Appendix D

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	School Street Plan (2023)
Service area	Carbon Management, Placemaking and Housing
Officer completing assessment	Joe Baker / Tim Walker
Equalities/ HR Advisor	Joe Wills
Cabinet meeting date (if applicable)	13 June 2023
Director/Assistant Director	David Joyce / Rob Krzyszowski

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*

The proposed decision is to approve the new School Street Plan (2023) that is being presented to Cabinet in June 2023.

This new plan refreshes the previous School Street Plan (2020) and sets out the programme for delivery of School Streets between 2023 and 2026. The 2020 Plan was subject to an EqIA which was updated in 2022.

The new Plan:

- Notes the 23 School Streets projects that have been delivered to-date
- Identifies 38 more School Street projects (covering 58 educational establishments) that are considered feasible.
- Notes that delivery of these School Streets is subject to design, consultation and further decision making on the details
- Uses the same design techniques as previously agreed
- Introduces “Healthy School Zones” which are new measures around educational establishments that cannot (for technical reasons) have a School Street.

The key stakeholders are pupils, teachers, parents/carers, residents and businesses.

School Streets will restrict some motorists vehicular access to some road(s) during school drop-off and pick-up times. Those who are most likely to be impacted by proposed School Streets are those who need vehicular access to these roads during the times of operation. Those who are most likely to benefit from a School Street are those who want or need physical actively in a safe space, and those who can benefit from a calmer route to the school at the start of the day. Children and those with health conditions which make them more vulnerable to health impacts from poor air quality will also benefit. Those who are likely to be negatively impacted by proposed School Streets are those who need or want vehicular access to these roads during the times of operation.

For measures to reduce the impact of poor air quality in and around an educational building these may include measures such as Living Walls (selected plants growing along boundary fences) and mechanical plant (to filter internal air quality). Alongside improving existing equipment on site (such as boilers) to emit fewer pollutants. Those who are most likely to benefit from Healthy School Zones are those who use the schools and it grounds. There are expected to be no groups negativity impacted.

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

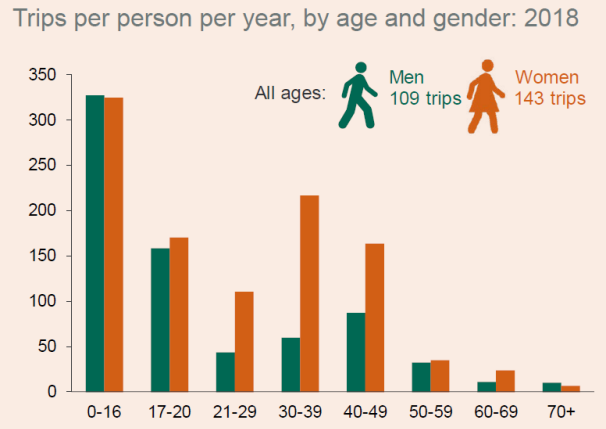
This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	• Census 2021 • Haringey borough profile data • Haringey school data. • Annual transport survey by the UK government • Scottish Government report	N/A
Gender Reassignment	• Haringey Borough profile data	N/A
Age	• Haringey borough profile data • Additional data comes from the UN and the UK transport survey	N/A
Disability	• Haringey borough profile data	N/A
Race & Ethnicity	• Haringey borough profile data • Mayor of London	N/A
Sexual Orientation	• Haringey borough profile data	N/A
Religion or Belief (or No Belief)	• Haringey borough profile data	N/A
Pregnancy & Maternity	• Haringey borough profile data	N/A
Marriage and Civil Partnership	• Haringey borough profile data	N/A

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?

Sex

Data from Scotland and the UK Transport Survey finds that women were more likely to escort children to school than men. We can assume that this is also true in Haringey.



The graph above, from the UK Transport Survey, demonstrates that women between 21-49, who are the group most likely to have primary school aged children, make more trips on average than men. When taken with the data showing that women are more likely to accompany children on the school run, this suggests that women are making more of the school run trips in Haringey than men.

Therefore, women will be more affected by this proposal than men, as they may have to change the way they get to school.

