

# Equality Analysis (EA)

Financial Year  
**2016/17**

See Appendix  
**A**

Current decision  
rating



## Section 1 – General Information (Aims and Objectives)

Name of the proposal including aims, objectives and purpose

*(Please note – for the purpose of this doc, 'proposal' refers to a policy, function, strategy or project)*

### Controlled Parking Zone and Parking Policy Review (2016)

A full review of all existing parking policies has been conducted in order to ensure that services provided are open, transparent, fair and consistent, and that they support the Mayor's and Council's transport priorities and plans.

The review has raised a number of issues that require senior manager and Member input prior to decisions being taken at Cabinet. In some cases, decisions are required on proposed amendments to existing formal policies. In other cases, the creation of additional formal policies is required to address issues that are currently being dealt with on a temporary basis.

### Conclusion - To be completed at the end of the Equality Analysis process

*(the exec summary will provide an update on the findings of the EA and what outcome there has been as a result. For example, based on the findings of the EA, the proposal was rejected as the impact on a particular group was unreasonable and did not give due regard. Or, based on the EA, the proposal was amended and alternative steps taken)*

**Name:** Mirsad Bakalovic  
(signed off by)

**Date signed off:**  
(approved)

Service area:  
Parking & Mobility Services

Team name:  
Business Team

Service manager:  
Mirsad Bakalovic

Name and role of the officer completing the EA:  
Colin Sims, Senior Parking Business Officer

## Section 2 – Evidence (Consideration of Data and Information)

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

- Service user levels

- Benchmarking from neighbouring and similar London local authorities
- LBTH demographics
- Complaints

In 2015-16, 1,649 Penalty Charge Notices were cancelled automatically under the first cancellation policy.

Equalities data of Persistent Evaders are unavailable.

### **Section 3 – Assessing the Impacts on the 9 Groups**

Please refer to the guidance notes below and evidence how you're proposal impact upon the nine Protected Characteristics in the table on page 3?

**For the nine protected characteristics detailed in the table below please consider:-**

- **What is the equality profile of service users or beneficiaries that will or are likely to be affected?**

Use the Council's approved diversity monitoring categories and provide data by target group of users or beneficiaries to determine whether the service user profile reflects the local population or relevant target group or if there is over or under representation of these groups

- **What qualitative or quantitative data do we have?**

List all examples of quantitative and qualitative data available  
(include information where appropriate from other directorates, Census 2001 etc)

- *Data trends – how does current practice ensure equality*

- **Equalities profile of staff?**

Indicate profile by target groups and assess relevance to policy aims and objectives e.g. Workforce to Reflect the Community. Identify staff responsible for delivering the service including where they are not directly employed by the council.

- **Barriers?**

What are the potential or known barriers to participation for the different equality target groups? Eg- communication, access, locality etc.

- **Recent consultation exercises carried out?**

Detail consultation with relevant interest groups, other public bodies, voluntary organisations, community groups, trade unions, focus groups and other groups, surveys and questionnaires undertaken etc. Focus in particular on the findings of views expressed by the equality target groups. Such consultation exercises should be appropriate and proportionate and may range from assembling focus groups to a one to one meeting.

- **Additional factors which may influence disproportionate or adverse impact?**

Management Arrangements - How is the Service managed, are there any management arrangements which may have a disproportionate impact on the equality target groups

- **The Process of Service Delivery?**

In particular look at the arrangements for the service being provided including opening times, custom and practice, awareness of the service to local people, communication

Please also consider how the proposal will impact upon the 3 One Tower Hamlets objectives:-

- Reduce inequalities
- Ensure strong community cohesion
- Strengthen community leadership.

Target Groups	Impact – Positive or Adverse	Reason(s)
Race	Neutral	<p>The recommended options of the various policy amendments and new policies will not adversely affect this group due to its characteristics.</p> <p>The service will monitor the equalities characteristics of people who were affected by this proposal, where possible.</p>
Disability	Neutral	<p><u>PCN Cancellations for Blue Badge Holders</u></p> <p>The first PCN to vehicles in contravention that are displaying valid Blue Badges is no longer cancelled automatically, but that representations are assessed on a case-by-case basis. Also, a warning notice (no penalty) is issued instead of a PCN where the vehicle is seen in contravention within seven days of the expiry of the Blue Badge.</p> <p>There is an inconsistency between enforcement of vehicles displaying permits and vehicles displaying Blue Badges. Complaints have been received from permit holders that their first PCN has not been cancelled when they are aware that a Blue Badge holder’s first PCN will be cancelled, and they consider this to be inconsistent and unfair. This new proposal will introduce a consistent enforcement policy, which will further promote cohesion in the Borough.</p> <p>There is no evidence to suggest that Blue Badge holders are less able to abide by parking restrictions than able-bodied drivers who might contravene the parking restrictions. As a result, the current policy could be interpreted as either perpetuating the discriminatory notion that people with physical disability are less able to make value judgements or, conversely, that the position discriminates against able bodied permit holders or drivers using pay &amp; display. The proposal will eliminate such a possibility.</p>

