

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

Name of proposal:	Air Quality Action Plan 2025-2030.
Service Area:	Environment & Resident Experience.
Officer Completing Assessment:	Edward Ritchie
Equalities Advisor:	Guy Latham.
Cabinet meeting date (if applicable	e): 22 April 2025
Director/Assistant Director	Barry Francis / Zoe Robertson.

2. Executive summary

Please complete this section *after* completing the rest of the form and summarise:

- The policy proposal, its aims and objectives, the decision in consideration. Please focus on **the change** that will result from this decision.
- Results of the analysis: potential positive and negative equality impacts
- Mitigations that will be taken to minimise negative equality impacts (if relevant)
- Next steps (this may include: if/when the EQIA will be refreshed, planned consultation, future stages of the project).

Cabinet are being asked for permission to consult on the Draft Air Quality Action Plan 2025-30, which outlines 22 measures highlighting how Haringey will effectively use local levers to tackle air quality issues within its control and lead by example. The 22 measures outlined in the action plan can be considered under seven broad topics:



- 1. **Monitoring and other core statutory duties:** maintaining monitoring networks is critical for understanding where pollution is most acute, and what measures are effective to reduce pollution. There are also a number of other very important statutory duties undertaken by boroughs, which form the basis of action to improve pollution.
- 2. Emissions from developments and buildings: emissions from buildings account for about 15% of the Nitrogen Oxides (NOX) emissions across London so are important in affecting Nitrogen Dioxide (NO2) concentrations.
- 3. **Public health and awareness raising:** increasing awareness can drive behavioural change to lower emissions as well as to reduce exposure to air pollution.
- 4. **Delivery servicing and freight:** vehicles delivering goods and services are usually light and heavy-duty diesel-fuelled vehicles with high primary NO2 emissions.
- 5. **Borough fleet actions:** our fleet includes light and heavy-duty diesel-fuelled vehicles such as mini buses and refuse collection vehicles with high primary NO2 emissions. By tackling our own fleet means we will be leading by example.
- 6. Localised solutions: these seek to improve the environment of neighbourhoods through a combination of measures.
- 7. **Cleaner transport:** road transport is the main source of air pollution in London. We need to incentivise a change to walking, cycling and ultra-low emission vehicles (such as electric) as far as possible.

We propose to consult with residents for a period of 6 weeks during Summer 2025. The consultation will involve public exhibitions, the use of social media including twitter, a Common Place website with accessible formats and information.

This Air Quality Action Plan and the measures detailed within would apply to all individuals within the borough, with improved air quality anticipated to positively impact all protected characteristics Groups most affected by or vulnerable to poor air quality will particularly benefit, such as older people, children, disabled people, people from ethnic minority backgrounds and people from socioeconomically deprived backgrounds. Where potential negative impacts have been anticipated as a result of specific measures within the action plan (e.g. traffic calming measures), scheme



specific EQIAs will be undertaken. The public consultation will be used identify any further impacts which are specific to one or more protected characteristic.

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.

Public consultation on the Draft Air Quality Action Plan will take place the Summer 2025. The consultation will involve public exhibitions, the use of social media including twitter, a Common Place website with accessible formats and information.

The needs of protected groups will be considered when deciding how to consult:

- The time and location of the public exhibitions will be chosen so as not to exclude any group
- Accessible locations will be chosen in different parts of the borough and chosen because they are frequently used, particularly by school children, parents and older people. The timing of exhibitions will allow for those who work or have childcare commitments the opportunity to attend
- Exhibition boards will be designed to summarise the key points of the action plan to assist the visually impaired or those who have difficulty reading. Officers will be on hand to explain the action plan and to take note of any comments received.
- The council will send out emails to notify a range of stakeholders including schools, neighbouring boroughs, community groups including groups representing the elderly, resident association, and religious groups.
- For those who do not have access to the internet, copies of the strategy will be placed in all public buildings such as libraries
- Responses to the consultation will be recorded and accepted via Common Place, post, and at public exhibitions.

