



Equality Impact Assessment Template



Simple Guide and tips

An Equality Impact Assessment (EIA) will help you analyse your policies and practices to make sure they do not discriminate or disadvantage people. However, EIAs also will help to improve or promote equality, access, participation in public life and good relations.

Your EIA should be started during the early stages of your project. Early consideration of equality matters will ensure that your policy, service or function will evolve in line with consideration of equality matters. However, not everything we do will have equality implications, only policies and practices that are relevant to equality need to be put in focus. If you decide after an initial assessment that a policy or practice is not relevant to equality then you should make a note of this. When completing a full EIA make certain the assessment is proportionate to the matters at hand. An EIA is not an end in itself – it is simply a way of ensuring and showing that due regard has been paid to our equality duty.

Where final decisions are made by councillors, in order to show that due regard has been given to the three aims of the equality duty at the time the decision is made, your assessment may need to be included within the report for Committee. The significance of your policy or practice to equality matters may help you make this decision.

All equality impact assessments are based around four core questions. There may well be others that contribute to the assessment, but the core ones remain throughout.

1. **What is the purpose of the policy?**
2. **How is it seeking to achieve this?**
3. **Who benefits and how? (and who, therefore, doesn't and why?)**
4. **What are any 'associated aims' attached to the policy?**



Sections 1 to 3 need to be completed in order to make an initial assessment

Section 4 onwards need to be completed for a full assessment

Stage 1 EIA Tracking ⁱ	
Title of EIA	To licence less polluting and greener taxis.
Lead Officer	Paul Holliday – Principal Licensing Officer
Division	Licensing, Public Protection, Housing & Community
Publication Date <i>(if applicable)</i>	13 September 2023
EIA Review Date <i>(only applicable when completing the full EIA)</i>	



Stage 2 Details of Policy, Service or Functionⁱⁱ

Provide an overview of the policy, service or other function being introduced or reviewed.

Please include the aim or purpose of the policy, service or function etc., any context, changes proposed and the desired outcome. You will need to start to think about the equality implications and whether there is potential for impact on residents, service users and staff (as applicable) with one or more of the protected characteristics.

The Council licenses private hire vehicles (all journeys must be pre-booked in advance through a licensed operator) and hackney carriages (available for immediate hire in the street or at a taxi stand) with an aim to:-

- Protect the public and ensure public safety remains at the centre of the licensing regime.
- Ensure reasonable access to hackney carriage and private hire services.
- That the individuals carrying out the roles of licensed drivers and operators are “fit and proper” to do so.

The Council has a [Hackney Carriage and Private Hire Licensing Policy](#) which includes procedures, practices, and standards relevant to the hackney carriage and private hire licensing regime within the borough of Epsom and Ewell.

The Council has made a clear commitment to tackle climate change, to reduce carbon emissions, and to contribute to improving local air quality. In support of these measures three changes to the taxi licensing policy have been proposed:-

1. To phase in the requirement that licensed vehicles should meet an emissions standard the same as the TFL ULEZ standard. An exemption will be provided for post manufacture wheelchair accessible vehicles, to ensure wheelchair users are not impacted by this proposal.
2. The restriction that all hackney carriages should be purpose-built taxis should be removed, though all taxis will still have to be wheelchair accessible. Purpose-built taxis are more expensive than other wheelchair accessible vehicles, and this proposal is intended to support drivers transitioning to cleaner vehicles. To help with the identification of these new vehicles as hackney carriages they will be required to display an illuminated roof box displaying “Taxi - licensed by Epsom & Ewell Borough Council”
3. The restriction requiring all hackney carriages to be wheelchair accessible should be removed for up to 5 fully electric (Ultra-low Emission) vehicles in order to promote the use of zero emission vehicles while industry catches up with the production of reasonably priced fully electric wheelchair accessible vehicles.



