

Enfield Equality Impact Assessment (EqIA)

Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

Section 1 – Equality analysis details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	To move to a system of using solely cashless payments and to remove the boroughs pay and display parking machines.
Team/ Department	David Taylor/ David Morris
Executive Director	Joanne Drew
Cabinet Member	Cllr Rick Jewell
Author(s) name(s) and contact details	David B Taylor david.b.taylor@enfield.gov.uk
Committee name and date of decision	

Date the EqIA was reviewed by the Corporate Strategy Service	04.11.22
Name of Head of Service responsible for implementing the EqIA actions (if any)	David B Taylor
Name of Director who has approved the EqIA	Doug Wilkinson

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

Section 2 – Summary of proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

Please summarise briefly:

What is the proposed decision or change?

What are the reasons for the decision or change?
What outcomes are you hoping to achieve from this change?
Who will be impacted by the project or change - staff, service users, or the wider community?

Summary of Proposal

To maintain the link with engine size and to increase the cost of CPZ permits to ensure that the cost of administering, enforcing and maintaining CPZs are fully recovered.

To introduce an uplift for 2nd and 3rd permits to encourage mode shift away from car use. The change will directly impact service users, with the wider community potentially benefiting if the change helps promote a change to smaller vehicles and/or a switch to active travel modes.

Not to proceed at this stage with the proposals to introduce:

- a three permit per household cap (the existing three permits per person will be retained);
- alterations to change the structure for visitor vouchers (apart from removing the existing 50 voucher per year cap).

Background Information

Analysis by TfL¹ indicates that the following factors are most closely associated with higher than average car ownership:

- living in outer London;
- lower levels of public transport accessibility;
- higher income;
- children in the household;
- more than one adult in the household;
- in full time employment;
- Western European nationality.

At an individual level, car ownership varies by age and gender.

- Broadly, car ownership increases with age up to around 50-60 years old and then declines beyond that.
- On average, 46 per cent of men and 34 per cent of women have access to a car in London.
- Across all age bands, car ownership is lower amongst women, with this gap increasing beyond age 40.

Car ownership also varies with ethnicity:

- Car ownership is highest amongst London residents of White ethnic origin, with car

¹ <https://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf>

ownership around a third lower amongst Black and Mixed or Other ethnic groups.

- Asian families are more likely than other ethnic minority groups to own a car, although car ownership patterns vary substantially between different groups within the 'Asian' categorisation.

Multi-generational households

- Many minority ethnic groups in the UK have greater proportions of multigenerational households compared with the White ethnic group. Which may mean that they are more likely to have multiple cars at one property.

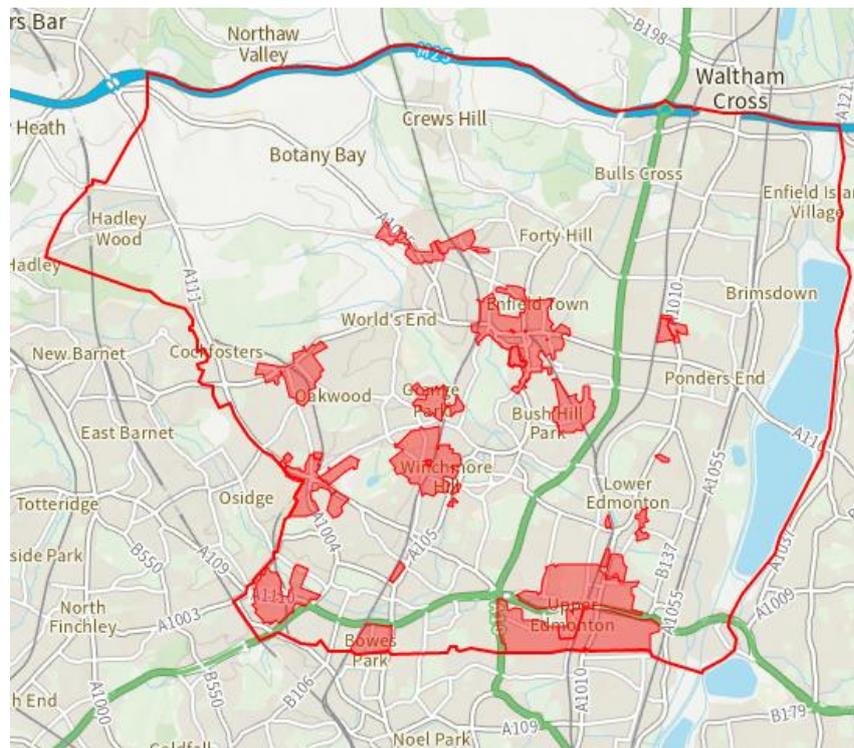
<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/adhocs/12005householdsbyagecompositionandethnicityuk2018>

