

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	SUSTAINABLE COMMUNITIES, REGENERATION & ECONOMIC RECOVERY
Title of proposed change	PROPOSED PARKING CHARGE AMENDMENTS 2024 / 2025
Name of Officer carrying out Equality Analysis	David Wakeling – Parking Design Manager

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

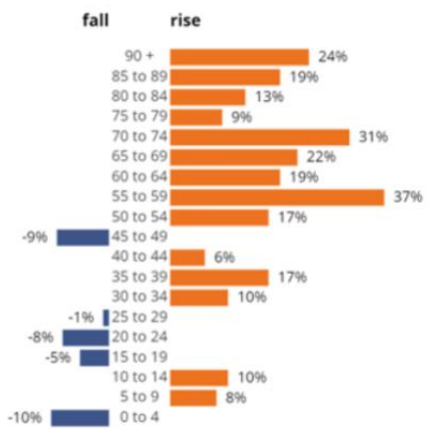
Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into 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</p>	<p>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 technology more challenging than the younger population.</p> <p>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 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</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> <p><u>Population change (%) by age group in Croydon 2011-2021</u></p>  <p>This is how Croydon compares. There has been an increase of 19.7% in people aged 65 years and over, an increase of 7.0% in people aged 15 to 64 years, and an increase of 1.9% in children aged under 15 years.</p>

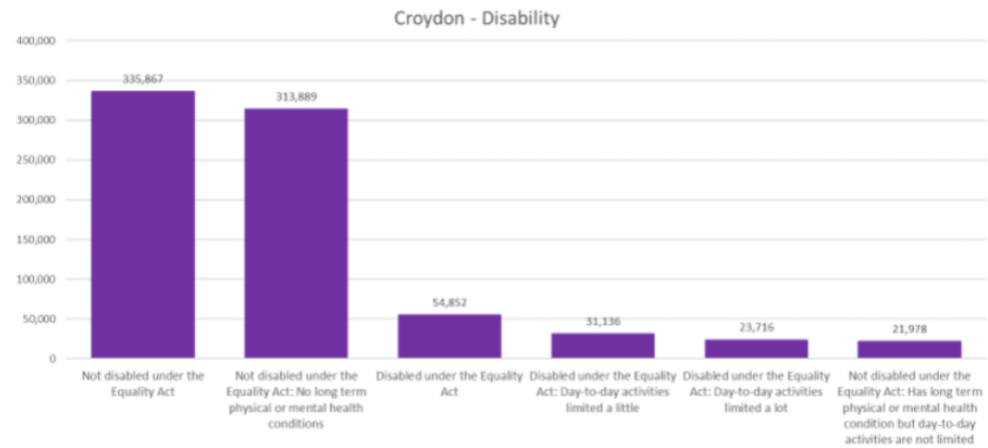
	<p>concessions such as the Freedom Pass scheme for the elderly. The parking permit charges therefore indirectly supports the portion of the elder population that do not have a car or who choose to use public transport</p>	<p>likely to have smart phones which make booking time by phone relatively easy 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.</p> <p>Update – Pay Point has now (as of January 2024) been introduced as an alternative method of payment in district and local centres for paying for and booking free parking sessions where appropriate for those without mobile phones.</p>	
<p>Disability</p>	<p>Valid disabled blue badge holders will benefit from increased enforcement of the blue 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</p>	<p>Although the removal of Pay & Display machines should not affect disabled blue badge holders, who can park for unlimited 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</p>	<p>In Croydon 2021 data shows that of 32 London boroughs (plus City of London) Croydon is the 24th 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>

walking aids including wheelchair users.

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.

they are more elderly and therefore less likely to have smart phones and find new technology more challenging.

