Equality Impact Assessment (EIA) Form

Support:

An EIA toolkit, workshop content, and guidance for completing an Equality Impact Assessment (EIA) form are available on the EIA page of the EDI Internal Hub. Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact the Equality, Diversity, and Inclusion (EDI) team by emailing Equalities@Brighton-Hove.gov.uk. If your request is urgent, please mention this in the subject line of your email so we can support as required.

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Business Partner. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to the Equalities team by emailing the Equalities inbox and copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), any other relevant service colleagues to enable EIA communication, tracking and saving.
- Your EIA will be reviewed, discussed, and then approved by the assigned EDI Business Partner and after seeking additional approval as appropriate for your EIA.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the EIA toolkit for more information.

Name of activity or proposal being assessed:	**Moving Traffic Enforcement - Junctions**
Directorate:	City Operations
Service:	City Infrastructure

Team:	Parking Projects
Is this a new or existing activity?	New Activity
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	No

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Tamara Farragher, Senior Projects Officer
Accountable Manager:	Peter Turner, Senior Projects Team Manager
Additional stakeholders collaborating or contributing to this assessment:	Equalities Team

3. About the activity

Briefly describe the purpose of the activity being assessed:

Brighton & Hove City Council has been granted Moving Traffic Enforcement powers under Part 6 of the Traffic Management Act 2004. These powers will enable the council to enforce moving traffic restrictions through automatic enforcement measures at key locations across the city taking a significant step towards enhancing road safety.

A review of recent safety and compliance data has been undertaken across several key locations to understand the level of risk and the extent of non-compliance with existing traffic restrictions. Collision records from the past two years, alongside observed contraventions recorded over a one week period, provide a clear evidence base for considering the introduction of Moving Traffic Enforcement (MTE) within selected junctions within Brighton and Hove.

At **Carden Crescent / Carden Avenue**, where a one-way system operates, between 6th January and 3rd February 2026, 92 contraventions were observed within a single week.

At the **London Road / New England Road** junction, where a prohibited turn is in force, 25 contraventions were recorded over one week and in September 2025, there was one accident between two cars. The level of non-compliance already demonstrates that drivers are continuing to ignore the restriction despite correct signage and lining being present.

The **Ditchling Road / Baker Street** a collision occurred in December 2024. In addition, 57 contraventions were observed in a single week. Again, all signage is correctly installed, yet drivers continue to perform the prohibited turn. This combination of injury-related collisions and ongoing non-compliance highlights the limitations of signage-only measures.

At **Rottingdean High Street / West Street**, where another prohibited turn is in place. A high level of non-compliance was also observed, with 175 contraventions in a single week. This demonstrates persistent disregard for the restriction despite the signage being fully compliant and clearly visible.

For **Francis Street**, in November 2025, a collision between vehicle and pedestrian had also occurred. Many residents and members of the public have also reported that Francis Street is being used as a shortcut to reach London Road.

Camera enforcement will discourage unnecessary through traffic and help ensure the street is used only by vehicles that need access.

Traders will be able to access Francis Street for the open market where required for operational purposes, including deliveries, servicing, loading and unloading. The street will continue to function as an access route for legitimate business activities, supporting the day-to-day operation of market businesses.

There will be no requirement for a permit system or exemptions list - as Francis Street will remain accessible for residents, visitors, deliveries, essential services and traders.

Across all sites, the evidence shows that signage alone is not achieving the required level of compliance, even where it is correctly installed and meets all regulatory standards. The continued high number of contraventions, combined in some cases with injury-related collisions, provides strong justification for implementing Moving Traffic Enforcement (MTE). MTE would support improved compliance, reduce safety risks, and help ensure that restrictions are respected consistently by all road users.

The proposed change relates to the method of enforcement rather than the restrictions themselves, which are already in place and apply equally to all drivers. Compliance with traffic restrictions remains a matter of each and every driver's individual responsibility and all road users are expected to follow the relevant signage and road markings.

The purpose of this Equality Impact Assessment is to consider if the introduction of automatic enforcement measures can create or exacerbate barriers for particular groups in accessing and understanding the information and communications about the new Moving Traffic Enforcement arrangements and navigating or adapting to the new measures. The focus is to ensure that signage, communications and supporting information is clear, inclusive and accessible for all road users, including those with intersecting protected characteristics.

Moving Traffic Enforcement will be rolled out incrementally. This will allow Brighton and Hove residents to get used to the new measures put in place and the council to review impacts, identify barriers, and adjust communications and support to ensure equitable access for all groups

Residents will also have an opportunity to request to have their homes blurred in sight of Automatic Number Plate Recognition (ANPR) cameras.

What are the desired outcomes of the activity?

The desired outcome is to enforce Moving Traffic contraventions using Automatic Number Plate Recognition (ANPR) cameras across the city and subsequently improve compliance:

Dependent on approval from the 15th of October Cabinet, the project will initially focus on the first five locations listed above, this is due to the high number of contraventions:

Carden Crescent / Carden Avenue (Ward: Patcham and Hollingbury)

London Road / New England Road (Preston Park)

Ditchling Road / Baker Street (West Hill and North Laine)

Rottingdean High Street / West Street (Rottingdean & West Saltdean)

Ditchling Road / Francis Street (West Hill & North Laine)

Moving Traffic enforcement may be implemented within further future locations dependant on a future six week consultation, as well as reviewing feedback from the current consultation that is live.

Which key groups of people do you think are likely to be affected by the activity?

Disabled Residents

Disabled drivers - especially those with cognitive impairments, visual impairments, or mobility challenges - may find it more challenging to adjust to changes in traffic restrictions enforcement. If alternative routes are longer or more complex, this could disproportionately affect some disabled people. There is also a risk of increased stress or worry about contraventions. However, all drivers are required to comply with traffic signs and road restrictions, regardless of personal circumstances or previous travel patterns. The key consideration is therefore whether the restrictions, signage and supporting communications are sufficiently clear and accessible to enable all road users to understand and follow them.

People with English as a Second Language

People for whom English is a second language may be more likely to face additional challenges in understanding existing traffic restrictions, especially if they rely on familiarity with local traffic arrangements or on observing other drivers' behaviour. Currently, widespread non-compliance may give the impression that certain turns are allowed. Once enforcement begins, these individuals may be more likely to receive penalties if they have been following the behaviour of others rather than the signage. However, all drivers are expected to follow the traffic signs and road markings in place, regardless of the actions of others The proposed change relates to the method of enforcement rather than the restrictions themselves.

Children and Young People

Children who travel in cars with parents or carers may be indirectly affected if households face financial penalties. For young drivers, who may be less experienced, there is a risk of accidental contraventions leading to fines that have a greater financial impact.

Parents and Carers

Parents and carers often juggle multiple responsibilities and may be more prone to making quick decisions under pressure. If they have previously relied on prohibited turns for convenience, the introduction of automatic enforcement may increase compliance and improve safety, while at the same time requiring some drivers to take longer routes, potentially increasing travel time during school runs or care-related journeys.

Low-Income Households

Financial penalties can have a disproportionate impact on low-income households. If individuals are unaware of the restrictions or have relied on following other drivers' behaviour, they may be more likely to incur fines.

While these restrictions are currently in place, the introduction of automatic enforcement may increase compliance and improve road safety, while, requiring some drivers to use alternative routes and potentially increasing journey times and fuel costs, which can be more burdensome for those on lower incomes. However, these impacts can reduce over time as people adjust to new enforcement measures.

Black and Racially Minoritised Communities

If Black and Racially Minoritised communities are over-represented in areas near the enforced junctions, they may be more exposed to enforcement. There is also evidence in some contexts that racially minoritised groups may have lower access to driving-related information or support, increasing the risk of unintentional contraventions. The key consideration is if signage and written information and supporting communications about the introduction of the automatic enforcement measures are sufficiently clear and accessible to enable all road users to understand and comply with the existing restrictions.

Businesses, Traders and Delivery Drivers

Delivery drivers and traders may experience increased journey times where they have previously relied on using prohibited turns. While these restrictions are currently in place, the introduction of automatic enforcement may increase compliance and improve road safety, while, requiring some drivers to use alternative routes and potentially increasing journey times.

Repeated penalties could also affect small businesses disproportionately. However, these impacts can reduce over time as people adjust to new enforcement measures.

