

EQUALITY IMPACT ASSESSMENT

The Equality Act 2010 places a ‘General Duty’ on all public bodies to have ‘due regard’ to:

- **Eliminating discrimination, harassment and victimisation**
- **Advancing equality of opportunity**
- **Fostering good relations**

Additionally, the Council complies with the Marriage (same sex couples) Act 2013.

Haringey Council also has a ‘Specific Duty’ to publish information about people affected by our policies and practices.

All assessments must be published on the Haringey equalities web pages. All Cabinet papers must include a link to the web page where this assessment will be published.

This Equality Impact Assessment provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above, for more information about the Council’s commitment to equality; please visit the Council’s website.

Stage 1 – Screening

The proposals do not impact or run counter to the Public Equality Duty.

Stage 2 – Full Equality Impact Assessment

An Equality Impact Assessment provides evidence for meeting the Council’s commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an Equality Impact Assessment 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 EqlA to help inform their final decision. The EqlA 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 EIA process.

1. Responsibility for the Equality Impact Assessment

Name of proposal	Blue Badge and Disabled Bay – Operational Review
Service area	Commercial and Operations / Operations
Officer completing assessment	Greville Percival
Equalities/ HR Advisor	Lucy Fisher
Cabinet meeting date (if applicable)	September 2019
Director/Assistant Director	Stephen McDonnell

2. Summary of the proposal and its relevance to the equality duty

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*

Parking provision, in particular the Disabled Blue Badge scheme, makes a considerable contribution to the independence and social inclusion of disabled residents.

Disabled Bays in Haringey may be used by anyone with a Blue Badge. However, we are aware of a growing concern from disabled residents, who cannot access the bay which has been installed for them, because other Blue Badge holders are parking in it. This problem is particularly acute close to retail areas, transport links or places of interest.

Eligibility criteria for Disabled Bays is set by the Council but is largely based on the Blue Badge Criteria. However, it has not been reviewed for some time and evidence gathered has suggested that elements of the Disabled Bay eligibility criteria should be extended to ensure that the Council can meet the needs of a greater number of disabled people.

At present there is no formal appeals process for rejected disabled bay applications. The Council seeks to address this with the introduction of a formal appeals process, which is set out in the related Cabinet report.

Improvements to the current Disabled Blue Badge and Disabled Parking Bay are proposed in order help residents with disabilities have allocated (dedicated bays) access to parking space outside their homes. The improvements are:

- The introduction of personalised (dedicated) disabled parking bays - allocated to eligible residents with disabilities thereby ensuring they can always access their parking bays.
- Extended eligibility criteria for Blue Badges and disabled parking bays to include a further assessment opportunity for those with very restricted mobility who, for their own reasons, are not in receipt of disability benefits.

The new Blue Badge scheme criteria will extend eligibility to people who:

- cannot undertake a journey without there being a risk of serious harm to their health/safety,
- cannot undertake a journey without it causing them considerable psychological distress,
- have very considerable difficulty when walking (both the physical act and experience).
- People with “hidden disabilities” such as autism and other mental health conditions will now also be able to apply for a blue badge permit. The new scheme will also benefit parents who

have children with mental health issues and for people who suffer from anxiety most notably by making it easier to park close to home.

The introduction of dedicated / allocated disabled bays will mean that a resident who complies with any of the following criteria, will be able to apply for a disabled bay allocated for their use only and not for general use by blue badge holders:

1. They are the owner or nominated driver of the vehicle registered to the applicant's home address.
2. No parking is available within a reasonable distance of their home or workplace.
3. They are a Blue Badge holder.
4. They meet the Disabled Blue Badge Entitlement without further assessment criteria as set out in the DfT Blue Badge criteria - Entitlement without further assessment (automatic entitlement)
5. They do not meet the criteria set out in DfT Blue Badge criteria - Entitlement without further assessment (automatic entitlement) but are unable to walk more than 20 metres (as determined by a mobility or medical assessment).

There is no universal definition of disability. Haringey uses the Census data on long term health problem or disability and self-reported health as a proxy. This shows that 14% of residents – particularly older people - have a long term health problem that limits their day to day activity, lower than England but in line with London. 5.7% of residents report being in bad health, slightly higher than England and London. The proposal will benefit people with disabilities by extending eligibility for issue of Blue Badges and disabled bays.

Taking DfT guidance into consideration, and having assessed reports from Disability Rights UK, National Autistic Society, Disabled Persons' Transport Advisory Committee (DPTAC) and other local authorities; Haringey's proposal for the current Disabled Blue Badge and Disabled Parking Bay as part of the Parking Action Plan (PAP) is designed to extend eligibility for Blue Badges and Disabled Bays and address what are often described as 'hidden disabilities'.

