

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	Visitor Parking. Future charging structure and Visitor vouchers - pricing structure change
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 Mc Donnell, 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*

Visitor Parking. Future charging structure and Visitor vouchers - pricing structure change

It is current policy to charge to parking permits and for that charge to be set at a level that influences take up and encourages the use of sustainable modes of transport and air quality improvement. The measure consists of increasing visitors parking permits tariff by 6% annually - for 5 years. Those proposals support air quality and climate change policies, encouraging a move to more sustainable forms of transport. This measure will make the cost of running a car more expensive when parked on the road in stop and shop (pay-to-park bays and in visitor parking bays in Controlled Parking Zones. This could impact car owners on a low income.

Due to the current COVID restrictions and government guidance we are not encouraging use of public transport during the current Covid restrictions. The pricing structure change is not planned to take effect until late 2021 by which time it is anticipated that Covid transmission and infection will be offset by the comprehensive vaccination programme currently underway. Reduced vehicular traffic as a result of Covid restrictions has confirmed the improved air quality as a result.

Cost increases are not considered that significant when compared to the overall cost of running a vehicle and in considering the benefit of being able to find parking space more easily. Although permit charges will increase, they still represent a small portion of the cost of running a motor vehicle and are good value compared to providing an off-street parking space in a car park or new driveway. Consultations show that residents and their visitors are primarily concerned with having parking spaces readily available and that effective enforcement is carried out to stop extraneous parking.

Key Stakeholders

Key Stakeholders comprise all residents and those who need to use stop and shop 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 will benefit from lower air pollution levels as a result of reduced vehicle traffic.

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.

Equalities monitoring data is not available for holders of parking permits. Data is not captured at the application stage for any permits. However, 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 characteristics.

- **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). 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. By promoting practical alternatives to car travel (safer walking and cycling, more reliable public transport) and having less congested, safer and healthier streets; the measure will help all residents while being of particular benefit to people who are disadvantaged by traffic and parking congestion due to their protected characteristic. These groups include older people, those with disabilities (including hidden disabilities) expectant mothers and young children. While use of public transport is strongly discouraged during the current Covid restrictions, the changes to visitor permit pricing will not be introduced until late 2021 by which time it is anticipated that Covid transmission and infection will be under control following the comprehensive vaccination programme.

Some groups may not be able to fully engage in 'active travel' and will rely on private vehicle use. The introduction of free resident parking permits will benefit disabled badge holders. Furthermore, reduced traffic levels will help those with mobility impairments as well as older people and pregnant women by making it easier to park close to home and when using a car to visit local shopping areas for short stay parking. Many residents complain that current levels of parking demand often make it very difficult when they need to drive out for shopping or appointments, because they often cannot find a parking space on their return.

Impact on Service Users / Inequalities Identified

Sex

Future charging structure and Visitor vouchers - pricing structure change

This proposal will have no apparent benefit or disadvantage to any particular sex. The pricing and charging structure will however further discourage vehicles with high emissions and so improve air quality and reduce health inequalities

Gender Reassignment

Future charging structure and Visitor vouchers - pricing structure change

There is no evidence or published information to indicate either positive or negative impact on people transitioning gender as a result of the proposals in the Report. 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.

Age

Future charging structure and Visitor vouchers - pricing structure change

People of all ages who need to buy visitor parking permits for friends and family visits will be impacted by the increased charges. Those people of working age who drive to work, visit friends and family, and use visitor parking bays where increased charges apply, may be more impacted than other car users.

Retired people may have less disposable income to be able to pay for visitor parking permits, but people aged 65+ will continue to benefit from concessionary discounts on visitors parking charges. Those aged 60 and over continue to qualify for free public transport. Children and young people under the age of 17 who do not drive will not be directly impacted by the proposal.

Disability

Future charging structure and Visitor vouchers - pricing structure change

While increased charges will affect those with older, higher polluting vehicles, this is offset by the fact that motorists with disabilities (including hidden disabilities) can apply for a Blue Badge and will also be entitled to a free resident parking permit. Disabled residents who require family and carer visits will be disadvantaged if they need to buy increased quantities of higher priced visitor permits. Those with a registered disability and have a blue badge will continue to be able to park for free.

