

EQUALITY IMPACT ASSESSMENT TEMPLATE

Completing an EQIA is the simplest way to demonstrate that the Council has considered the equality impacts of its decisions and it reduces the risk of legal challenge. EQIAs should be carried out at the earliest stages of policy development or a service review, and then updated as the policy or review develops. EQIAs must be undertaken when it is possible for the findings to inform the final decision.

SECTION 1:

Title	Parking Fee Structure Review
<p>What are you analysing?</p> <ul style="list-style-type: none"> • What is the policy/project/activity/strategy looking to achieve? • Who is it intended to benefit? Are any specific groups targeted by this decision? • What results are intended? 	<p>On-street parking charges are already subject to a diesel surcharge applicable to pre-2015 diesel vehicles and resident permit pricing is differentiated according to engine capacity.</p> <p>This review considers the introduction of alternative tiered charging structures based on vehicles' CO₂ emissions for these schemes, identifiable upon payment/application via a DVLA look-up.</p> <p>The objective is to improve air quality and reduce vehicle emissions by encouraging use and ownership of less polluting vehicles and thus discouraging more polluting vehicles. Capital bids have been submitted to cover mobilisation and implementation costs for the new schemes.</p> <p>Moving to emission based charging will require changes to existing parking policy and will be subject of a full Traffic Order consultation.</p>
<p>Details of the lead person completing the screening/EQIA</p>	<p>(i) Full Name: Darren Montague</p> <p>(ii) Position: Parking Service Implementation Manager</p> <p>(iii) Unit: Parking Services</p> <p>(iv) Contact Details: 07811 235074</p>
<p>Date sent to equalities@westminster.gov.uk</p>	<p>November 2022</p>
<p>Version number and date of update</p>	<p>V3.0 (previous versions have been entitled 'Emissions-Based Charging'), 17 November 2022</p>
<p><i>You will need to update your EQIA as you move through the decision-making process. Record the version number here and the date you updated the EQIA. Keep all versions so you have evidence that you have considered equality throughout the process. However <u>only</u> the most updated version will be saved in the Equalities SharePoint folder. 1</i></p>	

SECTION 2: Do you need to complete a full Equality Impact Assessment (EQIA)?

Not all proposals will require a full EQIA, the assessment of impacts should be proportionate to the nature of the project/policy in question and its likely impact. To decide on the level of detail of the assessment required consider the potential impact on persons with protected characteristics.

<p>2.1</p>	<p>Please provide an overview of who uses/will use your service or facility and identify who are likely to be impacted by the proposal</p> <ul style="list-style-type: none"> <i>If you do not formally collect data about a particular group then use the results of local surveys or consultations, census data, national trends or anecdotal evidence (indicate where this is the case). Please attempt to complete all boxes.</i> <i>Consider whether there is a need to consult stakeholders and the public, including members of protected groups, in order to gather information on potential impacts of the proposal</i> 	
	<p>How many people use the service currently? What is this as a % of Westminster’s population?</p>	<p>In 2020/21, our pay-to-park service involved c.4.8m transactions. The number of different vehicle registrations who normally use the service on a monthly basis varies from approx. 150,000-200,000.</p> <p>In 2020/21 we issued 34,294 resident permits.</p> <p>According to the phase 1 release of the 2021 Census data, Westminster has a population of 204,300, with 94,800 households. However, these figures are currently being challenged by the City Council.</p> <p>Only a proportion of those using the pay-to-park service will actually reside in Westminster - it is estimated that only 4% of pay-to-park transactions in Westminster are made by resident permit holders.</p> <p>All resident permit holders reside in Westminster.</p>
	<p>Gender</p>	<p>The gender split of service users is not recorded. According to the DVLA, in Apr 2022 the gender split of UK motorists was 52.4% male and 47.6% female. However, either service (pay-to-park and resident permit scheme) applies regardless of gender.</p>
	<p>Race</p>	<p>This data is not collected. Either service applies regardless of race.</p>

	Disability	According to the DfT in July 2018, there are 2.4m disabled Blue Badges on issue nationwide. Westminster currently has c.3,500 disabled badges on issue. Either service applies regardless of disability.
	Sexual orientation	Data not collected. Either service applies regardless of sexual orientation.
	Age	Data not collected but it is expected it would be in line with UK licence holders: in April 2022 <29 y/o is 17.9%, 30-39 is 17.8%, 40-49 is 17.5%, 50-59 is 19.7%, 60-69 is 15.5% and 70+ is 11.6%. Either service applies regardless of age.
	Religion or belief	Data not collected. Either service applies regardless of religion or belief.
2.2 Are there any groups with protected characteristic that are overrepresented in the monitoring information relative to their size of the population? <i>If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service.</i>	No.	
2.3 Are there any groups with protected characteristics that are underrepresented in the monitoring information relative to their size of the population? <i>If so, this could indicate that the service may not be accessible to all groups or there may be some form of direct or indirect discrimination occurring.</i>	No.	

2.4 Does the project, policy or proposal have the potential to disproportionately impact on people with a protected characteristic? If so, is the impact positive or negative?

