

# Equality Impact Analysis (EIA) – impact on residents, service users and wider community

## Section 1: Introduction

Name of proposal
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
LBTH Markets Improvement Plan 2022 - 2027
Service area and Directorate responsible
Regeneration/Market Services, Place Directorate
Name of completing officer
Adam Richards, Regeneration Project Manager
Approved by (Corporate Director / Divisional Director/ Head of Service)
Sripriya Sudhakar
Date of approval
09/03/2022

Where a proposal is being taken to a committee, please append the completed EIA(s) to the cover report.

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

Conclusion	Current decision rating (see Appendix A)

4 Our street markets are frequented by a diverse range of people from across the borough and beyond, therefore the proposals outlined within the Plan will positively impact residents living and working in Tower Hamlets, particularly people living near our street markets.

We have not identified any data in the context of the Plan that shows people with particular protected characteristics are negatively impacted. The Plan will ensure the council's markets reflect the diversity of the borough through their traders, the products sold, and their appeal to wide sections of the community, therefore all residents and visitors to the borough will benefit from the 10 themes identified in the Plan.

**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: General information about the proposal

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010

The LBTH Markets' Improvement Plan 2022 – 2027 sets out the Council's approach to improving the performance and competitiveness of our 10 street markets. The Improvement Plan excludes privately operated markets in the borough, for example Victoria Park Market and Spitalfields Market.

The Plan sets the scene for London's markets, street trading and high streets and how they impact the borough's markets. It proposes a vision for our markets and priorities for the next five years to ensure they can adapt, where needed, and remain strong into the future.

The Plan has been developed with the support of The Assembly Line, a specialist markets consultancy. The Plan was based upon desk-based research and analysis, internal and external interviews, and a survey of shoppers, businesses and market traders.

To inform the Plan two borough-wide surveys were carried out during 2021, an engagement survey, and a consultation survey.

The first engagement survey asked each group (businesses, residents and market traders) a series of questions about participants shopping/trading habits and gave the chance to feedback on specific markets in their local area. Participants were able to answer questions on more than one market if they had several that they use regularly, and this swelled the feedback from 680 individual responses, to a total of 1020 responses on individual markets: 715 from residents, 168 from traders and 137 from businesses

The second consultation survey asked each group (businesses, residents and market traders) whether they agree with the draft vision for the Council's 10 street markets, and the draft themes included in the London Borough of Tower Hamlets Markets Improvement Plan 2022 – 2027. Participants were also able to give their view on any additional themes that were not captured, as well as any specific actions plan covering each of the Council's 10 street markets.

The Borough-wide consultation survey received 75 responses: 60 from residents, 6 from traders and 7 from businesses. Further details on the surveys and response rate are included within the Plan and Appendix IV Equalities Impact Analysis. No material changes were made to the London Borough of Tower Hamlets Markets Improvement Plan 2022 – 2027 following the consultation on the draft version because the majority of feedback and comments agreed with the 10 themes set out to achieve the vision of the Plan, described below.

The Plan proposes a vision for our market and key priorities for the five years ahead, from 2022 – 2027:

*The Council's markets should reflect the diversity of the borough through their traders, the products sold and their appeal to wide sections of the community. The markets should offer a range of products or speciality goods that are of high quality and at a range of price points. They should contribute positively to their town centre or high street and build strong relationships with businesses and other stakeholders around them.*

The Plan considers the context in which the council's street markets operate, in relation to high streets and town centres, the Covid-19 pandemic, London-wide initiatives and complementary strategies and policies within the council.

The Plan goes on to identify 10 themes on which participants commented most frequently and will have the biggest impact on the future of the markets. It also references known funding opportunities and performance metrics for how change can be monitored.

- **Business support and enterprise:** How the council can better support existing traders, start-up businesses and residents in the borough
- **Commodities:** What is sold at the markets and how these goods relate to what shoppers want to buy
- **Enforcement and regulation:** The markets office and trader reps need to work together to raise standards, the market environment and (as a last resort) to enforce
- **Marketing:** How shoppers and other audiences can find out about the markets, the traders and buy goods
- **Operations (trader facilities):** Traders need improved facilities to be more successful which in turn could increase optimism and improve the market environment
- **Partnerships:** In some locations relationships between businesses and the market are far from harmonious. A more joint approach is needed to improve the town centre or high streets for all users rather than the market being viewed as a negative contributor.
- **Place:** The markets exist in the context of the high street or town centre in which they are located. There is limited acknowledgment of this in relation to the market layout (pitch plan), interaction with shops and access to other users.
- **Programming:** Special events and occasions featured highly in feedback and some markets need to be treated as more of an event to encourage visitors.
- **Sustainability:** The council was one of the first in the country to declare a climate emergency and is at the forefront of addressing climate change yet many comments about the markets refer to the waste, a lack of bike racks and a desire for less plastic and more eco goods at the markets.
- **Trading Hours and Days:** Hours are broadly unchanged from how they have always been however the Covid-19 pandemic has resulted in changes to how people work and shop meaning now is a good time to review them to see if any change is needed.

In tandem with the Plan, individual action plans were developed for each of our 10

street markets and a more focussed action plan covering Whitechapel Market to support the Whitechapel Road Improvement Programme. In creating individual market action plans, each market has a focused plan for improvements, subject to funding and resource, to work towards better serving their customers whilst providing traders with upgraded facilities.

## Section 3: Evidence (consideration of data and information)

What evidence do we have which may help us think about the impacts or likely impacts on residents, service users and wider community?

There are three key sources of evidence that help us think about the impacts of the Markets Improvement Plan on likely residents, service users and wider community.

1. The Borough Profile 2020 brings together the key facts and figures about Tower Hamlets into one consolidated report using ONS and 2011 census data.
2. Non-mandatory questions were asked of the survey responders which has provided an equality profile of the people who completed the survey. Of the ~700 total survey responses the number of responses for each question ranges between ~100 at the lower end of the range, and ~600 at the upper end of the range. The survey was carried out during spring/summer 2021. 158 response were received from market traders, 138 from businesses and 384 residents/visitors (shoppers) completed the survey.
3. The Mosaic Public Sector Profile of Tower Hamlets 2016 provides a snapshot of the economic trends of the general Tower Hamlet population, using the Mosaic classification.

Tower Hamlets has 10 street markets located on key high streets and within designated town centres. These markets are situated within the heart of the community and are used not only by Tower Hamlets residents, but also by people who regularly work in these areas and by people who visit the borough.

Our street markets are frequented by a diverse range of people from across the borough and beyond and therefore the proposals outlined within the Plan will have an impact on the whole borough community. There are some markets that currently serve a narrow(er) demographic of the brough, but the 'the equality profile' of the users of our street markets most likely reflects the general profile of

the borough's community given that the majority of survey responders use more than one market.

