

# Equality Impact Assessment

EIA FORM

CITY OF LONDON

**Appendix 5 - Equality Impact Assessment Form**

<b>Directorate:</b> Environment <b>Service Area:</b> Air Quality	<b>Lead Officer:</b> Ruth Calderwood <b>Date completed:</b> 01/7/2024
<b>Service / Function / Policy / Procedure to be assessed:</b> City Corporation Air Quality Strategy 2025 to 2030	
<b>Is this:</b> New / Proposed <input checked="" type="checkbox"/> Existing/Review <input type="checkbox"/> Changing <input type="checkbox"/>  (Please tick appropriate box)	<b>Review date:</b> annually, 2025 to 2030 in line with the strategy

### Part A – Initial Equality Impact Assessment to determine if a full Equality Impact Assessment is required.

#### What are the aims and objectives/purpose of this service, function, policy or procedure?

As part of its statutory duties for Air Quality Management, the City of London Corporation is required to measure air quality and, if concentrations are higher than set standards, develop, and implement an action plan to bring levels of pollution down.

The City Corporation has had an air quality action plan in place since 2002. In 2011, the action plan was incorporated into an Air Quality Strategy. The current strategy is for the period 2019 to 2024. This draft strategy covers 2025 to 2030 and includes new data, new targets, and new responsibilities for helping to reduce emissions of very fine particles (PM<sub>2.5</sub>).

The aims of the new strategy are to go beyond our statutory obligations and work towards achieving air quality guidelines that have been set by the World Health Organisation. These are tighter than the national standards so this approach will have a positive impact on the health of all of our communities

#### Please indicate its relevance to any of the equality duties (below) by selecting Yes or No?

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment	x	
Advancing equality of opportunity		x
Fostering good community relations		x

**If not relevant to any of the three equality duties and this is agreed by your Head of Service, the Equality Impact Assessment is now complete - please send a copy to the Equality Team. If any of the three equality duties are relevant, a Full EIA will need to be undertaken (PART B below).**

**PART B: Full Equality Impact Assessment.**

**Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)**

<b>What outcomes are sought and for whom?</b>	Improved air quality for all communities. Air quality that is better than that set by national standards and instead complies with the latest guidelines from the World Health Organisation.
<b>Are there any associated policies, functions, services or procedures?</b>	The strategy is supported by the Corporate Plan, Transport Strategy, Climate Action Strategy, Procurement Strategy, City Plan, Clean City Awards and Considerate Contractors Award
<b>If partners (including external partners) are involved in delivering the service, who are they?</b>	Internal: Climate Action, Transport Policy, Highways, Recycling, Procurement, Planning, Public Health. External: Residents, workers, schools and nurseries, businesses and Business Improvement Districts, North-East London NHS Trust and Barts Health NHS, the Greater London Authority, Transport for London, London Councils, London Boroughs, the UK Government, the Environment Agency, London’s Universities, Charities, Port of London Authority, Cross River Partnership

**Step 2 – What does the information you have collected, or that you have available, tell you?**

**What evidence/data already exists about the service and its users?** (in terms of its impact on the ‘equality strands’, i.e. race, disability, gender, gender re-assignment, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

## Equality Impact Assessment

Publicly available data is used by the City Corporation to provide an understanding of the demographics and protected characteristics of the communities impacted by the draft Air Quality Strategy. The following section gives a summary of the 2021 Census by protected characteristics.

The analysis in this summary has informed the overall development of the work involved in delivering the strategy, and the planning of external engagement with residents, workers, visitors, and service users.

### Population

According to the 2021 Census, the City of London has a population of 8,600 residents (to the nearest 100), an increase of 16.4% from 7,400 in the 2011 Census. This population growth, whilst small in numeric size, is significantly higher as a percentage increase than the 7.7% increase across London and 6.6% increase across England.

### Age

The median age of residents was recorded in the 2021 Census as 37 years, down from 39 in 2011. The aged 20 to 24 years bracket saw the largest increase (3.8 percentage points), unlike the London and national trends, which all saw decreases. The aged 35 to 49 years bracket saw the largest decrease (-3.5 percentage points), in line with the national trends, but opposed to London, which saw a small increase. The below table shows the full percentage breakdown.

