

EQUALITY IMPACT ASSESSMENT

The Equality Act 2010 places a ‘General Duty’ on all public bodies to have ‘due regard’ to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with ‘protected characteristics’ and those without them
- Fostering good relations between those with ‘protected characteristics’ and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on the Public Sector Equality Duty, please proceed to stage 2 and complete a full Equality Impact Assessment.

Stage 2 – Full Equality Impact Assessment

An Equality Impact Assessment provides evidence for meeting the Council’s commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an Equality Impact Assessment has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqlA to help inform their final decision. The EqlA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the council’s Equality Impact Assessment guidance before beginning the EIA process.

1. Responsibility for the Equality Impact Assessment

Name of proposal	Parking Charges & Permits
Service area	Commercial and Operations / Operations
Officer completing assessment	Ann Cunningham
Equalities/ HR Advisor	Daisy Daventry
Cabinet meeting date (if applicable)	March 2018
Director/Assistant Director	Stephen McDonnell

2. Summary of the proposal and its relevance to the equality duty

Please outline in no more than 3 paragraphs

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

Good parking management is an important tool that contributes towards wider policy objectives for delivering better road network management, reduced road danger, less motor traffic and pollution, improved conditions for walking, cycling and public transport use, raising the quality and amenity in the borough's public spaces.

Local authorities introduce residential parking schemes, also known as controlled parking zones (CPZs), in areas where there is extreme parking pressure and residents support proposals. Those schemes prioritise parking for residents and their visitors in the streets in and around their home. Residential permit holders can park without restriction throughout the CPZ operational hours, but non-permit holders can only park for a limited period, usually for up to two hours. Residents' visitors can also be given a visitor permit by the resident that they are visiting. Disabled badge holders may park free of charge for unlimited periods in parking bays.

Provision is made for businesses operating in the borough. This includes business permits for specific CPZ's or borough wide for those who travel throughout the borough. Motorists visiting the borough may use pay and display parking facilities.

When setting or reviewing parking charges the Council considers:

- The Council's transport and wider policy objectives
- Statutory or legal requirements that may affect the setting of fees
- Car ownership patterns
- The increasing demand for parking
- Traffic management issues
- Market conditions – (parking charges in other boroughs)
- Cost of delivering the service

This assessment considers the impact of a number of changes to parking policy. It focuses on the following proposals:

- Rationalising visitors parking permits. This will reduce the permit offer to one-hour permit (consecutive permits may be used to park beyond an hour) and a daily permit;
 - An increase in charge for the hourly permit to 80p per hour (in line with other boroughs);
 - Raising the age at which residents may access the concessionary VP scheme to 65 years of age and over.
 - Aligning most parking permit charges to the DVLA vehicle tax CO2 emissions bandings
 - Introducing a six-month permit option for residents and carers
- Removing the incrementally higher charge for additional cars per household.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	Haringey Equalities Profile http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	No impact
Gender Reassignment	Haringey Equalities Profile http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	No impact
Age	Haringey Equalities Profile http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	No impact
Disability	Haringey Equalities Profile http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	No impact
Race & Ethnicity	Haringey Equalities Profile http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	No impact
Sexual Orientation	Haringey Equalities Profile http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	No impact
Religion or Belief (or No Belief)	Haringey Equalities Profile http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	No impact
Pregnancy & Maternity	Not available	No impact
Marriage and Civil Partnership	Haringey Equalities Profile http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	No impact

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

Equalities monitoring data is not available for holders of parking permits. Data is not captured at the application stage for any permits, or requested when consulting about the implementation or review of CPZs. However, given that residents in any property in a CPZ who keep and use a vehicle are eligible for residential and visitor permits, ward level data from sources such as National Statistics are used for the purpose of evaluating the impact on different equalities groups.

