

# Short Equality Impact and Outcome Assessment (EIA)

**EIAs make services better for everyone and support value for money by getting services right first time.**

EIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then action plan to get the best outcomes for staff and service-users<sup>1</sup>. They analyse how all our work as a council might impact differently on different groups<sup>2</sup>. They help us make good decisions and evidence how we have reached these decisions<sup>3</sup>.

See end notes for full guidance. Either hover the mouse over the end note link (eg: ID No.<sup>6</sup>) or use the hyperlinks ('Ctrl' key and left click).

**For further support or advice please contact the Communities, Equality and Third Sector Team on ext 2301.**

## 1. Equality Impact and Outcomes Assessment (EIA) Template

First, consider whether you need to complete an EIA, or if there is another way to evidence assessment of impacts, or that an EIA is not needed<sup>4</sup>.

<b>Title of EIA<sup>5</sup></b>	Cycle Hangars	<b>ID No.<sup>6</sup></b>	EEC32
<b>Team/Department<sup>7</sup></b>	City Transport		
<b>Focus of EIA<sup>8</sup></b>	<p><b><u>Background/Reason for the project</u></b></p> <p>It is only recently that council and national policy has required developers to provide cycle parking as a standard for all new residential housing. This means that storage of bicycles in older properties, existing flats or houses of multiple occupancies are a significant challenge to residents in the city who wish to own or store a bicycle. The city also suffers from a high level of bike theft and vandalism due to lack of safe, secured and covered facilities for residents. Local Transport Note 01/20 Cycling Infrastructure Design, released in July 2020, states that "Cycle parking is integral to any cycle network, and to wider transport systems incorporating public transport. The availability of secure cycle parking at home, the end of a trip or at an interchange point has a significant influence on cycle use". Therefore, the provision of high-quality secure cycle parking is a key determinant of whether people will choose to cycle or not.</p> <p>Funding has been secured for an initial rollout of 100 cycle hangars to be installed across the city.</p>		

**Who is affected by the service, or how it is delivered?**

The cycle hangars project will provide residents across the city with the opportunity to park their bikes in locked units. Each unit can hold up to six bikes. Residents, and businesses will be affected by the project. Some residents parking bays may be removed to accommodate the hangars. Disabled parking bays will not be removed unless there is evidence that they are underutilised by disabled users. In the unlikely event that disabled parking bays are proposed to be repurposed for the installation of cycle hangars, their usage will be thoroughly researched by the parking infrastructure team prior to this.

Initially the hangars will mainly be used by residents. We may work with businesses in future after the initial rollout of 100 to potentially provide them with cycle hangars to assist their business models if relevant.

Providing secure cycle parking potentially encourages cycle use, which delivers health and wellbeing benefits and reduces demands on the health service. Encouraging cycle use could reduce the number of motorised vehicles travelling in the city, making roads safer for pedestrians and other cyclists. People who may not be able to afford bicycles and therefore may not benefit directly from this scheme are likely to walk and use public transport more than an average person and tend to live in more congested areas. As a result, they would benefit positively from safer streets, improved air quality and reduced congestion due to lower levels of motor traffic, which better provision for cyclists might bring.

Equality will be considered throughout the process of identifying and implementing the cycle hangars through the following aspects:

- As part of the identification of potential locations for cycle hangars an evidence-based prioritisation process was undertaken to assess where there is the greatest need and the greatest benefit to residents. The process used datasets such as Indices of Multiple Deprivation Health and Disability. The subsequent top 20 location recommendations will be referred to when prioritising the bike hangar locations.
- An online survey was carried out in October/November 2021 in order for residents to suggest locations for the cycle hangars. Following this a prioritisation matrix system will be used to identify the initial 100 locations. The matrix will incorporate findings from the survey and the above data sets along with other set criteria such as type of property. Equalities questions were not asked as part of the survey.
- It is likely that some of the cycle hangars will be provided with spaces for non-standard cycles (including those used by families, disabled users and others who need adapted cycles) to enable all users to access this provision – the requirement for this was stipulated in the tender documents for procuring a supplier of the cycle hangars.