The Borough Profile and equality profile of the survey responders therefore acts as a useful comparison tool in reviewing the make-up of the general borough community, and thus provides a profile of the likely impact on residents, service users and wider community who use our street markets.

While we do not know the equality make-up of the users of the markets, from a resident point of view, we can determine that the users will reflect the makeup of the borough, therefore all residents and visitors to the borough will benefit from

- Improved facilities
- A more diverse shopping range of commodities
- Flexibility in the opening times of markets

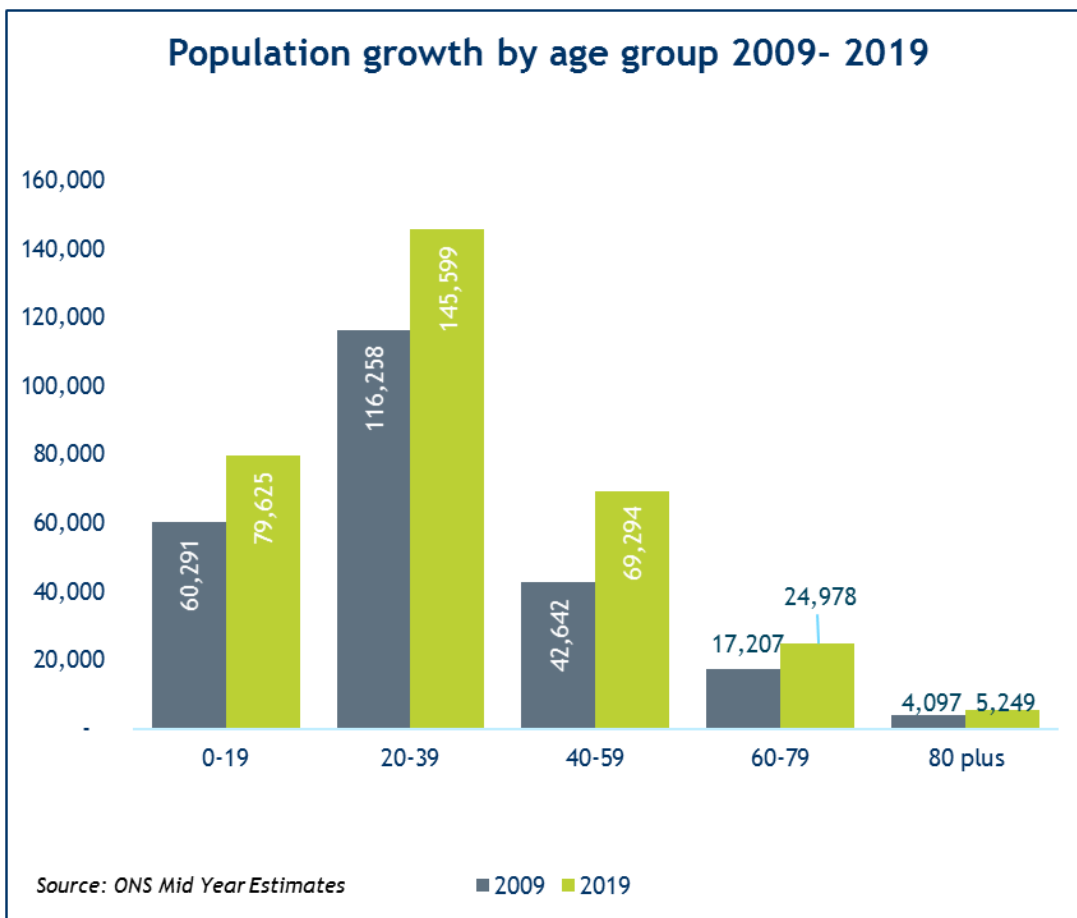
Below is a summary of the analysis of this data, for the purposes of comparison information from the Borough Profile is presented next to the equality criteria collected from survey responders.

### **Age**

The latest population estimates published by ONS show that Tower Hamlets continues to have one of the youngest populations in the country with a median age of 31.6. Along with Leicester, the borough has the equal fifth youngest median age after Oxford (28.9), Nottingham (29.7), Manchester (30.1) and Cambridge (30.3).

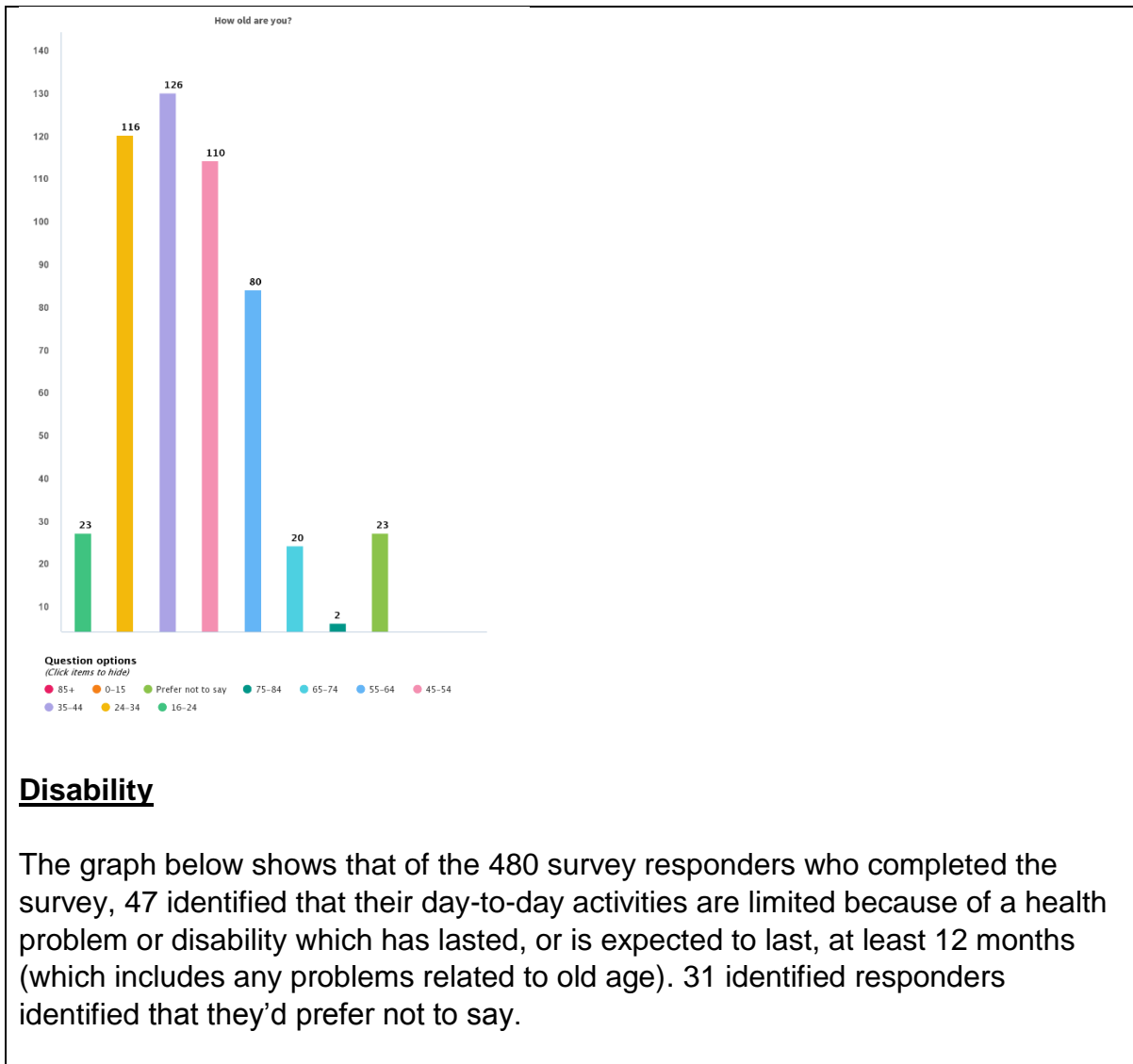
Tower Hamlets has a similar proportion of young people aged 0-19 to England and London. One in four (25%) of the borough's residents are in this age group. The largest age group is the 20–39-year-olds. Approximately 46% of the population are aged 20-39. This is higher than London (33%) and England (26%).

