



EQUALITY IMPACT ASSESSMENT

1. Responsibility for the Equality Impact Assessment

Name of proposal	Alexandra Palace Car Park Charging
Business area	Strategic Projects (Executive Team)
Lead	Louise Johnson (Strategic Programme Manager)
Decision meeting date (if applicable)	APPCT 14 September 2020

2. Summary of the proposal

Following feasibility work and a public consultation the Trustees of Alexandra Park and Palace are considering implementing reasonable parking charges at Alexandra Palace to generate additional income for the Charity in order to continue to deliver its charitable objects. The increasing levels of traffic and demand for parking causes strain on the parkland, increasing maintenance costs, which the Charity is already struggling to meet. The level of non-visitors using the car parks, often engaging in antisocial behaviour, is also on the rise but the Charity does not currently have the resources to deal with this. Implementing parking charges would provide funding to assist in monitoring, maintaining and managing the car parks. The charges and installation of car parking infrastructure such as ANPR cameras will also act as a deterrent to anti-social behaviour, creating a more pleasant and safer environment for visitors to the Park and Palace.

The proposal has taken into account the broad range of user groups and a number of discounts or exemptions are proposed for certain users. The principle that has been applied when making a recommendation regarding discounts or exemptions is whether the user group already contributes to the charity, financially, whether it can be evidenced that the user group would be significantly financially disadvantaged in relation to the general public and other similar sites and whether the activity itself is in accordance with the charity's mission of providing enjoyment and recreation for public benefit.

The Board sought the views of the Charity's Trading Subsidiary and Advisory & Consultative Committees, initially in January 2019 and in the feedback period. Further consultation with these groups will take place in September 2020. 2,121 responses to the public survey were received and a further 20 people attended public drop-in sessions.

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?

Protected group	Service users	Staff
Sex	Survey (ran Nov 2019 – Jan 2020)	Survey (ran Nov 2019 – Jan 2020)
Gender Reassignment	Survey (ran Nov 2019 – Jan 2020)	Survey (ran Nov 2019 – Jan 2020)
Age	Survey (ran Nov 2019 – Jan 2020)	Survey (ran Nov 2019 – Jan 2020)
Disability	Survey (ran Nov 2019 – Jan 2020)	Survey (ran Nov 2019 – Jan 2020)
Race & Ethnicity	Survey (ran Nov 2019 – Jan 2020)	Survey (ran Nov 2019 – Jan 2020)

Sexual Orientation	Survey (ran Nov 2019 – Jan 2020)	Survey (ran Nov 2019 – Jan 2020)
Religion or Belief (or No Belief)	Survey (ran Nov 2019 – Jan 2020)	Survey (ran Nov 2019 – Jan 2020)
Pregnancy & Maternity	Haringey Equalities Profile	N/A
Marriage and Civil Partnership	Haringey Equalities Profile	N/A

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?

The online survey consisted of a series of closed questions to determine:

- Frequency and reasons people visit APP;
- How people travel to APP;
- Where people visiting APP are travelling from;
- People's views on the introduction of parking charges at APP;
- What, if any, impact the introduction of parking charges would have on people's visits to APP

These questions were supplemented with several open questions enabling respondents to provide more detailed answers about their views on the parking charge proposals. Demographic questions were also asked to ensure that respondents reflect the breadth and depth of different people who visit APP and determine whether the proposals affect some visitors more than others.

A total of 2,121 surveys were completed, made up of 2,118 (99.9%) online surveys and a further 3 (0.1%) hardcopy surveys.

Age and gender

The greatest proportion of respondents were aged 45-54, accounting for almost a third (29%). Approximately one of seven was under the age of 35. Just over half (55%) of respondents were female.

Health problem or disability

Three quarters of respondents (76%) reported having no limitations, but one in seven respondents reported their day-to-day activities were limited by a health problem or disability.

Ethnicity

More than half (60%) reported their ethnicity as White – British, a tenth (12%) as White – any other white background and 3% as White – Irish. One in six preferred not to say (16%) and the rest (9%) were made up of a mixture of different ethnic groupings.

Religion

The highest proportion (44%) said they had no religious beliefs. A quarter were Christian (25%), and a fifth (22%) preferred not to say. The remaining 8% were Jewish (3%), Muslim (1%), Hindu (1%), don't know (1%) and other (3%).

Household Income

The majority (51%) preferred not to say. Approximately one fifth (22%) of respondents were in households with income below £50,000. A tenth reported a household income of over £100,000. The median income band of the 994 respondents who provided details was £50,001-£60,000.