Disability

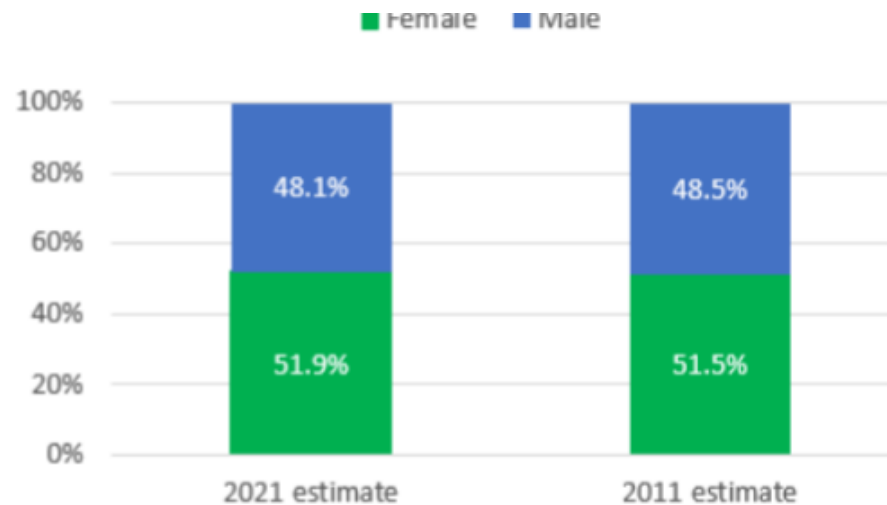


Gender

As above – all protected characteristic groups will benefit from tackling blue badge fraud, reducing obstructive footways and from funding for the freedom pass scheme.

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.

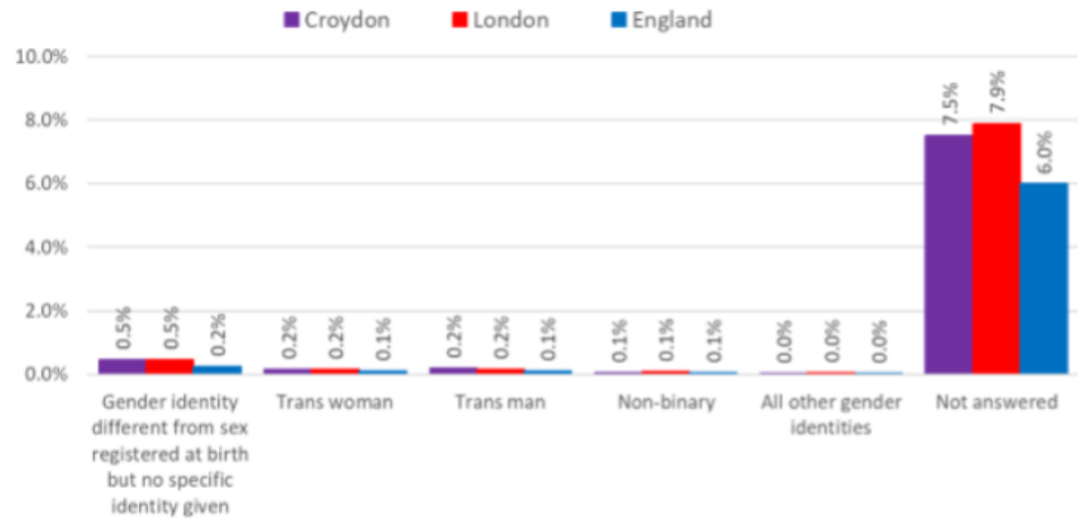
In Croydon of the 390,719 population, 52% are females and 48% males compared to 51.5% and 48.5% respectively for London.



Gender Reassignment

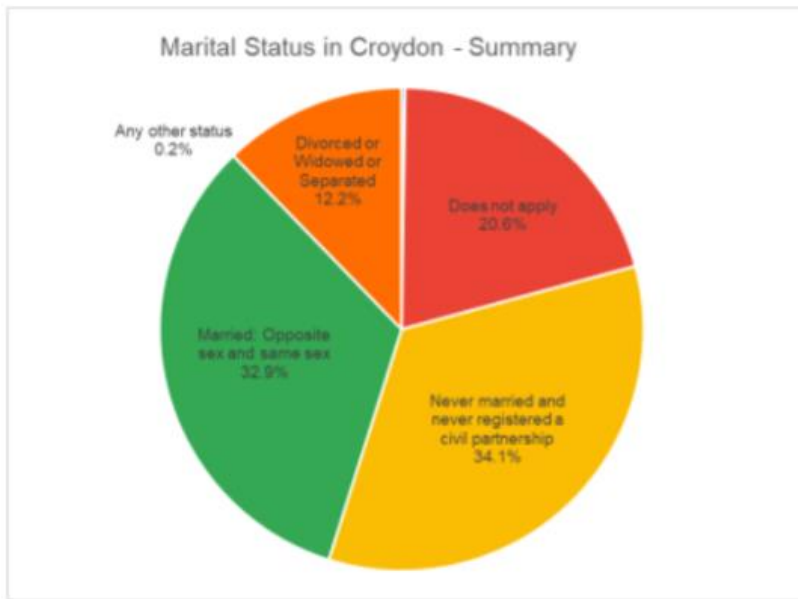
As above

Gender Identity (16 years or over)