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

Implementing a Healthy School Zone will benefit these groups by improving air quality in and around the schools and reducing exposure levels.

Gender Reassignment

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

There is no data to suggest that School Streets or Healthy School Zones will disproportionately affect anybody who is undergoing or has undergone gender reassignment.

Age

These proposals will affect people with primary school aged children or children of this age group in their care, residents and businesses near the schools, teachers, the children who attend the schools and vehicle owners who use the road(s) for any other purpose.

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Data on air quality shows that it is particularly harmful for children and elderly people.

Children under the age of 12 have the highest percentage of pedestrian fatalities. The peak time for pedestrian injuries from vehicles is during the morning rush hour, which includes the school run. Therefore, young children will benefit most from the road safety improvements.

Implementing the School Street Plan and Healthy School Zones will therefore benefit these groups by improving air quality at the schools with the worst air quality, improving road safety, and reducing exposure levels to pollutants.

Disability

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

School Streets have the potential to affect a disabled resident's access to their road or property. It would also affect any disabled person who needs vehicle access to the road for other reasons, such as disabled pupils being driven to the school. The plan includes recommendations for those with blue badges, who require access to a property within the School Street, to be exempt from the School Street restrictions to mitigate this. Vehicles transporting SEN students to the school will also be exempt from the restrictions.

Implementing a Healthy School Zone will benefit these groups by improving air quality in and around the schools and reducing exposure levels.

Race & Ethnicity

Data shows that BAME individuals are more likely to be exposed to poor air quality in London than those not from BAME groups. We also know that poor air quality is more common in the south and east of Haringey, whilst the proportion of BAME residents is also higher in the east of Haringey. Therefore, we can surmise that BAME communities are presently more exposed to poor air quality in Haringey than non-BAME groups.

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

Implementing a Healthy School Zone will benefit these groups by improving air quality in and around the schools and reducing exposure levels.

Sexual Orientation

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

There is no data showing that School Streets or Healthy School Zones will disproportionately affect people as a result of their sexual orientation.

Religion & Belief (or No Belief)

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

There is no data showing that School Streets or Healthy School Zones will disproportionately affect people as a result of their sexual orientation.

Pregnancy & Maternity

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

No data shows that School Streets or Healthy School Zones will disproportionately target those who are pregnant. However, more mothers are likely to be taking children to and from schools. Alongside this, as explained in section 5, the effects of School Streets on those who are pregnant has been taken into consideration during the development of the School Street Plan.

Marriage and Civil Partnership

Air quality exposure is worse inside of a vehicle than outside of it, so all groups, including those with protected characteristics, will benefit from increased active travel by lower exposure to poor air quality. They will also benefit from the other positives of active travel, such as the associated health benefits.

Implementing the School Street Plan will therefore benefit these groups by improving air quality at the schools with the worst air quality and improving road safety at schools with the worst road safety issues.

There is no data to suggest that those in a marriage or civil partnership will be disproportionately affected by the School Streets or Healthy School Zones proposals.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

During the trial of the School Streets launched to date, each project has been subject to statutory and informal consultation with key stakeholders: schools, residents living near the schools, parents and carers who transport the children to school and the school itself.

Each future School Street and Healthy School Zone will have its own engagement and consultation process whereby all people affected by a scheme have input into its delivery.

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?

Feedback from Haringey's first School Street Plan has informed the new School Street Plan. This feedback has been used to better understand how a scheme can impact on individuals with protected characteristics and these lessons have been embedded into the Council's approach moving forward.

For example, the School Street Plan recommends ANPR camera enforcement in the vast majority of School Streets, which allows all residents within the School Street to leave the zone during the times of operation. This is in response to feedback from residents, school staff and officers about the bollard system at Lordship Lane. ANPR cameras are a way to ensure those with protected characteristics who live within a zone are not negatively impacted by the School Street scheme.

Analysis of exemption data shows that approximately 14% of exemptions have been issued to motorists with a Blue Badge or have a disability that prevents the parents, carer or pupil from walking, cycling or wheeling to school. This indicates that the exemption system is working for those who most need it.