England has an older population when compared to Tower Hamlets and London. Only 6% of the borough's population are aged 65+ compared to 12% in London and 18% in England.



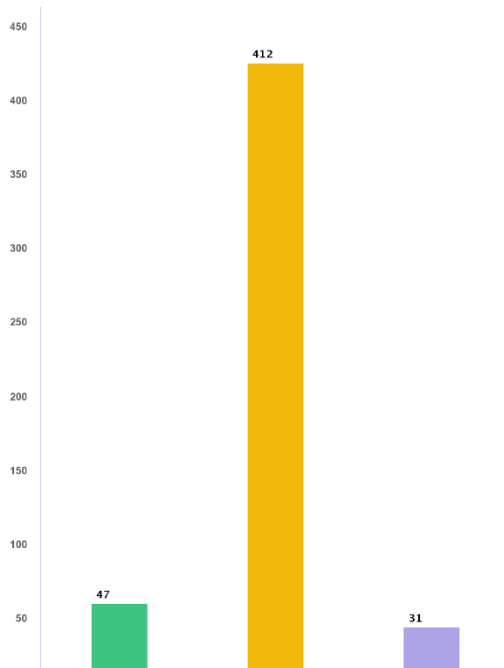
The graph below shows the age distribution of survey responders. The average of responders is higher than the borough average and no responders aged 24 or under who completed the survey provided equalities information.

We have not identified any data in the context of this strategy that show people who have different age are disproportionately represented. A plan which helps the council’s markets reflect the diversity of the borough through their traders, the products sold and their appeal to wide sections of the community will benefit all, including this group.





Are your day to day activities limited because of a health problem or disability which has lasted, ...



Question options  
(Click items to hide)

Prefer not to say
  No
  Yes

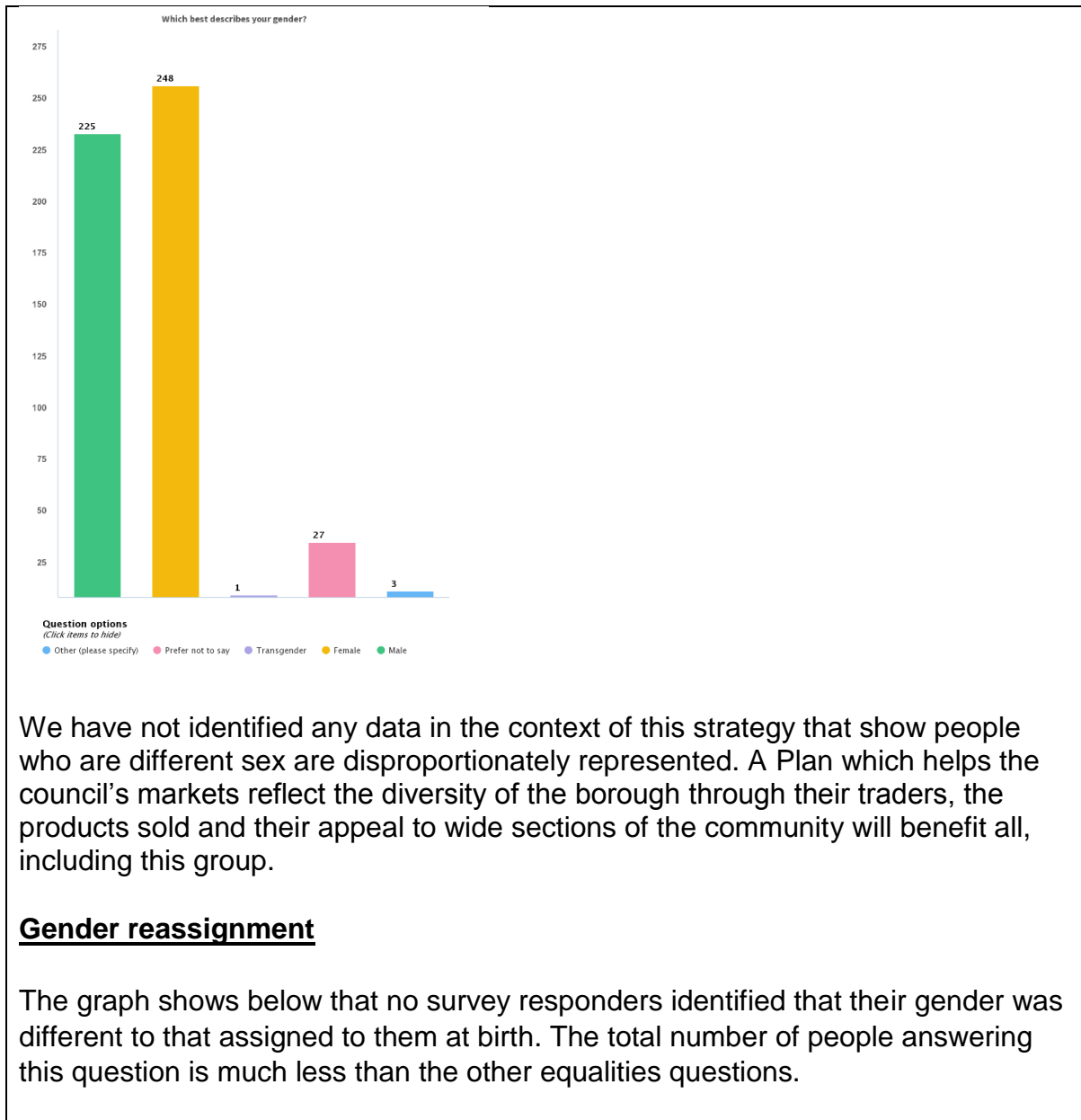
We have not identified any data in the context of this strategy that show people who have a disability are disproportionately represented. A Plan which helps the council's markets reflect the diversity of the borough through their traders, the products sold and their appeal to wide sections of the community will benefit all, including this group.

