing including Strategy, Allocations, Needs and Options, Housing Management, Programme Management and

		<p>Responsive Repairs</p> <ul style="list-style-type: none"> • Councillors including the Leader, Cabinet Members and ward Members • Chief and Senior Officers including Directors, Executive Directors and the Chief Executive
<p>Who are your external stakeholders?</p>	<p>For example, groups of service users, service providers, trade unions, community groups and the wider community?</p>	<ul style="list-style-type: none"> • Private Developers & their agents/consultants • Landowners • Registered Providers (RPs) • CCURV, including the CCURV General Manager and senior representatives from John Laing • Relevant government departments, agencies and NGOs, including but not limited to: DfE, DEFRA, Design for London, Environment Agency, GLA, Partnerships for Schools, Education Funding Agency, Transport for London, Heritage Lottery Fund, English Heritage, Arts Council, Sport England, NHS Croydon • Network Rail • Enabling Managers in other local authorities • Strategic Regional Housing Partnerships • Consultants • Chambers of Commerce • Develop Croydon stakeholders

		<ul style="list-style-type: none"> • Stakeholders Forums • Funders, Investment Banks • Third party and charitable organisations • Residents Associations, community forums and other local community led groups
<p>Does your proposed change relate to a service area where there are known or potential equalities issues?</p>	<p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. If you don't know, you may be able to find out on the Croydon Observatory (http://www.croydonobservatory.org/)</p>	<p>Yes - The 5-year Housing Delivery Plan sets out the policy context and priorities for the Council. They relate to the delivery of quality homes and sustainable places that contribute positively to the overall quality of life across the borough. The Plan acts as both a prospectus for the borough and sets out our plans for the delivery of the new homes required to support economic growth as well as meet our developing needs as conveyed in the Local Plan.</p> <p>Potential Equalities Issues:</p> <p>i) Population growth means that an additional 27,000 new homes would be needed in Croydon by 2031 to meet the need for new homes.</p> <p>ii) There is limited developable land available for residential development within the built up area meaning that it is only possible to plan for 20,200 new homes over the 20 year period.</p>

<p>iii) The need to achieve a level of affordable housing that addresses the level of need, whilst still ensuring that developments are viable and much needed market homes continue to be built in Croydon.</p> <p>iv) The need to meet housing targets at the same time should allow for land to be provided for employment, education, health, retail and other community facilities to ensure a good quality of life for the residents of new housing in the long term.</p> <p>v) Social housing households contain higher than average proportions of people who experience discrimination and other social disadvantage.</p>		<p>Yes - it incorporates key local and national indicators:</p> <ul style="list-style-type: none"> • number of Affordable homes delivered (gross); • supply of ready to develop housing sites; • value for money; • reduction in homelessness and the need for families to live in temporary accommodation, especially those with a Black and Minority Ethnic background; • households in temporary
	<p>You can find out from the Equality Strategy (http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>	
<p>Does your proposed change relate to a service area where there are already local or national equality indicators?</p>		

<p>Would your proposed change affect any protected groups more significantly than non-protected groups?</p>		<p>accommodation;</p> <ul style="list-style-type: none"> households accepted as homeless; number of overcrowded households.
	<p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix Two.</p>	<p>Yes - The Plan has different impacts on different ethnic groups. This is related to Croydon's demographic profile. For example services for older people tend to benefit a higher proportion of white British people whereas services for younger people tend to benefit a higher proportion of BME people.</p> <p>In relation to disabled service users, development plans requires 10% of new housing to be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users.</p> <p>With regard to the Race/ethnicity & Religious/Faith protected groups - the Plan will apply to anyone wanting to live in Croydon, regardless of tenure. The Plan is also likely to indirectly afford protection to households with larger families on low incomes.</p> <p>Planning policy, which is supported by this Housing Delivery Plan, seeks to deliver ten additional Gypsy and Travellers pitches in the borough by 2021 to meet the need of Croydon's Gypsy and</p>

Traveller community.

Asylum Seekers & Refugees and LGBT people may gain indirectly from measures intended for the general population, because they are not targeted explicitly in the Plan, they do not stand to benefit directly from it as the Plan will apply to everyone wanting to live in Croydon.

