

Colchester Borough Council

Equality Impact Assessment Form - An Analysis of the Effects on Equality

Section 1: Initial Equality Impact Assessment

Name of policy to be assessed: Colchester Borough Council Car Parks Service

Budget Strategy Theme – Service Provision

1. What is the main purpose of the policy?

- To provide a comprehensive, efficient and customer responsive car park service

2. What main areas or activities does it cover?

- Development of car parking strategies and policies
- Management of car parks
- Enforcement of off-street parking regulations
- Back office support systems for all car parks operations

3. Are there changes to an existing policy being considered in this assessment? If so, what are they?

The theme involves various workstreams which propose a variety of changes including procurement savings, reviewing outsourced sharing support services, reviewing operating models and organisational structures, deleting vacant posts and reviewing and reducing service levels in line with the resources available.

4. Who are the main audience, users or customers who will be affected by the policy?

- All residents, businesses and visitors to Colchester Borough

5. What outcomes do you want to achieve from the policy?

- To provide a framework for the provision of car park services.
- To provide effective and efficient services
- To enable staff to be well informed and motivated
- To support the local economy
- To support the corporate priority of ‘congestion busting’

6. Are other service areas or partner agencies involved in delivery? If so, please give details below.

- North Essex Parking Partnership

7. Are you aware of any relevant information, data, surveys or consultations¹ which help us to assess the likely or actual impact of the policy upon customers or staff? *If so, provide details and include a link to the document or source where available.*

A full internal and external consultation will be undertaken covering all proposals made as part of the overall budget strategy and this will be use to help understand the impact of these proposals on customers and staff.

8. The ‘general duty’ states that we must have “due regard” to the need to:

- eliminate unlawful discrimination, harassment and victimisation
- advance equality of opportunity between people who share a ‘protected characteristic²’ and those who do not³
- foster good relations between people who share a ‘protected characteristic’ and those who do not⁴

Not all policies help us to meet the ‘general duty’, but most do.

¹Click on [Customer Insight](#) for more information. The Council’s surveys and consultations include ‘equality monitoring information’ to help us identify any particular concerns or views expressed by any particular group or ‘protected characteristic’. It can also help us to assess how representative of our customers the respondent group is. Local data on the ‘protected characteristics’ is available [on this page](#) of Sharepoint.

² The Equality Act’s ‘protected characteristics’ include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief and sex and sexual orientation. It also covers marriage and civil partnerships, but not for all aspects of the duty.

³ This involves having due regard, in particular, to the need to: (a) remove or minimise disadvantages suffered by persons who share a ‘protected characteristic’ that are connected to that characteristic; (b) take steps to meet the needs of persons who share a relevant ‘protected characteristic’ that are different from the needs of persons who do not share it, and (c) encourage persons who share a relevant ‘protected characteristic’ to participate in public life or in any other activity in which participation by such persons is disproportionately low.

⁴ This involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding.

This theme does not specifically help to meet the general duty as it details various budget savings proposals.

The policy helps us to ‘eliminate unlawful discrimination, harassment and victimisation’ in the following way(s):

- Disabled parking bays provided, various long and short stay car parks in multiple areas, car share bays, parent and child bays.

The policy helps us to ‘advance equality of opportunity...’ in the following way(s):

- N/A

The policy helps us to ‘foster good relations...’ in the following way(s):

- N/A

9. The Council has an important role in improving residents’ health under the Health and Social Care Act 2012. This relates to both its ‘core functions’ (such as housing, leisure, green spaces and environmental health) and to its ‘enabling roles’ (such as economic development, planning and engaging with communities)⁵. The Council recognises that its Public Sector Equality Duty and its role in improving health are interrelated and mutually supportive. This is especially true across the ‘protected characteristics’ of age and disability.

“Health inequalities are the unjust and avoidable differences in people’s health across the population. They come from the unequal distribution of income, wealth and power and influence the wider determinants of health such as work, education, social support and housing. Currently, in England people living in the least deprived areas will live around 20 years longer in good health than those in the most deprived areas. Reducing health inequalities means giving everyone the same opportunities to lead a healthy life, no matter where they live or who they are.”

Where applicable, explain how this policy helps us to improve health/reduce health inequalities for residents:

This theme does not specifically help to improve health inequalities as it details various budget savings proposals.

Parking for Blue Badge holders in more convenient locations will help to reduce health inequalities which would prevent these users from accessing services which others can access freely.

⁵ The King’s Fund: [The district council contribution to public health: a time of challenge and opportunity, 2015](#)

Electric Vehicle charging points will also be added to certain locations, which is a benefit to the health of all local residents.

NHS permits are available to NHS staff duringn the pandemic, enabling them to park within our car parks free of charge to perform their duties locally.

10. This section helps us to identify any disproportionate equality impacts. Please indicate in the table below whether the policy is likely to particularly benefit or disadvantage any of the 'protected characteristics'.

