

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 between those with a ‘relevant protected characteristic’ and those without one;
- Fostering good relations between those with a ‘relevant protected characteristic’ and those without one.

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 protect 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	Surcharge on diesel fuelled vehicles using stop and shop parking
Service area	Operations
Officer completing assessment	Greville Percival
Equalities/ HR Advisor	Melissa Nalubwama-Mukasa
Cabinet meeting date (if applicable)	January 2021
Director/Assistant Director	Stephen McDonnell, Director of Environment and Neighbourhoods

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*

Surcharge on diesel vehicles using short term parking facilities

The Council's MTFS Report develops several measures initially outlined in the 2019 *Parking Transformation Programme* designed to provide accessible parking for all users, discourage unnecessary use of higher-polluting vehicles, and encourage more use of sustainable travel modes.

While use of public transport and travel is discouraged during the current Covid restrictions, the proposed diesel surcharge is not planned to take effect until late 2021 by which time it is anticipated that Covid transmission and infection will be mitigated by the comprehensive vaccination programme carried out at local vaccination centres, GP surgeries, and pharmacies. Reduced vehicular traffic as a result of Covid restrictions has confirmed the improved air quality as a result.

The main element of the policy subject to this EqlA are:

- Diesel Surcharge. This proposes a 25% surcharge on all diesel-fuelled vehicles using stop and shop facilities. Stop & Shop refers to pay-to-park parking bays mainly located in town centre shopping and services locations. They include pay-to-park bays within Controlled Parking Zones. This measure will support the delivery of the transport strategy and air quality action plan objectives.

The Ultra-Low Emission Zone (ULEZ) introduced in central London in April 2019 is due to be extended up to the North Circular Road in 2021. Consultations confirm that many motorists commuting into central London frequently use boroughs outside the current ULEZ zone to park and then use the Tube to travel to central London. Construction vehicles and delivery vans cause significant parking congestion in Haringey – including at the current time of Covid restrictions. Increased protective measures such as diesel surcharges remain very important in terms of reducing vehicular pollution and improving air quality in areas such as Tottenham and Wood Green which continue to experience significant traffic volumes and parking demand.

Key Stakeholders

Key Stakeholders comprise all residents and those who need to use public highway parking facilities and pay to park bays. Key stakeholders also comprise those who use public transport, walk, and cycle - including Haringey residents, businesses, and services. Those with disabilities, young children, expectant mothers, and older people are groups most at risk from toxic air pollutants and who will benefit significantly from lower air pollution levels.

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 EqlA 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 GLA London Ward Profiles https://londondatastore-upload.s3.amazonaws.com/instant-atlas/ward-profiles-html/atlas.html	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 GLA London Ward Profiles https://londondatastore-upload.s3.amazonaws.com/instant-atlas/ward-profiles-html/atlas.html TfL Roads Taskforce Technical note 12: http://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.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	Census 2011 TfL Roads Taskforce Technical note 12: http://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf	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.

Current data suggests that 32% of vehicles using stop and shop parking bays are diesel fuelled. However, given the forthcoming ULEZ implementation and other modal changes set out in the *ULEZ Readiness* programme this is expected to reduce. Vehicles using stop and shop (previously known as 'Pay and display') are operated by non-residents as well as by Haringey residents and businesses. However, in terms of equalities impact assessment, given that residents in any CPZ who keep and use a vehicle are eligible for residential and visitor permits, ward level data from sources such as the Office for National Statistics (ONS) are used for the purpose of examining the impact on different protected groups. We also use public and statutory consultations to help identify issues affecting protected 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 are 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. At borough level, this age group accounts for 4% of the population.
- **Disability** 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 and is the third highest London Borough for in-migration from Eastern European countries. 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 6,500 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%), Jewish (3%). Hindu (1.8%) and Sikh (0.3%). 25% of Haringey residents stated that they did not have a religion, This compares with 21% for London.
- **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.

Haringey is one of the most deprived areas of the UK (24th out of 236). Haringey is also in the top three London Boroughs for Eastern European in-migration. Job Seekers Allowance claimants are the 2nd highest in London. Therefore, some lower-income households will struggle with the cost of car ownership if they drive older, higher polluting vehicles due to the financial implications of the diesel surcharge. However, the improved air quality identified after the introduction of Covid restrictions confirm the substantial health benefits that can be achieved by reduced presence of polluting vehicles

Impact on Service Users / Inequalities Identified

While use of public transport and all travel is strongly discouraged during the current Covid restrictions, the proposed diesel surcharge is not planned to take effect until late 2021 by which time it is anticipated that Covid transmission and infection will be under control following the comprehensive vaccination programme.