Stage 3 Relevance Check ⁱⁱⁱ	
<p>Indicate whether the policy, function or service change etc. outlined in Stage 2 above has the potential to impact on people with a protected characteristic (covers service users, the wider community and staff).</p> <p>If yes, a full EIA needs to be completed (<i>please go to Stage 4</i>).</p> <p>If no, please set out your reasoning and then secure sign-off by your Head of Service and the Inclusion and Diversity Group at Stage 8.</p>	<p>Proposal 3, that the restriction requiring all hackney carriages to be wheelchair accessible should be removed for up to 5 fully electric (Ultra-low Emission Vehicles) vehicles, has the potential to impact people of a protected characteristic (disability).</p>
Stage 4 Data Relevant to Full EIA ^{iv}	
<p>List all data (including source) and other information relevant to the full equality impact assessment</p>	<p>The Council's own licensing database shows that we currently licence 35 hackney carriages.</p> <p>Taxi and private hire vehicle statistics, England: 2023 show that in England 55% of all taxis were wheelchair accessible. In London, all taxis were wheelchair accessible, whilst in the rest of England 39% of taxis were wheelchair accessible. Currently 100% of Epsom & Ewell BC licensed hackney are wheelchair accessible, and it had been considered that allowing a small percentage of non-WAV electric hackneys could be accommodated whilst still providing accessible hackneys at a higher percentage than nearly everywhere else in the Country, outside major metropolitan areas.</p> <p>In 2020 Reigate & Banstead BC adopted a similar policy – committee report can be found here. Discussions with R&BBC licensing indicate there has been some take up of these electric non-wheelchair accessible vehicles without any noticeable impact on access for disabled people.</p> <p>The Housing and Economic Development Needs Assessment (HEDNA) (produced to support the policy development related to housing and employment land in Epsom & Ewell Borough Council's emerging Local Plan) estimated there were 896 wheelchair user households in Epsom & Ewell in 2022.</p>



Specify all engagement activities undertaken

A six-week public consultation was held on this and other proposals to 'green' EEBC licensed vehicles, which included public notices at the Town Hall, information on the 'Consultations' page of the Epsom & Ewell Borough Council website, posts on via the Councils' official Facebook, Instagram and Twitter accounts (9 posts in total), and a media release that resulted in a councillor being interviewed on BBC Radio Surrey.

As part of the consultation licensing officers held a meeting with representatives of the Surrey Coalition of Disabled People. Their feedback was that they were strongly against any reduction in the percentage of wheelchair accessible vehicle, that wheelchair users want to be part of the future and have the right to be and should be able to access all services.

Age Concern and the management of Swail House were also contacted as part of the consultation but did not respond.

Discussions were held with staff at Epsom Railway station, who help with the transfer of wheelchair users on/off the train. The staff advised they assist with approx. 2 transfers a week, sometimes less. They said there were more wheelchair users who did not need assistance (e.g. they were with people who could help them). Of the few who did need assistance, very few of these wanted directing to or assistance with taxis – most went into town. There were 2 regular wheelchair users who went to Swail House.



Stage 5 Impact on Residents, Service Users and Staff with Protected Characteristics^v

Undertake a full analysis which details all positive and negative impact arising from the policy, service or other function. If there will be no impact, make this clear by completing the relevant box. Please ensure that you evidence your conclusions with reference to the appropriate source.

Protected Characteristic	Potential Positive Impact	Potential Negative Impact	No Impact
<i>Age</i>			x
<i>Disability</i>		x	
<i>Gender Reassignment</i>			x
<i>Pregnancy and Maternity</i>			x
<i>Race</i>			x
<i>Religion and Belief</i>			x
<i>Sex</i>			x
<i>Sexual Orientation</i>			x
<i>Marriage and Civil Partnerships</i>			x

Stage 6 Decision^{vi}



<p>Specify the full details of your decision.</p> <p>Include any changes made to the proposal, steps taken to eliminate or minimise any negative impact(s), any additional mechanisms put in place to meet the needs of particular groups or to help foster good relations etc.</p>	<p>The consultation responses indicated that there was a risk that the introduction of meaningful emissions standards to hackney carriages could further reduce the number of hackney carriages licensed in the short term (despite efforts to mitigate this risk), as drivers decided to leave the trade rather than replace their vehicle with newer or less polluting vehicles. This could then potentially reduce total numbers of wheelchair accessible vehicles available to the public. This is against a background of hackney carriage numbers decline from pre-Covid numbers (currently 35, in 2020 there were over 70).</p> <p>Whilst other proposed changes to the licensing policy are deregulatory and are intended to remove barriers to entering the trade and thereby reverse the decline in numbers, it is not considered that this is the right time to reduce the percentage of hackneys that are wheelchair accessible. If the current decline in hackney numbers is reversed it could be a later policy review could reconsider if there was the need to allow the limited licensing of non-wheelchair accessible electric hackney carriages at a time when total numbers of wheelchair accessible hackneys are increasing, making the likely equalities impact negligible.</p>
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Stage 7 EIA – Action Plan^{vii}

Please specify any action that will be taken to support implementation of your decision

