Vehicle Removal, Relocation and Pound Services — Equality Impact Assessment

Introduction: what an Equality Impact Assessment is and why we carry one out

An Equality Impact Assessment (EqIA) helps Ealing Council make sure that what it does, and how it does it, does not discriminate against residents, service users, visitors or staff, and that it advances equality wherever it reasonably can. Completing an EqIA makes everyone involved in a decision stop and think carefully about who will be affected, how, and whether some groups will feel the effects more than others. It then records what the Council will do about it.

The EqIA is also how the Council shows it has met the Public Sector Equality Duty in section 149 of the Equality Act 2010. The duty requires the Council, in everything it does, to have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and people who do not; and
- foster good relations between people who share a protected characteristic and people who do not.

The duty covers the nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. In line with the Council's commitment to reducing poverty and inequality, this assessment also considers socio-economic disadvantage and other groups known to face poorer outcomes locally. Ealing Council assesses its decisions and actions for their equality impact. Assessments for Cabinet decisions are published with the Cabinet report, and others are held by the service and available on request.

Why this assessment matters for vehicle removal. Removing a vehicle is one of the most intrusive powers a parking authority holds. It takes away a person's property and their means of travel, often without warning, and recovering the vehicle costs several hundred pounds and means a journey to a pound outside the borough. The people affected are often caught at a moment of stress, and some are far less able than others to absorb the cost, the journey, or the process. The service has clear benefits too: it keeps pavements, dropped kerbs, crossings, bus stops and disabled bays clear, which matters most to disabled people, older people, children and parents with buggies. This assessment weighs both sides.

How this assessment was prepared. It draws on Census 2021 and other published data for Ealing (Appendix A), national evidence, the October 2026 review of the Council's current removal procedure (SOP71 Pound Removal Guidance), and the operational experience of Parking Services and Greener Ealing Limited. Its findings are being used to shape the revised removal policy and the specification for the removal and pound contract, and any remaining actions are set out in the action plan in Section 3. It is a working document. It will be updated after engagement with affected groups and as monitoring data becomes available, and the completed assessment should be appended to the decision report that adopts the revised policy.

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Title of Equality Impact Assessment	Vehicle Removal, Relocation and Pound Services, including the revised Vehicle Removal, Relocation and Storage Policy (replacing SOP71 Pound Removal Guidance) and the removal and pound services contract
Name of lead report author	Tom Gallagher
Job Title	Head of Parking
Service Area	Parking Services, Housing and Environment Directorate
Name of Assistant Director / Director	Tony Singh, Assistant Director for Sustainable Transport
Date of initial assessment	26th October 2026; updated 4 November 2026 to reflect the provider's service proposal (draft for engagement and approval)
Dates of assessment reviews How often will this assessment be updated and reviewed?	Annually (first review October 2027), or sooner if the Council decides to use its powers under Part 5 of the London Local Authorities and Transport for London Act 2008, or if the pound location or contractor changes, the policy or legislation changes, or monitoring shows a disproportionate impact on any group.

1: Proposal

Summarise the aims and objectives of the proposal — this links with the "legitimate aim".

Question	Response
Describe the proposal • What is the background or context to this decision? • Why are you making this decision? • Who are the key stakeholders whom this decision will impact? • What does the decision relate to — policy, practice, service, function or initiative? • How does this relate to existing plans and strategies? • What is the decision-making route? • What involvement and consultation has been or will be carried out, and with whom? • What are the timescales? • What are the key documents being produced?	**Proposal:** To adopt a revised Vehicle Removal, Relocation and Storage Policy and an operating procedure beneath it, and to put in place a removal and pound services contract that delivers the policy to defined standards. The assessment covers the whole customer journey: the decision to remove or relocate a vehicle, its removal and transport, storage and release at the pound, disposal of unclaimed vehicles, and the right to make representations and appeal. **Background/Context:** The Council removes vehicles that have been issued a Penalty Charge Notice (PCN), under the Road Traffic Regulation Act 1984 (ss.99–102) and regulation 5C of the Removal and Disposal of Vehicles Regulations 1986. Civil Enforcement Officers employed by Greener Ealing Limited (GEL), the Council's wholly owned company, make the decisions. Removals and the pound are to be provided by NSL Ltd under a 12-month services contract, in line with NSL's proposal (version 3, June 2025). The pound is at East Lane Business Park, Wembley (HA9 7NA), in the London Borough of Brent, and would be shared with Brent in an expanded compound. Details are in the service delivery row below. Release and storage charges are set London-wide by London Councils with the Mayor's approval. Since 7 April 2025 they have been £280 to release a vehicle, £55 for each day of storage and £100 for disposal, payable in addition to the penalty charge. Since September 2025 the Council has also run a pilot to remove abandoned, unroadworthy and heavily fined vehicles. More than 1,700 vehicles were removed in its first year, including some from housing estates. **Reason for Decision:** An October 2026 review found that the current procedure (SOP71, last revised 2022) relies on revoked legislation. It also states a 15-minute wait that is shorter than the law allows for most vehicles in parking places, says nothing about disposal or the statutory right to make representations, and has no equality safeguards. The removal and pound contract is being re-procured at the same time. The decision therefore aims to make the service lawful, fair and consistent and to make sure equality is built into it. **Key Stakeholders:** Keepers and drivers of vehicles that are removed or relocated (residents, visitors, businesses, non-UK keepers); Blue Badge holders; pedestrians, wheelchair users and other footway users; bus operators and Transport for London; emergency services and the Metropolitan Police; event organisers and highway works teams; GEL; the removal and pound contractor; Parking Services staff; Housing, Community Safety and Adult Social Care. **Decision Relates To:** A policy and an operational service delivering statutory functions. **Relation to Plans/Strategies:** The service directly supports the Council Plan 2026–30, "Values in action". Mission 5 commits to "keep our streets clean and our roads clear", including a new kerbside strategy (deliverable 5.2), the Ealing Broadway Safer Streets scheme to improve safety and accessibility (5.3) and a 24/7 abandoned vehicle service (5.4). It also supports Mission 4 (crime and antisocial behaviour, including the Male Violence Against Women and Girls Strategy, 4.5, and safe local events, 4.6), Mission 7 (cost of living and access to financial support), Mission 3 (the homelessness strategy) and the guiding value "Growth across all 7 towns", which asks that services work fairly in every town. It also links to the network management duty (Traffic Management Act 2004, s.16), the Transport Strategy and Local Implementation Plan, the abandoned vehicles pilot and the Blue Badge enforcement policy in development. **Decision-Making Route:** The policy should be adopted by a Cabinet Member or Cabinet decision, because enforcement policy should be set at member level and published. The operating procedure is approved by the Head of Parking. The contract award follows the Council's procurement and delegated decision rules. **Involvement/Consultation:** Internal review (Parking Services, GEL, Legal Services). Engagement planned for January–February 2027 with local