The final measures recommended by the Healthy School Zone will be discussed and confirmed with the school. Any identified local needs of the school's community will be addressed through this process.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

1. **Sex**

By increasing active travel and improving road safety at schools it is anticipated that women, who are currently underrepresented among cyclists, will feel more confident and increase uptake of these modes.

Improving air quality and road safety in and around our schools will have a positive net benefit for women in Haringey as national data shows that women are more likely to escort children to school than men, and be teachers within the establishments.

Positive		Negative		Neutral impact		Unknown Impact	

2. **Gender reassignment**

Implementing School Streets and Healthy School Zones is not expected to have any specific impact for those who have undergone or who are undergoing gender reassignment.

If any inequity in delivery is identified, steps will be taken to rectify this.

Positive		Negative		Neutral impact		Unknown Impact	

3. Age

It is anticipated that delivering School Streets and Healthy School Zones will benefit young people who will increase levels of active travel, be safer from cars and benefit from improved air quality. It is also anticipated that this group will benefit from the roads outside of their school being quieter, improving their confidence to walk and cycle

By improving the public realm, and cleaner air there is likely to be more social interaction which would lower the levels of social isolation that predominantly older people feel.

Positive		Negative		Neutral impact		Unknown Impact	

4. Disability

It is anticipated that those with a disability will benefit from the improved air quality that School Streets and Healthy School Zones bring, the more accessible and public realm focussed improvements associated with School Streets and Healthy School Zones and from there being fewer cars on the road.

There may be negative impacts associated with restricting vehicle access to certain roads at certain times, however, this can be mitigated by allowing those with a blue badge who require access to apply for an exemption – allowing them access even during the times of restriction.

Exemptions for Blue Badge holders are provided where access is required. “Access” means those who require access to premises within the street. Exemptions are not provided for those blue badge holders motorists who wish to pass through a School Street as a convenience when the journey could be taken via another route. This exemption is also available for school staff with a blue badge who need to drive into the School Street.

Exemptions for School Streets are also provided for vehicles that are used to transport children or adults who have disability access requirements. The restrictions apply to taxi and private hire vehicles and we advise residents to arrange taxi trips outside of the restricted times. Whenever specific taxi or private hire vehicles are used on a regular basis by a Blue Badge holder we will consider the exemption on case by case basis.

Positive		Negative		Neutral impact		Unknown Impact	

5. Race and ethnicity

BAME communities in Haringey are more likely to live in areas with poor air quality. Therefore, implementing the School Street Plan will have a positive impact on BAME communities by improving air quality.

Positive		Negative		Neutral impact		Unknown Impact	

6. Sexual orientation

It is anticipated that implementing the School Street Plan will have a neutral impact on those whose sexual orientation is a protected characteristic. School Streets and Healthy School Zones will not impact or affect this group in a different way to any other group.

Positive		Negative		Neutral impact		Unknown Impact	

7. Religion or belief (or no belief)

It is anticipated that the School Street Plan will have a neutral impact based on religion or belief, as there is no evidence that implementing School Streets will disproportionately impact anyone because of their religion or belief.

Ensuring suitable levels of access to places of worship will be necessary during the implementation phase of specific School Streets.

Positive		Negative		Neutral impact		Unknown Impact	

8. Pregnancy and maternity

Implementing School Streets and Healthy School Zones will have a positive impact on pregnant people. This is because poor air quality is more harmful to pregnant people.

There are also negative impacts associated with School Streets for pregnant people. This is because pregnant people are less able to benefit from active travel, may have mobility issues and those living in School Streets zones may need visits from health care professionals. The Council will endeavour to ensure any School Street scheme does not result in disproportionately negative impacts for this group and implement appropriate mitigating measures.

School Streets and Healthy School Zones are a proportionate measure to achieve a legitimate aim and the benefits associated with improved air quality will outweigh any negative impacts.

Positive		Negative		Neutral impact		Unknown Impact	

9. Marriage and Civil Partnership

School Streets and Healthy School Zones will have a neutral impact on marriage and civil partnership. People in a marriage or in a civil partnership will be impacted the same by this policy.