Neurodivergent Individuals

Autistic drivers or those who are neurodivergent, for example people with ADHD may find changes to routine or increased enforcement stressful. Even though signage is unchanged, the shift from a non-enforced to an enforced environment can feel abrupt. Anxiety about making mistakes or receiving fines may be heightened.

Pregnant People

Pregnant people may experience increased fatigue, reduced mobility, or heightened stress, which can affect driving confidence. While these restrictions are currently in place, the introduction of automatic enforcement may increase compliance and improve road safety, while, requiring some drivers to take alternative longer journeys that could be physically uncomfortable. The possibility of receiving penalties may also add stress during a period when wellbeing is particularly important. This impact however can reduce over time as people adjust to new enforcement measures.

The signage, written information and supporting communications about the introduction of the automatic enforcement measures are sufficiently clear and will continue to be clear and accessible to enable all road users to understand and comply with the existing restrictions.

4. 4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

(If no consultation has been done or it is not enough or in process – state this and describe your plans to address any gaps.)

The Moving Traffic Enforcement (MTE) consultation commenced on 18 August 2026. Consultation letters were distributed to residential and business addresses in the surrounding areas, informing recipients of the proposal and inviting them to participate in the survey regarding the introduction of camera enforcement at selected junctions. In addition, a wide range of stakeholders were contacted by email and encouraged to participate through the council's Your Voice consultation platform.

The Parking Projects Team's telephone number and email address were provided within all consultation materials and on the council's website to ensure that residents, businesses and stakeholders can contact the project team with enquiries or request a paper or other accessible format of the survey.

Comprehensive information regarding Moving Traffic Enforcement is available on the Brighton & Hove City Council website, including a dedicated Frequently Asked Questions (FAQ) page. Following the close of the consultation period on 28 September 2026, the FAQ page will be updated to address common themes and questions raised through the Your Voice consultation process.

Prior to enforcement commencing, further notification letters will be issued to residents and businesses in the affected areas advising them of the date on which enforcement cameras will become operational. This information will also be published on the council's website.

To support public awareness and understanding, a six-month warning period will be implemented when enforcement begins. During this period, first-time contraventions at each enforced location will receive a warning notice rather than a Penalty Charge Notice (PCN). The warning notice will include information about Moving Traffic Enforcement and a link enabling the registered keeper to view footage of the contravention. This will help motorists understand the restriction and how the contravention occurred. Any subsequent contraventions may result in the issue of a PCN in accordance with the enforcement process.

Consultation and equality findings

A total of 377 people responded to the consultation. Respondents could comment on more than one proposed enforcement location, resulting in 704 location-specific responses. Of these, 403 were in favour, 253 were against, 24 were neutral and 24 provided no numerical rating.

Consultation feedback identified several issues relevant to the Equality Impact Assessment. Supportive comments commonly referred to road and pedestrian safety, near misses, vulnerable road users, non-compliance with existing restrictions, rat-running, prohibited vehicle movements, speeding and congestion. Concerns included the need for enforcement, traffic displacement, signage, value for money and access.

Equality monitoring

Equality monitoring questions were optional and were not completed by all respondents. Of the 377 respondents:

- 237 answered the age question

- 229 answered the sex question
- 217 answered the gender question
- 204 answered whether their gender differed from their sex assigned at birth
- 211 answered the ethnicity question
- 207 answered the question about long-term health conditions or disability
- 173 answered the religion or belief question

Due to the level of non-response, the demographic information should not be considered representative of all respondents or the wider Brighton & Hove population, but it provides useful information when considered alongside the consultation feedback.

Age

The largest age groups represented were 45 to 54 (55 respondents, 14.6%), 65 to 74 (53, 14.1%) and 55 to 64 (47, 12.5%). Younger people were less represented, with five respondents aged 16 to 24 and none aged 0 to 15.

Comments concerning pedestrian safety, vulnerable road users and near misses are relevant to age, as improved compliance with existing restrictions and reduced prohibited vehicle movements may particularly benefit people who are more vulnerable when navigating the highway, including some older people.

No specific adverse impact associated with age was identified through the consultation.

Disability and health conditions

Of the 377 respondents, 44 reported that their day-to-day activities were limited by a long-term health condition or disability, with 25 saying they were limited a little and 19 saying they were limited a lot.

Respondents also reported a range of health conditions and disabilities, including physical and long-term health conditions, learning differences, hearing impairments, mental health conditions, autism and learning disabilities.

The consultation's recurring concerns around pedestrian safety, vulnerable road users and near misses are particularly relevant when considering disability. Improving compliance with existing traffic restrictions may provide safety benefits for disabled people and others who may experience greater difficulty navigating the highway environment.

No specific adverse impact relating to disability was identified through the consultation.

Sex and gender

Of the 377 respondents, 114 identified their sex as male and 110 as female. For the separate gender question, 106 identified as male and 103 as female, with smaller numbers selecting non-binary or other. Fourteen respondents indicated that their gender differed from their sex assigned at birth.

No specific adverse impacts relating to sex, gender or gender reassignment were identified through the consultation.

Ethnicity

Of the 211 respondents who provided information on ethnic origin, 164 identified as White British, with smaller numbers from a range of other ethnic backgrounds.

The relatively small number of respondents within some ethnic groups, together with the level of non-response, means that robust comparisons between ethnic groups cannot be made. No specific adverse impact relating to race or ethnicity was identified through the consultation.

Religion or belief

Of the 173 respondents who answered this question, the largest groups were those reporting no particular religion or belief (75), Christian (45) and atheist (21), with smaller numbers representing other religions and beliefs.

No specific positive or negative impact associated with religion or belief was identified through the consultation.

Consideration of consultation concerns

Some respondents raised concerns about access and signage, particularly at Francis Street. The proposal is to enforce the existing access-only restriction and does not change existing legitimate access arrangements. Traders will continue to be able to access Francis Street to load and unload, and residents will continue to be able to access and park in their garages.

The consultation feedback has also informed the implementation of the scheme. Following a review of comments about the clarity and visibility of the restriction, additional signage will be put in place before enforcement begins to help make the restriction and access arrangements clearer to road users.

Overall EIA findings

The consultation indicates potential positive equality impacts from improved road and pedestrian safety and greater compliance with existing moving traffic restrictions. These benefits may be particularly relevant to some older and disabled people who may be more vulnerable when navigating the highway environment.

No disproportionate adverse impact on a protected characteristic was identified through the consultation. However, because equality monitoring was optional and some groups were represented by relatively small numbers, the findings should be considered alongside other available equality evidence.

The scheme has also been informed by issues raised during consultation. In particular, existing legitimate access at Francis Street will remain unchanged and additional signage will be provided in response to feedback about the clarity of the restriction. The operation of the schemes will be monitored following implementation to identify any unforeseen equality impacts.

Accessible and Inclusive Engagement

The council is committed to ensuring that consultation and engagement activities are accessible and inclusive. Information has been prepared in clear, plain English and presented in formats

designed to be easy to understand. Written communications use accessible formatting principles, clear headings and subheading, appropriate spacing, and high-contrast colour schemes.

Alternative formats, including Easy Read, large print, audio, translated materials, and other accessible versions, will be made available upon request. All communications include details of how residents and stakeholders may contact the project team to request reasonable adjustments or alternative formats. Requests can be made by telephone, email, or other agreed communication methods. These measures are intended to support participation by disabled people, people with sensory impairments, individuals for whom English is a second language, neurodivergent people, and others who may face barriers to accessing information.

Mitigation of Potential Impacts

The introduction of a six-month warning notice period, alongside advance notification letters to households and businesses, is intended to minimise potential adverse impacts by ensuring that enforcement is introduced gradually and communicated clearly. This approach provides an opportunity for motorists to familiarise themselves with existing restrictions and enforcement arrangements before financial penalties are issued.

This phased approach is particularly beneficial for groups who may face additional challenges in understanding or adapting to changes in enforcement arrangements, including older people, disabled people, pregnant people, people on lower incomes, individuals for whom English is a second language, and neurodivergent people.

Direct communication through letter drops provides an accessible means of reaching local communities, including those who may not regularly access online information or council communications. The council website, FAQ page and dedicated contact details further support access to information and enable residents to seek clarification where required.

The warning period also allows motorists to adapt established travel behaviours that may have developed during periods when restrictions were not actively enforced through camera technology. This reduces the likelihood of unintentional contraventions once full enforcement begins and supports a proportionate and educational approach to implementation.

