

# Equality Analysis Form

Delivering for Croydon

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## 1. Introduction

### 1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

## 2. Proposed change

<b>Directorate</b>	Sustainable Communities, Regeneration & Economic Recovery Directorate
<b>Title of proposed change</b>	Healthy School Streets
<b>Name of Officer carrying out Equality Analysis</b>	Jayne Rusbatch

## 2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

The council's Parking Policy 2019-2022 aims to effectively manage parking provision across the borough in line with the Corporate Plan and the borough's growth objectives. Section 4 of this policy details the School Streets objectives, to ensure we secure a healthy and safe environment near to schools and to help children and parents use cars less and to walk, cycle and use public transport more. The school run presents a particularly harmful combination of air pollution and inactivity for our children and parents.

The Council introduced the first School Streets schemes in 2017 and in April 2022 re-introduced a further 10 Street schemes under Experimental Traffic Management Order (ETMOs), for a period of 18 months. School streets restrict access for motor traffic except resident permit holders, cyclists, emergency services and certain other groups such as carers and those with disabilities.

The Council is now proposing to introduce a further nine School Streets under ETMO, for a period of 18 months. The first 6 months of this 18 month period are known as "statutory objection period" during which anyone affected by the trial scheme has an opportunity to submit objections while the trial is in operation.

Motor traffic is restricted from entering the School Street at pick up and drop off times, reclaiming road space to create pedestrian and cycle zones. The operational hours for each School Street are 08.00 – 9.30 and 2-4pm Monday to Friday term time only. Times are indicated by traffic signs. School Streets aim to create safer and more pleasant environment outside each school, discouraging travel to school by car and promoting walking, cycling and scooting, achieving positive health outcomes for all.

The changes described allow each school and resident community access to the reclaimed space on the road, changing the way the streets are used. It is hoped that this new use of space by the school and community will support active travel.

Reducing traffic from the school gates also helps to tackle air pollution, which is a significant problem for children and pregnant women. Children are particularly vulnerable to the effects of air pollution and, in the context of School Streets, recent studies have indicated that increases in particulate matter PM2.5 can make individuals more susceptible to the effects of COVID-19, increasing the mortality rate. This is therefore a public health priority. Removing congested traffic and idling vehicles from the immediate vicinity of the school entrance, while creating an environment that encourages families to travel to school more actively, may have positive health outcomes for the school community. It is hoped that increased safety and reduced convenience for those driving will encourage more children and parents to walk, cycle and scoot to school.

## 3. Impact of the proposed change

**Important Note:** It is necessary to determine how each of the protected groups could be impacted by the proposed change. Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

### 3.1 Deciding whether the potential impact is positive or negative

School Streets aim to discourage travel to school by car and promote active travel. This is important as in Croydon, we have a growing issue with obesity in the population, including children. Croydon has the fourth largest proportion of young people in London, with one in four Croydon residents (24.5%) aged between 0-17 years\*. It is known that around 1 in 5 children (21.8%) in reception were overweight or living with obesity, and this position worsens in their last year of primary school (Year 6) where around 2 in 5 children (39.5%) were overweight or living with obesity\*. School Streets create healthy and safe environment near to schools, to encourage modal shift, which will in turn contribute to addressing the obesity issue.

The 65 years plus age group makes up 13.9% of the total population in Croydon. In London, this proportion is smaller at 12.2% and in England it is much bigger at 19.6%\*. There is likelihood that some of this group may be more reliant on vehicular modes of travel, and consequently would be disadvantaged by the proposals in that they could not drive in the School Streets during the operational hours, but this is more than outweighed by the air pollution benefits. Air pollution is an important public health issue contributing to illness and shortened life expectancy, that disproportionately impacts on the most vulnerable in the population, in particular the sick, young and elderly.

The 2011 Census figures showed that 14.1% of the population in Croydon had their day-to-day activities limited to some extent by a long-term health problem or disability. School Streets will not disproportionately impact on this group as eligible residents are able to apply for exemption permits, to allow them (or their nominated carer) to drive in the School Streets during the operational hours.

