

Markets Strategy 2024-29: Equalities Impact Assessment

London Borough of Hackney Equality Impact Assessment Form

The Equality Impact Assessment Form is a public document which the Council uses to demonstrate that it has complied with Equalities Duty when making and implementing decisions which affect the way the Council works.

Title and purpose of this Equality Impact Assessment:

Markets, Shop Fronts and Street Trading Strategy 2024-29

Purpose of this Equality Impact Assessment:

To determine the impact of the proposed Strategy for markets, shop fronts and street trading. The strategy will cover the period of March 2024 till March 2029.

Officer Responsible:

Name: Dan O'Sullivan	Ext: 5981
Directorate: Climate, Homes & Economy	Department/Division : Parking, Markets & Street Trading

1. Please summarise the service, function, policy, initiative or saving.

In summary, the primary drivers of the new strategy proposals are related to the following:

- Support the financial stability of the Markets accounts by breaking even and/or growth to reinvest in the markets.
- Encouraging shop front trading in Hackney to thrive and supporting new traders.
- Encouraging markets & street trading in Hackney to thrive and supporting new traders.
- Introducing new licenses to allow all licence holders to expand their small/micro businesses by trading in different types of markets.
- To increase street trading locations in order to reduce the number of applicants on the waiting list and to provide a trading location at the time they submit their application.
- Reduce the number of illegal trading activity within the borough to allow licensed traders to maximise on income opportunities.
- Offering all licence holders training to develop their entrepreneurial skills. 35% of licensed traders have never traded in any market location.

2. Who are the main people that will be affected?

Licence holders:

Those people that will be directly impacted by the proposals (Market Street and Shop Front Traders) include all licensed temporary and permanent street/shop front traders operating in Hackney and issued by the Council. This includes holders of both temporary and permanent licenses (Market Traders Database as of September 2019), a total of approx. 983 licence holders in the London Borough of Hackney. This is broken down into 233 Permanent Street

traders, 356 Temporary Street Traders, 166 Permanent Shop front traders and 228 Temporary shop front traders.

Information retrieved from traders database indicates that:

- The majority of market traders are aged 26-55 (74% out of 983 records) and there are low representation of younger 16-25 (10% out of 983 records) or older people (+65) working in markets (7% out of 983 records).
- The majority of market traders are male (72% of 983 records). Only 28% are female.
- The majority of market traders classify themselves as "British" (39% of 983 records) and other ethnic groups found in markets include African and African Caribbean, Jewish, Turkish/Cypriot and Asian albeit in much smaller numbers.

NB – The Service is unable to guarantee the revision of reliable information regarding trader Nationality, Ethnicity, Disability or Sexual Orientation. Although this information can be extracted from the system, it is not always provided by traders when applying for licences.

The legislation (London Local Authorities Act 1990) does not draw a distinction between those licence holders trading at a market or in front of a shop, so one interpretation of the requirement to give notice to licence holders is that all should be consulted. In short, all licenced traders affected by any proposals outlined and currently operating in Hackney and issued by the Council will also be contacted about the new strategy.

Residents:

The proposed recommendations detailed in the draft of the Strategy may affect some local residents should we implement new markets or street trading locations. Data analysis will be undertaken for implementation of any type of street trading activities to ensure local residents are not impacted due to noise or anti-social behaviour. We are committed to have a 6 month trial of all new street trading activities and advertise a poll for all to complete to understand if traders and the local community feel a market is viable in the area.

Non licensed local businesses

The suggested recommendations contained in the Strategy's draft may have an impact on some local companies if we introduce new street trade activities near their brick-and-mortar locations. Prior to adopting any form of street trading activity, we will conduct an assessment to verify that we are not in competition with the currently established outlets by selling similar commodities. We have committed to a 6-month trial of all new street trading operations and will publicise a poll for all to complete in order to determine whether traders and the local community believe a market is feasible in the area.

3. What research or consultation(s) have been carried out?

Benchmarking

Officers met with other local authorities such as Westminster, Lambeth, Tower Hamlets and Newham who have all recently delivered a new Markets Strategy within the last 18 months and reviewed the process, delivery of, and completed strategy documents. We also explored how they have followed up with post strategy delivery models. Interestingly none had held any

engagement post delivery to send check the impact or reception of strategy. This is something we will do differently and will set up focus groups bi annually to review impact and feedback on delivery and potential priority changes.

We also met with the London Markets Benchmarking Group and the Mayor of London's Market Board to review our previous strategy and proved vs all other London strategies to ensure it is concise, achievable and inclusive. We also used the opportunity to take a regional level view of the opportunities, risks and needs within the industry and overlay these across the current performance in Hackney to identify additional opportunities areas to improve and actions.

The service also used its relationship with national organisations such as NABMA and the NMTF to review previous strategies nationally with an understanding of what has worked well, what has not worked well and what not to do within the strategic delivery of a five year strategy plan. We also used the opportunity to take a national level view of the opportunities, risks and needs within the industry and overlay these across the current performance in Hackney to identify additional opportunities, areas to improve and actions.

A consultation pack will be designed and shared with all that have an active street trading or a shop front licence.