## Sex

We have around 14,000 more male residents than female residents. This is the 4<sup>th</sup> highest ratio of males to females in the country, this is higher than the ratio in both London and UK where there are more females than males.

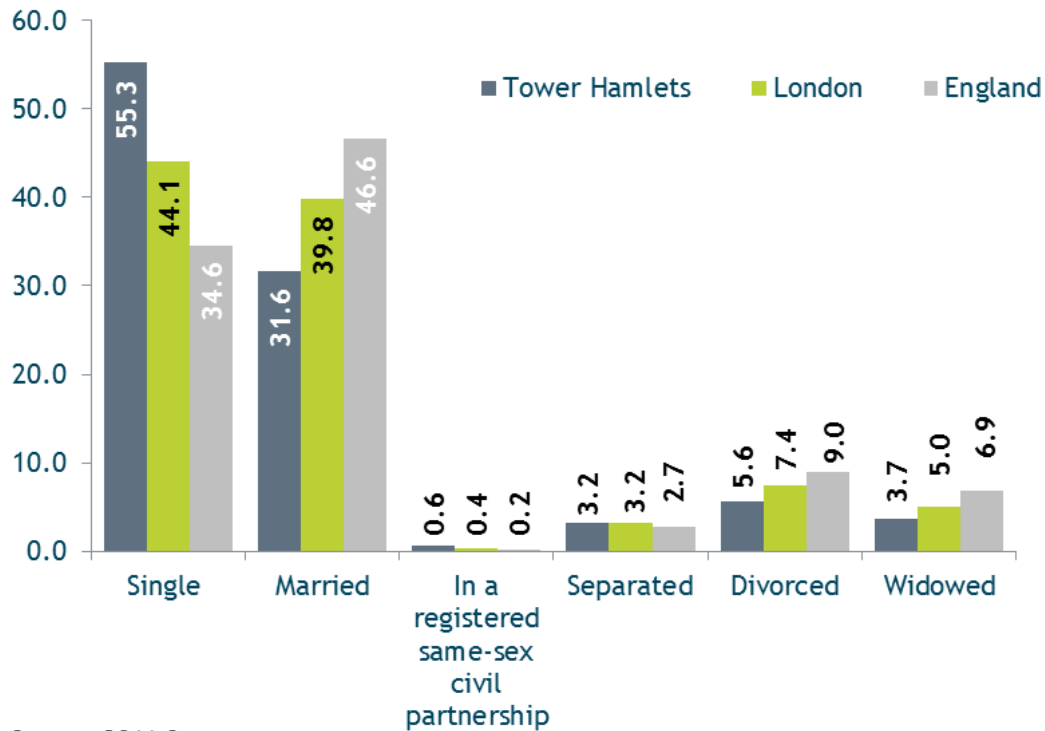
The borough has 52.1% male residents and 47.9% female residents (ONS Mid Year Estimates 2019).

The gender of market traders (up to a possible 158 possible responders) is overwhelmingly male, but the graph below shows the survey responders overall were majority female, by 23, which contradicts the borough average and reverses the impact of market traders response, or lack thereof, completing the survey.





### % of Marital status of all residents aged 16+



Source: 2011 Census

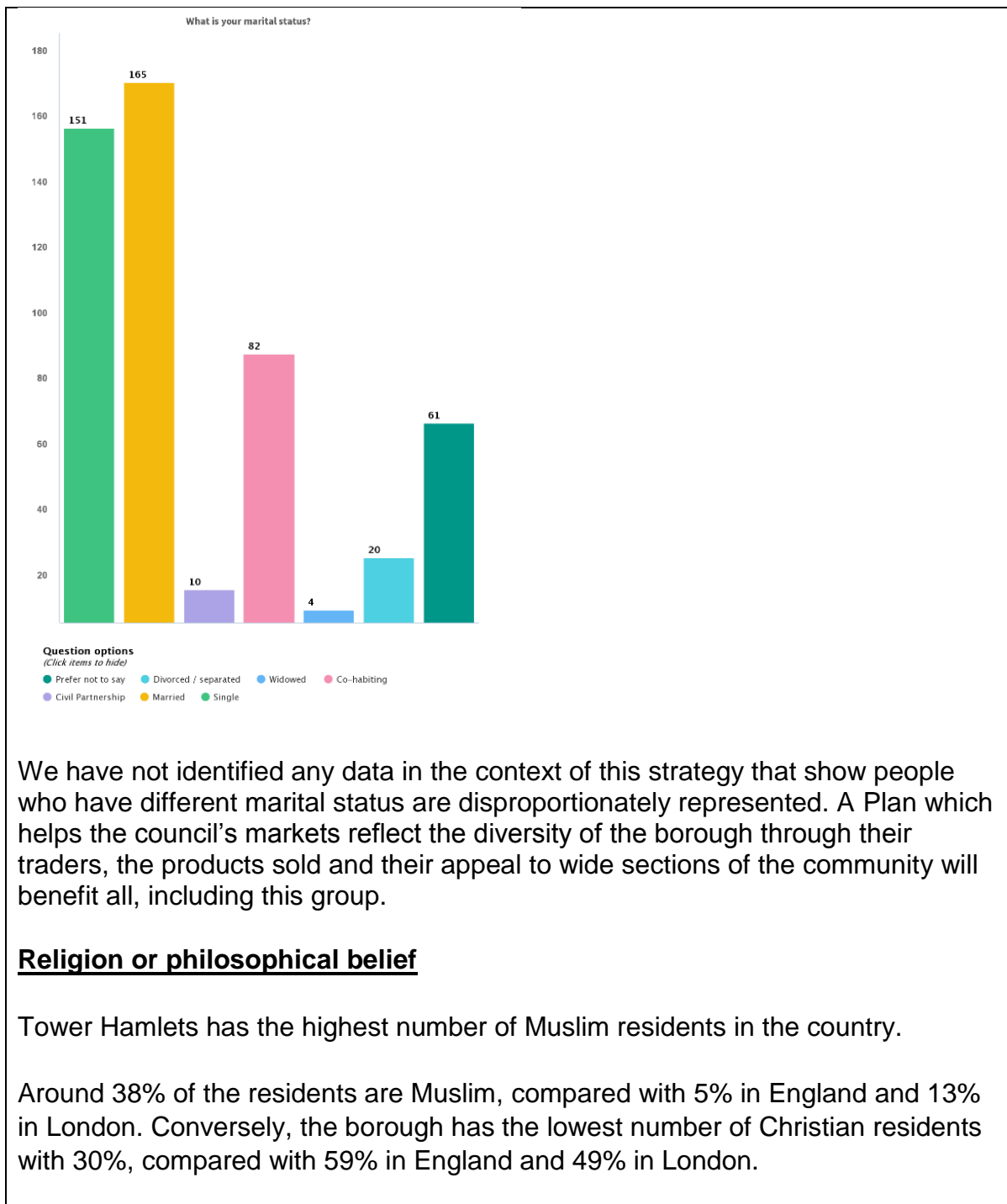
\*Single includes those never married or never registered a same-sex civil partnership

