

## F1457 A1 Equality Impact Assessment (EqIA) form

**N.B:** the completed form should be emailed to the [Diversity and Inclusion team](#)

<b>Policy</b>	Increase of penalty fare on TfL Services to £100 (£50 if paid within 21 days) – REF <b>D&amp;IC22419</b>
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	0.1	17/10/22	First draft
	0.1	10/09/22	Comments from Superuser JMF from IDAG
	0.2	17/10/22	Reviewed and Updated JPC
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	0.6	04/08/23	Reviewed and Updated JPC
	0.7	31/08/23	Reviewed and updated by JPC following feedback from TfL Legal (SG)
	1.0	09/11/23	Final version approved by MM

\* Delete as appropriate (the Accountable person should always be at least one management level higher than the Responsible person).

Project Related Documents	Doc No.	Document title	Relevant Section(s) of this Document
	N/A	N/A as not a project	

## Step 1: Clarifying Aims

### Q1. Outline the aims/objectives/scope of this piece of work

#### The Proposal

This Equality Impact Assessment assesses a proposal to increase the TfL penalty fare from £80 (or £40 if paid within 21 days) to £100 (or £50 if paid within 21 days) ("**the Proposal**").

In January 2023, penalty fares on National Rail services were increased to £100 **plus** the appropriate single fare to the destination being travelled to on that train. This amount is reduced by £50.00 if paid within 21 days. The Proposal would bring TfL into line with National Rail in this regard.

The Proposal is being considered for a number of reasons, including;

- to provide a more robust deterrent to fare evasion, including following increases in fares
- to restore the value of the penalty fare in real terms
- to have a co-ordinated approach to the control of fare evasion, with a consistent message that travelling without a ticket on any TfL service involves the risk of a £100 penalty fare as it does on National Rail services
- to aid recovery of lost revenue from fare evaders, and off-set more of the costs of ticket inspection and enforcement.

#### Penalty fares

Penalty fares are issued to customers who cannot evidence that they have paid the correct fare. They are issued instead of bringing a criminal prosecution for fare evasion. TfL's Revenue Enforcement and Prosecutions Policy provides that penalty fares may be issued in appropriate cases, and that each case is unique and will be considered on its own facts and merits. Penalty fares are issued on TfL's services by authorised members of staff.

TfL's website explains that if customers do not touch in and out correctly using contactless (card or device) or an Oyster card, or do not have a valid ticket, they may be charged a penalty fare. It explains that the ticket must cover their entire journey and all zones travelled in. If using [pay as you go](#), customers must have enough credit to pay for their entire journey. If using a mobile device, it must have enough battery to last the entire journey.

#### The importance of penalty fares

Penalty fares are used by rail networks across in many, if not all, countries to act as deterrent to fare evasion. By acting as an effective deterrent, they can help generate revenue that can be reinvested in the network and improve the quality of customer services. They can also have a role in helping to reduce crime and disorder, and issues arising in connection with this.

It is estimated that fare evasion on the TfL network costs over £130m of ticketing revenue per annum (2023 estimate).

#### When are penalty fares issued?

Penalty fares are issued to customers by authorised TfL staff; the penalty fare contains details of the amount payable; how it can be paid; and how to appeal. The next working day TfL issues a letter via post to the customer (or parent/guardian if the penalty fare was issued to a customer aged 16-18) at their home address confirming the details of the penalty fare issued and how to either pay or appeal this. Details as to these matters are also available on TfL's website and are summarised below. They can be paid on the day or later. If paid within 21 days then, under the Proposal, the amount of the penalty fare would be £50. If paid after 21 days, the amount would be £100. The appeals process is explained below.

TfL has some general principles as to how it approaches the issuing of penalty fares, which can generally be summarised as:

- TfL does not issue PFs to children under 13;
- Anyone 13+ is potentially liable for a penalty fare if they travel without valid ticket, and so are potentially affected by the Proposal (to increase the penalty fare);
- Penalty fares are not issued to passengers who may have learning difficulties or are otherwise vulnerable. Advice and guidance is given instead.
- Hostel residents travelling without a valid travel authority should only be issued a penalty fare if it can be confirmed that they are on the electoral roll.
- In deciding whether to issue a penalty fare, enforcement staff are instructed to weigh carefully all the relevant factors and circumstances of a situation, before deciding how to act in the best interests of Transport for London.
- Vulnerable and/or distressed passengers are never left without the means to complete their journey.

#### Payment of penalty fares

Penalty fares can be paid for at the time of issue, or subsequently. Payment can be made online, by telephone (call charges apply) or by post. This would remain the position should the Proposal be approved.

#### Appeals

If an individual is found to be liable for a penalty fare, they will be issued a penalty fare. The penalty fare provides the individual with details of the offence, a receipt for any monies paid, information on how to make payment and information on how to make an appeal. The appeals process provides individuals with the opportunity to challenge the decision to issue a penalty fare. There are three appeal stages whereby an individual can make an appeal against TfL's decision. Only one appeal stage may be engaged at any one time, i.e., a second stage appeal can only commence once the outcome of the first stage appeal has been decided. Unless directed otherwise, an appellant may only submit one set of correspondence per appeal stage. Therefore, once an appeal has been received no further correspondence will be considered until the outcome of the appeal has been communicated to the appellant. All appeals must be submitted in writing, via email or online where applicable. TfL advises that appellants request a certificate of postage or use recorded delivery when submitting an appeal via the post.

TfL takes non-payment of fares very seriously. Therefore, an appeal will only be allowed if:

- The original decision to issue a Penalty fare Notice was incorrect
- There is significant and relevant mitigation and evidence put forward by the appellant to justify discretion
  - For a penalty fare issued on a bus:
    - the appellant had no reasonable opportunity to purchase a fare
  - For a penalty fare issued on a train or tram;
    - there were no facilities available to purchase a fare at the station where the appellant began his or her journey;
    - there was a notice from TfL indicating that passengers may use the service at a particular station at a particular time without having a fare;
    - an authorised person gave permission or authorised the passenger to use the service at a particular station at a particular time without having a fare

If an appeal is successful and a penalty fare has been fully paid or part paid by the appellant, they will normally receive a full refund of the amount paid. However, under certain circumstances TfL may decide to retain the price of the minimum fare. No interim travel costs incurred will be refunded under any circumstances.

