

# Equality Analysis Form

## 1. Introduction

### 1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

## 2. Proposed change

Directorate	PLACE
Title of proposed change	Parking Policy
Name of Officer carrying out Equality Analysis	Anupa Patel

## 2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Briefly summarise the proposed change and why it is being considered. Please also state if it is an amendment to an existing arrangement or a new proposal.

**The proposal is to introduce a new Parking Policy that is intended to effectively manage parking provision across the borough in line with the Corporate Plan and the borough's growth objectives.**

**Our Corporate Plan for Croydon 2018-2022 sets out a number of priorities that are aimed at improving the environment we live in, and aim to make it more sustainable, to encourage and support health live. The key priorities linked to this Parking Policy include:**

- **An excellent transport network that is safe, reliable and accessible to all – by recognising the important link between transport and a sustainable environment and working collaboratively and undertaking informed decisions that are innovative based on the needs of a neighbourhood, for example, to encourage fewer short car journeys and reduce traffic congestion.**
- **A cleaner and more sustainable environment – by addressing air quality with the work we do, such as introducing pedestrian zones around schools to help improve air quality and reduce congestion.**
- **Happy, healthy and independent lives – by preventing issues from becoming a problem and having an environment that encourages and supports healthy living.**

**Air pollution is an important and increasingly more high profile public health issue, contributing to illness and shortened life expectancy. It disproportionately impacts on the most vulnerable in the population, in particular the sick, young and elderly. Those at higher risk include those with existing respiratory problems and chronic illnesses such as asthma and chronic obstructive pulmonary disease. People who live or work near busy roads are at particularly high risk of exposure to the health harms of air pollution.**

**There are many national & regional strategies that have been introduced to improve air pollution and reduce emissions over recent years and months to help improve the public's health.**

**The proposal is to introduce a Parking Policy for the borough, which will cover a range of actions to be delivered over a 3 year period aimed at reducing vehicle emissions that will help address public health priorities, the impact of vehicle emissions and congestion on air quality, the need for a shift to more active and sustainable transport modes, and the growing demand for kerbside space;**

**In the context of all the above, it is clear that the introduction of a Parking Policy for Croydon can play an important role in helping to achieve Croydon's Corporate outcomes by enabling a collaborative approach to managing parking provision across Croydon. As the borough grows in population and density the policy aims to improve the environment by delivering actions that will encourage and enable a lesser reliance on cars, a change to lower emitting vehicles and better management of the demand on the kerbside and that will secure a healthy and safe environment near to schools.**

An earlier revision of this document was created, reviewed and approved on 14 February 2019, in advance of a Cabinet decision on 25 March 2019 to consult on the draft Parking Policy. This revision of the document considers the result of the engagement that ended on 5 May 2019 and will support a decision to implement the parking policy.

Analysis showed that 142 out of the total 183 respondents completed one or more of the equalities questions. Of these 135 responded to age questions, 136 to disability, 134 to gender and 130 to ethnicity.

**Section 1, Collaborative Working - There was no standout concern nor support from any protected group regarding this section.**

**Section 2, Parking Management - Responses to this section of the policy reflected some elevated level of concern from the protected groups of Disability and Age. These relate to respondents saying there are not enough disabled bays; not enough is being done to curb illegal parking; and a concern that Electric Vehicle Charging Points (EVCPs) may infringe on pavement space. All of these concerns are recognised and will be addressed in the policy (see section 5 below).**

**Section 3, Controlled Parking Zones - There was no standout concern nor support from any protected group regarding this section.**

**Section 4, School Streets - Responses to this section of the policy reflect some elevated level of support from some protected groups. The greatest number in support of school streets was from the over 61 age group who were more likely to say it would be good for children and make parking easier for residents.**

**Section 5, Parking Charges – Of the respondents to this section, the disabled group showed some elevated level of concern for parking charges.**

**Section 6, Innovation and Technology - There was no standout concern nor support from any protected group regarding this section.**

**For detailed information see supporting document below.**

### **3. Impact of the proposed change**

**Important Note:** It is necessary to determine how each of the protected groups could be impacted by the proposed change. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

### 3.1 Additional information needed to determine impact of proposed change

**Table 1 – Additional information needed to determine impact of proposed change**

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table.		
Additional information needed	Information source	Date for completion

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

### 3.2 Deciding whether the potential impact is positive or negative

**Table 2 – Positive/Negative impact**

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.			
Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	Positive – as aim is to improve air quality & public health for all residents and visitors by implementing parking related measures.	Potential negative impact for older age group due to frailty. But the draft policy intends to mitigate this risk by implementing measures to exempt such people and this will be consulted upon. Overall we expect the positive impact of the policy to outweigh the negative impact due to a reduction in air pollution in a person's health.	Air Quality Action Plan 2017-22
Disability	Positive – as aim is to improve air quality & public health for all residents and visitors by implementing parking related measures. Positive – the policy can potentially enhance accessibility.	Potential negative impact on people with disabilities &/or long term health conditions, But the draft policy intends to mitigate this risk by implementing measures to exempt such people and this will be consulted upon. Overall we expect the positive impact of the policy to outweigh the negative impact due	Air Quality Action Plan 2017-22 Blue Badge Scheme Croydon Observatory