\*Separated includes those still legally married or still legally in a same-sex civil partnership

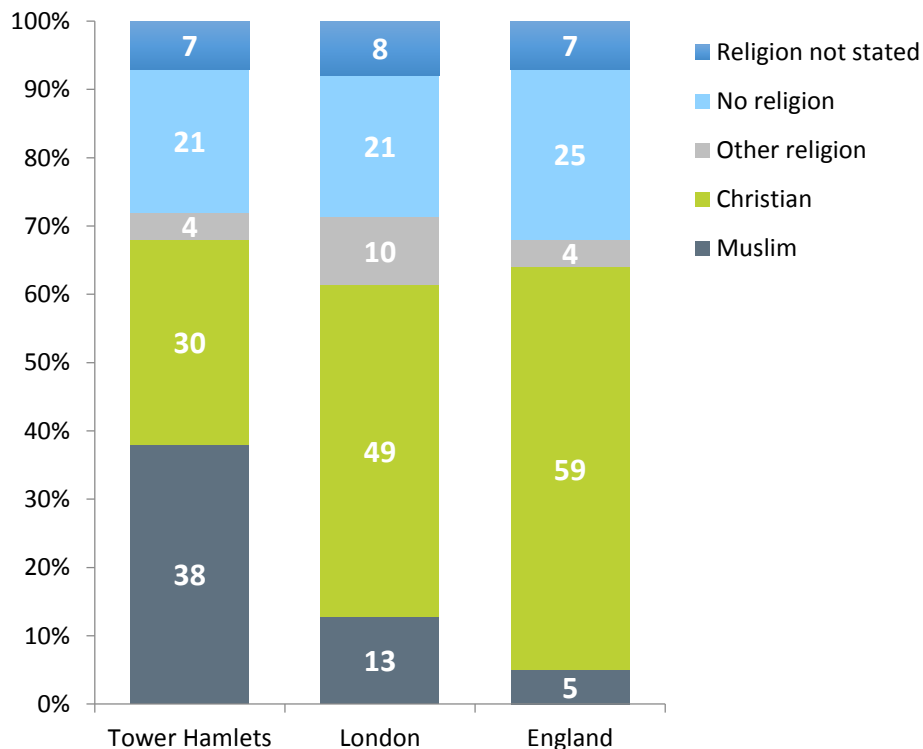
\*Divorced or those formally in a same-sex civil partnership which is now legally dissolved

\*Widowed or surviving partner from a same-sex civil partnership

The graph below shows that the proportion of survey responders who are married rather than single is higher than the borough average.



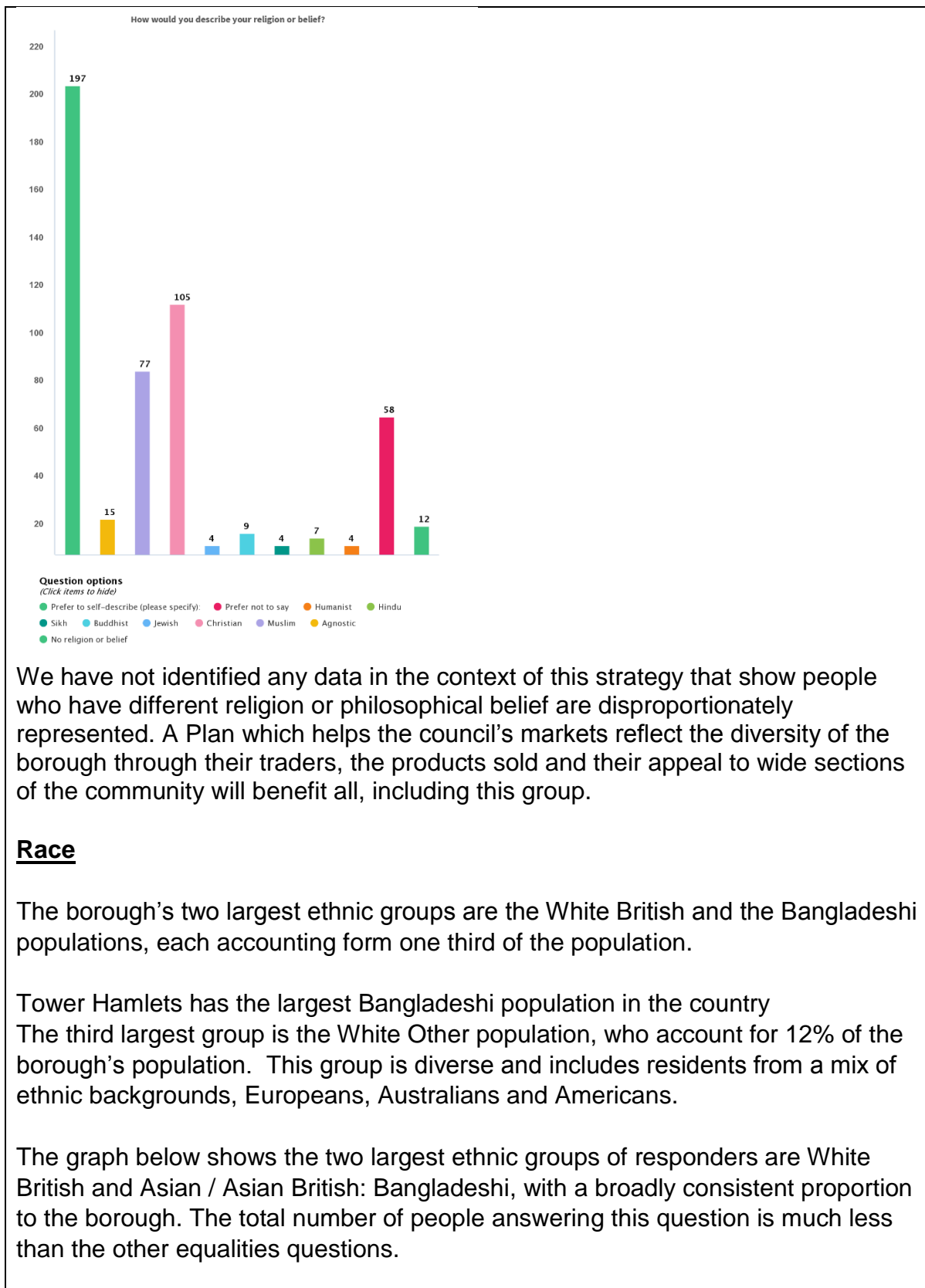
### Faith profile of Tower Hamlets compared with London and England 2011