Race and Ethnicity

Future charging structure and Visitor vouchers - pricing structure change

BAME communities in Haringey are concentrated in areas that have higher than average levels of air pollution. Greenspace Information for Greater London (GiGL GLA 2014) confirms that all 8 wards in the west of the borough have '100% of homes with good access to green space. Conversely in the central and eastern parts of the borough, West Green, Noel Park, Woodside, and Tottenham Green have less than 50% of homes with good access to nature. It is therefore expected that improved air quality resulting from reduced visitor parking will reduce these communities' exposure to pollution. Groups with lower incomes may be negatively impacted by the increase in visitor parking charges.

Sexual Orientation

Future charging structure and Visitor vouchers - pricing structure change

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 visitor permit charges, but there is no disproportionate or differential effect on this protected characteristic.

Religion and Belief

Future charging structure and Visitor vouchers - pricing structure change

This proposal will have no apparent benefit or disadvantage to any particular religion. There will be positive benefits to all groups from improved air quality and fewer polluting vehicles on the streets

Pregnancy and Maternity

Future charging structure and Visitor vouchers - pricing structure change

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 measures designed to reduce car use, they and babies and young children will benefit from improvements in air quality

Marital status and Civil Partnership

Future charging structure and Visitor vouchers - pricing structure change

The 2011 Census indicated that Haringey had a higher proportion of couples in a registered same sex civil partnership than England and London. This proposal will have no particular impact on marital status and does not treat same sex couples or those in civil partnerships less or more favourably than anyone else.

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 Operations Traffic Management on the introduction of measures in the ULEZ Readiness programme. Consultation reviews are planned across the borough including a full assessment of parking issues and needs in order to identify what changes or improvements may be needed. Reviews will include examining the longer term effects on parking of the covid pandemic. 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 and the feedback received has informed measures in the MTFS and ULEZ Readiness Programme.

Market research studies including Tottenham Quality of Life Survey, Turnpike Lane Shopping Survey and Green Lanes District Schemes are carried out to provide feedback to the council on the practical parking issues and challenges facing residents, businesses, and visitors.

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 and their visitors value the ability offered to park close to shops, services, and to find conveniently located parking facilities when visiting friends or family - especially when carrying heavy shopping or accompanied by small children. National and London policy measures are also in place to discourage extraneous parking and parking by high polluting vehicles. Future consultations will specifically include analysis of views by protected characteristics as a means of monitoring the introduction of this and other measures set out in the MTFS.

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 when it is permitted safe to do so following the comprehensive vaccination programme.

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 age groups will derive considerable health benefits from less traffic congestion, less pollution, and safer roads.

Older people are more likely to be dependent on cars for travel, particularly as they are also more likely to have a disability. While all will benefit from lower traffic pollution and cleaner air, older people may be negatively impacted by reduction in private car use as a result of permit surcharges for older and higher polluting vehicles. The measure does not aim to eliminate car use but to encourage use of less polluting vehicles. Older people who do rely more on car use will be assisted by parking controls which make it easier to park close to shops and services and this will also make it easier for those who rely on regular visits from family and carers.

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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4. Disability

The charging arrangement will have no apparent adverse effect on disabled people. Those with a registered disability and have a blue badge will continue to be able to park for free. However, increased charges for visitor permits may adversely impact individuals with disabilities who require a higher than average number of carer and family visits; although it is anticipated that there will be improved availability of visitor parking space.

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 permit prices.

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

It is anticipated that the impact of ULEZ Readiness measures on people who identify as LGBT 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 the impact of these recommendations on people in this protected group 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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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 visitor parking permit costs. However, expectant mothers and mothers up to 6 months after birth will benefit from better air quality, and less congested streets.

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 permits, 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 ***Future charging structure and Visitor vouchers - pricing structure change*** is not considered to result in any direct/indirect discrimination for any groups that share the protected characteristics.

The proposal is designed to bring benefits for all residents who will benefit from a reduction in traffic congestion and high polluting vehicles; improved health from being enabled to take up active travel options and 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 proposal therefore represents one in a number of measures designed to address health

inequalities affecting groups who share the protected characteristics. It also complies with national measures relating to climate change and air quality.

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 increased charges will affect older people and older BAME residents, and those who are more likely to rely on cars / visitors	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		
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 ongoing consultations and reviews on the operation of stop and shop / pay-to-park parking. Dates of consultations will be defined and agreed by the Head of Service who will also require that Consultations include provision for these requirements		

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

EqlA approved by
(Assistant Director/ Director)

Date
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8. Publication

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

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