The survey did not ask questions about Sexual Orientation or Marriage and Civil Partnership. [Haringey's Equalities Profile](#) can be used in lieu.

There is no data on Pregnancy and Maternity.

Parking displacement was the key perceived negative impact, felt by a total of 980 of all respondents.

Other perceived negative impacts were:

- Reduced visitor numbers (350);
- Increased traffic/ congestion in the local area (139);
- Disproportionate impact on certain users groups (136)

A total of 136 respondents expressed concerns about the potential disproportionate impact on some user groups. The greatest number questioned the affordability of parking charges for households on low income (43) and children who might miss out on recreational/ sporting opportunities (41). Disabled visitors (21) and elderly visitors (18) were also thought to be disadvantaged by the proposals, particularly as there was a perception that these groups might not meet the Blue Badge criteria.

Low income households

Half of the 43 respondents who expressed concerns about the disproportionate impact of parking charges on low income households preferred not to state their income. Of the 21 respondents who stated their income, 12% reported a household income of £20,001 - £30,000 and 12% a household income of £30,001 - £40,000. It is difficult to say with any certainty whether those respondents that raised concerns about the impact on low income households were actually from low income households themselves, as so many respondents did not state their income.

Disability/ health issues

Of those that mentioned impacts on disabled visitors (21 respondents), 57% (12) reported that their day-to-day activities are limited due to a health problem or disability.

Elderly visitors

Eight (44%) of the 18 respondents who expressed concerns about the impact on elderly visitors were aged over 64 years. A fifth (22%) were aged under 45 years.

Many respondents put forward suggestions about changes to the proposals to address the concerns they identified. Around 500 suggestions were given, including:

- Providing free/ discounted parking for certain user groups (181);
- Reducing the proposed parking tariffs (93); and
- Increasing the grace period (48)

User Groups

A total of 181 respondents suggested that discounted or free parking should be provided for certain user groups or facilities users. The central suggestion expressed was that those users who were already paying to use the facilities at APP should receive some sort of dispensation from the proposed parking charges.

In addition to the surveys, the Trust received 25 supplementary email comments/ responses from individuals and organisations via the consultation@alexandrapalace.com inbox (of the 25, 13 opposed the proposals, 3 supported, a further 2 were conditionally supportive and the remaining 6 were neutral). Of the 25 comments/ responses, nearly half (12) suggested exemptions be provided for certain user groups.

Following the survey and its analysis the group of people disadvantaged disproportionately were regular and frequent paying users of the Park and Palace who because of their regularity and frequency of use and the nature of that use means that the cumulative cost of parking could be prohibitive to them continuing to use the facilities.

In direct response to these comments, the Trust has undertaken an exercise to ascertain whether certain user groups do warrant a discount or exemption. One of the key tests is whether the user group already contributes to the charity, financially, whether it can be evidenced that the user group would be significantly financially disadvantaged in relation to the general public and other similar sites and whether the activity itself is in accordance with the charity's mission of providing enjoyment and recreation for public benefit.

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?

We endeavoured to make the survey as accessible as possible. It was available in several formats – online, as a paper version, and we offered the option of large print and other languages (although we did not get any requests for this). The survey was live for 60 days to give people enough time, and we advertised through a number of forums – on site, a 9,000 home letter drop, via social media channels, mail outs and in the press. We sent targeted emails to certain user groups through our database too (including Ice Rink customers and Creative Learning attendees).

As highlighted above, we have undertaken a robust assessment of the impact of the proposals on certain user groups following analysis of the survey results. In total, 34 different user groups were examined. The recommendation is that we will allow a discount or an exemption for 18 of those user groups.

The difficulty with surveying in advance of a proposal being implemented means that it captures perceptions and potential behaviours, not actual behaviours and impacts. We will monitor feedback within the first year of operation and will review as necessary. Future consultations and feedback will include analysis of views by protected characteristics as a means of monitoring the introduction of car park charges. We will monitor on an annual basis for 5 years.

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

Age and gender

The greatest proportion of respondents were aged 45-54, accounting for almost a third (29%). Approximately one of seven was under the age of 35. Just over half (55%) of respondents were female.

Health problem or disability

Three quarters of respondents (76%) reported having no limitations, but one in seven respondents reported their day-to-day activities were limited by a health problem or disability.

