

Equality Analysis Form

Delivering for Croydon

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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 2019 – 2022 that is intended to effectively manage parking provision across the borough in line with the Corporate Plan and the borough’s growth objectives. This EA is a living document, which will be revised as the projects develop and further engagement and/or consultation is conducted as necessary to review the impacts on equalities, during the policy period. 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. A second 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. The current revision incorporates details and refinements resulting from developing the emission-based parking permit charges and school street decision reports.

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.

On 08 July 2019, Cabinet resolved to recommend that Council (on 15 July 2019) declare a ‘Climate Emergency’ and note the need for urgent action at an international, national and local level.

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.

1. Equality Act 2010

Section 149 of the Equality Act 2010 sets out the Council's public sector equality duty (PSED). It provides as follows:

- 1.1 A public authority must, in the exercise of its functions, have due regard to the need to:
 - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 1.2 Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—
 - (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
 - (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- 1.3 The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.
- 1.4 Having due regard to the need to foster good relations between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to—
 - (a) tackle prejudice, and

(b)promote understanding.

1.5 Compliance with the duties in section 149 may involve treating some persons more favourably than others; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

1.6 The relevant protected characteristics are—

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

2 Parking policy engagement analysis

The analysis of the engagement response to the then draft Parking Policy in April 2019 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.

Of particular interest in relation to the current scrutiny call in was the outcome in relation to Section 5, Parking Charges. Of the respondents to this section, the disabled group showed some elevated level of concern for parking charges however, members will note that blue badge holders are exempt from parking charges as detailed more fully below. For members' information, Emission-based parking permit charges were specifically described within both the then draft parking policy, the Cabinet report and the Get Involved survey site for the engagement.

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

The feedback received to the then draft Parking Policy were addressed by action points on the actions plan section of the Equalities Analysis and incorporated into the final policy implemented from 7th August 2019.

3 Emission-based parking permit charges consultation analysis

The analysis of the statutory consultation on the emission-based parking permit charges (which closed on 20th June 2019) found that 154 of 1,149 respondents (13%) were concerned that the emission-based charges could be unfair to those who cannot afford a newer car, which includes the poorest, elderly and vulnerable. Several respondents detailed example personal circumstances. The following considerations were made and reflected in the key decision report:

- 3.1 In relation to the PSED compliance and any potential concerns of a disproportional impact on vulnerable residents and those least able to fund a newer car, the following protected characteristics are identified in the Equalities Assessment as most relevant in relation to the proposal:
- Disability.
 - Age.
 - Pregnancy and maternity.

Section 3.4 describes how each of the above groups may be impacted, and mitigations for such impacts are detailed over sections 3.5 – 3.8 below.

- 3.2 Other protected characteristics, as per Equality Act 2010 section 149(7), are considered to be less impacted by emission based permit parking charges, and these include gender reassignment, race, religion or belief, sex and sexual orientation. The responses to the consultation on emissions based parking permit charges did not raise any concerns from these groups.

- 3.3 It is considered that the Council's fulfilment of the PSED duty is promoted by these measures as detailed under the following categories:
1. Addressing poor air quality and disproportionate impact on the more vulnerable residents.
 2. Accessibility to the permit application process.
 3. Cost/charge for parking a car in a CPZ.

4. Unavailability of space to park a car in a CPZ.

Addressing poor air quality and its disproportionate impact on the more vulnerable residents

3.4 Air pollution is of increasingly higher importance as a public health issue. Air pollution contributes 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 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. Figure 1 shows how the majority of highly polluted areas are situated within CPZs.

There is a disproportionately high overlap between the CPZ areas and poor living environment, of which air quality is a significant factor (see Figure 2). The CPZs coincide disproportionately with the areas of elevated risk of premature death and the impairment of quality of life due to poor health.

Croydon currently has the highest rate of hospital admissions for childhood (0-9 years) asthma and the third highest number of asthma deaths in London. The population density of children aged under 4 is disproportionately higher within the CPZ areas, in particular in the North zones.