Taken together, these measures demonstrate a fair, transparent and proportionate approach to introducing Moving Traffic Enforcement. They help to reduce potential barriers to understanding, support compliance with existing traffic restrictions and mitigate potential adverse impacts across a wide range of protected and community groups.

Non-Local Drivers

Drivers travelling into Brighton & Hove from outside the city may be less likely to receive local communications, such as notification letters or community updates, and may therefore be less aware of the introduction of Moving Traffic Enforcement. Although the underlying traffic restrictions and associated signage remain unchanged, some motorists may be unfamiliar with the move to camera enforcement.

Feedback received during the consultation has highlighted the importance of ensuring that existing restrictions are clearly understood. As a result, additional signing and road markings will be reviewed and implemented where appropriate to further improve clarity and assist compliance.

While compliance with traffic restrictions remains the responsibility of all road users, the introduction of automatic enforcement may require some motorists to adjust established travel

behaviours. This may increase the risk of contraventions during the early stages of implementation. The six-month warning period helps mitigate this risk by providing all drivers, including those from outside the city, with an opportunity to become aware of and adapt to the enforcement arrangements before penalties are issued.

Stakeholder Engagement

To help identify and understand any potential impacts arising from the introduction of Moving Traffic Enforcement, the council undertook targeted engagement with a wide range of stakeholders representing protected characteristic groups, transport users, businesses, educational institutions, emergency services, public authorities and community organisations.

The organisations contacted were invited to participate in the consultation and provide feedback on any potential equality impacts, barriers to understanding, accessibility issues or unintended consequences associated with the introduction of camera enforcement. Particular efforts were made to engage organisations representing disabled people, older people, carers, blind and partially sighted people, people with long-term health conditions, people from Black and Racially Minoritised communities and other groups who may face barriers to accessing information or travelling within the city.

Engagement was also carried out with active travel groups, public transport operators, business representatives, local authorities, emergency services and community organisations to ensure that a broad range of experiences and perspectives were considered. Feedback received through the consultation was reviewed and used to inform decision-making, identify any equality impacts and determine whether any additional mitigations are required before implementation.

The following organisations and stakeholder groups were contacted as part of the consultation process:

Community, Equality and Accessibility Groups

- A Seat At The Table
- Able and Willing
- Achieve Together
- Ageing Well
- Amaze
- Age UK
- BADGE (Brighton Access for Disabled Groups Everywhere)
- Beach Access Team (BAT Brighton)
- Black & Minority Ethnic Community Partnership
- Carers Centre for Brighton & Hove
- East Sussex Vision Support (VIABLE)
- Guide Dogs
- Older People's Council
- Possability People
- Scope
- Sussex Ehlers-Danlos Hypermobility Syndromes (SEDS)

- Thomas Pocklington Trust

Transport, Mobility and Active Travel Groups

- 20 Minute Neighbourhoods / Hove Society
- Active Sussex
- Beryl Bikes BTN
- Bricycles
- Brighton Active Travel
- Brighton Bike Hub
- Cycling UK
- Living Streets Brighton & Hove
- Pedal People
- People's Parking Protest
- Rail Future
- Sustrans
- Transport Action Network

Public Transport Operators

- Brighton & Hove Bus Company
- Brighton & Hove Community Transport
- Compass Travel
- Govia Thameslink Railway
- National Express Ltd
- Stagecoach South
- The Big Lemon Bus Company (no contract in Brighton & Hove)

Local Authorities and Public Bodies

- Adur & Worthing Councils
- Brighton & Hove Local Access Forum
- East Sussex County Council – Public Transport
- Rottingdean Parish Council
- South Downs National Park Authority
- Sussex Police
- Sussex Safer Roads Partnership
- Transport for the South East (TfSE)
- West Sussex County Council

Emergency Services

- East Sussex Fire & Rescue Service
- South East Coast Ambulance Service

Business and Commerce

- Brighton & Hove Chamber of Commerce
- Brighton Business Improvement District
- Churchill Square Shopping Centre
- Enterprise Car Club
- Freight Transport Association
- Shoreham Port Authority
- Taxi Trade Representatives

Youth, Education and Community Organisations

- Brighton & Hove Youth Council
- Brighton & Hove Community Works
- South East Community Rail Partnership
- University of Brighton
- University of Sussex

The breadth of stakeholders contacted helps ensure that the views of groups who may be disproportionately affected by the implementation of Moving Traffic Enforcement are considered as part of the council's decision-making process and supports compliance with the Public Sector Equality Duty.

How consultation feedback was used

Feedback received through the consultation was and will continue to be used to:

- Identify any potential equality impacts and barriers experienced by residents, businesses and road users in relation to the introduction of Moving Traffic Enforcement.
- Assess whether consultation materials, signage, road markings and supporting communications are sufficiently clear, accessible and inclusive.
- Understand concerns regarding signage, road markings, camera placement and the visibility of existing restrictions.
- Consider whether any additional measures are required to improve awareness and understanding of the restrictions and enforcement arrangements.
- Review whether any groups with protected characteristics may experience disproportionate impacts and whether further mitigations are necessary.
- Inform any amendments to signage, road markings, communications or other supporting measures prior to implementation.

Early analysis of consultation responses has identified requests for additional signage and improved visibility of restrictions at some locations. These comments will be considered as part of the ongoing review of the scheme to ensure restrictions are communicated as clearly as possible.

The council will continue to monitor consultation feedback and use the findings to inform the final design and implementation of the scheme, while recognising that compliance with traffic restrictions remains the responsibility of individual road users.

Addressing Current Gaps

The public consultation was live for 6 weeks and closed on 28 September 2026.

Following the close of the consultation, the findings will be analysed and presented to Cabinet as part of the decision-making process.

Consultation feedback was used to identify any additional equality impacts, consider whether further mitigations are required, and inform recommendations regarding the implementation of Moving Traffic Enforcement. Suggestions for future Moving Traffic Enforcement locations has also been kept under consideration.

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

(State Yes, No, Not Applicable as appropriate)

Age	Yes
Disability and inclusive adjustments, coverage under equality act and not	Yes
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	Yes
Religion, Belief, Spirituality, Faith, or Atheism	Yes
Sex	Yes
Gender (including non-binary and Intersex people)	Yes
Gender Reassignment	Yes
Sexual Orientation	NO
Marriage and Civil Partnership	NO
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	NO
Armed Forces Personnel, their families, and Veterans	NO
Expatriates, Migrants, Asylum Seekers, and Refugees	NO
Carers	NO
Looked after children, Care Leavers, Care and fostering experienced people	NO

Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	NO
Socio-economic Disadvantage	NO
Homelessness and associated risk and vulnerability	NO
Human Rights	NO
Another relevant group (please specify here and add additional rows as needed)	NO

An equality monitoring section was included within the consultation to help understand the profile of respondents and inform the Equality Impact Assessment (EIA). The questions were optional and covered a range of protected characteristics including age, sex, gender, ethnicity, religion or belief, and disability. This information has been considered alongside the consultation responses to help identify any potential impacts on different groups and support the development of the proposals.

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy, numeracy and /or digital barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

The introduction of Moving Traffic Enforcement will apply equally to all motorists using the affected junctions. While comprehensive equality monitoring data for all road users cannot reasonably be collected, this reflects the nature of the scheme rather than a gap in data collection. Individual motorists using the junctions are not routinely identifiable by protected characteristic, so the potential impacts will need to be assessed through available sources, including feedback from road users, stakeholder engagement and relevant service data.

Further monitoring will be carried out once MTE is implemented to ensure that impacts on all key groups are understood and managed effectively. This will include analysing warning notices issued during the six-month advisory period, reviewing patterns in contraventions, and identifying whether particular groups or locations are disproportionately affected.

Feedback from residents, captured through existing council channels, any complaints or enquiries, will also help highlight emerging issues. In addition, on-street observations and periodic reviews of traffic flow and pedestrian behaviour will support a fuller understanding of how different groups experience the changes.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

To ensure the ongoing fairness and effectiveness of Moving Traffic Enforcement, the service will put in place structured arrangements for monitoring and reviewing its impact. This will include regular analysis of contravention data, particularly during the six-month warning notice period, to identify any emerging patterns or disproportionate impacts on specific groups. Feedback from residents, community organisations, and road users will be gathered through existing council channels to help highlight any issues experienced by elderly older people, disabled residents, people for whom English is a second language, pregnant people, or other groups. For these groups whom English is a second language the warning and PCN notice will give them an opportunity to see their vehicle driving through the contravention area and gain understanding on why they have received a warning notice or PCN.