Local Data

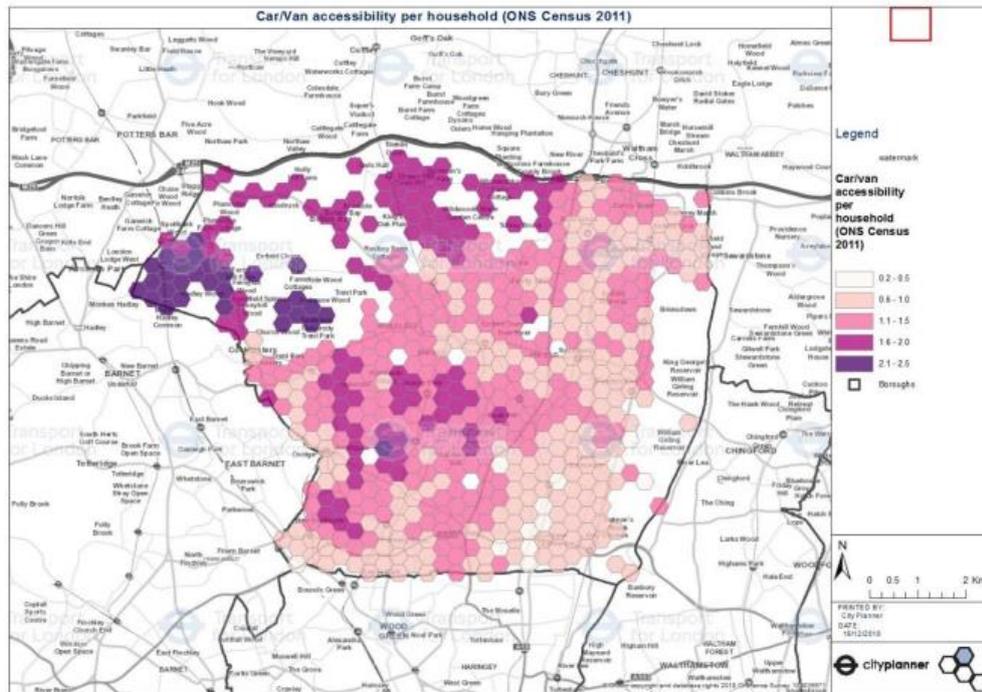
Data regarding the protected characteristics of permit holders is not currently held.

The consultation referred to in the report produced 890 questionnaire responses, 10 emails and one letter. Analysis of the responses indicated that there were differences among disabled and not disabled people in relation to paperless permits (which is not being pursued as part of the current proposals). However, broadly speaking, differences by protected characteristic to other proposals, were either not significant or unlikely to be determining factors. Other factors, such as attitudes to climate change, appeared to be the main influence on residents' perceptions in relation to the proposals.