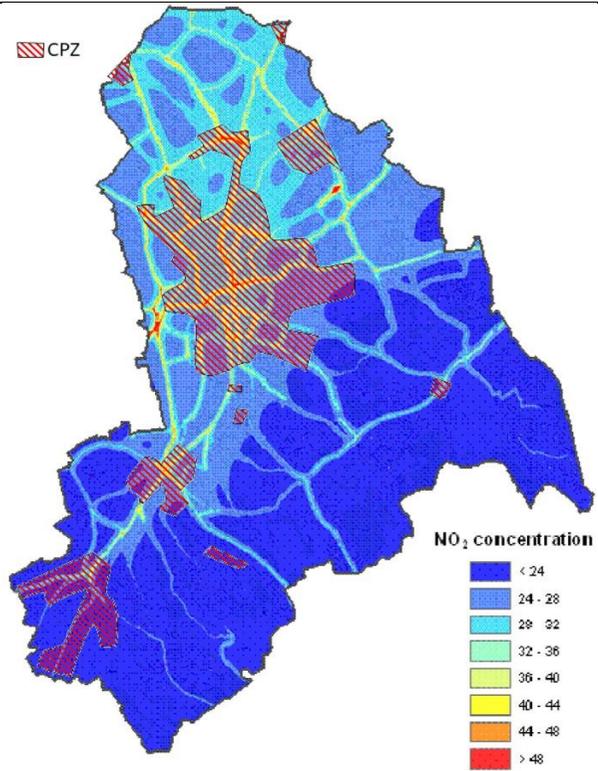


Figure 1 – CPZ areas overlapped with predicted areas of Croydon breaching annual average nitrogen dioxide air quality objective (40µg/m³) in 2015.
(source: *Air Quality Action Plan, 2017*)

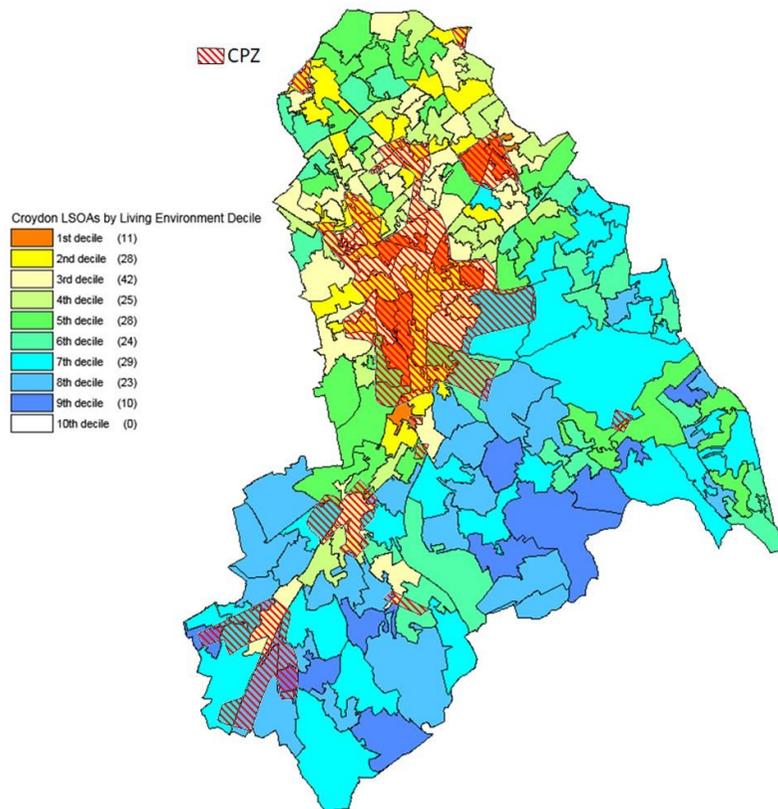


Figure 2 – CPZ areas overlapped with the living environment domain, looking at both the indoor living environment and the outdoor living environment, including air quality.
(source: www.croydonobservatory.org)