Question	Response
	disability organisations, Blue Badge holders (including at the planned Perceval House holder event), faith and community groups in Southall and other high-removal areas, Housing and Community Safety, and Gypsy, Roma and Traveller advocacy organisations (Action A14). **Timescales:** Interim operational instruction by 30 November 2026; engagement January–February 2027; policy decision by March 2027; contract standards in place from contract start. **Key Documents:** Review of SOP71 (October 2026); revised Vehicle Removal, Relocation and Storage Policy and SOP; this EqIA; decision report; removal and pound contract specification.
Service delivery model • Where is the service delivered from? • How close is it to the people affected? • On which days and at what times does it operate?	**Pound location:** East Lane Business Park, Wembley (HA9 7NA), London Borough of Brent, shared with Brent. North Wembley station is just under half a mile away; Preston Road and South Kenton stations are about 1.5 miles away. **Proximity to Ealing (straight-line, approximate):** Perivale 2.1 miles; Greenford 2.4 miles; Northolt 3.1 miles; Ealing Broadway 3.3 miles; Acton 4.0 miles; Hanwell 4.1 miles; Southall Broadway 4.8 miles; Southall Green 5.5 miles. Road and public transport journeys will be longer. The wards furthest from the pound (Southall Green and Southall Broadway) are also the borough's most deprived (see Section 2.3). **Removal operation:** one 7.5-tonne removal truck, Monday to Saturday (312 days a year), working a planned schedule focused on dangerous parking, blocked dropped kerbs, high-priority contraventions and persistent evaders, plus a call-out service for unplanned removals. No routine Sunday or overnight removals are proposed. A Civil Enforcement Officer travels on the truck, authorises each removal, completes a vehicle condition report and records the removal on body-worn video. If the driver returns before the vehicle is on the load bed, the vehicle is released at the roadside. The trucks carry vulnerable road user cameras and alert systems. **Pound opening:** the public counter is open 9am–7pm "during times that London Borough of Ealing are making use of the removal facility". Whether it opens on Sundays and bank holidays is not stated and must be confirmed (A16). Storage charges apply from day two. **Payment at the pound:** cash, plus credit and debit cards through the Council's card payment system, before the vehicle is released. Keeping cash helps people without bank accounts or cards, and keeping cards means no one has to carry large sums. Whether contactless, telephone and third-party payments are accepted is to be agreed at implementation (A8). **Wheelchair accessible vehicles (WAVs):** the Council will not take a privately used WAV to the pound (see Disability, Section 2.1, and A17). **Disposal:** keeper letters on days 8, 19 and 33 and disposal from day 40. Vehicles with no traceable keeper (for example foreign-registered vehicles) are held for 14 days before the Council is asked to approve scrapping. Early disposal is proposed where fees exceed the vehicle's value. Scrap and auction income is shared 50:50 between the Council and the provider. **Blue Badge fraud:** joint operations with the Council's Blue Badge investigators are offered. **Abandoned vehicles:** the Council Plan commits to a 24/7 abandoned vehicle service (deliverable 5.4). That service sits outside this contract, but any night-time removals should follow the same welfare, Motability and WAV safeguards (A3, A17).
Outline the information or evidence in support of the proposal and NOT in support of the proposal • Are there gaps in the data, or groups missing? • What local and national data sources have been used? • What information, insight and data does not support this proposal?	**Information in support of the proposal:** • **Safety and access:** removal is targeted at vehicles on footways, dropped kerbs, crossings, bus stops, school keep-clear markings and disabled bays. These locations matter most to disabled people, older people, children and parents with buggies. • **Fairness:** removal is often the only effective response to persistent evaders and foreign-registered vehicles, where penalties cannot otherwise be recovered. It also protects disabled bays from misuse of Blue Badges.

Question	Response
	• **Neighbourhood quality:** the abandoned vehicle pilot removed more than 1,700 vehicles in its first year, freeing space and improving estates. • **Legal compliance:** the revised policy corrects the statutory timings and adds the notice of representation rights that must be given on every release, reducing the risk of unfair outcomes. **Information that does not support the proposal, or shows risk:** • **Cost:** a typical removal costs the keeper more than £400 once the release fee, storage and penalty charge are added. Ealing has become relatively more deprived: it is ranked 45th of 296 local authorities in the Indices of Deprivation 2025, compared with 85th in 2019 on the same basis. Child poverty after housing costs is estimated at 34%. • **Distance:** the pound is in Brent, between about 2 and 5.5 miles (straight-line) from Ealing's town centres, and furthest from Southall. A household whose only vehicle has been removed has to make the journey by public transport or taxi. • **Gaps in the provider's proposal:** it does not cover pound accessibility, Motability or adapted vehicles, interpreting, or Sunday opening. These have been added to the action plan (A4, A16, A17). • **Gaps in the current procedure:** SOP71 has no safeguards for disabled people, people who would be left stranded, or people living in vehicles, and does not explain how to challenge a removal. **Data gaps:** the Council does not currently collect equality information about keepers of removed vehicles or people who make representations. Removal data has not been analysed by ward, time of day or reason. The Ealing figure for Blue Badges held should be taken from DfT tables or service records. Actions A11 and A14 address these gaps. **Local and National Data Sources Used:** Ealing Council Plan 2026–30 and delivery plan 2026–27; Census 2021 (ONS, via censusdata.uk and the GLA); ONS mid-year estimates; Ealing Indices of Deprivation 2025 summary (Ealing Data, June 2026); Ealing JSNA; Trust for London borough indicators; DfT Blue Badge statistics 2024–25; London Councils / Mayor of London decision MD3328 on charges; Parking Services removal records; the October 2026 review of SOP71. See Appendix A.