		<p><u>Surcharges for Households Requesting Multiple Resident Permits</u>  It is recommended that resident permits issued free of charge to Blue Badge holders should be excluded from counting toward the surcharge but should be included in counting toward the total number of permits allowed per household. This means that no household will have to pay for more permits issued as a result of the applicant holding a Blue Badge and that no household will be affected by the three-permit limit.</p>
Gender	Neutral	<p>The recommended options of the various policy amendments and new policies will not adversely affect this group due to its characteristics.</p> <p>The service will monitor the equalities characteristics of people who were affected by this proposal, where possible.</p>
Gender Reassignment	Neutral	<p>The recommended options of the various policy amendments and new policies will not adversely affect this group due to its characteristics.</p> <p>The service will monitor the equalities characteristics of people who were affected by this proposal, where possible.</p>
Sexual Orientation	Neutral	<p>The recommended options of the various policy amendments and new policies will not adversely affect this group due to its characteristics.</p> <p>The service will monitor the equalities characteristics of people who were affected by this proposal, where possible.</p>
Religion or Belief	Neutral	<p><u>Application of Policy Framework to Existing Advisory Arrangements</u>  The introduction of a formal policy will allow us to promote equality to all in the Borough and promote cohesion between different groups. The purpose of parking restrictions is to comply with the following priorities and duties:</p> <p>The Council priorities as set out in the Second Local Implementation Plan</p> <ul style="list-style-type: none"> <li>• promote sustainable transport choices</li> <li>• reduce the impact of transport on the environment and wellbeing, in particular air quality and pollution issues affecting the health of residents of and visitors to the borough; and</li> <li>• encourage smarter travel behaviour.</li> </ul> <p>The Council duties regarding parking and traffic enforcement are to ensure</p> <ul style="list-style-type: none"> <li>• road safety and access of vehicles; particularly in case of emergency where fire brigade vehicles</li> </ul>

		<p>and / or ambulances may need urgent access</p> <ul style="list-style-type: none"> <li>• access to parking space for the disabled, residents and businesses; and</li> <li>• adherence to national and London-wide policies on the environment and transportation.</li> </ul> <p>In recent years, the National Secular Society has challenged numerous local authorities across the UK on equalities grounds as a result of those Councils only offering permitting parking arrangements to be made with religious organisations. Although all historic advisory arrangements made by Parking, Mobility &amp; Transport Services have been at the request of religious organisations, this does not mean that officers would only consider such arrangements from religious establishments.</p>
Age	Neutral	<p>The recommended options of the various policy amendments and new policies will not adversely affect this group due to its characteristics.</p> <p>The service will monitor the equalities characteristics of people who were affected by this proposal, where possible.</p> <p><u>All-day visitor parking</u> Residents over 60 years old and those who require carers will continue being entitled to receive scratchcard free of charge.</p>
Marriage and Civil Partnerships.	Neutral	<p>The recommended options of the various policy amendments and new policies will not adversely affect this group due to its characteristics.</p> <p>The service will monitor the equalities characteristics of people who were affected by this proposal, where possible.</p>
Pregnancy and Maternity	Neutral	<p>The recommended options of the various policy amendments and new policies will not adversely affect this group due to its characteristics.</p> <p>The service will monitor the equalities characteristics of people who were affected by this proposal, where possible.</p>
Other Socio-economic Carers	None	

## Section 4 – Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence or view that suggests that different equality or other protected groups (inc' staff) could be adversely and/or disproportionately impacted by the proposal?

**No**

If yes, please detail below how evidence influenced and formed the proposal? For example, why parts of the proposal were added / removed?

*(Please note – a key part of the EA process is to show that we have made reasonable and informed attempts to mitigate any negative impacts. An EA is a service improvement tool and as such you may wish to consider a number of alternative options or mitigation in terms of the proposal.)*

*Where you believe the proposal discriminates but not unlawfully, you must set out below your objective justification for continuing with the proposal, without mitigating action.*

## Section 5 – Quality Assurance and Monitoring

Have monitoring systems been put in place to check the implementation of the proposal and recommendations?

**No**

How will the monitoring systems further assess the impact on the equality target groups?

Does the policy/function comply with equalities legislation?

(Please consider the [OTH objectives](#) and [Public Sector Equality Duty](#) criteria)

**Yes**

If there are gaps in information or areas for further improvement, please list them below:

None known at this time

How will the results of this Equality Analysis feed into the performance planning process?




## Section 6 - Action Plan

*As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below.*

<b>Recommendation</b>	<b>Key activity</b>	<b>Progress milestones including target dates for either completion or progress</b>	<b>Officer responsible</b>	<b>Progress</b>
Develop a monitoring system	Establish a process Create and use feedback forms.	Process drafted and signed off by Nov 2016 Forms ready for January 2017	RT & CS	

## Appendix A

### (Sample) Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.	<b>Suspend – Further Work Required</b>	Red 
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy.	<b>Further (specialist) advice should be taken</b>	Red Amber 
As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.	<b>Proceed pending agreement of mitigating action</b>	Amber 
As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.	<b>Proceed with implementation</b>	Green: 