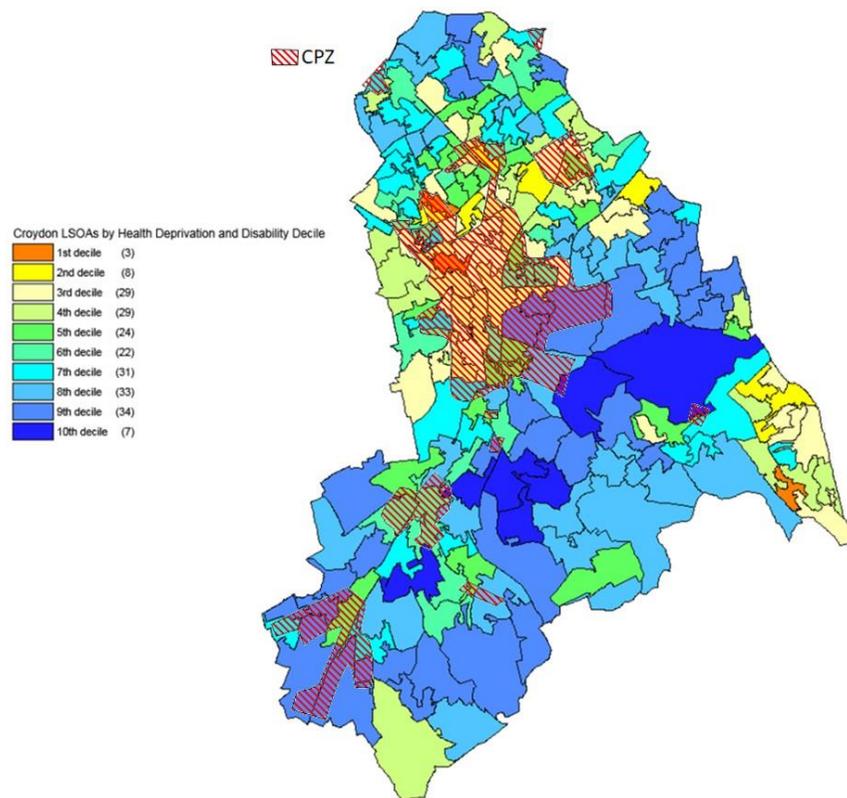


Figure 3 – CPZ areas overlapped with health deprivation and disability, based on the risk of premature death and the impairment of quality of life due to poor mental or physical health.
 (source: www.croydonobservatory.org)

% of population who are 0-4
2016 Mid Year Estimates

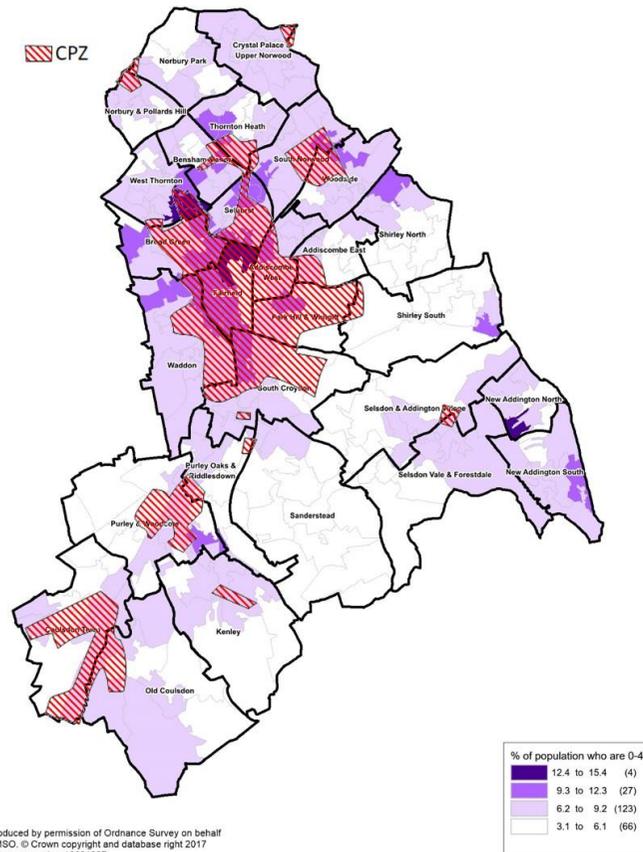


Figure 4 – CPZ areas overlapped with density 0 - 4 year olds.
(source: www.croydonobservatory.org)

An estimated 205 deaths in Croydon are linked to air pollution. By comparison, to put the public health issue into perspective, 493 deaths in 2008 were attributed to smoking. [source: Croydon Health And Wellbeing Board, Joint health and wellbeing strategy 2013-2018].