Ethnicity

More than half (60%) reported their ethnicity as White – British, a tenth (12%) as White – any other white background and 3% as White – Irish. One in six preferred not to say (16%) and the rest (9%) were made up of a mixture of different ethnic groupings.

Religion

The highest proportion (44%) said they had no religious beliefs. A quarter were Christian (25%), and a fifth (22%) preferred not to say. The remaining 8% were Jewish (3%), Muslim (1%), Hindu (1%), don't know (1%) and other (3%).

There were no findings that demonstrated that any of the groups that share protected characteristics would be disproportionately disadvantaged by the introduction of charges.

As highlighted above, we have undertaken a robust assessment of the impact of the proposals on certain user groups. In total, 34 different user groups were examined. The recommendation is that we will allow a discount or an exemption for 18 of those user groups. We will monitor feedback and undertake visitor surveys within the first year of operation and will review as necessary.

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

1. Sex

Women are more likely than men to be the primary carers of young children, and more likely than men to head single parent households. They therefore may be negatively impacted by car park charges; however more sustainable travel options may result in them benefiting from reduced air pollution.

Positive	x	Negative	x	Neutral impact		Unknown Impact	
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2. Gender reassignment

There is insufficient data on people undergoing or who have undergone gender reassignment, however it is anticipated that the impact on people who share this protected characteristic will be the same as for people who do not share this protected characteristic. Parking charges will therefore have a neutral impact on Gender Reassignment as parking charges apply to everyone, regardless of Gender Reassignment, who chooses to drive and park at the Palace (apart from blue badge holders).

Positive		Negative		Neutral impact	x	Unknown Impact	
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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)*

Older people may rely in the car more so parking charges may have a negative impact financially, however on the flipside, parking charges may encourage people to find alternative more sustainable ways to travel, meaning less congestion and pollution in the immediate area and more choice of spaces to park.

Positive	x	Negative	x	Neutral impact		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)*

Parking charges will have a neutral impact on Disability as parking charges will not apply to those who hold a Blue Badge. We have also identified certain user groups that will be exempt from parking charges on the grounds of Disability, who may not have a Blue Badge.

As an indirect benefit, if there are less cars parking on site, there will be improvements in air quality and road safety in the immediate area which will likely benefit older people, younger people, those with disabilities and/or long-term health conditions.

Positive	x	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)

Those on low incomes, who are more likely to be from BAME communities may be negatively impacted financially. However as an indirect benefit. If there are less cars parking on site, there will be improvements in air quality and road safety in the immediate area.

Positive	x	Negative	x	Neutral impact		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 parking charges will have a neutral impact on Sexual Orientation as parking charges apply to everyone, regardless of Sexual Orientation, who chooses to drive and park at the Palace (apart from blue badge holders).

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 parking charges will have a neutral impact on Religion or Belief as parking charges apply to everyone, regardless of Religion or Belief, who chooses to drive and park at the Palace (apart from blue badge holders).

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 financially by parking charges. However as an indirect benefit, if there are less cars parking on site, there will be improvements in air quality and road safety in the immediate area which will benefit expectant mothers and mothers.

Positive	x	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 parking charges will have a neutral impact on Marriage and Civil Partnership as parking charges apply to everyone, regardless of Marriage and Civil Partnership, who chooses to drive and park at the Palace (apart from blue badge holders).

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

Older BAME people may be more impacted by parking charges, but would also benefit from improved road safety and reduced pollution levels in the immediate area.

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

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

The parking charges proposal is designed to bring benefits to all beneficiaries of Alexandra Park and Palace. All monies raised by parking charges, as with all income raised from our activities on site, will be invested in our charitable purposes. We also believe that managing our car parks through charging will help to deter the increasing levels of antisocial behaviour that has a negative impact on our visitors' enjoyment, our neighbours, and which increases our security, repair and litter collection costs.

In addition, if by introducing charges we encourage people to walk, cycle and use public transport more often, it will reduce the level of traffic on site and benefit the Park and visitor enjoyment of it.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Outcome	Y/N
No major change to the proposal: the EqIA 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 EqIA 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 relevant protected characteristics are impacted?	Action	Lead officer	Timescale
Introducing of parking charges reducing the reliance on the private car and encouraging people to take more sustainable	Monitor charging and use further consultations to collect views from those in particular that need to use cars	Strategic Programme Manager	Ongoing

travel, will affect older people and older BAME people and women who are more likely to rely on cars			
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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.

N/A

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 the data collected by the system installed, the discounts/ exemptions taken up by those in certain user groups, and by an annual survey.