

Equality Impact Assessment [version 2.9]



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|--|---|
| Title: RPS Permit & Tariff Changes 2021 updated | |
| <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.

Bristol’s Resident Parking Schemes (RPS) were introduced between c2011 and c2016. Permit structures and prices were standardised in 2015 and each new scheme either adopted the standardised structure from the outset or was changed during the initial scheme reviews. Easton & St Philips RPS was the last scheme to undergo its initial scheme review and the timing coincided with the Mayor’s electoral pledge not to increase RPS charges during his initial term in office. So while ES RPS was reviewed, the structure and prices applied to ES RPS could not be changed.

Parking Services are now seeking approval to apply an inflationary increase to RPS permit and Pay & Display charges, to follow on from a similar review of parking charges in the Controlled Parking Zone that was implemented this year. It is important for our ability to meet our traffic management policy objectives in terms of promoting short stay parking through the turnover of spaces and the encouragement of a modal shift to more sustainable travel choices through the deterrent factor of parking charges, that those charges remain relative in real terms. This is the primary objective of the current tariff report.

However, officers are acutely aware of the anomalous situation in Easton & St Philips and that residents and businesses in that area are currently being treated differently to all other RPS. We are using this opportunity to seek guidance on whether we should now take the opportunity to bring ES RPS in line with the other RPS areas so that the RPS are applied consistently and fairly across the city and so that any differences between the zones are the result of policy-based decisions only.

The changes will have an impact on citizens in ES RPS, but it’s important to record that these citizens are being treated differently to other citizens at the moment and that this change is intended to remove those anomalies to ensure that all citizens are treated equally.

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 type="checkbox"/> Commissioned services | <input type="checkbox"/> City partners / Stakeholder organisations | |
| Additional comments: All residents and businesses located within ES RPS and potentially all visitors too. | | |

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.

Yes **No** [please select]

Pay & Display parking will become more expensive – increasing from £1/hour to £1.30/hour. Parking Permits & Visitor Vouchers will increase by approximately 17% to reflect inflation since they were first set. These changes will apply to all RPS.

In ES RPS the additional changes will be as follows:

The maximum stay for Pay & Display parking will increase from 2 hours to 3 hours.

The figures in the following section are current prices before the inflationary increase is added:

Residents will still be entitled to up to 3 residential permits but the price of these will be brought in line with the other scheme areas:

- First permit prices will be based on vehicle emissions, so a current permit that costs £30 in ES RPS will cost between £24 and £72 depending on vehicle emissions (the majority of vehicles will be mid- range and will cost £48).
- Second permit prices will increase from £80 to £96.
- Third permit prices will decrease from £200 to £192

Business will still be entitled to up to 7 permits but instead of the current allowance of up to 2 business permits and up to 5 customer permits, businesses will be able to choose their own mix of business and customer permits.

A first business permit in ES RPS currently costs £100 and a second permit costs £200. The standard price for a full price business permit in other scheme areas is £240 each.

A customer permit in ES RPS is currently £100 compared to £250 for a full price customer permit in other scheme areas.

Discounted business and customer permits are not currently offered in ES RPS. Adopting the standard rules for other schemes would mean we are able to offer business and customers discounted rates of £140 for a business permit and £150 for a customer permit. The discounted rate is available to any school, a charity, place of worship or businesses in receipt of full small business rate relief.

Because of these increased costs there is a potential for citizens and/or businesses to be affected by this proposal.

