

## Equality Impact Assessment (EqIA)

The Equality Impact Assessment (EqIA) form is a template for analysing a policy or proposed decision for its potential effects on individuals with protected characteristics covered by the Equality Act 2010.

The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

### 1. Responsibility for the Equality Impact Assessment

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|--|--|
| <b>Name of proposal:</b>                     | <b>Parking Strategy and<br/>Policy/Charges Review –<br/>feedback to statutory consultation</b> |
| <b>Service Area:</b>                         | <b>Parking Service</b>   |
| <b>Officer Completing Assessment:</b>        | <b>Simon Robertson</b>   |
| <b>Equalities Advisor:</b>                   | <b>Diptasri Basu</b>   |
| <b>Cabinet meeting date (if applicable):</b> | <b>N/A</b>   |
| <b>Director/Assistant Director</b>           | <b>Mark Stevens</b>  |

### 2. Executive summary

The Cabinet Member signing report sets out the results of the statutory consultation regarding several proposed changes to parking policy and parking charges, and seeks approval to proceed with the implementation of a number of those proposals.

Parking policy and charges proposals:

- Concerns a range of parking users who may be impacted by proposed permit changes, across the controlled parking zones
- Policy proposals do not in general have a target population profile, except:

- Populations who have a disability – a proposed new Non-Resident Blue Badge Holder Permit for non-Haringey residents who may work in the borough and would benefit from more flexible parking, with reduced potential for fraud
- Populations who may be more impacted by air pollution – proposed permit charging measures to positively address air pollution through incentives for reduced car use / use of cars with lower emissions
- Results of analysis:
  - New Non-Resident Blue Badge Holder Permit for those who work in the borough
    - Positive – offering a new permit for Blue Badge holders who work in the borough provides additional benefit to such parking users (in terms of flexibility in parking, and potential for reduced fraud), directly positively impacting those with disability and an older profile
  - Updated permit charging structure, to include a new EV charging tier & incremental subsequent permit surcharging for a range of permits:
    - Positive – introducing incentives to further reduce vehicle emissions and thereby address air quality, will positively impact areas which with more prevalent social deprivation, where there is a correlation with poor air quality<sup>1</sup>

### **3. Consultation and engagement**

3a. 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? Detail how your approach will facilitate the inclusion of protected groups likely to be impacted by the decision.

Parking policy and charges proposals form part of the Parking Strategy Delivery Plan, as approved at Cabinet in July 2024. The strategy and associated plan were developed in part following an engagement exercise in early 2024. The Parking Service uses engagement methods which facilitate the inclusion of protected groups where these are known to be impacted by a particular service or proposal. Parking has a particular importance for residents and other users who have mobility issues, where easy access to a home or other facility is key. The Parking Service has an established group of organisations and key contacts for such service users, with close engagement taking place early in policy development and service design.

These key contacts and groups were invited to engage with an informal consultation which took place in early 2024 concerning parking policy. In addition to the generic communications undertaken to engage people in the consultation, targeted communications were made to these groups to alert them to the consultation and

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<sup>1</sup> [Haringey Air Quality Action Plan 2019-2024](#)

ensure they responded with concerns and interests in the consultation process. The online consultation allowed responses from individuals and representatives of groups, such as those representing service users with mobility requirements who may be particularly impacted by parking policy.

3b. 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

Parking policy consultation undertaken in early 2024 sought views on a wide range of parking policy issues, and response data can be taken forward and support various aspects of service development – supporting further objectives of the Parking Strategy where appropriate. Initial parking policy and permit charge updates subject to statutory consultation use aspects of the consultation feedback to support continuing and extending established permit charge principles – including emissions based charging, and surcharges for higher numbers of vehicles per household / address.

## 4. Data and Impact Analysis

**Note:** officers may want to complement their analysis with data from the State of the Borough and ward profiles, found here: <https://www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough>.

**Please consider how the proposed change will affect people with protected characteristics.**

### 4a. Age

#### Data

#### Borough Profile<sup>2</sup>

- 54,422: 0-17 (21%)
- 71,660: 18-34 (27%)
- 63,930: 35-49 (24%)
- 46,516: 50-64 (18%)
- 27,706: 65+ (10%)

#### Target Population Profile

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' age, therefore detailed impact analysis is not possible.