The Plan does address age (young people) -specific housing needs to an extent, as there is a focus on student housing & age (older people)- and potentially via the Mayors Covenant Care & Supported Housing Fund Phase 2 (Innovative Supported Housing & Specialised housing). The same also applies to disabled people.

Additionally, the Local Plan demonstrates a commitment to working with partners to facilitate the provision of specialist and supported housing for elderly and vulnerable people.

The Plan also potentially addresses the needs of those belonging to the following groups: Marriage/Civil Partnerships & Pregnancy/Maternity through the focus on provision of more family homes. Specifically via the setting of a strategic target for 60% of all new homes outside the Croydon Opportunity Area up to 2031

		<p>to have three or more bedrooms; and aspiring to 20% of all new homes within the Croydon Opportunity Area having three or more bedrooms by 2031, and aspiring to 35% of all two bedroom homes providing four bed spaces.</p>
<p>Would your proposed change help or hinder the council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the protected groups?</p>	<p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>	<p>Yes – The 5 year Housing Strategy & Delivery Programme should make a positive contribution toward equalities in Croydon.</p> <p>The main priorities as set out are key tools in not only identifying but also dealing with equalities issues.</p> <p>By empowering stakeholders through the signposting/provision of the various tools and powers to deliver the goals as set out within the strategy, these stakeholders are able to influence/shape the borough.</p> <p>Through partnership working especially organisations/groups that work with Protected Groups, we will be better placed to identify service gaps and needs accurately.</p> <p>Appropriate actions can then be developed to ensure steps are taken to meet the identified needs.</p>
<p>Would your proposed change help or hinder the council in advancing equality of opportunity between people who</p>	<p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>	<p>Yes – The 5 year Housing Delivery Plan should make a positive contribution toward equalities in Croydon.</p>

<p>belong to any protected groups and those who do not?</p>		<p>The Plan is centred around and incorporates key priorities which relate to equality of opportunity. These will be monitored as part of the performance monitoring system that is in place.</p> <p>For example, by 2031 over half of Croydon's population will be a member of a black and minority ethnic community compared to 36% in 2001. BME communities suffer disproportionately from poor housing conditions and are also over-represented in (Local Authority) social housing.</p>
<p>Would your proposed change help or hinder the council in fostering good relations between people who belong to any protected groups and those who do not?</p>	<p>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response</p>	<p>Yes – The Plan will potentially empower all groups and communities to foster good relationships through its support of partnership working and information sharing.</p> <p>This approach is likely to increase interactions and understanding across groups.</p> <p>The Plan will also enable the different groups to influence and make decisions that shape the borough.</p>

1.3 Decision		
If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different/significant impact on protected groups (compared to non-protected groups) or because you don't know whether it will (and it might).		
Decision	Guidance	Response
No, further equality analysis is not required	Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available', could leave the council vulnerable to legal challenge. You must include this statement in any report used in decision making, such as a Cabinet report	
Yes, further equality analysis is required	Please state why and outline the information that you used to make this decision. Also indicate <ul style="list-style-type: none"> - when you expect to start your full equality analysis - the deadline by which it needs to be completed (for example, the date of submission to Cabinet). - where and when you expect to publish this analysis (for example, on the council website). You must include this statement in any report used in decision making, such as a Cabinet report.	Yes - Full equality analysis initiated August 2013. Completed 29 th August 2013 for Informal Cabinet. The reason being that the 5 Year Housing Delivery Plan could have a different/significant impact on some protected groups (compared to non-protected groups).

Officers that must approve this decision	Name and position	Date
Report author	Beverley Nomafo – Head of Housing Development & Regeneration	29 August 2013
Director	Tony Antoniou - Director Of Regeneration And Economy	
Please email this completed form to data.equalities@croymdon.gov.uk , together with an email trail showing that the your director has approved it.		
1.4 Feedback from the corporate equalities team		
Name of equalities officer	Becky Saunders	
Date received by equalities officer	13/08/13	
Should a full equality analysis be carried out?	Yes	
Please send this document to - the person responsible for making the decision - democratic services, the corporate programme office or procurement as appropriate in time for the relevant decision making meeting		

2. Evidence Considered

List the documents and information that have been considered as part of this review to enable reasonable judgments to be made on the assessment of impact.