Area name	Aged 4 years and under		Aged 5 to 9 years		Aged 10 to 15 years		Aged 16 to 19 years		Aged 20 to 24 years		Aged 25 to 34 years		Aged 35 to 49 years		Aged 50 to 64 years		Aged 65 to 74 years		Aged 75 to 84 years		Aged 85 years and over	
	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021
City of London	3.2	2.5	2.5	1.9	2.7	2.4	2.2	2.2	7.4	11.2	24.1	25.8	24.7	21.2	19.1	18.8	8.0	8.3	4.5	4.3	1.6	1.4

## Equality Impact Assessment

<b>London</b>	7.2	6.0	5.9	6.0	6.7	7.2	4.6	4.4	7.7	6.7	19.9	18.1	22.4	22.7	14.4	16.9	5.8	6.5	3.8	3.8	1.5	1.6
<b>England</b>	6.3	5.4	5.6	5.9	7.0	7.2	5.1	4.6	6.8	6.0	13.5	13.6	21.3	19.4	18.1	19.4	8.6	9.8	5.5	6.1	2.2	2.4
<b>England and Wales</b>	6.2	5.4	5.6	5.9	7.0	7.2	5.1	4.6	6.8	6.0	13.4	13.5	21.3	19.3	18.1	19.5	8.7	9.9	5.6	6.2	2.2	2.4

### Disability

The percentage of non-disabled residents of the City of London increased slightly between 2011 and 2021 and is higher than London and national levels. The ONS advises that responses may have been affected by perceived health status and activity limitations during the COVID-19 pandemic, as well as advising caution when making comparisons between 2011 and 2021, as the question wording and response options were changed. The below table shows the full percentage breakdown.

Area name	Disabled under the Equality Act: Day-to-day activities limited a lot		Disabled under the Equality Act: Day-to-day activities limited a little		Not disabled under the Equality Act	
	2011	2021	2011	2021	2011	2021
<b>City of London</b>	5.6	3.9	8.2	7.9	86.3	88.2
<b>London</b>	9.4	7.1	9.8	8.5	80.8	84.3
<b>England</b>	9.1	7.5	10.2	10.2	80.7	82.3
<b>England and Wales</b>	9.3	7.6	10.2	10.2	80.5	82.2

### Sex

The City of London has fewer female residents than male, by a factor of ten percentage points, though the proportion of female residents did increase by half a percentage point between 2011 and 2021. This is contrary to wider London and national trends. London saw a slightly higher percentage point shift towards the female population between 2011 and 2021, retaining a higher

## Equality Impact Assessment

proportion of female residents. The national breakdown also shows a higher proportion of females, but with a more limited increased between census years. The below table shows the full percentage breakdown.

Area name	Female		Male	
	2011	2021	2011	2021
City of London	44.5	45.0	55.5	55.0
London	50.7	51.5	49.3	48.5
England	50.8	51.0	49.2	49.0
England and Wales	50.8	51.0	49.2	49.0

### Race

The City of London saw a decrease in its White residential population of 9.2 percentage points between 2011 and 2021, with concomitant rises in its Asian, Asian British or Asian Welsh, Mixed or Multiple ethnic groups, and Other ethnic group populations. These changes were larger than those at a London and national level, but in line with overall trends.

The City of London shows higher levels of non-White ethnic groups than the national breakdown, but below those seen for London overall, particularly the Black, Black British, Black Welsh, Caribbean, or African population, where the proportion is 10.8 percentage points lower than London. The below table shows the full percentage breakdown.

Area name	Asian, Asian British or Asian Welsh		Black, Black British, Black Welsh, Caribbean or African		Mixed or Multiple ethnic groups		White		Other ethnic group	
	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021
City of London	12.7	16.8	2.6	2.7	3.9	5.5	78.6	69.4	2.1	5.6
London	18.5	20.7	13.3	13.5	5.0	5.7	59.8	53.8	3.4	6.3
England	7.8	9.6	3.5	4.2	2.3	3.0	85.4	81.0	1.0	2.2
England and Wales	7.5	9.3	3.3	4.0	2.2	2.9	86.0	81.7	1.0	2.1

## Religion or Belief

In the 2021 Census, the most common response from City of London residents was No Religion, at 43.8%, an increase of 9.6 percentage points from 2011. The most common response in 2011 was Christian, which saw a concomitant fall of 10.6 percentage points in 2021. This is in line with national trends, though the decrease was smaller than the overall national trend (13.1 percentage points), but higher than London (8 percentage points). Unlike the City of London, Christian remained the largest response group nationally and in London. However, the ONS advises caution when making comparisons between years and areas when looking at religion as the question is voluntary and has varying response rates. The below table shows the full percentage breakdown.

