

# 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

<b>Directorate</b>	<b>SUSTAINABLE COMMUNITIES, REGENERATION &amp; ECONOMIC RECOVERY</b>
<b>Title of proposed change</b>	<b>PARKING POLICY 2023</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>David Wakeling – Parking Design Manager</b>

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

The proposed Parking Policy 2023 sets out the priorities for the next few years for parking in the Borough and changes to support the Borough and the recovery of the Council. Notable proposed changes include tackling blue badge fraud to improve access for those that rely on parking close to their destination, introducing virtual permits and new technologies to improve efficiency and the service we give to our customers.

Also included is a review of the roads with footway parking exemptions and where enforcement of the footway parking ban has been suspended. Only having clearly marked and signed footway exemptions will ensure that it is clear where such parking should take place and ensure that footways are retained for pedestrians including those with wheelchairs.

Part of the new policy includes the phased removal of Pay & Display machines recognising the increased cost of maintaining and emptying over 700 machines across the Borough and the significant rise in the use of Pay by Phone methods of payment. Parking charges will be reviewed as part of the new policy with a move away from the existing linear tariff.

Other proposed changes include a review of the Controlled Parking Zone (CPZ) hours of operation to recognise the changes in parking demand and habits since most CPZs were introduced back in the mid-1990s. Developing the Electric Vehicle Charging Strategy, car club policy and loading and servicing policy will ensure that the authority is up to date with changes to the motor industry, increased car free developments where car club vehicles provide an important role in reducing demand for the ownership and use of the private motorcar and changes with shopping habits recognising the greater use of delivery vehicles.

## 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. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. 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 Deciding whether the potential impact is positive or negative

**Table 1 – 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	<p>A higher proportion of older residents, visitors and commuters are likely to be disabled blue badge holders where the policy of tackling blue badge fraud should have a positive impact by ensuring that only those with genuine mobility needs will have greater access to parking as close as possible to their destinations.</p> <p>Likewise, the proposed improved footway parking policy will benefit those with restricted mobility including those with walking aids including wheelchair users who are more likely to be more senior.</p> <p>Surplus from parking charges is ring-fenced and, for example, contribute significantly to sustaining public transport fare concessions such as the Freedom Pass scheme for the elderly. The parking permit charges therefore indirectly supports the portion of the elder population that do not have a car or who choose to use public transport</p>	<p>The removal of Pay &amp; Display machines may have an impact on older residents, visitors and commuters who are less likely to have smart phones and may find this technology more challenging than the younger population.</p> <p>The program of phasing the removal of Pay &amp; Display machines aims to mitigate the impact on the elderly by initially retaining machines that are more likely to be used such as in town, district and local centres.</p> <p>The majority of machines in residential non-shopping areas are little used and their removal is unlikely to have a significant impact on elderly motorists.</p> <p>There is concern that the elderly are less likely to have smart phones which make booking time by phone relatively easy and the fact that elderly groups struggle more with technology than the younger groups. However, time can be booked using non-smart phones by phoning the RingGo number and following a set of commands. Also consideration is being given to PayPoint payments for parking on and close to high streets as an alternative to Pay by Phone.</p>	<p>Office for National Statistics using data from the 2021 census showed that after the ages of 70 to 74 years, the prevalence of disability rose considerably for both males and females. Activities were limited a lot for over 16% of this age group.</p> <p>In Croydon 2021 census data shows that 65+ year age group makes up 13.6% of the population which is higher than the London average at 11.9% although lower than nationally where 18.4% of the population are in this age group.</p>
Disability	Valid disabled blue badge holders will benefit from increased enforcement of the blue	Although the removal of Pay & Display machines should not affect disabled blue badge holders, who can park for unlimited	In Croydon 2021 data shows that of 32 London boroughs (plus City of London)