Consultation will provide residents with an opportunity to inform the council about the particular impacts on protected groups. The findings of the consultation will inform the final version of the AQAP

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

Section to be completed following public consultation

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: <u>https://www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough</u>.

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

4a. Age Data

Borough Profile¹

- 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

- 0-17 (21%)
- 18-34 (27%)
- 35-49 (24%)
- 50-64 (18%)
- 65+ (10%)

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Data sources include:

- Haringey JSNA
- 2011 Census ONS
- Haringey State of the Borough December 2024
- Chief Medical Officer's Annual Report 2022

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal as a result of a need related to their protected characteristic?

¹ Census, 2021 – <u>Population and household estimates, England and Wales - Office for National</u> <u>Statistics (ons.gov.uk)</u>



This Air Quality Action Plan and the measures detailed within would apply to all individuals within the borough; therefore, there is no overrepresentation of any age group compared with the wider borough profile.

<u>Age – Children</u>

Haringey has a relatively young population with 21% of the population being 17 or under, 48% aged between 0-34 and only 10% being 65 and over. Air pollution disproportionately affects the young with studies showing that exposure to high concentrations of air pollution can increase the risks of:

- Slower development of lung function
- Developing asthma during childhood or as an adult
- Wheezing / coughing
- Lung cancers
- Lung infections

The action plan will have a positive impact on this group by reducing pollution sources and pollution exposure, this group will also receive health benefits from the increased focus on active travel and public transport options. The Council will use the public consultation to support the identification of any potential impact.

<u>Age – Older People</u>

10% of Haringey's population is 65 and over. Air pollution disproportionately affects the elderly, particularly if they have pre-existing underlying heart and lung conditions. Exposure to high concentrations of air pollution can increase the risks of:

- Accelerated decline in lung function
- Lung cancer
- Dementia
- Cardio-vascular disease
- Developing Asthma

While the plan will have a positive impact on this group by reducing pollution sources and pollution exposure, this group may be disproportionately affected by some of the proposals set out in the action plan (i.e. traffic calming measures), as many elderly people rely on using personal vehicles to move around the borough. This impact will be reduced and/or mitigated by additional scheme specific EQIAs being undertaken as required. The Council will use the public consultation to support the identification of any potential impact.

Potential Impacts

• Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).



Children and older people are particularly vulnerable to poor air quality and will benefit from improved air quality and reduced exposure to air pollution.



4b. Disability

Data

Borough Profile

- Disabled under Equality Act 13.7%²
 - $\circ~$ Day to day activities limited a lot 6.1%
 - \circ Day to day activities limited a little 7.5%
- 7.5% of residents people diagnosed with depression³
- 1.7% of residents diagnosed with a severe mental illness⁴
- 0.4% of people in Haringey have a learning disability⁵

Target Population Profile

- Disabled under Equality Act 13.7%
 - \circ Day to day activities limited a lot 6.1%
 - \circ Day to day activities limited a little 7.5%
- 7.5% of residents people diagnosed with depression
- 1.7% of residents diagnosed with a severe mental illness
- 0.4% of people in Haringey have a learning disability

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Data sources include:

- Haringey JSNA
- 2011 Census ONS
- Haringey State of the Borough December 2024
- Resident's Survey 2021
- Chief Medical Officer's Annual Report 2022

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

This Air Quality Action Plan and the measures detailed within would apply to all individuals within the borough; therefore, there is no overrepresentation of disabled people compared with the wider borough profile.

² Census, 2021 – <u>Disability, England and Wales - Office for National Statistics (ons.gov.uk)</u>

³ NHS Quality Outcomes Framework – <u>Prevalence of diagnosed depression among GP registered population age</u> 18+

⁴ NHS Quality Outcomes Framework – <u>Prevalence of diagnosed mental health diagnosis among GP registered</u> population age 18+

⁵ PHE Learning disability profiles – <u>https://fingertips.phe.org.uk/learning-</u> disabilities#page/0/gid/1938132702/pat/6/par/E12000007/ati/102/are/E09000014



Census Data shows that 14% of Haringey residents have a long-term health problem that limits their day-to-day activities to various degrees. Reducing toxic pollutants such as NO₂, PM₁₀ & PM_{2.5} will benefit people with pre-existing health conditions. While the plan will have a positive impact on this group by reducing pollution sources and pollution exposure, this group may be disproportionately affected by some of the proposals set out in the action plan (i.e. traffic calming measures), as many disabled people rely on personal vehicles to move around the borough and/or carers using their vehicles to provide essential care and assistance. This impact will be reduced and/or mitigated by additional scheme specific EQIAs being undertaken as required. The Council will use the public consultation to support the identification of any potential impact.