Area name	No religion		Christian		Buddhist		Hindu		Jewish		Muslim		Sikh		Other religion		Not answered	
	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021
City of London	34.2	43.8	45.3	34.7	1.2	1.1	2.0	2.4	2.3	2.1	5.5	6.3	0.2	0.1	0.4	0.6	8.8	8.9
London	21.0	27.1	48.7	40.7	1.0	0.9	5.0	5.1	1.8	1.7	12.6	15.0	1.5	1.6	0.6	1.0	7.7	7.0
England	24.8	36.7	59.4	46.3	0.5	0.5	1.5	1.8	0.5	0.5	5.0	6.7	0.8	0.9	0.4	0.6	7.1	6.0
England and Wales	25.2	37.2	59.3	46.2	0.4	0.5	1.5	1.7	0.5	0.5	4.9	6.5	0.8	0.9	0.4	0.6	7.1	6.0

## Gender Reassignment

The 2021 Census did not collect any data with respect to Gender Reassignment. Instead, it featured for the first time a question on Gender Identity. The question was voluntary and was only asked of people aged 16 years and over. The City of London broadly follows the national trend. The percentage breakdown for 2021 is displayed below, but with no comparable data for 2011.

Area name	Gender identity the same as sex registered at birth	Gender identity different from sex registered at birth but no specific identity given	Trans woman	Trans man	Non-binary	All other gender identities	Not answered
	2021	2021	2021	2021	2021	2021	2021
City of London	92.1	0.1	0.1	0.1	0.1	0.0	7.4
London	91.2	0.5	0.2	0.2	0.1	0.0	7.9
England	93.5	0.2	0.1	0.1	0.1	0.0	6.0



## Equality Impact Assessment

England and Wales	93.5	0.2	0.1	0.1	0.1	0.0	6.0
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### Pregnancy and Maternity

The 2021 Census did not collect any data with respect to Pregnancy and Maternity. Whilst NHS England does produce annual data on maternity, including the number of births, this data is categorised by Commissioning Region and NHS Foundation Trust, rather than local authority, so will not provide specific data on City of London residents.

As an alternative, NHS England is now producing experimental data on maternity as part of the Maternity Services Dashboard, which can provide us with some of the relevant information - [Maternity Services Monthly Statistics, Final July 2023, Provisional August 2023, experimental statistics - NHS Digital](#) . The most recently published confirmed dataset breaks down the number of women booking antenatal appointments in July 2023. Antenatal appointment bookings by City of London residents were evenly split between the three age categories between 30 and 44. Whilst the proportion of women aged 30 to 34 is in line with London and national trends, women aged 35 to 39 and 40 to 44 are overrepresented, with the latter 26.7 percentage points higher than the London value. However, as the sample size is very small, we should treat these findings with caution.

Area name	Age of Women with an Antenatal Booking Appointment - July 2023							Value Outside Report Parameters
	Under 20	20 to 24	25 to 29	30 to 34	35 to 39	40 to 44	45 or over	
City of London	0.0	0.0	0.0	33.3	33.3	33.3	0.0	0.0
London	1.5	9.8	22.7	34.0	24.8	6.6	0.7	0.0
England	3.2	12.6	26.7	33.5	19.1	4.5	0.4	0.0

### Sexual Orientation

The 2021 Census featured for the first time a question on Sexual Orientation. The question was voluntary and was only asked of people aged 16 years and over. 7.6% of City of London residents identify as Gay or Lesbian, a much higher percentage than seen in London and nationally (5.4 and 6.1 percentage points respectively). A higher percentage also identified as Bisexual, with a resultant lower proportion identifying as Straight or Heterosexual. The percentage breakdown for 2021 is displayed below, but with no comparable data for 2011.