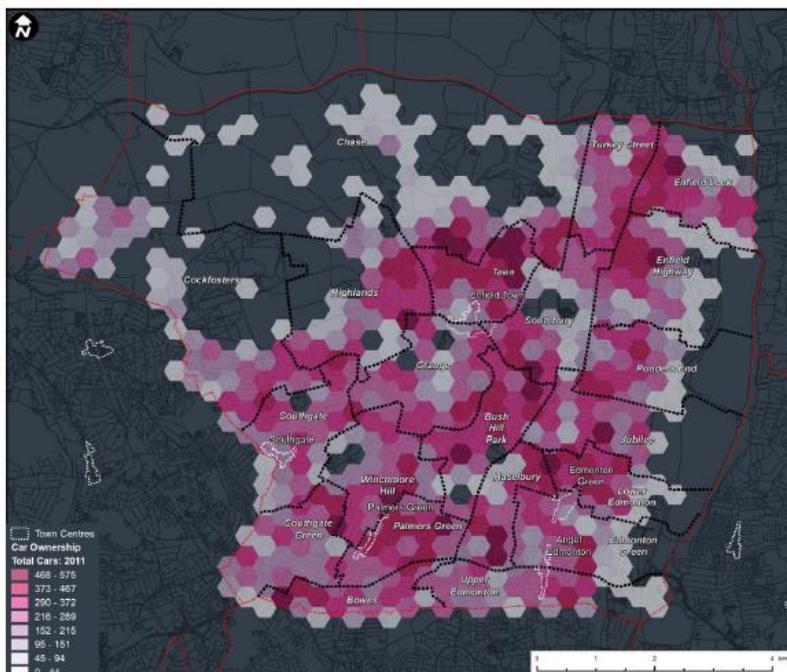
Currently, approximately 15% of the borough falls within a CPZ, as shown on the image below:



The spatial distribution of access to cars/vans across the borough, based on 2011 Census data, is shown below. At this time 19,653 cars were recorded, which equates to 0.38 cars per capita or 0.99 cars per household. The figure shows that access to cars and vans is higher on the western side of the borough.

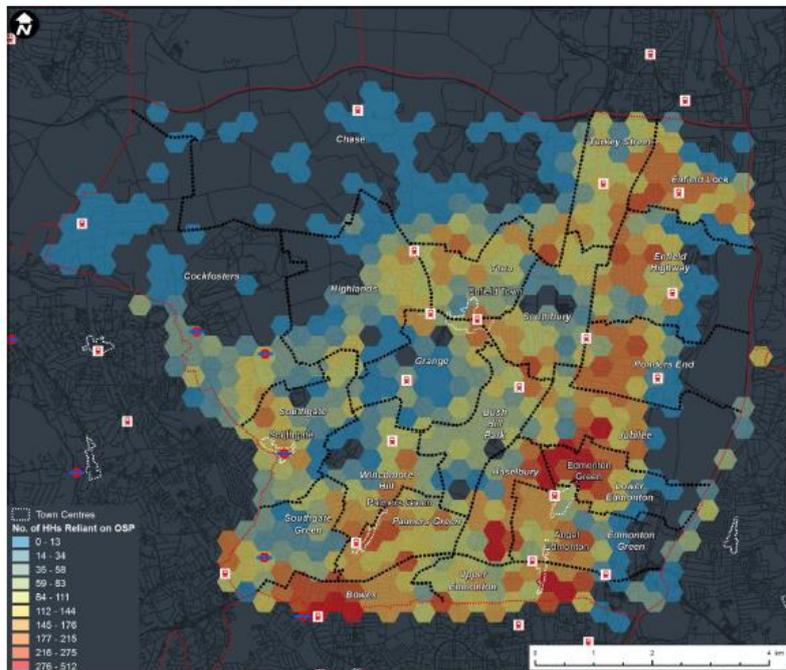


However, because population densities are higher on the eastern side of the borough, the concentration of cars is more evenly spread, as illustrated below:

