

EQUALITY IMPACT ASSESSMENT

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to the need 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 protected characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA 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 EqIA to help inform their final decision. The EqIA 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 EqIA process.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	Air Quality Action Plan 2019-24
Service area	Regulatory Services
Officer completing assessment	Felicia Ekemezuma
Equalities/ HR Advisor	Luke Rigg
Cabinet meeting date (if applicable)	12 th November 2019
Director/Assistant Director	Stephen McDonnell

2. Summary of the proposal

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*

Haringey Air Quality Action Plan (AQAP) 2019-2024

1. This proposal outlines the air quality actions that the London Borough of Haringey (The Council) will deliver in partnership with others between 2019-2024 in order to reduce concentrations of pollutants, and exposure to pollution; thereby positively influencing the health and quality of life of residents and those employed in or visiting the borough. The AQAP has been developed in recognition of Haringey's corporate priorities and the legal requirement for the local authority to work towards air quality objectives under Part IV of the Environment Act 1995 and relevant regulations made under that Act and to meet the requirements of the London Local Air Quality Management statutory process¹. The AQAP will be subject to an annual review and progress reporting.
2. Key Stakeholders –All Haringey residents/visitors/employees and employers, Regulatory Services, Planning, Public Health, Transport Planning, Procurement, Homes for Haringey DEFRA, GLA, Mayor of London, Neighboring local Authorities.
3. The draft Air Quality Action Plan will go to cabinet for sign off prior to statutory and public consultation and will return to cabinet for final approval after the consultation.

¹ LLAQM Policy and Technical Guidance. <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-boroughs>

² <https://www.equalityhumanrights.com/en/anghydraddoldeb-traws-wedi%E2%80%99i-adolygu/introduction-review>

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457752/nts2014-01.pdf

--

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 JSNA, 2011 Census ONS data, JMP report Haringey	<i>Equalities Scorecard</i>
Gender Reassignment	EHRC national data	
Age	Haringey JSNA, 2011 Census ONS data,	<i>Equalities Scorecard</i>
Disability	Haringey JSNA, 2011 Census ONS data, JMP report Haringey ONS Disability in England and Wales, 2011	<i>Equalities Scorecard</i>
Race & Ethnicity	Haringey JSNA, 2011 Census ONS data, JMP report Haringey	<i>Equalities Scorecard</i>
Sexual Orientation	ONS integrated household survey data,	
Religion or Belief (or No Belief)	Haringey JSNA, 2011 Census ONS data,	
Pregnancy & Maternity	Haringey JSNA, 2011 Census ONS data,	

Marriage and Civil Partnership	2011 Census	
<p>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?</p> <p><i>Explain how you will overcome this within the proposal.</i></p> <p><i>Further information on how to do data analysis can be found in the guidance.</i></p>		
<p>Key Findings</p> <p>Haringey is one of the most deprived areas of the UK (24th out of 236 local authorities in the UK) with Job Seekers Allowance claims the 2nd highest in London. This is particularly concentrated in the wards to the east of the borough.</p> <p>Air quality is a complex problem with a range of impacts on health and is a contributor to health inequalities. There is strong evidence that NO₂ and PM are harmful to health in a number of ways.</p> <ul style="list-style-type: none"> • Short term exposure is associated with: <ul style="list-style-type: none"> a) Worsening symptoms in those with pre-existing lung disease and asthma b) Increased risk of cardiovascular events including myocardial infarction and stroke • Long term exposure is associated with: <ul style="list-style-type: none"> a) Increased risk of developing cardiovascular disease b) Increased risk of developing cancer (especially lung cancer) c) Reductions in lung function for both children and adults d) Low birthweight (which leads to a higher risk of a range of complications and longer-term effects) <p>London has experienced significant reductions in NO_x emissions since 2008, and these have been replicated in Haringey. Nevertheless, parts of Haringey still routinely exceed European standards relating to air quality, including NO₂ and PM₁₀ and as such the whole of Haringey was designated an air quality management area in 2001.</p> <p>Poor air quality disproportionately affects groups with certain characteristics, such as:</p> <ul style="list-style-type: none"> a) Age: with the young and old being at particularly high risk b) Disability: Pre-existing health conditions including diabetes, respiratory symptoms and obesity c) Proximity to pollution sources d) Poor diet e) Deprivation <p>The Air Quality Action Plan will continue to drive the air quality agenda forward and ensure that Haringey leads by example and that improving air quality is embedded within all relevant Council strategies and policies.</p>		

Sex

The borough has a relatively equal gender split - just over half the population is female (50.5%) in line with England and London.

Research from 2013 has found that men in Haringey are more than three times as likely to cycle as women. The action plan demonstrates the Council's commitment to continuing its active travel programme of cycle promotion and training for its residents and refers to the Cycling and Walking Action Plan.