How will this proposal ensure that we are meeting our Equality Objectives, or mitigating against negative impact on these objectives?		
Objective 1: Access to our information, services and facilities is fair and equitable for everyone	**Objective 2:** High levels of community cohesion are maintained	**Objective 3:** Gaps in outcomes for citizens are narrowed
Plain-English, easy-read and translated release information, an assisted telephone route, wider ID and payment options, and accessibility standards for the pound written into the contract (A4, A6–A8).	A published priority order and ward-level monitoring show that enforcement follows contraventions, not communities. Engagement with faith and community groups in high-removal areas (A1, A11, A14).	Vehicles displaying a valid Blue Badge are relocated, never taken to the pound. Clear footways and dropped kerbs benefit disabled and older people. Hardship and vulnerability are considered in representations (A1, A2, A10).
Objective 4: A positive, diverse and inclusive workforce is ensured and promoted	**Objective 5:** A robust, accurate and up-to-date evidence base of equalities information	**Objective 6:** Equality evidence is embedded in decision-making
Equality, hidden disability, safeguarding and conflict-management training for GEL officers, removal crews and pound staff, with staff safety built into the procedure (A12).	Quarterly monitoring of removals by reason, ward and time, Blue Badge-related removals and representation outcomes, plus voluntary equality monitoring (A11).	This EqIA has directly shaped the revised policy and the contract specification. It will be reviewed annually and whenever the service changes (A18).

The objectives shown are the Council's published equality objectives (2020–24), which were the most recent published on the Council's website at the time of writing. Replace them with any objectives the Council has since adopted. The Council Plan 2026–30 does not set separate equality objectives. It does commit the Council to monitoring "whether improvements are being felt fairly across different communities and places", which this assessment's monitoring supports (A11).

2: Impact Analysis

2.1: Protected Characteristics

There are nine protected characteristics set out in the Equality Act 2010.

When assessing the impact of decisions, public authorities have a duty to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

This assessment considers each protected characteristic and how the removal, relocation and pound services might affect people who share it. Ealing Council and Greener Ealing Limited (GEL) staff are included where relevant. It also considers existing systemic inequalities in access to services and how the service may reduce or aggravate them.

Protected Characteristic	Is there a potential positive and/or negative impact?	Explain impacts and provide evidence. Consider potential evidence gaps and how these could be filled.	What actions will be taken to mitigate negative impacts and to maximise positive impacts? (SMART where possible; action references link to Section 3)
Age	**Positive:** clearing footways, crossings and school keep-clear markings protects children and older pedestrians. **Negative:** older people may rely more on a car to get to health appointments and may find online services (TRACE, online payment) and the journey to an out-of-borough pound harder. Younger drivers tend to have lower incomes, so the charges hit them harder.	12.1% of Ealing residents are aged 65+, 5.3% are 75+ and 19.5% are under 16 (Census 2021). Removals at school keep-clear markings (code 48) protect children directly. **Gap:** the age of keepers of removed vehicles is not recorded. Monitoring and representation data will help fill this (A11).	A3: welfare check before removal. A4: pound accessibility standards, including seating and step-free access. A6: assisted telephone route and printed information for people who are not online. A11: monitor outcomes.
Disability	**Positive:** removing vehicles from dropped kerbs, footways and disabled bays (codes 27, 62, 40) directly helps wheelchair users, people with visual impairments and Blue Badge holders. Removing vehicles that display fraudulent or misused badges protects disabled bays for genuine holders. **Negative:** removing a vehicle used by a disabled person can leave them without transport, separated from mobility aids or medication, and facing a difficult journey. People with non-visible conditions may not be recognised as disabled at the roadside. Adapted vehicles may need	14.6% of Ealing residents are disabled under the Equality Act (6.8% limited a lot) (Census 2021, age-standardised). In England, 3.07 million Blue Badges were held at 31 March 2025; London has the lowest regional share, at 3.5% of the population (DfT). The Ealing figure should be added from DfT tables or service records. Eligibility was extended to people with non-visible conditions in 2019. The October 2026 review found SOP71 does not say that vehicles displaying a valid badge are protected from removal to the pound. Immobilising (clamping) them is prohibited by regulation 14(1) of the 2022 General Regulations.	A1/A2: vehicles displaying a valid Blue Badge are relocated to the nearest safe legal place, and never taken to the pound. TRACE is told. A1/A17: privately used wheelchair accessible vehicles (WAVs) are never taken to the pound, whether or not a Blue Badge is displayed. Where one is causing danger or obstruction it is relocated nearby, with a PCN issued as normal. A17: Motability and adapted vehicle protocol. A3: welfare check, including for mobility aids and medication left in vehicles. A4: step-free access to the pound counter, seating, and free access to essential items at any time. Deaf customers are supported through written

Protected Characteristic	Is there a potential positive and/or negative impact?	Explain impacts and provide evidence. Consider potential evidence gaps and how these could be filled.	What actions will be taken to mitigate negative impacts and to maximise positive impacts? (SMART where possible; action references link to Section 3)
	specialist recovery to avoid damage. The pound process can be particularly hard for people with communication, sensory, learning or neurodivergent needs. **Motability vehicles:** the registered keeper is Motability Operations, not the disabled customer, so the customer has no V5C and keeper letters go to Motability. The driver may be a named carer or family member rather than the disabled person. Adapted vehicles (hand controls, hoists, ramps, lowered floors) can be damaged by standard recovery. Neither SOP71 nor the provider's proposal addresses these vehicles.		communication, with BSL interpreting arranged by the Council on request. A6: easy-read information. A12: hidden disability awareness training. A10: disability considered in representations.
Gender Reassignment	**Neutral overall, with one specific risk:** release requires identity and ownership documents. Trans people are more likely to have documents in different names or genders, so questioning at the counter could cause distress or an unwanted disclosure.	1.0% of Ealing residents aged 16+ (around 3,000 people) said their gender identity differs from their sex registered at birth (Census 2021). **Gap:** no service data. This risk is identified from national evidence about access to services.	A7: accept documents in different names with supporting evidence (for example a deed poll), and handle the process discreetly. A12: staff training on respectful treatment and confidentiality.
Marriage or Civil Partnership (only applies to the duty to have due regard to the need to eliminate discrimination)	**No differential impact identified.** Couples often share a vehicle registered to one partner, so a partner may need to collect it.	44.8% of Ealing residents aged 16+ are married or in a civil partnership (Census 2021).	A7: clear, simple process for a partner or other person to collect the vehicle with the keeper's authority.
Pregnancy & Maternity	**Positive:** clear footways and crossings help people with prams and buggies, and keep-clear removals protect children outside schools. **Negative:** pregnant women and parents with babies may be stranded, and child car seats, prams, feeds or	There were around 4,150 live births in Ealing in 2021 (Ealing JSNA). National loading and boarding exemptions allow people to stop briefly to load or help passengers, which reduces the risk of enforcement in genuine situations. **Gap:** no service data.	A3: welfare check before removal, including whether a child or pregnant person would be left stranded. A4: free, prompt access to car seats and essential childcare items at the pound. A10: consider in representations.

Protected Characteristic	Is there a potential positive and/or negative impact?	Explain impacts and provide evidence. Consider potential evidence gaps and how these could be filled.	What actions will be taken to mitigate negative impacts and to maximise positive impacts? (SMART where possible; action references link to Section 3)
	medication may be inside the removed vehicle.		
Race / Ethnicity (including colour, nationality, and ethnic or national origins)	**Mixed.** Ealing is one of the most diverse boroughs in the country. The risks are indirect: language barriers, removal of foreign-registered vehicles (nationality), and a perception of targeting if removals are concentrated in particular areas. Gypsy, Roma and Traveller communities, who may live in vehicles or caravans, are considered in Section 2.2. **Positive:** the same criteria applied consistently across the borough, with published data, can build trust.	Census 2021: White 43.2% (White British 24.3%, Other White 16.1%), Asian 30.3% (Indian 14.9%, Pakistani 4.6%), Black 10.8% (Black African 6.2%, Black Caribbean 3.5%), Mixed 5.2%, Other 10.6% (Arab 4.4%). 30.9% of residents aged 3+ do not have English as their main language, and 6.5% cannot speak English well or at all. Ealing has around 17,000 Panjabi speakers (the most of any London borough) and 15,000 Polish speakers. The most deprived wards (Southall Green, Northolt West End, Southall Broadway) include some of the borough's most diverse communities. Prioritising foreign-registered vehicles that evade penalties affects non-UK nationals more. This is justified because penalties cannot otherwise be recovered from them, and the same criteria apply to UK vehicles. Under the provider's proposal, vehicles with no traceable keeper (often foreign-registered) can be put forward for scrapping after 14 days, compared with 40 days and three letters for UK-registered vehicles. That shorter route affects non-UK nationals more and needs a safeguard (A15). **Gap:** removals have not been analysed by ward.	A6: release information and notices in plain English and the main community languages (Panjabi, Polish and others identified from data), with interpreting or AI translation at the pound. A15: Council approval and extra tracing steps before any vehicle with no traceable keeper is disposed of. A11: quarterly ward-level monitoring, with any concentration investigated and explained. A12: cultural awareness training. A14: engagement with community groups.
Religion and Belief (including no religion or belief)	**Positive:** relocating vehicles for festivals and events (for example Vaisakhi in Southall, Diwali and Eid gatherings) means those events can go ahead safely. **Negative:** parking pressure around places of worship at prayer and service times could lead to more removals of worshippers' vehicles. Restrictions for religious events need advance notice that the communities concerned can understand.	Census 2021: Christian 37.8%, Muslim 18.8%, Sikh 7.8%, Hindu 7.7%, no religion 19.1%, Buddhist 1.1%, Jewish 0.3%. Ealing has one of the largest Sikh communities in the UK. **Gap:** no data on removals near places of worship or at particular times.	A6: advance notice of event suspensions in relevant community languages, shared through places of worship. A11: monitor removals by location and time. A14: engagement with faith groups ahead of major festivals.

Protected Characteristic	Is there a potential positive and/or negative impact?	Explain impacts and provide evidence. Consider potential evidence gaps and how these could be filled.	What actions will be taken to mitigate negative impacts and to maximise positive impacts? (SMART where possible; action references link to Section 3)
Sex	**Negative (women):** a woman left alone without her vehicle, particularly at night, faces greater personal safety risk. Women are also more likely to be lone parents and carers and to have lower incomes, so the cost hits them harder. **Possible impact on men:** men may make up a larger share of keepers of removed vehicles. This is not yet known.	Women are 50.7% of Ealing residents (Census 2021). The risk to women's safety reflects the Council's work on violence against women and girls. **Gap:** the sex of keepers and drivers of removed vehicles is not recorded.	A3: night-time rule (removals between 10pm and 6am limited to safety and very high priority cases, with supervisor authorisation) and a check on whether removal would leave someone stranded. A11: monitoring.
Sexual Orientation	**No differential impact identified.** The service must be free of harassment and treat everyone with respect.	3.3% of Ealing residents aged 16+ identify as lesbian, gay, bisexual or another minority orientation (Census 2021).	A12: equality training for officers, crews and pound staff.