In Croydon an Air Quality Management Area (AQMA) has been declared for the whole of the borough, for failing to meet the EU annual average limit for air pollutants. The national Clean Air Strategy 2019 and the London Mayor's Strategy require actions to reduce NOx and particulate matter emissions mainly at a local level. These actions are required to start showing results by 2021. If parking charges were to be maintained at a lower level, then it is considered unlikely to influence a sufficient number of owners in their next car choices

or indeed choices to have two or more vehicles and this in turn would impact negatively on the overarching objectives. Residents and local businesses for whom parking and road congestion have adverse economic and quality of life implications include people who cannot immediately afford to replace their older cars.

Active encouragement of lower emission vehicles and the underlying reduction in car use, benefits all individuals at risk of respiratory illnesses and exacerbation. This can help improve the ability of certain protected groups to travel and participate where participation is currently disproportionately low as stated in the Equality Act 2010 as a Public sector equality duty. It would enable persons from all protected groups to breathe cleaner and safer air.

Accessibility to the permit application process

- 3.5 The proposal does not alter the present process for obtaining a parking permit, which has evolved and is demonstrated to be accessible over at least a decade. The emission-charge calculation is automated upon entering the vehicle's registration number as is already required in the present system. Residents who are unable to make the application online have the option to telephone or use the walk-in Access Croydon service.

Cost/charge for parking a car in a CPZ

- 3.6 CPZs represent the roads with high demand for parking spaces and have been introduced to better manage the availability of kerb-space for residents and visitors. Charges are set as a means to help achieve this.
- 3.7 All 11,459 individual and 71 organisational blue badges holders in Croydon are exempt from the proposed parking charges. Disabled companion badges and CNCA permits, as detailed in section 3 above, are also free-of-charge. The permit charges for other charities are substantially discounted to levels that are below the resident permit charges.

In addition, some essential drivers have access to Personal Independence Payment (PIP), which is a benefit that helps with the extra costs of a long-term health condition or disability for people aged 16 to 64. The PIP, or DLA, motoring allowance is currently £61.20 per week (£68.35 for war pensioners), as help with extra costs that are faced as result of disabilities and is to cover the cost of a Motability lease agreement for an essential vehicle (or powered wheelchair/scooter). Therefore there is no need to necessarily fund a newer car.

With regards to persons with protected characteristics who are not eligible for a disabled blue badge or a motoring PIP, which includes the scenario of someone who must obtain and use a car as direct consequence of advanced age, pregnancy or maternity, the permit charge will remain a relatively modest element of the typical c.£2,000 to £4,000 total yearly cost of car ownership (www.motoringresearch.com/car-news/average-car-costs-a-month).

Table 1 – Effects of the proposal on the total cost of car ownership. The change is relative to the existing permit charge of £80:

Proposed emission band	Proposed permit charge	Change in permit charge	Effect on car ownership cost
Band 1	£6.50	-£73.50	-3.7% to -1.8%
Band 2	£65	-£15	-0.7% to -0.4%
Band 3	£104	+£24	0.6% to 1.2%
Band 4	£146	+£66	1.7% to 3.3%
Band 5	£300	+£220	5.5% to 11%

The forecast model based on assumptions of changing car ownership, shows an overall net increase of 13.5% in permit income is expected. This remains less than the 15% ONS Retail Price Index increase, and to note that permit charges in Croydon have not been changed in over 6 years since 2013. Compared to all other associated costs of owning a car, permit charges would be a minimal percentage of the overall cost. The proposed charges do not therefore significantly reduce the opportunities for persons who share protected characteristics and who are ineligible for a disabled blue badge.