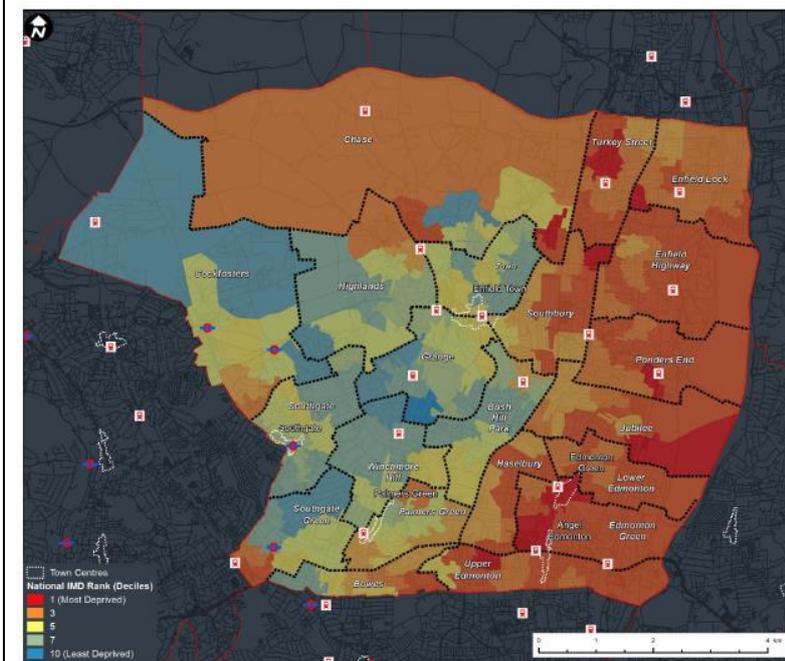


The following figure shows the areas of the borough most dependent on on-street parking,

which are generally to the east and south of the borough.



The following figure sets out indices of multiple deprivation across the borough, based on Census Super Output Areas. This indicates that a number of CPZs coincide with deprived areas, particularly those around Edmonton Green. The South-Edmonton Event Day CPZ also coincides with some deprived part of the borough. However, residents in this CPZ are not affected by the current proposals as their permits are currently free of charge.



Section 3 – Equality analysis

Age

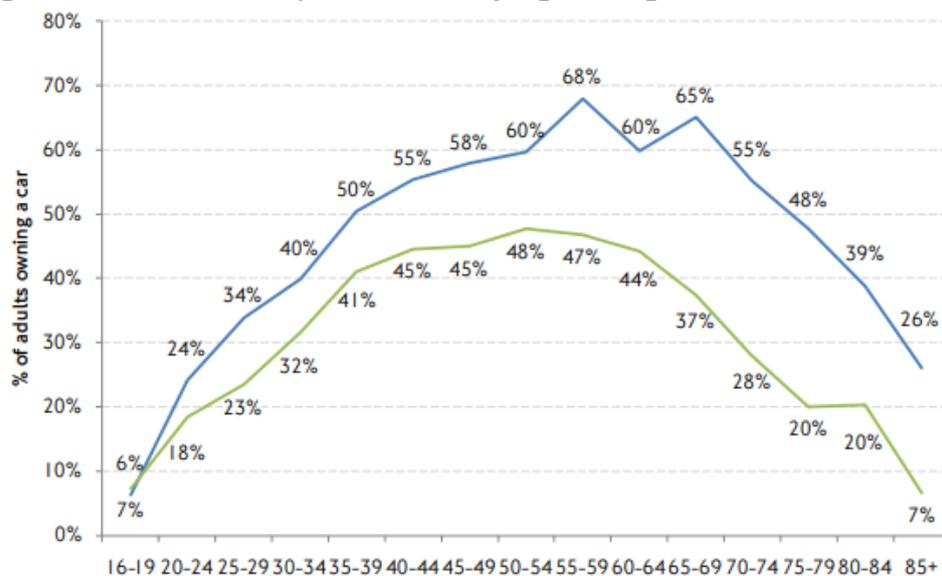
This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

Broadly, car ownership in London increases with age up to around 50-60 years old and then declines beyond that.² However, the proposals to increase the cost of CPZ permits will affect all car users living in these zones equally, regardless of their age.

