

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

Appendix 2 - GM CAP EQIA following consultation - Evidence report - Salford assessment

Salford City Council

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1 Local Authority EqlA Appendix

1.1 Introduction

An Equality Impact Assessment (EqlA) has been developed at a Greater Manchester (GM) scale for the GM Clean Air Plan (GM CAP) in line with the public sector equality duty in section 149 of the Equality Act 2010.

The GM wide assessment builds on EqlAs that were published at the Outline Business Case stage in 2019 and the EqlA developed to support the consultation in late 2020. It considers the impacts on protected characteristics related to the implementation of CAZ C charging zone in GM and how implementation of the proposed package of mitigation measures addresses any identified equality impacts. This EqlA is an update following changes to the GM CAP policy made in consideration of feedback received during the consultation.

The EqlA is supported by an Equality Impact Evidence Report, appended to the EqlA¹.

1.2 Local Authority Assessment

This appendix to the GM EqlA includes an assessment of equality carried out by Salford City Council. The reasons for individual LA assessments include:

- To fulfil legal requirements placed on LAs to meet their duty under the Equality Act;
- To ensure that each of the LAs has considered and understood the full GM EqlA report and the context for the LA itself;
- To identify any LA baseline profile nuances or differences to that presented in the GM EqlA (Appendix A in the Equality Impact Evidence Report).
- To review the assessment outcomes of the GM EqlA and identify whether impacts would be more or less significant within the LA areas;
- To highlight any geographical 'hot spots' with LA areas;
- To identify any actions LAs could take to mitigate and monitor equality impacts identified (specific to the LA area rather than applicable across GM as a whole).

1.3 Salford Council Approach to Equality Impact

Salford City Council uses equality impact assessments (called Community Impact Assessment or CIA) to ensure that policy, strategy and service design are conducted in a way that complies with the requirements of the Public Sector Equality Duty and also ensures that there are fair outcomes

¹ <https://cleanairgm.com/technical-documents/>

for the residents of the city. Our CIA process is aligned with our Equality Objectives and is fundamental to our second objective: “To better understand, and respond to, the needs of Salford’s diverse communities”.

In addition to the consideration of people sharing the nine protected characteristics listed in the Equality Act, 2010, Salford considers Veterans, carers, homeless people and Gypsies and Travellers. We are moving to formal inclusion of the socioeconomic duty, and currently do this informally.

Our approach to equality can be seen here:

<https://www.salford.gov.uk/your-council/corporate-information/equality-and-cohesion/> We are in the process of finalising an Equality Strategy for Salford, which highlights the use of our CIA process as part of equality assurance.

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2 Salford Council EqIA

2.1 Baseline data review

2.1.1 Introduction

We have used the data collated in our recent ward profiles (March 2021), which capture the characteristics in the city to inform this assessment.

2.1.2 Baseline data

In- Scope Protected Characteristic	Overview for the local authority; including updated data including any significant variation to the GM picture.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic to highlight an distributional impacts)
Age	<p>Salford as a whole has experienced population growth over the past decades and this is forecast to continue. This reflects new economic opportunities in the city, respectively lower rents, and the placement of asylum seekers in the city.</p>	<p>Boothstown and Ellenbrook ward (in the west of the city) has a higher proportion of older residents. Kersal and Broughton Park has a high proportion of under 16's. The area around the University (Blackfriars and Trinity) has a higher proportion of 20-35 year olds. There is a similar demographic of 20-35 year olds in Ordsall with an even more marked pattern in Quays, reflecting the nature of housing and proximity to the centre of Manchester and employment in the area.</p>
Disability	<p>Respiratory disease, the third biggest killer of Salford residents, has fallen by around a fifth (21%) between 2002 and 2019.</p> <p>Selected mortality indicators from the Public Health Profiles presenting Salford compared to England and regional values. Data extracted May 2021 Under 75 mortality rate from respiratory disease was worse than both the England and the North-West values. The Salford value was fifth highest in the North-West for 2017-19.</p> <p>2021 Salford School Census 7,697 children and young people aged 0 to 19 years with SEND in Salford</p> <p>51.9% of children with EHC plans in Salford are educated in mainstream schools. This is similar to the England</p>	<p>In 2017-19, mortality rates from respiratory disease were three times higher in the 10% most deprived areas of Salford compared with the 10% least deprived areas (local decile of deprivation)</p> <p>Rates of SEN need are highest in the most deprived areas of Salford. The 10% most deprived areas of Salford have SEN rates of 24.5% whilst the 10-20% most deprived areas have rates of 23.1%. This compares to rates of 10.6% and 10.3% in the 10-20% and 10% least deprived areas respectively.</p> <p>The wards of Irlam (27.2%), Broughton (25.8%) and Little Hulton (25.4%) have the highest rates. Broughton and Little Hulton are the second and third most deprived wards in Salford.</p>