		to a reduction in air pollution in a person's health.	Disabled Parking Accreditation scheme, in association with Disabled Motoring UK.
Gender	Positive – as aim is to improve air quality & public health for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Gender Reassignment	Positive – as aim is to improve air quality & public health for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Marriage or Civil Partnership	Positive – as aim is to improve air quality & public health for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Religion or belief	Positive – as aim is to improve air quality & public health for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Race	Positive – as aim is to improve air quality & public health for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Sexual Orientation	Positive – as aim is to improve air quality & public health for all residents and visitors by implementing parking related measures.		Air Quality Action Plan 2017-22
Pregnancy or Maternity	Positive – as aim is to improve air quality & public health for all residents and visitors by implementing parking related measures.	The School Street operational policy gives schools the authority to exempt parents in latter months of pregnancy from the driving restrictions.	Air Quality Action Plan 2017-22

**Important note:** You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics.

### 3.3 Impact scores

#### Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact )
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

<b>Severity of Impact</b>	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	<b>Likelihood of Impact</b>			

#### Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

**Table 5 – Impact scores**

<p><b>Column 1</b></p> <p><b>PROTECTED GROUP</b></p>	<p><b>Column 2</b></p> <p><b>LIKELIHOOD OF IMPACT SCORE</b></p> <p>Use the key below to <b>score</b> the <b>likelihood</b> of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b>  <b>2 = Likely to impact</b>  <b>3 = Certain to impact</b></p>	<p><b>Column 3</b></p> <p><b>SEVERITY OF IMPACT SCORE</b></p> <p>Use the key below to <b>score</b> the <b>severity</b> of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b>  <b>2 = Likely to impact</b>  <b>3 = Certain to impact</b></p>	<p><b>Column 4</b></p> <p><b>EQUALITY IMPACT SCORE</b></p> <p>Calculate the <b>equality impact score</b> for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p><b>Equality impact score = likelihood of impact score x severity of impact score.</b></p>
Age	2	1	2
Disability	2	2	4
Gender	2	1	2
Gender reassignment	2	1	2
Marriage / Civil Partnership	2	1	2
Race	2	1	2
Religion or belief	2	1	2
Sexual Orientation	2	1	2
Pregnancy or Maternity	2	1	2



## 4. Statutory duties

### 4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

**Important note:** If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

## 5. Action Plan to mitigate negative impacts of proposed change

**Table 5 – Action Plan to mitigate negative impacts**

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.

Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	Potential negative impact on people with disabilities &/or long term health conditions,	Policy Action plan for adoption of the Disabled Parking Accreditation or London Plan, whichever is the highest standard for the provision of disabled parking bays various locations.  Policy Action plan for implementing School Streets, which will afford eligibility of carers and relatives to	Parking	BY Nov 2019  Upon adoption of the Parking Policy

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		drive during the restricted hours, to visit the vulnerable		
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				
Age	Potential negative impact for older age group due to frailty	Policy Action plan for implementing School Streets, which will afford eligibility of carers and relatives to drive during the restricted hours, to visit the vulnerable.	Parking	Upon adoption of the Parking Policy
Religion or belief				
Pregnancy or maternity		Policy Action plan for implementing School Streets, which will afford schools the authority to issue eligibility to drive during the restricted hours when needed during pregnancy.	Parking	Upon adoption of the Parking Policy
Marriage/civil partnership				

## 6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter **X** in column 3 (**Conclusion**) alongside the relevant statement to show your conclusion.

Decision	Definition	Conclusion - Mark 'X' below
No major change	<p>Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review.</p> <p>Analysis of the engagement results has found that no individual protected sub-group stands out as having responded negatively to the proposed policy. There has been some elevated concern about insufficiency in the parking bays accessible for the disabled; not enough is being done to curb illegal parking; and a concern that Electric Vehicle Charging Points (EVCPs) may infringe on pavement space. All of these concerns are recognised and mitigated in the policy actions plan (see Section 5). We will adopt either the Disabled Parking Accreditation or London Plan, whichever is the highest standard for the provision of disabled parking bays various locations. School Streets operational procedure is amended to formalize eligibility for carers and relatives of the vulnerable, and for pregnant school parents.</p> <p><b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</b></p>	X
Adjust the proposed change	<p>We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b></p>	
Continue the proposed change	<p>We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. <b>If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.</b></p>	
Stop or amend the	<p>Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.</p>	

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proposed change		
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet	Meeting title: Date:	
This decision will be considered after a formal consultation.	TBC after consultation but by October 2019	

## Supporting Documents:



Parking Policy Survey  
analysis summary 201

## 7. Sign-Off

Officers that must approve this decision		
Equality lead	Name: Yvonne Okiyo	Date: 16.07.2019
	Position: Equalities Manager	
Director	Name: Steve Iles	Date: 16.07.2019
	Position: Director of Public Realm, Place	