Retrospective: analysing existing services and policies

Enfield Council

Retrospective Equality Impact Assessment (EQIA) - Equality Analysis

PLANNING, HIGHWAYS & TRANSPORTATION

SEPTEMBER 2013
Retrospective equality impact assessment/equality analysis template

Please complete this cover sheet

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<th>Service / policy</th>
<th>Planning, Highways &amp; Transportation Division</th>
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<tbody>
<tr>
<td>Officer completing the analysis</td>
<td>Rebecca Aldred</td>
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<td>Phone Number</td>
<td>3675</td>
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<td>Team (if applicable)</td>
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<td>Department</td>
<td>Environment</td>
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<td>July 2013</td>
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## Section 1 – Aims and objectives

### Q1. Please provide a brief description of the service or policy covered by this assessment/analysis

Planning, Highways and Transportation (PH&T) is a newly formed division following a minor realignment of services across Environment Department. The division comprises 7 distinctly different service centres and this is a high level assessment made across the broad spectrum of the services described below:

**Architectural Services**

Architectural Services provides a multi-disciplinary in-house service responsible for maintaining the Council’s operational assets (e.g. Civic offices, libraries, residential homes, youth centres) – through both planned, and reactive maintenance, plus delivering capital projects, both major and minor (e.g. £3,500,000, or £5000 in construction value) for internal “client” departments, the main commissioning department being Schools and Children’s Services. Architectural Services is currently involved in the delivery of a £25m programme expanding 8 schools to provide additional school places.

Some work has been outsourced to external consultants through either framework agreements or an externally vetted list.

**Business & Technical Services**

Business & Technical Services provide core support to internal facing services to ensure that Corporate Buildings are safe for staff and visitors, to enable suitable repairs and maintenance programmes and ultimately that the Council meets corporate landlord responsibilities, including the management of asbestos.

The work of the Geographical Information System (GIS) team supports a wider ongoing programme of work which aims to coordinate and improve access to geographical information layers by internal staff and to services in the Environment Department by developing GIS, web-based information for residents and the wider public. The overall aims are:

- to improve the ability for self service through the ability to make online bookings and payments,
- to improve information on choices and opportunities about healthy lifestyles, facilities and activities, where they are located and how to access them
- provide information on how, when and why key services are delivered.
Development Management

Development Management contains Planning Decisions, Building Control and Licensing which operate within a national legislative framework which sets out the parameters for service delivery in each specific area.

The Planning Decisions Team processes planning applications submitted to the Council as local planning authority and seek to regulate the use of land and its development to achieve outcomes which meet local and national planning policy objectives while also delivering high quality sustainable development. Engagement with the local community is an important part of the assessment of planning applications informing the decisions made. In fulfilling this function, it provides advice and a planning service to residents of the Borough as well as developers wishing to develop sites and premises. Building Control ensures that building work is carried out to a high standard in the interest of the health, safety and welfare of the occupiers, users and the public at large.

Building Control is exercised under the Building Act and through the application of the Building Regulations, which have been approved by Parliament. The Building Regulations set out the minimum standards of design and construction which should apply to categories of building work and establish the procedures for ensuring that building work meets these standards. The main purpose of the Building Regulations is to secure the health and safety of people in and around buildings, promote conservation of energy, and provide access to buildings and facilities for people of all abilities. Building Regulations apply to many aspects of building work carried out to all types of properties, e.g., houses, shops, offices, factories, schools, hospitals, and warehouses. They apply to minor works such as replacing windows and doors, removing an internal load-bearing wall, installing an additional toilet or converting the roof space to a room, as well as erecting new buildings and extending property. They may also apply when a property changes its use, e.g., from a house into flats.

Licensing administers legislation which prohibits certain activities unless those activities are licensed (‘permitted’) by the Council, as licensing authority. This licensing regime serves to keep the authority informed of licensable activities within the borough and gives the Council the opportunity to ensure the proper control of those activities (where necessary) by refusing licences or by granting licences subject to particular terms, conditions and restrictions. This regime also serves to protect local communities by allowing the Council to prosecute offenders and undertake other enforcement action (against those who undertake licensable activities otherwise than in accordance with the necessary licence) where such enforcement action is in the public interest. The Licensing Team administers the licensing regime in respect of 26 separate pieces of licensing legislation. The activities that are licensed by the team include alcohol, music and dancing, gambling, street trading, animal boarding/pet shops, fireworks and scrap metal dealers.

Highway Services

Enfield’s highway network is a key and highly visible community asset, supporting the economy and contributing to the character and environment of the borough. The service primarily provides effective management and day-to-day maintenance of the highway (roads, pavements and verges) and associated assets such as bridges, culverts and other highway structures, street furniture, trees, verges, shrub beds, street lighting, etc. The service is also responsible for the implementation of more sustainable planned highway improvements, supporting many of Enfield’s aims and objectives by aiding regeneration, social inclusion, community safety, health and the environment.

In addition to our statutory function of managing the highway network, we also provide a consultancy service for engineering and environmental projects, the focus of which is influenced by the Council’s priorities within ‘Putting Enfield First’.