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<sup>2</sup> Census, 2021 – [Population and household estimates, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/population-and-household-estimates)

## Potential Impacts

- Updated permit charging structure, to include a new EV charging tier
  - Neutral – strategic objectives are focus primarily on drivers, and therefore impact those 18+, however also detailed is the role of parking in supporting an effective transport network – which has a wider population
- New permit vehicle size surcharging for a range of permits
  - Neutral – strategic objectives are focus primarily on drivers, and therefore impact those 18+, however also detailed is the role of parking in supporting an effective transport network – which has a wider population
- New Non-Resident Blue Badge Holder Permit for those who work in the borough
  - Positive – offering a new permit for Blue Badge holders who work in the borough provides additional benefit to such parking users (in terms of flexibility in parking, and potential for reduced fraud), the impact of which may be weighted towards older profile
- Other proposals:
  - Neutral impact – no data to suggest this group would be disproportionately impacted

## 4b. Disability

### Data

#### Borough Profile

- Disabled under Equality Act – 13.7%<sup>3</sup>
  - Day to day activities limited a lot – 6.1%
  - Day to day activities limited a little – 7.5%
- 7.5% of residents people diagnosed with depression<sup>4</sup>
- 1.7% of residents diagnosed with a severe mental illness<sup>5</sup>
- 0.4% of people in Haringey have a learning disability<sup>6</sup>

#### Target Population Profile

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile – except where noted below with

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<sup>3</sup> Census, 2021 – [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk/people-and-population/disability)

<sup>4</sup> NHS Quality Outcomes Framework – [Prevalence of diagnosed depression among GP registered population age 18+](https://www.nhs.uk/quality-outcomes-framework/prevalence-of-diagnosed-depression-among-gp-registered-population-age-18-plus)

<sup>5</sup> NHS Quality Outcomes Framework – [Prevalence of diagnosed mental health diagnosis among GP registered population age 18+](https://www.nhs.uk/quality-outcomes-framework/prevalence-of-diagnosed-mental-health-diagnosis-among-gp-registered-population-age-18-plus)

<sup>6</sup> PHE Learning disability profiles – <https://fingertips.phe.org.uk/learning-disabilities#page/0/gid/1938132702/pat/6/par/E12000007/ati/102/are/E09000014>

regard to Blue Badge holders. Furthermore, data is not held on parking users / parking permit holders' disability, therefore detailed impact analysis is not possible.

Blue Badge holders: specific measures concern Blue Badge holders, and while holding a Blue Badge is not a direct corollary for disability, holders will by definition have a condition which justifies prioritised parking access due to a health or mobility issue. Therefore, holders are considered a target population for the purposes of related policy proposals:

- Blue Badge holders<sup>7 8</sup>
  - London average 3.1% of the population
  - Haringey 3.4% population)

### **Potential Impacts**

- New Non-Resident Blue Badge Holder Permit for those who work in the borough
  - Positive – offering a new permit for Blue Badge holders who work in the borough provides additional benefit to such parking users (in terms of flexibility in parking, and potential for reduced fraud), directly positively impacting those with disability
- Other proposals:
  - Neutral impact – no data to suggest this group would be disproportionately impacted

## **4c. Gender Reassignment**

### **Data**

#### **Borough Profile<sup>9</sup>**

- Gender Identity different from sex registered at birth but no specific identity given – 0.5%
- Trans woman – 0.1%
- Trans man - 0.1%

### **Target Population Profile**

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' gender profile, therefore detailed impact analysis is not possible.

### **Potential Impacts**

- All proposals:

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<sup>7</sup> [DfT Valid Blue Badges issued and held by category by region and local authority in England](#)

<sup>8</sup> [ONS Estimates of the population for the UK](#)

<sup>9</sup> Census, 2021 – [Gender identity, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

- Neutral impact – no data to suggest this group would be disproportionately impacted

#### 4d. Marriage and Civil Partnership

**Note:** Only the first part of the equality duty (“*Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act*”) applies to this protected characteristic.

##### Data

##### Borough Profile <sup>10</sup>

- Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (9.9%)
- Married or registered civil partnership: (35.8%)
- Separated (but still legally married or still legally in a same-sex civil partnership): (2.9%%)
- Single (never married or never registered a same-sex civil partnership): (45.3%)
- Widowed or surviving partner from a same-sex civil partnership: (6.1%)

##### Target Population Profile

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders’ marital or civil partnership status, therefore detailed impact analysis is not possible.

##### Potential Impacts

- All proposals:
  - Neutral impact – no data to suggest this group would be disproportionately impacted

#### 4e. Pregnancy and Maternity

##### **Note<sup>11</sup>:**

- Pregnancy is the condition of being pregnant or expecting a baby.
- Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

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<sup>10</sup> Census, 2021 – [Marriage and civil partnership status in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/relationshipsandmarriage/articles/marriageandcivilpartnershipstatusinenglandandwales/2021)

<sup>11</sup> Equality and Human Rights Commission, 2022 – [Pregnancy and maternity discrimination](https://www.equalityhumanrights.com/en/pregnancy-and-maternity-discrimination).

## Data

### Borough Profile <sup>12</sup>

Live Births in Haringey 2021: 3,376

### Target Population Profile

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' pregnancy or maternity status, therefore detailed impact analysis is not possible.