- **Sex** Women make up 50.5% of Haringey's population.
 - **Gender Reassignment** This data is not held at a borough level. The Equality and Human Rights Commission estimate that there is between 300,000-500,000 transgender people in the UK
 - **Age** Haringey has a relatively young population - a quarter of the population is under the age of 20. The changes proposed to the concessionary visitor permit scheme will impact on residents aged between 60 and 65 years of age, who previously qualified for the reduced charge. At borough level, this age group accounts for 3.6% of the population. This information is not available at CPZ level, but at present approximately 75% of the borough is covered by Controlled Parking Zones.
 - **Disability** This shows that 14% of residents have a long term health problem that limits their day to day activity, lower than England but in line with London.
 - **Race and Ethnicity** Haringey is the 5th most ethnically diverse borough in the country. Over 65% of residents come from non-White British communities, compared to 20% in England, 55% for London and nearly 81% of our school children.
 - **Sexual Orientation** 3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013 (ONS Integrated Household Survey). In Haringey this equates to 6,491 residents.
 - **Religion** Haringey is one of the most religiously diverse places in the UK. The most common religion was Christianity, accounting for 45% of residents, less than London (48.4) and less than England (59.4%). The next most common religions were Muslim (14.3%) – higher than London (12.3%) - and Jewish (3%). Haringey had a lower percentage of residents who were Hindu (1.8%) and Sikh (0.3%) than London (5.0% and 1.5%, respectively). A quarter of Haringey residents stated that they did not have a religion, higher than London (20.7%).
 - **Marriage and Civil Partnership** Haringey has a higher proportion of couples in a registered same sex civil partnership than England and London. 0.6% (or 1,191 residents), compared to 0.2% for England and 0.4% for London.
1. **Increase in Parking Charges** There will be an increase in Hourly Visitor Permit charge from its current cost of 35p / hour. The current charge is cheaper than the hourly charge for Pay and Display which ranges from £1.40 to £3.10. This charge is also low when compared to many London boroughs. This will be raised to 80p, bringing it in line with other boroughs. Visitors Permits will also be rationalised to an offer of either hourly or daily permits, which can then be used consecutively. Households with lower incomes who do not qualify for concessionary charges may be negatively impacted by the increase in parking costs. This may include single parent households – more likely to be women – and BAME households (who have lower incomes than non-BAME households in Haringey).
 2. **The qualifying age for the concessionary Vulnerable Persons scheme will be raised to 65 years and over.** At present the concessionary VP scheme includes a 50% reduction in costs offered to residents who are registered disabled and to those aged 60 years and over. 60 years of age was the average retirement age when this scheme was introduced and it has not been reviewed since. It is now proposed that the qualifying age is increased to residents aged 65 years, bringing it in line with current average retirement ages.

3. **Aligning permit charges to the DVLA vehicle tax CO2 bandings.** The current charging structure links permit charges to vehicle CO2 emissions, which supports the Council's wider policy objective of tackling climate change, reducing carbon emissions, and encouraging the use of more fuel efficient cars. It also means that a higher charge will apply to higher polluting vehicles. The current four CO2 bands are based loosely on the DVLA (vehicle tax) model. Proposals now involve aligning our bands with the DVLA's 13 bands.
4. **The introduction of a 6 Monthly residential and carer permit.** At present only annual permits may be purchased. There appears to have been an increase in 6-month short hold tenancies, resulting in permit applicants purchasing an annual permit and then requiring a refund of the balance when they move. This results in unnecessary administration at cost. In addition, low income households may prefer the option of being able to purchase / renew their permit on a 6monthly basis.
5. **Removing the incrementally higher charge for 2 or more cars per household.** This simply involves a flat rate per permit irrespective of the numbers of cars per household. It is unlikely to have a negative impact on any household.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please provide a brief outline of:

- *How you intend to consult with those affected by your proposal including those that share the protected characteristics*

Further information on consultation is contained within accompanying EqIA guidance (part 9)

Consultation took place on the Council's wider budget proposals - responses were included as an appendix to the cabinet report of 14 February 2017, with some respondents to the consultation in favour of the CO2 banding.

A consultation has been undertaken on the recommendations in this report. Details of the proposals were published in local newspapers, the London Gazette and on the Council's website. Notices advising of the consultation and details of where to obtain further information were placed in prominent places throughout the borough. An email was sent to all existing CPZ permit holders who had given their details to the Council - in excess of 20,000 residents.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

Feedback to the consultation and the council's responses are outlined in the body of the report – none of the responses relate to the impact of the proposals on people from protected groups.

There is some concern regarding the increase in cost, which could have greater impact on households with a low income. The 6 monthly permit option will help mitigate impact.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqlA guidance (part 10)

- 1. Sex** *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Women are more likely than men to be primary carers to young children, and more likely than men to head single parent households. They therefore may be negatively impacted by increase in parking costs; however, the small increase in parking charges is proportionate to the aim of covering the administration costs of CPZs and is in line with parking charges in other boroughs. In addition, through the Transport Strategy Action Plans, carers to young children will be encouraged to take advantage of more sustainable travel options including car clubs, car sharing and better public transport.

Positive		Negative	X	Neutral impact	X	Unknown Impact	
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- 2. Gender reassignment** *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

There is insufficient data on whether people undergoing or who have undergone gender reassignment; however it is anticipated that the impact on people undergoing or who have undergone gender reassignment will be the same as for people who do not share this protected characteristic.

Positive		Negative		Neutral impact		Unknown Impact	X
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- 3. Age** *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

The changes proposed to the concessionary visitor permit scheme will impact on residents aged between 60 and 65 years of age, who previously qualified for the reduced charge. At borough level, this age group accounts for 3.6% of the population. This information is not

available at CPZ level, but at present approximately 75% of the borough is covered by CPZ so there will be a number of residents in this age bracket who will be affected.