Sex

Diesel Surcharge for short term pay to park / stop and shop parking

The surcharge will augment existing measures to actively discourage vehicles with high emissions and thereby improve air quality and reduce health inequalities. Consultation feedback – most notably in the Muswell Hill town centre area - confirms that residents are concerned at stop and shop parking spaces being occupied by trade vehicles and delivery vans – many of which are diesel-fuelled

Gender Reassignment

There is no evidence or published information to indicate either positive or negative impact on people transitioning gender as a result of the proposed diesel surcharge. The Government Equalities Office estimates there are between 200,000-500,000 transgender people in the UK but Haringey does not hold data on how many people in the borough identify as transgender.

It is anticipated that people with this protected characteristic will not be negatively or differentially affected by the introduction of a diesel surcharge for stop and shop (pay to park) bays

Age

increased charges and permit prices will negatively impact on older drivers who are more likely to have mobility issues, drive older and diesel vehicles, and who rely on those regular family/carers visits which

need to use stop and shop parking bays. However, both older people and young children will benefit from measures designed to discourage high pollutant vehicles and encourage healthier travel modes. The main benefits will be in terms of improved health as a result of better air quality. Haringey's Air Quality Action Plan sets out how older people and younger people are more vulnerable to the effects of air pollution. The Air Quality Action Plan can be accessed here:
<http://www.minutes.haringey.gov.uk/documents/s112468/Appendix%20B%20Haringey%20Final%20AQA%202019-24%2028.10.19.pdf>

Disability

While increased charges will affect those who may have to use older, higher polluting vehicles, this is offset by the fact that motorists with disabilities (including hidden disabilities) can apply for a Blue Badge which will entitle them to a free resident parking permit and this includes free parking in stop and shop bays. Disabled residents who require family and carer visits will be disadvantaged if they need to pay for their carers' parking.

Race and Ethnicity

BAME communities in Haringey are concentrated in areas that have higher than average levels of air pollution. As an indication, the proportion of non-White British communities is 83% in Northumberland Park, compared with 35% in Muswell Hill, and Haringey's Air Quality Action Plan sets out the relative levels of air pollution in these two wards and demonstrates that levels are higher in Northumberland Park. The Air Quality Action Plan can be accessed here:
<http://www.minutes.haringey.gov.uk/documents/s112468/Appendix%20B%20Haringey%20Final%20AQA%202019-24%2028.10.19.pdf>.

Health inequalities are considerably higher amongst Black African and Caribbean groups than in the White population, and poor air quality is linked to multiple respiratory and cardiovascular conditions, which significantly increases the risk of death from Covid-19. It is therefore expected that this group will benefit from this additional measure to discourage high polluting vehicles, as it will improve air quality and reduce exposure to air pollution.

Haringey's Borough Plan EqIA reports that BAME groups are more likely than others to be earning below the London living wage, and to be in receipt of benefits. Groups with lower incomes may be negatively impacted by the increase in parking costs and will be impacted if they need to drive a more polluting car because they will be less able to afford lower polluting or electric vehicles.

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 around 7000 residents. There are no statistics or other evidence to suggest that LGBTQ individuals would be negatively or positively affected by the diesel surcharge on stop and shop parking. Clearly there are disadvantages to all those faced with increased parking charges if they drive high polluting or diesel cars, but there is no disproportionate or differential effect based on this protected characteristic.

Religion and Belief

There is no indication of any adverse or disproportionate impact on faith groups as a result of changes to pricing policy on stop and shop parking bays. As with all residents, pedestrians and cyclists, there will be benefits from improved air quality and fewer polluting vehicles on the streets

Pregnancy and Maternity

Expectant mothers and those caring for young babies will benefit from this measure to cut pollution and parking congestion. Long term exposure to air pollution is associated with low birthweight (which leads to a higher risk of complications and long-term health effects). While expectant mothers may not be able to access all of the opportunities available from this measure designed to reduce polluting car use, they and babies and young children will benefit from improvements in air quality.

Marital status and Civil Partnership

The 2011 Census indicated that Haringey had a higher proportion of couples in a registered same sex civil partnership than England and London. The diesel surcharge for stop and shop parking will not cause adverse or differential impact on people in marriages or civil partnerships.

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 EqlA guidance

Public consultations are conducted regularly in-house on individual projects undertaken by Traffic Management on the introduction of measures. Statutory consultation will be carried out prior to any implementation of the diesel surcharge, should the measure be approved by Cabinet. Consultation reviews are carried out periodically across the borough to assess parking issues and needs and identify what changes or improvements may be needed. Our policy on all highways and parking consultations is to encourage residents and businesses to comment not only on proposed measures but more generally on issues affecting the street scene environment.