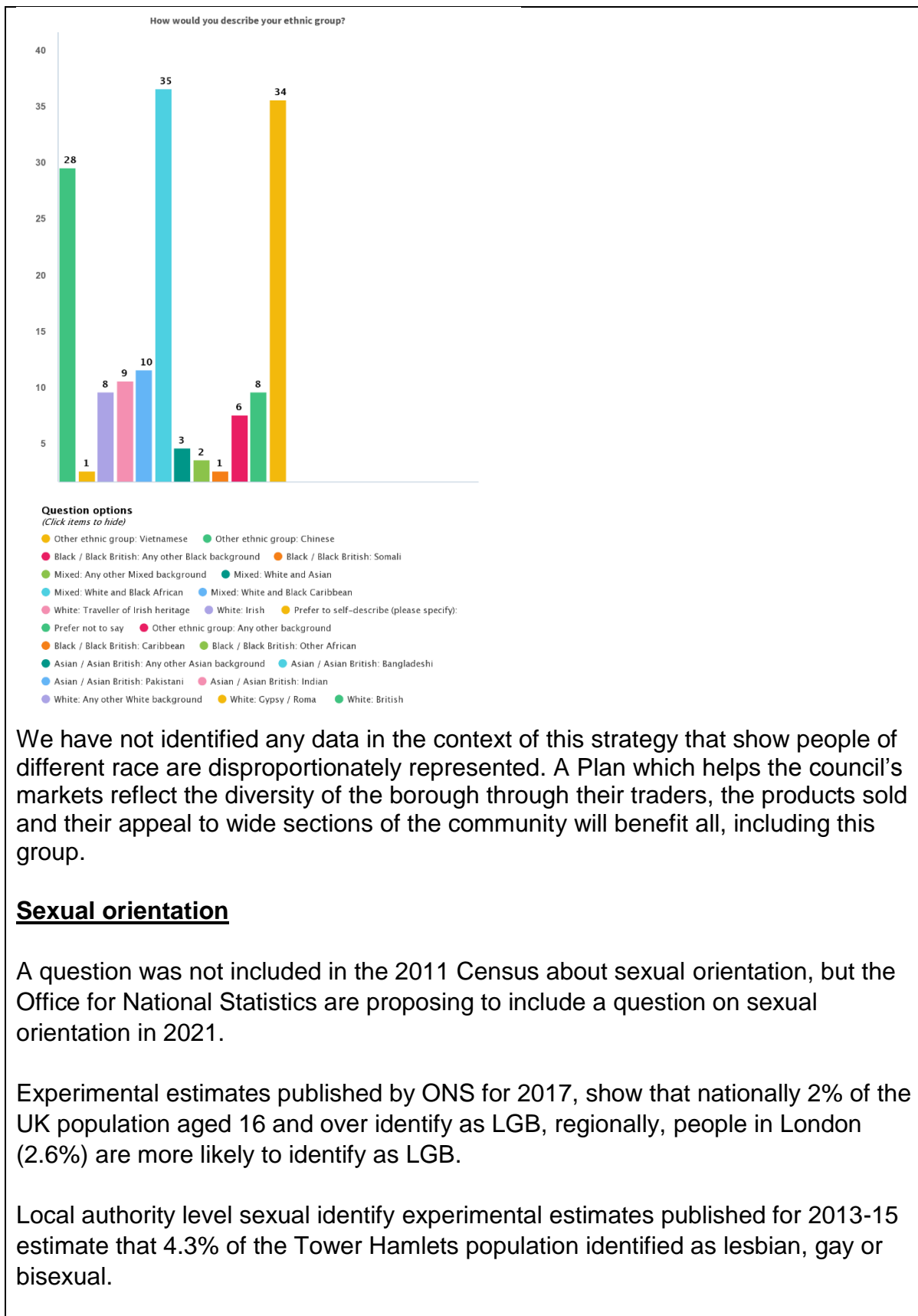


ONS 2011 Census, Table KS209EW & GLA corrected tables for Tower Hamlets and London via London Datastore.

Please note: Original published Census data on religion had errors for 3 local authorities: Tower Hamlets, Camden and Islington which was corrected in 2015

The graph below shows the number of responders who identified as Christian rather than Muslim is higher than the borough average. The number of people who identified as preferring to self-describe is significant, but the proportion of each religion is broadly consistent with the borough average and survey results.





We have not identified any data in the context of this strategy that show people of different race are disproportionately represented. A Plan which helps the council's markets reflect the diversity of the borough through their traders, the products sold and their appeal to wide sections of the community will benefit all, including this group.

### Sexual orientation

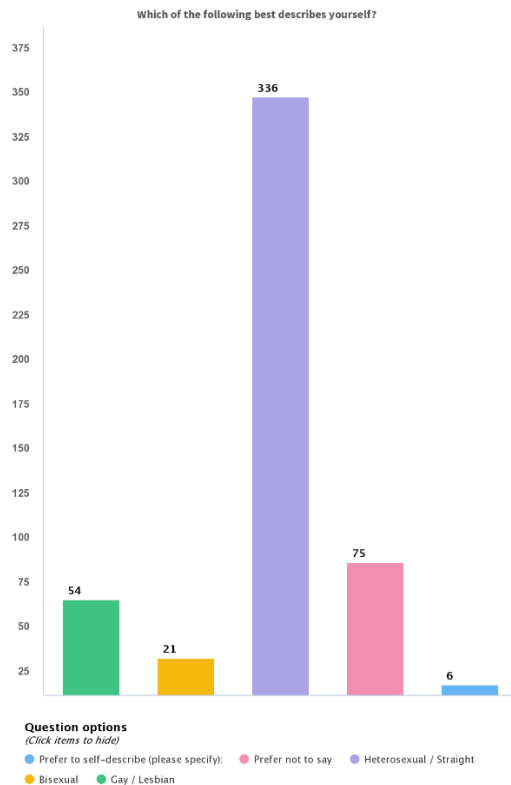
A question was not included in the 2011 Census about sexual orientation, but the Office for National Statistics are proposing to include a question on sexual orientation in 2021.

Experimental estimates published by ONS for 2017, show that nationally 2% of the UK population aged 16 and over identify as LGB, regionally, people in London (2.6%) are more likely to identify as LGB.

Local authority level sexual identify experimental estimates published for 2013-15 estimate that 4.3% of the Tower Hamlets population identified as lesbian, gay or bisexual.