2.2: Additional Groups

This assessment also considers socio-economic disadvantage and other groups known locally to face inequality of outcomes. The socio-economic duty in section 1 of the Equality Act 2010 has not been brought into force in England. The Council considers socio-economic disadvantage as good practice and in keeping with its commitment to reducing poverty and inequality.

Group or characteristic(s)	Is there a potential positive and/or negative impact?	Explain impacts and provide evidence. Consider potential evidence gaps and how these could be filled.	What actions will be taken to mitigate negative impacts and to maximise positive impacts? (SMART where possible; action references link to Section 3)
Socio-economic inequalities	**Negative:** the cost of recovering a vehicle (release fee, storage, penalty charge) is the same for everyone, so it falls hardest on people on low incomes. Some of them need a vehicle for low-paid shift or self-employed work, and losing it for several days can cost them income. **Positive:** removing persistent evaders and abandoned vehicles frees space for residents and makes enforcement fairer.	Indices of Deprivation 2025: Ealing is ranked 45th most deprived of 296 local authorities (85th in 2019 on the same basis). The most deprived wards are Southall Green, Northolt West End and Southall Broadway. Child poverty after housing costs is estimated at 34% (London 31%) (Trust for London). 54.0% of households are deprived in at least one Census dimension. A removal will typically cost more than £400. The provider proposes early disposal where fees exceed the vehicle's value. This falls hardest on owners of older, low-value vehicles, who are more likely to be on low incomes. A 50:50 share of scrap and auction income also gives both parties a financial	A5: storage charges not to accrue for periods when the pound is closed. A15: no early disposal without Council approval and a final notice to the keeper. A8: a range of payment methods. A10: hardship and compelling reasons considered in representations, and signposting to money advice on release. A11: monitoring by ward deprivation.

Group or characteristic(s)	Is there a potential positive and/or negative impact?	Explain impacts and provide evidence. Consider potential evidence gaps and how these could be filled.	What actions will be taken to mitigate negative impacts and to maximise positive impacts? (SMART where possible; action references link to Section 3)
		interest in disposal, which needs a clear safeguard.	
Unpaid carers and care workers	**Negative:** carers may depend on a vehicle to reach the person they care for. Removing it may interrupt care, or force the carer to leave the cared-for person to collect it.	7.5% of Ealing residents aged 5+ provide unpaid care, and 2.1% provide 50 or more hours a week (Census 2021, age-standardised).	A3: welfare check. A7: simple process for collection on someone else's behalf. A10: caring responsibilities considered in representations.
People living in vehicles, homeless people and people in temporary accommodation (including Gypsy, Roma and Traveller households)	**Negative (high severity):** where a vehicle is someone's home, removing it can make them homeless and separate them from their belongings. This engages Article 8 of the European Convention on Human Rights (respect for private and family life and home) and may affect Gypsy, Roma and Irish Traveller people, who are protected as ethnic groups.	Ealing has 24.5 households in temporary accommodation per 1,000 (London 20.5, England 5.5) (Trust for London). Census 2021 recorded around 250 Gypsy or Irish Traveller residents and about 0.4% Roma. Vehicle dwelling is visible in West London, but **no local data** is held.	A9: protocol with Housing Needs and Community Safety. No vehicle that appears to be lived in is taken to the pound without a welfare assessment and referral, except where there is immediate danger. Belongings are secured, and decisions are recorded with the proportionality considerations noted.
Domestic abuse victims and survivors	**Negative:** a vehicle may be a survivor's means of escape or temporary shelter. The release and representation processes involve address checks and correspondence that could expose a survivor's location.	National evidence and the Council's Community Safety priorities. **Gap:** no service data. Cases are likely to be identified through representations or at the pound.	A13: safeguarding referral route, and handling of addresses and correspondence that protects survivors. Agreed with Community Safety.
Care-experienced people and care leavers	**Negative:** young people leaving care often have low incomes and limited family support to help with costs or collection.	London councils increasingly treat care experience as if it were a protected characteristic. **Gap:** no service data.	A10: care experience considered as part of compelling reasons in representations.
Digitally excluded people and people with limited English	**Negative:** the main tools for finding a removed vehicle (TRACE online) and paying for it are online.	30.9% of residents do not have English as their main language. National data shows older and low-income residents are less likely to be online. **Gap:** no local digital exclusion figure.	A6: assisted telephone route, printed information (including in libraries), and translated material.
Armed Forces community	**No differential impact identified.** The Armed Forces Covenant duty does not extend to parking functions.	No borough-level veterans figure could be verified for this draft.	None beyond general mitigations.

2.3: Intersectional Analysis

Taking an intersectional approach means being alert to how combinations of characteristics can create very different experiences for different people, because different types of systemic disadvantage interact. It is not

just about impacts that affect several groups. It is also about distinct impacts that arise only where characteristics meet. For example, a minor impact on disabled people and a minor impact on women may combine into a disproportionate impact on disabled women.

Describe emerging theme or group	Is there a potential positive and/or negative impact?	Explain impacts and provide evidence. Consider potential evidence gaps and how these could be filled.	What actions will be taken to mitigate negative impacts and to maximise positive impacts? (SMART where possible; action references link to Section 3)
Disabled women and older women alone at night	**Negative:** the combination of disability or age, sex and time of day makes the risk of being stranded much more serious than any one factor alone.	Based on the age, disability and sex evidence above. **Gap:** no data on removals by time of day.	A3: night-time rule and stranding check. A11: report removals by time of day.
Older South Asian residents with limited English in Southall and Northolt	**Negative:** language barriers, age and higher deprivation together make it harder to find out what happened, recover the vehicle and challenge the removal.	Panjabi is Ealing's most common non-English language. Southall Green and Southall Broadway are among the most deprived wards.	A6: Panjabi and other community-language information, and interpreting or AI translation at the pound. A14: engagement through community and faith groups in Southall. A11: ward-level monitoring.
Residents of Southall's deprived wards without a second vehicle	**Negative:** distance and deprivation combine. Southall Green and Southall Broadway are the most deprived wards in the borough and also the furthest from the Wembley pound (about 5–5.5 miles in a straight line, longer by road), so the journey takes the most time and money for the people least able to afford it.	Ward deprivation (IoD 2025) and pound distance analysis above. **Gap:** public transport journey times from each ward have not yet been measured.	A16: publish a journey guide from each Ealing town to the pound, including step-free routes and journey times. A5: storage charges not accruing for closed periods. A11: monitor removals and collection times by ward.
Low-income single parents (mostly women) with young children	**Negative:** cost, childcare and the journey to the pound combine, and child car seats may be inside the vehicle.	Child poverty after housing costs is estimated at 34%.	A4: free access to essential items. A5: storage charges not accruing for closed periods. A10: hardship considered.
Disabled people on low incomes, including those with adapted vehicles	**Negative:** the disability pay gap and dependence on an adapted vehicle make removal especially disabling.	Disability and deprivation evidence above.	A1/A2: valid-badge vehicles relocated, never taken to the pound. A1/A17: privately used WAVs never taken to the pound. A4: recovery vehicles suited to the vehicle being removed, chosen by the contractor.
Gypsy, Roma and Traveller households and other vehicle dwellers with children or disabilities	**Negative (high severity):** loss of home, combined with the needs of children or disabled people.	Temporary accommodation and Census evidence above. No local data on vehicle dwellers.	A9: protocol with Housing, including a welfare assessment before any action.

2.4: Community Impact Analysis

The Public Sector Equality Duty requires due regard to fostering good relations between people who share a protected characteristic and those who do not. This supports an inclusive borough with strong community cohesion.

What communities may be impacted? • Could this proposal affect how communities perceive or interact with others? • Could it help tackle prejudice and promote understanding? • Could it lead to prejudice, community tensions, conflicts, isolation or segregation?	What are or might be the positive or negative impacts? Consider potential evidence gaps and how these could be filled.	What actions will be taken to mitigate the negative and maximise the positive? (SMART where possible)
Residents, pedestrians and estate communities generally	**Positive:** safer and more accessible streets, clear pavements, and better estates (more than 1,700 abandoned or unroadworthy vehicles removed in the pilot's first year). **Negative:** removal can be seen as revenue-raising, which damages trust.	A1: published priority order explaining why vehicles are removed. A11: removal statistics published annually in the Annual Parking Report.
Communities in Southall, Northolt and other wards with high deprivation and diverse populations	**Negative:** if removals are concentrated in these areas, communities may feel they are being targeted, causing tension. **Positive:** consistent, transparent enforcement can build confidence.	A11: quarterly ward-level analysis, with any concentration investigated and explained. A14: engagement through community and faith groups.
Blue Badge holders and other drivers	**Positive:** visible action against badge fraud and misuse supports public confidence in the scheme and good relations between disabled and non-disabled residents. **Negative:** risk of suspicion or hostility towards genuine holders with non-visible conditions.	Messaging that enforcement targets misuse, not badge holders. A12: hidden disability training. A14: engagement at the Blue Badge holder event.
Faith communities and event organisers	**Positive:** relocation means major religious and community events can go ahead safely. **Negative:** poor notice of restrictions can cause frustration.	A6: advance notice in community languages. A14: engagement with organisers before major festivals.

3: Action Plan, Evaluation and Monitoring Impact

This section brings together the actions needed in the identified timeframe, working with the stakeholders identified above, and shows how the plan supports the Council's equality objectives. It shows how this assessment has influenced the proposal and decision and how it will be monitored, including the justification for any disproportionate impact.

Evaluation • Summarise any changes made to the proposal as a consequence of this Equality Impact Assessment	This assessment has directly shaped the revised policy and the contract specification. The changes are: • An express rule that vehicles displaying a valid Blue Badge are relocated, never taken to the pound. • An express rule that privately used wheelchair accessible vehicles are never taken to the pound. • A pre-removal welfare check and a night-time rule. • A protocol for vehicles that appear to be lived in. • Accessibility and essential-items standards at the pound, written into the contract. • Plain-English, translated and assisted information routes. • Wider ID and payment options. • Consideration of hardship and vulnerability in representations. • A new equality monitoring regime. • Safeguards added to the provider's proposal: pound accessibility, confirmed opening hours, a Council journey guide, disposal safeguards and a Motability protocol. The assessment also supports the correction of statutory timings and the introduction of the statutory notice of representation rights. These are legal requirements, but they also protect everyone from unfair outcomes.
Justification of remaining impacts • Where an adverse impact cannot be fully removed, why is it justified as a proportionate means of achieving a legitimate aim?	Some adverse impact remains, mainly the financial and practical burden on people on low incomes and people for whom losing a vehicle is especially disabling. The Council considers this justified as a proportionate means of achieving legitimate aims: road safety; the network management duty; keeping footways, crossings and disabled bays accessible; and fair enforcement of statutory penalties. Removal follows a contravention and can be avoided. It is targeted through a published priority order. Charges are set London-wide rather than by the Council. Everyone has a statutory right to make representations, including on compelling grounds, and to appeal to an independent adjudicator. The mitigations above are designed to reduce the remaining impact as far as practicable. The pound standards are set at a proportionate level for a short visit. Step-free access, seating and access to essential items are required. An accessible toilet and a hearing loop are not, and Deaf customers are supported through written communication and Council-arranged BSL interpreting. Recovery methods are left to the contractor's professional judgement.
Action Plan • Summarises all SMART actions highlighted in Section 2	See the action plan table below.
What are the arrangements for monitoring impact? • Who has responsibility for ongoing equality impact monitoring? • How will unexpected impacts be managed?	The Head of Parking is responsible for ongoing equality monitoring. The Parking Operations Manager will produce a quarterly report on removals and relocations, broken down by reason, contravention code, ward and time of day, together with Blue Badge-related removals and representation and appeal outcomes. Contract performance reports will cover the pound accessibility standards. Complaints, representations and tribunal decisions will be reviewed each quarter for equality themes. If an unexpected impact is identified, it will be escalated to the Head of Parking, who can issue an interim operational instruction immediately and will commission a review of this assessment. A summary will be published in the Annual Parking Report.