If an appeal is received within the stipulated timeframe and is unsuccessful, the value of the penalty fare will (using amounts under the Proposal) be reduced to £50 if paid within 21 days of the date of the letter rejecting the grounds of that appeal. An appellant will then be advised of a new timeframe a payment must be made within or a further appeal must be received by. If neither payment nor a further appeal is received within this new timeframe the penalty fare will revert to its original level of £100.

Reminder letters may be sent by TfL or other agencies engaged in administering the penalty fare scheme in order to ensure payment is received in a timely manner. If a penalty fare remains unpaid it will constitute a debt and TfL reserves the right to pass the details of individuals to a debt recovery agency or to consider cancellation of the PF and to prosecute instead.



## Q2. Does this work impact on staff or customers? Please provide details of how.

### Staff

If the Proposal is approved, there is not expected to be a significant impact on staff in terms of workload or process following implementation. There is no expectation that the number of appeals would increase and affect the workload of the appeals teams within TfL's contractor [Independent Revenue Collection and Support](#) or TfL's Investigation Appeals and Prosecutions Team. Following the last penalty fare increase in 2011 TfL saw a slight reduction in the volume of appeals but not material enough to affect workload volumes.

There is no evidence that shows increasing the value of the penalty fare results in an increase in violence against authorised officers issuing penalty fares. In addition, enforcement staff wear body worn video, which is proven to reduce staff assaults, have been trained in conflict management and regularly work in pairs. TfL's Authorised Officers who issue Penalty fares on the TfL Network will be briefed on the change and how to respond to any questions or complaints about the increase. TfL will closely monitor the impact on staff to mitigate any impact of the change on increased violence or aggression towards staff.

The penalty fare increase may also result in an increase in customer service enquiries to Transport for London and IRCAS. This will be mitigated by very clear customer information through communications and press activity, as well as supporting information on the websites.

### Customers

The Proposal will impact on TfL Customers who are issued a penalty fare. The impact will be of a financial nature. If this proposal is agreed, the amount payable by passengers issued a penalty fare will be increased by £20, from £80 to £100, or increased by £10, from £40 to £50, if paid within 21 days.

## Step 2: The Evidence Base

**Q3. Record here the data you have gathered about the diversity of the people potentially impacted by this work. You should also include any research on the issues affecting inclusion in relation to your work**

Consider evidence in relation to all relevant protected characteristics;

- Age
- Disability including carers<sup>1</sup>
- Gender
- Gender reassignment
- Marriage/civil partnership
- Other – refugees, low income, homeless people
- Pregnancy/maternity
- Race
- Religion or belief
- Sexual orientation

As a method of paying for travel on TfL services, latest data from 30 April 2023 – 27 June 2023, tells us 82.6 per cent were made using PAYG with contactless or Oyster card, or free via a concessionary card.

### Age

It will be seen from the below that the vast majority of Penalty fares issued by TfL are to adults over 18.

Penalty fares issued by TfL

Financial Year	Adult penalty fares Issued	%	Under 18 penalty fares Issued	%	Total penalty fares Issued	Total Passenger Journeys on TfL Services (in Millions) **
2022/23	31,580	70%	13,813	30%	45,393	3,252
2021/22*	20,277	74%	7,058	26%	27,335	2,482
2020/21*	2,360	81%	568	19%	2,928	1,287
2019/20	60,895	80%	15,295	20%	76,190	3,840
2018/19	73,228	83%	15,483	17%	88,711	3,999

\*Covid-19 pandemic impacted. \*\* Source - [Statista.com](https://www.statista.com) & [TfL Quarterly Performance Report Q4 22/23](#)

TfL does not collect data on the ages of PF recipients at a more granular level than this.

### *Concessionary travel*

Possession of passes/cards entitling the holder to free or reduced travel is higher among under-25s than all Londoners; it is particularly elevated for 11 to 15-year-olds with 74 per cent in possession of a free bus travel pass, although this is lower than the proportion observed in 2013/14 (83 per cent) This data reflects possession specifically, rather than use of passes/cards for free or reduced travel. Conversely, use of contactless options is lower among Londoners aged 16-24 than all Londoners (42 per cent of 16-24s, compared with 49 per cent of all Londoners)

Data from the Greater London Authority suggests that there are currently close to 580,000 Londoners between the current eligible ages for the 60+ concession of 60-66 years old. There are currently around 375,000 active 60+ Concession photocard holders. Taking into account evidence from London Travel Demand Survey data showing that 16% of all Londoners hold a Disabled Persons Freedom Pass, it is estimated that the take up of the 60+ Concession photocard among those who are currently of an eligible age who meet the eligibility criteria is close to 75%.

Data from 2019/20 shows that the majority of older Londoners (aged 65 or over) hold an Older Persons' Freedom Pass (92 per cent).



### Income

Data from Travel in London: Understanding our diverse communities 2019 says younger Londoners are marginally more likely to have a lower household income than all Londoners. Among Londoners aged under 25, thirty-two per cent have household income of less than £20,000, compared to twenty-eight per cent of all Londoners. Data from Travel in London: Understanding our diverse communities 2019 says Londoners aged 16-24 years old are more likely to be deterred from using public transport due to costs than Londoners as a whole. Data from Travel in London: Understanding our diverse communities 2019 says people on low incomes are also more likely to be older people. 24 per cent of those on low income are also 65+ and but also therefore are more likely to have an Older Persons' Freedom Pass. Data provided by data.london.gov.uk shows that children in London are more likely to be in poverty than adults. [Trust for London provides the following data on the proportion of Londoners in poverty after housing costs](#) in 2019/20 by age as:

0-4	35%
5-9	36%
10-14	41%
15-19	41%
20-24	23%
25-29	19%
30-34	27%
35-39	22%
40-44	24%
50-54	25%
55-59	23%
60-64	25%
65-69	27%
70-74	25%
75-79	25%
80-84	24%

### Other

[Age UK reports](#) that the over-75s are the age group least likely to use the internet and the study found that only 15 per cent of the nearly two million offline in this age group have an interest in getting online at all. Of all those who said they would like to use the internet more frequently or for more tasks, including those who are already online, a lack of IT skills was perceived to be the biggest barrier, with four-fifths (79 per cent) of over-75s citing this as a key factor.