The service will also review complaints, enquiries, and representations received once enforcement begins, using this information to assess whether additional support or accessible forms of communication are required. Periodic on-street observations and traffic assessments will help understand how behaviour changes over time and whether junctions are operating safely and predictably. These combined monitoring methods will ensure that the impacts of MTE are continually reviewed and that any necessary adjustments can be made to support equitable outcomes for all groups.

6. Impacts

Advisory Note:

- **Impact:**
  - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination) and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
  - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean**: Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
  - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
  - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on

different, and intersecting populations impacted by your activity, especially considering for Health inequalities, review guidance and inter-related impacts, and the impact of various identities.
    - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
    - **Consider a wide range (including but not limited to):**
        - Population and population groups
            - Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council
        - Census and local intelligence data
        - Service specific data
        - Community consultations
        - Insights from customer feedback including complaints and survey results
        - Lived experiences and qualitative data
        - Joint Strategic Needs Assessment (JSNA) data
        - Health Inequalities data
        - Good practice research
        - National data and reports relevant to the service
        - Workforce, leaver, and recruitment data, surveys, insights
        - Feedback from internal 'staff as residents' consultations
        - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
        - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the Equality Act 2010 and about our Public Sector Equality Duty.

6.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: older people, people who may be housebound, those under 16, young adults, with other intersections.	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

According to Dashboard | Local Insight, the following wards have a high proportion of ~~elderly~~ older people:

- Patcham and Hollingbury : 20.40%
- Rottingdean & West Saltdean 29.97%

This data represents that there is a high proportion of older people within specific wards within Brighton and Hove. Brighton and Hove also has a very different age profile compared to the South East and England.

- Fewer children aged 0 to 15 years (15%) – South East (19%), England (19%)
- More working age adults aged 16 to 66 (72%) – South East (64%), England (65%)
- Fewer older people aged over 66 (13%) – South East (17%), England (16%)

Source: ONS 2021 Mid-Year Population estimates

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Positive impacts of introducing Moving Traffic Enforcement within Brighton ad Hove for Children and young people is the following:

- Safer travel for children and young people through reduced dangerous driving and calmer streets
- Cleaner air and lower exposure to harmful pollutants
- More opportunities for active, independent travel such as walking and cycling if people are able to do so

Negative impacts:

- Some drivers may experience inconvenience or frustration as restrictions become more strictly enforced
- Children who travel in cars with parents or carers may be indirectly affected if households face financial penalties. For young drivers, who may be less experienced, there is a risk of contraventions leading to fines that have a greater financial impact.

Positive impacts of introducing Moving Traffic Enforcement within Brighton and Hove for Older people (65+) is the following:

- Safer pedestrian environments with reduced traffic violations.

Negative impacts:

- Financial impact of penalties for those who face barriers to accessibility of information and communications about the new enforcement measures.

There are several potential mitigations:

- Ensure that information and communications about the new automatic enforcement measures are available in accessible formats such as for example large print, Easy Read or British Sign Language (BSL) and variety of languages when requested
- Use plain English in all communications.
- Translate key information and materials into community languages when requested.
- Implement a grace period with warning notices before full enforcement begins.

- Ensure the PCN appeals process is clearly explained, accessible, and easy to navigate.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	YES

If "YES", what are the positive and negative disproportionate impacts?

The positive impacts for implementing Moving Traffic Enforcement within Brighton and Hove for those who are disabled are the following:

- Safer road conditions benefit wheelchair users and people with restricted mobility who use mobility aids while crossing the roads.

Potential negative impacts:

- Disabled drivers - especially those with cognitive impairments, visual impairments, or mobility challenges - may find it more challenging to adjust to changes in traffic restrictions enforcement. If alternative routes are longer or more complex, this could disproportionately affect some disabled people. There is also a risk of increased stress or worry about contraventions. However, all drivers are required to comply with traffic signs and road restrictions, regardless of personal circumstances or previous travel patterns. The key consideration is therefore whether the restrictions, signage and supporting communications are sufficiently clear and accessible to enable all road users to understand and follow them.
- Anxiety about penalty notices.
- Disabled people may face barriers to accessing the information and communications about the new enforcement measures. The key consideration is therefore whether the restrictions, signage and supporting communications are sufficiently clear and accessible to enable all road users to understand and follow them.

Nearly one in five residents (51,797 people, 19%) in Brighton & Hove are disabled as defined by the Equality Act. This is higher than seen in both the South East (16%) and England (17%).

Among disabled residents, for two out of five (20,351, 39%) their day-to-day activities are limited 'a lot' and for three in five (31,446 people, 61%) their activities are limited 'a little'. Both proportions are similar to what is seen in the South East and England.

Over four out of five residents (225,306 people, 81%) are not disabled as defined by the Equality Act. This is lower than seen in both the South East (84%) and England (83%).

Source: ONS 2021 UK Population Census

Brighton and Hove City Council will reduce barriers faced by older people by:

- Ensuring that information and communications about the new automatic enforcement measures are available in accessible formats such as for example large print, Easy Read or British Sign Language (BSL) and variety of languages when requested
- Using plain English in all communications.

- Implementing grace period with warnings before full enforcement begins (6 months' warning notices to allow people to get used to the new measures).

What inclusive adjustments are you making for diverse disabled people impacted? For example: those who are housebound due to disability or disabling circumstances, D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

Inclusive adjustments include:

- Ensuring that information and communications about the new automatic enforcement measures are available in accessible formats such as for example large print, Easy Read or British Sign Language (BSL) and variety of languages, when requested.
- Using plain English in all communications.
- Keep Parking Projects email and phone number on Moving Traffic Enforcement Web content page.

Brighton & Hove City Council is making inclusive adjustments to ensure that disabled people and people with access requirements can fully participate in the consultation. This includes adjustments for people who are housebound, D/deaf, have hearing or visual impairment, are neurodivergent, people with non-visible disabilities, and people with intersecting identities (e.g., Black and disabled, LGBTQIA+ and disabled).

Accessible alternatives to the online survey

For those who cannot complete the online survey, the council will provide an alternative method:

- People will be able to call a dedicated phone number and leave a message requesting a paper or other accessible copy of the consultation.
- Individuals can also ask questions in the voicemail, and the council will respond within 2 working days. This supports people who are housebound, digitally excluded, or who require non-digital formats.

Accessible communication channels

To reach people who do not have internet access or who rely on alternative formats:

- A press release will be issued in local newspapers.
- Information will be available on the council website in clear, plain language.
- The council will communicate directly with charities, disability organisations, community groups, and advocacy networks so they can share information with their members, including people with complex or intersecting access requirements.
- Posting physical letters in neighbourhoods around MTE junctions

Inclusive outreach

The council will ensure that organisations supporting:

- D/deaf and hearing impaired people
- Blind and visually impaired people
- Neurodivergent people
- People with learning disabilities
- People with long-term health conditions
- People with non-visible disabilities
- Intersectional groups (e.g., Black disabled people, LGBTQIA+ disabled people)

receive consultation information and can distribute it through their networks.

Equality monitoring

Brighton & Hove City Council will achieve equality insight by including equalities monitoring questions in both paper and digital consultations. These questions help identify whether different groups are being reached and whether the proposals may affect people differently.

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive impacts for implementing Moving Traffic Enforcement:

- Reduced traffic improves safety for children and families from all ethnic backgrounds, especially in areas with higher pedestrian activity

Negative Impacts:

- Disproportionate financial impact in communities with lower average incomes.
- If Black and Racially Minoritised communities are over-represented in areas near the enforced junctions, they may be more exposed to enforcement. There is also evidence in some contexts that racially minoritised groups may have lower access to driving-related information or support, increasing the risk of contraventions.
- People for whom English is a second language may be more likely to face additional challenges in understanding existing traffic restrictions, especially if they rely on familiarity with local traffic arrangements or on observing other drivers' behaviour. Currently, widespread non-compliance may give the impression that certain turns are allowed. Once enforcement begins, these individuals may be more likely to receive penalties if they have been following the behaviour of others rather than the signage. However, all drivers are expected to follow the traffic signs and road markings in place, regardless of the actions

of others The proposed change relates to the method of enforcement rather than the restrictions themselves. The key consideration is if signage and written information and supporting communications about the introduction of the automatic enforcement measures are sufficiently clear and accessible to enable all road users to understand and comply with the existing restrictions.