The key service areas covered by this assessment are defined by four groups namely:

- Network Management and Improvements
- Highway Maintenance
- Redevelopment and Environmental Works
- Structures & Watercourses Sections
### Parking Services
The service manages all of the Council-owned public car parks and manages the Council's contractor who delivers the parking enforcement contract. The Service provides parking and traffic enforcement in the London Borough of Enfield in accordance with the provisions of the Traffic Management Act 2004 and has been operating decriminalised parking since July 1994. The scope of the service is broad and includes:
- Cash collection
- CCTV operations using static and mobile devices
- Clamping and removals
- Debt recovery including bailiffs
- Mobile phone parking
- On and off street pay and display
- Parking contraventions
- Penalty Charge Notice processing
- Provision of parking hotline
- Vehicle and lorry park operations

### Technical & Business Services
Technical & Business Services (T&BS) is integral to the delivery of the aims and objectives of Planning, Highways & Transportation Division, those of Environment Department and the Council.

The service centre comprises 4 distinct teams and delivers a wide ranging and diverse set of support functions primarily to the Highway Services and Traffic & Transportation Service within PH&T and other divisions within the Environment Department. The teams work closely with many of the other departments across the Council such as Finance, Human Resources (HR), Procurement and the Customer Service Centre etc. in order to deliver the Council's "one team" value.

The scope of the service is broad and includes:
- Technical Services - Advertising/hoardings on the public highway; Highway Third Party Claims; Disabled bays; Footway crossovers; Traffic orders – temporary and permanent; Highway licensing – skips, scaffolding and hoarding
- Corporate, Divisional and Service Projects
- Financial management
- Frontline customer services including telephones, correspondence and reception
- Full and comprehensive business and administrative support
- Performance, Customer Excellence & Satisfaction and Equalities
- Procurement support – across Environment

### Traffic & Transportation (T&T)
Transport is a fundamental issue in everyone’s life and therefore the Council has to address how it affects not only those who live in the Borough but those who come here to work, be educated, shop and take leisure, as well as those who travel through. The way in which people travel also affects their own health and the health of others by impacting upon our environment. There is a need to plan all Enfield’s transport requirements through the Council’s policy of providing a high level of accessibility for both individuals and goods; insofar as this is consistent with the safety of the individual and the maintenance of a satisfactory environment.

The service delivers a range of services including:
- Parking, traffic and environmental schemes
- Road safety initiatives and development
- School Crossing Patrols
- Transportation planning and policy
- Travel awareness and projects including school travel plans
Q2. Please list the main stakeholders / beneficiaries in terms of the recipients of the service or the target group at whom the policy is aimed

- Members of the public through User Groups, Area Forum, Residents Associations, Business Associations, and as individuals and businesses
- Council Members through the Cabinet, Scrutiny Panels, Committees and Groups, as well as individuals
- Voluntary Groups
- All Utility Companies
- Conservation Groups
- Contractors
- Department for Transport (DfT)
- Developers and their agents, and solicitors
- Enfield Disability Action
- Emergency Services
- Enfield in Bloom
- Enfield's Schools and their pupils
- English Heritage
- Environment Agency
- Health Trusts, Hospitals and other similar organisations.
- Highways Agency,
- London Buses and their private operators,
- London Underground and Rail Companies
- Metropolitan Police: Traffic, etc
- Other Local Authorities
- Other Service Departments and Service Centres within the Council
- Other services within Environment
- Professional Bodies: Institute of Civil Engineers etc
- Relevant Trade Companies
- Shops/Town Centre Association
- Train Operating Companies,
- Transport for London (TfL)
- Council Housing (limited now primarily to structural repairs on behalf of Enfield Homes)
- Community House (maintenance, improvements) – various voluntary organisations serving a wide range of community groups
- Parks buildings
- Allotments
- Cemeteries

Q3. How does the service or policy contribute to eliminating discrimination, advancing equality of opportunity, and foster good relations between different groups in the community? If it does not, please identify actions you intend to undertake to remedy this in your action plan (see attached)

In terms of service delivery, many of the division's services alone may not deliver reduced inequalities and a direct improvement in social equity. However, the right traffic, highway, building schemes etc, implemented in the appropriate areas, can make a significant contribution to the promotion of equality of opportunity and good community relations. PH&T always considers the impacts of its service on all users where possible. As such, all of our services are provided to everyone that lives, works, studies and does business throughout the Borough, irrespective of their potential disadvantaged grouping. The planning application processes administered by Development Management, for example, are not subject to any discrimination as they are statutory processes undertaken within strict guidelines. This statement applies to all groups below.

PH&T fully complies with the Council’s policy for equality and diversity in employment. All recruitment processes are carried out in accordance with the policy. We actively promote
the Minority Ethnic Staff Group and currently have officers who attend.

D

Whether designing highway improvements, traffic schemes or carrying out maintenance on existing roads, we comply with nationally agreed Codes of Practice and Design Guides or legislation that set standards specifically to include access and facilities for people with disabilities. For example, all new pedestrian crossings include facilities for disabled people i.e. dropped kerbs and tactile paving. All works on site have alternative access for disabled customers i.e. temporary crossing points, ramps, tapping rails on barriers etc and we ensure that other companies, such as the utilities, working on the highway do the same.

When assessing planning applications, particular those for individual householders, the personal circumstances of the owner / applicant can be a material consideration. In particular, planning policy expressly states that the needs of an applicant with a disability can be justification for a relaxation of planning standards requiring a proactive approach to ensure the needs of the occupier can be met.

