

Record of Equality and Rights Impact Assessment

Part 1: Background and Information

(a) Background Details - Please list ERIA background details:

| | | | |
|------------------------------------|---|--------------------------------------|----------------------------|
| ERIA Title and Summary Description | 'Objections to Traffic Regulation Order TRO/13/45 - Greenways Parking Places Charges' (Report to Transport & Environment Committee on 21 March 2017) | | |
| Service Area | Division | Head of Service | Service Area Reference No. |
| Place | Planning and Transport | Paul Lawrence, Executive Director | 2017P76 |

(b) What is being impact assessed? Describe the different policies or services (i.e. decisions, projects, programmes, policies, services, reviews, plans, functions or practices that relate to the Corporate ERIA Title):

| Policies and Services | Date ERIA commenced |
|--|---------------------|
| 1. Parking charges in Greenways parking places | 25/07/2016 |
| 2. | |
| 3. | |
| 4. | |
| 5. | |

(c) ERIA Team - Please list all ERIA Team Members:

| Name | Organisation / Service Area |
|-------------------|-----------------------------|
| 1. Gavin Sherriff | CEC/Transport |
| 2. | |
| 3. | |
| 4. | |

Part 2: Evidence and Impact Assessment

(a) Evidence Base – Please record the evidence used to support the ERIA. Any identified evidence gaps can be recorded at part 3(i). Please allocate an abbreviation for each piece of evidence.

| Evidence | Abbreviation |
|-------------------------------------|--------------|
| 1. Officer knowledge and experience | OKE |
| 2. | |
| 3. | |
| 4. | |
| 5. | |

(b) Rights Impact Assessment – Summary - Please describe all the identified enhancements and infringements of rights against the following ten areas of rights. Please also consider issues of poverty and health inequality within each area of rights:

| Life | Health | Physical Security | Legal Security | Education and Learning | Standard of Living | Productive and Valued Activities | Individual, Family and Social Life | Identity, Expression and Respect | Participation, Influence and Voice |
|------|--------|-------------------|----------------|------------------------|--------------------|----------------------------------|------------------------------------|----------------------------------|------------------------------------|
| | | | | | | | | | |

Please indicate alongside each identified enhancement or infringement the relevant policy or service (see Section 1b) and relevant evidence (see Section 2a).

Summary of Enhancements of Rights

The proposed amendments to parking charges on Greenways aim to improve the availability of parking places during the day and ensure that places are being used for short-term parking only. This will improve the accessibility of parking and address concerns regarding commuter parking. This may improve the **standard of living** for people with disabilities as controlling parking better may allow them to park closer to their intended destination.

Introducing parking charges in places which are currently free of charge will improve rights to **health**. This will encourage people who drive to use alternative forms of transport rather than their private vehicle and will help tackle pollution, cut carbon emissions and improve air quality for everyone.

As a result of this report there are no known enhancements of rights relating to;

- rights to life
- rights to physical security
- rights to legal security
- rights to education and learning
- rights to productive and valued activities
- rights to individual, family and social life
- rights to identity, expression and self-respect
- rights to participation, influence and voice.

Summary of Infringement of Rights. Can these infringements be justified? Are they proportional?

The proposed changes to pilot a cashless only service on main Greenways routes may infringe on the rights of individuals who are not able to read. However, they will already have passed mandatory tests to receive their license, completed the process of obtaining a vehicle, insuring it and taxing it.

In addition, people who do not have mobile phones or bank accounts may be somewhat inconvenienced if they are unable to pay to park using coins. However, promotional materials will help raise awareness of and encourage people to use cashless payment alternatives.

Introducing charges with coin only payments could be just as inconvenient as cashless only payments to people who do not carry change, however, this is not considered to be an equalities issue.

(c) Equality Impact Assessment – Summary - Please consider all the protected characteristics when answering questions 1, 2 and 3 below. Please also consider the issues of poverty and health inequality within each protected characteristic:

| | | | | | | | | |
|-----|------------|-----------------|------------------------------|---------------------|------|------------------|-----|--------------------|
| Age | Disability | Gender Identity | Marriage / Civil partnership | Pregnancy Maternity | Race | Religion/ Belief | Sex | Sexual Orientation |
|-----|------------|-----------------|------------------------------|---------------------|------|------------------|-----|--------------------|

1. Please describe all the positive and negative impacts on the duty to eliminate unlawful discrimination, harassment or victimisation. Please indicate alongside each identified impact the relevant policy or service (see Section 1b) and relevant evidence (see Section 2a).

Positive Impacts

The introduction of parking charges is expected to be able to tackle all-day commuter parking better and improve the availability of parking spaces. This will increase the accessibility of parking places and this may improve access for disabled persons' blue badge holders.