Quantitative Data	Qualitative Data
Documents and Information considered as part of this review included:	
<ul style="list-style-type: none"> • LBC Housing Market Assessment • LBC Affordable Housing Viability Study - Fordham Research 2010 • LBC Core Strategy Evidence Base - Housing Technical Paper March 2012 • Savill's Market Analysis 2012 • LBC Homelessness Cabinet Report - January 2013 • LBC Housing Market Study - GVA June 2013 • Housing Strategy 2011-15 - Equality Impact Assessment including the 2011-15 Housing Strategy Conference Report and 	

consultation outcomes..

- Bridging the Gap - Backing the Construction Sector to Generate Jobs : CBI 2012

2.1 Analysing Impact

Use the table below plot and identify where there is a potential impact on any of the staff and customers/service users by protected characteristic arising from the change.

The cells of the matrix should be filled in as below:

Key

O Indicates a Neutral Impact on Service Users/Staff, This is due to evidence is not being available to indicate otherwise

P Indicates the change may have a potential Positive Impact on Service Users/Staff

N Indicates the change may have a potential Negative Impact on Service Users/Staff

P/N Indicates the change may have both Positive and Negative Impacts on Service Users/Staff

An example of the chart filled in below:

Services		Protected Characteristics								
		Age	Disability	Gender Reassignment	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation	Marriage and Civil Partnership
	Capacity	0	0	0	0	0	0	0	0	0
	Availability	0	0	0	0	0	0	0	0	0
	Continuity	0	0	0	0	0	0	0	0	0
Service Provision	Security	0	0	0	0	0	0	0	0	0
	Supplier Management	0	0	0	0	0	0	0	0	0
	Service Level Availability	P	P	0	0	0	0	0	0	0
	Service Catalogue Management	N	P/N	0	0	0	0	0	0	0

		Protected Characteristics									
		Age	Disability	Gender Reassignment	Pregnancy and Maternity	Race	Religion and Belief	Sex	Sexual Orientation	Marriage and Civil Partnership	
Objective One: MEETING RISING HOUSING DEMAND	Increase the supply of new housing in Croydon	P	P	P	P	P	P	P	P	P	
	Preserving character and distinctiveness	P/N	P/N	P/N	P/N	P/N	P/N	P/N	P/N	P/N	
	Protecting green belt and open space	P/N	P/N	P/N	P/N	P/N	P/N	P/N	P/N	P/N	
Objective Two: INVESTING IN THE NECESSARY INFRASTRUCTURE	Ensure there is sufficient land for other purposes including employment, commercial activity, education and community facilities.										
		P	P	P	P	P	P	P	P	P	
Objective Three: EMBRACING NEW DELIVERY MODELS	Protect and improve existing housing in Croydon	P	P	P	P	P	P	P	P	P	
	Deliver the commitments relating to the Investment in the Council's schools programme as per the Councils Investment Strategy.										
	Deliver the Connected Croydon Programme and subsequently improve the boroughs' Public Realm.	P	P	O	O	P	O	P/N	O	O	
		P	P	P	P	P	P	P	P	P	

Ensure we meet housing need	P	P	P	P	P	P	P	P	P	P
Increase the provision of Student Accommodation	P	O	O	O	O	O	O	O	O	O
Ensure delivery via the Private Rented Sector	P/N	P/N	P/N	P/N	P/N	P/N	P/N	P/N	P/N	P/N
Utilise the potential of the office to Residential Conversions opportunities that exist within the Borough	P	P/N	P/N	P/N	P/N	P/N	P/N	P/N	P/N	P/N

The implementation and delivery of this housing plan potentially affects all of the protected groups as defined by The **Equality Act 2010**, which legally protects people from discrimination in the workplace and in wider society.

The Council must show how it has, taken steps to meet the needs of disadvantaged people and how it has encouraged participation in any activity where participation is disproportionately low. In particular the Council must take steps to meet the needs of disabled people, tackle prejudice and promote understanding.