With regards to maternity: Where a child has a special transport needs then they would typically be entitled to a blue badge, making the parent's car eligible for a companion badge, which exempts the parent's car from parking charges both at home and at destinations within Croydon.

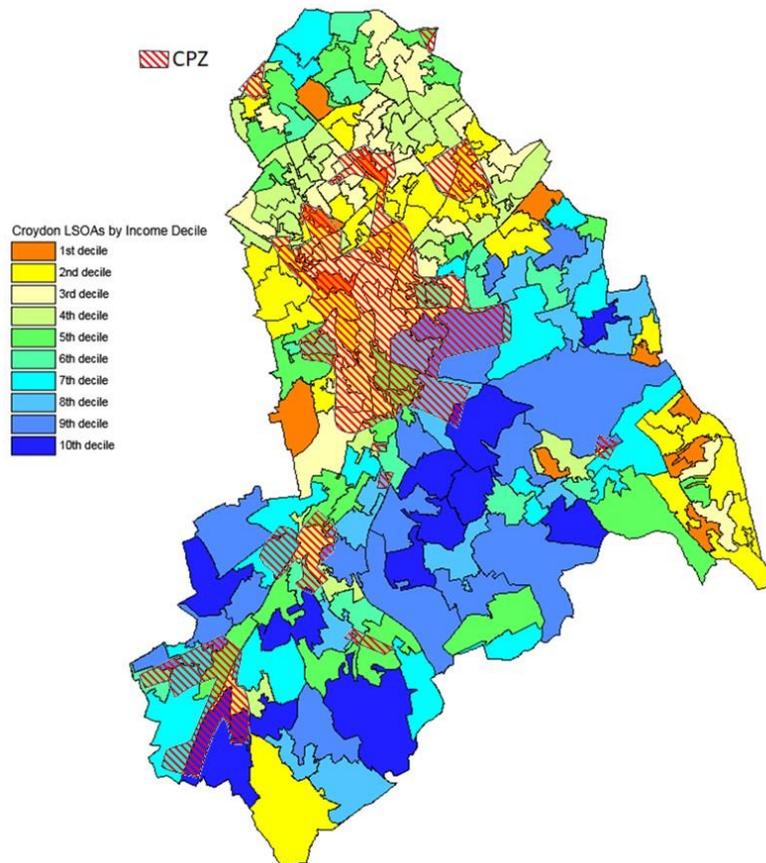


Figure 5 – CPZ areas overlapped with income domain, looking at the proportion of the population who are either out of work or who have low earnings. The orange areas are in the top 10% most deprived areas in the country and together make up 5% of the total areas in the borough. Majority of orange areas are outside the CPZ, with the noticeable exceptions of the North Zone CPZ in Broad Green and Thornton Heath.

(source: www.croydonobservatory.org)

Figure 5 shows that although some CPZ areas overlap with low income domains, this is not the case for all CPZ areas. An estimation based on Figure 5 is that about a third of low income domains are within CPZs.