There are many concessions for Blue Badge holders to enable them access to parking places. There is disabled access to the Parking Shop at Crown Road and at the Civic Centre. Blue badge disabled bays are located in all Council car parks. Free residents permits are issued to Blue Badge Holders living in Controlled Parking Zones (CPZs). The introduction of a car washing service in Palace Gardens provides employment opportunities to adults with learning difficulties.

We actively contribute to the development of planning policy to ensure that new development is accessible by public transport, by foot and by cycle rather than just those with access to a car; ensuring that new development makes adequate provision for people with disabilities as well as parents/carers; ensuring that the needs of people with disabilities and parents/carers are considered in the design of traffic schemes. We also provide a shopmobility service for people with restricted mobility.

Disability Discrimination Act (DDA) surveys were taken of Council buildings several years ago. A programme of DDA adaptations was established and works prioritised to ensure issues raised were addressed. This may be through construction works (e.g. installation of ramp or stairlift or audio loop), management action, or a combination. A specific programme of access improvements to schools has now virtually ended but one-off adaptations may be made e.g. where a child with a disability starts at a school.

Property Services previously monitored compliance against a National Key Performance Indicators (KPI) for the percentage of accessible public buildings.

All staff are required to advise us of whether they consider themselves as having a disability at the time of applying for employment and all necessary measures are taken to support them within the workplace.

G

N/A in service delivery

PH&T fully complies with the Council’s policy for equality and diversity in employment. All recruitment processes are carried out in accordance with the policy. In some of our service centres and where possible, we have actively encouraged development of female staff within a predominantly male-dominated profession.

A

T&T are currently providing road safety education to those in deprived communities to address their disproportionately high casualty rates (particularly amongst children), as well as education and publicity specifically tailored to both young and older people.

The borough has a “Brown Badge” scheme which allows over 70s in the borough to park in specially marked bays in all car parks. They are issued to older residents who may not be entitled to a Blue Badge but may have mobility problems due to age.

PH&T fully complies with the Council’s policy for equality and diversity in employment. All recruitment processes are carried out in accordance with the policy.

F

T&T carry out an annual road closure for the Hindu Chariot Procession and other faith groups as requested in order to support various religious festivals. We respond to the
requests of the communities which allows all sections of the communities to participate in these events.

PH&T fully complies with the Council’s policy for equality and diversity in employment. All recruitment processes are carried out in accordance with the policy. We provide a quiet area for staff who wish to pray at specific times and provide a flexible approach to working during specific religious festivals such as fasting.

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<thead>
<tr>
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<th>N/A in service delivery</th>
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<tr>
<td>S</td>
<td>PH&amp;T fully complies with the Council’s policy for equality and diversity in employment. All recruitment processes are carried out in accordance with the policy.</td>
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<td>PH&amp;T fully complies with the Council’s policy for equality and diversity in employment. All recruitment processes are carried out in accordance with the policy.</td>
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<td>P</td>
<td>PH&amp;T fully complies with the Council’s policy for equality and diversity in employment. All recruitment processes are carried out in accordance with the policy. We apply the Council's flexible working arrangements and allow staff to work compressed working weeks or other flexible arrangements if compatible with service requirements in order to balance child care responsibilities with work responsibilities.</td>
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### Q4. If the service is provided by another organisation or agency on behalf of the Council, please give the names of these organisations / agencies

All "Client" functions are delivered in house by the various services but the delivery is as follows:

- Highways Works Contract - Mouchel Enterprise
- Grounds Maintenance Contract – Enterprise Ltd
- Tree Management Contract – Gritswood and Toms
- Street Lighting Private Finance Initiative (PFI) – Bouygues UK Ltd
- Parking Services enforcement contractor is NSL.
- The Cashless Parking provider is Adaptis.
- Cycle Confident – cycle training
- Kirkman & Jourdain Ltd – provider of mechanical and electrical services for corporate buildings
- Munns Ltd – provider of building services for corporate buildings
- EC Harris
- BHP Architects
- Pellings
- Ingleton Wood
- KUT Partnership
- Turner & Townsend
- Pick Everard
- Connisbee
- Seetec – an organisation that helps people with learning difficulties get work experience runs the car washing service in Palace gardens.

### Q5. If external providers are involved, what measures are in place to ensure that they comply with the Council’s Equal Opportunities and Valuing Diversity Policy? If there are none, please identify actions you intend to undertake to remedy this in your action plan
The delivery of equal opportunities is built in at every stage of procurement of contractors from tendering to award through to delivery. KPIs are in place and are monitored at quarterly contractor monitoring regularly along with site checklists to ensure compliance.

Procurement of construction or maintenance contractors is via the EXOR pre-qualified list for works below the European Union (EU) threshold, which has similar process to that used above. A recent procurement exercise for new maintenance contractors has followed a fully EU compliant process with pass/ fail against equalities compliance.

Q6. Does the policy / policies that influence the provision and delivery of your service need reviewing to take account of the duties under the legislation. If so, include this in the action plan

Where appropriate, all highway, traffic and environmental designs are undertaken in accordance with design standards and best practice guidelines which include equalities considerations. These are continuously being reviewed on a national and local scale and PH&T has a culture where staff are encouraged to keep up to date with current and emerging practices through active training and development opportunities. Key examples include the recent development of our Streetscape Guide, for which a Predictive Equality Impact Assessment/Analysis was undertaken.