For example, the Council are not only keen to deliver more housing but also improve the quality of homes through the adherence to the London Housing Design Guide for all schemes applying for funding from the Greater London Authority.

The guide has been compiled after extensive consultation on a draft guide launched by the Mayor in July 2009. It clarifies, consolidates and sets new minimum space standards in a number of key policy areas. It promotes better neighbourhoods, high environmental standards, better accessibility and better design. It also includes new minimum standards for the amount of floor space and private outdoor space.

Description of Impact – Service User Related

Service Area	Protected Group	Description of Potential Positive Impact	Description of Potential Negative Impact	Evidence Source
<p>OBJECTIVE 1: MEETING RISING HOUSING DEMAND</p>	<p>All but specifically: Age, disability and race</p>	<p>Meeting rising housing demand through the optimisation of the supply of new homes will improve outcomes for protected groups that are in housing need and over-represented on local authority housing waiting lists compared to the general population.</p> <p>The EqIA of the Housing Strategy 2011-15 identifies a number of equality issues that the delivery of new affordable housing addresses, including:</p> <ul style="list-style-type: none"> • The higher proportion of BME households applying for housing through the housing register compared to the general population • The fact that BME households are more likely to live in overcrowded accommodation, to be otherwise unsuitably housed and are over-represented among households accepted as homeless in Croydon. • The need for more housing that is wheelchair accessible, built to lifetime homes standards and meets other mobility standards, for example, downstairs facilities, level access and space for equipment. 	<p>New housing delivery, however, is constrained by the available financial resources, and also by the capacity, in terms of land, to provide it and the competing demands for the use of land. Croydon will only be able to provide housing for a proportion (approximately 70%) of the housing demand it will face, mainly through population growth, over the next 20 years.</p>	<p>Equality Impact Assessment – Housing Strategy 2011-15</p>

**OBJECTIVE 2:
INVESTING IN THE
NECESSARY
INFRASTRUCTURE**

Age, disability,
pregnancy &
maternity, race,
religion & belief,
sex, sexual
orientation

The Council has a clear and defined investment strategy for its infrastructure provision and its schools programme. Over the next 5 years c.£215m will be invested through the Council's Schools Programme and Connected Croydon, one of London's leading public realm initiatives. Network Rail is investing in significant upgrades to East Croydon Station, there is London Mayoral Investment in public spaces and TfL investment in public transport. Westfield and Hammerson investment in the retail core includes major public realm initiatives. In response, Croydon is now rapidly becoming the place for investors seeking a growth area in which to invest. One that offers a vibrant, diverse; a growing market; underpinned by new infrastructure investment.

Poor or inadequate infrastructure can hinder potential growth, weaken competitiveness and adversely affect the Councils homelessness reduction/ increase of housing delivery efforts.

Infrastructure investment is critical for the successful delivery of this strategy.

5-Year Housing
Delivery
Plan

<p>OBJECTIVE 3: EMBRACING NEW DELIVERY MODELS</p>	<p>Age, disability, pregnancy & maternity, race, religion & belief, sex, sexual orientation</p>	<p>The Council is committed to utilise all tools at its disposal to ensure successful delivery of the 5 year Housing Plan.</p> <p>This approach will enable the identification of new delivery models and joint venture partnerships, bringing together public and private sector developers and funders.</p> <p>There is also the commitment to prioritise a number of underused offices suitable for exploring residential conversions and identify partners and work up new models to enable delivery.</p>	<p>Constraints of the current market and viability challenges. There are several challenges in converting office space to residential. For example, depending on the shape of the building and how residential units might be configured around a central core, travel distances for means of escape and fire engineering purposes might in certain instances require an additional escape staircase to be inserted. The cost and time impact of major structural alterations to insert a new or modified core will tend to be significant, as will be the area loss.</p>
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Description of Impact – Employment Related				
Service Area	Protected Group	Description of Potential Positive Impact	Description of Potential Negative Impact	Evidence Source
	Age, disability, pregnancy & maternity, race, religion & belief, sex, sexual orientation	<p>The Council has aspirations that the borough of Croydon will provide current and future residents with a wide range of quality choices in homes, jobs and leisure opportunities.</p> <p>Major new schemes are advancing, with the proposed redevelopment of the Whitgift Centre by Westfield and Hammerson, delivery of offices for the first time in two decades and the potential of new jobs as a result.</p> <p>Construction work is good for the generation of local jobs and local economic activity, with every £1 of construction spending generating £2.84 of total economic activity.</p> <p>Every new home built can result in 1.5 jobs, therefore 9,500 new homes in this Plan could create 14,250 jobs.</p>	<p>Failure to deliver the proposed redevelopment of the Whitgift Centre.</p> <p>Losing local employment, for example following the making of a CPO, employers may decide to relocate and move their operations elsewhere.</p>	<p>CBI - Bridging the gap – Backing the Construction sector to generate jobs 2012</p> <p>CBI – 11/03/13 Statement to BBC.</p>