### Potential Impacts

- All proposals:
  - Neutral impact – no data to suggest this group would be disproportionately impacted

## 4f. Race

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.<sup>13</sup>

## Data

### Borough Profile <sup>14</sup>

#### Arab: 1.0%

- Any other ethnic group: 8.7%

#### Asian: 8.7%

- Bangladeshi: 1.8%
- Chinese: 1.5%
- Indian: 2.2%
- Pakistani: 0.8%
- Other Asian: 2.4%

#### Black: 17.6%

- African: 9.4%
- Caribbean: 6.2%
- Other Black: 2.0%

#### Mixed: 7.0%

- White and Asian: 1.5%

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<sup>12</sup> Births by Borough (ONS)

<sup>13</sup> [Race discrimination | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://equalityhumanrights.com/)

<sup>14</sup> Census 2021 - [Ethnic group, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

- White and Black African: 1.0%
- White and Black Caribbean: 2.0%
- Other Mixed: 2.5%

**White: 57.0% in total**

- English/Welsh/Scottish/Northern Irish/British: 31.9%
- Irish: 2.2%
- Gypsy or Irish Traveller: 0.1%
- Roma: 0.8%
- Other White: 22.1%

### **Target Population Profile**

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' ethnicity, therefore detailed impact analysis is not possible.

### **Potential Impacts**

- Updated permit charging structure, to include a new EV charging tier:
  - Positive – introducing incentives to further reduce vehicle emissions and thereby address air quality, will positively impact areas with more prevalent social deprivation, where there is a correlation with poor air quality<sup>15</sup> and where there is an alignment with higher proportion of non-white residents<sup>16</sup>
- Incremental subsequent permit surcharging for a range of permits
  - Positive – introducing incentives to further reduce vehicle numbers and thereby address air quality through reduced emissions, will positively impact areas which with more prevalent social deprivation, where there is a correlation with poor air quality<sup>17</sup> and where there is an alignment with higher proportion of non-white residents<sup>18</sup>
- Other proposals:
  - Neutral impact – no data to suggest this group would be disproportionately impacted.

## **4g. Religion or belief**

### **Data**

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<sup>15</sup> [Haringey Air Quality Action Plan 2019-2024](#)

<sup>16</sup> [Haringey Local Implementation Plan \(LIP3\)](#)

<sup>17</sup> [Haringey Air Quality Action Plan 2019-2024](#)

<sup>18</sup> [Haringey Local Implementation Plan \(LIP3\)](#)



### **Borough Profile <sup>19</sup>**

- Christian: 39%
- Buddhist: 0.9%
- Hindu: 1.3%
- Jewish: 3.6%
- Muslim: 12.6%
- No religion: 31.6%
- Other religion: 2.3%
- Religion not stated: 8.0%
- Sikh: 0.3%

### **Target Population Profile**

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' religions or beliefs, therefore detailed impact analysis is not possible.

### **Potential Impacts**

- All proposals:
  - Unknown impact – no data to suggest this group would be disproportionately impacted

## **4h. Sex**

### **Data**

#### **Borough profile <sup>20</sup>**

- Females: (51.8%)
- Males: (48.2%)

### **Target Population Profile**

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' sex, therefore detailed impact analysis is not possible.

### **Potential Impacts**

- All proposals:

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<sup>19</sup> Census, 2021 – [Religion, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/religiousandethnicgroups/articles/religion-england-and-wales-2021)

<sup>20</sup> Census 2021 – [Gender identity: age and sex, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicity/articles/gender-identity-age-and-sex-england-and-wales-2021)

- Neutral impact – no data to suggest this group would be disproportionately impacted

## 4i. Sexual Orientation

### Data

#### Borough profile <sup>21</sup>

- Straight or heterosexual: 83.4%
- Gay or Lesbian: 2.7%
- Bisexual: 2.1%
- All other sexual orientations: 0.8%
- Not answered: 11.0%

### Target Population Profile

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' sexual orientation, therefore detailed impact analysis is not possible.

### Potential Impacts

- All proposals:
  - Neutral impact – no data to suggest this group would be disproportionately impacted

## 4j. Socioeconomic Status

### Data

#### Borough profile

#### Income

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023<sup>22</sup>
- 19.6% of residents were claiming Universal Credit as of March 2023<sup>23</sup>
- 29.3% of jobs in Haringey are paid below the London Living Wage<sup>24</sup>

### Area Deprivation

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<sup>21</sup> Census, 2021 – [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/sexualorientationandgender/articles/sexualorientationandgenderinenglandandwales/2021)

<sup>22</sup> ONS – [ONS Claimant Count](https://www.ons.gov.uk/peoplepopulationandcommunity/employmentandunemployment/articles/claimantcount/2023)