Market research studies including Tottenham Quality of Life Survey, Turnpike Lane Shopping Survey and Green Lanes District Scheme Surveys will continue to inform the council of equalities issues and concerns that are important for residents' quality of life.

Future consultations will include analysis of views by protected characteristics as a means of monitoring the introduction of measures defined by the Parking Transformation Programme and actioned by the Parking Action Plan, as well as the ULEZ Readiness programme which initiated consideration of diesel surcharges.

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?

Parking consultation results confirm that residents value the ability offered to park close to home and not have to walk long distances to get to and from their cars especially when carrying heavy shopping or accompanied by small children. The consultations also confirm that residents feel safer walking on roads which are not heavily parked because clearer roads give improved visibility and residents report feeling safer as a result. There is considerable concern at the extent of trade vehicles and online / internet delivery vans occupying both residential and stop and shop parking spaces - to the disadvantage of residents and visitors.

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

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 increases in parking permit costs; however, they will benefit from reduced air pollution. Carers to young

children will be encouraged to take advantage of more sustainable travel options including public transport although we recognise this is not a practical option during the current Covid epidemic

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 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

Younger and older age groups will derive considerable health benefits from less traffic congestion, less pollution, and safer roads. Older people who rely more on car use and may well own older higher polluting diesel vehicles will probably not benefit from any surcharge on stop and shop parking charges although this will be offset by reduced air pollution and by improved availability of parking space

Older people are more likely to be dependent on cars for travel, particularly as they are also more likely to have a disability. The diesel surcharge for stop and shop parking does not aim to eliminate car use but to further encourage use of less polluting vehicles which, as current Covid restrictions have shown, result in much improved air quality with associated health benefits.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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4. Disability

Disabled people will benefit from lower pollution levels, safer streets and reduced parking congestion.

However, charges for visitors and carers using stop and shop parking bays may adversely impact individuals with disabilities who require significant numbers of carer and family visits. Allocated disabled bays and free issue of a resident permit to Blue Badge holders will have some positive impact. The measure will also be monitored through consultations and these consultations will seek to identify any differential impact on individuals with disabilities.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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5. Race and ethnicity

This group are particularly vulnerable to poor air quality due to the overrepresentation of BAME communities in areas in Haringey where pollution levels are high. They will benefit accordingly from improvements in air quality and modal shift. However, those on low incomes, who are more likely to be from BAME communities, who drive higher polluting vehicles will be disadvantaged by increased stop and shop parking charges for higher polluting diesel vehicles.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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6. Sexual orientation

It is anticipated that the impact of the diesel surcharge measure 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)

It is anticipated that faith and religious groups will be overrepresented among those who benefit from improvements in air quality and from parking controls that facilitate access to places of worship.

Positive	X	Negative		Neutral impact		Unknown Impact	
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8. Pregnancy and maternity

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 if they drive diesel cars. However, expectant mothers and mothers up to 6 months after birth will benefit from better air quality, and less congested streets. Overall the measure is expected to have a positive impact on this group.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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9. Marriage and 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

Older BAME people may be more impacted by the diesel surcharge and increased prices for visitor and stop and shop parking, but it is worth noting that they will also benefit more from lower air pollution. Younger BAME people in the areas of the Borough with higher levels of air pollution will benefit more from reduced air pollution.

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 relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant 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 relevant protected characteristic and those who do not?

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

The diesel surcharge and wider related measures set out in the ULEZ Readiness programme are designed to bring benefits for all residents in Haringey. All residents will benefit from a reduction in traffic congestion and high polluting vehicles; improved health from improved air quality; and safer streets. These are seen as mitigating against the impact of increased parking charges which do impact on low income groups. The diesel surcharge measure therefore represents an additional step towards addressing health inequalities affecting groups who share the protected characteristics.

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

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.	Y
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality.	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
Reducing the reliance on the private car (resulting from surcharges for polluting vehicles will affect older people and older BAME residents, and women who are more likely to rely on cars	Provide options for choosing more sustainable modes of transport and also use public consultations to collect views from those who do need to use cars to identify any problems	Head of Operations	Ongoing
Surcharges for higher polluting vehicles and extension of parking charges can impact adversely on those who rely on regular visits from family and from carers, especially if they have to buy larger numbers of visitor permits	The needs of those affected will be addressed in further consultations and reviews on the operation of parking controls. Dates of consultations will be defined and agreed by the Head of Service who will also require that Consultations include provision for these requirements	Head of Operations	Ongoing

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 feedback from residents, consultations, ward councillors and other representative groups.

7. Authorisation

EqIA approved by
(Assistant Director/ Director)

Date
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8. Publication

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

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