Marriage or Civil Partnership

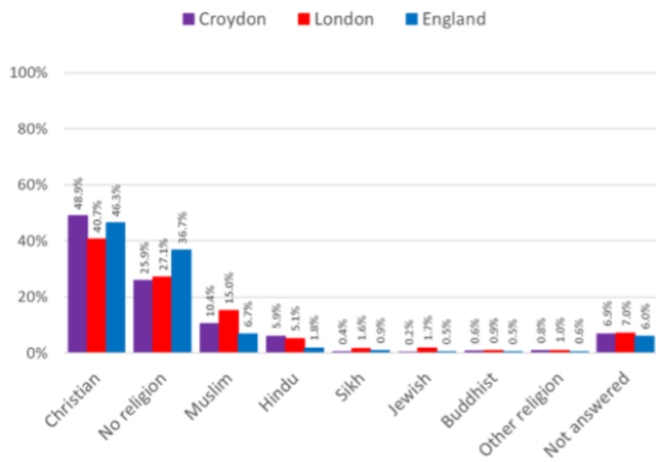
As above



Religion or belief

As above

Religions in Croydon compared to London and England

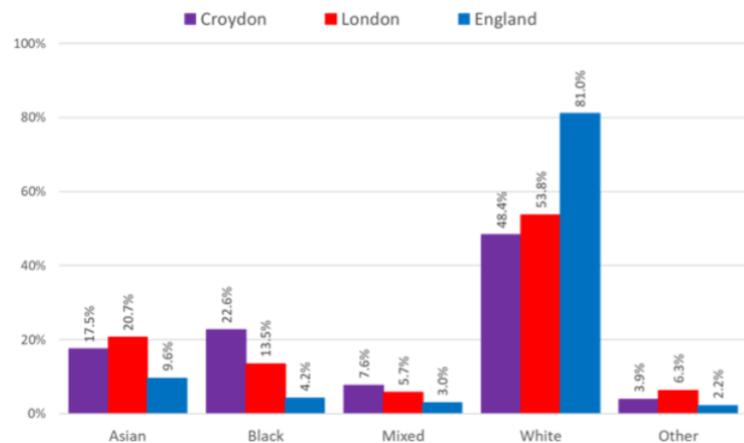


	Census 2021	Census 2011	Change
Christian	48.9%	56.4%	-7.5%
No religion	25.9%	20.0%	5.9%
Muslim	10.4%	8.1%	2.3%
Hindu	5.9%	6.0%	-0.1%
Sikh/Jewish/Other	1.4%	1.2%	0.2%
Buddhist	0.6%	0.7%	-0.1%
Not answered	6.9%	7.6%	-0.7%
TOTAL	100%	100%	

Race

As above

Broad Ethnic Groups – Croydon vs London vs England



- Less than half of the Croydon population is made up of residents from the White communities.
- The proportion of people from the Black and Mixed communities in Croydon is greater than in London and England.
- There is a much higher proportion of people from the White communities at the national level than in London and Croydon.