'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
Age	Older people (60+)			Yes	Due to reduced mobility, some older people may find it more difficult to navigate into and out of car parks
	Younger people (17-25) and children (0-16)	Yes	'Parent and Child' spaces in St. Mary's car park & Britannia car park creating easier access	No	
Disability	Physical	Yes	Disabled bays within car parks in the most convenient locations for access, for those with Blue Badges.	Yes	People with a physical mobility disability may find it more difficult to navigate into and out of car parks Some people with certain disabilities such as limb problems may find it difficult to use car park machinery such as taking a ticket on entry or using a pay and display machine.
	Sensory	Yes	As above, if a Blue badge in place.		
	Learning	Yes	As above, if a Blue badge in place.	Yes	People with dyslexia or who have problems reading may not understand available information displayed in car parks. See further below.

'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
	Mental health issues				
	Other – <i>specify</i>			Yes	Those on Low Income may Struggle to afford parking prices, this may deter them from regularly using the car parks
Ethnicity ⁶	White				
	Black				
	Chinese				
	Mixed Ethnic Origin				
	Gypsies/ Travellers				
	Other – <i>specify</i>				
Language	English not first language			Yes	Yes because translation services are not available directly in the service and this will negatively impact on those for which English is not their first language.
Pregnancy and Maternity	Women who are pregnant or have given birth in last 26 weeks	Yes	'Parent and Child' spaces in St. Mary's car park & Britannia car park creating easier access.	Yes	Some pregnant women and those with small children may find it hard to get in and out of a car within a normal width parking bay.
Religion or Belief	People with a religious belief (or none)			Yes	The park for free charge on Sunday morning has been removed from Britannia, Vineyard Street and Priory Street car parks so that the charge in these car parks is consistent all day at 50p. Although church goers may see this as having a negative impact on them it is being applied equally to all car park users.

⁶ National Census 2011 categories are: Bangladeshi, Indian, Pakistani, Other Asian (Asian or Asian British), African, Caribbean, Other Black (Black or Black British), White and Black African, White and Asian, White and Black Caribbean (Mixed), British, Irish, Other White (White), Chinese, Other (Other Ethnic Group).

'Protected characteristic' group		Positive Impact	Explain how it could particularly benefit the group	Negative Impact	Explain how it could particularly disadvantage the group
Sex	Men				
	Women	No	N/A	Yes	The job roles that would be removed by these proposals currently have a greater proportion (57%) of female employees in post than male. The overall gender balance for Council Employees is 50/50 male/female.
Gender Reassignment ⁷	Transgender/ Transsexual				
Sexual Orientation	Bisexual, Heterosexual, Gay or Lesbian				
Marriage and Civil Partnership	People who are married or in a civil partnership				

11. If you have identified any negative impacts (above), how can they be minimised or removed?

The impact on younger people is a potential impact rather than actually impacting on individuals as the 2 apprentice posts that are proposed to be reduced are currently vacant.

The impact on Women highlighted above is difficult to mitigate as a greater number of our back-office support roles are undertaken by female members of staff. The most significant proportion of male staff work in frontline services such as Neighbourhood Services and these have been protected through these proposals.

12. Could the policy discriminate⁸ against any 'protected characteristic', either directly or indirectly⁹?

⁷ The 'protected characteristic' of gender reassignment is defined by the Equality Act 2010 as "a person proposing to undergo, is undergoing or has undergone a process (or part of a process) for the purpose of reassigning the person's sex by changing physiological or other attributes of sex." This is a personal process that may involve medical interventions such as counselling, psychotherapy, hormone therapy or surgery, but does not have to.

⁸ The Council has a general duty to 'eliminate unlawful discrimination, harassment and victimisation'. Direct discrimination occurs when a person is treated less favourably than another in a comparable situation because of their 'protected characteristic' whether on grounds of age, disability, pregnancy and maternity, ethnicity;

- No

Summary and findings of Initial Equality Impact Assessment

13. Please put a tick in the relevant box to confirm your findings, and what the next step is:

Findings	Action required
A. No negative impacts have been identified <input type="checkbox"/>	Sign off screening and finish.
B. Negative impacts have been identified but have been minimised or removed x <input checked="" type="checkbox"/>	Sign off screening and finish.
C. Negative impacts could not be minimised or removed <input type="checkbox"/>	Sign off screening and complete a full impact assessment – Section 2.
D. There is insufficient evidence to make a judgement <input type="checkbox"/>	Sign off screening and complete a full impact assessment – Section 2.

14. Name and job title of person completing this form:

Emma Day, Office Manager

15. Date of completion:

16 January 2021

16. Date for update or review of this screening¹⁰: 13 January 2024

religion or belief; sex (gender), sexual orientation, or marriage and civil partnership. Indirect discrimination occurs when an apparently neutral provision or practice would nevertheless disadvantage people on the grounds of their 'protected characteristic'.