The assessment of planning applications is informed by policies contained in local and national planning policy. Local planning policy contained in the Core Strategy and emerging Development Management Document is prepared by colleagues in the Planning Policy Team and subject to separate equality impact assessment/analyses.

The Local Implementation Plan, which is the Council’s adopted plan for implementing the Mayor of London’s Transport Strategy, was the subject to an extensive Equality Impact Assessment/Analysis.

Section 2 – Consultation and communication

Q7. Please list any recent consultation activity with disadvantaged groups carried out in relation to this service or policy

R Whether we are consulting service users, potential users, ordinary citizens, or other organisations, we need to ensure that the voices of all local people are considered. Consultation should be accessible to all sections of the community and this will often mean making a special effort to target particular groups or sections of the population. The degree of public engagement will vary according to the purpose and nature of the consultation activity and the service carrying out that consultation. Whatever method of consultation is used, we take reasonable and positive steps to encourage participation from those that have traditionally been excluded or not involved in consultation.

For bespoke schemes where residents’ views are required, we have developed a specific approach to consulting with the community whereby we have set up ‘drop-in’ cabins on site where staff are available to discuss scheme proposals with members of the community, and where residents are actively encouraged to contribute to the development of the scheme. As part of the consultation planning process, we always endeavour to choose the right venue and times, publicise the consultation in the right place and remove language barriers.

Access to planning application processes is fully available on-line through Enfield Council’s website and through links to the Governments Planning Portal. Guidance information, on-line payments and the planning on-line register enable customers to view, apply and comment on planning applications. Web information is written in plain English.

Lytchett Way Neighbourhood Regeneration Project

A consultation was carried out prior to the environmental improvement scheme using a traditional method of letter drop. There were only 8 replies! Highway Services decided to review the method of consultation to make it more inclusive and
successful. They studied the demographics of the area and discovered a high Somali and Turkish population. They wrote an invite to a planned consultation event in the relevant languages. The event was held on several days, avoiding religious days with two interpreters. This approach resulted in over 800 responses.

Highway Services and Traffic & Transportation recently gave a presentation on its service delivery to the Enfield Racial Equality Council. The presentation was well received and no specific equalities issues were raised.

Because of our diverse staff make up, we are able to use our own staff to offer a local translating service, such as Turkish, when necessary as well as accessing the Council’s Translation and Interpreting Services (T&I) services.

Planning information is also available from the ground floor at the Civic Centre. Some larger scheme applications are available to view in paper copy at local libraries, particularly those where the wider community have been actively involved.

Enfield Disability Action is consulted on major development schemes (40 consultations 2012/13); and other specific disability groups depending on the nature of the proposed development. For instance, Royal National Institute for the Blind and the local Blind Groups were consulted on the application for Go Ape at Trent Park because of the effect on a blind trail.

T&T carry out regular consultation via the Enfield Transport Users Group, which includes representatives from the Enfield Over 50s Forum etc. We have also established a Shopmobility User Groups and Working Group, which includes representatives from Enfield Disability Action (EDA), the Over 50s Forum and Age UK Enfield.

Enfield Council’s Streetscape Guidance
The following groups were consulted on volume 1: -

Enfield Vision
Enfield Disability Action
Enfield Association for the Blind
Enfield wheelchair Users forum
Enfield Visually Impaired User group
Age UK Enfield
Enfield Over 50’s Forum

All received a copy of the draft document, and in the case of Enfield Vision, a presentation was given.

For volume 2, the following groups were consulted with: -

Enfield Vision
Enfield Disability Action
Age UK Enfield
Enfield Over 50’s Forum

The disability groups not included had not responded to the first consultation. However, they operate under the umbrella of Enfield Disability Action.

On the Enfield Town improvement scheme, we invited people who are partially sighted to comment on aspects of the design

T&T recently carried out a group specific consultation on the proposed changes to the Disabled Parking Bay policy

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<td></td>
<td>At Turkey Street Open Space, staff engaged with local residents in order to capture their impressions and memories of the local area, which have then been etched into wood as part of a landscaping improvement scheme</td>
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<tr>
<td></td>
<td>We avoid holding consultation events on religious holidays</td>
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**Q8. Please state what action you have taken as a result of these consultation exercises**

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<th>Lychet Way Neighbourhood Regeneration Project</th>
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<td></td>
<td>Design proposals have been developed and amended based on contributions from local people, as a result of appropriate communication and consultation. In turn this has resulted in a reduction in crime.</td>
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<tr>
<th>D</th>
<th>Continuation of the Shopmobility User Group to help establish better links with EDA, Over 50s Forum &amp; Age UK Enfield</th>
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<td>Rights of Way Improvement Plan (RoWIP) amended to include proposals to make network more accessible.</td>
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<td>A Design Review Panel is being established which will seek to ensure development proposals are of the highest design standard and meet the needs of all groups within society including necessary accessibility standards for those with a disability</td>
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<td>Feedback mainly came from the presentation to Enfield Vision and was related to colour contrast, particularly around street furniture and tactile paving. These views reflected national concerns, which conflicted with developing streetscape views (local and national). In the end, a balance was struck in the development of the L.B Enfield Streetscape Guidance</td>
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| G | N/A |

|   | A | As D above |

| F | N/A |

| S | N/A |

| T | N/A |

| M | N/A |

| P | N/A |

**Q9. Please state how you have publicised the results of these consultation exercises**

| R | Where appropriate, the results of consultation exercises are posted in the on-site drop-in cabins, or are incorporated into scheme designs. More formal consultations for traffic schemes are fed back to residents by post on a scheme by scheme basis. This is not specific to any disadvantaged group |

| D | The outcome of consultation with Shopmobility users were reported to Cabinet and have been discussed at both the Working Group and User Group Meetings |

| G | N/A |

|   | A | As D Above |
Q10. Please identify areas where more information may be needed. Identify the action needed to obtain this data in the action plan.