Older people are more likely than other age groups to have dementia or cognitive impairments and may find using contactless / Oyster, touching in and out, more confusing, or may otherwise have difficulties in purchasing the correct ticket.

### Disability

#### *Concessionary travel*

Freedom Passes are the most common ticket type used on TfL services by disabled Londoners (66 per cent). Twenty-seven per cent of disabled Londoners use Oyster PAYG, a considerably smaller figure than non-disabled Londoners where the ticket is used by 61 per cent. Data from ticket types held in 2019/20 shows that disabled Londoners are more likely to hold an Older Persons' Freedom Pass (46 per cent compared with 13 per cent of non-disabled Londoners) and less likely than non-disabled Londoners to hold an Oyster card (19 per cent compared with 42 per cent of non-disabled Londoners). Seventeen per cent of disabled people hold a Disabled Persons' Freedom Pass [Note: the eligibility criteria for a Disabled Persons' Freedom Pass is different to the criteria to qualify as disabled within the meaning of the Equality Act 2010, with the former being stricter than the latter – meaning that some people who meet the definition of disabled within the meaning of the Equality Act 2010 may not be eligible for a Disabled Persons' Freedom Pass].



### *Income*

Trust for London evidence shows that 35 per cent of families in London including a disabled person were in poverty in 2019/20, compared to 25 per cent of families that did not include a disabled person. Data from Travel in London: Understanding our diverse communities 2019 says thirty-four per cent of disabled Londoners have household income of less than £10,000 compared with 10 per cent of non-disabled Londoners. 61 per cent of disabled people in London are on low income.

Households that include a disabled person are more likely to be in poverty than those who do not include a disabled person, as cited in the report – Travel in London: Understanding our diverse communities 2019. Disabled customers see cost, amongst other things, as a barriers to travel, as cited in the report – Travel in London: Understanding our diverse communities 2019.

### *Other*

Fifty-five per cent of disabled Londoners state that their disability affects their mobility.

### **Gender**

According to the 2011 Census, 51 per cent of Londoners are women. Women tend to complete more weekday trips on average than men (2.5 compared to 2.3). Walking is the most commonly used type of transport by women (95 per cent walk at least once a week). Women are more likely to use buses than men (62 per cent compared with 56 per cent) but are less likely to use other types of transport including the Tube (38 per cent women compared with 43 per cent men). Women are more likely than men to be travelling with buggies and/or shopping, and this can affect transport choices. Satisfaction with transport among women and men is very similar and is mainly driven by the ease of making the journey. Women are more likely than men to experience worrying incidents when travelling on public transport and are more likely to be deterred from using public transport more often by a number of different barriers. Use of the TfL website is equally high among women and men (both 89 per cent).

### *Income*

Differences exist between women and men in terms of employment and household income. Higher proportions of women say that they are currently not employed (20 per cent of women compared with eight per cent of men) and 71 per cent of Londoners aged 16 or over and not employed are women. More women than men are employed part-time (14 per cent of women compared with six per cent of men) and 70 per cent of Londoners working part-time are women. Women are more likely than men to have a low household income. Thirty-one per cent of women have an income of less than £20,000 per year compared with 26 per cent of men. This may be linked to the higher proportion of women being in part-time employment, retired or not working. Women get paid less than men on average. The median salary in 2016 for a woman in London was £26,277 compared with £36,761 for men. This is partly owing to the increased number of part-time positions occupied by women. Women occupy 70 per cent of part-time positions in the Capital. However, even when looking solely at full-time salaries there is still a discrepancy in the average annual pay for women and men; the median full-time annual pay for a woman in London is £32,151 compared with £39,927 for a man.

As cited in the report from Travel in London: Understanding our diverse communities 2019; at 55 per cent, women are more likely to be in a low-income household than men. As cited in the report from Travel in London: Understanding our diverse communities 2019, 20 per cent of women compared with 8 per cent of men are unemployed and 71 per cent of Londoners aged 16 or over and not employed are women. As cited in the report from Travel in London: Understanding our diverse communities 2019, women in London in full-time employment receive 24 per cent less in median full-time pay than their male counterparts.



The employment rate of women is affected by child dependency. Employment rates (noted in 2010) decline steadily from 78 per cent of women with no dependent children to 22 per cent of women with four or more dependent children. These family commitments also change the way in which women use public transport, affecting their travel patterns and behaviour.

### **Gender Reassignment**

Trans people face negative reactions to their gender identity in society and can become victims of hate crimes, domestic abuse, and harassment simply because of their gender identity. Trans people already have the right to legally change their gender. Since the Act came into force, 4,910 trans people have been issued a Gender Recognition Certificate. 12% of trans respondents to the National LGBT survey who had started or completed their transition had successfully obtained one, and 7% of those who knew about them but did not have or had not applied for one said they would not be interested in obtaining one.

No robust data on the UK trans population exists. We tentatively estimate that there are approximately 200,000-500,000 trans people in the UK. The Office for National Statistics is researching whether and how to develop a population estimate. There are no current data sources on gender identity in London or the UK as a whole. Research carried out in 2012 on the acceptability of gender identity questions in surveys provided an indicative estimate that 1 per cent of the UK population identify as trans. 41% of trans men and trans women responding to a Stonewall survey said they had experienced a hate crime or incident because of their gender identity in the last 12 months. They also found that 25% of trans people had experienced homelessness at some point in their lives. A national LGBT survey found similar results, with 67% of trans respondents saying they had avoided being open about their gender identity for fear of a negative reaction from others.

**Source:** [Geo LGGT factsheet - UK Gov publishing service](#)

One in four trans people (25 per cent) have experienced homelessness at some point in their lives. According to TfL's [Annual Diversity and Inclusion impact report 2019/20](#) it is not possible to accurately report the number of Londoners who would describe themselves as trans.

### **Marriage/civil partnership**

In 2020, there were 7,566 opposite-sex civil partnerships formed in England and Wales, of which 7,208 were registered in England and 358 were registered in Wales; this is the first year that civil partnerships between opposite-sex couples have been reported.

There were 785 civil partnerships formed between same-sex couples in England and Wales in 2020, of which 745 were registered in England and 40 were registered in Wales; this is the lowest number recorded for England since the introduction of civil partnerships in 2005.

Around three-quarters (73%) of same-sex civil partnerships formed in England and Wales in 2020 were to couples where both partners had never been in a marriage or civil partnership before; however, for opposite-sex partnerships, this was just over half (52%).