Negative Impacts

The proposals to introduce parking charges on Greenways parking places are not expected to negatively discriminate, harass or victimize anyone with a protected characteristic.

2. Please describe all the positive and negative impacts on the duty to advance equality of opportunity (i.e. by removing or minimising disadvantage, meeting the needs of particular groups that are different from the needs of others and encouraging participation in public life)? Please indicate alongside each identified impact the relevant policy or service (see Section 1 b) and relevant evidence (see Section 2 a).

Positive Impacts

If the proposal goes ahead this will help ensure that parking opportunities continue to be available for shoppers, business users and their customers near to their intended destinations. This will enhance the equality of opportunity for people with **disabilities** as they may not have been able to park in these locations previously, due to the high demand for free

parking, and been unable to walk greater distances to their destinations from other areas.

Negative Impacts

The proposals recommend introducing a pilot of cashless only parking charges on Greenways. This may have a negative impact on some people with **disabilities**. While disabled persons' blue badge holders will continue to be able to park free of charge in these parking places, consideration is given to whether people with disabilities who do not hold a blue badge will be disadvantaged. Reading information notices and paying for parking using a mobile device may cause problems for some people with learning difficulties (such as dyscalculia) or those with physical impairments. However, there are likely to be some people for whom the existing ticket machines are currently inaccessible to pay for their parking and raising awareness of cashless alternatives may be beneficial.

Another concern could regard **race** as people from some backgrounds may not be able to speak English or it may be used sparingly as a second language. Census 2011 data suggests that 8,600 people (1.9% of Edinburgh's population) do not speak English well or at all. Conveying the need to pay for parking by phone to such people could be difficult. However, RingGo offers information in alternative languages on its app and this could be argued to be more accessible for visitors or non-English speakers than currently paying by coin.

Another socio-economic factor which may impact on older people concerns those who do not have access to a mobile device or those who do not have a bank account. This group of people is most likely not to own a mobile phone. However, cashless parking services are well established throughout the UK, mobile phone ownership in Scotland is 86% and public pay phones are still available in many areas. The UK government has also helped launch fee-free bank accounts for people on low-incomes to tackle such problems. Furthermore, most wages and benefits are now paid directly into recipients' accounts which makes living without one and running a vehicle most unlikely.

3. Please describe all the positive and negative impacts on the duty to foster good relations (i.e. by tackling prejudice and promoting understanding)? Please indicate alongside each identified impact the relevant policy or service (see Section 1 b) and relevant evidence (see Section 2 a).

Positive Impacts

The proposed recommendation to introduce parking charges on Greenways as set out in the report is not expected to impact upon the duty to foster good relations.

Negative Impacts

The proposed recommendation to introduce parking charges on Greenways as set out in the report is not expected to impact upon the duty to foster good relations.

Part 3: Evidence Gaps, Recommendations, Justifications and Sign Off

(i) Evidence Gaps - Please list all relevant evidence gaps and action to address identified gaps.

| Evidence Gaps | Action to address gaps |
|--------------------------------------|--------------------------------|
| 1. There are no known evidence gaps. | There are no proposed actions. |
| 2. | |
| 3. | |
| 4. | |
| 5. | |

(ii) Recommendations - Please record SMART recommendations to (i) eliminate unlawful practice or infringements of absolute rights, (ii) justify identified infringements of rights or (iii) mitigate identified negative equality impacts.

| Recommendation | Responsibility of (name required) | Timescale |
|--|-----------------------------------|---------------------------------|
| 1. Should cashless only parking charges be introduced it should be made clear that disabled persons' blue badge holders can continue to park free of charge. | Gavin Sherriff | At implementation |
| 2. The RingGo app should be accessible for all. | Gavin Sherriff | Discuss this issue with RingGo. |
| 3. Ensure RingGo allows sufficient time for people to complete enter their details – as some people with disabilities will take longer. | Gavin Sherriff | Discuss this issue with RingGo. |
| 4. | | |
| 5. | | |

(iii) Sign Off - I, the undersigned, am content that: (i) the ERIA record represents a thorough and proportionate ERIA analysis based on a sound evidence base, (ii) the ERIA analysis gives no indication of unlawful practice or violation of absolute rights, (iii) the ERIA recommendations are proportionate and will be delivered, (iv) the results of the ERIA process have informed officer or member decision making, (v) that the record of ERIA has been published on the Council's website / intranet or (vi) that the ERIA record has been reviewed and re-published.

| Date | Sign Off (print name and position) | Reason for Sign Off (please indicate which reason/s from list (i) to (vi) above) |
|----------|---|---|
| 7/9/2016 | Gavin Sherriff, Transport Officer – Parking Development | I and ii |
| 29/3/17 | Paul Lawrence – Executive Director of Place (gillian.johnston@edinburgh.gov.uk) | I-iii |
| | | |