| R | None identified |
| D | None identified |
| G | None identified |
| A | None identified |
| F | None identified |
| S | None identified |
| T | None identified |
| M | None identified |
| P | None identified |

Q11. Please state how you consult with members of your staff about your service or policy. If you do not, please identify what action you intend to take to remedy this, and include it in your action plan.

PH&T is committed to involving staff in reviewing service delivery and setting objectives and targets.

We adopt a top-down bottom-up holistic view and the “golden thread” is apparent throughout the Council’s Improvement Plan, Departmental Plan, Service Centre Plan, other relevant plans and strategies and staff individual objectives. This means that our overall vision and objectives are apparent and reflected in the delivery strategies that are linked to it.

Recent high level objectives were circulated to all staff within each service having been developed and discussed at department and divisional level. Staff were invited to feed back any comments, omissions, clarifications etc.

Staff are consulted via Group Meetings, Team meetings, One-to-Ones between Managers and officers, Staff Appraisals, workgroups, specific project meetings, service briefings, Team Brief, Staff Matters etc.

Many staff are also residents of the borough. There is also an opportunity to use staff group meetings as an additional way of finding out views on service delivery issues as well as employment ones. We will present to the Minority Ethnic Staff Group and the Staff with Disabilities Action Group if it is relevant and proportionate, especially where we have difficulty in getting views from other means of consultations.

| R | As above |
| D | As above |
Section 3 – Data and research

Q12. Please describe how you carry out equalities monitoring of the take-up and use of your service. – If you do not carry out equalities monitoring, please explain why.

R

There are limited opportunities when delivering our type of services to carry out monitoring, however, we include equalities monitoring forms in:

- Footway Crossing Application packs
- White line entrance markings
- Corporate Complaints responses
- Disabled Parking Bays
- Cycle training
- Consultation on traffic and parking schemes
- Shopmobility
- and postal consultations

Overall, we receive very few returns. The monitoring forms include Race, Disability, Gender and Age but we feel Faith, Sexual Orientation, Transgender, Marriage and Pregnancy is not relevant to the service other than in consultation. Results of the monitoring forms are available if required.

We carry out onsite checks to ensure works are compliant with regard to access for people with disabilities.

D

As above

G

As above

A

As above

F

N/A

S

N/A

T

N/A

M

N/A

P

N/A

Q13. How are the results of any equalities monitoring analysed?

R

Due to the limited returns, the data is often not sufficient to carry out meaningful analysis. However, the information is reviewed to ensure that specific groups are not being disadvantaged.

D

As above
Q14. Does an analysis of your customers against baseline population figures show that you are reaching all disadvantaged groups? If not, state the action you plan to take to address this in your action plan

R  Due to the limited returns, the data is not sufficient to carry out meaningful analysis.

D  There is some concern that the current composition of shopmobility customers does not reflect the ethnicity of the Borough as a whole.

G  As R above

A  The Council has issued 1780 Brown Badges equating to approximately 6% of the over 70s population. We are unsure of the % per household – there could be more than one badge per household.

Q15. Please describe how you carry out equalities monitoring of the satisfaction of customers using your service – if you do not carry out equalities monitoring, please explain why

R  Highway services carry out post scheme satisfaction surveys which include Race, Gender, Age and Disability – the other groups are not relevant to the services we deliver.

Highway Services, Parking Services and T&T included questions on the Council’s Residents Satisfaction Survey which includes equalities monitoring:
Road and Pavement Maintenance
Trees, Verges and Shrub beds
Street Lighting
Car Parks

D  As above

G  As above

A  As above

F  N/A

S  N/A

T  N/A
**Q16. What does this customer satisfaction data tell you?**

**R**  
The findings from the surveys re car parks indicate that BME and white residents have similar levels of satisfaction/dissatisfaction.

**D**  
In relation to satisfaction with pavement maintenance, satisfaction among disabled people had been consistently lower pre-2012. However, satisfaction levels among disabled people are increasing and according to the latest annual residents' survey they are similar to those who do not have a disability. The difference in satisfaction levels are now similar to the margin of error.

**G**  
Any other differences with any other services and/or comparable demographic groups, are statistically insignificant.

**A**  
That Parking Services should look at options for older motorists and if changes need to be made, that further discussion could take place with stakeholder groups, for example the Enfield Over Fifties Forum. This specifically refers to using the car parks e.g. access, payment methods, cleanliness etc.

**Q17. Please list any performance targets relating to equality that your service or policy includes**

**R**  
When arranging consultations, to consider appropriate location, language, times, dates etc. (utilising the Council's engagement checklist) – applies to all disadvantaged groups.

