

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

Appendix 2 – GM CAP Equality Impact Assessment following Consultation

**Bolton
Council**

Salford City Council

**Bury
COUNCIL**

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METROPOLITAN BOROUGH COUNCIL

**MANCHESTER
CITY COUNCIL**

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Metropolitan Borough

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DRAFT FOR APPROVAL

1 Introduction

- 1.1 This report is the Equality Impact Assessment (EqIA) to support the post consultation process for the Greater Manchester 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.
- 1.3 Transport for Greater Manchester (TfGM) is coordinating the development of the GM CAP on behalf of the ten local authorities and this report utilizes TfGM's EqIA report format, set out in two sections (Section 1: Initial Screening and Section 2: Full Equality Analysis).
- 1.4 This assessment builds on the EqIA document that was published to support the GM CAP Consultation between October and December 2020. It assesses the GM CAP measures detailed in the GM CAP Policy that has been updated to reflect GM's response to the consultation and will support the production of the Full Business Case (FBC) later in 2021.
- 1.5 This report is supported by an Equality Impact Evidence Report for the GM CAP (Appendix of this document). Each of the Greater Manchester Local Authorities have developed a specific report for their particular districts, highlighting significant equality differences in comparison to the GM-wide findings. The ten local reports are contained in appendices to the Equality Impact Evidence Report.

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 particular 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. Economic impacts of the CAP are considered in the post-consultation Economic Implications of the GM CAP report and in the updated Distributional Impacts Assessment report that will support the FBC.
- 2.4 Some of the local authorities in GM do include socio-economic deprivation or low-income households as a characteristic within their Equality Policy. In these cases, socio-economic disadvantage is considered in their EqIA assessment as part of the Equality Impact Evidence Report for the GM CAP (See Appendix).
- 2.5 In addition, some of the local authorities consider other protected characteristics in their EqIA assessments, such as carers and veterans, in line with their local Equality Policy,

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 Final Plan Policy Since the Proposals at Consultation

- 4.1 The proposed final GM Clean Air Plan does not include a Hardship Fund, as proposed at consultation. Although feedback from the consultation and the impact of COVID-19 research found that further support was required for GM businesses, Government Ministers did not agree that a Hardship Fund would be the best way to mitigate the impact of uncertainty due to the pandemic. Ministers cited other COVID-response government schemes (not specific to Clean Air plans) being available to address wider business impacts.

- 4.2 However, Government have confirmed that they wish to ensure that Clean Air Funds can be adapted if necessary; and, that they will continue to work with GM to understand the situation, including the funding position, if the impacts prove to be more severe than forecast.
- 4.3 It remains important to monitor the impact of the CAZ on individuals and businesses that are economically vulnerable and their ability to access the available package of Clean Funds and Vehicle Finance.
- 4.4 The proposed final GM Clean Air Plan does not include a 5/7 discount for GM-licensed PHVs, as proposed at consultation. From an equality perspective, in isolation the removal of the discount would impact PHV drivers, a high proportion of whom are male and from minority ethnic groups¹. However, rather than offering a discount, GM is proposing a temporary exemption to the daily charges of the CAZ until 31 May 2023 for all GM-licensed Private Hire Vehicles and Hackney Carriages and further options for replacement and retrofit are more suitable revisions to the scheme to meet the air quality objectives.

5 Conclusion

- 5.1 The assessment concludes that improved air quality resulting from the GM CAP will have a disproportionate benefit for many protected characteristic groups namely, pregnancy and maternity; older people, young people and children; those with disability or ill-health; and those from minority ethnic and faith groups who are more likely to live in deprived neighbourhoods.
- 5.2 It also concludes that, despite the proposed package of mitigating measures, there is the risk of residual adverse impacts on some protected characteristic groups in relation to personal and business affordability: gender (male drivers), minority ethnic and faith groups. A potential, residual adverse impact in relation to accessibility was also concluded for those with following protected characteristics: older and young people; disability; gender reassignment and sexual orientation. Overall, the assessment recognises that a significant package of temporary and permanent exemptions, discounts and funds has been put in place and that these have reduced the potential negative impact on protected characteristic groups. Having regard to the benefits of the GM CAP the proposals are considered to be justified notwithstanding the remaining risk of disproportionate or differential impacts on protected characteristic groups.
- 5.3 Promotion and accessibility of the mitigating measures to protected characteristic groups will be key to ensuring that those impacted are fully aware of and able to benefit from the support available.

¹ Both licensed PHVs and Hackney Carriages can only be driven by a licensed driver – a vehicle used for taxi services is always a licensed taxi. Therefore, at all times it is a licensed vehicle, rather than a private car. After consideration of the feedback from consultation, GM considered that offering PHVs a discount did not provide parity with other commercial vehicles which are sometimes also used for private travel.

- 5.4 To fulfil their duty under the Equality Act, each of the ten local authorities has undertaken a local assessment and reported any significant variances against the GM-wide assessment, these can be found in the supporting GM CAP Equality Impact Evidence report (see Appendix).

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Equality Impact Analysis

Section one: Initial Screening

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 and the ten Greater Manchester local authorities are required in the exercise of our functions to have due regard for the need to:

- *eliminate unlawful discrimination, harassment and victimization*
- *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.

An Outline Business Case was written in support of the GM CAP in February 2019. Since this time the GM CAP Policy has been developed and refined in response to stakeholder engagement. This assessment builds on the EqIA developed to support the statutory consultation in October – December 2020 and assesses the potential impact of the resulting GM CAP Policy on protected characteristics.

Question 2:

What is the main aim and purpose of the activity?

The government has instructed many local authorities across the UK to take quick action to reduce harmful Nitrogen Dioxide (NO₂) to within legal limit values in the “shortest possible time”. In Greater Manchester, the 10 local authorities, the Greater Manchester Combined Authority (GMCA) and Transport for Greater Manchester (TfGM), collectively referred to as “Greater Manchester” or “GM”, have worked together to develop a Clean Air Plan to tackle NO₂ Exceedances at the Roadside, referred to as GM CAP. TfGM is coordinating the development of the GM CAP on behalf of the ten local authorities.

The primary objective of the GM CAP is to achieve compliance with legal limit values in the shortest possible time. In line with Government guidance, this is the Determining Success Factor by which the programme is appraised.

A feasibility study was undertaken, and an outline business case was completed in 2019. Following this, a package of detailed GM CAP measures was developed and refined. As required by the Transport Act 2000, a statutory consultation on these detailed proposals, including the proposed charging CAZ, was undertaken between 8 October and 3 December 2020². The feedback from the consultation has now been considered and has informed proposed changes to the CAP measures that are reflected in the GM CAP Policy being assessed in this EqIA.

This EqIA is one of a package of reports that supports the GM Authorities Response to the Consultation and the development of the Full Business Case (FBC) for the GM CAP.³

Question 3:

List the main elements of the activity?

The GM CAP proposes a charging Class C Clean Air Zone (CAZ)⁴, with additional measures to tackle nitrogen dioxide exceedances. Under a Class C CAZ owners or registered keepers of the following vehicle types are required to pay a daily charge for driving within the zone, if the vehicle does not comply with the required vehicle emission standards in the Government’s Clean Air Zone Framework⁵:

- Buses
- Coaches
- Heavy Goods Vehicles (HGVs)
- Light Goods Vehicles (LGVs)
- Minibuses
- Licensed Hackney Carriages
- Licensed Private Hire Vehicles (PHVs)

Vehicles which meet the relevant emissions standards will not be subject to charges. A Clean Air Zone Class C does **not** include charging in respect of private cars and motorbikes.