Sexual Orientation	As above		<p style="text-align: center;">Sexual Orientation (16 year or over)</p> <table border="1"> <caption>Sexual Orientation Data (16 year or over)</caption> <thead> <tr> <th>Sexual Orientation</th> <th>Croydon (%)</th> <th>London (%)</th> <th>England (%)</th> </tr> </thead> <tbody> <tr> <td>Straight or Heterosexual</td> <td>87.8%</td> <td>86.2%</td> <td>89.4%</td> </tr> <tr> <td>Gay or Lesbian</td> <td>1.5%</td> <td>2.2%</td> <td>1.5%</td> </tr> <tr> <td>Bisexual</td> <td>1.2%</td> <td>1.5%</td> <td>1.3%</td> </tr> <tr> <td>Pansexual</td> <td>0.3%</td> <td>0.4%</td> <td>0.2%</td> </tr> <tr> <td>Asexual</td> <td>0.0%</td> <td>0.0%</td> <td>0.1%</td> </tr> <tr> <td>Queer</td> <td>0.0%</td> <td>0.1%</td> <td>0.0%</td> </tr> <tr> <td>All other sexual orientations</td> <td>0.0%</td> <td>0.0%</td> <td>0.0%</td> </tr> <tr> <td>Not answered</td> <td>9.1%</td> <td>9.5%</td> <td>7.5%</td> </tr> </tbody> </table> <ul style="list-style-type: none"> • According to Census 2021 data, just under 9 in every 10 people are straight or heterosexual in Croydon, London and England. • Just under 1 in 10 did not answer the sexual orientation question in Croydon (9.1%) and London (9.5%). In England generally, 7.5% did not answer the question. • Of those who answered the question, the LGBT+ community amounted to 3.1% in Croydon, 4.3% in London and 3.2% in England. 	Sexual Orientation	Croydon (%)	London (%)	England (%)	Straight or Heterosexual	87.8%	86.2%	89.4%	Gay or Lesbian	1.5%	2.2%	1.5%	Bisexual	1.2%	1.5%	1.3%	Pansexual	0.3%	0.4%	0.2%	Asexual	0.0%	0.0%	0.1%	Queer	0.0%	0.1%	0.0%	All other sexual orientations	0.0%	0.0%	0.0%	Not answered	9.1%	9.5%	7.5%
Sexual Orientation	Croydon (%)	London (%)	England (%)																																				
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Not answered	9.1%	9.5%	7.5%																																				
Pregnancy or Maternity	As above		No data available on the Croydon Observatory																																				

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

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

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

Table 3 – Impact scores

Column 1 PROTECTED GROUP	Column 2 LIKELIHOOD OF IMPACT SCORE Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Column 3 SEVERITY OF IMPACT SCORE Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Column 4 EQUALITY IMPACT SCORE Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group. Equality impact score = likelihood of impact score x severity of impact score.
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 PayPoint payments for parking on and	Jayne Rusbatch, Head of Highways and Parking	Coin slots are being blanked over on Pay & Display machines from 5 March 2024 to be completed by 12 April 2024. Machines where the card readers are faulty are to be bagged by

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		<p>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> <p>Update – Pay Point has now (as of January 2024) been introduced as an alternative method of payment in district and local centres for paying for and booking free parking sessions where appropriate for those without mobile phones.</p>		<p>29 March with Pay Point information incorporated on temporary Corex Signs where practical.</p> <p>Pay Point as an alternative method of payment is being rolled out throughout the Borough in early March 2024.</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.			

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Age	<p>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 technology more challenging than the younger population.</p>	<p>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 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.</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> <p>Update – Pay Point has now (as of January 2024) been introduced as an alternative method of payment in district and local centres for paying for and booking free parking sessions, where appropriate for those without mobile phones.</p>	Jayne Rusbatch, Head of Highways and Parking	<p>Coin slots are being blanked over on Pay & Display machines from 5 March 2024 to be completed by 12 April 2024. Machines where the card readers are faulty are to be bagged by 29 March with Pay Point information incorporated on temporary Corex Signs where practical.</p> <p>Pay Point as an alternative method of payment is being rolled out throughout the Borough in early March 2024.</p>
Religion or belief	<p>There is no evidence that the removal of some Pay & Display machines will impact on religion or belief.</p>			
Pregnancy or maternity	<p>There is no evidence that the removal of some Pay & Display</p>			

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	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 X in column 3 (Conclusion) 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. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.	
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. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</p> <p>Consideration is being given to PayPoint payments for parking on and close to high streets as an alternative to Pay by Phone. Update – Pay Point has now (as of January 2024) been introduced as an alternative method of payment in district and local centres for paying for and booking free parking sessions, where appropriate for those without mobile phones.</p>	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. If you reach this conclusion, you should clearly	

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	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.	
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

Officers that must approve this decision	
Equalities Lead	Name: Helen Reeves Date: 08/03/24 Position: Interim Head of Strategy & Policy
Director	Name: Date: Position: