

Greater Manchester's Clean Air Plan to Tackle Nitrogen Dioxide Exceedances at the Roadside

Equality Impact Assessment at Consultation



Salford City Council



Oldham Council

TRAFFORD COUNCIL



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Version Status:	Approved	Prepared by:	Prepared by: Transport for Greater Manchester on behalf of the 10 Local Authorities of Greater Manchester
Reviewed by: Date:	Megan Black July 2020		

COVID-19 Pandemic Statement

This work has not considered the impact of the COVID-19 pandemic. Whilst we are continuing, where possible, to develop the Greater Manchester Clean Air Plan, the pandemic has already had an impact on our ability to keep to the timescales previously indicated and there may be further impacts on timescales as the impact of the pandemic becomes clearer.

We are also mindful of the significant changes that could result from these exceptional times. We know that the transport sector has already been impacted by the pandemic, and government policies to stem its spread. The sector's ability to recover from revenue loss, whilst also being expected to respond to pre-pandemic clean air policy priorities by upgrading to a cleaner fleet, will clearly require further thought and consideration.

The groups most affected by our Clean Air Plan may require different levels of financial assistance than we had anticipated at the time of writing our previous submission to Government.

More broadly, we anticipate that there may be wider traffic and economic impacts that could significantly change the assumptions that sit behind our plans. We have begun to consider the impacts, and have committed to updating the government as the picture becomes clearer over time.

We remain committed to cleaning up Greater Manchester's air. However, given the extraordinary circumstances that will remain for some time, this piece of work remains unfinished until the impact of the COVID-19 pandemic has been fully considered by the Greater Manchester Authorities.

1 Introduction

- 1.1 This is the Equality Impact Assessment (EqIA) to support the consultation process for the GM Clean Air Plan (GM CAP).
- 1.2 The assessment considers the potential for the GM CAP to result in disproportionate or differential equality effects on people with protected characteristics. The assessment is made at the scale of Greater Manchester and builds on the EqIA that was published at the Outline Business Case stage in March 2019.

2 Scope of an Equality Impact Assessment

- 2.1 An EqIA is a recognised, specific process, used to inform the development of policies in order to facilitate maximum positive outcomes and to avoid or minimise adverse impacts on equality groups.
- 2.2 An EqIA considers the impact on nine protected characteristics:
 - 1. age;
 - 2. disability;
 - 3. gender reassignment;
 - 4. marriage and civil partnership;
 - 5. pregnancy and maternity;
 - 6. race;
 - 7. religion or belief;
 - 8. sex; and
 - 9. sexual orientation.
- 2.3 An EqIA does not directly consider the impact on those communities that are economically disadvantaged or that have high level of social deprivation, unless there is a clear correlation with a protected characteristic. A separate socio- economic assessment is being undertaken for the GM CAP that will consider these factors.

3 Requirement of public bodies

3.1 Under Section 149 of the Equality Act (2010), public bodies are subject to the Public Sector Equality Duty, which requires that, they have due regard to the need to:

- a) Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under the Act;
- b) Advance equality of opportunity between persons who share a protected characteristic and persons who do not share it; and
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

3.2 The aim of the EqIA is to identify whether people with protected characteristics could be affected by the GM CAP disproportionately or differentially:

- **Disproportionate effects** arise when an impact has a proportionately greater effect on people with protected characteristics than the rest of the population.
- **Differential effects** arise where people with protected characteristics could be affected differently from the rest of the population, due to a particular need or sensitivity.

4 Future development of the Equality Impact Assessment for the GM Clean Air Plan

4.1 The EqIA will be reviewed in line with the findings from the statutory consultation to reflect any changes in the final projects' policies. This will inform a final EqIA for the FBC. Simultaneously, each of the Greater Manchester Local Authorities will develop a specific report for their particular districts, highlighting significant differences in comparison to the GM-wide findings. The ten local reports will act as appendices to the final EqIA for the Full Business Case.

Equality Impact Analysis

Section one: Initial Screening

Analysis Reference	210720
Department	Transport Strategy
Team or Service Area	Clean Air Project
Officer completing the analysis	ARUP
Phone	
Email	
Type of activity	Project
Title of activity	GM Clean Air Plan to tackle Nitrogen Dioxide Exceedances at the Roadside

Under current equality legislation, TfGM is required in the exercise of our functions to have due regard for the need to:

eliminate unlawful discrimination, harassment and victimisation;
advance equality of opportunity between persons who share a relevant characteristic, and persons who do not share it; and
foster good relations between those who have a protected characteristic and those who don't.

Equality Analysis (formally referred to as Equality Impact Analysis (EQIA)) is a tool that will help you to consider equalities issues when drawing up or reviewing a strategy, project, policy, process or procedure which affects the delivery of services and the employment practice of Transport for Greater Manchester (TfGM). Equality Analysis will improve the work of TfGM by making sure it does not unlawfully discriminate against people and that it fulfils its duties under current equality legislation and where possible, it promotes equality.

You will need to demonstrate where appropriate that there has been engagement with beneficiary groups and at the end of this analysis you will need to provide documentary evidence of all the information you have taken into account during this process.

Question 1

Is this a new or existing activity?

Existing

Question 2

What is the main aim and purpose of the activity?

The main aim of this activity is to undertake a feasibility study and produce a region wide plan - the Greater Manchester Clean Air Plan (GM CAP) to address exceedances of nitrogen dioxide. Greater Manchester is taking a collaborative and collective approach to meet the Government requirement to produce a feasibility study in accordance with the HM Treasury's Green Book, identifying the measures that will deliver compliance within the shortest possible time.

The feasibility study has completed the Outline Business Case stage and GM is now ready to consult on the package of measures proposed to tackle nitrogen dioxide exceedances.

These include:

- A chargeable Class C Clean Air Zone across GM
 - o Phase 1: (assumed from 2022) daily penalty for non-compliant buses, taxis/PHV and HGVs
 - o Phase 2: (assumed from 2023) expanding to non-compliant LGVs
- Vehicle Renewal Schemes (financial incentives to upgrade non-compliant vehicles) for Commercial vehicles, Taxis and Private Hire Vehicles and Buses.
- Vehicle Finance – access to affordable finance amongst eligible applicants who require assistance in funding the cost of a

compliant vehicle upgrade.

The proposal DOES NOT IMPACT THE USE OF PRIVATE CARS.

The proposal is being made now to comply with a government requirement. It is being coordinated centrally to ensure consistency across the region and compliance with government guidance.

Question 3

List the main elements of the activity. (for strategies list the main policy areas):

The statutory consultation on the detailed proposals, including the proposed charging Clean Air Zone, will need to be conducted in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.

Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.

In light of the restrictions much of this activity will have to be conducted in a virtual way, using digital tools such as webinars, attendance at virtual meetings and social media. GM will also include opportunity for telephone and postal correspondence for those who may not have digital access.

GM is confident that given the connections made to an extensive number of stakeholders through the Clean Air Conversation in 2019, this will engage with the key audience groups who will be most affected by the proposed measures.

Question 4

If this is a new/proposed activity or a change to an existing activity please explain why the proposal being made for what reason?

This assessment builds on the document that was published at the Outline Business Case (OBC) stage in March 2019, assessing equality impacts in more detail, which has been prepared ahead of the statutory consultation process.

This is an overarching high level impact assessment for the consultation and the local authorities will carry out their own impact assessments at full business case (FBC) stage.

Question 5

What outcomes does the activity aim to achieve?

A feasibility study that sets out the measures proposed to address nitrogen dioxide exceedances in Greater Manchester which has been developed collectively by all Greater Manchester local authorities, and co-ordinated by TfGM, in line with Government direction and guidance.

Question 6

Who are, or will be, the main beneficiaries of the activity?

Please tick one or more of the following

Travelling public	No
TfGM staff	No
Partners including Operators	No
Suppliers	No
Others - please specify	Yes
	People living, working and travelling in Greater Manchester.

Question 7

Do you need to consult with people who might be affected by it directly or indirectly? Please justify your response

Plan to consult - Who do you plan to consult and when?

A programme of research, analysis, public and stakeholder engagement took place throughout 2019 and has continued since submission of the OBC. This has given us more information to identify the potential impact of the proposals on low income workers; key business sectors such as retail and leisure, transport and distribution; and on small local businesses.

A public 'conversation' on the outline proposals ran from 13 May 2019 to 30 June 2019, seeking wide-ranging feedback from the general public, businesses and stakeholders on the proposed measures for achieving compliant NO2 levels in Greater Manchester. Around 3,300 responses were received over the seven-week period, including responses from umbrella groups representing more than 50,000 members. Around 70% of the responses were residents of Greater Manchester and 16% were businesses in Greater Manchester. These results, along with outputs from wider stakeholder engagement with a range of groups, have been used to inform the development of the more detailed proposals.

As required by the Transport Act 2000, a statutory consultation on the more detailed proposals, including the proposed charging CAZ, will be undertaken in 2020. Stakeholder dialogue and other awareness-raising activity around the proposals and the wider issue of air pollution will continue leading up to the consultation on the detailed plan.

The key audience groups for the public conversation are those who will be most affected by the proposed measures.

This engagement will all inform the further development and detailed design of the measures and will help to refine the that will comprise the Full Business Case.

Question 8

Having due regard for equality duty involves:

Removing or minimising disadvantages suffered by people due to their protected characteristics; Taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people; Encourage people with certain protected characteristics to participate in public life or in other activities where their participation is disproportionately low. Please complete the table below and give reasons, evidence and comment, where appropriate, to support your judgement(s).

Use the table below to record where you think that the activity could have a positive impact on any of the target groups or contribute to promoting equality, equal opportunities or improving relations within equality target groups. Use the table below to record where you think that the activity could have an adverse impact on any of the equality target groups i.e. it could disadvantage them and impact is high. Use the last column in the table below to give reason/comments/evidence where appropriate to support your judgement

Equality Impact Analysis

Age			
Target Group	Positive	Adverse	Comment/Evidence
Children and Young People (aged 19 and under)	High	Low	<p>Young people are more sensitive to changes in air quality and will therefore benefit more quickly from improvements in air quality. Young people would therefore benefit differentially.</p> <p>Young people are more reliant on public transport, taxi and PHVs and may also be more likely to use minibuses and community transport. Any changes in provision would have a disproportionate impact on this group in relation to access.</p> <p>Younger people are generally more fit, are more reliant on public transport and generally do not drive. They are therefore more likely to respond to initiatives of behavioural change towards more active forms of travelling.</p> <p>Young people are more reliant on public transport, taxis and PHVs to transport them to places of work, education, and social/leisure activities. Increased travel costs incurred would disproportionately impact this group in terms of affordability.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>

Equality Impact Analysis

<p>Older People (aged 60 and over)</p>	<p>High</p>	<p>Low</p>	<p>Older people are more sensitive to changes in air quality and will benefit more quickly from improvements in air quality therefore having a differential effect.</p> <p>Older people are more reliant on public transport, taxi and PHVs and may also be more likely to use minibuses and community transport. Any changes in provision or fare increases would have a disproportionate impact on this group in terms of access and affordability.</p> <p>Older people are more reliant on public transport, taxis and PHVs to transport them to places of health services and social/leisure activities. Increased travel costs incurred would disproportionately impact this group in terms of affordability.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
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Equality Impact Analysis

Disability			
Target Group	Positive	Adverse	Comment/Evidence
People with physical impairments (Includes mobility, co-ordination, lifting and carrying, manual dexterity, wheelchair user)	Medium	Low	<p>People with certain disabilities (particularly if these relate to respiratory problems) are likely to be more sensitive to changes in air quality and will benefit more quickly from improvements in air quality. This would be a differential effect.</p> <p>People with physical impairments are more reliant on public transport, taxi and PHVs because they are more likely to not drive. They are also more likely to use community transport. Any changes in provision would have a disproportionate impact on this group in terms of accessibility to services, work and social activities.</p> <p>Disabled people are more reliant on public transport, taxis and PHVs to transport them to places of work, education, and social/leisure activities. Increased travel costs incurred would disproportionately impact this group in terms of personal affordability.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>

Equality Impact Analysis

<p>People with communication or sensory impairments (Includes blind/partially sighted, deaf/hard or hearing, difficulty speaking)</p>	<p>Medium</p>	<p>Low</p>	<p>People with certain disabilities (particularly if these relate to respiratory problems) are likely to be more sensitive to changes in air quality and will benefit more quickly from improvements in air quality. This would be a differential effect.</p> <p>People with physical impairments are more reliant on public transport, taxi and PHVs because they are more likely to not drive. They are also more likely to use community transport. Any changes in provision would have a disproportionate impact on this group in terms of accessibility to services, work and social activities.</p> <p>Disabled people are more reliant on public transport, taxis and PHVs to transport them to places of work, education, and social/leisure activities. Increased travel costs incurred would disproportionately impact this group in terms of personal affordability.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
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Equality Impact Analysis

<p>People with a learning disability or cognitive impairment (Includes conditions which affect ability to learn, understand, read, remember, and concentrate eg. Downs Syndrome, autism, ADA)</p>	<p>Medium</p>	<p>Low</p>	<p>People with certain disabilities (particularly if these relate to respiratory problems) are likely to be more sensitive to changes in air quality and will benefit more quickly from improvements in air quality. This would be a differential effect.</p> <p>People with physical impairments are more reliant on public transport, taxi and PHVs because they are more likely to not drive. They are also more likely to use community transport. Any changes in provision would have a disproportionate impact on this group in terms of accessibility to services, work and social activities.</p> <p>Disabled people are more reliant on public transport, taxis and PHVs to transport them to places of work, education, and social/leisure activities. Increased travel costs incurred would disproportionately impact this group in terms of personal affordability.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
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Equality Impact Analysis

<p>People with mental health problems (Includes depression, schizophrenia)</p>	<p>Medium</p>	<p>Low</p>	<p>People with certain disabilities (particularly if these relate to respiratory problems) are likely to be more sensitive to changes in air quality and will benefit more quickly from improvements in air quality. This would be a differential effect.</p> <p>People with physical impairments are more reliant on public transport, taxi and PHVs because they are more likely to not drive. They are also more likely to use community transport. Any changes in provision would have a disproportionate impact on this group in terms of accessibility to services, work and social activities.</p> <p>Disabled people are more reliant on public transport, taxis and PHVs to transport them to places of work, education, and social/leisure activities. Increased travel costs incurred would disproportionately impact this group in terms of personal affordability.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
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Equality Impact Analysis

<p>People with long standing illness/health condition (Includes cancer, HIV, MS, diabetes, heart disease, epilepsy, continence)</p>	<p>Medium</p>	<p>Low</p>	<p>People with certain disabilities (particularly if these relate to respiratory problems) are likely to be more sensitive to changes in air quality and will benefit more quickly from improvements in air quality. This would be a differential effect.</p> <p>People with physical impairments are more reliant on public transport, taxi and PHVs because they are more likely to not drive. They are also more likely to use community transport. Any changes in provision would have a disproportionate impact on this group in terms of accessibility to services, work and social activities.</p> <p>Disabled people are more reliant on public transport, taxis and PHVs to transport them to places of work, education, and social/leisure activities. Increased travel costs incurred would disproportionately impact this group in terms of personal affordability.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
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Equality Impact Analysis

<p>Other disability/impairment not covered by any of the above</p>	<p>Medium</p>	<p>---</p>	<p>People with certain disabilities (particularly if these relate to respiratory problems) are likely to be more sensitive to changes in air quality and will benefit more quickly from improvements in air quality. This would be a differential effect.</p> <p>People with physical impairments are more reliant on public transport, taxi and PHVs because they are more likely to not drive. They are also more likely to use community transport. Any changes in provision would have a disproportionate impact on this group in terms of accessibility to services, work and social activities.</p> <p>Disabled people are more reliant on public transport, taxis and PHVs to transport them to places of work, education, and social/leisure activities. Increased travel costs incurred would disproportionately impact this group in terms of personal affordability.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
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Equality Impact Analysis

Gender			
Target Group	Positive	Adverse	Comment/Evidence
Men	Medium	Medium	Taxi drivers and bus drivers are over 90% more likely to be male than female. Any increased business costs are therefore likely to be disproportionately experienced by men.
Women	Medium	---	There is no evidence that this group would experience disproportionate or differential effects as a result of the GM CAP.
Transgender People	Medium	---	There is no evidence that this group would experience disproportionate or differential effects as a result of the GM CAP.

Race			
Target Group	Positive	Adverse	Comment/Evidence
Asian or Asian British Backgrounds (This includes Pakistani, Indians and Bangladeshi, Chinese or any other Asian background)	High	Low	<p>People from black and minority ethnic community backgrounds are more likely to live in areas of GM where air quality is currently poorest. They will therefore disproportionately benefit from improvements in air quality.</p> <p>People from black and minority ethnic community backgrounds are more reliant on public transport therefore increased costs would affect them disproportionately.</p> <p>A high proportion of taxi drivers are from black and minority ethnic community backgrounds. Any increases in business costs are therefore likely to be experienced disproportionately by this group.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>

Equality Impact Analysis

<p>Black or Black British Backgrounds (This includes Caribbean, African or any other black background)</p>	<p>High</p>	<p>Low</p>	<p>People from black and minority ethnic community backgrounds are more likely to live in areas of GM where air quality is currently poorest. They will therefore disproportionately benefit from improvements in air quality.</p> <p>People from black and minority ethnic community backgrounds are more reliant on public transport therefore increased costs would affect them disproportionately.</p> <p>A high proportion of taxi drivers are from black and minority ethnic community backgrounds. Any increases in business costs are therefore likely to be experienced disproportionately by this group.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
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<p>Mixed /Multiple Ethnic Groups (This includes White and Black Caribbean, White and Black African, White and Asian or any other mixed background)</p>	<p>High</p>	<p>Low</p>	<p>People from black and minority ethnic community backgrounds are more likely to live in areas of GM where air quality is currently poorest. They will therefore disproportionately benefit from improvements in air quality.</p> <p>People from black and minority ethnic community backgrounds are more reliant on public transport therefore increased costs would affect them disproportionately.</p> <p>A high proportion of taxi drivers are from black and minority ethnic community backgrounds. Any increases in business costs are therefore likely to be experienced disproportionately by this group.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
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Equality Impact Analysis

<p>White British Background (This includes English, Scottish & Welsh, Irish and Gypsy or Irish Travellers)</p>	<p>Medium</p>	<p>---</p>	<p>People from a traveller background could potentially be differentially affected by the CAZ charges from an affordability perspective.</p> <p>More insight into this is required at a local authority level when LA specific reports are produced to support the GM EqIA for the FBC.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
<p>Non-British White Backgrounds (This includes Irish, Polish, Spanish, Romanians and other White backgrounds)</p>	<p>Medium</p>	<p>---</p>	<p>More insight into this is required at a local authority level when LA specific reports are produced to support the GM EqIA for the FBC.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>

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Arabs	High	Low	<p>People from black and minority ethnic community backgrounds are more likely to live in areas of GM where air quality is currently poorest. They will therefore disproportionately benefit from improvements in air quality.</p> <p>People from black and minority ethnic community backgrounds are more reliant on public transport therefore increased costs would affect them disproportionately.</p> <p>A high proportion of taxi drivers are from black and minority ethnic community backgrounds. Any increases in business costs are therefore likely to be experienced disproportionately by this group.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
Any other background not covered by any of the above	---	---	

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Equality Impact Analysis

Religion/Belief			
Target Group	Positive	Adverse	Comment/Evidence
Buddhists	Medium	---	<p>In some Greater Manchester Local Authority areas there is a higher percentage of drivers of taxis and private hire vehicles from black and minority ethnic communities (Asian) backgrounds. Any increases in business costs are therefore likely to be experienced disproportionately by this group. There could be a correlation between race and religion, suggesting a potential equality impact for this group.</p> <p>No quantitative evidence has been found to support this.</p> <p>No evidence has been found in this study to suggest a correlation between religion and a differential / disproportionate health impact from improved air quality.</p> <p>More analysis into this is required at a local authority level when LA specific reports are produced to support the GM EqIA for the FBC.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>

Equality Impact Analysis

Christians	Medium	---	<p>No evidence has been found in this study to suggest a correlation between religion and a differential / disproportionate health impact from improved air quality.</p> <p>More analysis into this is required at a local authority level when LA specific reports are produced to support the GM EqlA for the FBC.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
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Equality Impact Analysis

Hindus	Medium	---	<p>In some Greater Manchester Local Authority areas there is a higher percentage of drivers of taxis and private hire vehicles from black and minority ethnic communities (Asian) backgrounds. Any increases in business costs are therefore likely to be experienced disproportionately by this group. There could be a correlation between race and religion, suggesting a potential equality impact for this group.</p> <p>No quantitative evidence has been found to support this.</p> <p>No evidence has been found in this study to suggest a correlation between religion and a differential / disproportionate health impact from improved air quality.</p> <p>More analysis into this is required at a local authority level when LA specific reports are produced to support the GM EqIA for the FBC.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
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Equality Impact Analysis

Jews	Medium	---	<p>No evidence has been found in this study to suggest a correlation between religion and a differential / disproportionate health impact from improved air quality.</p> <p>More analysis into this is required at a local authority level when LA specific reports are produced to support the GM EqIA for the FBC.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
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Appro

Equality Impact Analysis

Muslims	Medium	---	<p>In some Greater Manchester Local Authority areas there is a higher percentage of drivers of taxis and private hire vehicles from black and minority ethnic communities (Asian) backgrounds. Any increases in business costs are therefore likely to be experienced disproportionately by this group. There could be a correlation between race and religion, suggesting a potential equality impact for this group.</p> <p>No quantitative evidence has been found to support this.</p> <p>No evidence has been found in this study to suggest a correlation between religion and a differential / disproportionate health impact from improved air quality.</p> <p>More analysis into this is required at a local authority level when LA specific reports are produced to support the GM EqIA for the FBC.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
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Equality Impact Analysis

Sikhs	Medium	---	<p>In some Greater Manchester Local Authority areas there is a higher percentage of drivers of taxis and private hire vehicles from black and minority ethnic communities (Asian) backgrounds. Any increases in business costs are therefore likely to be experienced disproportionately by this group. There could be a correlation between race and religion, suggesting a potential equality impact for this group.</p> <p>No quantitative evidence has been found to support this.</p> <p>No evidence has been found in this study to suggest a correlation between religion and a differential / disproportionate health impact from improved air quality.</p> <p>More analysis into this is required at a local authority level when LA specific reports are produced to support the GM EqIA for the FBC.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
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Equality Impact Analysis

Others	Medium	---	<p>No evidence has been found in this study to suggest a correlation between religion and a differential / disproportionate health impact from improved air quality.</p> <p>More analysis into this is required at a local authority level when LA specific reports are produced to support the GM EqIA for the FBC.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
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Sexual orientation			
Target Group	Positive	Adverse	Comment/Evidence
Gay men	Medium	---	<p>There is no evidence that this group would experience disproportionate or differential effects as a result of GM CAP.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>

Equality Impact Analysis

Lesbians	Medium	---	<p>There is no evidence that this group would experience disproportionate or differential effects as a result of GM CAP.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>
Bisexual	Medium	---	<p>There is no evidence that this group would experience disproportionate or differential effects as a result of GM CAP.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>