Due to vehicle parking spaces potentially being repurposed for the cycle hangars to be installed, most cycle hangar locations are likely to be subject to a Traffic Regulation Order (TRO) before the cycle hangar is installed. This will give residents on the roads where we are intending to install the hangars the opportunity to look at the planned locations and comment. If a TRO is not needed, residents on the affected roads will still be consulted on the plans before the cycle hangars are installed.

**How does it fit with other services?**

The project fits with other transport policies and services such as:

- Active travel fund
- Local Cycling and Walking Infrastructure Plan (LCWIP)
- Capability fund
- Access to education/employment
- Cycle lanes & Cycle Training
- Low Traffic Neighbourhoods (LTNs)
- General cycle parking
- School Travel Plans & School Streets
- Cargo bike accelerator project
- Local Transport Plan 5

Other teams from BHCC that will be involved in the project are the Parking Team, Housing Team, Highways, Transport Policy & Strategy Team, Transport Administration & Research Team, Business Development & Compliance Team, Traffic Team, Procurement Team, Community Engagement Team, and the Legal Services Team.

External Stakeholders include: NSL parking enforcement, Project Centre, Hanover Community Centre, Falco, Cyclepods, Ditchling Rise And Residents Association (DRARA) and Possability People.

**Who implements the project?**

The Transport Projects & Engineering Team will be project managing the cycle hangars project. Initially approximately 100 cycle hangars are being planned, more may be installed in future depending on future funding being secured. A procurement process has been carried out to find an external contractor to supply, install and manage the spaces in the cycle hangars, as well as maintaining them. The project may be brought in-house in future once the project is well established, following an initial contract of 2 years with the external contractor.

**Who are the external and internal service-users, groups, or communities?**

All residents, of Brighton and Hove will be able to apply for a space in a cycle hangar once they are installed and a system is set up for allocating spaces within the hangars. Employees of BHCC that are also residents in the city will be able to apply for a space if they choose to.

**Outcomes**

One of the outcomes in the Council's Plan is to deliver a 'sustainable city', and as part of this, a transport network that ensures Brighton & Hove becomes carbon neutral by 2030 and keeps the city moving. With a focus on providing cycle parking infrastructure the project will help meet the corporate priority of developing a sustainable and active travel network as follows:

- encouraging mixed mode travel with good transport interchanges and better integration of travel information.

	<ul style="list-style-type: none"> <li>delivering a transport system that provides sustainable travel with investment in walking, cycling and smart traffic signalling.</li> </ul> <p>Supporting and encouraging people to own and use a bicycle will also help the city to be a 'healthy and caring' place; one where healthy life expectancy is increasing through the promotion of physical activity and health inequalities are reducing.</p> <p>Cycle storage will be easier for residents where the cycle hangars are located. Having secure cycle parking near residents' homes therefore encourages cycle usage.</p> <p><b>Objectives</b></p> <p>The aim of the project is to encourage modal shift in line with the LTP 5, LCWIP and to help towards BHCC becoming a carbon neutral council by 2030, to reduce issues for residents such as cycle theft, cycle storage space, and to support the use of cycling as a mode of transport.</p> <p>Replacement of car parking with cycle parking would be a benefit of the project in terms of encouraging cycling and helping modal shift away from the car. The scheme has the potential to benefit residents of housing estates, shared flats and those without outdoor space, and for disabled cyclists who may want easy access for their bicycle.</p> <p>A further benefit may be the improvements to the overall street scene, with the reduction of bike storage in front gardens, lamp posts and near-by railings.</p>
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<p><b>Assessment of overall impacts and any further recommendations<sup>9</sup></b></p>	
<p>As the cycle hangar project is a new scheme for BHCC, we do not have any local, specific research or data to show the positive or negative impacts that the cycle hangars could have on specific groups. Therefore, the overall impacts are as follows:</p> <p><b>Disability:</b> Cycle parking provision has the potential to have a positive impact on the community. Increasing cycling has both direct and indirect health benefits which impact not only an individual that cycles (through better fitness and improved mental health) but also the wider community, (through better air quality, less noise pollution, reduced road danger, etc.). The cycle hangar spaces will be available for all residents to apply for. The units can be adapted to accommodate large, adapted bikes, such as those used by disabled cyclists, as well as for bikes with child seats on them and cargo bikes which parents may use for carrying children. These may therefore benefit disabled people.</p> <p><b>Gender:</b> Carefully selected locations that are well lit and overlooked and centrally located, will ensure that the environment is well considered to ensure all users of the hangars feel safe when getting their bicycles in and out.</p> <p><b>Age:</b> The scheme is intending to broaden the demographic of cyclists, in particular where users may need to repeatedly carry cycles up or down stairs the scheme should have a positive impact. The elderly tend to be less physically active – cycling provides a cheap form of transport and a simple form of physical exercise. The hangars are designed to accommodate any type of bicycle, inclusive of all the age groups.</p>	

