

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	Introduction of Sunday parking charges in car parks and in stop and shop parking bays
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*

Introduction of Sunday parking charges in car parks and in stop and shop parking bays

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 modal transport shift away from private cars is impractical during the current Covid epidemic (because private cars are safer because of reduced transmission risk), the introduction of Sunday parking charges in car parks and in pay to park (stop and shop) locations would not come into 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. Even during current Covid restrictions we would expect the introduction of Sunday parking charges (and associated enforcement) to have net positive impact for those using town centre shops and services.

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

- Introduction of Sunday charges in and in Car Parks and in Stop and Shop (previously known as 'Pay & Display) parking facilities in Haringey's town centre shopping and leisure / services areas.

This will regulate parking and improve availability of parking spaces. This proposal also supports the delivery of our transport and air quality action plan objectives. It is clear from consultations, and parking surveys in Green Lanes, Muswell Hill, and from the recent Turnpike Lane Customer Survey that extensive parking space in and around town centre shopping areas is taken up by trade vans and other vehicles used by shop owners and managers, and by shop staff. This occurs on Sundays as well as weekdays but is more of a problem on Sundays when there are no parking controls or charges in place.

At present we do not have clear information (positive or negative) about the impact of Sunday Car Park charges on people attending places of religion/worship. We need more information on this and we will therefore use the Statutory Consultation to contact churches and places of worship across the borough in order to have clarity on advantages or disadvantages of Sunday charges in car parks.

The introduction of Sunday parking charges is generally needed to respond to changing patterns of behaviour within the town centres on Sundays and to cater for increased demands for parking which in some instances can be as high on a Sunday as it is on weekdays. Not only will it help residents and others who want to visit our town centre shopping areas by helping ensure regular turnover of valuable parking locations improving accessibility for some people, but will also help deal with the problem of vans and cars left parked over the weekends when charges don't apply. Any absence of parking charges and enforcement tends to attract extraneous parking which does not help either residents or businesses.

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 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 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 car parks and stop & shop (previously known as 'Pay & Display) are owned by non-residents as well as by Haringey residents and businesses. However, in terms of equalities impact assessment, 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. 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 on streets and in car parks

Impact on Service Users / Inequalities Identified

While all travel is strongly discouraged during the current Covid restrictions, the proposed Sunday charges are 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

Introduction of Sunday parking charges in car parks and in stop and shop parking bays

The charges will work in conjunction with other related measures to discourage vehicles with high emissions and thereby improve air quality and reduce health inequalities. Survey feedback, as mentioned in the introduction above, confirms that many residents and visitors are concerned at stop and shop parking spaces being taken up by trade vehicles and delivery vans.

Gender Reassignment

Introduction of Sunday parking charges in car parks and in stop and shop parking bays

There is no evidence or published information to indicate either positive or negative impact on people transitioning gender as a result of the proposed measure. 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 Sunday charges for stop and shop (pay to park) or car park bays

Age

Introduction of Sunday parking charges in car parks and in stop and shop parking bays

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 need to drive to local shops and services. However, both older people and young children will benefit from measures designed to ensure that there is good availability of parking space. There will be additional benefits 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

Introduction of Sunday parking charges in car parks and in stop and shop parking bays

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 parking in stop and shop bays. Some disabled residents who require family and carer visits could be disadvantaged if their carers and other visitors need to use car parks or stop and shop pays when visiting on Sundays.

Race and Ethnicity

Introduction of Sunday parking charges in car parks and in stop and shop parking bays

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>. It is therefore expected that this group will benefit from this additional

measure to discourage extraneous parking, 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 if they drive more polluting cars because they will be less able to afford lower polluting or electric vehicles.

Sexual Orientation

Introduction of Sunday parking charges in car parks and in stop and shop parking bays

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 introduction of Sunday parking charges in car parks and stop and shop bays. Clearly there are economic disadvantages to all those faced with increased parking charges, but there is no disproportionate or differential effect based on this protected characteristic.

Religion and Belief

Introduction of Sunday parking charges in car parks and in stop and shop parking bays

There is no clear indication of any adverse or disproportionate impact on faith groups as a result of changes to pricing policy on stop and shop parking bays or in car parks. Improved availability of parking space on Sundays will have positive impact. We need more information on how car park charges could affect those attending places of worship and we will therefore use the Statutory Consultation to contact churches and places of worship across the borough in order to have clarity on impact on this group of Sunday charges in car parks.

Pregnancy and Maternity

Introduction of Sunday parking charges in car parks and in stop and shop parking bays

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, they and babies and young children will benefit from improvements in air quality.

Marital status and Civil Partnership

Introduction of Sunday parking charges in car parks and in stop and shop parking bays

The 2011 Census indicated that Haringey had a higher proportion of couples in a registered same sex civil partnership than England and London. The Sunday charges for stop and shop and car parks 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 EqIA 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 Sunday parking charges, 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 the Turnpike Lane Shopping Survey, Green Lanes District Scheme Surveys and Muswell Hill Town Centre consultation have assisted in informing 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 in the MTFS and other policy instruments

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, shop customers 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 EqIA 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 introduction of Sunday parking charges. However, they will benefit from increased availability and choice of parking space as well as 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 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 and car parks charges although this will be offset 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 Sunday parking charges do not aim to eliminate car use but to discourage extraneous parking and keep more parking spaces available to those who need them.

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, Sunday charges for visitors and carers using car parks and stop and shop parking bays may adversely impact individuals with disabilities who require significant numbers of carer and family visits, but this will be offset by improved parking space availability. Free parking will remain

available to Blue Badge holders. The measure will also be monitored through consultations and these 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 parking availability. However, those on low incomes, who are more likely to be from BAME communities, who drive higher polluting vehicles will be disadvantaged by the introduction of Sunday car park and stop and shop charges.

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

It is anticipated that the impact of the Sunday parking charges 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 charges that facilitate access to places of worship. We do however need more information and we will therefore use the Statutory Consultation to contact churches and places of worship across the borough to have more clarity on the impact of Sunday charges in car parks. It should be noted that for other religions and faiths whose holy days fall on other days of the week when controls and charges apply, no exemptions are granted. The availability of public transport, the concessions offered to disabled drivers, the elderly and the disabled on Transport for London all contribute to mitigating the adverse impacts of Sunday parking charges.

Positive	X	Negative	X	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 by the increased costs. However, expectant mothers and mothers up to 6 months after birth will benefit from better air quality, and less congested streets and car parks. 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 Sunday charges for car parks / 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 introduction of the Sunday parking charges measure is not considered to result in any direct/indirect discrimination for any groups that share the protected characteristics.

The Sunday charges and wider related measures set out in the MTFs and related programmes 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 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	Action	Lead officer	Timescale

characteristics are impacted?			
Reducing the reliance on the private car (resulting from increase parking charges 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
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.