2.2 Is there any evidence missing? If so, how will you gather this missing evidence?

If you do not have all the evidence you need to make an informed decision, talk to your departmental equality lead about practical ways to gather it. For example, if you do not have time to conduct a survey, is there a way can increase your understanding before undertaking more robust research at a later date? Perhaps by meeting with stakeholders. The depth and degree of any consultation or research will be determined by the relevance of the change or review to different groups. Those who are likely to be directly affected should be consulted. Read the corporate public consultation guidelines before you begin (http://intranet.croydon.net/finance/customerservices/public_consultation/default.asp).

If you really cannot gather any useful information in time, then note its absence as a potential negative impact and describe the action you will take to gather it in section 3. Insert new rows as required.

Protected Group	Evidence missing	Description of potential negative impact
Age	Date of birth records for just over 1 in ten of council tenants. Age data for housing applicants and homeless households is complete as it is essential information for assessment and for monitoring service outcomes. Census data and population projections provide a good estimate of how the age distribution of the population is changing, and 2011 census will provide a detailed picture of the change over the past ten years very soon.	Without an adequate sample of this essential information, accurate monitoring and assessment of service outcomes is not possible.
Gender	Gender records are held for 100 per cent of council tenants. Gender data for housing applicants and homeless households is complete as it is essential information monitoring service outcomes. Census data and population projections provide a good estimate of how the gender	Without an adequate sample of this essential information, accurate monitoring and assessment of service outcomes is not possible.

	<p>distribution of the population is changing, and 2011 census will provide a detailed picture of the change over the past ten years very soon.</p> <p>Ethnicity information is not held for one in three council tenants. Ethnicity data for housing applicants and homeless households is complete as it is essential information for monitoring service outcomes. Census data and population projections provide a good estimate of how the diversity of our population is changing, and 2011 census will provide a detailed picture of the change over the past ten years very soon</p>	<p>Without an adequate sample of this essential information, accurate monitoring and assessment of service outcomes is not possible.</p>
Ethnicity		
	<p>Disability information is held for housing applicants and for council tenants. However, some of the tenancy data is held in "free text" fields making it difficult to analyse. Data is held on the "vulnerability" of homeless applicants in relation to their priority need for housing, which includes physical disability and mental illness or disability. Census data provides a good estimate of the extent of disability</p>	<p>Difficulties in analysing some data due to the way in which some tenancy data is held.</p>
Disability		
	<p>Significant gaps in data exist concerning sexual orientation in respect of council tenants, housing applicants and homeless households.</p>	<p>Equality and Human Rights Commission guidance on this protected characteristic is to collect it where relevant, and sexual orientation is not relevant to the majority of housing services, with the exception of tackling harassment.</p>
Sexual orientation		
	<p>Significant gaps exist in data concerning sexual orientation in respect of council</p>	<p>Any potential negative impact should be mitigated by the fact that Census data</p>
Religious belief		

	tenants, housing applicants and homeless households. belief in Croydon.	provides an good estimate of the diversity of religious belief.
Married/Civil partners	Marital status data is held for around one in three council tenants. It is not held in respect of the majority of housing applicants or homeless households.	Without an adequate sample of this essential information, accurate monitoring and assessment of service outcomes is not possible.
Gender reassignment	Significant gaps exists in data concerning gender reassignment; however, recent improvements in our data collection methods will address this gap over time, however we will only collect this data where relevant to service delivery.	Without an adequate sample of this essential information, accurate monitoring and assessment of service outcomes is not possible.
Maternity/Pregnancy	Significant gaps exist in our data concerning maternity/pregnancy; however, recent improvements in our data collection methods will address this gap over time.	Without an adequate sample of this essential information, accurate monitoring and assessment of service outcomes is not possible.