Issue Identified	Action required	Implementation Date	Responsible Officer
<p>The current small number of wheelchair accessible hackneys makes the proposal to allow the licensing of a limited number of non-wheelchair accessible vehicles likely to have a negative equalities impact on disabled people.</p>	<p>If the current decline in hackney numbers being reversed, a future policy review including a new equalities impact assessment could decide whether there is any merit in allowing the licensing of non-wheelchair accessible electric hackney carriages, as a smaller percentage of a larger total number of wheelchair accessible hackneys licensed. If this proposal was revisited at any time a new EIA would be required</p>	<p>If there is clear evidence of a sustainable increase in hackney carriage numbers, the Licensing and Planning Policy Committee could request the proposal be reviewed. The Council's Hackney Carriage and Private Hire Licensing Policy is due for review in 2027 and this will include a review of the licensed vehicle emissions standards.</p>	<p>Paul Holiday</p>



Stage 8 EIA Sign Off ^{viii}	
Head of Service:	Date:
Inclusion & Diversity Group:	Date:

Guidance on completing the Equality Impact Assessment Template

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Stage 1 - EIA Tracking

Insert appropriate details. A review date will only be required when completing the full equality impact assessment (Stages 1 – 8).

ii

Stage 2 - Details of Service / Policy / Function to be assessed

In this section you will need to provide information which explains the subject matter of the work you are undertaking. If a new policy is being developed then explain what the policy covers and what it sets out to achieve. If a policy is being reviewed, then once again explain what the policy addresses and highlight any changes that are being introduced. If the work you are undertaking involves a service change, outline what the current service provides and to whom, then discuss the changes that are proposed and what the outcome of these service changes are anticipated to be. Bear in mind when drafting this section (and the rest of the document) that a lay person, unfamiliar with the subject matter should be able to read it and understand the policy, function or service and any changes that are proposed.

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Stage 3 – Relevance Check

The relevance check asks you to complete an initial assessment of whether the new / reviewed policy, service or function proposed is anticipated to impact upon residents, service users or staff with a protected characteristic. If you consider that there will be some form of impact then you must go on to complete all other stages of the form (Stages 4 – 8 inclusive). If, however, there will be no impact, provide your justification in the space provided and seek formal sign off of your assessment (Stage 8). The form should then be kept in case you need to provide evidence at a later date that you had due regard to the three aims of the equality duty during policy development / service design. If you have any uncertainty at this stage of the process, go on to complete all sections of the Equality Impact Assessment Template (Stages 1-8).

iv

Stage 4 - Data Relevant to Full EIA

In order to undertake a full assessment of the equality implications associated with your project/work you will need to outline the data that you possess which will help you to understand any resultant impact. If you identify any gaps in your information, and thereby have gaps in your



understanding, you will need to fill these areas of uncertainty by exploring what other sources of information there are and/or by talking to different groups/bodies. It may be possible to consult with relevant groups. If you undertake any engagement activities you will need to set them out in this section. Please speak to the Consultation Team in Policy, Performance and Governance if you are considering undertaking consultation.

v

Stage 5 - Impact on Residents, Service Users and Staff with Protected Characteristics

Using the information that you have set out at stage 4 you now need to consider carefully whether the new or revised policy, service or other function etc. will impact upon people with a protected characteristic in a positive or negative way. You will need to consider service users, residents and staff (as appropriate). Set out your considerations for each protected characteristic in the appropriate column. If no impact will arise, please indicate this in the appropriate box to show that you have given due regard to equality. When undertaking this assessment make sure you bear in mind the different forms of discrimination, e.g. direct and indirect discrimination, discrimination by association or perception. The protected characteristic 'marriage and civil partnership' needs only to be considered in relation to the first aim of the equality duty – the need to eliminate unlawful discrimination, harassment and victimisation...

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Stage 6 – Decision

This section requires you to make and evidence your decision. Use your analysis undertaken in Stage 5 together with other relevant factors such as financial implications. The importance that you give equality considerations when making your decision should be proportionate to the significance of the policy, service or function on advancing equality of opportunity and in fostering good relations. Be mindful that your decision could be challenged, the Equality Act 2010 requires you to 'give due regard' to the three aims of the public sector equality duty. A strong evidence base and transparency will lead to effective decision making.

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Stage 7 – Action Plan

In the Action Plan set out any actions that you plan to implement to support your policy, service delivery or change etc. You will need to set a completion date and name a responsible officer. These actions may comprise some form of positive step(s) to support the needs of a particular group or step(s) which will negate any impact on a particular group.

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Stage 8 – EIA Sign Off

This section must be completed by the relevant Head of Service and a copy sent to HRAdmin@epsom-ewell.gov.uk when finishing your assessment at Stage 3 – Relevance Check or when completing the full equality impact assessment, Stages 1-8.

Further information is available from:

['Equality Impact Assessment Introduction and Appendices'](#) .

['Meeting the Equality Duty in Policy and Decision-Making England'](#)

If you need further assistance please speak to a member of the Inclusion and Diversity Group