In 2020, the average (median) age at civil partnership for opposite-sex couples was 58.9 years for men and 56.3 years for women; for same-sex couples, the average ages at civil partnership were lower (49.8 years and 50.1 years respectively).

Less than one in five (19%) of those entering a same-sex civil partnership in England and Wales in 2020 were aged 65 years and over; in contrast, 29% of those entering an opposite-sex civil partnership were aged 65 years and over.

There were 671 same-sex civil partnership dissolutions granted in England and Wales in 2020, a decrease of 27% from 916 in 2019; of these, 54% were to female couples.

**Source** [ONS Gov.UK](#)

### **Other – e.g., refugees, low income, homeless people**

The socio-economic position of individuals is not a protected characteristic but is nonetheless an important factor affecting outcomes. Social class and income are linked to poverty and material deprivation.

**Social class:** Assessing London adults along the National Statistics Socio-economic Classification (NS-SEC), most households in London (52 per cent) are in the top two social classes, referring to managerial, administrative, and professional occupations. This has increased in recent years and is higher than the national proportion of 46 per cent. 27 per cent of London's households are in the bottom three social classes or are long-term workless, and 21 per cent are in intermediate occupations or are self-employed. The remaining 10 per cent are full-time students.



Income: Income inequality is higher in London than elsewhere in England. One measure of income inequality is the ratio of average to median income, after housing costs. This ratio is 34 per cent in London versus an England average of 25 per cent, although the gap between the two has closed in recent years. At a UK level, household income growth is stronger towards the bottom of the income distribution. In addition, the risk of poverty is greater in London: 27 per cent of the population, and 37 per cent of children, are in poverty. UK-wide reforms to welfare and tax since 2010 have had an impact on poverty, particularly among disabled and BAME individuals, as well as women. Generally, in the years since The Great Recession there has been a fall in living standards in the UK comparable to the 1980s recession and subsequent 1990s recovery.

Low income: The definition of 'low income' is imprecise since it is a relative concept in which household wealth depends on a number of factors, including household size and non-income related wealth. Twenty-eight per cent of Londoners can be classified as having a lower annual household income (below £20,000). In some cases, data for specific income groups is not available and socio-economic groups DE are used as a proxy. Those classified as DE live in households where the chief income earner is either in semi-skilled/unskilled manual work or is unemployed. Londoners living in lower income households (below £20,000) are more likely to be:

- Women (55 per cent compared with 50 per cent all Londoners)
- BAME people (44 per cent compared with 37 per cent all Londoners)
- Older people (24 per cent are aged over 65, whereas people in this age group make up 13 per cent of the total London population)
- Disabled people (20 per cent compared with nine per cent all Londoners)

Cost of living/Inflation: The proposed Penalty fare increase may disproportionately low-income customers subject to a penalty fare. This could exacerbate existing inequalities, limit access to opportunities, and hinder social mobility for these groups. The current cost-of-living crisis means those on low incomes may face challenges affording basic necessities like housing, healthcare, and education

UK Inflation is expected to fall further: Inflation has started to fall. It was over 11% in October last year (2022) and it was just under 8% in June this year (2023). We expect it to fall further to around 5% by the end of this year. Although the prices of some food products are likely to rise faster than this. An important reason we expect inflation to keep falling this year is because energy bills should come down more as gas prices have fallen a lot recently. Higher interest rates will also help to bring inflation down further. That's because they will reduce the amount of overall spending in the economy. We expect inflation to keep on falling in 2024 and reach our 2% target by early 2025. That means prices would still be rising, but they would be only rising gradually.

Source: [Bank of England 03/08/2023](https://www.bankofengland.co.uk/quarterly-bulletin/2023/03)

Homeless households and rough sleepers: There were an estimated 7,484 persons seen rough sleeping in London during 2017/18. In the same year, over 15,000 households were accepted as homeless by their local authority. Homelessness can often cause ill health, as well as exacerbating existing conditions, with the average age of death among people who are long-term homeless considerably lower than the general population.

Refugees and asylum seekers: This group face barriers to accessing the labour market, have poor health, and are particularly vulnerable to discrimination, social stigma, and poverty.

UK Armed Forces Veterans: There are 123,000 veterans living in Greater London. This group face challenges around employment, and are more likely to have a physical, sensory, or mental health condition than the wider population.

TfL offers a Veterans Oyster photocard if you:

- Receive ongoing payments under the [War Pensions Scheme](#) in your name. This includes widows, widowers, and dependants
- Receive Guaranteed Income Payment under the [Armed Forces Compensation Scheme](#) in your name. This includes widows, widowers, and dependants.



Ongoing payments are awarded to service personnel who've sustained a certain level of physical or psychological injury in the line of duty. If you received a one-off gratuity payment instead, you can't get a Veterans Oyster photocard. You also can't get a Veterans Oyster photocard if you live in a [London borough](#) and are eligible for a [60+ London Oyster photocard](#) or [Freedom Pass](#).

National Rail Veterans Railcard holders are also eligible for discounted travel on TfL rail services. To be eligible Veterans must have served for at least one day in HM Armed Forces (Regular or Reserve) or Merchant Mariners and have seen duty on legally defined military operations.

**People with experience of the criminal justice system:** London is home to 17 per cent of offenders and reoffenders in England and Wales, a total of 93,000 individuals. Ex-offenders often face challenges around financial security, employment, and housing, as well as being more likely to have a mental health condition.

Homeless persons or rough sleepers are not affected by this proposal as they will not have a valid Name & Address for the issue of a Penalty fare

### **Pregnancy/Maternity**

No significant impact is anticipated that would be relevant to pregnancy and maternity.

### **Race**

Ethnicity: GLA projections estimate that, in 2019, 57 per cent of Londoners have a white British, white Irish or other white ethnicity, with the remaining 43 per cent having a black, Asian or minority ethnicity (BAME).

Londoners account for 40 per cent of the London population

- Walking is the most commonly used type of transport by BAME Londoners. (96 per cent of BAME Londoners walk at least once a week compared with 95 per cent of white Londoners).
- After walking, the most commonly used type of transport by BAME Londoners is the bus (65 per cent BAME compared with 56 per cent white)
- Oyster pay as you go is the most common ticket used by Londoners on all types of public transport, regardless of ethnic group
- Barriers to increased public transport use are largely similar among BAME Londoners and white Londoners, but there are some barriers that are more likely to be mentioned by BAME Londoners
- BAME Londoners are more likely to be classified as 'worried' while using public transport and to have experienced a specific worrying incident in the past three months when travelling [
- In general, BAME Londoners give slightly lower overall satisfaction ratings than white Londoners for most transport types. This is likely to be related to the younger age profile, with lower satisfaction ratings traditionally given by younger customers compared with older customers
- Internet access is very similar for BAME Londoners and white Londoners (91 per cent BAME compared with 90 per cent white)

Higher proportions of BAME Londoners have an annual household income of below £20,000 (33 per cent) than white Londoners (25 per cent). There is substantial discrepancy between ethnic minority groups though, with the proportion that have an annual household income of less than £20,000 ranging from 27 per cent of mixed ethnicity Londoners up to 41 per cent of black Londoners.

### *Income*

BAME Londoners are more likely to live in low-income households, are likely to cite affordability as a barrier to transport and are more likely to use buses than the Tube. 44 per cent of BAME people are from a low-income household, as cited in the report from Travel in London: Understanding our diverse communities 2019, According to research on poverty by Joseph Rowntree Foundation, 35 per cent of people in London who identify as minority ethnic are in poverty. Additionally, further research shows that 54 per cent are Bangladeshi, 46 per cent are Pakistani and 42 per cent are Black. Comparatively, 19 per cent of people in London who identify as White are in poverty, which is the same percentage as the rest of the UK. 60 per cent of BAME Londoners say cost is a barrier to travel on public transport in London compared to 38 per cent of white Londoners, as cited in the report from Travel in London: Understanding our diverse communities 2019.



### *Other*

Travel in London: Understanding our diverse communities 2019 identifies that for some BAME Londoners language can be a significant barrier to public transport use, especially among people who were not born in the UK. Cultural and language issues can reduce confidence and access to information, thereby limiting the extent to which people make unfamiliar journeys and their ability to travel independently. Difficulties speaking English are more common among older Londoners. Two per cent of those aged between three and 15 do not speak English well compared with six per cent of 65-year-olds and over.

### **Religion/Belief**

Nearly half of London's residents, 48 per cent, give their religion as Christian. Muslims account for 14 per cent and all other religions total 12 per cent. People stating no religion make up the remaining 26 per cent. The proportion of Londoners who are Muslims or who have no religion has increased in recent years, while the proportion who are Christian has declined.

### **Sexual Orientation**

2 per cent of adult Londoners identify as gay or lesbian, higher than the UK rate of 1.3 per cent. A further 0.6 per cent identify as bisexual and 0.6 per cent as other sexual identities. A recent survey of the UK's LGBT population found that 40 per cent had experienced an incident such as verbal harassment or physical violence because they were LGBT, and that they had lower levels of life satisfaction than the general UK population.

## Step 3: Impact

**Q4. Given the evidence listed in step 2, consider, and describe what potential short-, medium- and longer-term negative impacts this work could have on people related to their protected characteristics?**

Protected Characteristic	Potential negative impact  Yes or No	Explain the potential negative impact
Age	Yes	<p>The proposed increase in the penalty fare (it will cost £20 more or £10 more if paid within 21 days) it may have a negative impact on low-income customers travelling on TfL services who are over the age of 13 (and therefore liable to be issued a penalty fare) and who incur a penalty fare. Younger people and older people who have incurred a PF may have more difficulty in affording the PF increase because they tend to be on lower incomes compared to other age groups.</p> <p>This negative impact is expected to be medium-term as inflation and costs of living pressure subside with inflation predicted to be below the Bank of England target of 2% by early 2025.</p> <p>However, the following may be less likely to be impacted by the PF increase because high levels of ownership of the identified concessions means they may be less likely to incur a PF in the first place: customers aged 13-15 (11-15 Zip Oyster); Londoners 16-18 (16-18 Zip Oyster); Londoners aged 60 or over (60+ Concession and Older Person's Freedom Pass).</p> <p>Older people who have incurred a PF may have more difficulty than other age groups in taking the necessary steps to pay the PF, because (i) they are less likely to have access to and or be able to use the internet; and (ii) they may have more difficulty in getting to a post box as they are more likely to have mobility issues. In addition, older people may have more difficulty in understanding the deadline for securing a reduced PF and or in understanding the appeal process. Given these potential difficulties for some, they may be more likely to be incur the increased PF of £100; but, as is noted above, there is discretion not to issue PFs in appropriate circumstances.</p>

		<p>These potential negative impacts would likely be long term but mitigated by actions set out in Step 6 below.</p>
<p><b>Disability including carers</b></p>	<p>Yes</p>	<p>The proposed increase may negatively impact disabled customers who incur a penalty fare.</p> <p>This is because disabled people may have more difficulty in affording the PF increase because they tend to be on lower incomes than non-disabled people. This is more likely to affect disabled customers not entitled to a Disabled Persons Freedom Pass (DPFP) travelling on TfL services, especially non-London residents. Disabled people with a Disabled Persons Freedom Pass (DPFP) are less likely to be impacted by the PF increase because ownership of the concession means they are probably less likely to incur a PF in the first place.</p> <p>Some disabled people including those with learning difficulties or cognitive impairments, may be more likely to inadvertently travel without the correct ticket (and be potentially liable for an increased PF) because they may be more easily confused as to ticketing.</p> <p>Some disabled people who have incurred a PF may have more difficulty than others in taking the necessary steps to pay the PF, because (i) they may be less likely to have access to and or be able to use the internet; and (ii) they may have more difficulty in getting to a post box they are more likely to have mobility issues. In addition, some disabled people with, for example, learning difficulties or cognitive impairment may have more difficulty in understanding the deadline for securing a reduced PF and or in understanding the appeal process. Given these potential difficulties for some, they may be more likely to be incur the increased PF of £100; but, as is noted above, there is discretion not to issue PFs in appropriate circumstances and that policy makes special provision for elderly and disabled customers (see above).</p> <p>These potential negative impacts would likely be long term but mitigated by actions set out in Step 6 below.</p> <p>Carers also may be negatively impacted as they do not receive concessionary or free travel and may be subject to a penalty fare.</p>