Within the GM CAP, additional measures are proposed to support the transition to compliant vehicles and tackle nitrogen dioxide exceedances in the shortest possible time. These include funds and finance for the retrofit and/or replacement of buses, taxis and commercial vehicles which do not meet the emissions standards required by the CAZ.

The set of supporting measures within the GM CAP Policy are specifically:

- Clean Bus Fund

² <https://cleanairgm.com/clean-air-plans>

³ <https://cleanairgm.com/technical-documents/>

⁴ The Clean Air Zone Framework (May 2017), Dept of Transport and DEFRA classifies Clean Air Zones as being either Class A, Class B or Class C. Class C includes buses, coaches, taxis, PHVs, HGVs and light goods vehicles (LGVs).

⁵ Department for Environment, Food & Rural Affairs and Department for Transport. 2020. Clean Air Zone Framework. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/863730/clean-air-zone-framework-feb2020.pdf

- Clean Commercial Vehicle Fund
- Clean Taxi Fund
- Vehicle Finance
- Taxi Electric Vehicle Infrastructure

Question 4:

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

This assessment builds on the EqIA document that was published to support the GM CAP Consultation between October and December 2020. It assesses the GM CAP measures detailed in the GM CAP Policy that has been updated to reflect GM's response to the consultation and will support the production of the Full Business Case (FBC) later in 2021.

This document is supported by an Equality Impact Evidence Report (see Appendix). The Equality Impact Evidence Report includes appendices from each of the ten GM local authorities, highlighting any specific considerations and variations that apply to each borough.

Question 5:

What outcomes does the activity aim to achieve?

An implementation plan 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	Yes
TfGM staff	No
Partners including Operators	No
Suppliers	No
Others – please specify	Yes All people living , working and travelling into and within Greater Manchester

Question 7:

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

A programme of research, analysis and public and stakeholder engagement has taken place since early 2019. 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, were used to inform the development of more detailed proposals for statutory consultation.

As required by the Transport Act 2000, a statutory consultation on these detailed proposals, including the proposed charging CAZ, was undertaken between 8 October and 3 December 2020⁶. A total of 4,768 responses were received to the consultation from across and outside of GM⁷. Members of the public made up 3,858 of the responses.

441 responses were also received from businesses, with a further 343 from taxi⁸ drivers or operators and 124 from representatives. Additional in-depth interviews, including with taxi drivers and focus groups were carried out.

The feedback from the consultation has been considered and has informed changes to the CAP measures that are reflected in GM CAP Policy being assessed in this EqIA. More detail can be found in the GM Authorities' Response to the Consultation report⁹.

Question 8:

Having due regard for the 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.

It is important to note here that the Covid-19 pandemic has unquestionably highlighted areas of inequality within our society, with those who are already the most vulnerable to health and economic shocks having been most affected. The added economic strain caused by the pandemic on those who are already economically disadvantaged or more vulnerable means that further economic pressures are likely to be experienced more acutely by these individuals, communities and businesses.

The Covid-19 pandemic has already impacted on the timelines for implementing the CAZ, resulting in the implementation of the CAZ being delayed from 2021 to 2022.

Market analysis has been undertaken on the impact of the Covid-19 pandemic on businesses and individuals affected by the CAZ, and the statutory consultation in late 2020 explored the issue further. A report summarising the impact of Covid-19 on the GM CAP has been developed¹⁰. The findings have been considered, the CAP measures refined and fed into the current draft GM CAP Policy which is the basis of this EqIA.

In assessing the equality impacts of the GM CAP, the impacts of Covid-19 are acknowledged as likely to make some of the protected characteristics more vulnerable to the potential unintended consequences of the CAZ. The GM Independent Inequalities Commission report,¹¹ published in March 2021, highlights the disproportionate impact of Covid-19 on communities with protected characteristics including "Workers from 'Other White' ethnic groups were more likely to have lost take-home pay than White British or people of Indian heritage; people from Pakistani, Bangladeshi, Chinese or Other Asian ethnicities were more likely than White British people to worry about their future financial situation"¹².

⁶ <https://cleanairgm.com/clean-air-plans>

⁷ <https://cleanairgm.com/technical-documents/>

⁸ In this report – the term 'taxi' refers to both hackney carriages and private hire vehicles

⁹ <https://cleanairgm.com/technical-documents/>

¹⁰ <https://cleanairgm.com/technical-documents/>

¹¹ https://www.greatermanchester-ca.gov.uk/media/4337/gmca_independent-inequalities-commission_v15.pdf

¹² National data, sourced from Office for National Statistics Why have Black and South Asian people been hit hardest by Covid-19? (December 2020).

Age			
Target Group	Positive Impact	Adverse Impact	Comment or 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 should therefore benefit differentially from the CAZ.</p> <p>Young people are more reliant on public transport and taxis and may also be more likely to use minibuses and community transport. TfGM's travel diary survey (GM TRADs) years 6,7,8 (2017-2019) shows a higher proportion of bus users amongst people aged 19 and under compared to the GM average. Any changes in provision would have a disproportionate impact on this group in relation to access.</p> <p>Young people are more reliant on public transport and taxis 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>
Older People (aged 60 and over)	High	Low	<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 and taxis and may also be more likely to use minibuses and community transport. GM TRADs years 6,7,8 shows slightly higher than average proportion of bus users amongst people aged 60 and over. A retired person with no access to a car is over twice as likely than average to regularly use buses (GM Segmentation – Insights into bus use, Steer Davies Gleave, 2018). 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 and taxis to transport them to places of health services and social/leisure activities. Increased travel costs incurred would disproportionately</p> <p>Over 25% of taxi drivers in GM are over 55 years old (according to a Census carried out in 2020) and the average age of HGV drivers is 57 years according to the Road Haulage Association, therefore any business affordability impacts resulting from the CAZ will have an impact in terms of age.</p>
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Disability			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
People with physical impairments (includes mobility, co-ordination, lifting and carrying, manual dexterity, wheelchair user)	High	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 and taxis because they are more likely to not drive. GM TRADs (TRADs years 678) shows a slightly higher proportion of bus users amongst people with a physical impairment compared to those with no disability or impairment.</p> <p>Analysis of the GM Bus Passenger Survey (2016) found that disabled respondents (with a range of disabilities) were more likely to be reliant on buses and travel on buses due to a lack of other options, than other respondents (Bus Passenger Survey, Transport Focus, 2016).</p> <p>This group 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 and taxis to transport them to places of work, education, and</p>