⁹ If you answer 'yes' to question 11 (above) you will need to complete the following section *and* go on to complete Section 2 in order to conduct a full Equality Impact Assessment.

¹⁰ This is normally three years, but not always: You may know that the policy itself will be reviewed earlier in which case the EqIA should be reviewed at that time. Or, in the case of a five year strategy, you may want to have a review date of five years. In the case of a "one off" decision, such as closing a service, a review date may not be needed - in which case you should indicate 'N/A'. In any event, the review date should be brought forward if you receive information or feedback which raises new concerns, or if the public policy context changes. You can speak to the [Equality and Safeguarding Co-ordinator](#) for more advice.

If you have selected A or B (above), you have completed the assessment and can remove this paragraph and everything that appears below. In this case please:(a) send a copy to the relevant Assistant Director and the Equality and Safeguarding Officer; (b) arrange for it to be published on the Council's website [here](#) (under the relevant service area heading); and (c) update the Corporate Spreadsheet by clicking [here](#) and selecting and updating the first document. If you have selected C or D (above), you must complete Section Two (below).

Section 2: Full Equality Impact Assessment

Where there is a negative impact which has not been minimised or removed

17. If you have identified negative impact(s) on the ‘protected characteristics’ that have not been minimised or removed, is this considered to be ‘a proportionate means of achieving a legitimate aim’¹¹? If yes, state how:

If a negative impact cannot be minimised or removed and cannot be objectively justified as being ‘a proportionate means of achieving a legitimate aim’, the policy should not be implemented as it could unlawfully discriminate.

Where there is insufficient evidence to make a judgement

If you identified that there was insufficient evidence to make a judgement on whether there are any negative impacts on the ‘protected characteristics’, please complete the first column of the Action Plan below.

Engagement and Consultation Action Plan

		Details of Planned Engagement	Date for Review	Summary of findings
Age	Older people (60+)			
	Younger people (17-25) and children (0-16)			
Disability	Physical			
	Sensory			
	Learning			

¹¹ This phrase is taken from sections 15 and 19 of the Equality Act 2010. ‘Positive action’, benefitting one or more ‘protected characteristic’(s), may result in a disproportionate negative impact upon another, but this may be justified as being ‘a proportionate means of achieving a legitimate aim’. The need to balance a budget can constitute a “legitimate aim”. Contact the Equality and Safeguarding Co-ordinator for more information or look at the [Equality and Human Rights Commission](#) webpage under “objective justification”.

		Details of Planned Engagement	Date for Review	Summary of findings
	Mental health issues			
	Other – <i>specify</i>			
Ethnicity	White			
	Black			
	Chinese			
	Mixed Ethnic Origin			
	Gypsies/ Travellers			
	Other – <i>specify</i>			
Language	English not first language			
Pregnancy and Maternity	Women who are pregnant or have given birth in last 26 weeks			
Religion or Belief	People with a religious belief (or none)			
Sex	Men			
	Women			
Gender Reassignment	Transgender/ Transsexual			
Sexual Orientation	Bisexual, Heterosexual, Gay or Lesbian			
Marriage and Civil Partnership	People who are married or in a civil partnership			

If your answer to question 16 (above) is ‘no’, this policy could be unlawfully discriminatory against a ‘protected characteristic’. You should not implement this policy. Otherwise, you may implement the policy, taking care to review its impact based on planned engagement. The Review should be carried out within 6 months from the date of this Full Impact Assessment, at which point a further Review may or may not be required depending on whether you have collected sufficient evidence.

Summary and findings of Full Equality Impact Assessment

18. Please put a tick in the relevant box to confirm your findings, and what the next step is:

Findings	Action required
Likely negative impacts have been identified but are considered to be a proportionate means of achieving a legitimate aim. <input type="checkbox"/>	Sign off and finish.
Further planned engagement with equality target groups will take place in order to gain sufficient evidence to make a judgement on impact. <input type="checkbox"/>	Sign off and review within 6 months.
Planned engagement has taken place: No likely negative impacts have been identified. <input type="checkbox"/>	Sign off and finish.
Planned engagement has taken place: Likely negative impacts have been identified but have been minimised or removed. <input type="checkbox"/>	Sign off and finish.
The policy could be unlawfully discriminatory and will not be implemented. <input type="checkbox"/>	Finish without signing off.

19. Name and job title of person completing this form:

Richard Walker

20. Date of completion:

21. Date for update or review of this screening:

If you have now signed off this full assessment, please (a) send a copy to the relevant Head of Service and the Equality and Safeguarding Officer (b) arrange for it to be published on the Council's website [here](#) (under the relevant service area heading) and (c) update the Corporate Spreadsheet by clicking [here](#) and selecting and updating the first document.