Potential Impacts

• Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The air quality action plan will have a positive impact on disabled people, particularly those with pre-existing health conditions such as asthma and chronic obstructive pulmonary disease by improving air quality and reducing exposure to pollution.

4c. Gender Reassignment

Data

Borough Profile⁶

- 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

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

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Data sources include:

- Haringey JSNA
- 2011 Census ONS
- Haringey State of the Borough December 2024
- Resident's Survey 2021

Detail the findings of the data.

⁶ Census, 2021 – <u>Gender identity, England and Wales - Office for National Statistics (ons.gov.uk)</u>



- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

This Air Quality Action Plan and the measures detailed within would apply to all individuals within the borough; therefore, there is no overrepresentation of any gender identity compared with the wider borough profile.

In Haringey, 0.5% of residents have a gender identity different from their sex registered at birth. Reducing toxic pollutants such as NO₂, PM₁₀ & PM_{2.5} and reducing exposure to poor air quality will benefit all residents in the borough. It is anticipated that people with this protected characteristic will not be disproportionately impacted by this policy and have no specific needs relating to this characteristic. The Council will use the public consultation to support the identification of any potential impact.

Potential Impacts

• Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The air quality action plan will have a positive impact on those who have undergone or undergoing gender re-assignment by improving air quality and reducing exposure to pollution.

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 ⁷

- 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

⁷ Census, 2021 – <u>Marriage and civil partnership status in England and Wales - Office for National Statistics</u> (ons.gov.uk)



- 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%)

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Data sources include:

- Haringey JSNA
- 2011 Census ONS
- Haringey State of the Borough December 2024
- Resident's Survey 2021

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

This Air Quality Action Plan and the measures detailed within would apply to all individuals within the borough; therefore, there is no overrepresentation of any marital or civil partnership status compared with the wider borough profile.

Reducing toxic pollutants such as NO₂, PM₁₀ & PM_{2.5} and reducing exposure to poor air quality will benefit all residents in the borough. It is anticipated that people with this protected characteristic will not be disproportionately impacted by this policy and have no specific needs relating to this characteristic. The Council will use the public consultation to support the identification of any potential impact.

Potential Impacts

• Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The air quality action plan will have a positive impact on residents irrespective of their marital or civil partnership status, by improving air quality and reducing exposure to pollution.

4e. Pregnancy and Maternity



Note⁸:

- 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.

Data

Borough Profile ⁹

• Live Births in Haringey 2021: 3,376

Target Population Profile

• Live Births in Haringey 2021: 3,376

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Data sources include:

- Haringey JSNA
- 2011 Census ONS
- Haringey State of the Borough December 2024
- Resident's Survey 2021
- Chief Medical Officer's Annual Report 2022
- Global Burden of Disease Study 2019

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

This Air Quality Action Plan and the measures detailed within would apply to all individuals within the borough; therefore, there is no overrepresentation of this protected class compared with the wider borough profile.

There is evidence that air pollution may disproportionately affect people's health before they are born. A study by the Global Burden of Disease highlights the effect of ambient and household PM_{2.5} on perinatal outcomes, estimated that low birth weight and over 5.9 million pre-term birth infants worldwide could be attributable to PM_{2.5} air pollution exposure during pregnancy.

⁸ Equality and Human Rights Commission, 2022 – <u>Pregnancy and maternity discrimination</u>.

⁹ Births by Borough (ONS)



Women in Haringey who are pregnant or are caring for young babies will also fall into other vulnerable groups and groups with protected characteristics.