			<p>social/leisure activities. Increased travel costs incurred would disproportionately impact this group in terms of personal affordability.</p> <p>Some people with disabilities require access to LGV style / adapted vehicles to ensure their independence and/or access to services and leisure. Inclusion of such vehicles in the CAZ could impact on accessibility or affordability for these people.</p>
<p>People with communication or sensory impairments (includes blind/partially sighted, deaf/ hard of hearing, difficulty speaking)</p>	Medium	Low	<p>People with communication or sensory impairments are more reliant on public transport and taxis because they are more likely to not drive. GM TRADs (TRADs years 678) shows a higher proportion of bus users amongst people with a communication or sensory impairments compared to those with no disability or impairment.</p> <p>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 and taxis 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>People with a learning disability or cognitive impairment (includes conditions which affect ability to learn, understand, read, remember and concentrate e.g. Down Syndrome, autism, ADA)</p>	Medium	Low	<p>People with a learning disability or cognitive impairments are more reliant on taxis and public transport, because they are more likely to not drive. GM TRADs (TRADs years 678) shows a higher proportion of bus users amongst people with a learning disability or cognitive impairment compared to those with no disability or impairment.</p> <p>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 and taxis to transport</p>

			them to places of work, education, and social/leisure activities. Increased travel costs incurred would disproportionately impact this group in terms of personal affordability.
People with mental health problems (includes depression, schizophrenia)	Medium	Low	<p>People with mental health problems might be more reliant on taxis and public transport, because they are more likely to not drive. GM TRADs (TRADs years 678) shows a higher proportion of bus users amongst people with a mental health problem compared to those with no disability or impairment. They are also more likely to use community transport.</p> <p>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 and taxis 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>
Other disability / impairment not covered by any of the above			No other groups identified
Gender			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Men	Medium	Medium	Drivers of all the vehicle types subject to the CAZ charge are significantly more likely to be male than female (92% of drivers overall are men with 94% of coach and bus drivers and 96% of taxi drivers being male), and therefore disproportionately more likely to feel the impact of the CAZ in terms of both personal and business affordability.
Women	Medium	Low	GM TRADs years 678, has shown that more women make bus trips than men. Equally, TfGM research has found that women make more trips overall (GM TRADs years 678) and have more activities they rate as important to access than men (TfGM, Access and Inclusion, 2020).

Transgender People	Medium	Low	There is anecdotal evidence to suggest that transgender individuals are more likely to access taxi services in order to safely access services and particularly the night-time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.
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Pregnancy and Maternity			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
People who are pregnant	High	---	Extremely low-dose exposures to pollutants during windows of vulnerability in utero and in early infancy may result in health effects throughout their lifespan.
People who have given birth in the last 26 weeks	High	---	Extremely low-dose exposures to pollutants during windows of vulnerability in utero and in early infancy may result in health effects throughout their lifespan.

Race			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Asian or Asian British Backgrounds (This includes Pakistani, Indians and Bangladeshi, Chinese or any other Asian background)	High	Medium	<p>Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority ethnic backgrounds, so improvements in air quality could benefit minority ethnic groups disproportionately.</p> <p>Over 50% of all hackney and PHV drivers in England are from a non-white British ethnic background and so any CAZ impacts in terms of business affordability will impact minority ethnic groups, and particularly Asian or Asian British groups disproportionately. Analysis of the responses to the GM CAP consultation indicated a high proportion from Asian drivers, concerned about the financial impact of the CAZ particularly in light of reduced business resilience following the Covid-19 pandemic.</p> <p>People from more disadvantaged communities, including those from minority ethnic groups are less likely to own a car and be more reliant on public transport and taxis. Therefore, any change in cost or frequency of services will impact these groups disproportionately.</p>

<p>Black or Black British Backgrounds (This includes Caribbean, African or any other black background)</p>	<p>High</p>	<p>Low</p>	<p>Areas of existing high pollution in GM often correlate with low income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority ethnic backgrounds, so improvements in air quality could benefit minority ethnic groups disproportionately.</p> <p>GM TRADs (TRADs years 678) shows people from Black or Black British backgrounds in GM are more likely than average to be bus users and are more likely than average to use the bus frequently (five or more days a week). Census figures also show this group are more likely than average to use the bus to access work in GM (Census 2011). People from Black or Black British backgrounds in GM are also less likely than average to have access to a car (Census 2011)</p> <p>Over 50% of all taxi drivers in England are from a non-white British ethnic background and so any CAZ impacts in terms of business affordability will impact minority ethnic groups disproportionately. Response to the consultation indicated that drivers and businesses are more vulnerable to business cost increases following the economic effect of the Covid-19 pandemic.</p> <p>People from more disadvantaged communities, including those from minority ethnic groups are less likely to own a car and be more reliant on public transport and taxis. Therefore, any change in cost or frequency of services will impact these groups disproportionately.</p>
<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>Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority ethnic backgrounds, so improvements in air quality could benefit minority ethnic groups disproportionately.</p> <p>Over 50% of all taxi drivers in England are from a non-white British ethnic background and so any CAZ impacts in terms of business affordability will impact minority ethnic groups disproportionately. Response to the consultation indicated that drivers and businesses are more vulnerable to business cost increases following the economic effect of the Covid-19 pandemic.</p> <p>People from more disadvantaged communities, including those from minority ethnic groups are less likely to own a car and be more reliant on public</p>

			transport and taxis. Therefore, any change in cost or frequency of services will impact these groups disproportionately.
White British Background (This includes English, Scottish & Welsh, Irish and Gypsy or Irish Travellers)	Medium	Low	Gypsy or Irish traveller communities often rely on LGV and/or HGV vehicles for income. Anecdotally, these vehicles are older and may not be compliant. In addition, these communities are more removed from local communication channels, and may be less likely to apply for and received funds or finance offered under the CAP. Therefore, this group could be disproportionately impacted by the CAZ.
Non-British White Backgrounds (This includes Irish, Polish, Spanish, Romanians and other White backgrounds)	Medium	Low	Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority ethnic backgrounds, so improvements in air quality could benefit minority ethnic groups disproportionately.
Arabs	High	Low	<p>Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority ethnic backgrounds, so improvements in air quality could benefit minority ethnic groups disproportionately.</p> <p>Over 50% of all taxi drivers in England are from a non-white British ethnic background and so any CAZ impacts in terms of business affordability will impact minority ethnic groups disproportionately.</p> <p>People from more disadvantaged communities, including those from minority ethnic groups are less likely to own a car and be more reliant on public transport and taxis. Therefore, any change in cost or frequency of services will impact these groups disproportionately.</p>
Any other ethnic background not covered by any of the above	---	---	No other group identified.
Religion/Belief			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Buddhists	High	---	Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities

			often have greater populations of people from minority faith backgrounds, so improvements in air quality could benefit these faith groups disproportionately.
Christians	Medium	---	No disproportionate or differential adverse impacts found.
Hindus	High	Medium	<p>Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority faith backgrounds, so improvements in air quality could benefit these faith groups disproportionately.</p> <p>Over 50% of taxi drivers in England are from non-white ethnic groups, and there was a strong Asian response to the GM CAP consultation. Therefore, it is possible there may be a disproportionate affordability impact on Hindu communities as a result of the CAP. It should be noted that no clear quantitative data was identified to directly support this.</p>
Jews	Medium	Low	<p>Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority faith backgrounds, so improvements in air quality could benefit these faith groups disproportionately.</p> <p>There is anecdotal evidence of high use by some Jewish communities in GM, particularly in Salford, of LGV vehicles to support small and micro businesses. Any impact of the CAZ on business affordability would impact on this community.</p>
Muslims	High	Medium	<p>Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these communities disproportionately. These communities often have greater populations of people from minority faith backgrounds, so improvements in air quality could benefit these faith groups disproportionately.</p> <p>Consultation responses indicated a high correlation between Asian Hackney and PHV drivers in GM and the Muslim faith. Therefore, affordability impacts on taxi drivers and operators would impact on those of Muslim faith disproportionately.</p>
Sikhs	High	Medium	Areas of existing high pollution in GM often correlate with low-income communities and therefore any improvements in air quality would benefit these

			<p>communities disproportionately. These communities often have greater populations of people from minority faith backgrounds, so improvements in air quality could benefit these faith groups disproportionately.</p> <p>Over 50% of taxi drivers in England are from non-white ethnic groups, and there was a strong Asian response to the GM CAP consultation. Therefore, it is possible there may be a disproportionate affordability impact on Sikh communities as a result of the CAP. It should be noted that no clear quantitative data was identified to directly support this.</p>
Others	---	---	

Sexual Orientation			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Gay men	Medium	Low	There is anecdotal evidence to suggest that gay men are more likely to access taxi services in order to safely access services and particularly the night-time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.
Lesbians	Medium	Low	There is anecdotal evidence to suggest that lesbians are more likely to access taxi services in order to safely access services and particularly the night-time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.
Bisexual	Medium	Low	There is anecdotal evidence to suggest that bi-sexual individuals are more likely to access taxi services in order to safely access services and particularly the night-time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.

Marriage and Civil Partnership			
Target Group	Positive Impact	Adverse Impact	Comment or Evidence
Marriage and Civil Partnership	---	----	This protected characteristic was out of this assessment as it was assessed that no disproportionate or differential impact would be felt.

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

There is a significant package of measures within the GM CAP Policy to mitigate the potential unintended impacts of the charging CAZ, strengthened in response to the consultation feedback. These have already been considered in the assessment of equality impacts on specific protected characteristics above. Ensuring that those with protected characteristics who are adversely impacted by the GM CAP fully understand and feel that they have access to these mitigating measures is key to take up and to ultimately mitigating equality impacts.

Access to Funding, Discounts and Exemptions

The Funding, Discounts and Exemptions will play a crucial role in mitigating the affordability and accessibility impacts highlighted in this assessment. It is important that the following are considered in their development:

- **Digital exclusion:** Digital channels are to be the principle routes to access information and applications to the Funding, Discounts and Exemptions. The EqIA has highlighted that some protected characteristic groups impacted by the CAZ, such as minority ethnic and faith groups are more likely to live in more deprived neighbourhoods and the assessment also highlighted that older drivers could be impacted disproportionately. In both cases, digital exclusion due to lack of suitable devices or connectivity could be a barrier to accessing the funds, with alternative routes or more support made available to support those that need it.
- **Language and communication barriers:** Some of the impacted groups, such as minority ethnic and faith groups and also those with some disabilities may require additional support to access the information and application processes successfully.
- **Channels of communication:** Some of the protected characteristic groups impacted by the CAZ, particularly ethnic minority and faith groups may be more likely to trust local and informal, peer-to-peer channels of communication. It is important that these local networks are utilised as much as possible to encourage consideration and take-up of the available, mitigating measures.

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	Yes	The GM CAP Monitoring and Evaluation Plan will form an annex to the Full Business Case for the GM CAP. Responsibility for monitoring the impacts on protected characteristic groups highlighted in this assessment, will sit within the Monitoring and Evaluation (M & E) Plan.
Disability	Yes	
Gender	Yes	
Gender Re-assignment	Yes	
Race	Yes	
Religion/Belief	Yes	
Sexual Orientation	Yes	
Maternity and Pregnancy	Yes	
Marriage and civil partnerships	N/a	

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 will be contained in the Monitoring and Evaluation Plan which will be appended to the Full Business Case.

The key measure of success will be through air quality monitoring, specifically compliance with the legal limit values for concentrations of NO₂.

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 to make and is able to put the activity into practice with those improvements?

The outcome of the EqIA is being used to ensure that recommendations are embedded in the service design. In particular, in relation to reducing barriers for impacted groups to access the support that will be available, as detailed in Question 11.

Question 15:

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

No

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		Details
Communication with members of the public – TfGM's Corporate Communications 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 you should either abort the activity, or carry out a full analysis

Yes, see section two. In addition, an Equality Impact Evidence Report (see Appendix) has also been produced and provides more evidence and detail to support this EqIA. The Equality Impact Evidence Report appends the ten individual equality assessments undertaken by the GM local authorities to assess potential local issues.

Question 18:

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

1. Greater Manchester' Outline Business Case to tackle Nitrogen dioxide exceedances at roadside. Equality impact assessment, February 2019. Available at: https://assets.ctfassets.net/qwn52prjtij/p1rQ0jgmSHhnu2zTKKCNY/532bc6ad6b3474017ad6d609820e1f95/Equality_Impact_Assessment__EQIA_.pdf
2. https://www.greatermanchester-ca.gov.uk/media/4337/gmca_independent-inequalities-commission_v15.pdf
3. National data, sourced from Office for National Statistics Why have Black and South Asian people been hit hardest by Covid-19? (December 2020).
4. Public Health England – Air Quality in GM – from a Public Health Perspective (September 2018)
5. Defra – Clean Air Strategy 2018
6. The Clean Air Zone Framework (May 2017), Dept of Transport and DEFRA classifies Clean Air Zones as being either Class A, Class B or Class C. Class C includes buses, coaches, taxis, PHVs, HGVs and light goods vehicles (LGVs).

7. Clean air zone framework. Principles for setting up clean air zones in England. May 2017. Department for Transport, Department for Food and Rural Affairs.
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9. Landrigan, P.J., et al (2018), The Lancet Commission on pollution and health. The Lancet 391:462-512
10. Great Manchester's Outline Business Case to tackle Nitrogen Dioxide Exceedances at the roadside – Analysis of distributional impacts, Aecom, February 2019.
11. Public Health England – Air Quality in Greater Manchester – from a Public Health Perspective (September 2018)
12. DEFRA, Air Pollution in the UK, 2017
13. DEFRA – Clean Air Strategy 2018 (2018)
14. Public Health England, Public Health Outcomes, <http://www.phoutcomes.info/>
15. NHS, Healthy Urban Development Unit (2013), HUDU Planning for Health- Rapid Health Impact Assessment Tool, <http://www.healthyurbandevelopment.nhs.uk/wp-content/uploads/2013/12/HUDU-Rapid-HIA-Tool-Jan-2013-Final.pdf>
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18. GM CAP Draft Policy (post-consultation) - <https://cleanairgm.com/technical-documents/>
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20. ONS (2019) Population Estimates for England and Wales Mid-2019. Available at:
21. <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>
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23. ONS Area profiles, 2018. Available at: <https://www.nomisweb.co.uk/home/profiles.asp>
24. ONS (2019) www.nomisweb.co.uk/query 2019 data for live births
25. ONS (2011) Census data by local authority: ethnic groups UK. Available at: <http://infuse2011.mimas.ac.uk/>
26. ONS (2011) Census data by local authority: religion or belief. Available at: <http://infuse2011.mimas.ac.uk/>
27. Equalities & Human Rights Commission, 'Trans Inequalities Reviewed'. Available at: <https://www.equalityhumanrights.com/en/trans-inequalities-reviewed/introduction-review>
28. Department for Transport (2019) Annual bus Statistics: England 2017/2018 https://assets.ctfassets.net/tlpgbv1k6h2/3fR4HEB016Z572eIRIs8wx/ddfa01e92fb972d2d5297e04c78f046a/37_-_GM_CAP_Vehicle_population_estimates.pdf