\* Source: Croydon Observatory [www.croydonobservatory.org](http://www.croydonobservatory.org)

+ Source: *Patterns and trends in child obesity in Croydon; A presentation of 2019/20 NCMP data at local authority level, July 2021*

**Table 1 – Positive/Negative impact**

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.			
Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	<ul style="list-style-type: none"> <li>The school streets schemes treat in general primary school sites, and</li> </ul>	<ul style="list-style-type: none"> <li>For children that may need to be dropped/picked up close to the</li> </ul>	<ul style="list-style-type: none"> <li>Air quality action plan 2017 – 2022.</li> </ul>

	<p>therefore all age groups will benefit from a safer, quieter and clean street scene during pick up/drop off times.</p> <ul style="list-style-type: none"> <li>• The schemes may offer additional space where footways are narrow making areas outside the school gates less congested.</li> <li>• The elderly population may also benefit from such schemes as equally to the younger age groups this will provide them with a quieter street scene where as an example crossing the road outside the school may make it easier without the need to look out for moving traffic.</li> <li>• The scheme benefits people of all ages as it encourages travel to and from school in an active forms such as walking and cycling resulting in better health outcomes.</li> <li>• Public Health (NHS) data shows that Croydon currently have the highest rate of hospital admissions for childhood (0-9 years) asthma in London. 7.5% of premature deaths in Croydon are linked to air pollution. Failing to address NOx and particulate matter emissions in Croydon would deprive many local people of their fundamental right to safe air.</li> <li>• Public Health data shows one in four Croydon residents (24.5%) aged between 0-17 years. It is known that around 1 in 5 children (21.8%) in reception were overweight or living with obesity, and this position worsens in their last year of primary school (Year 6) where around 2 in 5 children (39.5%) were overweight or living with obesity.</li> </ul>	<p>school gates, for reasons such as injuries or disabilities the school street may temporarily be a hindrance. However, the council has made provisions to the schools to request access on their behalf in such circumstances.</p> <ul style="list-style-type: none"> <li>• Conversely, older people may be more reliant on travel by motor vehicle and in some cases journey times may increase as a result of the proposal, but the impact is expected to be limited and outweighed by improvements to safety and air quality</li> </ul>	
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Disability	<ul style="list-style-type: none"> <li>Exemptions apply to all residents who have a vehicle registered to an address within a School Street zone. This includes any residents who may have disabilities.</li> <li>Reducing road danger also has the potential to enable more people to participate in active travel who may previously have been discouraged to do so perhaps because of their disability. For example, cycles can improve mobility and access for disabled people, many of whom do not have access to motor vehicles.</li> <li>If individuals do not have a Blue Badge, additional exemptions may be considered in special circumstances on a case by case basis. For example, to allow a SEN Transport bus to collect a child from a residence within a School Street.</li> </ul>	<ul style="list-style-type: none"> <li>There may be individuals who are not aware that they could be eligible for an exemption even in limited special circumstances. Blue Badge holders are eligible for an exemption, as are residents who have registered carers (the carer's vehicle is exempted). As a mitigation measure the council will inform the public of the potential exemptions they may be able to apply for.</li> </ul>	<p>Air quality action plan 2017 – 2022</p> <p>Blue Badge Scheme</p> <p>Croydon Observatory</p> <p>Disabled Parking Accreditation Scheme in association with Disabled Motoring UK.</p>
Sex	<ul style="list-style-type: none"> <li>The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures</li> </ul>		<p>Air quality action plan 2017 – 2022</p>
Gender Identity	<ul style="list-style-type: none"> <li>The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures</li> </ul>		<p>Air quality action plan 2017 – 2022</p>

Marriage or Civil Partnership	<ul style="list-style-type: none"> <li>The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures</li> </ul>		Air quality action plan 2017 – 2022
Religion or belief	<ul style="list-style-type: none"> <li>The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures</li> </ul>		Air quality action plan 2017 – 2022
Race	<ul style="list-style-type: none"> <li>The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.</li> <li>The proposal is expected to increase participation among under-represented groups in schools that are located in areas of higher deprivation. The schemes may help to create an environment helping to increase the proportion of BAME groups who choose to cycle.</li> </ul>		Air quality action plan 2017 – 2022
Sexual Orientation	<ul style="list-style-type: none"> <li>The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by</li> </ul>		Air quality action plan 2017 – 2022

	implementing parking related measures.		
Pregnancy or Maternity	<ul style="list-style-type: none"> <li>The aim is to improve air quality and reduce exposure to air pollution and reduce the damaging impact that air pollution has on public health and public health challenges for all residents and visitors by implementing parking related measures.</li> </ul>	<ul style="list-style-type: none"> <li>Potential negative impact on parents during pregnancy from the driving restrictions. As a mitigation measure the council can issue temporary exemptions on a case by case basis if needed.</li> </ul>	Air quality action plan 2017 – 2022

**Important note:** You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

### 3.2 Additional information needed to determine impact of proposed change

**Table 2 – Additional information needed to determine impact of proposed change**

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:		
Additional information needed and or Consultation Findings	Information source	Date for completion
Additional information may come to light during the implementation phase of the schemes and will monitor this.		