Reducing toxic pollutants such as NO₂, PM₁₀ & PM_{2.5} and reducing exposure to poor air quality will benefit all residents in the borough. It is anticipated that people with this protected characteristic will not be disproportionately impacted by this policy and have no specific needs relating to this characteristic. The Council will use the public consultation to support the identification of any potential impact.

Potential Impacts

• Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The air quality action plan will have a positive impact on those who are pregnant by improving air quality and reducing exposure to pollution.

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.¹⁰

Data

Borough Profile ¹¹

<u>Arab: 1.0%</u>

• Any other ethnic group: 8.7%

<u>Asian: 8.7%</u>

- 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%

<u>Mixed:</u>**7.0%**

- White and Asian: 1.5%
- White and Black African:1.0%
- White and Black Caribbean: 2.0%

¹⁰ Race discrimination | Equality and Human Rights Commission (equalityhumanrights.com)

¹¹ Census 2021 - Ethnic group, England and Wales - Office for National Statistics (ons.gov.uk)



• Other Mixed: 2.5%

White: 57.0% in total

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

Target Population Profile

<u>Arab: 1.0%</u>

• Any other ethnic group: 8.7%

<u>Asian: 8.7%</u>

- 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%

<u>Mixed:</u>**7.0%**

- White and Asian: 1.5%
- White and Black African:1.0%
- White and Black Caribbean: 2.0%
- Other Mixed: 2.5%

White: 57.0% in total

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

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Data sources include:



- Haringey JSNA
- 2011 Census ONS
- Haringey State of the Borough December 2024
- Resident's Survey 2021

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

This Air Quality Action Plan and the measures detailed within would apply to all individuals within the borough; therefore, there is no overrepresentation of this protected class compared with the wider borough profile.

Haringey is the 5th most ethnically diverse borough in the country, with 64% of its residents coming from non-white British communities. 29.7% of Haringey residents do not speak English as their main language. This is the 6th highest rate in London and is above the statistical neighbour and London averages. 180+ languages are spoken. This vibrant mix of cultures contribute to the rich tapestry of life in the area.

Haringey is ranked 49 out of the 317 local authorities in England with respect to deprivation and is the 4th most deprived in London. The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough, including Northumberland Park, Bruce Grove, Tottenham Hale, and Seven Sisters. By comparison, in the west a very small proportion of LSOAs fall into that category, and in the westernmost wards – Highgate, Fortis Green, Muswell Hill, Alexandra and Crouch End – there are none.

Non-White British communities are concentrated in deprived areas, studies have shown that there is a strong correlation between deprivation and pollution. Homes and residences in highly deprived areas tend to be more condense, nearer to roads with high concentration of pollution, and include less green space. It is therefore thought that this group will greatly benefit from improvements in air quality and a reduction in exposure to pollution. The Council will use the public consultation to support the identification of any potential impact.

Potential Impacts

• Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

This group are particularly vulnerable to poor air quality due to their homes and residencies being near areas where pollution levels are high. They will positively benefit from improvements in air quality and reducing exposure to pollution.



4g. Religion or belief Data

Borough Profile 12

- 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

- 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%

What data will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Data sources include:

- Haringey JSNA
- 2011 Census ONS
- Haringey State of the Borough December 2024
- Resident's Survey 2021

Potential Impacts

• Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The air quality action plan will have a positive impact on residents irrespective of their religion or beliefs, by improving air quality and reducing exposure to pollution.

¹² Census, 2021 – <u>Religion, England and Wales - Office for National Statistics (ons.gov.uk)</u>



4h. Sex Data Borough profile ¹³

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

Target Population Profile

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

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Data sources include:

- Haringey JSNA
- 2011 Census ONS
- Haringey State of the Borough December 2024
- Resident's Survey 2021

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

This Air Quality Action Plan and the measures detailed within would apply to all individuals within the borough; therefore, there is no overrepresentation of this protected class compared with the wider borough profile.