Equality Impact Analysis

Other			
Target Group	Positive	Adverse	Comment/Evidence
Other	High	Low	<p>Extremely low-dose exposures to pollutants during windows of vulnerability in utero and in early infancy may result in health effects throughout their lifespan.</p> <p>Pregnant women will benefit from improvements in air quality. This would be a differential effect.</p> <p>As set out at Q3, during the consultation GM will engage with the key audience groups who will be most affected by the proposed measures. in a way that adheres to guidance around social distancing contained in the Government's COVID-19 recovery strategy.</p> <p>Every reasonable effort will be made to enable residents, businesses and visitors to engage with the consultation materials and respond in a meaningful way to make it as inclusive as possible, in the circumstances.</p> <p>For further information on health impacts: see Q19.</p>

Question 9

If this activity involves new build or alteration to existing building, has any consideration been given to provision of a multi-faith room?

Not applicable

Question 10

Have you identified two or more high adverse impacts in the table above?

No

Question 11

If you have identified one high adverse impact or any medium/low adverse impacts, what improvements to the activity would/could you make to mitigate high/medium/ low adverse impact? Please give details of the improvements you plan to make.

Equality Impact Analysis

Question 12

Have you set up equality monitoring systems to carry out regular checks on the effects your activity has on:

Equality Group		Details
Age	No	Not applicable at this stage - monitoring activity will be developed at the Full Business Case.
Disability	No	Not applicable at this stage - monitoring activity will be developed at the Full Business Case.
Gender	No	Not applicable at this stage - monitoring activity will be developed at the Full Business Case.
Race	No	Not applicable at this stage - monitoring activity will be developed at the Full Business Case.
Religion/Belief	No	Not applicable at this stage - monitoring activity will be developed at the Full Business Case.
Sexual orientation	No	Not applicable at this stage - monitoring activity will be developed at the Full Business Case.
Other	No	Not applicable at this stage - monitoring activity will be developed at the Full Business Case.

Question 13

How will you measure the success of this activity? (Including any corporate performance measures)

The success of the GM CAP will be measured through a programme of outcome and output measurement, which is contained in the draft Monitoring and Evaluation Plan which is an appendix to the Management Case of the Outline Business Case.

The key measure of success will be through air quality monitoring, specifically NO2 compliance.

Question 14

In question 10 above you may have outlined improvements to the activity which will mitigate a high, medium and/or low adverse impact/s. How will you ensure that everyone involved in the activity knows and understands what improvements you intend make and is able to put the activity into practice with those improvements?

Current mitigation measures are set out in the comment boxes. Engagement activity - described in Q7 - will all help to refine the proposals that will be set out in the Full Business Case.

Question 15

Are there any elements within this activity that require a separate Equality Impact Analysis?

No

Equality Impact Analysis

Question 16

Please confirm that during the implementation of this activity, where appropriate, TfGM's corporate strategies and procedures will be followed. If your answer to any of these questions is "no", explain why you will not be following the strategy or procedure.

Strategy/Policy	Yes	Details
Communication with members of the public - TfGM's Corporate Communications Strategy will be followed	Yes	
Procurement - TfGM's Procurement Strategy will be followed	Yes	
Consultation and Engagement - TfGM's Consultation and Engagement Strategy will be followed	Yes	
Projects - Project Management Procedures will be followed	Yes	

Question 17

Is a Full Impact Analysis needed? If in question 8 you identified two or more adverse impacts then you should either abort the activity, or carry out a full analysis

No (not required)

Question 18

List all of the information that you have taken into account in carrying out this Equality Analysis