**Economic:** In the Department for Transport's report, "The value of cycling" (Raje F. and Saffrey A. 2016. University of Birmingham and Phil Jones Associates) typical benefits of providing a secure cycle storage or bike hanger scheme were identified:

- Strategic economic benefits: High-density, cycle-friendly improvements to urban streetscape is conducive to achieve agglomeration benefits, although evidence in relation to regeneration and residential property effects is mixed
- Individual benefits: Evidence for individual benefits accruing from a specific investment is mixed, acknowledging the link between hard and soft measures to deliver individualised benefits that address underlying structural barriers to cycling
- Employment benefits: Both as an enabler of access to employment and education for transport-deprived residents, and as a means of attracting and retaining skilled labour and inward investment with lower staff absenteeism and turnover
- Local economic benefits: Increased retail spend density. Per sqm, parking provision for cycles generates 5x more retail spend than car parking (Lee A, and March A. (2010) 'Recognising the economic role of bikes: sharing parking in Lygon Street, Carlton'. Australian Planner. 47(2), 85–93)
- Public expenditure benefits: Typically low cost, high benefit, reduced spend on healthcare and school travel, and the potential of existing infrastructure, particularly if targeted at new cyclists
- Fiscal benefits: Increased revenues arising from agglomeration benefits, and specifically potential to reduce the opportunity cost of car parking space by giving more people access to on-street parking.

<b>Potential issues</b>	<b>Mitigating actions</b>
<p>Most cycle hangar units will be installed on the carriageway, replacing vehicle parking. They are approximately the same size as a standard car, therefore installing them in vehicle parking spaces should not cause visibility or obstruction issues for disabled people. Some may be placed in other areas such as on housing estates or on footway buildouts, in which case visibility and obstruction would need to be considered.</p> <p>There will be a fee for using the hangars and this might have a potentially negative impact on people of lower socioeconomic status.</p>	<p>Early engagement with disabled groups such as the RNIB and Possability People explaining the project and discussing any potential issues. Send the designs for each location to these groups before installation for their comment. Use standard guidelines for installing structures on the highway or footway.</p> <p>The fee is necessary to deliver desired level of service. If a space in the bike hangar will enable some people to rely on cycling as a main mode of transport it will provide a significant financial saving on alternative modes of transport. Review the impact the fee has on users and potentially introduce a sliding scale for fees, based on users income in future years.</p>

**Actions planned<sup>10</sup>**

**Consultations** – Once cycle hangar locations are decided upon they will be subject to statutory consultation in the form of Traffic Regulation Orders (TROs). Letters with the location plans will also be sent to residents and stakeholder groups before the TRO is advertised. Alternative formats of any documentation used in any consultations will be available upon request (such as audible copies for blind people) as well as being made available in different languages.

**EIA sign-off:** (for the EIA to be final an email must sent from the relevant people agreeing it or this section must be signed)

**Lead Equality Impact Assessment officer: Michelle Jamieson      Date: 12/01/2022**

**Communities, Equality Team and Third Sector officer: Janice Markey      Date: 14/01/2222**

## Guidance end-notes

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<sup>1</sup> The following principles, drawn from case law, explain what we must do to fulfil our duties under the Equality Act:

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately in their work.
- **Timeliness:** the duty applies at the time of considering policy options and/or before a final decision is taken – not afterwards.
- **Real Consideration:** the duty must be an integral and rigorous part of your decision-making and influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.
- **No delegation:** the council is responsible for ensuring that any contracted services which provide services on our behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty. It applies when a policy is developed/agreed, and when it is implemented/reviewed.
- **Proper Record Keeping:** to show that we have fulfilled our duties we must keep records of the process and the impacts identified.