29. AECOM (2019) Impact Assessment Technical Note 18 – GM CAP Minibus Vehicle Research
30. SYSTRA (2019) Deliberative Research with Taxi and PHV Drivers/Operators
31. Greater Manchester Transport Topic Paper, 2019. Available at: <https://www.greatermanchester-ca.gov.uk/media/1742/transport-topic-paper-w-cover-web.pdf>
32. Technical Note 19 – GM CAP Taxi and PHV Fleet Research
https://assets.ctfassets.net/tlpgbvy1k6h2/6ufoIhNI2PUaNtgsHZUJpq/b8658d8849db7fb54bd2ea5f21733b1b/19_-_GM_CAP_Taxi_and_Private_Hire_Vehicle_Fleet_Research.pdf
33. AECOM (2019) Impact Assessment Technical Note 19 – GM CAP Taxi and PHV Fleet Research
34. AECOM (2019) Impact Assessment Technical Note 3 – GM CAP Freight Market Analysis
35. GMCA (2021). *Mapping GM*. Available at: GM Open Data Infrastructure Map | MappingGM. (Accessed 15th April 2021).
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38. ONS Area profiles, 2018. Available at: <https://www.nomisweb.co.uk/home/profiles.asp>
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40. ONS (2018) Population Estimates for England and Wales Mid-2018. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>
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44. Department for Transport, 2018. Blue badge scheme statistics:2018. Available at: <https://www.gov.uk/government/statistics/blue-badge-scheme-statistics-2018>
45. Equalities & Human Rights Commission, 'Trans Inequalities Reviewed'. Available at: <https://www.equalityhumanrights.com/en/trans-inequalities-reviewed/introduction-review>
46. ONS Census 2011. KS103EW- Marital and Civil Partnership Status, 2011. Available at: <https://www.nomisweb.co.uk/query/construct/submit.asp?menuopt=201&subcomp=>
47. ONS (2018) Live births in England and Wales down to local authority local area. Available at: <https://www.nomisweb.co.uk/query>
48. ONS (2011) Census data by local authority: ethnic groups UK. Available at: <http://infuse2011.mimas.ac.uk/>

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<http://infuse2011.mimas.ac.uk/>
50. ONS (2019) English indices of deprivation 2019 - local authority district summaries. Available at:
<https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>
51. Air Quality England. <http://www.airqualityengland.co.uk/air-pollution>
52. WHO Topic Sheet. (2018) Ambient (outdoor) air quality and health. [https://www.who.int/news-room/fact-sheets/detail/ambient-\(outdoor\)-air-quality-and-health](https://www.who.int/news-room/fact-sheets/detail/ambient-(outdoor)-air-quality-and-health)
53. Public Health England, Public Health Outcomes, <http://www.phoutcomes.info/>
54. UK Health Alliance on Climate Change, (2018). Moving Beyond the Air Quality Crisis. Realising the health benefits of acting on air pollution. http://www.ukhealthalliance.org/wp-content/uploads/2018/10/Moving-beyond-the-Air-Quality-Crisis-4WEB-29_10-2018-final-1.pdf
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58. Public Health England 2018. Guidance: Health Matters: air pollution. <https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution>
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60. TfGM (2020) GM TRADS, years 6,7 and 8 (2017-19)

Question 19:

Additional comments

None

Supporting documents

Equality Impact Evidence Report, supported by ten Appendices, one from each of the GM local authorities (See Appendix).

Section 2: Full Equality Analysis

Part A

Question 1

Looking back at section one of the EQIA, in what areas are there concerns that the activity could have an adverse impact?

Equality Group	
Age	Adverse Impact
Disability	Adverse Impact
Gender	Adverse Impact
Race	Adverse Impact
Religion/Belief	Adverse Impact
Sexual Orientation	Adverse Impact
Other	
Gender Re-assignment	Adverse Impact
Maternity / Pregnancy	No Adverse Impact
Marriage / Civil Partnership	No Adverse Impact

Question 2

Summarise the likely adverse impacts

The table below summarises the likely adverse impacts of the CAZ. The impact of the wider measures within the CAP programme in terms of mitigating these potential adverse impacts on affected protected characteristic groups is detailed in Question 7 of this document.

Equality Group	Details
Age	<p>Older and younger people are more reliant on public transport as they are less likely to drive or own a vehicle. TfGM's travel diary survey (GM TRADs) years 6,7,8 (2017-2019) shows a higher proportion of bus users amongst people aged 19 and under compared to the GM average and GM TRADs years 678 also shows slightly higher than average proportion of bus users amongst people aged 60 and over. A retired person with no access to a car is over twice as likely than average to regularly use buses (GM Segmentation – Insights into bus use, Steer Davies Gleave, 2018).</p> <p>As such any changes to bus services or cost of bus services could impact the ability of these groups to access health and educational support or employment.</p> <p>Similarly, older people may be less able or confident to use public transport are more likely to use the services of local taxis. Again, a reduction in the number of taxis or an increase in fares could impact this group disproportionately.</p> <p>Statistics suggest that drivers of HGV, LGVs and Taxis are older: at a national level the average age of HGV drivers is 57 years with a GM Taxi Census in July 2020 indicating that 58% were over 45 and 25% over 55 years. Any impact on business costs or viability as a result of the CAZ could impact this group in terms of personal affordability. As drivers near retirement age, their ability or willingness to get credit to upgrade their vehicle could be reduced, further impacting on older drivers.</p>
Disability	Car ownership tends to be low amongst particular equalities groups, such as those with disabilities and some long-term health conditions. This makes

	<p>these groups disproportionately reliant upon public transport networks and taxis which, in their absence or where services are reduced, could lead to isolation and restricted access to social and economic activities that enhance life chances.</p> <p>Qualitative comments within the GM CAP consultation highlighted the reliance of some people with long term health and disabilities on vehicles that could be subject to the CAZ charge, and the impacts caused by loss of those services for these people.</p> <p>Access to reliable and regular bus, minibus, coach and taxi services is particularly important in some communities across Greater Manchester, particularly where tram and trains do not service the local area and in the more rural neighbourhoods on the edge of the city region. Any change in services in these communities would have a greater impact on access for those with ill-health and / or disabilities.</p> <p>Some people with disabilities, or their families / carers, rely on adapted LGV / minibus vehicles to retain independence and / or access vital services.</p>
Gender	<p>Taxi drivers, PHV drivers and bus drivers are over 90% more likely to be male than female; 94% of bus drivers are male and womenintransport.com states that 92% of drivers in the industry are male. Any business cost increases are therefore likely to be disproportionately experienced by men.</p> <p>Over 96% of taxi drivers in England are male of which 81% are self-employed meaning that increases in costs will have a disproportionate impact in terms of both business and personal affordability on men, especially given increased vulnerability in this trade due to the economic impacts of Covid 19.</p> <p>For mothers with children or pregnant women, who do not own private cars, PHVs and hackneys can provide a more convenient alternative to public transport. Reduction in services or increases in fares would impact this group.</p>
Race	<p>Over 50 % of taxi drivers in England are from an ethnic minority, non-white background. Therefore, impacts in costs due to the implementation of the CAZ would have a disproportionate impact on ethnic minority groups in terms of business and personal affordability.</p> <p>People from ethnic minority backgrounds are statistically more likely to live in low-income households and be more reliant on public transport. Therefore, increased costs or reduction in services would affect them disproportionately.</p>
Religion/Belief	<p>The consultation highlighted a high proportion of the ethnic minority taxi drivers in GM were Muslims, indicating that adverse impacts to taxi drivers in terms of personal and / or business affordability will create a corresponding, disproportionate impact in terms of faith.</p> <p>There are other faith communities across GM that could also feel adverse impacts, including the Jewish community in Salford with an anecdotally high percentage of LGV use by local small businesses.</p>
Sexual Orientation	<p>There is anecdotal evidence to suggest that LGBTQ communities are more likely to access taxi services in order to safely access services and particularly the night-time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.</p>

Gender Re-assignment	There is anecdotal evidence to suggest that transgender individuals are more likely to access taxi services in order to safely access services and particularly the night-time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.
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Question 3

What relevant quantitative data has been collected or can be accessed to support this assessment e.g. research projects, monitoring data, documents you have read, statistical information broken down by diverse groups you have reviewed. (A bullet point list is suitable)

Please note that a full list of reference data sources and documents used to inform the GM CAP Equality Impact Evidence report is provided in the initial screening report within this EqIA. These are referenced and attributed fully in the Equality Impact Evidence Report that supports this EqIA (See Appendix 1).