## Equality Impact Assessment

Area name	Straight or Heterosexual	Gay or Lesbian	Bisexual	Pansexual	Asexual	Queer	All other sexual orientations	Not answered
	2021	2021	2021	2021	2021	2021	2021	2021
City of London	79.3	7.6	2.3	0.3	0.1	0.1	0.0	10.4
London	86.2	2.2	1.5	0.4	0.0	0.1	0.0	9.5
England	89.4	1.5	1.3	0.2	0.1	0.0	0.0	7.5
England and Wales	89.4	1.5	1.3	0.2	0.1	0.0	0.0	7.5

### Marriage and Civil Partnership

According to ONS analysis, the City of London saw England's third largest percentage point rise in the proportion of people aged 16 years and over who had never been married or in a civil partnership (from 50.8% in 2011 to 57.4% in 2021). The City of London is now the English local authority area with the sixth-highest percentage of adults who had never been married or in a civil partnership. The City of London is in line with wider London with Never married and never registered a civil partnership as the most common response, compared to nationally where Married or in a registered civil partnership remains the most common response, despite falling between census years. The below table shows the full percentage breakdown.

Area name	Never married and never registered a civil partnership		Married or in a registered civil partnership		Separated, but still legally married or still legally in a civil partnership		Divorced or civil partnership dissolved		Widowed or surviving civil partnership partner	
	2011	2021	2011	2021	2011	2021	2011	2021	2011	2021
City of London	50.8	57.4	34.8	30.4	2.6	2.1	7.8	7.0	4.0	3.0
London	44.1	46.2	40.2	40.0	3.2	2.3	7.4	7.3	5.0	4.2
England	34.6	37.9	46.8	44.7	2.7	2.2	9.0	9.1	6.9	6.1
England and Wales	34.6	37.9	46.8	44.6	2.6	2.2	9.0	9.1	7.0	6.1

### **Health**

Health: 56.6% of City of London residents described their health as "very good", increasing from 55.0% in 2011. Those describing their health as "good" rose from 31.1% to 31.2%.

### **Workers:**

The working population of the City is approximately 615,000 people. The City Statistics Briefing, produced annually by the City Corporation's Innovation and Growth Department, compiles some demographic information about the workforce population, particularly on the FPS sector. In the most recent release, published in July 2023, the following insights were drawn:

- Females are underrepresented in the City workforce, making up 36% of employees.
- 61% of the City workforce is aged between 22 and 39 years, higher than the equivalent group for England and Wales (40%).
- 37% of the City's workforce identify as Black, Asian or of Minority Ethnic Origin.

The full briefing can be found here: [City statistics briefing - City of London](#)

### **Air quality data**

We measure air pollution at 90 locations across the Square Mile. Air pollution has an impact on the health of everyone, though children and the elderly are the most vulnerable. There is a wealth of evidence and research about the health impacts of air pollution, which we refer to when delivering our programme to improve air quality.

The protected characteristics most impacted by the health impacts of air pollution are children and the elderly, along with people with certain health conditions like heart and lung disease. Action to support these communities is reflected in the action plan attached to the Air Quality Strategy.

## Equality Impact Assessment

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Some communities may be at a disadvantage when trying to access information about how to manage the impact of air pollution on their health so we have worked with our neighbouring boroughs of Tower Hamlets, Hackney and Newham on a specific programme to work with hard to reach communities, training pharmacists to deliver health messages.

**Has there been any consultation with, or input from, customers / service users or other stakeholders?** If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

The draft strategy is out for consultation for 8 weeks. The consultation closes on 26<sup>th</sup> July 2024. It is being hosted on the Common Place web site, which is fully accessible, and has been widely distributed. We will also be holding five drop-in events across the Square Mile.

**Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?**

No satisfaction surveys have been undertaken. The work programme is a statutory function, much of what we deliver is prescribed by the government / Greater London Authority. As part of the consultation, stakeholders have been invited to recommend areas for additional air quality monitoring and additional actions to improve air quality.

### Step 3 – Identifying the negative impact.

a. Is there any negative impact on individuals or groups in the community?