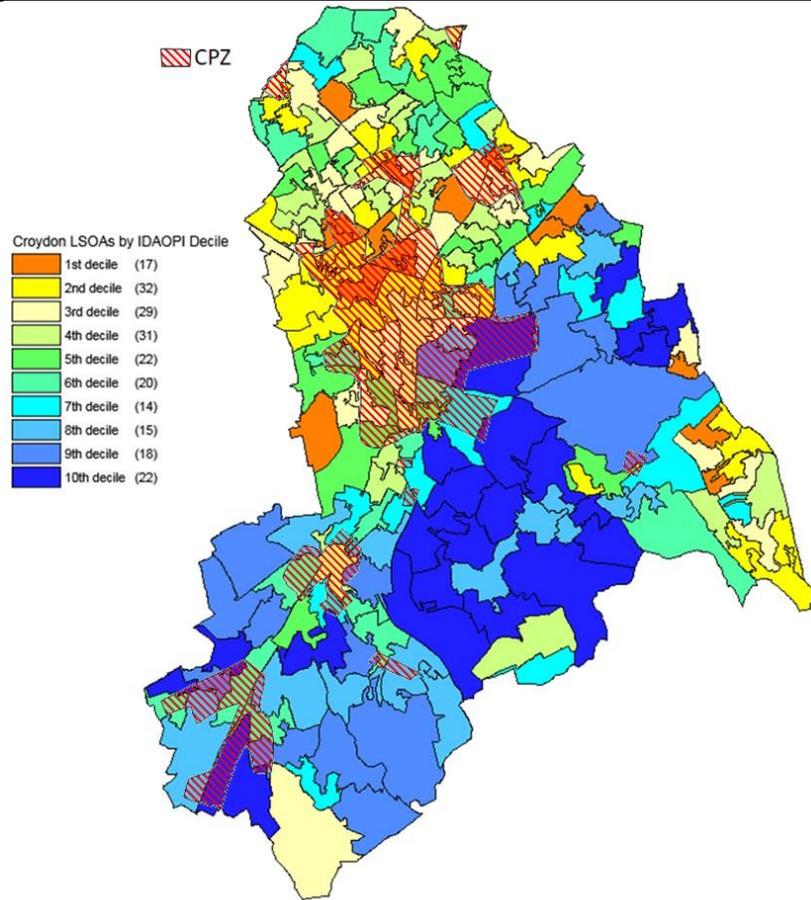
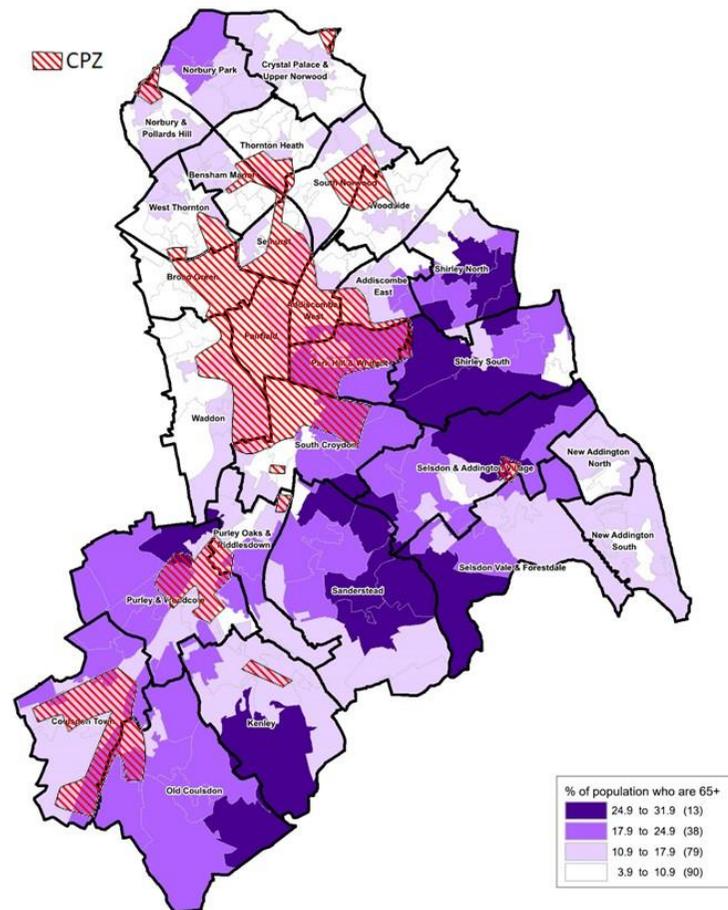


Figure 6 – CPZ areas overlapped with income deprivation amongst the over 60-year olds.
 (source: www.croydonobservatory.org)

**% of population who are 65+
2016 Mid Year Estimates**



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Figure 7 – CPZ areas overlapped with density of over 65-year olds.
(source: www.croydonobservatory.org)

In Croydon 17% of older people are considered to be income deprived (source: www.croydonobservatory.org). Figure 6 indicates that older people living in CPZ areas are disproportionately deprived. Figure 7, however, indicates that the older population is significantly lower within CPZ areas.