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	<i>Haringey Equalities Profile</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	No impact
Gender Reassignment	<i>Haringey Equalities Profile</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	No impact
Age	<i>Haringey Equalities Profile</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	No impact
Disability	<i>Haringey Equalities Profile</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf DfT, DisabilityRights UK http://www.legislation.gov.uk/uksi/2019/891/contents/made DfT, Blue Badge scheme: Consultation on Eligibility, 21 January 2018, para 1.2 https://www.disabilityrightsuk.org/news/2019/may/blue-badge-scheme-extended-30-august-2019 https://www.autism.org.uk/get-involved/media-centre/news/2019-06-14-blue-badge-what-happens-next.aspx	No impact
Race & Ethnicity	<i>Haringey Equalities Profile</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	No impact
Sexual Orientation	<i>Haringey Equalities Profile</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	No impact
Religion or Belief (or No Belief)	<i>Haringey Equalities Profile</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	No impact
Pregnancy &	<i>Not available</i>	No

Maternity		<i>impact</i>
Marriage and Civil Partnership	<i>Haringey Equalities Profile</i> http://www.haringey.gov.uk/sites/haringeygovuk/files/equalities_profile_of_haringey.pdf	<i>No impact</i>

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough’s demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

Summary of Key Findings

This policy was examined with reference to available data on both current and potential users of the blue badge scheme. Data sources used to inform the EQIA included; English Transport Statistics, *Health Inequalities briefing Haringey* (Public Health England March 2018), available statistics from DWP on Disability Living Allowance, Personal Independence Payment and Attendance Allowance. Additionally, data was examined from research conducted by Department for Transport (DfT) on the use of Blue Badges. One of very few detailed equality impact assessments on Blue Badges was conducted by Transport Scotland in 2016. Haringey does not currently compile its own statistics for protected characteristics in terms of Blue Badge Issue or usage. However, Haringey does carry out consultations to review the impact of policy changes and introduction of schemes. We will review the operation of Blue Badge and Disabled Bays by consulting users after the first year of the revised operation.

Key Findings

On Sex There is a relatively equal gender split in Haringey, just over half of the population is female (50.5%), in line with England and London (2011 Census)

The Health Inequalities Briefing by Public Health England stated that there could be a greater impact from the policy change on women, assuming that Blue Badge take-up rates are similar by gender. There are more women than men who hold blue badges, as women tend to live longer than men and most blue badge holders are over 60 according to the DfT report. Extended eligibility of Blue Badges and the provision of dedicated / allocated Disabled Bays will provide positive results for a greater proportion of older people – particularly women. This is backed up by Census data for Haringey which reports that 14.8% of women in Haringey have disabilities which limit day to day activities. This compares with 12.4% of men

On disability, The DfT policy clarifies that the Blue Badge and Disabled Bays scheme is designed to ensure equity by creating a definition for eligibility which is not based on any particular condition, but on the ability to undertake a journey safely. This accords with the existing mobility definition, which is also focussed on the ability to move. Although there is no data available for Haringey, it is reasonable to assume that the policy will result in some increased numbers of blue badges on issue locally in Haringey. The DfT study does not envisage substantial changes. The Census indicates that 6.8% of people in Haringey have a disability that limits their day-to-day activities a lot.. The Blue Badge scheme plays a vital role in allowing disabled people to maintain their independence through improved parking concessions. Blue Badges enable their holders to visit their families and friends, and to access jobs, healthcare and leisure activities.

DfT consultations show that that 75% of badge holders would go out less often without a badge and 64% would be more reliant on friends and family members.

For the new rules to work, officials making decisions about Blue Badges need to understand 'hidden disabilities and how these can affect people's ability to travel around. This means that assessments should be undertaken by qualified officials.

On age Census data and the studies cited above confirm that older people are more likely to have disability or long term mobility restrictions and the Blue Badge extended eligibility scheme and the Dedicated Disabled Bay scheme are both likely to have positive impact for older people with limited mobility issues.

On Ethnicity Census data indicates that 6.7% of White people in Haringey have a severely limiting disability; 7.3% of African / Caribbean / Black communities have a severely limiting disability, and 6.8% of Asian / Asian British. Although Haringey is within the top 4 London Boroughs for Eastern European in-migration, the census groups all as White Other. Improved eligibility for Blue Badges and Disabled Bays will have positive impact on communities living in the more deprived part of the Borough most notably Northumberland Park ward but across the wider Tottenham area. Given that economic deprivation is a factor associated with increased risk of limiting disability, then the slight differences by ethnicity could be accounted for by the fact that BAME communities are mainly located in the east of the borough which is more economically deprived and less healthy than the west. The proportion of non-White British communities varies from 35.2% in Muswell Hill to 83.4% in Northumberland Park.