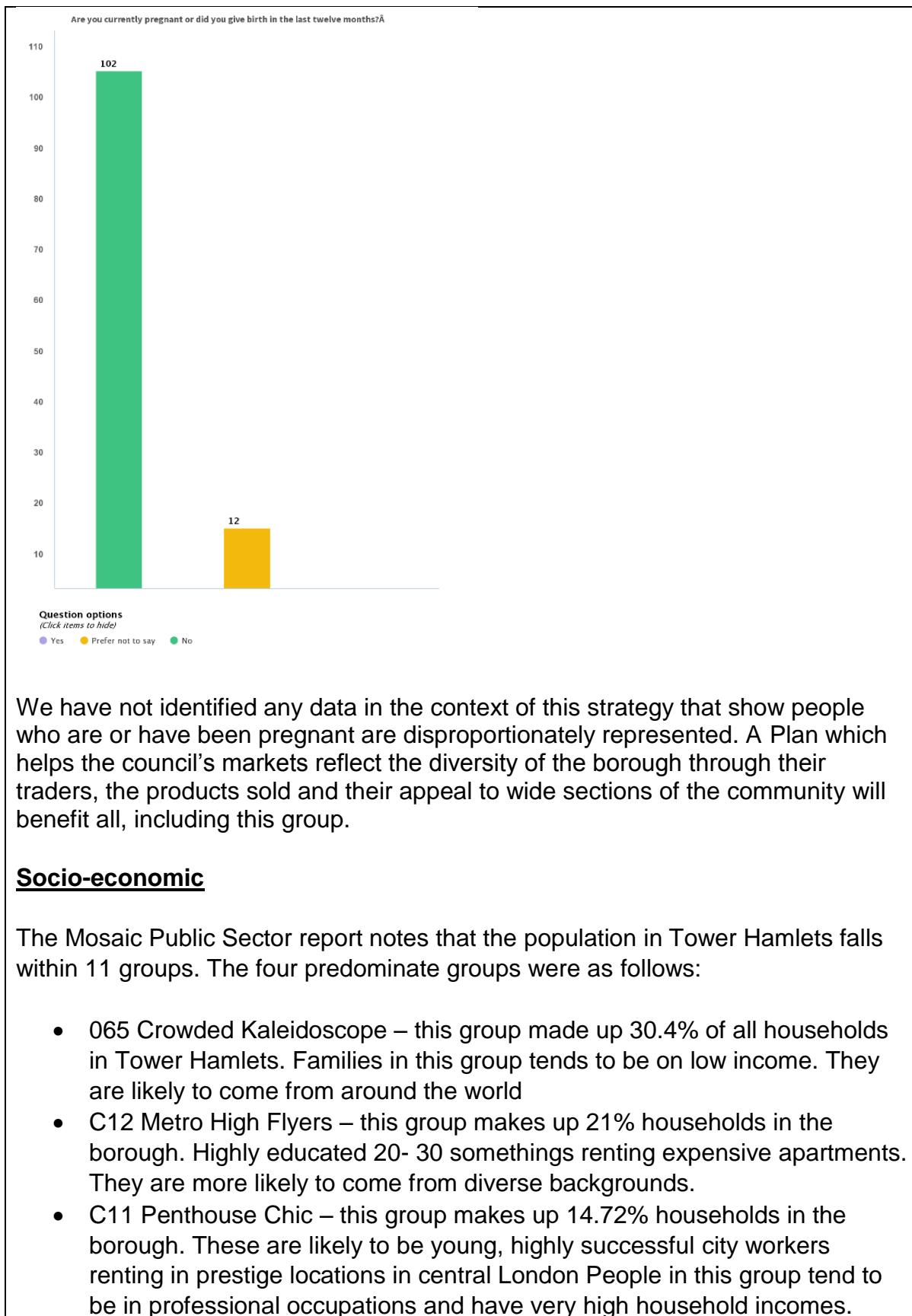
The graph below shows that a higher proportion of survey responders identify as Gay / Lesbian and Bisexual than the experimental estimates published previously.



We have not identified any data in the context of this strategy that show people who with different sexual orientation are disproportionately represented. A Plan which helps the council's markets reflect the diversity of the borough through their traders, the products sold and their appeal to wide sections of the community will benefit all, including this group.

### **Pregnancy and maternity**

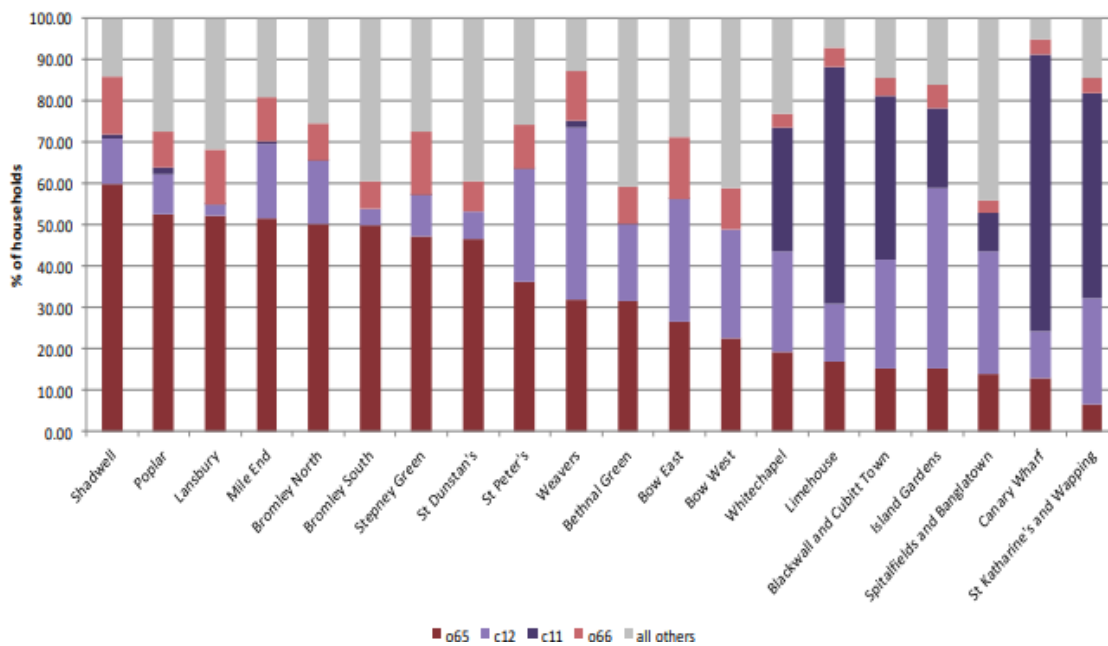
The graph below shows no survey responders responded as being currently pregnant or giving birth in the last twelve months. The total number of people answering this question is much less than the other equalities questions.



- 066 Inner City Stalwarts – this group makes up 8.23% households in the borough. Typically aged over 55 and long-term renters. They are more likely to live in social housing.

The table below, show the distribution of these groupings by ward within the borough.

**Distribution of Top 4 Mosaic Public Sector Types by Ward, 2016**



We have not identified any data in the context of this strategy that show people of different socio-economic background are disproportionately represented. A Plan which helps the council's markets reflect the diversity of the borough through their traders, the products sold and their appeal to wide sections of the community will benefit all, including this group.