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4. Clean air zone framework. Principles for setting up clean air zones in England. May 2017. Department for Transport, Department for Food and Rural Affairs.
5. Landrigan, P.J., et al (2018), The Lancet Commission on pollution and health. The Lancet 391:462-512
6. Greater Manchester's Outline Business Case to tackle Nitrogen Dioxide Exceedances at the roadside – Analysis of distributional impacts, Aecom, February 2019.
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17. CAZ Commercial vehicle Socio-Economic Impacts Research, 2019. Hatch Regenesi
18. The Hatch Regenesi report found limited data related to this group of minibus service providers
19. Nomis (2019). Population estimates – local authority based by five year age band. Available at: <https://www.nomisweb.co.uk/reports/lmp/gor/2013265922/report.aspx>
20. ONS (2018) Life expectancy at birth and at age 65 by Local Areas, UK, 2015-2017. Available at <https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/healthandlifeexpectancies/datasets/lifeexpectancyatbirthandage65bylocalareasuk>
21. ONS Area profiles, 2018. Available at: <https://www.nomisweb.co.uk/home/profiles.asp>
22. ONS (2018) Population Estimates for England and Wales Mid-2018. Available at:
23. <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>
24. ONS (2018) Live births in England and Wales down to local authority local area. Available at: <https://www.nomisweb.co.uk/query>
25. ONS (2011) Census data by local authority: ethnic groups UK. Available at: <http://infuse2011.mimas.ac.uk/>
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27. ONS (2017) Sexual orientation, UK:2017. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2017>
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35. Technical Note 3 – GM CAP Freight Market Analysis
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<https://www.gov.uk/government/statistics/blue-badge-scheme-statistics-2018>
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<https://www.nomisweb.co.uk/query>
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Question 19

Additional comments

This is an Equality Impact Assessment (EQIA) for the statutory consultation. A further and fuller assessment of economic and equalities impacts will be required at Full Business Case stage.

A programme of research, analysis, public and stakeholder engagement will continued throughout the consultation period. This will give us more information and identify potential impact of the proposal on low income workers; key business sectors such as retail and leisure, transport and distribution; and on small local businesses. Research information and the feedback from the engagement activity will influence the detailed design of the package of measures.

The EqIA will be reviewed in line with the findings from the statutory consultation to reflect any changes in the final projects' policies. This will inform a final EqIA for the FBC.

Simultaneously, each of the Greater Manchester Local Authorities develop a specific report for their particular districts, highlighting significant differences in comparison to the GM-wide findings. The ten local reports will act as appendices to the final EqIA for FBC.

Health Impacts

There is evidence showing the association of NO2 on poor health outcomes. Epidemiological studies have shown that long-term exposure to air pollution (over years or a lifetime) reduces life expectancy, due to cardiovascular and respiratory diseases and lung cancer. Short-term exposure (over hours or days) to increased levels of air pollution can also have a range of health effects, including effects on lung function, asthma, as well as increases in respiratory and cardiovascular hospital admissions, and mortality. Additionally, outdoor air pollution can influence productivity and contribute to social costs such as increasing days off work and school due to restricted health.

Health impacts – Medium positive impact:

An improvement in air quality as a result of the Clean Air Zone will have a positive impact on the health of the whole population in GM. A result, it is concluded that all protected characteristics will experience at least a medium positive impact in relation to health from the GM CAZ. A further review of health evidence is in progress, to support the final EqIA for the Full Business case.

Health impacts – HIGH positive impact:

Some groups are particularly vulnerable to poor air quality including older people, children (particularly young children), pregnant women and people living with long-term health conditions or disability. Any improvements in air quality are therefore likely to differentially benefit these groups, and they have been assessed as benefitting from a HIGH positive impact from the GM CAZ. Areas of existing high pollution often correlate with low income communities and therefore any improvements in air quality would benefit these communities disproportionately. Economically disadvantaged groups are more likely to include the following protected characteristics: young people, unemployed, long term sick and people from black and minority ethnic community backgrounds. A further review of health evidence is in progress, to support the final EqIA for the Full Business case.

Supporting documents

None

Process signed off by	Megan Black
Date completed	20th July, 2020
Validator's Comments	
Validated by	Diversity and Inclusion Manager
Date validated	2020-07-21
Next Review Date	