	<p>badge fraud which is having a negative impact on parking for genuine users.</p> <p>The proposed improved footway parking policy will benefit those with restricted mobility including those with walking aids including wheelchair users.</p> <p>Reviewing the times of the CPZs with likely increase in controlled hours should benefit blue badge holders who can park for up to 3 hours on a yellow line waiting restrictions and being able to park for unlimited time on Permit / Payment parking bays.</p>	<p>time on Permit / Payment bays, the removal may affect those disabled groups who may have restricted mobility but not necessarily qualify for a blue badge. There is more likelihood that they are more elderly and therefore less likely to have smart phones and find new technology more challenging.</p>	<p>Croydon is the 24<sup>th</sup> most disabled with 14% of the population classed as disabled under the Equality Act compared to a London average of 12.5%.</p> <p>Under the Equality Act day-to-day activities are limited a lot for 23,716 residents representing 6.1% of the population compared to 5.7% for London as a whole. Figures for day-to-day activities limited a little are 31,136 and 8% compared to 7.5% for London.</p>
Gender	<p>As above – all protected characteristic groups will benefit from tackling blue badge fraud, reducing obstructive footways and from funding for the freedom pass scheme.</p>		<p>Office for National Statistics using data from the 2021 census showed that after the ages of 70 to 74 years, the prevalence of disability rose considerably for both males and females. Activities were limited a lot for over 16% of this age group.</p> <p>In Croydon of the 390,719 population, 52% are females and 48% males compared to 51.5% and 48.5% respectively for London.</p>
Gender Reassignment	As above		
Marriage or Civil Partnership	As above		
Religion or belief	As above		
Race	As above		
Sexual Orientation	As above		
Pregnancy or Maternity	As above		

**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. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

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

**Table 2 – 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. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	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>

### 3.3 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 3 – 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	3	2	6
Disability	3	2	6
Gender	3	2	6
Gender reassignment	3	1	3
Marriage / Civil Partnership	3	1	3
Race	3	1	3
Religion or belief	3	1	3
Sexual Orientation	3	1	3
Pregnancy or Maternity	3	1	3



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### 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

**Important note:** Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

**Table 4 – 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 accessing some locations in the Borough where there are no Pay & Display machines for receiving payments for parking.	The program of phasing the removal of Pay & Display machines aims to mitigate the impact on the disabled people by initially retaining machines that are more likely to be used such as in town, district and local centres. Consideration is being given to	Jayne Rusbatch, Head of Highways and Parking	TBA

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		<p>PayPoint payments for parking on and close to high streets as an alternative to Pay by Phone.</p> <p>Please note that this is a living document and will be updated as we receive more information through the life of the project.</p>		
Race	There is no evidence that the removal of some Pay & Display machines will impact on different race groups.			
Sex (gender)	There is no evidence that the removal of some Pay & Display machines will impact on gender.			
Gender reassignment	There is no evidence that the removal of some Pay & Display machines will impact on gender reassignment.			
Sexual orientation	There is no evidence that the removal of some Pay & Display machines will impact on sexual orientation.			
Age	The removal of Pay & Display machines may have an impact on older residents, visitors and commuters who are less likely to have smart phones and may find this	The program of phasing the removal of Pay & Display machines aims to mitigate the impact on the elderly by initially retaining machines that are more likely to be used such as in	Jayne Rusbatch, Head of Highways and Parking	

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	technology more challenging than the younger population.	town, district, and local centres. Consideration is being given to PayPoint payments for parking on and close to high streets as an alternative to Pay by Phone.		
Religion or belief	There is no evidence that the removal of some Pay & Display machines will impact on religion or belief.			
Pregnancy or maternity	There is no evidence that the removal of some Pay & Display machines will impact on pregnancy or maternity.			
Marriage/civil partnership	There is no evidence that the removal of some Pay & Display machines will impact on marriage / partnership.			

### 6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter <b>X</b> in column 3 ( <b>Conclusion</b> ) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	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. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</b>	

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Adjust the proposed change	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>	X
Continue the proposed change	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>	
Stop or amend the proposed change	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.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Date:

## 7. Sign-Off

<b>Officers that must approve this decision</b>		
<b>Equalities Lead</b>	<b>Name: Denise McCausland</b>	<b>Date:13/07/23</b>
	<b>Position: Equality Programme Manager</b>	

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<b>Director</b>	<b>Name:</b> _____ <b>Date:</b> _____ <b>Position:</b> _____

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