

# Equality Impact Assessment [version 2.9]



Title– Advisory Disabled Bays Service Review - GR15	
<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth and Regeneration – Management of Place	Lead Officer name: David Bunting
Service Area: Traffic & Highways Maintenance	Lead Officer role: Head of Service

## Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](http://sharepoint.com).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

### 1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

<p>The purpose of this proposal is to save the Council the cost of installing advisory disabled bays currently around c£100K per annum, by either stopping the service or charging the householder a charge for installation. This proposal is not profit led and will only recover the actual costs incurred. All installation work is undertaken by contractors so there would be no internal expenditure savings to be made.</p> <p>The scheme the City Council administers is purely residential and is designed to allow disabled residents who have no reasonable off-street parking the ability to park their vehicles as close to their residences as possible, or provide white access markings in front of a drive / access way.</p> <p>Disabled white markings provided under this scheme are advisory only and have no legal standing / enforcement capabilities and so whilst a bay would clearly be intended for one individual, it is also open to other disabled drivers to use. Bristol City Council is unable to provide any form of enforcement to secure the use of an advisory bay, or prevent the blocking of a drive / access way.</p>
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### 1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input checked="" type="checkbox"/> Commissioned services	<input type="checkbox"/> City partners / Stakeholder organisations	
Additional comments: All residents who are eligible for the advisory bays would be affected.		

### 1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	[please select]
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## Step 2: What information do we have?

### 2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

<b>Data / Evidence Source</b> [Include a reference where known]	<b>Summary of what this tells us</b>
Bristol Disability statistics, Disabled population in Bristol Source: ONS 2011 Census Age Population	17% of people in Bristol are disabled. Day-to day activities not limited (All ages) 356,510 / 83% Day to day activities limited 7% Day-today activities limited a lot (All ages 34,570) 8.% Day to day activities are limited a lot - 31% of disabled people are over 65 years of age 12.1 % of disabled people are 50-64 3.6% of disabled people are 16-49 1.7 % of disabled people are 0-15
Blue Badge Scheme, Statistics, England 2019	There were 2.29 million Blue Badges held in England as at 31 March 2019, a decrease of 59,000 Blue Badges (2.5%) since 2018. 2.29 million Blue Badges held 2.5% since March 2018 As at 31 March 2019, 4.1% of the population held a Blue Badge, compared with 4.2% in 2018.

<p><u>Department for Transport Statistics 2019/2020</u></p> <p>Internal data</p>	<p>Eligibility criteria requires applicants must have a Blue Badge for an Advisory Disabled Bay to be installed. We know that 7,247 citizens were issued with Blue Badges in Bristol last year</p> <p>There are currently 18,142 valid Blue Badges issued by Bristol City Council. They were issued for the following reasons:</p> <p>2% - Severe Sight Impairment (Blind)  5% - Hidden disabilities  12% - Disability Living Allowance  27% - Personal Independence Payment  54% - Walking Disability</p> <p>Applications are made through a national system and we are unable to profile this data by age, ward or any other characteristic.</p>
<p>Quality of life survey 2020, % of residents for whom accessibility issues stop them from being involved in the community</p>	<p>15.9% of disabled people state that accessibility issues stop them from being involved in their community. A high percentage of disabled people feel they are not able to get involved with their community due to accessibility issues.</p>
<p>Quality of Life Survey, 2020 % of residents for whom transport issues stop them from getting involved in their community</p>	<p>20% of disabled people state that transport issues stop them being involved in the community. Disabled people are overrepresented in their dissatisfaction on how well they can use transport to support them getting involved in their communities.</p>
<p>Quality of Life Survey 2020 % of residents for whom inaccessible transport stops them from leaving their home.</p>	<p>16% of disabled people state that inaccessible transport stops them from leaving their home, compared to 8% of people over 65. With 17% of disabled people in Bristol, this figure is very high, so nearly all disabled people say transport is inaccessible for them.</p>
<p><u>Disabled People in Employment</u></p>	<p>The ONS have reported that a higher proportion of disabled employees have been made redundant than employees who are not disabled. In July-November 2020, 21.1 per thousand disabled employees were made redundant, compared to 13.0 per thousand employees who are not disabled.</p>
<p><u>Disability Pay Gap research (TUC)</u></p>	<p>The UK Disability pay gap is 20% (2020).  Research showed women earn less than men.</p>
<p><b>Additional comments: see below</b></p> <p>Applicants for Advisory Disabled Parking Bays must meet the following criteria:</p> <ul style="list-style-type: none"> <li>• have a valid Blue Badge</li> <li>• live at the address where the bay is required</li> <li>• regularly use a vehicle which is kept at that address</li> <li>• struggle to park near your home ie there is strong demand for local on street parking.</li> <li>• not have suitable off-street parking, such as a drive or garage</li> </ul>	

On average there are 190 successful applications per year:

Post Code	Average
BS1	0
BS2	5
BS3	19
BS4	26
BS5	39
BS6	7
BS7	19
BS8	3
BS9	5
BS10	10
BS11	14
BS13	15
BS14	9
BS15	4
BS16	16
Total	190

Please note, we do not allow disabled bays in the Controlled Parking Zone in the city centre. There are a small number of statutory public bays in this area, but Blue Badge holders can park for free in most on street city centre locations and in all BCC pay and display car parks.

### IMD2019 Bristol Deprivation Decile

- BS4 Fillwood – Most deprived area in Bristol
- BS5 Lawrence Hill/ Stoke Croft West – Most deprived wards in Bristol
- BS10 Southmead / Bentry - Most deprived wards in Bristol
- BS11 Avonmouth – Most deprived wards in Bristol
- BS13 Hartcliffe and Withywood – Most deprived wards in Bristol
- BS14 Hengrove and Witchurch Park - Most deprived wards in Bristol
- BS16 – Frome Vale/ Hillfields – Most deprived wards in Bristol

We can see from our figures that the highest number of applicants who request and are granted a disabled parking bay are in the most deprived wards in Bristol. This proposal will impact people who also live in deprived areas of Bristol.