NB: Filling out this EIA in itself does not meet the requirements of the equality duty. All the requirements above must be fulfilled or the EIA (and any decision based on it) may be open to challenge. Properly used, an EIA can be a tool to help us comply with our equality duty and as a record that to demonstrate that we have done so.

### <sup>2</sup> Our duties in the Equality Act 2010

As a council, we have a legal duty (under the Equality Act 2010) to show that we have identified and considered the impact and potential impact of our activities on all people with 'protected characteristics' (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership).

This applies to policies, services (including commissioned services), and our employees. The level of detail of this consideration will depend on what you are assessing, who it might affect, those groups' vulnerability, and how serious any potential impacts might be. We use this EIA template to complete this process and evidence our consideration.

**The following are the duties in the Act. You must give 'due regard' (pay conscious attention) to the need to:**

- **avoid, reduce or minimise negative impact** (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- **promote equality of opportunity.** This means the need to:
  - Remove or minimise disadvantages suffered by equality groups
  - Take steps to meet the needs of equality groups
  - Encourage equality groups to participate in public life or any other activity where participation is disproportionately low
  - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- **foster good relations between people who share a protected characteristic and those who do not.** This means:
  - Tackle prejudice
  - Promote understanding

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<sup>3</sup> EIAs are always proportionate to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The numbers of people affected
- The size of the likely impact
- The vulnerability of the people affected

The greater the potential adverse impact of the proposed policy on a protected group (e.g. disabled people), the more vulnerable the group in the context being considered, the more thorough and demanding the process required by the Act will be.

<sup>4</sup> **When to complete an EIA:**

- When planning or developing a new service, policy or strategy
- When reviewing an existing service, policy or strategy
- When ending or substantially changing a service, policy or strategy
- When there is an important change in the service, policy or strategy, or in the city (eg: a change in population), or at a national level (eg: a change of legislation)

Assessment of equality impact can be evidenced as part of the process of reviewing or needs assessment or strategy development or consultation or planning. It does not have to be on this template, but must be documented. Wherever possible, build the EIA into your usual planning/review processes.

**Do you need to complete an EIA? Consider:**

- Is the policy, decision or service likely to be relevant to any people because of their protected characteristics?
- How many people is it likely to affect?
- How significant are its impacts?
- Does it relate to an area where there are known inequalities?
- How vulnerable are the people (potentially) affected?

If there are potential impacts on people but you decide not to complete an EIA it is usually sensible to document why.

<sup>5</sup> **Title of EIA:** This should clearly explain what service / policy / strategy / change you are assessing

<sup>6</sup> **ID no:** The unique reference for this EIA. If in doubt contact Clair ext: 1343

<sup>7</sup> **Team/Department:** Main team responsible for the policy, practice, service or function being assessed

<sup>8</sup> **Focus of EIA:** A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Assessment (EIA)'



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This section should explain what you are assessing:

- What are the main aims or purpose of the policy, practice, service or function?
- Who implements, carries out or delivers the policy, practice, service or function? Please state where this is more than one person/team/body and where other organisations deliver under procurement or partnership arrangements.
- How does it fit with other services?
- Who is affected by the policy, practice, service or function, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? Eg: what do you want to provide, what changes or improvements, and what should the benefits be?
- What do existing or previous inspections of the policy, practice, service or function tell you?
- What is the reason for the proposal or change (financial, service, legal etc)? The Act requires us to make these clear.

<sup>9</sup> **Assessment of overall impacts and any further recommendations**

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Explain what positive impacts will result from the actions and how you can make the most of these.
- Countervailing considerations: These may include the reasons behind the formulation of the policy, the benefits it is expected to deliver, budget reductions, the need to avert a graver crisis by introducing a policy now and not later, and so on. The weight of these factors in favour of implementing the policy must then be measured against the weight of any evidence as to the potential negative equality impacts of the policy,
- Are there any further recommendations? Is further engagement needed? Is more research or monitoring needed? Does there need to be a change in the proposal itself?

<sup>10</sup> **Action Planning:** The Equality Duty is an ongoing duty: policies must be kept under review, continuing to give ‘due regard’ to the duty. If an assessment of a broad proposal leads to more specific proposals, then further equality assessment and consultation are needed.