<sup>23</sup> DWP, StatXplore – [Universal Credit statistics, 29 April 2013 to 9 March 2023 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/universal-credit-statistics)

<sup>24</sup> ONS – [Annual Survey of Hours and Earnings \(ASHE\) - Estimates of the number and proportion of employee jobs with hourly pay below the living wage, by work geography, local authority and parliamentary constituency, UK, April 2017 and April 2018 - Office for National Statistics](https://www.ons.gov.uk/peoplepopulationandcommunity/employmentandunemployment/articles/annualsurveyofhoursandearnings/ashe/estimatesofthenumberandproportionofemployeejobswithhourlypaybelowthelivingwagebyworkgeographylocalauthorityandparliamentaryconstituencyukapril2017andapril2018)

Haringey is the 4<sup>th</sup> most deprived in London as measured by the IMD score 2019. The most deprived LSOAs (Lower Super Output Areas, or small neighbourhood areas) are more heavily concentrated in the east of the borough, where more than half of the LSOAs fall into the 20% most deprived in the country.<sup>25</sup>

### **Target Population Profile**

Parking policy proposals concern the borough as a whole or, in the case of parking permit proposals, for all controlled parking zone areas. Given this, there is no target population profile distinct from the borough profile. Furthermore, data is not held on parking users / parking permit holders' socioeconomic status, therefore detailed impact analysis is not possible.

### **Potential Impacts**

- Updated permit charging structure, to include a new EV charging tier:
  - Positive – introducing incentives to further reduce vehicle emissions and thereby address air quality, will positively impact areas which with more prevalent social deprivation, where there is a correlation with poor air quality<sup>26</sup>
- Incremental subsequent permit surcharging for a range of permits
  - Positive – introducing incentives to further reduce vehicle numbers and thereby address air quality through reduced emissions, will positively impact areas which with more prevalent social deprivation, where there is a correlation with poor air quality<sup>27</sup>
- Other proposals:
  - Unknown impact – no data to suggest this group would be disproportionately impacted

## **5. Key Impacts Summary**

### **5a. Outline the key findings of your data analysis.**

The proposals are not going to result in any direct/indirect discrimination for any group that shares the relevant protected characteristics.

The proposals include measures to meet the specific parking needs of relevant protected groups such as pregnant women and young children, older / disabled people and those with long-term limiting illnesses/conditions.

It is not anticipated that the proposals will have an impact on good community relations.

### **5b. Intersectionality**

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<sup>25</sup> IMD 2019 – [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019)

<sup>26</sup> [Haringey Air Quality Action Plan 2019-2024](#)

<sup>27</sup> [Haringey Air Quality Action Plan 2019-2024](#)

As noted in section 4, data is not held on parking permit holders' protected characteristics, therefore detailed impact analysis – including that to consider intersectionality – is not possible for specific permit policy proposals.

In this context, parking policy proposals are expected to have an overall positive impact, focusing on particular groups for whom parking supports their mobility needs. This intersects in particular older age profiles and Blue Badge holders, who have health concerns or a disability profile.

### **5c. Data Gaps**

Based on your data are there any relevant groups who have not yet been consulted or engaged? Please explain how you will address this

Parking has a particular importance for residents and other users who have mobility issues, where easy access to a home or other facility is key. The Parking Service has an established group of organisations and key contacts for such service users, with close engagement taking place early in policy development and service design. Parking policy consultation undertaken in early 2024 sought views on a wide range of parking policy issues, and these key contacts and groups were invited to engage with the consultation.

## **6. Overall impact of the policy for the Public Sector Equality Duty**

The proposals are not going to result in any direct/indirect discrimination for any group that shares the relevant protected characteristics.

Parking policy proposals seek to advance positive impacts for identified groups: firstly, those of younger and older age profiles, and those in areas with higher social deprivation, where there is a correlation with or who suffer most from poor air quality; secondly, Blue Badge holders who will benefit from improved parking permit offers, with improved flexibility and reduced potential for reduced fraud; thirdly, in strategic objectives to deliver improved parking and enforcement for community and religious events across the borough.

It is not anticipated that the proposals will have an impact on good community relations.

## **7. Amendments and mitigations**

### **7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?**

**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. Policy proposals seek to further promote existing established charging principles, supporting air quality improvements, which positively impact in particular older and younger age profiles.

## **7. Ongoing monitoring**

Proposals for permit policy take forward established charging principles, and where appropriate equalities impact screening will be included as part of permitting fees and charges annual review.

### **Date of EqlA monitoring review:**

In line with specific parking programmes of work.

## **8. Authorisation**

EqlA approved by (Assistant Director/ Director) **Mark Stevens, Assistant Director of Resident Experience**

Date **22<sup>nd</sup> of January 2025**

## **9. 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 EQIA process.