The National Travel Survey: England 2014 indicate that women are more likely to make short/local car trips as they tend to be the primary carers to young children, the elderly or disabled relatives. They may be negatively impacted by the ambition to reduce private car use, but should concurrently benefit from the improved public transport, improved walking and cycling routes, active travel planning via schools and the resulting cleaner air.

We will examine the barriers to this protected group and set out a list of actions needed to increase the proportion of this protected group making trips by bicycle and on foot in the borough.

At this stage, it is considered that the AQAP will have a positive impact on this protected characteristic.

Gender Reassignment

We do not hold data on the number of people who are seeking, receiving or have received gender reassignment surgery in Haringey. The Equality and Human Rights Commission estimate that there is between 300,000-500,000 transgender people in the UK¹. It is anticipated that people with this protected characteristic will not be disproportionately impacted by this policy and have no specific needs relating to this characteristic.

The Council will use the public consultation to support the identification of any potential impact.

Age – Children

The population in Haringey is relatively young with a quarter of the population under the age of 20, and 91% of the population aged under 65.

Children make up a quarter of the population and are concentrated in wards in the east of the borough where deprivation is highest. Over 1 in 3 children in Haringey live in poverty.

Air pollution disproportionately affects the young. Studies have shown that the lung development of a baby exposed to air pollution in the womb can be altered, and it affects birth weight.

Young children are also more vulnerable to breathing in polluted air than adults. For their size, they breathe more air each minute than an adult. Buggies and prams put them at the level of

car exhausts. If a child breathes high levels of air pollution over a long period, they might be at risk of:

- their lungs not working as well as they grow older
- developing asthma during childhood or as an adult - and if they have asthma already, air pollution can make it worse
- wheezing
- coughs
- lung cancer when they're older
- infections like pneumonia

Children will therefore benefit from the drive to improve air quality.

Three Schools in the east of the borough received Air Quality Audits and the recommendations are likely to have a positive impact on the pupils. Learning from these audits will be rolled out across the borough.

Childhood obesity remains a problem in Haringey. 23.03% of reception children and 36.67% of year 6 children in Haringey schools are overweight or obese. There is a clear relationship between the prevalence of obesity and the level of deprivation for both reception and year 6 children. Research has found that in Haringey children aged 5-19 years are the age group to cycle most frequently. This group will therefore be targeted by the active travel options and therefore should receive increased health benefits.

Age - Older People

Elderly residents in the more deprived parts of the borough are particularly vulnerable to poor air quality.

The air quality action plan will have a positive impact on this groups by reducing pollution sources and pollution exposure, this group will also receive health benefits from the increased focus on active travel and public transport options. The Council will use the public consultation to support the identification of any potential impact.

Disability

Census data shows that 14% of residents have a long-term health problem that limits their day to day activity - lower than in England but in line with London. 5.7% of residents report being in bad health, slightly higher than England and London.

Reducing toxic pollutants such as NO₂, PM₁₀ & PM_{2.5} will benefit people with pre-existing health conditions such as chronic obstructive pulmonary disease (COPD) and asthma, whereas those residents suffering from obesity will benefit from the active travel options.

At this stage, it is considered that the AQAP will have a positive impact on this protected characteristic. The Council will use the public consultation to identify any potential impact.

Race and Ethnicity

Haringey is the 5th most ethnically diverse borough in the country. 66% of residents come from non-White British communities compared to 20% in England and 55% for London. Nearly 81% of our schoolchildren come from a non-white community. 190 different languages are spoken in Haringey schools - almost half of all pupils in Haringey Schools speak English as an additional language. Non-White British communities are concentrated in deprived areas rising to 83.4% of the population in Northumberland Park, the most deprived ward. Studies have shown that there is a strong correlation between deprivation and pollution. Homes and residences in highly deprived areas tend to be more condense, nearer to roads with high concentration of pollution and less green space.

It is therefore thought that this group will greatly benefit from improvements in air quality and a reduction in exposure to pollution.

Sexual Orientation

The ONS estimates that 3.7% of Haringey's population are lesbian, gay or bisexual (LGB) which is the 15th largest LGB community in the country. There are no specific needs identified for LGB people in the borough and it is thought that they will not be disproportionately impacted by the strategy.

This group like all other residents should benefit from the improvements in air quality and reduction in exposure to pollution.

At this stage, it is considered that the AQAP will not disproportionately impact this protected characteristic, however the Council will use the public consultation to identify any potential impact.

Religion or Belief

Haringey is one of the most religiously diverse places in the UK. The most common religion is Christianity, accounting for 45% of residents, less than London (48.4) and less than England (59.4%). The next most common religions are Islam (14.3%) higher than London (12.3%) - and Judaism (3%) higher than England & Wales. Haringey has a lower percentage of residents who are Hindu (1.8%) and Sikh (0.3%) than London (5.0% and 1.5%, respectively). A quarter of Haringey residents stated in the 2011 Census that they did not have a religion, higher than London (20.7%).