In- Scope Protected Characteristic	Overview for the local authority; including updated data including any significant variation to the GM picture.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic to highlight an distributional impacts)
	average, but higher than the North-West average and our statistical neighbours.	
Pregnancy and Maternity	<p>Over the last 5 years fertility rates have fallen in Salford from a rate of 67.8 per 1,000 women in 2015 to 63.3 per 1,000 women in 2019. In 2019 there were 3,532 live births. The fertility rate in Salford remains higher than national and regional averages though.</p> <p>Infant mortality rates rose through 2004-06 to a high in 2008-10 of 6.0 per 1,000 live births but then declined up to 2012-14. Since 2012-14 rates have risen and levelled off but were not as high as the 2004-06 to 2008-10 period. In 2017-19 the infant mortality rate was 4.6 per 1,000 live births. Rates have not significantly changed throughout the entire period (2004-06 to 2017-19).</p>	<p>There is a clear deprivation profile in infant mortality, with the 20% least deprived areas consistently significantly lower than the Salford average. (local quintiles of deprivation)</p> <p>The crude rate of infant mortality per 1,000 live births range from 6.4 in the most deprived quintile to 2.5 in the least deprived quintile in the 10 year pooled figures of 2010 to 2019.</p>
Race	<p>Salford is increasingly diverse in terms of ethnicity and recent figures are that the city is 89% White. There has been a longstanding section of the Manchester Jewish community resident in Salford, and a Yemeni (Arab) community established in Eccles in the 1940's/50's, with some diversity around the University. Changes between the 2001 and 2011 census were marked and more recent data contained with ward profiles indicates further change. In particular, Salford has a high percentage of Black African people, compared to most of GM (other than Manchester). These residents live mainly in the east of the city.</p>	<p>East Salford is the most ethnically diverse in the city, with one ward, Blackfriars & Trinity having 62% white British people. Eccles is also diverse. These areas have populations of Black African, Asian, Yemeni Arab and Jewish people. The west of the City wards are 90% or higher White British.</p> <p>Compared to GM, particularly Bolton, Rochdale and Oldham, Salford does not have large Pakistani or Bangladeshi communities.</p>
Sex	No great dissimilarity to GM identified	
Religion / Belief	Salford has a higher proportion of Jewish residents than most of GM, with 4% residents identifying as Jewish.	Salford's Jewish communities are concentrated in the Kersal & Broughton Park and Broughton wards.

In- Scope Protected Characteristic	Overview for the local authority; including updated data including any significant variation to the GM picture.	'Outliers' within the Local Authority (LSOAs or communities with a particularly high proportion of a protected characteristic to highlight an distributional impacts)
	<p>Salford has a long-established Yemeni Muslim community and a small South Asian population. Newer groups of Iranians, Somalis.</p> <p>The religious profile of the city is thus different to that of GM as a whole – both due to the Jewish communities and because our Muslim population is of a different ethnic character.</p> <p>Although the percentage of the population of Pakistani and Bangladeshi origin is low compared to GM as a whole, these groups are disproportionately represented in the taxi driving occupation.</p>	<p>Yemeni and South Asian Muslims are concentrated in Eccles, with newer groups, including Somali and Iranian Muslims at higher density in Broughton and Pendleton & Charlestown in the east of the city.</p>
Gender reassignment/ Gender identity	<p>There is a lack of reliable data for people with this characteristic. However, Salford is in close proximity to Manchester's Gay Village and has historically had lower rents. We believe this to mean that we are likely to have a higher percentage of people who are trans or non-binary than the national average.</p>	<p>Our understanding is that there is a higher concentration of people sharing this characteristic in the east of the city.</p>
Sexual orientation	<p>Indications that Salford has a higher proportion of Lesbian, Gay, Bisexual people than the national average, as scoped in our LGBT+ Health Needs Assessment (2015).</p>	<p>Concentration denser in the east of the city. This was indicated in our Needs Assessment by the distribution of those in civil partnerships, then only available to same sex couples.</p>

2.1.3 Socio-Economic Characteristics

Under the Equality Act, socio-economic characteristic is not a Protected Characteristic. As a result, the GM EqIA for CAP does not consider the impacts on the scheme on difference socio-economic groups. A Distributional Impact Assessment (DIA) has been undertaken for the programme which does consider these impacts.

Salford considers the differential impact on people of low socioeconomic status in our CIAs. Within the city there are contrasts. City Centre Salford, Salford Quays, and some adjoining areas have experienced significant growth and investment in recent years and provide a major concentration of employment, retail, leisure, tourism and cultural opportunities. However, some of the inner neighbourhoods surrounding the City Centre are characterised by high levels of deprivation and contribute towards Salford being identified as the 19th most deprived local authority in England. The rest of the city is generally much more suburban in character. It includes some of Greater Manchester's most affluent residential areas such as Worsley, Boothstown and Ellesmere Park.