Equality Group	Details
Age	<p>Sources 1: A community baseline was undertaken across GM and the ten local authority areas in 2019 to inform the EqIA for Consultation. This was refreshed in 2021. Census data, ONS Index of Multiple Deprivation and statistics within Nomis were assessed and presented in the full Equality Impact Evidence report (See Appendix 1).</p> <p>Sources 2: TfGM's travel diary survey (GM TRADs) years 6,7,8 (2017-2019)</p> <p>Source 3: The AECOM Consultation Report and accompanying data provided some degree of quantitative data that, though not statistically representative, has been considered in this report</p> <p>Source 4: GM CAP Technical Notes and Deliberative Research reports</p>
Disability	<ul style="list-style-type: none"> Sources 1-3 as listed above. Source 5: GM Independent Inequalities Commission report 2021
Gender	<ul style="list-style-type: none"> Sources 1-4 as listed above
Race	<ul style="list-style-type: none"> Sources 1-3 and 5 as listed above
Religion/Belief	<ul style="list-style-type: none"> Sources 1 as listed above The data from the GM CAP consultation allowed some degree of quantitative analysis by faith that, though not statistically representative could provide indicative evidence.
Sexual Orientation	<ul style="list-style-type: none"> Sources 1 as listed above No further quantitative data was available to support the assessment.
Gender Re-assignment	<ul style="list-style-type: none"> Sources 1 as listed above No further quantitative data was available to support the assessment.
Pregnancy and Maternity	<ul style="list-style-type: none"> Sources 1 as listed above No further quantitative data was available to support the assessment, but no adverse impacts were identified that were not covered under gender.

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Question 4

What relevant qualitative data has been collected or can be accessed to support this assessment e.g. previous consultation or engagement, meetings attended where views of the members of the community, TfGM staff and/or staff from other agencies were given (A bullet point list is suitable)

As per the quantitative data referred to in Question 3, a full list of all supporting data sources is supplied in the Screening Section of this report.

Equality Group	Details
Age	<p>Source 1: The AECOM GM CAP Consultation Report provided qualitative comments that have been considered in the GM Local Authorities Response to the Consultation report, the revised GM CAP Policy and this report</p> <p>Sources 2: GM CAP Technical Notes and Deliberative Research reports</p> <p>Source 3: GM Independent Inequalities Commission report 2021</p>
Disability	<ul style="list-style-type: none"> Sources 1 and 3 as listed above
Gender	<ul style="list-style-type: none"> Sources 1-3 as listed above
Race	<ul style="list-style-type: none"> Sources 1 and 3 as listed above
Religion/Belief	<ul style="list-style-type: none"> Source 1 as listed above
Sexual Orientation	<ul style="list-style-type: none"> Source 4: Anecdotal qualitative information was supplied during engagement with the Local Authority EqIA Working Group for the GM CAP in relation to this group, particularly from Equality and Policy leads from Manchester and Salford.
Gender Re-assignment	<ul style="list-style-type: none"> Source 4 as listed above

Question 5

Give details of any gaps in information you became aware of during initial assessment e.g. lack of monitoring information by disability whereas it is available by race

Equality Group	Details
Age	Census data: For the demographic analysis undertaken for the GM-wide baseline and the local authority appendices, data from the 2011 Census has been used as the latest available Census data. It is recognised that this is a decade old and demographics across the city region have changed during this timeframe. This could have created inaccuracies and gaps in up to date information. 2021 Census data will be available in 2022 and should be reviewed for any changes in relation to protected characteristics.
Disability	Census data issue applies, as above
Gender	Census data issue applies, as above
Race	Census data issue applies, as above

Religion/Belief	Census data issue applies, as above
Sexual Orientation	Census data issue applies, as above Anecdotal qualitative information and local insight from experienced officers within the GM local authorities has been used to inform this assessment.
Gender Re-assignment	Gender identity is not covered within the 2011 Census data and so quantified information about this characteristic group at a GM and local level is limited. The 2021 Census addresses this and should be reviewed to give a more up to date picture, when available. Anecdotal qualitative information and local insight from experienced officers within the GM local authorities has been used to inform this assessment.

Question 6

Evaluate the proposed activity against all the information and evidence you have assembled and make reasonable judgment as to whether the policy is likely to have significant negative consequences for a particular diverse group.

If the evidence you have collected does not indicate whether or not there is likely to be any differential adverse impact, you should think about why this is the case and review the available information within the next 6-12 months. (You will need to outline this in the monitoring section later.

Has the assessment revealed any adverse impact?

Equality Group	
Age	Yes
Disability	Yes
Gender	Yes
Race	Yes
Religion/Belief	Yes
Sexual Orientation	Unable to tell – but anecdotal evidence suggests Yes
Gender Re-assignment	Unable to tell - but anecdotal evidence suggests Yes

If the information gathered suggests there is no differential adverse impact for any of the six equality strands you do not need to complete question 7.

Question 7

If the assessment shows that the proposed activity is likely to have an adverse impact on particular group(s) you should consider other ways of implementing the activity which reduces or eliminates the adverse effect, or which better promote equality of opportunity

Have any changes been made to this policy to remove or reduce the potential for adverse impact?

Equality Group	
Age	Yes
Disability	Yes
Gender	Yes
Race	Yes
Religion/Belief	Yes
Sexual Orientation	Yes
Gender Re-assignment	Yes

The following table summarises how the proposed mitigations within the GM CAP Policy help to reduce the potential adverse impacts on protected characteristic groups.