3. Determining Actions

The overall potential impact is the likelihood of the impact multiplied by the strength of that impact. The higher the score, the more significant the impact. The tables below identify actions to be taken to minimise negative impacts or maximise positive impacts within the programme.

Key

Likelihood score

5	Most certain	In more than 80% of the circumstances
4	Most likely	In 51-80% of circumstances
3	Possible	In 21-50% of circumstances
2	Unlikely	In 6-20% of circumstances
1	Rare	In 5% of circumstances or less

Strength score	Degree of impact	Proportion of protected groups affected
5	Very great impact	Several protected groups in more than one category (e.g. religion and gender) would be differently affected (compared to non-protected groups).
4	Great impact	Several protected groups in one category (e.g. religion) would be differently affected (compared to non-protected groups)
3	Some impact	All of one protected group would be differently affected (compared to non-protected groups)
2	Little impact	The majority of one protected group would be differently affected (compared to non-protected groups)
1	Minimal impact	A minority of one protected group would be differently affected (compared to non-protected groups).

3.1 Minimising Potential Negative Impacts

Ref	Protected Group	Potential Negative Impact	Likelihood Score	Strength Score	Overall Impact Score	Action	Action Owner	Date Action will be completed
1	Age, disability, pregnancy & maternity, race, religion & belief, sex, sexual orientation	Reduction in affordable housing supply	3	4	12	Maintain focus on affordable housing policy, negotiation with developers and proactive work with land owners and housing associations	Head of Housing Development & Regeneration (HDR)	On-going
2	Age, disability, pregnancy & maternity, race, religion & belief, sex, sexual orientation	Lack of private sector housing to meet housing need	3	4	12	Continued focus on innovative, entrepreneurial methods of procuring new supply. Negotiation with developers and proactive work with land owners and developers	Head of HDR	On-going
3	Age, disability, pregnancy & maternity, race, religion & belief, sex, sexual orientation	Increased homelessness resulting from HB welfare reform	4	4	16	Providing homes that are truly affordable. Effective use of S.106 powers. Mitigation action through providing information, negotiation with landlords etc	Head of HDR	On-going

4	Age, disability, pregnancy & maternity, race, religion & belief, sex, sexual orientation	Increased evictions from social housing	4	4	16	Engagement with Service Providers. Provision of Supported housing, tenancy support, monitoring outcomes of operational procedures, ensuring benefit and debt advice available	Head of Housing Needs and Strategy	On-going
5	Age, disability, pregnancy & maternity, race, religion & belief, sex, sexual orientation	Inconsistent and underperforming retail and leisure offer in the centre. This undermines residential and commercial amenity and constrains rental and capital values	4	3	12	Build on the momentum created, for example by the Hammerson-Westfield joint venture and other London based private commercial investors. This should see the retail and leisure offer restructured alongside the office offer, so that it competes on a like-for-like basis with other major centres (e.g. Stratford, White City etc.).	Executive Director Planning & Environment	On-going
6	Age, disability, pregnancy & maternity	Croydon faces structural issues in terms of underlying	4	3	12	Significant public realm improvements are being funded in Croydon's centre and high streets to improve accessibility and movement across the 1960s road infrastructure. As above but also look at sourcing additional funding such as gap funding, using	Executive Director Planning &	On-going

	maternity, race, religion & belief, sex, sexual orientation	local and macro-development economics. At the local level, development values in the centre of Croydon (i.e. rental and capital values realisable upon development) are in many cases insufficient to cover development costs (i.e. land/property acquisition, construction, fees, finance and profit).					S.106 contributions, RCGF/DPF etc.	Environment	