Salford's areas of high deprivation are also the places which have a greater mix of ethnicities and religions (characteristics which have a correlation). The wards in the east of the city are also the areas with higher numbers of LGB and Trans people. All of these groups are known to experience higher rates of unemployment and more precarious employment.

Per capita carbon emissions in Salford have reduced significantly over recent years, from 8.4 tonnes in 2005 to 5.0 tonnes in 2017. However, Salford has the second highest per capita emissions of the ten Greater Manchester districts, primarily due to the impacts of traffic on the motorways and A roads across the city. Motorway emissions are out of scope for the GM CAP, but around the Eccles motorway interchange and the Clifton area cause higher concentrations of CO₂.

As the improvement of air quality is generally expected to be greatest for those in the areas of highest deprivation, the success of Manchester's Clean Air Plan should result in a positive disproportionate impact.

2.1.4 Equality impacts review

The following table summarises the equality impact assessment for the scoped-in characteristics for Salford in relation to the GM assessment described in the full GM CAP EqIA.

Protected characteristic	Assessment topic	Impact (+/-)	GM	Salford	Differential/ Disproportionate	Reason for difference in impact from GM assessment
			Magnitude of impact post mitigation (extent of population exposure to impact)			
Age	Air quality	+	High	High	Differential	No impact different from that of the GM Assessment identified
	Accessibility	-	Low	Low	Disproportionate	No impact different from that of the GM Assessment identified
	Affordability	-	Low	Low	Disproportionate	No impact different from that of the GM Assessment identified
Disability ²	Air quality	+	High	High	Differential	No impact different from that of the GM Assessment identified
	Accessibility	-	Low	Low	Disproportionate	No impact different from that of the GM Assessment identified
	Affordability	-	Low	Low	Disproportionate	No impact different from that of the GM Assessment identified
Pregnancy and maternity	Air quality	+	High	High	Differential	No impact different from that of the GM Assessment identified
	Accessibility	No equality impact				
	Affordability	No equality impact				

² Disability covers a wide range of physical and mental impairment. Where the impact would differ dependent on disability this is flagged in the narrative.

Protected characteristic	Assessment topic	Impact (+/-)	GM	Salford	Differential/ Disproportionate	Reason for difference in impact from GM assessment
			Magnitude of impact post mitigation (extent of population exposure to impact)			
Race ³	Air quality	+	High	High	Disproportionate	No impact different from that of the GM Assessment identified
	Accessibility	-	Low	Low	Disproportionate	As noted above, Salford's ethnic minority groups differ from those in GM, with a higher Yemeni Arab population and smaller groups of Pakistani and Bangladeshi heritage / British Pakistani and British Bangladeshi. However, the taxi workforce includes a high proportion of Pakistani and Bangladeshi and Yemeni individuals, principally men. Salford has a higher than national average of Gypsies and Irish Travellers who disproportionately depend on microbusiness with a vehicle. Members of this group are often digitally excluded and may not access the support to access funds without specific outreach.
	Affordability	-	Low	Low	Disproportionate	
Religion	Air Quality	+	High	High	Disproportionate	No impact different from that of the GM Assessment identified
	Accessibility	-	Low	Low	Disproportionate	No impact different from that of the GM Assessment identified
	Affordability	-	Low	Low	Disproportionate	<i>Salford Jewish community has a number of microbusinesses who may struggle to replace vehicles. Many of these businesses serve the community so increased costs would be borne by the community and business closures would impact. Members of this community are likely to</i>

³ Race covers all races identified within the ONS dataset. Where the impact would differ for different races, this is identified in the narrative.

Protected characteristic	Assessment topic	Impact (+/-)	GM	Salford	Differential/ Disproportionate	Reason for difference in impact from GM assessment
			Magnitude of impact post mitigation (extent of population exposure to impact)			
						<i>be digitally excluded and may not be easily reached with information about the funds without specific outreach.</i>
Sex	Air quality	No equality impact				
	Accessibility	No equality impact				
	Affordability	-	Medium	Medium	Disproportionate	Taxi drivers, PHV drivers and bus drivers are over 90% more likely to be male than female. Any business costs are therefore likely to be disproportionately experienced by men.
Gender reassignment / Gender identity	Air quality	No equality impact				
	Accessibility		Low	Low	Differential	No impact different from that of the GM Assessment identified
	Affordability	-	Low	Low	Differential	<i>Many Salford Trans and nonbinary residents access the Manchester Village night-time economy. Due to hate crime concerns they may be reliant on PH / taxis and any increase in costs would have a negative impact.</i>