**D**  
- 100% of all works on site to provide alternative access for disabled people i.e. temporary ramps
- 100% of all works on site provide safety precautions for disabled people i.e. tapping rails for blind.
- All highway improvement schemes to include dropped kerbs for improved access to highway, including tactile paving.
- Monitoring of the delivery of the Mayor's priorities through the Local Implementation Plan, particularly Target 10 (Access; TfL and boroughs are to achieve year on year improvements in the proportion of trips made by equality and inclusion target groups under-represented in the public transport travel market, particularly disabled people, older people and women travelling at night
- Many of the targets that relate to disability also apply to gender and older people, for example ramps that are utilised by people in wheelchairs also assist people with pushchairs

**G**  
As R above

**A**  
As R above

**F**  
As R above

**S**  
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**T**  
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**Q18. Please list any plans you have to introduce new targets for equality in your service or policy – this could be as a result of identifying best practice in other authorities. Include this in the action plan**

**R**

Findings from future Predictive Equality Impact Assessments/Analyses on new policies will be taken into consideration. Because of the regulatory nature of the services within Development Management, there are no plans to introduce targets. It should also be noted that the policies implemented by the Services are produced by other departments within the Councils who would be assessing their impact on the identified communities.

**D**

Reinstate BVPI 165 - percentage of pedestrian crossings with facilities for disabled i.e. tactile paving.

**G**

As above

**A**

As above

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As above

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As above

**Q19. Have you received any complaints about your service or policy in respect of equality issues? If so, please give a brief description**

**R**

We received a corporate complaint from a resident alleging racial abuse towards them by one of our officers. This was thoroughly investigated and the complaint was not upheld.

Complaints of a racial nature have been received about NSL enforcement staff. All complaints exonerated.

**D**

Customers often dissatisfied if applications for on-street disabled bays are not permitted based on the application of current criteria. A review of the criteria and procedure for assessing applications has been commissioned.

**Compliment**

Dear Sir/Madam,

I just wanted to thank you for the brilliant cycle path to Forty Hall. Having to use a mobility scooter - so many places are inaccessible to me, so I'm really looking forward to the completion of the other paths. Keep up the good work - and thank you once again.

Regards,

**G**

No

**A**

An elderly member of the public used the pay and display machine and a coin he used did not register. As he was hard of hearing he did not hear the coin being rejected, did not pay enough and later was issued with a Penalty Charge Notice. The machines do show the money registering and therefore we enforced the Penalty Charge Notice as the correct tariff had not been paid for. The motorist complained.
that he could not be held responsible for the coins not registering. The complaint was not upheld.

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**Section 4 – Assessment of impact**

**Q20. Please list any evidence / results of research you have of the service or policy having an adverse impact on different disadvantaged groups.** If there is any adverse impact, please identify actions you intend to undertake to remedy this in your action plan.

**R** Although no proactive research has been carried out, there is no evidence to suggest that our service delivery as a whole has any adverse impact on any of the different disadvantage groups.

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**A** The decision to remove funding from the shopmobility service could make it more difficult for some people with restricted mobility to access the shops and services in Enfield Town and Edmonton Green – see separate Predictive Equality Impact Assessment/Analysis previously carried out.

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**Q21. What are the potential or known barriers to participation for the different disadvantaged groups?** Please identify actions you intend to undertake to remedy this in the action plan.

**R** PH&T is working towards breaking down barriers re. the different disadvantaged groups (e.g. disabled access, inclusive consultation strategies etc.) but we recognise that there is always more that can be done. We can make assumptions that language is a barrier but have had very few requests for documents in other languages.

Understanding the regulatory framework and in particular, the need to obtain formal consent / permission before commencing certain works / operations. Cultural differences and needs may also occasionally conflict with policy. Language and access to information including online information.

Some of the main barriers include:

- Language, although consultation documents etc. are written in Plain English and a translation service is offered.
- The transient nature of the population in some parts of the borough makes it difficult to engage with certain elements of the community by traditional means.

A different approach to community engagement is being taken with the Lytchet Way Scheme Home Zone, where a community-led approach is being taken.

<table>
<thead>
<tr>
<th>D</th>
<th>Difficult access to / use of buildings or parts of buildings (either new or existing). Actions being taken: New buildings designed to be compliant with Building Regulations / good practice / design guides (staircase design, lift provision, including designated evacuation lifts where necessary, signage, position of light switches / sockets, visible fire alarms, audio loops, power assisted doors etc.)</th>
</tr>
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<tbody>
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<tr>
<td>A</td>
<td>Access issues above may also apply to the elderly. Design of new elderly persons homes takes into account best practice design, e.g. safe circulation /wandering routes in gardens for people with dementia.</td>
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**Q22. Could the service or policy discriminate, directly or indirectly, according to the accompanying definitions?** Please refer to the guidance notes under the 8. *Useful Definitions*

PH&T, in its service delivery, does not discriminate, directly or indirectly. Where a specific need has been identified, positive action is being taken, such as the provision of dropped kerbs and tactile paving or promoting engineering amongst women.

The Service discharges the Council’s statutory responsibilities through the enforcement of a wide range of Acts and Regulations, set out by Central Government. As such, all of our services are provided to everyone that lives, works, studies and does business throughout the Borough, irrespective of their group.