Figure 1: Car ownership in London by age and gender



Nationally, we know that there has been a large increase in the number of older people in England holding a full driving licence. Between 1995/1997 and 2020 the proportion of people aged 70+ holding a licence increased from 39% to 77%. We are aware that some older people with a pensionable income may have a fixed income and could potentially be disproportionately impacted by increases in CPZ costs. However, it should be noted that permit prices are a relatively small proportion of the cost of running a car when considering other running costs (insurance, fuel, maintenance etc.) Furthermore, as an affordable alternative to car

² <https://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf>

ownership for residents, older people of pensionable age are eligible for free travel across London and free local bus journeys nationally.

Mitigating actions to be taken

No mitigating action identified.

Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include: physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

At the 2011 Census, 47,979 Enfield residents (15.4% of the total) reported a long-term health problem or disability in response to the question, "Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?".

More recent data on disability among the working age population estimated that in the year ending December 2020, 52,700 (nearly 25%) Enfield residents aged 16-64 were estimated to have a disability, higher than London (17.9%) and England (22.4%).³ In terms of our population of children and young people, Enfield currently maintains Education, Health and Care Plans for 3.5% of 0–25-year-olds in Enfield, and around 10.6% of school age children and young people receive Special Educational Needs (SEN) Support at school.

There are currently 11,588 blue badge holders in Enfield, some of whom will live in controlled parking zones. Disabled residents living in CPZ zones with a Blue Badge will not be impacted by an increase in the cost of CPZ permits, as they will be entitled to a free resident's permit. While disabled people who are blue badge holders living out the CPZ, will also be able to park for free in designated bays in the CPZ while displaying their blue badge.

³ Enfield Council, [Borough Profile](#), 2021

To mitigate the impact of the increase of CPZ permits on carers, who care for disabled people living in the CPZ, care permits will remain free of charge to enable a carer regular home visits to residents in a CPZ.⁴

Mitigating actions to be taken

No mitigating action identified.

Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

There is no evidence to suggest this will have an adverse impact on the ground of gender reassignment.

Mitigating actions to be taken

N/A

Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected.

There is no evidence to suggest this will have an adverse impact on the ground of marriage and civil partnership.

Mitigating actions to be taken

⁴ https://www.enfield.gov.uk/_data/assets/pdf_file/0016/4363/carers-permits-terms-and-conditions-parking.pdf

N/A

Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected.

The birth rate in Enfield was 15.1 births per 1000 people in 2016, approximately 28 per cent above the national average that year of 11.8, though on par with the Outer London average of 15.0 per 1000 people. Therefore, there are statistically more likely to be pregnant and maternal people who reside in Enfield than the national average, however this is near equal to Outer London.

It is possible that an increase in permit prices could disproportionately negatively impact those who are pregnant, as they may find it difficult to walk short distances and as such rely on private vehicles for door-to-door transport. However, it should be noted that permit prices are a relatively small proportion of the cost of running a car when considering other running costs (insurance, fuel, maintenance etc.)

Mitigating actions to be taken

No mitigating action identified.

Race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected.

The proposals to increase the cost of CPZ permits will affect all car users living in these zones, regardless of their race.

Enfield's Ethnicity estimates are produced in-house, using data from the 2011 Censuses and the 2019 School Census conducted by the local education authority (LEA). Based on these estimates, residents from White British backgrounds make

up 35.3% of Enfield's inhabitants with other White groups (including White Irish) combined at 26.4%. Mixed Ethnic Groups account for 5.5%, Asian Groups for 11.0% and Black groups for 17.9% of Enfield's population.⁵

Based on average travel modes from the LTDS data in Enfield all ethnic groups except for 'Other Ethnic Group' are more than likely to drive or be driven in a car or van than use any other mode. It is important to note that the sample size of LTDS data is small, therefore these percentages may not precisely reflect the travel behaviours of each ethnic group.

It is possible that the uplift in permits for multiple cars registered at one house may have a disproportionate impact on ethnic minority communities. This is because minority ethnic groups in the UK have greater proportions of multigenerational households compared with the White ethnic group. Which may mean that they are more likely to have multiple cars at one property.⁶ To mitigate this impact, the uplift in 2nd and 3rd permits has been capped at 25%. In addition, the proposal cap on the number of permits per household (rather than per person) is not being implemented at this stage so that its impact to be assessed further.