3.1 Maximising Positive Impacts

Ref	Protected Group	Potential Negative Impact	Likelihood Score	Strength Score	Overall Impact Score	Action	Action Owner	Date Action will be completed
1	Age, disability, pregnancy & maternity, race, religion & belief, sex, sexual orientation	Improve participation in the delivery of housing, especially amongst developers/RP's who have the capacity to deliver on a large scale	4	4	16	The Council to work with its partners to build on its significant delivery track-record and develop a more enhanced role to proactively seek out developers and other partners to make their sites work for them and for the benefit of local	Head of HDR	On-going

2	Age, disability, pregnancy & maternity, race, religion & belief, sex, sexual orientation	Improving stakeholder relations through the establishment of Croydon Housing Partners Congress – which brings together Registered Providers, Private Developers and Funders to form Joint Ventures to unlock stalled sites.	5	5	20	communities The new Croydon Housing Partners “Congress” will meet quarterly to review performance and share opportunities. Where needed a positive, proactive, enabling and investment role will be taken by the public sector.	Head of HDR	On-going

4. Decisions

4.1 Based on the information in sections 1-3, what are you going to do?

Decision	Definition	Yes/no
We will not make any major change to our project because it already includes all appropriate actions	Our assessment shows that there is no potential for discrimination, harassment or victimisation and that our project already includes all appropriate actions to advance equality and foster good relations between groups.	Yes
We will adjust our project	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through our project. We are going to take action to change our project to make sure these opportunities are realised.	No
We will continue our project as planned because it will be within the law	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through your project. 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.	Yes
We will stop our project	Our project would have adverse effects on one or more protected groups that are not justified and cannot be lessened. It would lead to unlawful discrimination and must not go ahead.	No

4.2 Next steps

You may find it useful to consult Appendix One before completing this section.

Does this analysis have to be considered at a scheduled meeting?	If so, please give the name and date of the meeting.	Yes Informal Meeting of Cabinet Members Monday 16
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	<p>When and where will this equality analysis be published?</p> <p>An equality analysis should be published alongside the policy or decision it is part of. As well as this, the equality assessment could be made available externally at various points of policy development. This will often mean publishing your analysis before the policy is finalised, thereby enabling people to engage with you on your findings.</p>	<p>September 2013</p> <p>Cabinet papers for the informal meeting of Members due to take place on Monday 16 September 2013</p>
<p>When will you update this analysis?</p>	<p>Please state at what stage of your project you will do this and when you expect this update to take place. If you are not planning to update this analysis, say why not.</p>	<p>An annual update will be undertaken, with the first due in September 2014.</p>
<p>4.3 I confirm that the information in sections 1 - 4 is accurate, comprehensive and up-to-date</p>		
<p>Officers that must approve this decision</p>	<p>Name and position</p>	<p>Date</p>
<p>Report author</p>	<p>Beverley Nomafo</p>	<p>8 August 2013</p>
<p>Director of Corporate Services</p>		
<p><i>Email this completed form to data.equalities@croydon.gov.uk, together with an email trail showing that the director is satisfied with it.</i></p>		
<p>4.4 Feedback from the corporate equalities team</p>		
<p>Name of equalities officer</p>	<p>Becky Saunders</p>	
<p>Date received by equalities team</p>	<p>13/08/13</p>	
<p>Feedback on decision</p>		

Please send this to the report author and democratic services, corporate programme office and procurement team as appropriate

Appendix one: decision making processes

You may only need to develop one equality analysis, updating it as you move from proposing the change to monitoring its implementation.

In many instances, an equality assessment will be started when a report is being written for a committee. If that report recommends that a project or programme takes place, the same equality assessment can be updated to track equality impacts as it progresses. If the project or programme includes commissioning or de-commissioning, the same equality assessment can be updated again.

Budget setting

For department budget setting, check that each line will have already have appropriate equality analysis under one of the other decision making processes. The corporate budget will be covered under the process for the report to full council.