- The council is only enforcing what is already on street and should be legally followed regardless of enforcement.

The potential mitigations for these negative impacts would be the following:

- Ensuring that information and communications about the new automatic enforcement measures are available in accessible formats and variety of languages.
- Using plain English in all communications.
- Implementing grace period with warnings before full enforcement begins (6 months' warning notices to allow people to get used to the new measures).
- Include an accessibility statement for relevant communications, outlining our approach to supporting access requirements, and how people can let us know about any access requirements.
- Ensure clear appeals process is accessible.
- Keep a contact number and email on the council's webpages

According to *Dashboard* | *Local Insight*, several wards in Brighton & Hove have notable proportions of residents from Black and Racially Minoritised backgrounds. For example, Kemptown has 0.12% White Gypsy or Irish Traveller residents and 1.99% Indian residents; Round Hill has 11.54% of residents recorded as "Any other combination of multiple ethnic groups – White and Non-British" (Census 2021); and Regency has 1.69% categorised as "Other Asian".

This data demonstrates that Brighton & Hove is home to diverse communities, and it is essential that the Council ensures Moving Traffic Enforcement is implemented in an inclusive and accessible way. This includes making sure that all residents, including those driving into the city, are aware of the new enforcement measures. Clear communication, accessible information, and the mitigations outlined above will help ensure that no group is disproportionately affected.

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Based on a voluntary question from the 2021 Census;

- Over a half of residents (152,966 people, 55%) have no religion or belief. Significantly higher than seen in the South East (40%) England (37%) and the highest proportion of residents with no religion in England (upper tier local authorities).
- 19,760 residents (7.1%) did not answer the question
- Compared to the South East and England, Brighton and Hove has proportionally:

  More – Buddhists (2,455 people, 0.9%), Jews (2,455 people, 0.9%), and other religions (2,860 people, 1.0%)

  Fewer - Christians (85,629 people, 30.9%), Muslims (8,500 people, 3.1%), Hindus (2,100 people, 0.8%) and Sikhs (378 people, 0.1%)

Various impacts relating to religion are as follows:

Positive impacts

- Safer and more predictable travel routes may support people of faith who regularly travel to places of worship, community centres, or cultural events
- Calmer traffic conditions can make it easier for older or mobility-impaired worshippers to access religious sites safely

Negative impacts

- Potential confusion or concern among faith communities if enforcement changes are not communicated clearly or in culturally appropriate ways
- Risk of disproportionate impact on individuals who rely on car travel to attend places of worship, especially where public transport is limited or services occur outside peak hours
- Some people within faith communities may experience barriers in accessing or understanding information about the existing traffic restrictions and the introduction of automatic enforcement measures or the PCN appeals process where English is their second language.

Mitigations

- Ensuring that information and communications about the new automatic enforcement measures are available in accessible formats and variety of languages, when requested
- Using plain English in all communications.
- Include Parking Projects email and phone number on council's Moving Traffic Enforcement webpages, so that people can call and ask questions
- Implementing grace period with warnings before full enforcement begins (6 months' warning notices to allow people to get used to the new measures).
- Non-digital support options, such as telephone helplines or printed information, to assist those who may face barriers when accessing online systems
- Ongoing monitoring to identify any disproportionate impacts on religious communities and adjusting communication or support where needed

6.5 Sex:

Does your analysis indicate a disproportionate impact relating to Sex	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

According to 2021 Census, there was estimated to be 141,000 female (51%) and 135,400 male (49%) residents in the city.

There are several positive impacts that may play out across gender lines. For example,

Positive impacts across gender lines

- Safer junctions can particularly benefit women and girls, who are statistically more likely to report concerns about personal safety when travelling, especially in areas with fast or unpredictable traffic
- Calmer, more predictable traffic conditions support carers, a role disproportionately held by women, by making multi-stop journeys with dependants safer and less stressful
- More reliable junction behaviour can support men, who are statistically more likely to be drivers and therefore benefit from clearer, more consistent traffic flows

Negative impacts across gender lines

- Women and girls may feel increased anxiety if they are unsure about new junction enforcement measures, especially when travelling alone or at night
- People with caring responsibilities (disproportionately women) may experience inconvenience if journeys involving multiple stops become longer due to stricter junction enforcement
- Men, who are statistically more likely to drive, may feel more directly affected by enforcement measures or perceive them as punitive.

Mitigations

- Clear, accessible communication explaining the purpose of MTE, how it works, and where it applies, helping reduce uncertainty for all genders
- Targeted engagement with groups disproportionately affected, such as women's organisations, carers' networks, and community safety groups
- Use of multiple communication channels (print, online, community venues) to ensure information reaches people regardless of digital access or caring responsibilities
- Monitoring gender-related impacts to identify whether any group is disproportionately affected and adjusting communication or support accordingly

6.6 Gender and Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Identity (including non-binary and intersex people)?	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive impacts for non-binary people:

- Safer and more predictable junctions can support non-binary people who may experience higher levels of harassment or discomfort in public spaces, making travel feel more secure
- Clearer, more consistent traffic behaviour can reduce anxiety for non-binary people who may feel less confident navigating busy or unpredictable junctions
- More inclusive public spaces created through calmer traffic can contribute to a sense of belonging and safety for people of all gender identities

Negative impacts for non-binary people are as follows:

- Increased enforcement can sometimes lead to heightened surveillance. For non-binary people, especially those who may already face profiling or discrimination, this can create discomfort or fear in public spaces.

Mitigations for all of the negative impacts stated above will be the following:

- Allowing residents to have the opportunity to have their properties blurred out when requested to do so.
- Use inclusive language and imagery in all communications about MTE to ensure non-binary people feel represented and respected. Monitor impacts across gender identities, including non-binary people, and adjust communication or support if any disproportionate effects are identified
- Offer 6-month warning notices.

Does your analysis indicate a disproportionate impact relating to Gender Reassignment?	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The 2024 Health Counts survey found that approximately 1 in 20 adults (5%) living in Brighton and Hove are trans, non-binary or intersex.

Based on a voluntary question from the 2021 Census:

In Brighton & Hove a total of 220,742 residents (93.8%) of the population aged 16 years and over answered the following questions:

• A total of 218,401 residents (92.8%) answered "Yes", indicating that their gender identity was the same as their sex registered at birth.

• A total of 2,341 residents (1.0%) answered "No", indicating that their gender identity was different from their sex registered at birth. Within this group:

- 476 (0.2%) answered "No" but did not provide a write-in response
- 362 (0.1%) identified as a trans man
- 329 (0.1%) identified as a trans woman

- 1,174 (0.5%) wrote in a different gender identity

Negative impacts for those that have undertaken gender reassignment is that:

- For individuals undergoing gender reassignment, especially those who may already feel vulnerable in public spaces, having ANPR cameras implemented may heighten anxiety or fear of being misgendered or profiled. This negative impact may be mitigated by allowing residents to have the opportunity to have their properties blurred out when requested to do so.

Positive impacts:

- Trans people, like others, benefit from reduced traffic aggression and improved pedestrian safety. Enforcement helps create calmer, more predictable spaces around schools.
- Inclusive enforcement schemes often involve community consultation. Trans voices in these processes help shape safer, more welcoming ~~school zones~~ neighbourhoods.

6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation?	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Based on a voluntary question from the 2021 Census:

- Around 189,745 people (80.6%) identified as straight or heterosexual.
- Around 25,247 people (10.6%) identified with an LGB+ orientation (Gay or Lesbian, Bisexual or Other sexual orientation).
- The remaining 20,375 people (8.7%) did not answer the question.
- The proportion of residents aged 16 and over in Brighton & Hove identifying with an LGB+ orientation (10.6%) is three times higher than seen in both the South East (3.1%) and England (3.1%).
- The proportion of residents aged 16 and over in Brighton & Hove identifying with an LGB+ orientation (10.6%) is the highest proportion seen in any upper tier authority in England.