Action Plan

Ref	Action	Owner	Target date	Success measure
A1	Adopt the revised Vehicle Removal, Relocation and Storage Policy, including a published priority order and the rules that vehicles displaying a valid Blue Badge, and privately used wheelchair accessible vehicles (WAVs), are relocated, never taken to the pound.	Head of Parking	December 2026 (From go live)	Policy adopted by officer decision and published
A2	Interim operational instruction to GEL and the contractor: valid Blue Badge vehicles relocated; statutory waiting times applied; welfare check in place.	Head of Parking / Parking Operations Manager	December 2026 (From go live)	Instruction issued; monthly spot checks show compliance
A3	Pre-removal welfare check (no occupants, children or animals; mobility aids and medication; risk of leaving someone stranded) and night-time rule (10pm–6am: safety and very high priority cases only, with supervisor authorisation). This supports the Council Plan's MVAWG commitment (deliverable 4.5) and applies to night-time abandoned vehicle removals (5.4).	Parking Operations Manager / GEL	December 2026 (From go live)	100% of officers trained; 20 removal records audited each quarter
A4	Pound standards in the contract: step-free access from the street to the counter. Recovery vehicles suited to the size and type of vehicle, chosen by NSL as the specialist.	Parking Operations Manager	December 2026 (From go live) Audit within 3-months	Standards in the specification; audit passed
A5	Set when storage charges start and make sure they do not accrue for periods when the pound is closed.	Head of Parking	December 2026 (From go live)	Rule in the policy and the contract
A6	Plain-English, easy-read and translated release information (Panjabi, Polish and other languages identified from data), TRACE details, an assisted telephone route, printed copies in libraries, and advance notice of event suspensions in community languages. Use the Council's translation tools pilot (Council Plan deliverable 7.4), keep assisted and non-digital access (7.5), and make information available through community hubs (7.6).	Parking Operations Manager	December 2026 (From go live)	Materials published; telephone route live
A7	Release documents: the standard requirement is the V5C, a full driving licence (UK or other licence valid in Great Britain, so non-UK nationals are not excluded), proof of address and proof of insurance to drive away. Set alternatives for people who cannot meet it (Motability, hire, lease and company vehicles, new keepers, collectors who do not drive, documents in different names, collection by partners and carers). The Blue Badge questionnaire given at release is voluntary and never a condition of release.	Parking Operations Manager / contractor	December 2026 (From go live)	Release procedure updated; no complaints about refused release
A8	Keep cash and card payment at the pound, including contactless, and allow someone else to pay at the pound on the owner's behalf.	Parking Operations Manager	December 2026 (From go live)	Payment options available

Ref	Action	Owner	Target date	Success measure
A9	Protocol with Housing Needs and Community Safety for vehicles that appear to be lived in, including Gypsy, Roma and Traveller households. Aligned with the homelessness strategy (Council Plan Mission 3).	Head of Parking / Housing	December 2026 (From go live)	Protocol agreed; all relevant cases referred
A10	Guidance on compelling reasons in representations (disability, hardship, caring, care experience, domestic abuse, bereavement), and signposting to the Council's hardship support on release where appropriate. Link to the Council's crisis and financial resilience support (Council Plan deliverables 7.2 and 7.3).	Parking Operations Manager	December 2026 (From go live)	Guidance in use; outcomes monitored
A11	Quarterly equality monitoring (reason, code, ward, time of day, Blue Badge-related removals, representation outcomes), voluntary equality monitoring for representations, and annual publication. Feeds the Council Plan commitment to show whether improvements are felt fairly across all 7 towns.	Parking Operations Manager	First report by July 2027	Reports produced and reviewed by the Head of Parking
A12	Training for GEL officers, removal crews and pound staff: equality, hidden disabilities, Blue Badges, cultural awareness, safeguarding, conflict management.	GEL Managing Director / Parking Operations Manager	February 2027, then annually	100% completion
A13	Safeguarding route and secure handling of addresses for domestic abuse survivors.	Business Processing Manager / Community Safety	December 2026 (From go live)	Route agreed and staff briefed
A14	Engagement with disability organisations, Blue Badge holders, faith and community groups.	Head of Parking	December 2026 (From go live)	EqIA written and published
A15	Disposal safeguards: Council approval for every early disposal and every disposal of a vehicle with no traceable keeper; a final notice before early disposal; extra tracing steps for foreign-registered vehicles; checks for Motability, lease and Blue Badge indicators before disposal; personal property returned.	Head of Parking / Parking Operations Manager	December 2026 (From go live)	No disposal without recorded Council approval; monthly disposal report reviewed
A16	Confirm pound days and hours (including Sundays and bank holidays) with NSL.	Parking Operations Manager	December 2026 (From go live)	Hours confirmed in contract
A17	Motability, WAV and adapted vehicle protocol: define a privately used WAV (excluding licensed taxis, private hire and commercial fleet vehicles) and how officers identify one at the roadside; never take a WAV to the pound; where a vehicle is known to be a Motability vehicle, relocate rather than remove wherever possible; accept the Motability agreement and named-driver evidence at release; notify Motability promptly; never dispose of them early.	Parking Operations Manager / provider	December 2026 (From go live)	Protocol in the SOP and contract; officers briefed
A18	Review this EqIA after engagement, then annually and whenever the service changes.	Head of Parking	March 2027, then October 2027	Reviewed EqIA approved

