

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	Resident and Business Permits Pricing increase
Service area	Operations
Officer completing assessment	Greville Percival
Equalities/ HR Advisor	Melissa Nalubwama-Mukasa
Cabinet meeting date (if applicable)	April 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*

Proposed Resident Permits Pricing increase

A further development to the Parking permit and Charges (ULEZ Readiness) Report identifies an additional measure designed to provide accessible parking for all users, discourage unnecessary use of private vehicles, and encourage more use of sustainable travel modes. The key measure subject to this EqlA is:

- Resident Permits Pricing: an increase of £30 per annum on existing permit charges for high CO2 emission vehicles.

The Council already operates an emission charging structure and as such this is in line with existing policy. The measure represents an above inflation increase for higher polluting vehicles to support the climate change policy – most noticeably in terms of air quality improvement. The measure proposes an increase of £30 per annum on higher polluting vehicles. Based on current data there are at present approximately 7000 residential and business permits issued to higher polluting vehicles. This figure is likely to reduce as residents and businesses change vehicles and reduce vehicle use encouraged by the extension of the ULEZ programme into Haringey in 2021. Emissions from vehicles are a major contributor to poor air quality and the introduction of this measure will further encourage people to rethink the number, type and use of their cars and vans.

While use of public transport and any non-local travel is discouraged during the current Covid restrictions, the proposed permits price increase 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 vaccination centres, GP surgeries, and pharmacies. Reduced vehicular traffic as a result of Covid restrictions has already shown benefits in terms of improved air quality.

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 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.

Equalities monitoring data is not available for holders of parking permits but based on current permit data there are currently approximately 7000 residential and business permits issued to higher polluting vehicles. Given that residents in any property in a CPZ who keep and use a vehicle are eligible for residential and visitor permits, ward level data from sources such as 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 Government Equalities Office estimates that there are between 200,000-500,000 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). Job Seekers Allowance claimants are the 2nd highest in London. Therefore, some low-income households will struggle with the cost of car ownership if they drive older, higher polluting vehicles due to the financial implications for them of increased permit charges for such vehicles. The Council already operates an emissions charging structure and as such this measure is in line with this strategy.

Impact on Service Users / Inequalities Identified

Sex

Charge increase on the current parking permit CO2 bandings

The surcharge will actively discourage vehicles with high emissions and thereby improve air quality and reduce health inequalities. Consultation feedback confirms that all residents - especially women - feel safer when streets are not crowded with parked vehicles.

Positive impact is expected by discouraging households who operate multiple vehicles from contributing to local air pollution and from taking up excessive parking spaces.

Gender Reassignment

Charge increase on the current parking permit CO2 bandings

There is no evidence or published information to indicate either positive or negative impact on people transitioning gender because of increased permit charges. The Government Equalities Office estimates that 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 not expected that people with this protected characteristic will be negatively or differentially affected by incrementally increased parking charges for higher polluting (CO2) vehicles

Age

Charge increase on the current parking permit CO2 bandings

Increased charges and permit prices will negatively impact on older residents who are more likely to have mobility issues, drive older and diesel vehicles, and who rely on regular family/carer visits and will therefore need to purchase significant quantities of Visitor Permits. However, both older people and

young children will benefit from measures designed to discourage high polluting vehicles and encourage sustainable travel modes. There will be benefits in terms of improved health resulting from 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%20AQAP%202019-24%2028.10.19.pdf>

Disability

Charge increase on the current parking permit CO2 bandings

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 and are entitled to a free resident parking permit.

Race and Ethnicity

Charge increase on the current parking permit CO2 bandings

BAME communities in Haringey are concentrated in areas such as Tottenham and Wood Green which have above average levels of air pollution. For instance, 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%20AQAP%202019-24%2028.10.19.pdf>. It is therefore expected that this group will benefit from the measures to discourage high polluting vehicles, as this will improve air quality and reduce these communities' exposure to 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 and electric vehicles.

Sexual Orientation

Charge increase on the current parking permit CO2 bandings

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 charges. There are disadvantages to all residents faced with increased permit 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

Charge increase on the current parking permit CO2 bandings

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

Pregnancy and Maternity

Charge increase on the current parking permit CO2 bandings

Expectant mothers and those caring for 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 measures designed to reduce car use, they and babies and young children will benefit from improvements in air quality

By reducing the number of high polluting vehicles on streets, this measure will also provide positive impact in terms of improved air quality and healthier streets

Marital status and Civil Partnership

Charge increase on the current parking permit CO2 bandings

The 2011 Census indicated that Haringey had a higher proportion of couples in a registered same sex civil partnership than England and London. Increased parking permit charges will not cause adverse or differential impact on people in marriages or civil partnerships. People in marriages and in civil partnerships will be treated the same in all aspects of the programme.

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 (in-house) are carried out on projects undertaken by Traffic Management including measures such as permit charges and other policy issues. The practice on all highways and parking consultations is to encourage residents and businesses to comment not only on proposed measures but to give their views more generally on issues affecting the street scene environment. The feedback received, is designed to ensure informed and inclusive policy and practice.

Market research studies including Tottenham Quality of Life Survey, Turnpike Lane Shopping Survey and Green Lanes District Scheme Surveys are good examples of how the council prioritises community engagement.

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 and the ULEZ Readiness programme from which the current proposed measure has been developed

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 being able 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.

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 but those who do need to drive will be helped by any reduction in parking congestion resulting from the proposal.

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 will benefit from parking controls which make it easier to park close to home and facilitate visits from family and carers.

Older people are more likely to be dependent on cars for travel, particularly as many also have a disability. Older people may therefore be negatively impacted by reduction in private car use as a result of permit surcharges for higher polluting vehicles.

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, restrictions on visitor permits may adversely impact individuals with disabilities who require a higher than average number of carer and family visits. Allocated disabled bays and free issue of a resident permit to Blue Badge holders have positive impact. The effect of increased permit charges will be monitored through consultations which identify 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 travel shift. However, those on low incomes, who are more likely to be from BAME communities, and those who drive higher polluting vehicles will be disadvantaged by increased permit prices.

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

It is anticipated that the impact of increased permit charges 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 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 by increase in parking permit costs. However, expectant mothers and mothers up to 6 months after birth will benefit from better air quality, and less congested streets. Overall the permit charging measure will 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 increased prices for resident permits, but 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?

Increase prices for parking permit CO2 bandings is not considered to result in any direct/indirect discrimination for any groups that share the protected characteristics.

The measure is designed to bring benefits for all residents in Haringey. All residents will benefit from a reduction in traffic congestion and lower levels of 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 a further 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 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.	Y
Adjust the proposal: the EqlA 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 permit 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
Resident permit 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 large numbers of visitor permits	The needs of those affected will be addressed in further consultations and reviews on the operation of controlled parking zones - specifically including having reduced operating hours in Controlled Parking Zones. Dates of consultations will be defined and agreed by the Head of Service who will also require that Consultations include	Head of Operations	Ongoing

	provision for these requirements		
<p>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.</p>			
N/A			
<p>6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:</p>			
<p>The impact will be monitored through feedback from residents, consultations, ward councillors and other representative groups.</p>			

7. Authorisation	
EqIA approved by (Assistant Director/ Director)	Date
8. Publication	
<i>Please ensure the completed EqIA is published in accordance with the Council's policy.</i>	

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