The following wards had a high number of Bisexuals:

Hanover and Elm Grove: 7.07%

Round Hill: 7.20%

West Hill and North Laine: 6.07%

Positive and negative impacts will be the following:

Positive impacts

- LGBTQ+ parents and caregivers, including same-sex couples, co-parenting arrangements, and chosen families, benefit from safer, more predictable junctions when travelling
- Busy, chaotic junctions can heighten vulnerability to street harassment or homophobia; calmer, enforced junctions reduce crowding and stress, helping LGBTQIA+ people feel more secure
- Inclusive enforcement schemes often involve community consultation, giving LGBTQIA+ residents opportunities to shape safer, more welcoming public spaces around key junctions

Negative impacts

- Some LGBTQIA+ people may feel increased anxiety if communication about new junction enforcement measures is unclear or does not reflect diverse identities and family structures
- Past negative experiences with public services may lead to mistrust or reluctance to engage with information about enforcement or PCN processes

Mitigations

- Use inclusive language and imagery in all MTE communications to ensure LGBTQIA+ people feel represented and respected
- Work with local LGBTQIA+ organisations, community groups, and Pride networks to share information and understand specific concerns
- Provide multiple communication formats, including non-digital options, to ensure accessibility for those who may avoid online systems
- Monitor impacts across sexual orientation and gender identity to identify any disproportionate effects and adjust communication or support accordingly
- Implement 6-month warning notices to allow people to get used to the new enforcement measures.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

According to Local Insight (Census 2021:

One family only: Married or same-sex civil partnership couple: No children (Census 2021):

Rottingdean & West Saltdean13.64%

One family only: Married or same-sex civil partnership couple: Dependent children:

Hollingdean and Fiveways: 18.27%

One family only: Married or same-sex civil partnership couple: All children non-dependent:

Rottingdean & West Saltdean (Saltdean primary): 5.43%

Based on a voluntary question from the 2021 Census;

- Only a third of Brighton & Hove residents (33%, 77,241 people) aged 16 or older are married or in a civil partnership. This is significantly lower than seen in the South East (48%) and England (45%). Among residents married or in a civil partnership, 3,867 residents (5%) are in a same sex marriage or civil partnership.
- Among all residents aged 16 or older, 3,867 people (1.6%) are in a same sex marriage or civil partnership. This is three times higher than seen in the South East (0.4%) and England (0.4%) and proportionally the highest number of residents in a same sex marriage or civil partnership in England (upper tier local authorities).

As Local Insight presents that there are various types of families within Brighton and Hove, implementing Moving Traffic Enforcement may lead to various negative impacts, such as the following:

- Anxiety about penalty notices and complex appeals.

Potential mitigations for these negative impacts are the following:

- Ensure clear appeals process is accessible.

Implementing Moving Traffic Enforcement at junctions also has positive impacts for families, such as:

- Significantly safer junctions, reducing the risk of collisions and creating calmer, more predictable environments for families travelling with children.
- More reliable and consistent traffic behaviour, making everyday journeys, such as school runs, childcare drop-offs, and family errands, less stressful.l
- Encouragement of active travel, as safer junctions can make walking, cycling, and scooting feel more comfortable for families.
- Reduced congestion at busy intersections.

Parents and carers often juggle multiple responsibilities and may be more prone to making quick decisions under pressure. If they have previously relied on prohibited turns for convenience, the introduction of automatic enforcement may increase compliance and improve safety, while at the

same time requiring some drivers to take longer routes, potentially increasing travel time during school runs or care-related journeys.

6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

According to Joint Strategic Needs Assessment (JSNA) a total of 2,099 live births (32 births per 1,000 women aged 15 to 44 years) were recorded in Brighton & Hove in 2022. This is lower than England (52 per 1,000) and the South East (52 per 1,000) and is the lowest of all upper-tier local authorities in England.

Implementing Moving Traffic Enforcement within junctions may lead to various negative and positive impacts, such as the following:

Pregnancy & Maternity

Positive impacts

Safer junctions reduce the risk of collisions for expectant parents and those travelling with infants

Lower vehicle emissions at enforced junctions support respiratory health, which is especially important during pregnancy and early childhood

Calmer, less chaotic road environments can reduce stress and anxiety for new parents when travelling

Negative impacts

Parents and carers often juggle multiple responsibilities and may be more prone to making quick decisions under pressure. If they have previously relied on prohibited turns for convenience, the introduction of automatic enforcement may increase compliance and improve safety, while at the same time requiring some drivers to take longer routes, potentially increasing travel time during school runs or care-related journeys.

Paternity & Adoption

Positive impacts

Safer walking and cycling routes through calmer junctions can encourage bonding time during family journeys.

Enforcement that prioritises predictable, safe movement supports diverse caregiving roles, including adoptive and paternal figures.

Negative impacts

Confusion about new enforcement measures or receiving a Penalty Charge Notice may add pressure to already demanding routines for caregivers.

Menopause

Positive impacts

Cleaner air and reduced heat from idling vehicles can help ease symptoms such as hot flashes and fatigue

Infertility

Positive impacts

Cleaner air and reduced stress from calmer junctions can support general wellbeing, which may be beneficial during fertility treatment periods

Negative impacts

Traffic restrictions may interfere with time-sensitive medical appointments or increase emotional strain if journeys become more complex

Mitigations

To ensure Moving Traffic Enforcement at junctions is inclusive and supportive of these groups, Brighton & Hove City Council will:

Issue 6-month warning notices, giving people time to adjust to the new enforcement measures before full enforcement begins.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Implementing Moving Traffic Enforcement within junctions may lead to various negative and positive impacts, such as the following:

Positive impacts:

Enforcement helps streamline routes, which benefits personnel with tight schedules or shift-based roles.

Less noise and congestion can be beneficial for veterans with PTSD or sensory sensitivities.

Negative Impacts:

Armed Forces families moving into new areas may be unfamiliar with enforcement zones, leading to violations.

Mitigations:

Continue using clear signage.

Issue 6-month warning notices, giving people time to adjust to the new enforcement measures before full enforcement begins.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

According to 2021 Census, one in five residents of Brighton and Hove (54,343 people, 20%) were born outside of the UK. This is a higher proportion than seen in the South East (16%) and England (17%).

Despite the overall number of residents only increasing by 1%, the number of residents born outside of the UK has increased by 27% (11,456 people) since 2011, with the proportion increasing from 16% to 20%.

Implementing Moving Traffic Enforcement within may lead to various negative and positive impacts, such as the following:

Positive impacts:

- Safer junctions improve conditions for children and caregivers travelling through busy areas, which is especially valuable for families unfamiliar with UK driving norms.
- Cleaner air and reduced congestion support physical and mental wellbeing, particularly for those who may already experience stress linked to resettlement or displacement.
- Calmer, more predictable traffic environments can help newcomers feel more confident navigating their neighbourhoods.
- Shared public spaces around safer junctions can support community interaction and help migrants, asylum seekers, and refugees feel more connected and included.

Negative impacts:

- Enforcement signage and rules may be unclear to non-native speakers, increasing the risk of violations or fines.
- Some migrant families may rely heavily on cars due to work patterns, distance, or safety concerns; changes of enforcement measures at junctions may disrupt routines or create logistical challenges.
- Increased enforcement presence may feel intimidating to refugees or asylum seekers who have experienced trauma or distrust of authorities.
- Language barriers may make it difficult to understand enforcement rules or navigate appeals processes.

- Digital exclusion may limit access to online information or guidance.
- Financial penalties may have a disproportionate impact on communities with lower average incomes.
- If migrant, asylum seeker or refugee communities are over-represented in areas near the enforced junctions, they may be more exposed to enforcement. There is also evidence in some contexts that racially minoritised groups may have lower access to driving-related information or support, increasing the risk of contraventions. The key consideration is if signage and written information and supporting communications about the introduction of the automatic enforcement measures are sufficiently clear and accessible to enable all road users to understand and comply with the existing restrictions.
- People for whom English is a second language may be more likely to face additional challenges in understanding existing traffic restrictions, especially if they rely on familiarity with local traffic arrangements or on observing other drivers' behaviour. Currently, widespread non-compliance may give the impression that certain turns are allowed. Once enforcement begins, these individuals may be more likely to receive penalties if they have been following the behaviour of others rather than the signage. However, all drivers are expected to follow the traffic signs and road markings in place, regardless of the actions of others The proposed change relates to the method of enforcement rather than the restrictions themselves. The key consideration is if signage and written information and supporting communications about the introduction of the automatic enforcement measures are sufficiently clear and accessible to enable all road users to understand and comply with the existing restrictions.
- The council is enforcing what is already in place through signage and is a legal requirement to improve road safety.