Reducing toxic pollutants such as NO₂, PM₁₀ & PM_{2.5} and reducing exposure to poor air quality will benefit all residents in the borough. It is anticipated that people with this protected characteristic will not be disproportionately impacted by this policy and have no specific needs relating to this characteristic. The Council will use the public consultation to support the identification of any potential impact.

Potential Impacts

• Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The air quality action plan will have a positive impact on residents irrespective of their sex, by improving air quality and reducing exposure to pollution.

4i. Sexual Orientation

¹³ Census 2021 – Gender identity: age and sex, England and Wales - Office for National Statistics (ons.gov.uk)



Data

Borough profile ¹⁴

- 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

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

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Data sources include:

- Haringey JSNA
- 2011 Census ONS
- Haringey State of the Borough December 2024
- Resident's Survey 2021

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

This Air Quality Action Plan and the measures detailed within would apply to all individuals within the borough; therefore, there is no overrepresentation of this protected class compared with the wider borough profile.

Reducing toxic pollutants such as NO₂, PM₁₀ & PM_{2.5} and reducing exposure to poor air quality will benefit all residents in the borough. It is anticipated that people with this protected characteristic will not be disproportionately impacted by this policy and have no specific needs relating to this characteristic. The Council will use the public consultation to support the identification of any potential impact.

Potential Impacts

¹⁴ Census, 2021 – <u>Sexual orientation, England and Wales - Office for National Statistics (ons.gov.uk)</u>



• Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The air quality action plan will have a positive impact on residents irrespective of their sexual orientation, by improving air quality and reducing exposure to pollution.

4j. Socioeconomic Status

Data

Borough profile

Income

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023¹⁵
- 19.6% of residents were claiming Universal Credit as of March 2023¹⁶
- 29.3% of jobs in Haringey are paid below the London Living Wage¹⁷

Educational Attainment

- Haringey ranks 25th out of 32 in London for GCSE attainment (% of pupils achieving strong 9-5 pass in English and Maths)¹⁸
- 3.7% of Haringey's working age population had no qualifications as of 2021¹⁹
- 5.0% were qualified to level one only²⁰

Area Deprivation

Haringey is the 4th 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.²¹

Target Population Profile

Income

- 6.9% of all the population of Haringey were claiming unemployment benefit as of April 2023.
- 19.6% of all residents were claiming Universal Credit as of March 2023.
- 29.3% of jobs in Haringey are paid below the London Living Wage

Educational Attainment

- Haringey ranks 25th out of 32 in London for GCSE attainment (% of pupils achieving strong 9-5 pass in English and Maths)
- 3.7% of Haringey's working age population had no qualifications as of 2021.

¹⁸ DfE – <u>GCSE attainment and progress 8 scores</u>

¹⁵ ONS – <u>ONS Claimant Count</u>

¹⁶ DWP, StatXplore – <u>Universal Credit statistics</u>, 29 April 2013 to 9 March 2023 - GOV.UK (www.gov.uk)

¹⁷ 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

¹⁹ LG Inform – Data and reports | LG Inform (local.gov.uk)

²⁰ LG Inform – Data and reports | LG Inform (local.gov.uk)

²¹ IMD 2019 – English indices of deprivation 2019 - GOV.UK (www.gov.uk)



• 5.0% were qualified to one level only.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Data sources include:

- Haringey JSNA
- 2011 Census ONS
- Haringey State of the Borough December 2024
- Resident's Survey 2021

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

This Air Quality Action Plan and the measures detailed within would apply to all individuals within the borough; therefore, there is no overrepresentation of this protected class compared with the wider borough profile.

Reducing toxic pollutants such as NO₂, PM₁₀ & PM_{2.5} and reducing exposure to poor air quality will benefit all residents in the borough. Studies have shown that there is a strong correlation between deprivation and pollution. Homes and residences in highly deprived areas tend to be more condense, nearer to roads with high concentration of pollution, and include less green space. It is therefore thought that this group will greatly benefit from improvements in air quality and a reduction in exposure to pollution. The Council will use the public consultation to support the identification of any potential impact.

Potential Impacts

 Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

The air quality action plan will have a positive impact on residents irrespective of their socioeconomic status, by improving air quality and reducing exposure to pollution.