Equality Themes	Positive Impacts	Negative Impacts identified	Solutions (ways in which you could mitigate the negative impact)
<b>Age</b> (including children, young people and older people)	Improving air quality has a positive impact on everyone	Air pollution has the greatest impact on the health of children and the elderly	<p>We measure air pollution at all schools and nurseries in the Square Mile. We provide annual reports for the schools/ nursery and support them with activities to educate children and their parents about air pollution.</p> <p>We have undertaken 3 x year-long citizen science programmes with residents to help them understand how to avoid high levels of air pollution.</p> <p>We make current air quality data available on line at <a href="http://airqualityengland.co.uk">Air quality in England (airqualityengland.co.uk)</a> and support a London wide air pollution alert service administered by the Greater London Authority.</p>
<b>Disability</b> (including carers)		Air pollution can aggravate some health conditions.	We have trained health practitioners and

		<p>Differential parking charges based on emissions from vehicle has the potential to impact negatively on disabled drivers.</p> <p>Decisions around traffic management can impact on people with a disability</p>	<p>pharmacists so they can advise patients who are vulnerable on steps they can take to minimize the impact of air pollution on their health.</p> <p>We make current air quality data available on line at <a href="http://airqualityengland.co.uk">Air quality in England (airqualityengland.co.uk)</a> and support a London wide air pollution alert service administered by the Greater London Authority.</p> <p>Parking charges are dealt with by Highways and we expect that team to undertake an EIA for their service area as required</p> <p>Traffic management decisions are managed and delivered through the Transport Strategy. and we expect the Transport teams to undertake an EIA for their service area as required</p>
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## Equality Impact Assessment

<b>Gender</b> (men and women)			No specific impact
<b>Race</b> (including Gypsies & Travelers and Asylum Seekers)		<p>Some communities can be at a disadvantage when trying to access information to help them manage their exposure to air pollution</p> <p>Some communities could be at a disadvantage when applying for a Clean City Award for best practice as they do not have the right resources</p>	<p>We have delivered a programme with LB Hackney, Newham and Tower Hamlets to deliver messages about air pollution to some hard- to-reach communities.</p> <p>A new Air Quality Information web site has been designed with our communities, to be user friendly and contain appropriate, easy to understand information. It is called <a href="#">Air Aware</a> . It is fully accessible and the information on the web site is available in 18 different languages.</p> <p>The Clean City Awards have been running since 1994 are managed by the Recycling Team and we expect that team to undertake an EIA for their service area as required</p>

## Equality Impact Assessment

<b>Religion or belief</b> (including people of no religion or belief)			No specific impact
<b>Gender Re-assignment</b> (those that are going or have gone through a transition: male to female or female to male)			No specific impact
<b>Pregnancy and Maternity</b>		Air pollution can have a pre-natal impact on health	High levels of air pollution can result in low birth weight. We have trained health practitioners and pharmacists so they can advise pregnant women on steps they can take to minimise the impact of air pollution on their health
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)			No specific impact
<b>Marriage and Civil Partnership</b>			No specific impact
<b>Human Rights</b>			No specific impact



### Step 4 – Changes or mitigating actions proposed or adopted

**Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure?  
What changes or mitigating actions are proposed?**

As part of the air quality programme, we will continue to consider the varying impact of air pollution and access to information of different City of London communities. This will be reported on annually.

### Step 5 – Monitoring

**How are you going to monitor the existing service, function, policy or procedure?**

An annual report will be produced and submitted to PHES committee and the Health and Wellbeing Board to track progress with actions in the Air Quality Strategy. This report is a statutory requirement and will also be submitted to the Greater London Authority and the government.

### Part C - Action Plan


Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale
Groups that are more vulnerable to the health effects of air pollution have already been identified and action taken to ensure that they have good quality data and	Continue to consider the varying impact of air pollution and access to information of different City of London communities.	Ruth Calderwood	2025 to 2030

## Equality Impact Assessment

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<p>information to help them to avoid high levels of air pollution.</p> <p>The aims of this strategy are to go beyond national statutory targets and deliver better air quality that will have a positive health outcome on all of our communities</p>	<p>This will be delivered as part of the Air Quality Strategy and reported on annually</p> <p>Check census data as it is updated over time and ensure there are no barriers to different communities in delivery of the Air Quality Strategy</p>		
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**Equality Impact Assessment approved by:**

<p>Head of Service:</p> 	<p>Date: 14<sup>th</sup> October 2024</p>
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**Please send an electronic copy of the Equality Team**