It is considered, at this stage, that there are no specific needs identified for faith groups in the borough and therefore they should not be disproportionately impacted by the air quality action plan.

The Council will use the public consultation to identify any potential impact.

Pregnancy and Maternity

Long term exposure to air pollution is associated with low birthweight (which leads to a higher risk of a range of complications and longer-term health effects).

Women in Haringey who are pregnant or are caring for young babies will also fall into other vulnerable groups and groups with protected characteristics.

Although pregnant women may not be able to access all of the opportunities available via active travel, they will benefit from the resultant improvements in air quality and reduction in exposure to pollution.

Marriage and Civil Partnership

In 2011, Haringey had 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.

People who are in a civil partnership have no identified specific needs in relation to the air quality action plan. However, they may fall into a vulnerable group or in a group with other protected characteristics.

At this stage, it is considered that the AQAP will not have a disproportionate impact on this protected characteristic. The Council will use the public consultation to identify any potential impact.

Engagement to date:

The draft plan was written with the engagement of all key stakeholders, including local community groups and Councillors. Four workshops were held during the initial drafting of the document, which were attended by Council staff, Members and the local community.

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 outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

Public consultation on the Draft Air Quality Action Plan will take place in May 2019. The consultation will involve public exhibitions, the use of social media including twitter, an online questionnaire as well as availability in accessible formats and information via a dedicated web page.

The needs of protected groups will be considered when deciding how to consult:

- The time and location of the exhibitions will be chosen so as not to exclude any group
- Accessible locations will be chosen in different parts of the borough. The timing of exhibitions will allow for those who work or have childcare commitments the opportunity to attend

- Exhibition boards will be designed to summarise the key points of the action plan to assist the visually impaired or those who have difficulty reading. Officers will be on hand to explain the action plan and to take note of any comments received. The locations will be chosen because they are frequently used, particularly by school children, parents and older people.
- The council will send out emails to notify a range of stakeholders including schools, neighbouring boroughs, community groups including groups representing the elderly, resident association, and religious groups.
- For those who do not have access to the internet, copies of the strategy will be placed in all Haringey libraries and the Civic centre to review.

Consultation will provide residents with an opportunity to inform the council about the particular impacts on protected groups. The findings of the consultation will inform the final version of the AQAP

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?

Public Consultation took place between 28th May and the 30th July 2019. The Council used a variety of consultation techniques including:

- An online questionnaire which was available in accessible formats, launched on the Council's website on the 28th of June;
- Information leaflets and questionnaires were available at all major libraries;
- 3 public, 2 members and 2 specialist groups workshops were delivered to provide opportunities for further stakeholder engagement.

The following key statutory consultees were also consulted directly by email:

- Local MPs and Members
- Secretary of State
- Environment Agency
- Transport for London
- All neighbouring local authorities, in particular the North London Cluster Group
- Bodies representing local business interests and other organisations such as North London Chamber of Commerce and Enterprise
- Local schools and colleges
- The Greater London Authority (GLA) was consulted during the development stage and will be consulted again on the final issue of the document.

A total of 248 general public consultees responded to the AQAP consultation;

84% were from Haringey resident;
1% Haringey Business
8% Work in Haringey
5% Regular visitor
2% Other please

Eleven consultation responses were received from statutory stakeholders.

The majority of respondents most interest in air quality were age between 30-44:

0%	<24
5%	24-29
40%	30-44
30%	45-59
7%	60-64
12%	65-74
2%	75-84
1%	85 -94
2%	did not provide an answering to this question

Response were from a variety of people including:

4%	Deafness or partial loss of hearing
0%	Developmental disorder
2%	Mental ill health
2%	Physical disability
2%	Other disability
1%	Learning disabilities
4%	Long term illness or condition
46%	No disabilities
39%	did not provide an answer to this question

Unfortunately, most questions in the Equal Opportunities Monitoring Form were not completed.

The results of the consultation revealed that the proposed measures are generally acceptable. The consensus was that a combination of complementary initiatives is key to creating a positive impact in both the short and longer-term on-air quality in Haringey.

Emission from traffic is the main source of pollution in Haringey, initiatives with evidence of positive impacts on air quality in the short term such as traffic reducing interventions including more charging points, enforcement, infrastructures and traffic management should be given priority. Pedestrianisation, road closures, temporary and permanent car free days as well as green infrastructure were particularly recommended as priority measures by most respondents.

The consensus among the consultees was that good public transport coverage, good cycle and walking infrastructure, linked with discouraging private use of petrol and diesel fuelled cars and encouraging alternative forms of transport could help residents and businesses improve air quality.

