

Equality Impact Analysis Screening Tool

Section 1: Introduction

Name of proposal
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
Air Quality Action Plan 2022-2027
Service area and Directorate responsible
Environmental Health & Trading Standards, Place directorate
Name of completing officer
Muhammad Islam
Head of Service
David Tolley

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between those with 'protected characteristics' and those without them
- Foster good relations between those with 'protected characteristics' and those without them

This Equality Impact Analysis provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above. For more information about the Council's commitment to equality, please visit the Council's [website](#).

Section 2: Summary of proposal being screened

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010
The Council has a statutory duty to comply with the Local Air Quality Management (LLAQM) Regime under the Environment Act 1995. This includes reviewing the quality of air in the borough and declaring an air quality management area (AQMA) when legal standards and objectives are

being exceeded. Tower Hamlets was declared an AQMA in 2000 and subsequently adopted an Air Quality Action Plan (AQAP). As the current AQAP expires in October 2022, there is a duty to update it. The AQAP 2022-2027 sets out the actions/measures the council will take to improve air quality in the borough for all residents, visitors, and businesses. The AQAP is a statutory document.

Short and long-term exposure to air pollution can lead to a wide range of harmful effects including cardiovascular and respiratory diseases e.g., asthma, lung cancer, dementia, and diabetes. Children, the elderly, and those with pre-existing conditions are particularly vulnerable. People on low incomes or from ethnic minorities are also more affected by poor air quality, partly because they often live in the more polluted areas.

Therefore, the most relevant characteristics are age, race, and disability.

Section 3: Equality Impact Analysis screening

<p>Is there a risk that the policy, proposal or activity being screened disproportionately adversely impacts (directly or indirectly) on any of the groups of people listed below?</p> <p>Please consider the impact on overall communities, residents, service users and Council employees.</p> <p>This should include people of different:</p>	Yes	No	Comments
<ul style="list-style-type: none"> ▪ Sex 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The actions and measures in the AQAP do not specifically target one gender. Therefore, it is considered the impact of the actions would be neutral on gender</p>
<ul style="list-style-type: none"> ▪ Age 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Poor air quality has a negative effect on the young and the elderly. Research has shown children have reduced or stunted lung growth due to air pollution. Implementing the measures in the AQAP will have positive beneficial effect on all age groups but particularly children and the elderly</p>
<ul style="list-style-type: none"> ▪ Race 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Tower Hamlets is one of the London boroughs with the highest numbers of people living in London's worst air quality areas and the highest proportion of most</p>

			deprived populations (top 30%) in London's areas of worst air quality. Studies have shown strong correlation between deprivation and air pollution. People from the BAME community are more likely to be living in areas of high pollution. The AQAP sets out measures to improve air quality over the next 5 years and will have a positive beneficial effect on all residents of the borough.
<ul style="list-style-type: none"> ▪ Religion or Philosophical belief 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Measures in the AQAP do not target a specific religion or belief system; therefore, it is considered there should be no disproportionate impact. Residents and visitors to the borough of all religion and none will benefit from improvement to air quality.
<ul style="list-style-type: none"> ▪ Sexual Orientation 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The AQAP is intended for all residents of the borough regardless of their sexual orientation. All residents and visitors to the borough should benefit from the improvements in air quality and reduction in exposure to pollution.
<ul style="list-style-type: none"> ▪ Gender re-assignment status 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No specific issues were raised around this protected characteristic during the public consultation. It is considered measures in the AQAP will improve air quality for all in the borough regardless of gender re-assignment status.
<ul style="list-style-type: none"> ▪ People who have a Disability (physical, learning difficulties, mental health and medical conditions) 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	People with existing -medical conditions such as heart and respiratory conditions are disproportionately impacted by poor air quality requiring additional medical care and hospitalisation and mortality. Research also shows air pollution can contribute to a decline in mental ability and dementia in older people. Improving the quality of air will have a positive beneficial effect on this group. The AQAP proposes provision of infrastructure to support walking and cycling. These highway Improvements would likely improve the ability for those with physical disabilities to travel through the borough. No negative impact is considered to arise on those with mental

			disabilities. There is however a beneficial effect expected from improved air.
<ul style="list-style-type: none"> ▪ Marriage and Civil Partnerships status 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Measures in the AQAP will improve air quality for all in the borough regardless of marital or civil partnership status
<ul style="list-style-type: none"> ▪ People who are Pregnant and on Maternity 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Long-term exposure to air pollution is associated with low birth weight, which leads to a higher risk of a range of complications and long-term health effects. Pregnant women like all residents and visitors to the borough would benefit from the resultant improvements in air quality and reduction in exposure to pollution.
<p>You should also consider:</p> <ul style="list-style-type: none"> ▪ Parents and Carers ▪ Socio-economic status ▪ People with different Gender Identities e.g. Gender fluid, Non-binary etc. ▪ Other 	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

If you have answered **Yes** to one or more of the groups of people listed above, a **full Equality Impact Analysis is required**. The only exception to this is if you can 'justify' the discrimination (Section 4).

Section 4: Justifying discrimination

Are all risks of inequalities identified capable of being justified because there is a:	
(i) <i>Genuine Reason</i> for implementation	<input type="checkbox"/>
(ii) The activity represents a <i>Proportionate Means</i> of achieving a <i>Legitimate Council Aim</i>	<input type="checkbox"/>
(iii) There is a <i>Genuine Occupational Requirement</i> for the council to implement this activity	<input type="checkbox"/>

Section 5: Conclusion

Before answering the next question, please note that there are generally only two reasons a full Equality Impact Analysis is not required. These are:

- The policy, activity or proposal is likely to have **no or minimal impact** on the groups listed in section three of this document.
- Any discrimination or disadvantage identified is **capable of being justified** for one or more of the reasons detailed in the previous section of this document.

Conclusion details

Based on your screening does a full Equality Impact Analysis need to be performed?

Yes	No
<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you have answered **YES** to this question, please complete a full Equality Impact Analysis for the proposal

If you have answered **NO** to this question, please detail your reasons in the 'Comments' box below

Appendix 3

Comments

Implementation of the actions/measures set out in the AQAP will have an overall positive beneficial effect on residents, visitors, and businesses in the borough through reduction of emissions and exposure regardless of their protected characteristics. It is expected the young, elderly, ethnic minorities and people with pre-existing medical conditions will particularly benefit.