Positive		Negative		Neutral impact		Unknown Impact	

10. Groups that cross two or more equality strands e.g. young black women

Women are more likely than men to escort children to school. Therefore, improving air quality by schools is likely to have a positive impact on BAME women in Haringey. BAME pregnant women and BAME young women will therefore stand to benefit from the improvements to air quality and road safety.

Religious people with disabilities who need to access a place of worship via motor vehicle in the School Streets and Healthy School Zones during the times of operation could be disadvantaged by the schemes. However, the policy on exemptions allows for enough leeway to grant exemptions in these cases. Furthermore, most zones will not have a place of worship within them. In the zone(s) that do, this issue should be identified before beginning consultation and should be mitigated to ensure that a scheme does not negatively impact this group. Religious organisations within or near the zone will be engaged and have opportunities to request exemptions for these individuals before a scheme is implemented.

We know that certain transport inequalities exist in Haringey. In summary, School Streets promote active travel, improve air quality and have potential to reduce inequalities that affect protected groups including children and young people and BAME communities. However, some groups may not be able to benefit from engaging in active travel, including people with mobility-related disabilities, some older people, and pregnant people. These groups may be negatively impacted by reduction in private car use. The School Street Plan does not promote a complete ban on vehicle access to the zones due to the inequalities that exist and makes sure these groups are considered in developing fair policies.

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?**
- No. There will be no direct discrimination as a result of implementing School Streets and Healthy School Zones. Each scheme will be unique and any issues that are identified will be assessed on a case-by-case basis. - Most of the protected groups are experiencing the negative impacts of poor air quality at a disproportionate rate and therefore School Streets will provide an overall positive. - Those belonging to a protected group, such as disabled residents, will be accommodated by the School Streets scheme and their access to their residence will not be negatively impacted. - In all instances, where a Penalty Charge Notice (PCN) is issued to a vehicle that contravenes the traffic restriction, there is a formal appeals process in place. This allows motorists to challenge the PCN if they believe an exemption applied or that there are mitigating circumstances that need to be considered.

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. 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.	Yes
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out below 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	No
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.	No

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

Disabled residents may need vehicle access to a property during the times of operation of a School Street	Continue to issue exemptions to blue badge holders who require access into a School Street Support disabled individuals in the School Street to apply for blue badges if they do not already have one.	Highways and Parking	Ongoing
Pregnant or elderly people may have increased reliance upon visits from healthcare professionals	Continue to issue exemptions for medical professionals who require access into a School Street to reach patients.	Highways and Parking	Ongoing

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

All groups, including those with protected characteristics, will have their access to the roads at each school limited for certain periods. However, those who have a blue badge will maintain access subject to issuance of an exemption which can be applied for.

In all instances, where a Penalty Charge Notice (PCN) is issued to a vehicle that contravenes the traffic restriction, there is a formal appeals process in place. This allows motorists to challenge the PCN if they believe an exemption applied or that there are mitigating circumstances that need to be considered.

Therefore, the other groups with protected characteristics who will have their access restricted will not be negatively impacted in a disproportionate or discriminatory way. These groups will have to walk slightly further to the school gates, along with all other groups, except those who require vehicle access for mobility reasons. All groups also stand to benefit from the improvements of air quality and road safety, which often disproportionately affects people with protected characteristics.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

- **Concerns raised by the schools.** This includes monitoring the impact on any protected groups such as accompanied transport systems for vulnerable students or those with mobility needs. The Council will engage with the school at a minimum annually to offer feedback on the School Street.
- **Number of Blue Badge Users applying for exemptions.** This will ensure that communications to road users within / using the School Street are aware of exemptions that they can apply for.

- **Concerns raised by residents.** To ensure that all communications highlights that those with mobility concerns are aware of exemptions.
- **Air Quality Levels.** The Council will continue to monitor air quality levels outside the schools to ensure that the benefits of the School Streets are measured.

7. Authorisation	
EqIA approved by Rob Krzyszowski (Assistant Director)	Date 31/05/23

8. Publication *Please ensure the completed EqIA is published in accordance with the Council's policy.*

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