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

### 3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact )
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

**Table 4 – Equality Impact Score**

<b>Severity of Impact</b>	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	<b>Likelihood of Impact</b>			

**Key**

<b>Risk Index</b>	<b>Risk Magnitude</b>
6 – 9	High
3 – 5	Medium
1 – 3	Low

**Table 3 – Impact scores**

<p><b>Column 1</b></p> <p><b>PROTECTED GROUP</b></p>	<p><b>Column 2</b></p> <p><b>LIKELIHOOD OF IMPACT SCORE</b></p> <p>Use the key below to <b>score</b> the <b>likelihood</b> of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b></p>	<p><b>Column 3</b></p> <p><b>SEVERITY OF IMPACT SCORE</b></p> <p>Use the key below to <b>score</b> the <b>severity</b> of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b> <b>2 = Likely to impact</b> <b>3 = Certain to impact</b></p>	<p><b>Column 4</b></p> <p><b>EQUALITY IMPACT SCORE</b></p> <p>Calculate the <b>equality impact score</b> for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p><b>Equality impact score = likelihood of impact score x severity of impact score.</b></p>
Age	2	2	4
Disability	2	2	4
Gender	1	1	1
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	1	1	1
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	2	2	4

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### 4. Statutory duties

#### 4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

**Important note:** If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

### 5. Action Plan to mitigate negative impacts of proposed change

**Important note:** Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified above (table 1). Attach evidence or provide link to appropriate data, reports, etc.):

**Table 4 – Action Plan to mitigate negative impacts**

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	There may be individuals who are not aware that they could eligible for an exemption even in limited special circumstances.	As a mitigation the council will inform the public of the potential exemptions they may be able to apply for, through communications around the sites at the time of launch and permanently on our website.	Parking	Prior to and at launch of each site Ongoing via the website

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		Review exemptions criteria to ensure no unanticipated impact on protected characteristic group	Parking	12 months after launch
Race		Identify any further data sources to monitor impact and review EqIA	Parking	3 months after decision
Sex (gender)		Identify any further data sources to monitor impact and review EqIA	Parking	3 months after decision
Gender reassignment				
Sexual orientation				
Age	<p>For children that may need to be dropped/picked up close to the school gates, for reasons such as injuries or disabilities, the School Street may temporarily be a hindrance.</p> <p>Conversely, older people may be more reliant on travel by motor vehicle and in some cases journey times may increase as a result of the proposal.</p>	<p>The council has made provisions for the schools to request access on their behalf in such circumstances.</p> <p>The impact on older people is expected to be limited and outweighed by improvements to safety and air quality.</p>	Parking	Ongoing (process already in place)
Religion or belief				
Pregnancy or maternity	Pregnant parents would be restricted from driving in the School Street.	As a mitigation measure the council can issue temporary exemptions on a case by case basis where needed. The council will inform the public of the potential exemptions they may be able to apply for, through communications around the sites at	Parking	Prior to and at launch of each site Ongoing via the website

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		the time of launch and permanently on our website.		
Marriage/civil partnership				

### 6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter <b>X</b> in column 3 ( <b>Conclusion</b> ) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	<p>Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review.</p> <p>Extensive communication with the teachers and families of each school, as well as local -residents and businesses within the affected area, will take place before the trial period begins. Feedback and queries are monitored on an ongoing basis via the dedicated School Streets mailbox for each scheme. Changes in numbers of children travelling to school by car and travelling actively will be monitored by the school through hands up surveys on a termly basis Hands up surveys from each school will also be used as a way of measuring levels of active travel before and after each scheme has been implemented.</p> <p>Each scheme is being implemented on a trial basis. If a scheme receives overwhelmingly negative feedback or is deemed to pose a risk to those using the Pedestrian and Cycle Zone, the trial can be reviewed and stopped at any time.</p>	
Adjust the proposed change	<p>We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form; The introduction of the School Streets will be under an Experimental Traffic Management Order, and hence this gives the council the ability to adjust the proposals should it be identified during the initial 6 month objection period, that they are having an adverse effect on any of the identified groups.</b></p>	<b>X</b>

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Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. <b>If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.</b>	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Cabinet Date: 12 October 2022

## 7. Sign-Off

<b>Officers that must approve this decision</b>	
<b>Equalities Lead</b>	<b>Name:</b> Barbara Grant on Behalf of Denise McCausland <b>Date:</b> 9 <sup>th</sup> September <b>Position:</b> Programme Manager (PMO)
<b>Director</b>	<b>Name:</b> <b>Date:</b> <b>Position:</b>