Protected characteristic	Assessment topic	Impact (+/-)	GM	Salford	Differential/ Disproportionate	Reason for difference in impact from GM assessment
			Magnitude of impact post mitigation (extent of population exposure to impact)			
Sexual orientation	Air quality	No equality impact				
	Affordability	-	Low	Low	Differential	Indications are that Salford has a higher percentage than most of GM, and, there could be a disproportionate impact of affordability and accessibility due to the patterns of use of taxis and PHVs to access Manchester Gay Village, historic lower earning in these groups, and therefore lack of cars, with fear of hate crime a factor in avoiding public transport.
	Accessibility	-	Low	Low	Differential	

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2.2 'Hot-spots' in your Salford:

2.2.1 Geographical 'hot-spots' in Salford

Salford has several hotspot areas. Some hotspots for carbon concentration relate to the motorway network, which is out of scope for the Clean Air Plan. The Eccles motorway interchange maps to one of our diverse neighbourhoods, whereas the Clifton interchange area is in a less diverse neighbourhood.

There is geographical concentration of residents who share one of the protected characteristics noted below so there is overlap between geographical and protected characteristic hotspots.

2.2.2 Protected characteristic 'hot-spots' in Salford

As noted in the table above, Salford has a disproportionate part of the GM Jewish population. There are a higher than the national average percentage of Gypsies and Irish Travellers in Salford, both on sites and in bricks and mortar. Both these communities have a high number of microbusinesses with a van. Both are less likely than the average to be reached by digital communications. Both communities have a long-standing tendency to live somewhat separately from other groups. Some Jewish residents will lack English and some Irish Travellers and Gypsies will lack literacy skills. Both groups are likely to be among the digitally excluded. These groups are disproportionately resident in East Salford, so the geography and protected characteristics intersect.

Eccles ward is another part of the city with high mix of ethnicities, including many of our Yemeni Arab, Pakistani / British Pakistani and Bangladeshi / British Bangladeshi residents, who are disproportionately represented in the taxi and PHV driver occupational group.

Salford also has an estimated higher proportion of lesbian, gay and bisexual residents than other authorities besides Manchester. Many members of this group will travel to Manchester's Gay Village and, due to the higher likelihood of experiencing incidents of hate crime and hate speech, are likely to use PHVs and taxis. Any increase in costs could disproportionately impact. It is known that members of this group may have lower earnings due to homo/bi phobia. There is also a higher incidence of poor mental health due to the impacts of institutional homo / bi phobia. Raising the costs of accessing 'queer-friendly' spaces could have a negative impact. The percentage of LGB and T people appears to be higher in the wards to the east of the city.

2.3 Actions to be taken by Salford

Salford will put into place the following:

2.3.1 Mitigate any potential equality impacts identified.

- Ensure information about the Clean Air Plan and various funds is made available to the Jewish community through the Jewish Forum and in partnership with local contacts. This may involve translations.
- Ensure the same for Irish Travellers through Salford's Homelessness team and the Duchy Partnership
- Support both of the above groups to access funds for replacement or retrofit of their vehicles. This may include reaching out through established relationships.
- Ensure any caravan and horse clubs within the city are aware of the charges and inform their members
- Share all GM comms that explain the substantial health benefits to the population from the CAP. Ensure these are in a language and format (including BSL) that can be understood by all sections of the population and communicated via trusted channels.
- Ensure Salford Neighbourhood Committees forward information and collect community feedback on the changes.

2.3.2 Monitor any potential equality impacts identified.

Local monitoring will consider collecting information to enable:

- Uptake in funding schemes by businesses or individuals in different lower super output areas to enable comparison by IMD, and to target information to enable equitable uptake
- Uptake of funding schemes by businesses managed by minority ethnic groups, (including Jewish) or individuals

Salford will also delegate a representative to meet with the Monitoring and Evaluation team from GM CAP approximately every 6 months to review data and input any local insight on impacts. It is expected that this could allow modification to the communication strategies.

2.3.3 Review any potential equality impacts identified.

The Council will monitor the impacts of the Clean Air Plan reported by the public and agencies working with identified occupational groups and groups of people sharing protected characteristics. This will change our approach to how the plan is supported and managed in Salford. We will

feed these back to the GM group to ensure insights are shared. Insights for other authority areas will be considered as to whether they pertain to Salford.

2.3.4 Outline local monitoring and review plan.

In the first six months, there will be a monthly review of the uptake of the funds, as it is expected that the monies will be drawn upon as they become available and this will allow for timely outreach to groups who are not accessing the fund or responding to the changed requirements.

Following this, there will be a review at the end of 12 months, in order to feed lessons learned into the GM CAP group.

Uptake of funds will be considered by geographic area, to see if there are differential impacts. There will also be analysis by ethnic identity / religious background, particularly of microbusinesses who are applying to the funds.

Any targeted communications which vary from the GM standard will be assessed informally through neighbourhood partnerships.