In context of the 148,256 vehicles registered in Croydon, the higher £300 band on resident permits accounts for 371 vehicles (i.e. c.4% against all resident permits issued) in the highest emission group and 413 that predate Mar 2001 (i.e. c.4.5% against all resident permits issued). These are issued to residents across the whole income spectrum. Proportionally, the higher charge will apply to a very small number of residents on low income.

Unavailability of space for parking a car in a CPZ

- 3.8 Since the permit charges were last reviewed in 2013 there has been a 7% growth in the number of vehicles registered in Croydon. This has meant that there is an increasing pressure for parking spaces and vehicle drivers have become desensitised to the charges applied, hence reducing the effectiveness of charges to manage demand. The permit charges set in 2013 are currently too low for achieving the parking demand management objectives. This is evident from the Parking Policy engagement where many who declared a disability stated it is too difficult to find a parking space near to home.

Influencing the overall number of cars parked on the roads in the borough, and in parking congested CPZ in particular, can help improve access for all protected groups with essential car needs, hence improve their ability to travel and participate and thereby advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share such characteristics thus supporting the Council's public Sector equality duty.

4 SUMMARY

- 4.1 There is no evidenced information that the emissions based parking permit charges will have a disproportionate impact on people with protected characteristics (as covered by the Equality Act).
- 4.2 Whilst those on lower incomes will not be in a position to replace their vehicles with new ones, being on a low income is not alone a protected characteristic.
- 4.3 In the context of car parking in permit zones and the proposed emission-based parking permit charges, the Equalities Assessment concludes that there are no adverse PSED impacts as a result of this decision. In summary one of the main purposes of the decision is to support the health and wellbeing of residents of the borough with a particular focus on those most susceptible to air pollution. The majority of CPZ's are located in areas more affected by pollution, as detailed below, and therefore impact on areas to which the proposed emission based charges will apply. As such, it is considered that the proposed decision has a positive impact on the duty to seek to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act. In addition, as many of the areas most affected by pollution are those which correspond with areas of deprivation in the borough and the majority of CPZ's are similarly located in those areas this decision will seek to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and afford a better air quality and level of health across more

areas of the borough. The Equalities assessment also concludes that this decision will not have any adverse impact on the fostering of good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 4.4 It is not considered that the proposed charges significantly reduce the opportunities for persons who share protected characteristics and who are not eligible for a disabled blue badge. The proposal on balance helps to reduce inequality for those persons who share protected characteristics, in particular for those who are vulnerable to air pollution and who have difficulties accessing their homes and travelling to other destinations, which disproportionately are the young, the elderly and those who live in some of the poorest areas of the borough. The proposal in effect supports the Council in its duty under the Equality Act 2010.
- 4.5 The many respondents to the parking policy engagement (183) and the emission-based parking permit charges consultation (1,149) have not suggested any alternative solution, which could sufficiently address equality and air quality objectives, without the introduction of a permit charges differential.
- 4.6 Surplus from parking permit charges are 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, and incidentally, support the portion of the elder population that do not have a car or who choose to use public transport.
- 4.7 The emission-based parking permit charges will effectively address inequality issues, by helping to encourage a gradual switch to lesser polluting cars and also help influence the choices of those who are able to give up a car.

For detailed information on consultation responses 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	<p>Positive – as aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.</p> <p>Surplus from parking charges are 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>Public Health (NHS) data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London. 7.5% of premature deaths in Croydon are linked to air pollution. Failing</p>	<p>Potential negative impact for older age group due to frailty.</p> <p>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.</p>	Air Quality Action Plan 2017-22

	to address NOx and particulate matter emissions in Croydon would deprive many local people of their fundamental right to safe air.		
Disability	<p>Positive – as aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.</p> <p>Positive – the policy can potentially enhance accessibility.</p>	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 to a reduction in air pollution in a person's health.	<p>Air Quality Action Plan 2017-22</p> <p>Blue Badge Scheme</p> <p>Croydon Observatory</p> <p>Disabled Parking Accreditation scheme, in association with Disabled Motoring UK.</p>
Gender	Positive – as aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges 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 and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges 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 and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges 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 and reduce exposure to air pollution and reduce the damaging impact that air pollution has on		Air Quality Action Plan 2017-22

	public health and public health challenges for all residents and visitors by implementing parking related measures.		
Race	Positive – as aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges 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 and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges 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 and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.	Potential negative impact on parents during 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