Older people are more likely to be dependent on cars for travel. People aged 60 to 65 may be negatively impacted through the loss of concessionary rates; however, due to the increase in retirement age they should have the same ability to pay as other people of working age and therefore are not as vulnerable as people of retirement age. People aged 65+ will continue to benefit from concessionary discounts on parking charges.

Older people are more likely to have an age-related disability; however, if people aged 60 - 65 have a disability they should still qualify for disability concessionary rates.

Requiring people aged 60 - 65 to pay full parking charges in line with other people of working age is proportionate to the aim of covering the administration costs of CPZs while continuing to provide concessionary rates to more vulnerable residents in the borough. In addition, through the Transport Strategy Action Plans, all residents will be encouraged to take advantage of more sustainable travel options including car clubs, car sharing and better public transport.

Positive		Negative	X	Neutral impact	X	Unknown Impact	
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4. Disability *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

There will be no changes to charges for disabled people. Those registered as disabled can access the concessionary visitor permit scheme offering 50% reduction in costs. Disabled Blue Badge holders may also park free of charge in residential, shared use, pay and display and disabled bays. They may also park free of charge for up to 3 hours on yellow lines.

Positive		Negative		Neutral impact	X	Unknown Impact	
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5. Race and ethnicity *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

It is anticipated that the impact of these recommendations on people from Black and Minority Ethnic backgrounds will be the same as for people who do not share this protected characteristic.

Positive		Negative		Neutral impact	X	Unknown Impact	
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6. Sexual orientation *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

It is anticipated that the impact of these recommendations on people who identify as LGB will be the same as for people who do not share this protected characteristic.

Positive		Negative		Neutral impact	X	Unknown Impact	
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7. Religion or belief (or no belief) *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

It is anticipated that the impact of these recommendations on people in this protected group will be the same as for people who do not share this protected characteristic.

Positive		Negative		Neutral impact	X	Unknown Impact	
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8. Pregnancy and maternity *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Pregnant women and women with babies younger than 6 months old are more likely to be reliant on cars for travel. They therefore may be negatively impacted by increase in parking costs. However, the small increase in parking charges is proportionate to the aim of covering the administration costs of CPZs and is in line with parking charges in other boroughs. In addition, through the Transport Strategy Action Plans, carers to young children will be encouraged to take advantage of more sustainable travel options including car clubs, car sharing and better public transport.

Positive		Negative	X	Neutral impact		Unknown Impact	
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9. Marriage and Civil Partnership *(Consideration is only needed to ensure there is no discrimination between people in a marriage and people in a civil partnership)*

It is anticipated that the impact of these recommendations on people in a civil partnership will be the same as for people who are married.

Positive		Negative		Neutral impact	X	Unknown Impact	
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10. Groups that cross two or more equality strands e.g. young black women

There are no accumulative impacts identified in this proposal on people who identify with more than one protected characteristic.

Outline the overall impact of the policy for the Public Sector Equality Duty:

- Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?
- Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?

People aged 65+ and people who are disabled will continue to receive concessionary rates. People aged 60 – 65 will be negatively impacted by these proposals; however, they are of working age and therefore the change brings their charges into line with other working people.

Households with lower incomes who do not qualify for concessionary charges will be negatively impacted by the increase in parking costs. This is more likely to include single parent households – more likely to be headed by women – and BAME households (who in Haringey generally have lower incomes than non-BAME households). In addition, women are more likely to depend on cars due to pregnancy or because they are more likely to be primary carers to small children.

The small increase in parking charges is proportionate to the aim of covering the administration costs of CPZs and is in line with parking charges in other boroughs. In addition, through the Transport Strategy Action Plans, all residents will be encouraged to take advantage of more sustainable travel options including car clubs, car sharing and better public transport.

6. a) What changes if any do you plan to make to your proposal as a result of the equality impact assessment?

Further information on responding to identified impacts is contained within accompanying EqIA guidance (part 11)

Outcome	Y/N
No major change: the EIA demonstrates the policy is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.	Y
Adjust the policy: the EIA identifies potential problems or missed opportunities. Adjust the policy to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy.	N
Continue the policy: the EIA identifies the potential for adverse impact or missed opportunities to promote equality. Clearly <u>set out below</u> the justifications for continuing with it. For the most important relevant policies, compelling reasons will be needed.	N
Stop and remove the policy: the policy shows actual or potential unlawful discrimination. It must be stopped and removed or changed.	N

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact	Action	Lead officer	Timescale

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

The impact will be monitored through feedback from residents, Ward Councillors and other representative groups.

7. Authorisation

EIA approved by  (Assistant Director/ Director)	Date <u>8 March 2018</u>
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8. Publication

Please ensure the completed EIA is published in accordance with the Council's policy.