Development Management operates within a statutory framework irrespective of equality classification. Each application is received and validated using the list of planning application requirements. Consultation is governed by statute and local policy. The policy against which the planning application is assessed is produced and reviewed by colleague in Planning Policy and subject to a separate equality impact assessment/analysis as part of the policy adoption process. Direct discrimination might be where an adaptation for an individual person is refused, however, this would be a client department decision, not a decision made by Architectural Services. Indirect discrimination might occur where a design or building works failed to cater for a specific disability.

**Q23. If so, is it justifiable under the legislation?** Please refer to the guidance notes under the 8.*Useful Definitions*

DDA legislation requires “reasonable adjustment” to facilitate access to services / buildings etc. – there may be a situation where provision of e.g. a lift to a listed historic building was not physically possible, but where access could be provided by appropriate management action. Responsibility for determining the approach would be for the client department / premises manager, not for Architectural Services.
Q24. Could the service or policy have an adverse impact on relations between different groups/community cohesion? If so, please describe below. Identify actions you intend to undertake to remedy this in your action plan

We have not identified any adverse impact on relations between different groups. It is felt, due to the type of service that we are responsible for, it is unlikely to do so.

The effects of any decision, particularly through the planning process, has the potential to impact upon the amenities of a particular community. This effect though would be assessed as part of that process in accordance with legislative provisions and local adopted planning policy.

Section 5 – Tackling socio-economic inequality

Q25. Does your service in any way specifically assist communities disadvantaged through the following socio-economic factors? Please explain below. If it does not, please state how you intend to remedy this (if applicable to your service), and include it in the action plan

Communities living in deprived wards/areas

For bespoke schemes where residents’ views are required, we have developed a specific approach to consulting with the community whereby we have set up ‘drop-in’ cabins on site where staff are available to discuss scheme proposals with members of the community, and where residents are actively encouraged to contribute to the development of the scheme. Examples have included the development of proposals at Lychet Way Housing Estate, where residents have contributed to the development of recreational spaces and play areas. This is a deprived area and which provides homes to disadvantaged and minority groups.

At South Street, local meetings were held with residents and local groups to develop the proposals and explain proposed traffic management arrangements. A local hopper bus was arranged as part of the scheme to provide a link along South Street due to the main bus service being diverted around the traffic management area.

Through its decision making function, the Planning Decisions Team is involved in the determination of planning applications the more significant of which have the potential to positively impact upon communities living in deprived areas by approving development for new employment or by raising the quality of the environment thereby making it more attractive to new investment.

The Planning Decisions Team is required to be positive and proactive in its dealing with developers and granting planning permission, and is able to secure benefits either through legal agreement or conditions.

During the Jubilee celebrations of 2012, all temporary road closure fees were waived in order to encourage community participation.

People not in employment, education or training

The division is actively engaged in the Council’s Apprenticeship Scheme and currently has several apprentices in place. The division utilises the Council’s Community Benefits Toolkit when carrying out procurement exercises. This toolkit encourages all tender exercises to include matters such as employment, environmental and economic sustainability and equalities.

Major contracts issued all have local employment / apprenticeships as key requirements of the tender and award process. Contract management meetings monitor the compliance with this part of the contract.

The Planning Decisions Team is required to be positive and proactive in its dealing with developers and by granting planning permission, is able to secure benefits either through legal agreement or conditions that provide construction training associated with the implementation of the approved development.

Current support for service departments includes supporting the Regeneration Team with
projects such as Jobsnet, and provision of additional school places for Schools and Children's Services.

### People with low academic qualifications

The Planning Decisions Team is required to be positive and proactive in its dealing with developers and by granting planning permission, is able to secure benefits either through legal agreement or conditions that provide construction training associated with the implementation of the approved development. The implementation of successful development also increases job opportunities.

Current support for service departments includes supporting the Health, Housing and Adult Social Care Department with improvements to Day Centres such as the Formont Centre and Park Avenue Day Centre.

### People living in social housing

Lytchet Way Housing Estate, Enfield Highway, is an improvement scheme, where Highway Services developed and implemented a scheme on behalf of, and in partnership with, Enfield Homes.

We are unable to do anything for existing residents other than by ensuring any new development in the vicinity is of the highest environmental quality which responds to the needs of the local community and grounds within this. People living in social housing however, would have no specific attributes associated with that particular definition needing to be addressed through the planning process.

The Planning Decisions Team is required to be positive and proactive in its dealing with developers and by granting planning permission, is able to secure benefits either through legal agreement or conditions. This includes the delivery of affordable housing which is affordable to residents of the Borough and a mix of housing which reflects the needs of residents of the Borough.

Current support for service departments includes supporting the Housing Strategy with the regeneration of housing estates such as Highmead or Alma and supporting Enfield Homes with structural repairs to the Council’s housing stock.

### Lone parents

The division is supportive of new ways of working and more flexible working practices which could assist lone parents to re-enter the employment market. Current support for service departments includes supporting the Schools and Children’s Services Department with improvements to / maintenance of Family Centres.

### People on low incomes

The Planning Decisions Team has a particular involvement in securing affordable housing including the attainment of affordable rents for local residents

Fees for all elements of development management are set nationally at present so there is no scope to amend to address particular issues of low income. New development is required to be energy efficient and maximise sustainable design and construction. All development needs to meet Code for Sustainable Homes Standards, thereby reducing the costs of energy for residents.