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 5 – Impact scores

<p>Column 1</p> <p>PROTECTED GROUP</p>	<p>Column 2</p> <p>LIKELIHOOD OF IMPACT SCORE</p> <p>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.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Column 3</p> <p>SEVERITY OF IMPACT SCORE</p> <p>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.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Column 4</p> <p>EQUALITY IMPACT SCORE</p> <p>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.</p> <p>Equality impact score = likelihood of impact score x severity of impact score.</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

Equality Analysis

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. The proposed scheme has concessions for Blue Badge holders and care charities. The Blue Badge, its companion badge and non-vehicle	Parking	BY Nov 2019 Upon adoption of the Parking Policy

Equality Analysis

		<p>specific charity badges for volunteers who visit vulnerable residents are exempt from parking charges. The holders of 11,459 individual and 71 organisational blue badges issued in Croydon are exempt from the parking charges.</p> <p>Specifically, some essential drivers have access to Personal Independence Payment (PIP), which is a benefit that helps with the extra costs of a long-term health condition or disability for people aged 16 to 64.</p> <p>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</p>		
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

Equality Analysis

		<p>Where a child has a special transport needs then they would typically be entitled to a blue badge, making the parent's car eligible for a companion badge, which exempts the parent's car from parking charges both at home and at destinations within Croydon.</p> <p>Surplus from parking charges are 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>		
Religion or belief				
Pregnancy or maternity	Potential negative impact on parents during pregnancy from the driving restrictions on School Streets	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>Residents and local businesses for whom parking and road congestion have adverse economic and quality of life implications include people who cannot immediately afford to replace their older cars. We must also consider fairness to residents who are vulnerable to air pollution, which disproportionately are the young, the elderly and those who live in some of the poorest areas of the borough. They represent groups that tend to have lower car ownership.</p> <p>The forecast model based on assumptions of changing car ownership, shows an overall net increase of 13.5% in permit income is expected. This remains less than the 15% ONS Retail Price Index increase, and to note that permit charges in Croydon have not been changed in over 6 years since 2013. Compared to all other associated costs of owning a car, permit charges would be a minimal percentage of the overall cost.</p>	X

Equality Analysis

	<p>In context of the 148,256 (in 2016) vehicles registered in Croydon, the higher £300 band on resident permits accounts for 371 vehicles in the highest emission group and 413 that predate Mar 2001. This equates to 8.7% of all active resident parking permits (9,048) as at the end of 2018, which are issued to residents across the whole income spectrum. Proportionally, the higher charge will apply to a very small number of residents on low income. The proposed charges can therefore not be generalised as having a disproportionate effect on residents with low income.</p> <p>Influencing the overall number of cars parked on the roads in the borough, and in parking congested CPZ in particular, can help improve access for all protected groups with essential car needs, hence improve their ability to travel and participate where participation is currently disproportionately low.</p> <p>Active encouragement of lower emission vehicles and the underlying reduction in car use, benefits all individuals, families and neighbourhoods. Air pollution 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.</p> <p>There is no evident information to suggest that the emissions based parking permit charges will have a disproportionate impact on people with protected characteristics (as covered by the Equality Act). Whilst those on lower incomes will not be in a position to replace their vehicles with new ones, being on a low income is not alone a protected characteristic.</p> <p>It is considered that the reasons for introducing emissions-based parking charges outweighs the reasons for not implementing them.</p> <p>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</p>	
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>	
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. If you reach this conclusion, you should clearly</p>	

Equality Analysis

	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:	
This decision will be considered after a formal consultation.	TBC after consultation but by October 2019	

7. Sign-Off

Officers that must approve this decision			
Equality lead	Name: Yvonne Okiyo	Date: 28.08.2019	
	Position: Equalities Manager		
Director	Name: Steve Iles	Date: 28.08.2019	
	Position: Director of Public Realm, Place		