## 2.2 Do you currently monitor relevant activity by the following protected characteristics?

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> Age                 | <input checked="" type="checkbox"/> Disability | <input type="checkbox"/> Gender Reassignment |
| <input type="checkbox"/> Marriage and Civil Partnership | <input type="checkbox"/> Pregnancy/Maternity   | <input type="checkbox"/> Race                |
| <input type="checkbox"/> Religion or Belief             | <input checked="" type="checkbox"/> Sex        | <input type="checkbox"/> Sexual Orientation  |

## 2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

We do not have a breakdown of all the protected characteristics apart from disabled people, their age in respect to the general population of Bristol and sex in relation to national statistics. The area the EqiA has focused on includes the data we have on disabled people, their impairment and what ward they live in.

## 2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

We have not engaged with stakeholders about this savings proposal at this stage. However, we will consult with our internal Staff led group, Disabled Employees Group and partners such as WECIL prior to any further development / implementation.

## 2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

We are the formative stage of this proposal, we will liaise with internal Staff led group, the Disability Equality Commission, WECIL and Bristol Disability Equality Forum about our proposals which are still at a formative stage.

## Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above, and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

### 3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

**GENERAL COMMENTS** (highlight any potential issues that might impact all or many groups)

<b>PROTECTED CHARACTERISTICS</b>	
<b>Age: Young People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We do not have the age breakdown for this cohort at this stage
Mitigations:	
<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Older people are more likely to be Blue Badge holders, although not necessarily more likely to need an advisory disabled bay.
Mitigations:	The charge for the installation of the bays could be means tested which could mitigate the impact. This could however mean the potential savings would not be fully realised. The older population are more like to be receiving a pension, and on a lower income.
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<p>Although the signage is advisory (it is not enforceable if someone decides to ignore the signage and park in a marked bay) the service advances equality of opportunity for disabled residents by increasing the likelihood they are able to park directly outside their home</p> <p>Therefore, if the currently free service becomes charged-for it is likely to have a disproportionately negative impact on disabled citizens. Although disabled people are less likely to be car owners overall, we know many disabled people are reliant on having their own transport and may not be able to travel long distances independently or find public transport accessible.</p>
Mitigations:	Whilst the disproportionate impact for disabled people cannot be fully mitigated, we note that Blue badge holders (all eligible applicants) can currently park in any residential or pay and display bay without charge or time restrictions unless the parking bay is marked for a specific use ie: EV charging, Permit holder only or in a Loading Bay - however these bays may not be directly outside of the resident's home and could involve a short walk to their vehicle. We also note the option of providing concessionary reductions or waiving of fees for low income households (see 'Deprivation' below.
<b>Sex</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Sexual orientation</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Pregnancy / Maternity</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	See above
<b>Gender reassignment</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Race</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Religion or Belief</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Marriage &amp; civil partnership</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	

**OTHER RELEVANT CHARACTERISTICS**

<b>Socio-Economic (deprivation)</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	There is some potential for Blue Badge Holders living in low-income households to be adversely affected by any introduction of charges. There may also be some correlation between areas of deprivation and increased reliance on street parking (ie less properties with driveways or residents with less financial means to install driveways). This would mean if they live in an area where there are parking permit require they would be charged twice.
Mitigations:	The charge for the installation of the bays could be means tested which could mitigate the impact. This could however mean the potential savings would not be fully realised.
<b>Carers</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	There is some potential for Blue Badge Holders living in low-income households to be adversely affected by any introduction of charges, and affect the people who care for them.
Mitigations:	The charge for the installation of the bays could be means tested which could mitigate the impact. This could however mean the potential savings would not be fully realised.
<b>Other groups</b> [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	
Mitigations:	

### 3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

Efficient transport policies which reduce congestion and improve public transport efficacy and air quality will improve the environment for all residents and visitors to the city. Whilst Council's policies are generally focussed on reducing the dependence on the private car and encouraging those who can, to use alternative, more sustainable means of transport it is acknowledged that Blue Badge holders have a greater dependency on the private car and that ease of access to that vehicle can greatly improve their quality of life.

We acknowledge the provision of advisory disabled bays is not a statutory requirement and although the Council could withdraw the service, it is felt that it would be better to offer a chargeable service instead. We also know that this proposal would not advance equality of opportunity and so we have suggested some mitigations considering this.

## Step 4: Impact

### 4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

#### Summary of significant negative impacts and how they can be mitigated or justified:

The proposal is likely to have a disproportionate impact on disabled people and their carers – especially those living in low income households unless there are concessions / waived fees on this basis.

#### Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

No significant positive impact identified. The Council is currently under a legal direction to improve Air Quality in the City Centre, although not all bays are located in the City Centre. The Council has a duty to deliver on its transport policy and to encourage a modal shift away from using the motor car to use of more sustainable modes of transport.

## 4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Speak with Staff Led groups, and external partners about the proposals to introduce fees for disabled people.	Sarah Clark	January 2022 onwards
Obtain better data on the use of disabled parking and in which wards in the city, and which protected characteristic groups are successful in obtaining the bays.	Sarah Clark	January 22 onwards

## 4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

Monitoring of Advisory Disabled Bay requests, and relevant Quality of Life indicators.

## Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director<sup>1</sup>.

<b>Equality and Inclusion Team Review:</b> Reviewed by the Equality and Inclusion Team	<b>Director Sign-Off:</b> 
Date: 5 January 2022	Date: 5 January 2022

<sup>1</sup> Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.