Mitigation measure	Details of mitigation in particular relation to Equality considerations	Changes post consultation relevant to EqIA	Age	Disability	Pregnancy and maternity	Race	Religion	Sex	Gender Reassignment
Charge exemptions	<p>Permanent exemptions are available that ensure continued access to transport options for those that need it and to fulfil the duty to make reasonable adjustments under section 20 Equality Act 2010.</p> <p>The following exemptions are ones that will impact on protected characteristics:</p> <ul style="list-style-type: none"> • <u>Community Minibuses</u> – Those operating under a permit under section 19 or section 22 of the Transport Act (1985), issued by a body designated by the Secretary of State • <u>Disabled passenger vehicles as classified by the DVLA tax class</u> – vehicles (apart from ambulances) used by organisations providing transport for disabled people. • <u>Disabled Tax Class vehicles</u> - Vehicles used by, or for the purposes of a disabled person which are exempt from vehicle tax, as defined by the vehicle's DVLA Tax Class. • <u>LGVs and minibuses adapted for a disabled user</u> – with a substantial and permanent adaptation and not used for hire or reward 	<p>Addition to exemption of LGVs and Minibuses that are specifically adapted as Disabled User Vehicles</p>	x	x				x	
	<p>Temporary exemptions to 31st May 2023 are available for some vehicles. The following ones will impact on protected characteristics:</p> <ul style="list-style-type: none"> • GM licensed Hackneys & PHVs • Coaches and buses not used on a registered bus service within GM. • LGVs licensed in GM • Minibuses (excluding Community Minibuses, which benefit from a permanent exemption). <p>Temporary exemptions to July 2022 for buses operating on school bus contracts that expire that month.</p>	<p>Addition of temporary exemption of both Hackney and PHVs to recover from the financial effects of Covid-19.</p> <p>Clarification of temporary exemption period to be 12 months after commencement of the CAZ.</p> <p>Short term exemption of school buses where the contract is due to expire in July 2022 to</p>	x	x		x	x	x	x

Mitigation measure	Details of mitigation in particular relation to Equality considerations	Changes post consultation relevant to EqIA	Age	Disability	Pregnancy and maternity	Race	Religion	Sex	Gender Reassignment
		ensure continuity of service.							
Clean bus fund	<p>The Clean Bus Fund aims to mitigate against potential financial impacts on bus service providers, that could result in a reduction in or increase in the cost of bus services caused by the charging. This should help maintain the supply and affordability of these services.</p> <ul style="list-style-type: none"> Open to all registered operators with registered bus services operating in GM It will be available ahead of the CAZ to ensure that service providers can avoid charges and can plan for impact to their business. Level of funding requested has increased since OBC – indicating greater emphasis on mitigating this impact. A grant of up to £16,000 is available to retrofit or replace a non-compliant vehicle 	No change	x	x			x	x	
Clean Commercial Vehicle Fund	<p>The Clean Commercial Vehicle Fund will offer businesses financial support in the form of a lump sum grant OR access to affordable finance to replace or retrofit non-compliant vehicles, reducing the impact of possible charges on their service provision.</p> <p>Eligible businesses include:</p> <ul style="list-style-type: none"> An entity registered with the Charity Commission (including being an active charity and those excepted from registration) A social enterprise <p>This financial support includes support to retrofit or replace coaches and minibuses (not on a registered bus service) which should help to maintain the supply and affordability of community transport.</p> <p>Funding is targeted to support eligible small and micro businesses, sole traders, self-employed, charities, social enterprises and individuals in GM.</p> <p>Following consultation, the funding level has been increased.</p>	<p>Proposed increases in funds for replacement of some vehicles to reflect the market, funding gap between residual value of existing vehicle and a replacement cost and economic impacts of the Covid-19 pandemic on the market.</p> <p>Inclusion of retrofit grants, in addition to replacement grants for LGVs and minibus to reflect changing availability of these options.</p>	x	x				x	

Mitigation measure	Details of mitigation in particular relation to Equality considerations	Changes post consultation relevant to EqIA	Age	Disability	Pregnancy and maternity	Race	Religion	Sex	Gender Reassignment
Clean Taxi Fund	The Clean Taxi Fund will provide funding towards the retrofit of vehicles to meet the GM CAZ emission standards, towards the replacement of non-compliant vehicles with compliant vehicles or towards running costs when the compliant vehicle acquired with GM CAP funds has also been eligible for a Government plug-in grant	<p>Inclusion of non-WAV Hackneys in funding eligibility</p> <p>Increase in maximum grant fund levels for most Hackney and PHV vehicle types</p> <p>The funds do not distinguish between Hackney and PHV vehicles, providing parity across the trade.</p>	x	x		x	x	x	x
Taxi Specific Electric Vehicle Infrastructure	The provision of 40 rapid electric vehicle charging points across GM, to be used specifically by hackneys and PHVs.	No Change	x	x		x	x	x	

The potential residual, adverse impacts of the GM CAP on protected characteristic groups after these mitigation measures are put in place can be summarised as:

Degree of adverse impact with implementation of mitigating measures	Affordability	Accessibility
Medium adverse impact	Sex (male drivers)	-
Low adverse impact	<p>Race</p> <p>Religion</p> <p>Disability</p> <p>Age (young and older people)</p>	<p>Race</p> <p>Disability</p> <p>Age (young and older people)</p> <p>Gender Reassignment</p> <p>Sexual Orientation</p>

Question 8

What consultation or engagement will take place with equality target groups? Give details.

Consultation took place between 8 October and 3 December 2020¹³. A total of 4,768 responses were received to the consultation from across and outside of GM. Members of the public made up 3,858 of the responses.

Part B

Complete this section when consultation and research has been carried out

Question 9

Please summarise in the table below which groups or organisations were consulted with or included in the research. You should briefly record the outcomes of the consultation or research and state whether the results have been fed back to consultees.

Summarise who was consulted/involved in the research (internal and external) and what the nature of the work was	What were the outcomes of the consultation? (Summarise their views including any changes they proposed)	Have the results been fed back to the consultees?
<p>A full consultation report has been prepared by AECOM and will be published in July (subject to local authority approval). The full report is available at https://cleanairgm.com/technical-documents/ and describes the nature of the consultation, who responded to the consultation and the feedback received.</p> <p>The GM response to the consultation findings are detailed in the GM Local Authorities Response to the Consultation report, available at https://cleanairgm.com/technical-documents/.</p> <p>Equality impacts have been considered throughout the development of these reports, and the corresponding changes to the GM CAP Policy. The Equality subject matter expert from the GM CAP lead advisor team reviewed all the responses to issues raised within the consultation and assessed any changes to the GM CAP Policy from an equality perspective. This resulted in the Equality Impact Evidence Report which informs this EqlA (See Appendix 1).</p>		<p>In progress – the AECOM GM CAP Consultation Report and an accompanying GM Local Authorities Response to the Consultation report will be published as part of Local Authority decision making.</p>

Question 10

As a result of this assessment and the available evidence collected, including consultation, state what changes are proposed to your activity.

The changes to the GM CAP policy proposed since consultation that are relevant to protected characteristic groups are detailed in Question 7 above. Equality and socio-economic impacts have been considered throughout the development of the proposals and the changes should significantly mitigate any adverse affordability and accessibility impacts on protected characteristic groups highlighted in this report.

Question 11

Decide whether to progress the activity. If potential adverse impacts have been identified upon any equality target groups and still remain, please provide justification for its implementation.

¹³ <https://cleanairgm.com/clean-air-plans>

Adopt.

Adopt

As described in this assessment, GM has been directed by the Government to introduce a CAZ C and associated measures across the region with the overall aim to reduce harmful Nitrogen Dioxide (NO₂) to within legal limit values in the "shortest possible time". There will be significant positive health benefits as a result of the CAZ for **the whole GM population, including people with protected characteristics**. Those who are younger, older, with a disability or long-term health condition, pregnant and / or from minority ethnic groups are likely to feel this benefit disproportionately.

In addition, significant measures have been put in place to mitigate the potential residual adverse impacts that could result from the GM CAP on some of the protected characteristic groups. These are summarised below. The Equality impact assessment process has assessed the GM CAP in relation to indirect discrimination¹⁴ under the Equality Act definition in section 19 on these groups.