	None	Positive	Negative	Not sure
Men or women	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People of a particular race or ethnicity (including refugees, asylum seekers, migrants and gypsies and travellers)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disabled ¹ people (consider different types of physical, learning or mental disabilities)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People of particular sexual orientation/s	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People in particular age groups (consider in particular children, under 21s and over 65s)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People who are intending to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Impact due to pregnancy/ maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People of particular faiths and beliefs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People on low incomes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If any of the answers to the questions above is, “negative” or “unclear” you will need to undertake a detailed impact assessment.

2.5 Based on your responses, should a full, detailed EQIA be carried out on the project, policy or proposal

Yes
 No

2.6 Provide brief reasons on how you have come to this decision?

Should emissions-based charging policies be implemented as an outcome of the review, this has the potential to disproportionately impact upon disabled people and people on low incomes.

¹ Disability discrimination is different from other types of discrimination since it includes the duty to make reasonable adjustments.

Motorists' (in)ability to change or replace their vehicle should it become subject to higher charges is a potential negative impact, which may be particularly pertinent to those with vehicles adapted for disabled drivers or passengers, or for those on low incomes whose vehicles may also be older and more polluting.

However, a positive impact has been identified for elderly people and young people (including those indirectly impacted by the policy as they are under the legal driving age), as they are groups identified as being most vulnerable to the effects of poor air quality, which this policy aims to help improve.

A further potential positive impact has also been identified for people on low incomes, as there is a recognised correlation between exposure to poor air quality and income inequalities, that this policy should help improve.

SECTION 3: ASSESSING THE IMPACT

In order to be able to identify ways to mitigate any potential impact it is essential that we know what those potential impacts might be. Using the evidence gathered in section 2, explain what the potential impact of your proposal might be on the groups you have identified. You may wish to further supplement the evidence you have gathered using the table below in order to properly consider the impact.

Protected Group		Positive impact?			Negative impact? If so, please specify the nature and extent of that impact	No specific impact	If the impact is negative, how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented	What, if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts
		Eliminate discrimination	Advance equality	Good relations				
Gender	Men					x	Complementary – air quality / climate emergency is a central pillar of the Council’s Fairer Westminster policies	
	Women					x		
Race	White					x		
	Mixed/Multiple ethnic groups					x		
	Asian/Asian British					x		
	Black/African/Caribbean/Black British					x		
	Gypsies / travellers					x		
	Other ethnic group					x		
Disability	Physical				Disabled motorists with adapted vehicles may be less able to change their vehicle should higher parking / permit charges be incurred		Difficult to mitigate – the whole point the policy is to discourage use of older and more polluting vehicles. Low-cost alternatives to car ownership and use exist and will be encouraged but these may not be practical or appropriate in some cases	
	Sensory							
	Learning Difficulties					x		
	Learning Disabilities					x		
	Mental Health					x		

							<p>Disabled badges are issued to disabled drivers who meet the criteria. For Westminster residents, white disabled badges enable free parking throughout the City in pay-to-park and resident bays.</p> <p>For visitors various parking concessions are still afforded to disabled blue badge holders, meaning parking is comparatively cheaper compared to non-badge holders.</p> <p>Since 2019, blue badges can be issued to those with non-physical disabilities, as well as physical</p>	
Sexual Orientation	Lesbian, gay men, bisexual					x		
Age	Older people (50+)					x		
	Younger people (16 - 25)					x		
Gender Reassignment						x		
Impact due to pregnancy/maternity						x		
Groups with particular faiths and beliefs						x		

<p>People on low incomes</p>			<p>Motorists on low incomes may more commonly drive older, more polluting vehicles and thus be subjected to higher parking charges, and be less able to change their vehicle if this is the case</p>	<p>Difficult to mitigate – the whole point the policy is to discourage use of older and more polluting vehicles. Low-cost alternatives to car ownership and use exist and will be encouraged: public transport, cycling, walking and WCC Car Clubs</p>	
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SECTION 4: ACTION PLAN

4.1 Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data gaps. <i>Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.</i> NB. Add any additional rows, if required.						
Action Required	Equality Groups Targeted	Intended outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG
Formal Traffic Order consultation exercise prior to any implementation	All motorists and residents	Positive feedback and consensus to progress	TBC	Darren Montague, Parking Services, dmontague@westminster.gov.uk	Q1 2023/24	
Considerate policy development	1) All motorists, and 2) resident permit holders	Any negative impact mitigated	TBC	Darren Montague, Parking Services, dmontague@westminster.gov.uk	ongoing	
<i>Enter additional rows if required</i>						

THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER

SIGNATURE:

FULL NAME: Jon Rowing

UNIT: ECM - Parking

EMAIL & TELEPHONE EXT:

DATE (DD/MM/YYYY): November 2022

WHAT NEXT?

It is the responsibility of the service to complete an EQIA to the required standard and the quality and completeness of EQIAs will be monitored by EMT.

All EQIAs for proposed changes to levels of service arising from budget proposals must be completed by (insert date).

All completed EQIAs should be sent to equalities@westminster.gov.uk