The potential mitigations for these negative impacts would be the following:

- Ensuring that and communications about the new automatic enforcement measures are available in accessible formats and variety of languages
- Provide information in accessible formats, such as Easy Read when requested
- Using plain English in all communications.
- Include the Parking Projects phone number and email address, if anyone has any questions
- Implementing grace period with warnings before full enforcement begins (6 months' warning notices to allow people to get used to the new measures).
- Ensure clear appeals process is accessible.
- Translate key information into commonly spoken community languages, when requested
- Ensure the appeals process is clearly explained and accessible
- Issue 6-month warning notices to allow communities time to understand and adapt to the new measures

6.12 Carers:

Does your analysis indicate a disproportionate impact relating to Carers (Especially considering for age, ethnicity, language, and various intersections).	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Positive impacts

Reduced traffic volume and speed at junctions lowers the risk of collisions, making travel safer for carers escorting vulnerable individuals.

Safer walking and wheeling routes encourage carers and those they support to use healthier, more sustainable travel modes.

Calmer, more predictable junctions can reduce stress for carers who often manage multiple responsibilities and time-sensitive journeys.

Improved road conditions benefit wheelchair users, people with restricted mobility, and their carers by reducing hazards and creating more accessible crossing points.

Negative impacts

Carers who rely on vehicles to transport individuals with limited mobility may face challenges navigating new junction enforcement measures.

Traffic rerouted from enforced junctions may increase congestion or safety risks on surrounding roads, affecting carers' travel times.

Informal carers, who make up the majority of the caring population, may struggle to understand new enforcement rules without targeted communication.

Carers with access requirements (e.g., visual impairments, neurodivergence) may find it harder to interpret new enforcement measures or navigate appeals processes.

Digital exclusion may limit access to online information or guidance.

Anxiety about penalty notices may add to existing emotional and practical pressures.

Mitigations

Provide additional signage at all enforced junctions.

Include an accessibility statement in communications, explaining how people can request support or alternative formats.

Make information available in accessible formats, such as Easy Read when requested.

Use plain English in all communications.

Include Parking Projects Email and phone number on Moving Traffic Enforcement webpages, si that people can ask questions.

Ensure the appeals process is clearly explained and accessible.

Issue 6-month warning notices to allow carers and the people they support time to understand and adapt to the new measures.

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections). **Also consider our Corporate Parenting Responsibility in connection to your activity.**	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Implementing Moving Traffic Enforcement within junctions may lead to various negative and positive impacts, such as the following:

Negative impacts

- Care-experienced young people who are unfamiliar with the area may find new junction enforcement measures confusing, increasing the risk of violations.
- Unclear signage or inconsistent enforcement may cause anxiety for young people who already face higher levels of stress or reduced confidence.
- Traffic rerouted from enforced junctions may increase congestion on surrounding roads, affecting carers, foster families, and support workers transporting children.
- Young people who are neurodivergent or experience anxiety or have a history of trauma may find changes to road layouts or enforcement presence unsettling.
- Digital exclusion may limit access to online information about new rules.
- Care Leavers, who often have limited financial resources, may be disproportionately affected by penalty charges.
- Young people without strong support networks may struggle to interpret or challenge enforcement decisions.

Mitigations

- Provide additional signage as needed at enforced junctions.
- Make information available in accessible formats, such as Easy Read, when requested.
- Use plain English in all communications.
- Include Parking Projects email and phone number within Moving Traffic Enforcement webcontent, so that people can call and ask questions.
- Ensure the appeals process is clearly explained and accessible.
- Issue 6-month warning notices to allow young people, carers, and support networks time to understand and adapt to the new measures.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Implementing Moving Traffic Enforcement may lead to various negative and positive impacts, such as the following:

Positive impacts:

Safer junctions reduce the risk of collisions for people who walk or move through busy areas, including those who may be sleeping rough or spending long periods outdoors.

Cleaner air and reduced congestion support physical health, particularly for individuals with respiratory conditions or compromised immunity.

Calmer, more predictable traffic environments can reduce stress and anxiety for people who may already be experiencing trauma or instability.

Improved walking routes benefit individuals who rely on walking as their primary mode of travel.

Reduced noise and idling can create a less hostile environment for people sleeping rough near busy junctions.

Negative impacts

- People experiencing homelessness may find new junction restrictions confusing, especially if they have limited access to information.
- Unclear signage or sudden changes may cause anxiety for individuals who already face high levels of stress.
- Increased enforcement presence may feel intimidating, particularly for those who have had negative experiences with authorities.
- Traffic rerouted from enforced junctions may increase noise or congestion in areas where people are sleeping rough or accessing services.
- Digital exclusion may limit access to online information about new rules.
- Individuals with mental health conditions, neurodivergence, or cognitive impairments may struggle to interpret or remember new restrictions.
- People experiencing homelessness may be disproportionately affected by financial penalties, given extremely limited income.

Mitigations

- Provide additional signage as needed at enforced junctions.

- Include Parking Projects email address and number on MTE Junctions Web content, if people have questions.
- Make information available in accessible formats, such as Easy Read when requested.
- Use plain English in all communications.
- Ensure the appeals process is clearly explained and accessible.
- Issue 6-month warning notices to allow individuals and support services time to understand and adapt to the new measures.

6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Implementing Moving Traffic Enforcement may lead to various negative and positive impacts, such as the following:

Positive impacts

- Safer, calmer junctions reduce the risk of collisions and create more predictable environments, which can be reassuring for survivors who may experience anxiety or hypervigilance.
- Cleaner air and reduced congestion support physical and mental wellbeing, particularly for individuals recovering from trauma or managing long-term health impacts.
- More reliable traffic behaviour can make essential journeys, such as travelling to support services, medical appointments, or safe spaces, feel less stressful.
- Improved walking and wheeling routes benefit survivors who rely on public transport, walking, or support workers for travel.
- Reduced noise and idling can help create less triggering environments for individuals sensitive to loud or sudden sounds.

Negative impacts

- Increased enforcement presence may feel intimidating or triggering for individuals with trauma linked to authority figures.
- Traffic rerouted from enforced junctions may increase noise or congestion in areas where survivors live, travel, or access services.

- Survivors with mental health conditions, neurodivergence, or cognitive impairments may struggle to interpret or remember new enforcement measures.
- Digital exclusion may limit access to online information about new rules.
- Financial penalties may have a disproportionate impact, as survivors are statistically more likely to experience economic abuse, debt, or financial instability.
- People in vulnerable situations may have limited support networks, making it harder to navigate appeals or understand enforcement decisions.

Mitigations

- Provide additional signage as needed at enforced junctions.
- Make information available in accessible formats, such as Easy Read when requested.
- Use plain English in all communications.
- Include Parking Projects email and phone number on Moving Traffic Enforcement web content, so that people can ask questions.
- Ensure the appeals process is clearly explained and accessible.
- Issue 6-month warning notices to allow individuals and support services time to understand and adapt to the new measures.

6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Implementing Moving Traffic Enforcement may lead to various negative and positive impacts, such as the following:

Positive impacts

Safer junctions reduce collision risks for people who rely on walking, cycling, or public transport.

More predictable traffic behaviour can make everyday journeys, such as commuting, school runs, or accessing services, less stressful.

Improved walking and wheeling routes benefit individuals who cannot afford a car or rely on active travel.

Reduced noise and idling can improve the living environment in lower-income neighbourhoods, which are often located near busy roads.

Negative impacts

People on low incomes may be disproportionately affected by financial penalties, as even small fines can create significant hardship.

Digital exclusion may limit access to online information about new enforcement, appeals processes, or enforcement boundaries.

Unclear signage or inconsistent enforcement may cause stress for people already managing financial or time pressures.

Traffic rerouted from enforced junctions may increase congestion or noise in lower-income areas, which often border major roads.

People with limited access to private vehicles may rely on lift-sharing or informal transport, which could be affected by new measures.

Mitigations

Provide additional signage as needed at enforced junctions.

Include Parking Projects Email and phone number on Moving Traffic Enforcement Web content, to ensure that people can call or email the team with questions.

Make information available in accessible formats, such as Easy Read when requested.

Use plain English in all communications.

Ensure the appeals process is clearly explained and accessible.

Issue 6-month warning notices to allow individuals and communities time to understand and adapt to the new measures.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	YES

If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Implementing Moving Traffic Enforcement may lead to various negative and positive impacts, such as the following:

Positive impacts
Enforcement can reduce dangerous driving, protecting pedestrians and cyclists, especially in densely populated or disadvantaged areas.