On Sexual Orientation

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013 (ONS Integrated Household Survey). In Haringey this equates to 6,491 residents. There are no statistics or other evidence to suggest that sexual orientation is a factor in the issue or take up of Blue Badges or Disabled Bays

On Religion and Belief

Haringey is one of the most religiously diverse places in the UK. The most common religion was Christianity, accounting for 45% of residents, less than London (48.4) and less than England (59.4%). The next most common religions were Muslim (14.3%) – higher than London (12.3%) - and Jewish (3%). Haringey had a lower percentage of residents who were Hindu (1.8%) and Sikh (0.3%) than London (5.0% and 1.5%, respectively). A quarter of Haringey residents stated that they did not have a religion, higher than London (20.7%).

There are no anticipated specific Blue Badge or Disabled Bay needs identified for people of different faiths within the borough and they should not be impacted in any way by the strategy. It is however unknown whether cultural issues in some faith groups may prevent people applying for Blue Badges or Disabled Bays.

Future consultations reviewing Blue Badge operation will examine whether there are any such barriers to different protected groups and identify possible remedial actions if applicable.

On Pregnancy & Maternity

There is no evidence or information from the published sources or from Haringey's consultations to indicate that increased eligibility for Blue Badges and allocated Disabled Bays will have either positive or negative impact on women in Haringey who are pregnant or are caring for young babies.

On Gender Reassignment

There is no evidence or published information to indicate either positive or negative impact on people transitioning gender. The Blue Badge and allocated Disabled Bays improvements scheme aims primarily to comply with Section 20 of the Equality Act 2010 to ensure that disabled people

are not put at a substantial disadvantage, compared to people who do not share the disability, when accessing services. People transitioning or who have undergone gender reassignment will be treated no differently under the Blue Badge & Disabled Bays scheme to people who are not in this protected characteristic.

On Marital status and Civil Partnership

In 2011, Haringey had a higher proportion of couples in a registered same sex civil partnership than England and London. 0.6% (or 1,191 residents), compared to 0.2% for England and 0.4% for London. People who are in a civil partnership will be treated no differently under the Blue Badge & Disabled Bays scheme to people who are married.

Recommendations and Conclusion

The EQIA process did not identify any further issues which would have a detrimental impact on protected groups. Evaluation of the scheme when in operation will enable us to gather further data which will give a better understanding of any equality issues.

Government and local authorities are committed to ensuring that physical and non-physical disabilities are given parity – and equalities legislation demands this.

The EQIA process did not identify any issues which would have an adverse or differential impact on protected groups,. However, data is limited and the impact of the scheme on protected characteristics should be reviewed through consultations.

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 provide a brief outline of:

- *How you intend to consult with those affected by your proposal including those that share the protected characteristics*

Further information on consultation is contained within accompanying EqIA guidance (part 9)

Existing research from the DfT and councils in England make it clear that as councils will be responsible for the operation of all aspects of the blue badge and disabled bay schemes then they will need to review the operational impact. Haringey will do this through its ongoing consultation and research actions.

The Blue Badge and Disabled Bay scheme will be kept under review with reports submitted to the Head of Service to ensure that improvements have been delivered, and that disabled people are benefitting from the changes.

The following monitoring information arrangements will be put in place:

- Reports from the Parking Transformation team on, for example, turnaround times, use of on-line versus paper applications, levels of enforcement activity and issue rates;
- Reports and analysis carried out by Department for Transport, Disability Rights and other stakeholders.
- Public consultations will review the operation and impact of the Blue Badge and Disabled

Bay scheme along with feedback from stakeholders.

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?

A DfT 'Blue Badge Reform Programme' consultation in 2010 showed that 75% of badge holders would go out less often if they did not have a badge and 64% would be more reliant on friends and family members. For People with disabilities, the measures offer increased independence and less reliance on the support of family and friends. The Blue Badge and Disabled Bay review therefore offers significant positive benefits for this protected characteristic.

Existing consultations also confirm that more older people and others with disabilities which may not be self-evident, will be eligible for blue badges and disabled bays, and that both these protected characteristics will benefit from the extended eligibility.

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

EglA guidance (part 10)

1. Sex

The Health Inequalities Briefing by Public Health England stated that there could be a greater positive impact from the policy change on women, assuming that Blue Badge take-up rates are similar by gender. There are more women than men who hold blue badges, as women tend to live longer than men and most blue badge holders are over 60 according to a DfT report.