Individual traders could take part in four ways:

- A QR code will be created and placed on posters promoting the consultation that will take people directly to the consultation document. A copy of the document will be emailed to all active licence holders so they can provide input electronically, saving the Council significant costs and resources on paper consultation packs and to ensure licence holders receive their packs. The last consultation we did in 2019, we received over 50 enquiries from traders claiming that they did not receive their consultation packs. This process will mitigate this risk and is also a much greener and more effective way of working.
- Paper copies will be made available from the Markets Service Office to those licence holders that do not have access to wifi or an electronic device to complete the online survey.
- Online Survey – An exact replica of the paper survey will be created on the Council's 'Citizen Space' consultation hub, including links to all relevant consultation material. This will allow other stakeholders such as residents, traders associations, user groups to provide feedback if they wish.
- Attendance at drop-in sessions (Details to be confirmed once we know the dates that will cover the consultation period).
- During on-site engagement with traders by market staff (please see Drops in Sessions section for details)

Posters will be placed prominently across the market sites to inform traders and members of the public of the consultation and of the dates, times and locations of the drop-in sessions.

Reminder emails and face to face engagement visits by officers with our licence holders will also be commenced at regular intervals to ensure uptake is high and meaningful contributions are made during this cohort.

Drop-in sessions

There will be 6 drop-in sessions organised during the consultation period (6 weeks) for members of the public and licence holders at different times and days of the week to enable as many as possible to attend should they wish, with Market Officers present to discuss the proposed changes with traders and answer any questions that they may have. The team will record all questions and feedback from the drop in sessions separately which will be included in the consultation report.

The drop in sessions will be advertised in the Hackney Gazette and the Council's website (Citizen Space) and newsletter that is delivered to all residents and businesses within Hackney.

All representations received will be considered and placed in an appendix within the subsequent report recommending changes.

The proposed strategy will be finalised once the consultation process is complete in case there is feedback received that has not been covered in the current strategy proposal.

4. Equality Impacts

4 (a) What positive impact could there be overall, on different equality groups, and on cohesion and good relations?

Overall:

By implementing the proposed recommendations in the new Strategy, we will see the following positive impacts:

Traders:

The opportunity to grow the Markets Service by offering new trading opportunities and allow existing licence holders to grow their business by allowing them to have multiple licenses which in adherence to the LLAA Act 1990.

Encouraging new entrepreneurs to trade and test their product in street trading locations at a cheaper offering before investing and moving to a bricks and mortar premises.

Offering the homeless with an opportunity to trade and earn a living instead of trying to trade illegally.

Providing traders with skills and training to help them build resilience in their business including marketing and the use of social media, expanding opportunities using international and digital options, understanding data protection and cyber security and the benefits of using card readers.

Offering mental health and wellbeing sessions to support traders during challenging times such as cost of living crisis.

Establishing a trustworthy line of communication for traders by promoting inclusivity, fair opportunities, and enhancing social cohesion with the Council through the proposed Equality, Diversity and Inclusion strategy and social value action plan.

Officers:

Supporting officers with the necessary training and upgraded equipment in order to safely operate all our markets and street trading locations. All new recruits will receive the necessary training as part of their induction process.

Local residents/ businesses and customers from outside the borough

Road closures for all our markets to have a safer environment for our shoppers.

Competitive fees and charges allow traders to offer their products at value for money.

Niche products offered in Markets - Limited offering in shopping centres and bricks and mortar businesses.

An accessible and affordable hub to carry out daily/weekly shopping for the local community. The markets would also serve as a place for socialising and entertaining with family and friends.

Sustainable environment by encouraging customers to travel to our markets using public transport and by removing single use bags and packaging in all our street trading sites.

A safe environment for various equality groups by prioritising and recognising Hackney's diverse community and preserving its culture, leading to strengthening the good relations between the Council and the community.

4 (b) What negative impact could there be overall, on different equality groups, and on cohesion and good relations?

The Markets , Shop Front & Street Trading sites and businesses that operate them mirror the diverse demographics of our own communities within the London Borough of Hackney. Markets themselves are community and social hubs open to all of the above protected characteristics. They are a place in which residents, visitors and traders co exist without fear of discrimination and are fantastic examples of how to knit together the diverse and rich cultures and beliefs we have within the borough in singular locations.

The strategy seeks to invest in long term infrastructure, business and mental well being support for existing licence holders and to support the service in growing its commercial portfolio to

support positive regeneration, economic and local employment growth and supporting local residents starting their own businesses within the borough in which they reside.

The strategy proposes a number of actions to be undertaken that will require funding outside of simply increasing fees and charges for traders in the borough which could be unaffordable for some and then in turn have a negative impact on the cost or quality of goods and services currently provided to millions of residents and visitors every year. It seeks to ensure we build on the foundations set following the completion of the previous strategy to ensure continued growth and investment into social enterprise, young entrepreneurs and developing further the important social values our market sites hold and the positive impact they play within our diverse communities across the borough.

By delivering best in class cost effective services we will be able to continue to develop and grow our service provisions and offerings to the community to ensure all protected characteristics are welcome and supported whether they are a visitor or trader within the market's sites.

Failure to invest and support the borough's market services will result in reduced market occupancy and income generation and this in turn would be detrimental to the licence holders and 2200 businesses currently operating within the borough and ultimately would damage the offering of quality goods and services at affordable prices to local people. Research shows those in lower income groups use the markets daily in particular as an affordable way of shopping and managing the cost of living crisis.