Degree of adverse impact with implementation of mitigating measures	Protected characteristic	Mitigations and assessment of indirect discrimination
Medium adverse impact	Sex (male drivers)	<p>All males in GM will benefit from the cleaner air resulting from the implementation of the CAZ.</p> <p>The mitigations disproportionately support males, as the % of drivers / owners of vehicles in scope for the GM CAZ charge that are male is significantly greater than 50%. The changes to mitigating measures post-consultation are significant, offering temporary exemptions to more vehicle types and increases to funds to reflect market conditions.</p> <p>It is important that those impacted by the CAZ charges have good understanding of and accessibility to the support available through the Funds and are fully aware of the wider package of exemptions and discounts available.</p> <p>On the basis that this is in place, it is concluded that there is no indirect discrimination in relation to males.</p>
Low adverse impact	Race	<p>Improvements in air quality are likely to have a disproportionate benefit on more deprived neighbourhoods in GM. People of minority ethnic background are more likely to live in these areas of GM and are disproportionately more likely to experience benefits from improved air quality.</p> <p>The potential low adverse impact of the CAZ in relation to race, related to personal and business affordability, particularly in relation to PHV and Hackney drivers. The introduction of the temporary exemption across both hackney carriages and PHV post-consultation, as well as the Clean Taxi</p>

¹⁴ where a provision criteria or practice puts a person with a protected characteristic at a particular disadvantage compared with a person that does not share that same characteristic and it cannot be shown to be a proportionate means of achieving a legitimate aim

		<p>Fund and access to vehicle finance all support the mitigation of this potential risk.</p> <p>The revised CAP policy does not distinguish between hackney carriages and PHV in terms of mitigations available, with the funding levels based on whether a vehicle is a Wheelchair Accessible Vehicle (WAV) or not.</p> <p>It is important that those impacted by the CAZ charges have good understanding of and accessibility to the support available through the Funds and are fully aware of the wider package of exemptions and discounts available.</p> <p>On this basis, it is concluded that there is no indirect discrimination in relation to race.</p>
	Religion	<p>Improvements in air quality are likely to have a disproportionate benefit on more deprived neighbourhoods in GM. People of minority faiths are more likely to live in these areas of GM and are disproportionately more likely to experience benefits from improved air quality.</p> <p>The potential low adverse impact of the CAZ in relation to religion / belief related to personal and business affordability, particularly in relation to PHV and Hackney drivers of Muslim faith and LGV drivers, including Jewish drivers of LGVs in Salford. The temporary exemption, as well as the Clean Taxi and Commercial Vehicle Funds and access to vehicle finance all support the mitigation of this potential risk.</p> <p>It is important that those impacted by the CAZ charges have good understanding of and accessibility to the support available through the Funds and are fully aware of the wider package of exemptions and discounts available.</p> <p>On this basis, it is concluded that there is no indirect discrimination in relation to religion.</p>
	Disability	<p>People with certain disabilities or long-term health conditions will benefit disproportionately from improved air quality.</p> <p>However, due to higher reliance on community transport, PHV / Hackney carriages and public transport, there is a low level of residual risk in relation to accessibility to places of education, employment, health support, social activities and worship.</p> <p>Significant measures have been put in place, such as funding, exemptions and discounts that should mitigate the risk that a change in availability of transport services will happen as a result of the GM CAZ that leads to accessibility or cost issues for those with disabilities or health conditions.</p> <p>In addition, higher levels of funding for WAV PHVs and Hackney Carriages have been put in place, as well as permanent</p>

		<p>exemptions for Disabled passenger vehicles as classed by the DVLA tax class, Disabled Tax Class vehicles and LGVs and minibuses adapted for a disabled user to help to mitigate any accessibility or cost impact.</p> <p>As a result, it is concluded that there is no indirect discrimination in relation to people with disability.</p>
	Age	<p>Older and younger people will benefit disproportionately from improved air quality.</p> <p>However, due to higher reliance on public transport, community transport and PHV / Hackney carriages, there is a low level of residual risk in relation to accessibility to places of education, employment, health support, social activities and worship.</p> <p>Significant measures have been put in place, such as funding, exemptions and discounts that should mitigate the risk that a change in availability of transport services leads to accessibility issues for older or younger people.</p> <p>There is a potential low adverse impact of the CAZ in relation to older people related to personal and business affordability, particularly for older people with non-compliant vehicles for whom upgrade does not seem a viable option. The Clean Funds mitigates this risk, with options for both retrofit and replacement for many vehicle types.</p> <p>As a result, it is concluded that there is no indirect discrimination in relation to younger or older people.</p>
	Sexual Orientation	<p>People of all sexual orientations will benefit from the air quality improvements that will result of the GM CAZ.</p> <p>However, there is anecdotal evidence to suggest that LGBTQ communities are more likely to access taxi services in order to safely access services and particularly the night-time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.</p> <p>Significant measures have been put in place, such as funding, exemptions and discounts that should mitigate the risk that a change in availability of transport services will happen as a result of the GM CAZ that leads to accessibility or cost issues for the LGBTQ community.</p> <p>As a result, it is concluded that there is no indirect discrimination in relation to this group.</p>
	Gender Reassignment	<p>However, there is anecdotal evidence to suggest that transgender communities are more likely to access taxi services in order to safely access services and particularly the</p>

		<p>night- time economy in the city centre. This group could therefore be disproportionately impacted by changes in service or cost as a result of the CAZ.</p> <p>Significant measures have been put in place, such as funding, exemptions and discounts that should mitigate the risk that a change in availability of transport services will happen as a result of the GM CAZ that leads to accessibility or cost issues for the transgender community.</p> <p>As a result, it is concluded that there is no indirect discrimination in relation to this group.</p>
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The response to Question 11 in Section 1 of this report highlights mitigations that should be considered to further address the residual adverse impacts namely, increasing the accessibility of vulnerable groups to the Funding, Exemptions and Discounts.

In addition, Question 13 below details the proposed approach to monitoring of the potential equality impacts, both positive and negative. It is important that a rigorous approach to this is adopted to ensure that any unintended impacts on protected characteristics are picked up early and so that interventions can be quickly put in place to minimise these. With the removal of the Hardship Fund from the package of measures and the fact that most of the GM local authorities include socio-economic deprivation / low income as a characteristic within their equality impact assessments, monitoring of the impact of the CAZ on economically vulnerable individuals and businesses will be particularly important. Involvement of the ten local authorities in this, to pick up local intelligence and insights will be key.

On this basis, it is recommended that the GM CAP Policy is adopted.

Question 12

Will the changes planned ensure that adverse impact is :

Legal? (Not discriminatory, under anti-discriminatory legislation)	Yes
Intended?	Yes
Low impact?	Yes

Question 13

How will this activity be monitored and evaluated after full implementation? Give details

A GM CAP Monitoring and Evaluation Plan will form an annex to the Full Business Case for the GM CAP. Responsibility for monitoring the impacts on protected characteristic groups highlighted in this assessment, will sit within the Monitoring and Evaluation (M & E) Plan.

The ten local authority local authority EqIA provide further detail on any specific monitoring and review processes that will be put in place to monitor the equality impacts of the GM CAP at a local level.

Question 14

Publishing the summary of the results of the EQIA helps TfGM to share information with members of the public and other stakeholders. Is there any reason why this Impact Assessment cannot be published? If so, please explain why?

No

Process signed off by	Megan Black
Date completed	June 21

Validator's comments	
Validated by	Donna Cooper
Date validated	June 21
Next review date	

DRAFT FOR APPROVAL