5. Key Impacts Summary 5a. Outline the key findings of your data analysis.

It is expected that the Borough wide Air Quality Action Plan will yield positive outcomes for all groups characterised by a protected characteristic. The primary aim of the action plan is to tackle air pollution, reduce toxic pollutants such as NO₂, PM₁₀ & PM_{2.5} and,



reducing exposure to poor air quality behaviour to create a safer and cleaner environment for all residents, and everyone working or visiting the borough. It aims to benefit a diverse range of individuals without discrimination.

5b. Intersectionality

- Many proposals will predominantly impact individuals who have more than one protected characteristic, thereby transforming the impact of the decision.
- This section is about applying a systemic analysis to the impact of the decision and ensuring protected characteristics are not considered in isolation from the individuals who embody them.
- Please consider if there is an impact on one or more of the protected groups? Who are the groups and what is the impact?

Considering intersectionality is crucial in discussions about air pollution because it enables a deeper understanding of how various external factors can intersect and exacerbate each other, resulting in more complex and severe impacts to exposure to poor air quality. For instance, a young child, living household located in the east of the borough in overcrowded housing conditions near a busy main road is more likely suffer from negative health impacts as a result of being exposed to high levels of air pollutants.

This air quality action plan is likely to have a positive impact on all regardless of any held protected characteristic. We do not have data to suggest that any groups that cross two or more equality strands have been more or less affected by previous air quality action plans within the borough or would be more or less affected by the proposed borough wide air quality action plan. We will continue to identify and address any equality implications for groups that have one or more protected characteristic.

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

The proposed public statutory consultation will endeavour to be as inclusive as possible and target these protected groups to ensure they are able to make contribution to the consultation and the shaping of the new air quality action plan. This will be done by initial approach to targeted relevant groups, organisations and stakeholders. Officers will attend meetings/forums with users and members to provide further information and clarity about the action plan, answer any questions and assist with the completion of the on-line survey. A hard copy of the survey will also be made available.

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

Summarise the key implications of the decision for people with protected characteristics.

In your answer, please consider the following three questions:



- 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?
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

It is not believed that this proposal would result in any direct or indirect discrimination for any group that shares a protected characteristic. However, as mentioned above, while the plan will have a positive impact on all protected characteristics by reducing pollution sources and pollution exposure, some groups may be disproportionately affected by some of the proposals set out in the action plan (i.e. traffic calming measures), as some protected characteristics (age and disability) rely on personal vehicles to move around the borough and/or to provide essential care and assistance. This impact will be reduced and/or mitigated by additional scheme specific EQIAs being undertaken as required.

7. Amendments and mitigations

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

Further information on responding to identified impacts is contained within accompanying EQIA guidance

Please delete Y/N as applicable

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. If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them Y/N

Y – No Major change to the proposal

Adjust the proposal: the EQIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below **Y/N**

N – No adjustments to the proposal

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. **Y/N**

N – Not applicable



7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?

Action:

Not Applicable at this time- but may be subject to change following statutory consultation

Lead officer: Edward Ritchie

Timescale: To be reviewed following public consultation. (if approved)

Please outline any areas you have identified where negative impacts will happen because 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 the:

Not Applicable

7. Ongoing monitoring

Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented.

- Who will be responsible for the monitoring?
- What the type of data needed is and how often it will be analysed.
- When the policy will be reviewed and what evidence could trigger an early revision
- How to continue to involve relevant groups and communities in the implementation and monitoring of the policy?

The feedback within the statutory public consultation in respect of the implementation of the proposed Air Quality Action Plan, will also be monitored. Community and faith groups, relevant stake holders and support services will be contacted to encourage participation where it is apparent that the level of response from certain protected groups, socio economic groups or geographical areas, is poor or disproportionate, given the borough's demographics

Date of EQIA monitoring review:

Following public consultation (if approved)

8. Authorisation

EQIA approved by (Assistant Director/ Director): Barry Francis / Zoe Robertson.

[Type answer here].

Date



9. 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.