Mitigating actions to be taken

N/A

Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

There is no evidence to suggest this will have an adverse impact on the ground of religion or belief.

Mitigating actions to be taken

N/A

⁵ Enfield Council, [Borough Profile](#), 2021

⁶<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/adhocs/12005/householdsbyagecompositionandethnicityuk2018>

Sex

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

Please provide evidence to explain why this group may be particularly affected.

According to the Census 2021, in Enfield 52.3% of residents identify as female and 47.7% as male. This is very similar to the percentage split for London as a whole (49 per cent male, 51 per cent female). On average, in London, 46% of men and 34% of women have access to a car.⁷ The proposal to increase the cost of CPZ permits will affect all car users living in these zones, regardless of their sex.

Mitigating actions to be taken

No mitigating action.

Sexual Orientation

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

There is no evidence to suggest this will have an adverse impact on the ground of sexual orientation.

Mitigating actions to be taken

N/A

Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

⁷ <https://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-london.pdf>

Please provide evidence to explain why this group may be particularly affected.

Enfield's IMD ranking compared with the 316 other local authorities in England dropped from 2015 to 2019: Enfield is now the 74th most deprived local authority in England overall, so still within the most deprived 25% of all districts. Enfield's average deprivation score has not worsened. However, Enfield has become relatively more deprived when compared with other London boroughs. In 2015, Enfield was the 12th most deprived borough in London, whereas in 2019 it was the 9th most deprived.

The increase the cost of CPZ permits will affect all car users living in these zones and may have a disproportionate impact on those who are socio-economically disadvantaged. However, it should be noted that permit prices are a relatively small proportion of the cost of running a car when considering other running costs (insurance, fuel, maintenance etc.)

Nationally, we know that car ownership in England depends heavily on household income. According to the Department for Transport's 2019 National Travel Survey, 45% of households in the lowest real income level quintile do not own a car or van compared with 14% of households in the highest real income level quintile.⁸

Furthermore, according to research undertaken by Transport for London, the most commonly used form of transport for Londoners with lower household incomes (below £20,000) is walking. The bus is the next most used form of transport with 69% of people with lower household incomes taking the bus at least once a week compared to 59% of all Londoners. In addition, 42% of Londoners with a household income of less than £20,000 have household access to a car compared with 65% of Londoners overall, declining to 27% of Londoners in the lowest household income bracket (less than £5,000).⁹

Most of the borough provides a good level of public transport accessibility, providing a cost-effective alternative to car ownership. In addition, the Council is investing in improving cycle facilities across the borough, providing a healthy and cheap means of active travel. This will help residents to travel, without car usage.

Mitigating actions to be taken.

N/A

⁸ Department for Transport, [National Travel Survey](#), 2019

⁹ Transport for London, [Travel in London: Understanding our diverse communities](#), 2019

Section 4 – Monitoring and review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

Obtain additional information about uptake of permits by people with different protected characteristics to enable better assessment of impacts in future.

Carry out annual review to ensure that costs/ revenue remain in balance.

The impact of the proposal will be assessed by Parking Services, supported by their contractor (NSL).

Section 5 – Action plan for mitigating actions

Any actions that are already completed should be captured in the equality analysis section above. Any actions that will be implemented once the decision has been made should be captured here.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments
Data on characteristics of permit holders not currently held.	Review options for obtaining better information about characteristics of permit holders.	David Morris	March 2023	TBC	
Possible impact of uplift on 2 nd /3 rd permits on minority ethnic groups.	Monitor up-take of 2 nd /3 rd permits to determine whether impact is greater on certain racial/ethnic groups	David Morris	Quarterly	Absorbed by Service	
Need for regular review of permit prices	Annual reviews of permit prices to ensure cost are being recovered and adjustments can be made in light of monitoring of protected characteristics	David Morris	Annual	Absorbed by Service	