<b>Gender</b>	Yes	<p>The proposed increase in the penalty fare ( , may be more likely to have a negative impact on women rather than men, because women are generally more likely to be on low incomes.</p> <p>This potential negative impact would likely be medium-term as inflation and costs of living pressure subside with inflation predicted to be below the Bank of England target of 2% by early 2025.</p>
<b>Gender reassignment</b>	No	No known negative impact.
<b>Marriage/civil partnership</b>	No	No known negative impact.
<b>Other: –</b>		
<b>Refugees/Asylum Seekers, low income</b>	Yes	<p>The proposed increase is that it may be more likely to negatively affect these groups as they will be and or are more likely to be on low incomes.</p> <p>This negative impact would likely be medium-term as inflation and costs of living pressure subside with inflation predicted to be below the Bank of England target of 2% by early 2025.</p>
<b>Homeless/Rough Sleepers</b>		Not issued a penalty fare unless they have a verifiable address.
<b>UK Armed Forces Veterans</b>	No	TfL offers a Veterans Oyster photocard giving free travel at any time on TfL services, and so they are unlikely to be negatively impacted.
<b>Pregnancy/maternity</b>	No	No known negative impact.
<b>Race</b>	No	<p>BAME people who have incurred a PF may have more difficulty in affording the PF increase because they tend to be on lower incomes.</p> <p>Some BAME people who have incurred a PF may have more difficulty than others in taking the necessary steps to pay the PF, or in understanding the deadline for securing a reduced PF and or in understanding the appeal process. This is because some BAME people have English language difficulties. Given these potential difficulties for some, they may be more likely to be incur the increased PF of £100.</p> <p>These potential negative impact would likely be long term but addressed by actions set out in Step 6 below.</p>
<b>Religion or belief</b>	No	No known negative impact.





<b>Sexual orientation</b>	<b>No</b>	No known negative impact.
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**Q5. Given the evidence listed in step 2, consider, and describe what potential positive impacts this work could have on people related to their protected characteristics?**

While no specific positive impacts are identified below, penalty fares - by acting as an effective deterrent - can help generate revenue that can be reinvested in the network and improve the quality of customer services. They can also have a role in helping to reduce crime and disorder, and issues arising in connection with this. These can have positive consequences for customers generally.

<b>Protected Characteristic</b>	<b>Potential positive Impact  Yes or No</b>	<b>Explain the potential positive impact</b>
<b>Age</b>	<b>No</b>	No known positive impact.
<b>Disability including carers</b>	<b>No</b>	No known positive impact.
<b>Gender</b>	<b>No</b>	No known positive impact.
<b>Gender reassignment</b>	<b>No</b>	No known positive impact.
<b>Marriage/civil partnership</b>	<b>No</b>	No known positive impact.
<b>Other – e.g., refugees, low income, homeless people</b>	<b>No</b>	No known positive impact.
<b>Pregnancy/maternity</b>	<b>No</b>	No known positive impact.
<b>Race</b>	<b>No</b>	No known positive impact.
<b>Religion or belief</b>	<b>No</b>	No known positive impact.
<b>Sexual orientation</b>	<b>No</b>	No known positive impact.

**Step 4: Consultation**

**Q6. How has consultation with those who share a protected characteristic informed your work?**



List the groups you intend to consult with or have consulted and reference any previous relevant consultation? <sup>2</sup>	If consultation has taken place what issues were raised in relation to one or more of the protected characteristics?
<b>Secretary of State for Transport</b>	No issues were raised in relation to one or more of the protected characteristics. Supportive of the proposal. "Agrees that penalty fares set at an effective level, and with appropriate protections for passengers who receive one in error, remain an important tool for combating fare evasion on the transport network".
<b>London Councils</b>	Did not respond to the consultation.
<b>London TravelWatch</b>	The main issue raised in respect of one or more of the protected characteristics was a concern the proposal may disproportionately affect those on low incomes. Felt proposal does not reflect the impact of the current challenging economic climate on people travelling.
<b>Transport for All</b>	Did not respond to the consultation.
<b>Scope</b>	Did not respond to the consultation.
<b>Independent Disability Advisory Group</b>	The main issue raised in respect of one or more of the protected characteristics was relating to the potential impact on disabled users who are more likely to be on low income.
<b>The Independent Penalty Fare Appeals Panel</b>	No issues were raised in relation to one or more of the protected characteristics. Supportive of the proposal. "Aware that fares have not been increased for some time and we would support an increase to £100/50"
<b>Appeals Service (ITAL UK Ltd)</b>	No issues were raised in relation to one or more of the protected characteristics. Supportive of the proposal.
<b>Rail Delivery Group</b>	Did not respond to the consultation.
<b>Transport Salaried Staffs' Association (TSSA)</b>	Did not respond to the consultation.
<b>The National Union of Rail Maritime &amp; Transport Workers (RMT)</b>	Did not respond to the consultation.
<b>Unite the Union (Unite)</b>	No issues were raised in relation to one or more of the protected characteristics. "No comment on this save for the insuring the safety of staff collecting fares and the assurance of violence at work protection when collecting fares"
<b>Unison</b>	Did not respond to the consultation.
<b>London Assembly Members – Transport Committee</b> <ul style="list-style-type: none"> <li>• Siân Berry (Chair)</li> <li>• Caroline Pidgeon MBE (Deputy Chair)</li> <li>• Shaun Bailey</li> <li>• Elly Baker</li> </ul>	Did not respond to the consultation.

<sup>2</sup> This could include our staff networks, the Independent Disability Advisory Group, the Valuing People Group, local minority groups etc.



<ul style="list-style-type: none"> <li>• Unmesh Desai</li> <li>• Neil Garratt</li> <li>• Joanne McCartney</li> <li>• Keith Prince</li> <li>• Nick Rogers</li> <li>• Sakina Sheikh</li> </ul>	
<b>Age UK London</b>	Did not respond to the consultation.

**Q7. Where relevant, record any consultation you have had with other projects / teams who you are working with to deliver this piece of work. This is really important where the mitigations for any potential negative impacts rely on the delivery of work by other teams.**

N/A

## Step 5: Informed Decision-Making

**Q8. In light of the assessment now made, what do you propose to do next?**

Please select one of the options below and provide a rationale (for most EqIAs this will be box 1). Please remember to review this as and when the piece of work changes

<b>1. Change the work to mitigate against potential negative impacts found</b>	<p>A number of mitigations for protected groups exist and these have been reviewed and strengthened: -</p> <p>Revised guidance in TfL's Irregularity Procedures will be given to authorised officers for dealing with travel irregularities involving disabled customers (including those with hidden disabilities who inform the officer) to avoid the need for a penalty fare being issued where appropriate. This is achieved by allowing the customer to pay the correct fare for their journey and regularise the situation with advice, guidance, and assistance.</p> <p>TfL already operates significant discretion in allowing appeals and or cancelling penalty fares when representations are made in respect of disadvantaged persons and/or allowing instalment plan payment arrangements for those on low incomes. Revised guidance will also be given to penalty fare Appeals staff to allow customers who inform them of a disability to exercise greater discretion in cancelling penalty fares or allowing these to be paid by instalment.</p> <p>All customers on low income who need to pay their penalty fare in instalments will be allowed to do so.</p>
<b>2. Continue the work as is because no potential negative impacts found</b>	
<b>3. Justify and continue the work despite negative impacts (please provide justification)</b>	<p>The potential negative impacts of the proposal relate mainly to those on low income in some protected groups.</p>



	While the vast majority of passengers pay the correct fare for their journey, there is a small minority intent on defrauding the system. TfL needs to balance the needs of the protected groups with the benefit of having a credible penalty fare level in force which acts both as a credible deterrent and also as a penalty for those who do not pay their fare. This is to protect TfL fares revenue for all paying passengers, including those in protected groups so TfL can continue to invest in service improvements for all customers. In view of this, the reduction of the value and deterrent effect of the current level of penalty fares over time and through inflation, and also in view of the proposed mitigations identified above, it is considered that the proposed increase is a proportionate means of achieving a legitimate aim and is justified.
<b>4. Stop the work because discrimination is unjustifiable and no obvious ways to mitigate</b>	

## Step 6: Action Planning

**Q9. You must address any negative impacts identified in step 3 and 4. Please demonstrate how you will do this or record any actions already taken to do this. Please remember to add any positive actions you can take that further any positive impacts identified in step 3 and 4.**

Action	Due	Owner
Revised guidance in TfL's Irregularity Procedures will be given to authorised officers for dealing with travel irregularities involving disabled customers, including those with hidden disabilities e.g., learning difficulties or cognitive impairments etc. who inform the officer to avoid the need for a penalty fare being issued where appropriate. This is achieved by allowing the customer to pay the correct fare for their journey and regularise the situation with advice, guidance, and assistance.	December 2023	Delphine Bartouilh
Revised guidance will be given to PF payments and appeals handling staff to enable them to exercise discretion in cancelling penalty fares or allowing these to be paid by instalment when dealing with customers who; <ul style="list-style-type: none"> <li>○ inform them of a disability, learning difficulties or cognitive impairments etc.</li> <li>○ are older customers who are unable to or have no access to the internet, or who have mobility issues preventing them</li> </ul>	December 2023	Delphine Bartouilh







<p>getting to a post box or didn't understand the deadline for securing a reduced PF and/or trouble understanding the appeal process.</p> <ul style="list-style-type: none"> <li>○ are BAME customers who have English language difficulties which has led to a delay in payment or in understanding the deadline for securing a reduced PF and or in understanding the appeal process.</li> </ul>		
<p>TfL will monitor and review the equalities impact of the proposed change and will work to mitigate any negative impact on those with protective characteristics.</p> <p>This will be done through a review of penalty fare appeals or representations and any customer complaints to identify any potential themes and learning.</p>	<p>June 2024</p>	<p>John Conway</p>



## Step 7: Sign off

<b>Signed Off By</b>	<b>EQIA Author</b>	Delphine Bartouilh Appeals & Prosecutions Manager
	Signature: <i>Delphine Bartouilh</i>	Date: 17/10/2022
	<b>EQIA Superuser</b>	Jean Marc Feghali
	Signature:	(see feedback commentary in document)
	feedback sent by email	Date: 10/09/2022
	<b>Senior accountable person</b>	John Conway Senior Enforcement & Prosecutions Manager
	Signature: <i>John P. Conway</i>	Date: 09/11/2023
	<b>Diversity &amp; Inclusion Team Representative</b>	Name  Job Title
Signature	Date	



<b>2022 Consultation on proposal to increase the TfL penalty fare to £100/50 from £80/40</b>		
<b>Email sent by TfL consultation team to all consultees:</b>		 Stakeholder email penalty fares.docx
<b>Consultees</b>	<b>Response Received</b>	<b>TfL Response</b>
<b>Secretary of State for Transport</b>	 2022 01 23 SoS response on TfL prop	This response is supportive. No response required.
<b>London Councils</b>	No response received.	No response required.
<b>London TravelWatch</b>	 TfL Penalty Fares consultation respon   London TravelWatch feedba  London Travel Watch understands the importance of TfL tackling fare evasion but raised reservations regarding the rationale for the increase. They highlighted that the increase was disproportionate to TfLs fare level and raised that it could lead to unintended consequences of less income to TfL. London TravelWatch noted the importance of increased enforcement to tackle fare evasion on the network.	<p>We acknowledge the concerns raised about proportionality and the potential impact of an increase in the penalty fare on low-income customers especially in the current cost of living crisis.</p> <p>The disproportionality to fare levels for bus and tube journeys outlined in the response does not take into consideration the fact that often multiple journeys by a variety of different modes are made by TfL customers over the course of a day. Less than 1% of passenger journeys are ticket checked by officers and the percentage of penalty fares issued is very low compared to the number of journeys undertaken.</p> <p>TfL believe it is clearly in the interests of all passengers to tackle the high levels of fare evasion on the network by having a credible deterrent and penalty for fare evasion by increasing the level of the penalty fare.</p> <p>The level proposed is also considered reasonable when compared to other major cities.</p> <p>The current level of penalty fare (£80/40*) was implemented in January 2011 and if the penalty fare had been increased by the rate of inflation alone since 2011, we should be setting the increased penalty fare at £120. (£121.60 – based on average inflation of 3.46% from 2012-2023).</p> <p>We have however proposed introducing the revised penalty fare level of £100/50* having taken into account the current cost of living</p>



crisis and to ensure we align TfL's penalty fare with the current National Rail penalty fare to ensure consistency in the application of penalty fares to all customers travelling in London many of whom use both TfL and NR services.