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](#)

| Data / Evidence Source [Include a reference where known] | Summary of what this tells us |
|--|---|
| Ward Statistical Profile for Lawrence Hill | <p>Age is generally not statistically different to Bristol. There are more people aged 0-15 and less people aged 55+ compared to Bristol as a whole.</p> <p>The area is in the lowest deprivation percentiles and has the highest level of child poverty.</p> <p>Over 55% of households do not have a vehicle – Lawrence Hill has the lowest levels of car ownership in Bristol.</p> <p>Lawrence Hill has the highest proportion of Black, Asian and minority ethnic residents (60%)</p> |
| Quality of Life Survey 2020 % Of self-employed and run their own business in Lawrence Hill and Ashley | <p>15% of people in Bristol own their own business</p> <p>16% of Asian, British own their own business or are self employed</p> <p>9% Black British own their own business or are self employed</p> <p>13% white minority ethnic own their own business or are self employed</p> <p>15% white British own their own business or are self employed</p> <p>9.2% Black British own their own business or are self employed</p> <p>There are a large number of ethnic groups who would be affected by this change due to introduction of parking charges in this area</p> |
| Quality of Life Survey 2020 % of people who find it hard to manage financially | <p>21% of people in this ward find it hard to manage financially, compared to the Bristol average of 14%</p> |
| Quality of Life Survey 2020 % of people who use their local area to go shopping | <p>47.4% of Bristol use their local shopping area to shop</p> <p>65+ years 54%</p> <p>All religions 57%</p> <p>The groups above are more likely to be affected by any change to parking measures</p> |
| Additional comments: | |

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 checked="" type="checkbox"/> Race |
| <input type="checkbox"/> Religion or Belief | <input checked="" type="checkbox"/> Sex | <input checked="" 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 currently measure protected characteristics of service users in RPS areas specifically, however we have Ward level diversity data for most characteristics, and LSOA data for economic deprivation.

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.

Full consultation took place when the RPS were introduced and at the time of the formal scheme reviews. Affected groups have not been involved or consulted at this time, because Cabinet are being asked to approve this change as a matter of policy – that ES RPS should not operate on different terms to other scheme areas. This is to stop residents and businesses getting different treatment, however where areas of deprivation prevail this should also be considered. A resident of other scheme areas should not have to pay more for a first permit than a resident of ES RPS does but if the scheme is newly introduced there could be merited to do so. Businesses in ES RPS should not be given preferential treatment in terms of cheaper permits than businesses in other parts of the city, unless we stagger the payments according to areas of deprivation. The process to change Traffic Regulation Orders to apply the inflationary increase does not require consultation, however the legal process required to change the ES RPS Traffic Regulation Order will require full Statutory Consultation. Any objections to the changes will be considered by the Director, Economy of Place before making any final decision to implement the changes. At this time we are not considering any wider review of ES RPS or indeed RPS in general.

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.

Any future reviews of the RPS (and which would include public consultation) would consider any broader or scheme specific changes to the way the RPS operate. The change at this time is simply to bring ES RPS in line with other areas and apply an inflationary uplift to Pay & Display and Parking Permit charges.

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.

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| GENERAL COMMENTS (highlight any potential issues that might impact all or many groups) | |
| The proposal will increase the cost of permits and pay & display parking and will therefore affect all groups, although those on fixed or low incomes will be disproportionately affected. We note that ES RPS falls with Lawrence Hill Ward and although this area has the highest deprivations levels it also has the lowest car ownership levels. | |
| PROTECTED CHARACTERISTICS | |
| Age: Young People | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| Potential impacts: | |
| Mitigations: | |
| Age: Older People | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| Potential impacts: | Some older people who are less mobile and less able to walk significant distances may be disproportionately impacted by additional costs |
| Mitigations: | We note that ES RPS falls with Lawrence Hill Ward and although this area has the highest deprivations levels it also has the lowest car ownership levels. |
| Disability | Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Potential impacts: | Some people with impairments or disabilities who do not have Blue Badges but who are still dependent on a motor vehicle or as a driver or passenger may be disproportionately impacted by additional costs |
| Mitigations: | We note that ES RPS falls with Lawrence Hill Ward and although this area has the highest deprivations levels it also has the lowest car ownership levels. |
| Sex | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| Potential impacts: | |
| Mitigations: | |
| Sexual orientation | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| Potential impacts: | |
| Mitigations: | |
| Pregnancy / Maternity | Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Potential impacts: | People who are dependent on a motor vehicle as a driver or passenger because they are pregnant or have young children may be disproportionately impacted by additional costs |
| Mitigations: | We note that ES RPS falls with Lawrence Hill Ward and although this area has the highest deprivations levels it also has the lowest car ownership levels. |
| Gender reassignment | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| Potential impacts: | |
| Mitigations: | |
| Race | Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Potential impacts: | Although car use is relatively low in the Lawrence Hill Ward any proposal to increase RPZ cost will disproportionately impact on Black, Asian and minority ethnic residents on the basis of their higher representation (59.6% compared to 16% for Bristol overall). Additionally, a high proportion (29%) of residents do not speak English as main language. |
| Mitigations: | We will ensure that any changes are proportionate and any increase to RPZ costs have a robust communications plan to ensure we provide clear inclusive and accessible information in a range of formats suitable for diverse communities. Communication about the cost will be available in all formats and languages. We have a high number of Somali families who live in this ward. |
| Religion or Belief | Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |

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| Potential impacts: | Lawrence Hill Ward had a high representation of residents from Muslim and Sikh faith groups |
| Mitigations: | As above - have a robust communications plan to ensure we provide clear inclusive and accessible information in a range of formats suitable for a diverse community. |
| Marriage & civil partnership | Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> |
| Potential impacts: | |
| Mitigations: | |
| OTHER RELEVANT CHARACTERISTICS | |
| Socio-Economic (deprivation) | Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Potential impacts: | Increasing costs of permits will have a bigger impact on low- or fixed-income households. |
| Mitigations: | It is proposed that the structure of ES RPS is changed to match other schemes but that the permit prices are increased in two cycles. We have estimated what the prices will be following another round of inflationary increases in 2025 and have recommended the prices are increased halfway at this time, and then to the full rate in 2025. |
| Carers | Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Potential impacts: | People who are dependent on motor vehicles to provide care for others may be disproportionately impacted by additional costs |
| Mitigations: | As above |
| Other groups [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

Increasing the maximum stay time for Pay & Display Parking has the potential to improve outcomes for those with some protected characteristics as it will allow them more time for their visits.

The discounted rate for business and customer permits will be available to any school, a charity, place of worship or businesses in receipt of full small business rate relief.

The proposed changes aim to ensure that residents are treated fairly and consistently across the city and are not advantaged or disadvantaged on the basis of their protected characteristics. Residents or businesses within Redcliffe RPS or Southville RPS, for example, show similar levels of deprivation to the part of Lawrence Hill that falls with the ES RPS and would have a clear expectation that they would not be treated less favourably than residents or businesses in other parts of the city.

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:

This assessment has shown that the proposal will most affect those in low of fixed income households but that car ownership is lowest in ES RPS so the impact is not as high as it would have been had the situation arisen in a different part of the city.

Despite this, it is not appropriate for those in ES RPS to be treated to different rules to residents or businesses in other scheme areas and that is why this change is being recommended.

We do however recognise that the financial impact on those who are affected is not insignificant and are therefore proposing to implement the increase over 2 tariff change cycles, so the full impact will not be felt until 2025.

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

It is important for the council to acknowledge that the current situation is treating some residents and businesses differently to others.

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 |
|---|---------------------|-------------|
| Recommend Cabinet approve an inflationary increase to RPS charges including the standardisation of ES RPS, with the prices increase in ES RPS to be staggered over 2 inflationary cycles and to be completed in 2025. | David Bunting | 2021 – 2025 |


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.

All scheme areas will be operating on the same basis.

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 Director¹.

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| Equality and Inclusion Team Review: <i>Reviewed by the Equality and Inclusion Team</i> | Director Sign-Off:  |
| Date: 29/12/2021 | Acting Director Management of Place Date: 06/01/2022 |

¹ 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.