## Section 4: Assessing the impacts on different groups and service delivery

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
<b>Protected</b>				
<b>Age</b> (All age groups)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The LBTH Markets Improvement Plan 2022 – 2027 sets out the Council’s approach to improving the performance and competitiveness of our 10 street markets. Currently the service does not collect specific equality data for this group. However, as the Council’s 10 street markets serve all sections of the community, the proposals are likely to have a positive impact on this group. For example, a Phase 1 action in the Whitechapel Market Action proposes attracting new traders that represent the local community targeting local residents, young people and start-ups. Equalities data will be collected as a part of the monitoring process of the Plan.
<b>Disability</b> (Physical, learning difficulties, mental)				The LBTH Markets Improvement Plan 2022 – 2027 sets out the Council’s approach to improving the performance and

<p>health and medical conditions)</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>competitiveness of our 10 street markets. Currently the service does not collect specific equality data for this group. However, as the Council's 10 street markets serve all sections of the community, the proposals are likely to have a positive impact on this group. For example, a Phase 2 action in the Watney Market Action Plan proposes to undertake public realm and highways improvement to the square to improve access and movement around the market, subject to funding being identified. Equalities data will be collected as a part of the monitoring process of the Plan.</p>
<p><b>Sex</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The LBTH Markets Improvement Plan 2022 – 2027 sets out the Council's approach to improving the performance and competitiveness of our 10 street markets. Currently the service does not collect specific equality data for this group. However, as the Council's 10 street markets serve all sections of the community, the proposals are likely to have a positive impact on this group. For example, a Phase 1 actions in the Whitechapel Market Action Plan proposes identifying access to toilets for traders and attracting new traders that represent the local community targeting local residents, young people and start-ups. Equalities data will be collected as a part of the monitoring process of the Plan.</p>

<p><b>Gender reassignment</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The LBTH Markets Improvement Plan 2022 – 2027 sets out the Council’s approach to improving the performance and competitiveness of our 10 street markets. Currently the service does not collect specific equality data for this group. However, as the Council’s 10 street markets serve all sections of the community, the proposals are likely to have a positive impact on this group. Equalities data will be collected as a part of the monitoring process of the Plan.</p>
<p><b>Marriage and civil partnership</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The LBTH Markets Improvement Plan 2022 – 2027 sets out the Council’s approach to improving the performance and competitiveness of our 10 street markets. Currently the service does not collect specific equality data for this group. However, as the Council’s 10 street markets serve all sections of the community, the proposals are likely to have a positive impact on this group. Equalities data will be collected as a part of the monitoring process of the Plan.</p>
<p><b>Religion or philosophical belief</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The LBTH Markets Improvement Plan 2022 – 2027 sets out the Council’s approach to improving the performance and competitiveness of our 10 street markets. Currently the service does not collect specific equality data for this group. However, as the Council’s 10 street markets</p>

				serve all sections of the community, the proposals are likely to have a positive impact on this group. Equalities data will be collected as a part of the monitoring process of the Plan.
<b>Race</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The LBTH Markets Improvement Plan 2022 – 2027 sets out the Council’s approach to improving the performance and competitiveness of our 10 street markets. Currently the service does not collect specific equality data for this group. However, as the Council’s 10 street markets serve all sections of the community, the proposals are likely to have a positive impact on this group. Equalities data will be collected as a part of the monitoring process of the Plan.
<b>Sexual orientation</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The LBTH Markets Improvement Plan 2022 – 2027 sets out the Council’s approach to improving the performance and competitiveness of our 10 street markets. Currently the service does not collect specific equality data for this group. However, as the Council’s 10 street markets serve all sections of the community, the proposals are likely to have a positive impact on this group. Equalities data will be collected as a part of the monitoring process of the Plan.
				The LBTH Markets Improvement Plan 2022

<b>Pregnancy and maternity</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>– 2027 sets out the Council’s approach to improving the performance and competitiveness of our 10 street markets. Currently the service does not collect specific equality data for this group. However, as the Council’s 10 street markets serve all sections of the community, the proposals are likely to have a positive impact on this group. Equalities data will be collected as a part of the monitoring process of the Plan.</p>
<b>Other</b>				
<b>Socio-economic</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The LBTH Markets Improvement Plan 2022 – 2027 sets out the Council’s approach to improving the performance and competitiveness of our 10 street markets. Currently the service does not collect specific equality data for this group. However, as the Council’s 10 street markets serve all sections of the community, the proposals are likely to have a positive impact on this group. Equalities data will be collected as a part of the monitoring process of the Plan.</p>
<b>Parents/Carers</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The LBTH Markets Improvement Plan 2022 – 2027 sets out the Council’s approach to improving the performance and competitiveness of our 10 street markets. Currently the service does not collect specific equality data for this group.</p>



				<p>However, as the Council's 10 street markets serve all sections of the community, the proposals are likely to have a positive impact on this group. Equalities data will be collected as a part of the monitoring process of the Plan.</p>
<p>People with different <b>Gender Identities</b> e.g. Gender fluid, Non-Binary etc</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The LBTH Markets Improvement Plan 2022 – 2027 sets out the Council's approach to improving the performance and competitiveness of our 10 street markets. Currently the service does not collect specific equality data for this group. However, as the Council's 10 street markets serve all sections of the community, the proposals are likely to have a positive impact on this group. Equalities data will be collected as a part of the monitoring process of the Plan.</p>
<p><b>Any other groups</b></p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The LBTH Markets Improvement Plan 2022 – 2027 sets out the Council's approach to improving the performance and competitiveness of our 10 street markets. Currently the service does not collect specific equality data for this group. However, as the Council's 10 street markets serve all sections of the community, the proposals are likely to have a positive impact on this group. Equalities data will be collected as a part of the monitoring process of the Plan.</p>

## Section 5: Impact analysis and action plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress
Carry out a review of equality criteria relative to the delivery of each street market's action plan	Carry out a review of equality criteria relative to the delivery of each street market's action plan	Two-year review period	Damian Patchell	N/A



## Section 6: Monitoring

What monitoring processes have been put in place to check the delivery of the above action plan and impact on equality groups?

Within the action plans a two-year review timescale has been suggested as the period to collect data. Timing may be adapted and subject to funding coming forward as elements of the 10 action plans are finalised and programmed.

## Appendix A

### EIA decision rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act and appropriate mitigations cannot be put in place to mitigate against negative impact. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p><b>Suspend – Further Work Required</b></p>	<p><b>Red</b></p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p><b>Further (specialist) advice should be taken</b></p>	<p><b>Red Amber</b></p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Impact analysis and action plan</i> section of this document.</p>	<p><b>Proceed pending agreement of mitigating action</b></p>	<p><b>Amber</b></p> 