\* discounted by 50% for prompt payment within 21 days

The level of the penalty fare set also needs to take into consideration the associated cost of issuing the penalty fare, handling appeals and debt chasing all of which has risen in line with inflation.

A number of mitigations for protected groups exist and these have been reviewed and strengthened: -

- TfL already uses discretion in allowing appeals and or cancelling penalty fares when justified based on representations made in respect of any disadvantaged persons and those sharing protected characteristics and/or allowing instalment plan payment arrangements for those on low incomes.
- Revised guidance in TfL's travel irregularity procedures will be given to authorised officers for dealing with travel irregularities involving disabled customers, including those with hidden disabilities e.g., learning difficulties or cognitive impairments etc. to avoid the need for a penalty fare being issued where appropriate. This is achieved by allowing the customer to pay the correct fare for their journey and by offering advice, guidance, and assistance.

Revised guidance will also be given to penalty fare payments and appeals handling staff to guide them in the exercise of their discretion to cancel penalty fares where appropriate and justified or allowing these to be paid by instalment when dealing with customers who;

- inform them of a disability, learning difficulties or cognitive impairments etc.
- are older customers who are unable to access, or have no access to, the internet, or who have mobility issues preventing them submitting representations by post or do not understand the deadline for securing a reduced penalty fare and/or have

difficulties understanding the appeal process.

- are customers who have English language difficulties which has led to a delay in payment or difficulty in understanding the deadline for securing a reduced penalty fare and or in understanding the appeal process.

All customers on low income who need to pay their penalty fare in instalments will be allowed to do so.





TfL has also invested in technology e.g., Irregular Travel Analysis Platform (ITAP) - a system which identifies fare evasion from anomalous journey patterns and sales data and other methods e.g., Max Fares – where we cannot identify the right fare for the journey (due to the customer failing to tap in/out), we charge the maximum fare (up to £9.40 in Zones 1-9. up to £26.00 beyond Zone 9, including on the Heathrow Express) to drive down fare evasion.

TfL also has ambitious plans, as outlined below, to reduce the level of fare evasion on its network with the aim of reducing fare evasion from the current high of 4.5% to 1.5% by 2030.

#### Plans

- Compliance, Policing, Operations and Security Director given clearer accountability for fare evasion (strategy, approach, and performance).
- Re-purposed Revenue Protection Programme steering group and programme.
- Theoretical framework for understanding types of fare evasion and interventions and calculating revenue loss.
- New methodology for measuring fare evasion.
- Improvement to scorecard reporting for fare evasion.
- New CompStat performance meeting and intelligence led tasking process.
- Development of strategic plan and governance arrangements.
- Strengthening enforcement activity and sanctions: more targeted enforcement through better use of data.
- Agreement for Transport Support & Enforcement (TSE) Officers to routinely work on London Underground paid side and deal with chronic fare evasion (pushing through Wide Aisle Gates, jumping

		<p>barriers).</p> <ul style="list-style-type: none"> <li>▫ More police support and joint exercises.</li> <li>▫ Recruitment of Revenue Control Inspectors (RCIs) and TSE Officers.</li> <li>▫ Cancelling of unpaid penalty fares and prosecuting offences.</li> <li>▫ SMART Stations Trial at Willesden Green –use of Artificial Intelligence (AI) on larger scale is an opportunity to improve data, detection, and responses.</li> <li>▫ Secured investment for proof-of-concept trials –Wide Aisle Gates, Contactless Payment Card look up facility for ticket checks.</li> </ul> <p><u>Implementation</u></p> <ul style="list-style-type: none"> <li>▫ Implement strategic plan and governance to drive improvements across all areas (including modal plans).</li> <li>▫ Discovery project (Contactless Payment Card look-up on Inspectors hand-held device) and run Proof of Concept Wide Aisle Gate project to assess impact and feasibility for wider rollout.</li> <li>▫ Tightening up operator franchise agreements on revenue protection (outcomes and performance outputs).</li> </ul> <p><u>Data</u></p> <ul style="list-style-type: none"> <li>▫ Improve data and analytics to inform future investment decisions / interventions, prioritisation, and evaluation.</li> <li>▫ Investment in Irregular Travel Analysis Platform (ITAP) version 4 and assessing case for changing survey methodology.</li> </ul> <p><u>Enforcement</u></p> <ul style="list-style-type: none"> <li>▫ Establish pan-TfL revenue investigations team in Compliance, Policing, Operations and Security Directorate increasing capacity and coverage to target persistent offenders.</li> <li>▫ More effective management of persistent offenders (with police).</li> </ul> <p><u>Behaviour Change</u></p> <ul style="list-style-type: none"> <li>▫ Working with CCT on stronger messaging and more targeted communications.</li> <li>▫ Learning from other cities and behaviour change expertise.</li> </ul>
<b>Transport for All</b>	No response received	No response required.
<b>Scope</b>	No response received	No response required.

<b>Independent Disability Advisory Group</b>	 2022 11 10 IDAG Meeting minutes - F (see item 4)	
<b>The Independent Penalty Fare Appeals Panel</b>	 2022 11 08 Independent Appea	This response is supportive. No response required.
<b>Appeals Service (ITAL UK Ltd)</b>	 2022 12 13 Response from Appo	This response is supportive. No response required.
<b>Rail Delivery Group</b>	No response received	No response required.
<b>Transport Salaried Staffs' Association (TSSA)</b>	No response received	No response required.
<b>The National Union of Rail Maritime &amp; Transport Workers (RMT)</b>	No response received	No response required.
<b>Unite the Union (Unite)</b>	 FW_ _EXTERNAL_ TfL_ Penalty Fares fo	There is no evidence to show that increasing the amount of the TfL penalty fare will lead to an increase in violence or assaults toward authorised officers. This didn't materialise during the last much larger increase (from £50 to £80/£40) in 2012.
<b>Unison</b>	No response received	No response required.
<b>London Assembly Members</b> – Transport Committee • Siân Berry (Chair) • Caroline Pidgeon MBE (Deputy Chair) • Shaun Bailey • Elly Baker • Unmesh Desai • Neil Garratt • Joanne McCartney • Keith Prince	No response received	No response required.

• Nick Rogers • Sakina Sheikh		
<b>Age UK London</b>	No response received	No response required.