Better transport planning as well as a communications strategy to build public awareness on air pollution was considered necessary to deal with pollution. In the longer term, behavioural change strategies to move people away from car use were considered warranted.

As with all London borough councils, vehicle idling was the most discussed problem. Stricter enforcement measures were recommended around schools and other vulnerable receptors.

Air pollution monitoring and audits were recommended at each school within Haringey.

Changing parking policies by increasing parking charges in line with the surrounding boroughs was suggested as source of additional revenue and to help reduce transboundary diesel car pollution.

More bold and ambitious actions with specific targets by Haringey Council will be welcome by the residents. Further details of the consultation responses and proposed actions from Haringey Council are presented in the consultation report attached as Appendix A.

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

1. Sex

At present it is thought that the air quality action plan will have a positive impact to all residents regardless of gender it is also thought that it will have a positive impact on women who tend to make more trips within the borough in relation to childcare, school runs and caring for elderly or disabled relatives.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

2. Gender reassignment

It is not known whether the air quality action plan will have either a positive or negative impact on people undergoing or who have undergone gender reassignment, however it is thought that it will have a positive impact on everyone.

The public consultation failed to identify any information relevant to this protected group.

Positive		Negative		Neutral impact		Unknown Impact	X
----------	--	----------	--	----------------	--	----------------	---

3. Age

Children and older people are particularly vulnerable to poor air quality and will benefit from improved air quality and reduced exposure to air pollution.

The consultation demonstrated a real need for reducing pollution around sensitive receptors i.e. near school, hospitals, care homes and pedestrians. Recommendations made have been incorporated into the AQAP or already referenced in other policies and strategies across the Council.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

4. Disability

The air quality action plan will have a positive impact on disabled people, particularly those with pre-existing health conditions such as asthma, chronic obstructive pulmonary disease, diabetes by improving air quality and reducing exposure to pollution. The active travel actions will also assist this group.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

4. Race and ethnicity

This group are particularly vulnerable to poor air quality due to their homes and residencies being near areas where pollution levels are high. They will positively benefit from improvements in air quality and a reduction in exposure to pollution

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

6. Sexual orientation

It is anticipated that the impact on people with this protected characteristic will be the same as for people who do not share this protected characteristic.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

7. Religion or belief (or no belief)

It is anticipated that the impact on people with this protected characteristic will be the same as for people who do not share this protected characteristic.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

8. Pregnancy and maternity

Pregnant women and unborn children are particularly vulnerable to poor air quality as it is associated with low birthweight and subsequent health conditions. This group will benefit from improvements in air quality and a reduction in exposure to pollution.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

9. Marriage and Civil Partnership

It is anticipated that the impact on people with this protected characteristic will be the same as for people who do not share this protected characteristic. This group will benefit from improvements in air quality and a reduction in exposure to pollution.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

10. Groups that cross two or more equality strands e.g. young black women

Black and Ethnic Minority (BAEM) Children

Many people will identify with more than one protected characteristic. For example, more than 70% of the borough's young people are from ethnic minority backgrounds and may also fall into one or more of the groups with protected characteristics.

The plan has focused more of its actions in the East of the borough as people that reside in the area are more likely to be deprived and exposed to higher levels of pollution. As the overall impact of the action plan is to improve air quality and reduce people's exposure to air pollution, it is anticipated that all groups will experience a positive impact.

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?

This includes:

- a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
- b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
- c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?

The strategy is not considered to result in any direct/indirect discrimination for any groups that share the protected characteristics.

The Air Quality Action Plan is considered to have a positive effect on all residents in Haringey and in particular it should have a positive impact on:

- The vulnerable groups such as the young, elderly and those with pre-existing health conditions, by reducing the risk of symptoms such as underdeveloped lungs, on set of Asthma, aggravation of coronary/pulmonary diseases.
- BAEM and the deprived – as a large number of them live in the East of the borough where exposure to pollution is higher.

The action plan ties into a range of other borough plans, strategies and policies that will also drive air quality improvements.

- All residents, but in particular the young, elderly, disabled and pregnant mothers will be encouraged to take up active travel options which will improve their health and foster good relations with others who already participate.

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 EqlA guidance

Outcome	Y/N
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	Y
Adjust the proposal: the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	N
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	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 and which protected characteristics are impacted?	Action	Lead officer	Timescale
N/A			

Please outline any areas you have identified where negative impacts will happen as a result of the proposal, but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

None

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

Progress on each of the actions in the air quality action plan will be reported on annually to central government and published on the Council website

7. Authorisation

EqlA approved by 
(Assistant Director/ Director)

Date 24/10/19

8. Publication

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

Please contact the Policy & Strategy Team for any feedback on the EqlA process.