Positive	X	Negative		Neutral impact		Unknown Impact	
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2. Gender reassignment

Available data does not identify differential or adverse impact. Ongoing consultations will monitor the scheme's operation. A study by Lewisham Council of qualitative feedback on parking did not highlight any issues specifically attributed to gender reassignment as a protected characteristic [councilmeetings.lewisham.gov.uk/documents/s21957/Appendix]

Positive		Negative		Neutral impact	X	Unknown Impact	
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3. Age

Positive benefits for older age groups who are more likely to experience disabilities and/or mobility impairments that can be helped by the Blue Badge and Disabled Bay Improvements. Membership of the Blue badge scheme can assist older badge holders to park close to home and, if applicable, at their place of work. It can also give Increased ability to access goods and services, thereby promoting inclusion and independence, reducing social isolation, and

reducing expense on travel & parking costs

Positive	X	Negative		Neutral impact		Unknown Impact	
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4. Disability

Benefits of blue badges for individuals with disabilities include greater inclusion and independence, reduced social isolation, reduced expense on travel & parking costs, exemption from London Congestion charge and Ultra Low Emission Zone charge. Membership of the Blue badge scheme can assist disabled workers to park close to home and, where applicable, at their place of work.

Positive	X	Negative		Neutral impact		Unknown Impact	
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5. Race and ethnicity

Our data analysis has not identified any adverse impact but we will monitor its operation for any adverse effects when we review the scheme. Improved eligibility for Blue Badges and Disabled Bays will have positive impact on communities living in the more deprived part of the Borough most notably Northumberland Park ward but across the wider Tottenham area. The proportion of non-White British communities varies from 35.2% in Muswell Hill to 83.4% in Northumberland Park.

Positive		Negative		Neutral impact	X	Unknown Impact	
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6. Sexual orientation

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013 (ONS Integrated Household Survey). In Haringey this equates to 6,491 residents. There are no statistics or other evidence to suggest that sexual orientation is a factor in the issue or take up of Blue Badges or Disabled Bays.

Positive		Negative		Neutral impact	X	Unknown Impact	
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7. Religion or belief (or no belief) *(Please outline a summary of the impact the proposal will have on this protected characteristic and cross the box below on your assessment of the overall impact of this proposal on this protected characteristic)*

Data analysis has not identified any likely impact but we will monitor the implementation of the scheme for any adverse impact and take mitigating actions as appropriate or necessary

Positive		Negative		Neutral impact	X	Unknown Impact	
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8. Pregnancy and maternity

No likely impact but we will monitor the implementation of the scheme and take mitigating actions if necessary

Positive		Negative		Neutral impact	X	Unknown Impact	
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9. Marriage and Civil Partnership (*Consideration is only needed to ensure there is no discrimination between people in a marriage and people in a civil partnership*)

In 2011, Haringey had a higher proportion of couples in a registered same sex civil partnership than England and London. 0.6% (or 1,191 residents), compared to 0.2% for England and 0.4% for London. People who are in a civil partnership will be treated no differently under the Blue Badge & Disabled Bays scheme to people who are married.

Positive		Negative		Neutral impact	X	Unknown Impact	
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10. Groups that cross two or more equality strands

To the extent that the Parking Action Plan results in positive impacts for residents with protected characteristics, these positive impacts will be shared by all characteristics in which people have hidden and or self-evident disabilities which will now enable them to apply for Blue Badges and/or Disabled Bays.

Many people will identify with more than one protected characteristic. There are no Cumulative adverse or positive impacts identified in this plan on people who identify with more than one protected characteristic.

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 protected characteristics?**
- **Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?**
- **Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?**

The Blue Badge and Disabled Bay Review does not offer any potential for, or evidence that, the measures could discriminate directly or indirectly except in a positive way on people with disabilities or severe mobility impairments. Therefore, it is not considered to result in any direct/indirect adverse discrimination for any groups that share the protected characteristics.

The strategy is considered to offer potential benefits for all disabled residents in Haringey.

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 (part 11)

Outcome	Y/N
No major change: the EIA demonstrates the policy is robust and there is no basis for discrimination or adverse impact. All opportunities to promote equality have been taken.	Y
Adjust the policy: the EIA identifies potential problems or missed opportunities. Adjust the policy to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy.	N
Continue the policy: the EIA identifies the potential for adverse impact or missed	N

opportunities to promote equality. Clearly <u>set out below</u> the justifications for continuing with it. For the most important relevant policies, compelling reasons will be needed.	
Stop and remove the policy: the policy shows actual or potential unlawful discrimination. It must be stopped and removed or changed.	N

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact	Action	Lead officer	Timescale
No identified actual or potential negative impact apart from possible Blue Badge abuse or theft.	Regular monitoring by Parking Enforcement team		Ongoing
	Use of consultation to review operation of the scheme		Ongoing

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

The impact will be monitored through consultation feedback from residents and accompanied by monitoring of policy and practice in other London Boroughs, and through reports produced by the Department for Transport

7. Authorisation

EIA approved by	Date
(Assistant Director/ Director)	

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