### People in poor health

See previous answers that are relative to people with disabilities.

Planning policy also seeks to address issues of improving health facilities as well as the access to sports and open space.

Both Planning Decisions and Licensing apply policies in regard to the location of hot food takeaways, which responds to the prevalence of such outlets and increasing obesity in certain population groups.

T&T are working with the Council’s Public Health Team to deliver a wide range of initiatives to
promote active travel, particularly relating to walking and cycling.

The planning process is also able to ensure new development makes an appropriate contribution to the provision of necessary health infrastructure. New development also has to comply with Life Time Homes standards to ensure is it adaptable to the changing needs of residents

Any other socio-economic factor

The planning process in addition to ensuring new development makes an appropriate contribution through the adopted s106 Supplementary Planning Document, seeks to ensure development improves the Borough’s environment

Section 6 - Miscellaneous

Q26. How does your service plan address equalities issues? Please explain below. If it does not, please state how you intend to remedy this, and include it in the action plan

The divisional business plan is reviewed and updated annually in accordance to the corporate guidelines. This includes a specific section on Equalities. Actions identified on completion of this assessment/analysis will be added to the business plan objectives.

Individual Hay graded Officers have a specific equalities objective in their appraisals and we have are active members of the Environment Equalities Group, represented by a Head of Service

Q27. Please list any staff training issues on equality arising from this assessment/analysis. Include this in your action plan

Equality and Diversity is a measured competency in the staff appraisal process. Any training needs are identified as part of this process and added to the service Training and Development Plan.

Equality and diversity has been identified as a training theme at Department Management Team level and the division will support and promote this training to all staff within the service.

Q28. How do you plan to publicise the results of this assessment/analysis? Include this in your action plan

This assessment/analysis will be published on the Council’s website.

A copy will be provided to all Heads of Services to discuss with staff and they will feedback any comments and future suggestions

The need for predictive EQIAs has already been discussed at PH&T DMT and other management meetings. This document will also be discussed.

Q29. Does your service or policy result in any financial support being given to disadvantaged groups within the voluntary and community sector. If ‘yes’, please list organisations and amounts

No.

However, the application fee for a Footway Crossing Application is waived for people with a disability.

Q30. When and how do you intend to review this assessment/analysis? Include this in your action plan

Predictive Equality Impact Assessments will be carried out, when relevant, on new policies and services.

This retrospective assessment will next be reviewed as part of the Council’s three-year rolling
programme in 2016/17.
The Action Plan will be monitored in line with the business plan.
13. Action plan template for existing services or policies

Service or policy covered by this assessment/analysis: …Planning Highways and Transportation…………………………………………………

Department: Environment  Assistant Director: Bob Griffiths

NB This is a high level, divisional action plan. Individual service centres have more detailed action plans specific to their service where necessary.

<table>
<thead>
<tr>
<th>Issue</th>
<th>Action required</th>
<th>Lead officer</th>
<th>Timescale</th>
<th>Costs</th>
<th>Comments</th>
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</thead>
<tbody>
<tr>
<td>Predictive Equality Impact Assessments/Analyses</td>
<td>Undertake PEQIAs when developing new proposals or changes to an existing service or policy where necessary</td>
<td>Heads of Service</td>
<td>As appropriate</td>
<td>Existing resources</td>
<td>All managers to ensure that these are carried out</td>
</tr>
<tr>
<td>Engage with minority groups</td>
<td>Engage with minority groups e.g. Enfield Vision or Over 50s Forum if possible</td>
<td>Heads of Service</td>
<td>As appropriate/identified as part of the service planning process</td>
<td>Existing resources</td>
<td>Include in service planning process. Include Mini in T&amp;T Plan. Use the reporting process to ensure we address/consider equalities</td>
</tr>
<tr>
<td>Identify good practices</td>
<td>Identify good practice from other authorities/national/local groups.</td>
<td>Heads of Service</td>
<td></td>
<td>Existing resources</td>
<td>Where appropriate on projects and as part of the reporting process</td>
</tr>
<tr>
<td>Ensure staff are properly trained in equalities issues/awareness</td>
<td>Staff to attend proposed Environment Department equalities training sessions</td>
<td>Heads of Service with Rebecca Aldred</td>
<td>Within 13/14</td>
<td>Top slice budget</td>
<td>All staff booked to attend theatre style equalities and diversity training throughout October 2013</td>
</tr>
<tr>
<td>Review of Retrospective Equality Impact Assessment (REQIA)</td>
<td>Review REQIA</td>
<td>Bob Griffiths/Rebecca Aldred</td>
<td>By August 2016</td>
<td>Existing resources</td>
<td>It might be necessary to review earlier depending on divisional and Council structure changes</td>
</tr>
<tr>
<td>Consultations</td>
<td>Contribute and sign up to the Environment Consultation Strategy and train staff</td>
<td>Rebecca Aldred – Heads of Services</td>
<td>March 2014</td>
<td>Existing resources</td>
<td>In progress</td>
</tr>
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</table>
APPROVAL BY THE RELEVANT ASSISTANT DIRECTOR - NAME: Bob Griffiths

SIGNATURE: [Signature]

R. D. Griffith