Prepared by	Tom Gallagher (Head of Parking)  Date: 20th November 2026
Approved by	Tony Singh, Assistant Director for Transport  Date: 20th November 2026

Appendix A: Ealing demographic profile and evidence sources

Figures are from Census 2021 unless stated otherwise. Several were taken from sites that republish ONS data, or calculated from published counts, and should be checked against ONS or Nomis before the assessment is finalised. The Ealing Data website (data.ealing.gov.uk) holds the same data in interactive form.

Characteristic	Ealing figure	Source
Population	367,115 (Census 2021). Around 387,000 at mid-2025 (ONS estimate as reported locally; confirm before use).	ONS Census 2021; Ealing News, July 2026
Age	0–15: 19.5%; 16–64: 68.3%; 65+: 12.1%; 75+: 5.3%; 85+: 1.5%	Census 2021 TS007
Sex	Female 50.7%; male 49.3%	Census 2021 TS008
Ethnicity	White 43.2% (White British 24.3%, Other White 16.1%, Irish 2.3%, Roma 0.4%, Gypsy or Irish Traveller 0.07%); Asian 30.3% (Indian 14.9%, Pakistani 4.6%); Black 10.8% (African 6.2%, Caribbean 3.5%); Mixed 5.2%; Other 10.6% (Arab 4.4%)	Census 2021 TS021; ONS area profile
Country of birth	5.1% born in Poland	ONS area profile
Language	Main language not English: 30.9%; cannot speak English well or at all: 6.5%; households with no one whose main language is English: 18.7%; Panjabi around 17,000 speakers, Polish around 15,000	Census 2021 TS029, TS025; GLA briefing
Religion	Christian 37.8%; no religion 19.1%; Muslim 18.8%; Sikh 7.8%; Hindu 7.7%; Buddhist 1.1%; Jewish 0.3%; other 0.7%; not answered 6.7%	ONS area profile
Disability	Disabled under the Equality Act: 14.6% (limited a lot 6.8%, a little 7.8%), age-standardised	ONS area profile
Blue Badges	England 3.07 million (5.2%); London lowest region at 3.5%. Ealing figure to be added from DfT tables or service records	DfT Blue Badge statistics 2024–25
Sexual orientation	LGB+ 3.3% of those aged 16+; not answered 10.3%	Census 2021 TS077
Gender identity	Gender identity different from sex registered at birth: 1.0% of those aged 16+; not answered 8.8%	Census 2021 TS078
Partnership status	Married or civil partnership 44.8%; never married 41.7%; divorced 6.9%; widowed 4.4%; separated 2.1%	ONS area profile
Births	Around 4,150 live births (2021)	Ealing JSNA
Unpaid care	7.5% provide unpaid care; 2.1% provide 50+ hours a week (age-standardised)	ONS area profile
Car or van availability	No car 36.8%; one 43.8%; two 15.1%; three or more 4.3% (133,661 households)	Census 2021 TS045
Tenure	Owned 46.2%; shared ownership 2.0%; social rented 17.5%; private rented 34.0%	ONS area profile
Temporary accommodation	24.5 households per 1,000 (London 20.5; England 5.5)	Trust for London

Characteristic	Ealing figure	Source
Deprivation	IoD 2025: 45th most deprived of 296 local authorities (85th in 2019 on the same basis). Most deprived wards: Southall Green, Northolt West End, Southall Broadway. 54.0% of households deprived in at least one Census dimension	Ealing Deprivation 2025 summary (June 2026); Census 2021
Child poverty	34% after housing costs (London 31%)	Trust for London

Evidence gaps identified

- No equality data is held on keepers or drivers of removed vehicles, or on people who make representations (A11).
- Removal data has not yet been analysed by ward, time of day or reason (A11).
- The Ealing number of Blue Badges held should be taken from DfT tables DIS0105/DIS0108 or service records.
- There is no local data on vehicle dwellers or on removals near places of worship (A9, A11).
- No borough-level veterans figure could be verified.
- Figures marked as age-standardised (disability, unpaid care) differ slightly from crude percentages.

Other sources referred to

- ONS, How life has changed in Ealing: Census 2021 — ons.gov.uk/visualisations/censusareachanges/E09000009
- Census 2021 tables TS007, TS008, TS021, TS025, TS029, TS045, TS077, TS078 — censusdata.uk/e09000009-ealing
- GLA, Census 2021 briefing on ethnicity, national identity, language and religion — data.london.gov.uk
- Ealing Council, Ealing Deprivation 2025 summary report (June 2026) — data.ealing.gov.uk
- Ealing Council, Population characteristics JSNA — ealing.gov.uk
- Trust for London, Ealing poverty and inequality indicators — trustforlondon.org.uk
- Department for Transport, Blue Badge scheme statistics, April 2024 to March 2025 — gov.uk
- Mayor of London decision MD3328 (February 2025) on London parking charges — london.gov.uk
- Ealing Council, Public sector equality duty and equality objectives — ealing.gov.uk
- Ealing Council, Values in action: Council plan 2026–30, including the delivery plan 2026–27
- Ealing Parking Services, Review of SOP71 Pound Removal Guidance (October 2026)
- NSL Ltd, London Borough of Ealing Car Pound & Removal Proposal, version 3 (June 2025), commercial in confidence. Only service delivery details are used here, not prices.