How to use this table

This table outlines the key council decision making processes. Select the process on the top row that you are currently involved in, then read down the column to find out what to do when.

Decision making process	Report to committee, cabinet or full council	Project management	Programme management	Commissioning
Key contact	Solomon Agutu	Tony Snook	Tony Snook	Dawn Jolley
Link to process	Report Writing Instructions and Templates	Corporate Programme Office (CPO)	Corporate Programme Office (CPO)	Procurement Board
Develop section one of the equality analysis	When you start writing your report	Business case	Gateway 1/2	When you start writing your procurement strategy

Develop full equality analysis	Before you submit your report to CMT	Project initiation document	Gateway 3	report
Revise full equality analysis	When full council, cabinet or committee decision made or at key stages in any action plan included in the report	At the end of each project stage	At then end of each tranche	If the award report goes to Corporate Services Committee and as part of contract monitoring schedule
Write final full equality analysis	At the final stage of any action plan included in the report	Post project review	Gateway 6	Final monitoring stage
Who to send the equality analysis to	Corporate equality team and democratic services	Corporate equality team and project team	Corporate equality team and programme team	Corporate equality team and procurement team

Appendix two: data broken down by Protected Characteristics

The information below is taken from the 2011 census unless otherwise indicated.

Age groups	Number of people	Percentage
0-4 years	27,972	7.7%
5-7 years	14,388	4.0%
8-9 years	8,708	2.4%
10-14 years	23,130	6.4%
15 years	4,912	1.4%
16-17 years	9,934	2.7%
18-19 years	8,720	2.4%
20-24 years	23,591	6.4%
25 -29 years	27,692	7.6%
30-44 years	82,439	22.7%
45-59 years	70,488	19.4%
60-64 years	17,029	4.7%
65-74 years	23,155	6.4%
75-84 years	15,318	4.2%

85-89 years	3,881	1.1%
Over 90 years	2,021	0.6%
People with long term illnesses or disabilities	363,378	
Blind or visually impaired	These categories were not recorded as such in the 2011 census. However, this did record that there were 24,380 people (6.7%) whose day to day activities were limited a lot by long term illness or disability and 28,733 (7.9%) whose day to day activities were limited a little (Office of National Statistics)	
Deaf or hearing impaired		
Other communication impairment		
Mobility impairment		
Learning difficulty or disability		
Mental health condition		
HIV, multiple sclerosis or cancer		
Other (please specify)		
Gender		
Male	176,224	48.5%
Female	187,154	51.5%
Ethnicity	Number of people	Percentage
White British	171,740	47.3%
White Irish	5,369	1.5%
White Gypsy or Irish Traveller	234	0.1%
Other White background	22,852	6.3%
Black African	28,981	8.0%
Black Caribbean	31,320	8.6%
Other Black background	12,955	3.6%
Bangladeshi	2,570	0.7%
Chinese	3,925	1.1%
Indian	24,660	6.8%
Pakistani	10,865	3.0%
Other Asian background	17,607	4.8%
Mixed White and Black Caribbean	9,650	2.7%
Mixed White and Black African	3,279	0.9%
Mixed White and Asian	5,140	1.4%

Other Mixed background	5,826	1.6%
Arab	1,701	0.5%
Other ethnic group (please specify)	4,704	1.3%
Religion	Number of people	Percentage
Buddhist	2,381	0.70%
Christian	205,022	56.40%
Hindu	21,739	6.00%
Jewish	709	0.20%
Muslim	29,513	8.10%
Sikh	1,450	0.40%
No religion/faith	72,654	20.00%
Other (please specify)	2,153	0.60%
Sexual orientation	There are no figures from the 2011 census. However, it is estimated that there were 20,370 lesbians, gay men, bisexual and transgender people living in Croydon in 2001. (London LGBT)	
Lesbian		
Gay		
Bisexual		
Transgender	See above	
Transgender		
Pregnancy or maternity	These categories were not recorded as such in the 2011 census. However, there were 5,720 live births in 2011 (Office of National Statistics)	
Pregnant		
On compulsory maternity leave		
Marriage or civil partnership		
Married	122,013	42.9%
In civil partnership	796	0.3%