By reducing congestion and emissions, enforcement supports cleaner air and healthier living conditions.

Negative impacts
Fixed fines can disproportionately affect low-income individuals, potentially violating principles of fairness and equality.

Individuals from disadvantaged backgrounds may struggle to appeal fines or understand enforcement procedure.

Mitigations
Implement 6-month warning notices and include accessible information on junctions to help people learn about the new measures.

Include links to Brighton Council Website on how to apply for an appeal.

6.18 Cumulative, multiple intersectional, and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
    - People being housebound due to disabilities or disabling circumstances
    - Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
    - People experiencing homelessness
    - People on a low income and people living in the most deprived areas
    - People facing literacy, numeracy and/or digital barriers
    - Lone parents
    - People with experience of or living with addiction and/ or a substance use disorder (SUD)
    - Sex workers
    - Ex-offenders and people with unrelated convictions
    - People who have experienced female genital mutilation (FGM)
    - People who have experienced human trafficking or modern slavery

People who belong to more than one minoritised or disadvantaged group may experience **compounded, overlapping, or intensified impacts** from Moving Traffic Enforcement at junctions.

Cumulative and intersectional impacts

Individuals who hold multiple identities, such as disabled Gypsy, Roma and Traveller community members, LGBTQIA+ Black and Racially Minoritised people, older disabled trans and

non-binary people, or young autistic people, may face heightened barriers due to the interaction of discrimination, marginalisation, and practical access requirements. For these groups:

- Increased enforcement presence may feel intimidating or triggering for people with a history of trauma, including survivors of abuse, people with experience of the criminal justice system, or those who have faced discrimination from authorities.
- Digital exclusion may limit access to online information about new rules, appeals, or enforcement boundaries.
- Financial penalties may disproportionately affect people on low incomes, lone parents, people experiencing homelessness, or those facing socio-economic disadvantage.
- People who are housebound or rely on carers may be indirectly affected if support workers face delays or confusion navigating new junction enforcement measures.
- People with addiction or substance use disorders (SUD) may experience increased anxiety or reduced ability to navigate complex signage or enforcement rules (for example potential additional signage).
- Sex workers, who often work at night or travel irregular routes, may be disproportionately affected by changes to predictable traffic patterns.
- Ex-offenders or people with unrelated convictions may feel heightened anxiety around enforcement activity due to past experiences with authority.
- People who have experienced female genital mutilation (FGM), human trafficking, or modern slavery may be particularly sensitive to environments that feel controlled, unpredictable, or heavily monitored.

Cumulative and intersectional impacts

Individuals who hold multiple identities - such as disabled Gypsy, Roma and Traveller community members, LGBTQIA+ Black and Racially Minoritised people, older disabled trans and non-binary people, or young autistic people - may face heightened barriers due to the interaction of discrimination, marginalisation, and practical access needs. For these groups:

- Increased enforcement presence may feel intimidating or triggering for people with trauma histories, including survivors of abuse, people with experience of the criminal justice system, or those who have faced discrimination from authorities.
- Digital exclusion may limit access to online information about new rules, appeals, or enforcement boundaries.
- Financial penalties may disproportionately affect people on low incomes, lone parents, people experiencing homelessness, or those facing socio-economic disadvantage.
- Environmental and mobility barriers may compound difficulties for people with sight loss, D/deafness, sensory sensitivities, or complex disabilities.
- People who are housebound or rely on carers may be indirectly affected if support workers face delays or confusion navigating new junction restrictions.
- People with addiction or substance use disorders (SUD) may experience increased anxiety or reduced ability to navigate complex signage or enforcement rules.
- Sex workers, who often work at night or travel irregular routes, may be disproportionately affected by changes to predictable traffic patterns.
- Ex-offenders or people with unrelated convictions may feel heightened anxiety around enforcement activity due to past experiences with authority.

- People who have experienced FGM, human trafficking, or modern slavery may be particularly sensitive to environments that feel controlled, unpredictable, or heavily monitored.

Wider systemic and structural barriers

People living with multiple disadvantages often face **compounded structural inequalities**, including:

- Lower access to private vehicles.
- Higher reliance on walking, public transport, or informal travel arrangements.
- Greater exposure to unsafe or polluted environments.
- Reduced access to information due to literacy, language, or digital barriers.
- Higher levels of stress, trauma, or instability.
- These factors can intensify the impact of any transport-related change, including MTE at junctions.

Overall assessment

While Moving Traffic Enforcement at junctions can bring significant safety benefits, intersectional groups may experience greater challenges in understanding, adapting to, or navigating the changes. These cumulative impacts highlight the need for:

- Include Parking Projects email and phone number on Moving Traffic Enforcement Junctions web content, so that people can ask questions.
- Visual and Easy Read materials when requested.
- Trauma-informed approaches to enforcement.
- Engagement with community organisations supporting minoritised and vulnerable groups.
- Sufficient adjustment periods, such as warning notices.
- Accessible routes for feedback and appeals.
- To alleviate people's surveillance anxiety, we will make it clear to the public that the camera enforcement system will capture the details of vehicles contravening the restrictions, but no other data will be retained and that our enforcement priority will be solely on the road restrictions.
- Privacy masks, to obscure specific areas can also be situated over any nearby properties when requested by residents.
- This ensures that the benefits of safer, calmer junctions are realised without deepening existing inequalities.

7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to

add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

SMART Action 1: Ensure that introduction of Moving Traffic Enforcement (MTE) at junctions is clear, timely, and accessible

Activities:

To support all residents, particularly those with access requirements, language barriers, or limited digital skills, Brighton & Hove City Council will:

Identify any disproportionate impacts and barriers to access experienced by residents and road users in relation to the introduction of automatic enforcement measures, focusing on whether information, signage and supporting communications are sufficiently clear, accessible and inclusive to ensure that all road users have an equal opportunity to understand and comply with the existing traffic restrictions, which apply to all drivers.

- Ensure that information and communications about the new automatic enforcement measures are available in accessible formats such as for example large print, Easy Read or British Sign Language (BSL) and variety of languages when requested.
- Use plain English in all communications.
- Include Parking Projects email and phone number on Moving Traffic Enforcement Junctions web pages so that people can call and ask questions.
- Translate key information and materials into community languages when requested.
- Implement a grace period with warning notices before full enforcement begins.
- Ensure the PCN appeals process is clearly explained, accessible, and easy to navigate.

These actions ensure that residents understand the changes at junctions and can adapt without unnecessary stress or disadvantage.

SMART Action 2: Monitor the impact of Moving Traffic Enforcement at junctions

Activities

To ensure the scheme is fair, inclusive, and responsive to community needs, Brighton & Hove City Council will:

- Track feedback, complaints, and appeals related to MTE at junctions by protected characteristic (where disclosed) to identify underrepresented or disadvantaged groups.
- Analyse complaints and concerns to identify systemic barriers or recurring issues.
- Roll out MTE at junctions incrementally to allow Brighton and Hove residents and businesses to get used to the new measures put in place and the council to review impacts, identify barriers, and adjust communications and support to ensure equitable access for all groups.

This monitoring will help the council identify and address any unintended negative impacts of the new enforcement measures on protected or vulnerable groups.

SMART Action 3: Introduce a warning period

Implement a six-month warning period during which drivers receive warning notices rather than penalties.

Use this period to help residents understand the new junction enforcement measures and adapt their travel behaviour.

Review feedback and data collected during the warning period to refine communications, signage, and support.

This approach ensures residents have adequate time to adjust before enforcement begins.

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

- Team Plan
- Project Plan relating to this EIA
- A post implementation survey will not be taking place.

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	**X**
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	

If your decision is to "Proceed with caution", please provide a reasoning for this:

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

10. Directorate and Service Approval

Signatory:	**Name and Job Title:**	**Date:** DD-MMM-YY
Responsible Lead Officer:	Tamara Farragher Parking Projects Officer	5th October 2026
Accountable Manager:	Peter Turner Senior Parking Projects Team Manager	12th October 2026

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, Equalities inbox, any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing. Budget and Staffing EIAs secure EDI Manager and Head of Service level approval via different templates.

Signatory:	**Name:**	**Date:** DD-MMM-YY
EDI Business Partner:	Zofia Danin	1-Oct-26
EDI Manager:		

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment:

Notes and recommendations (if any) from Head of CETS Service reviewing this assessment: