

Equality Impact and Outcome Assessment (EIA) Template - 2019

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-users¹. They analyse how all our work as a council might impact differently on different groups². They help us make good decisions and evidence how we have reached these decisions³.

See end notes for full guidance. Either hover the mouse over the end note link (eg: Age¹³) or use the hyperlinks ('Ctrl' key and left click).

For further support or advice please contact:

- **BHCC: Communities, Equality and Third Sector Team on ext 2301**
- **CCG: Engagement and Equalities team (Jane Lodge/Debbie Ludlam)**

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 needed⁴.

Title of EIA⁵	Active Travel Fund – Tranche 2 – A23 Phase 1	ID No.⁶	EEC55
Team/Department⁷	City Transport - Transport Projects & Engineering		
Focus of EIA⁸	<p>Brighton & Hove City Council's (BHCC) Transport Projects Team are undertaking a project to improve the Active Travel Infrastructure on the A23 between Preston Circus to the south and Preston Drove Junction to the north. Active Travel Infrastructure refers to physical highways infrastructure that is aimed towards modes of transport such as walking and cycling, for example Cycle Lanes and Footways/Pavements.</p> <p>This project's deliverables will likely have an impact on all users of the A23 and will benefit those that use Active Travel i.e., walking, wheeling and cycling the most, as safer and more user-friendly infrastructure is implemented. Further benefits are expected to be realised by local residents and the wider community via a reduction in harmful emissions and traffic volumes/noise/vibrations as it is</p>		

hoped that by providing improved active travel infrastructure, those who are able to benefit from the changes will choose to do so thus reducing reliance and volumes of motor vehicles.

Formal consultation and engagement sessions have taken place across the scheme on the designs, including:

- Initial concepts consultation in spring 2021 via an online portal for all Active Travel Tranche 2 schemes
- Face to face consultation with residents and stakeholders on the preliminary designs in December 2021
- Notification of drainage and CCTV surveys in December 2022
- Engagement with stakeholders on the detail of the design in Spring 2023

Following analysis of feedback, subsequent changes to design have been implemented where possible to make the scheme as beneficial to the highest number of people as possible. This includes but is not limited to, a discontinuation of a bus border arrangement to provide better pedestrian priority and reduce conflicts, the introduction of more formal signalised crossings to reduce safer crossing distances and, widening, where possible of cycle lanes to improve accessibility for all cycles i.e. adapted.

During the construction phase, the project may temporarily negatively affect some groups of people. These include: local residents that may be affected by noise and vibration, vehicular users of the A23 who may have their journey times extended, pedestrians who may have to use alternative routes as footways are altered, cyclists who may have to use the carriageway or another route as cycle lanes are altered and bus passengers who may experience longer than usual journeys as lane widths are reduced to accommodate contractors and their plant safely.

Early engagement with the contractor during the mobilisation phase will try to minimise any impacts. These will include:

- Warning signs to give notice of disruption.
- Letters to affected household and businesses to explain the project and give dates of any road closures etc.
- Online website (available by post, if requested) providing regularly updated information
- Alternative options provided for pedestrians and cyclists where safe and practical to do so.
- Social media updates
- Contact details available for enquiries and prompt response to any concerns.

2. Update on previous EIA and outcomes of previous actions⁹

What actions did you plan last time? (List them from the previous EIA)	What improved as a result? What outcomes have these actions achieved?	What <u>further</u> actions do you need to take? (add these to the Action plan below)
(This document is the initial Equality Impact Assessment). A draft was initially produced for the wider Active Travel programme but this was not specific to this design phase.	n/a	n/a

3. Review of information, equality analysis and potential actions

Groups to assess	What do you know ¹⁰ ? Summary of data about your service-users and/or staff	What do people tell you ¹¹ ? Summary of service-user and/or staff feedback	What does this mean ¹² ? Impacts identified from data and feedback (actual and potential)	What can you do ¹³ ? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age¹⁴	<p>Residents of Brighton & Hove:</p> <p>41,735 0-15yrs (15%) 196,394 16-64yrs (71%) 38,978 65+ yrs (14%) including over 6% aged over 75.</p> <p>The city's population is predicted to get older, with the greatest projected increases by broad age band in the 60-69 years and 80-84 years categories.</p> <p>Brighton and Hove has a very different age profile compared to the South East and England.</p> <ul style="list-style-type: none"> - Fewer children aged 0 to 15 years (15%) – South East (19%), England (19%) - More working age adults aged 16 to 66 (72%) – South East (64%), England (65%) 	<p>Walking and wheeling are a free and accessible form of active travel that promotes health and wellbeing. Active travel can be part of a longer journey via train or bus. All people are pedestrians at some point of any journey that is made.</p> <p>Dedicated cycle lanes make it safer and easier for children to cycle to school.</p> <p>E-bikes provide an opportunity to get older people cycling.</p> <p>Opportunities for cycling, wheeling, and walking facilities near schools and nurseries are important, as this makes spaces more inclusive for diverse people – adults, children and families.</p> <p>Increased congestion and/or removal of parking spaces</p>	<p>It is important to create a safe environment for families travelling to school and around these settings.</p> <p>Children, younger people, and older people need a safer crossing environment to enable them to walk more easily, safely, and independently.</p> <p>Children, younger people, and older people need cycling infrastructure to be suitable to enable them to have the opportunity to cycle.</p> <p>If scheme transport measures only focus on enabling safe commuter trips, this is less likely to support older and younger people to safely reach their key destinations (e.g. schools, retail centres, healthcare settings)</p>	<p>Identify and create opportunities to reallocate road space near schools to facilitate active travel and support walking and wheeling to school.</p> <p>Work with local charities / organisations supporting older and disabled people such as BHCC Public Health colleagues and Age Concern etc to travel more actively, and safely.</p> <p>Utilise government funding secured for school transport and travel demand management to provide additional, safe public transport options for all children, including those from minoritised groups (for example, Black and Racially Minoritised, faith community, Gypsy,</p>

	<p>- Fewer older people aged over 66 (13%) – South East (17%), England (16%)</p> <p>Source: ONS 2021 Mid-Year Population estimates</p> <p>A third of young people (aged 5 to 16) are physically inactive with</p> <ul style="list-style-type: none"> • around 1 in 3 children are currently driven to their primary school in the city <p>22 % of adults are inactive 59 % adults are overweight or obese. 16% of adults cycle once a week</p>	<p>linked to temporary changes can affect how efficiently care workers and others assisting vulnerable people can operate.</p> <p>A focus on improving commuter routes disproportionately impacts retired people and school age children whose preferred destinations are not linked to employment.</p> <p>Cycling infrastructure needs to be improved to encourage those who are not confident cyclists to travel by cycle and feel safe in doing so.</p> <p>LTP 5 consultation 2022 says: Youth Council:</p> <ul style="list-style-type: none"> - More signage on walking times to key destinations - Wider pedestrian crossings - More zebra crossings / traffic lights - Safer junctions / crossings near schools - Signs to indicate populated areas e.g. schools <p>LPT 5 - Older people focus group:</p>		<p>Roma, Traveller community etc, travelling to school.</p> <p>Monitor the impact of temporary measures on levels of vehicle traffic and take steps to reduce congestion.</p> <p>The scheme has both cycling, walking, and wheeling improvements with additional signalised crossings and segregated cycle paths. These create better links to and from Preston Park and the Rockery.</p> <p>Segregated cycle lanes and footway widening will help to reduce conflicts between cyclists and pedestrians.</p> <p>During the construction phase, ensure routes to school and other significant pedestrian routes have alternative provisions or a route to it.</p>
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		<p>“It’s brilliant here, have lots on our doorstep and need to be able to walk there safely”</p> <p>Schools LPT5 :</p> <ul style="list-style-type: none"> - Walking feels dangerous - Feel unsafe walking in the evening - Pedestrian safety - narrow pavements and cars come up from behind - Make it safer to walk in the dark - Those living near to school should be encouraged to walk, those further afield get the bus - Lots of people walk to school, it’s difficult to cross roads. More traffic lights are needed - Many parents are not allowing pupils to walk to school as they don’t feel it’s safe for children - Road safety e.g. crossing main roads, traffic levels - More zebra crossings especially near schools - Maps on-street to help people find their way around. 		
Disability¹⁵	51,000 (22%) of adults in the city have two or more long term health conditions	Blue badge parking is needed as close as possible if existing bays are removed	Partially-sighted and blind people will not necessarily be aware of changed road layouts. To mitigate this the	Where blue badge bays are impacted, we will ensure mitigation measures are considered

	<p>Nearly one in five residents (51,797 people, 19%) in Brighton & Hove are disabled as defined by the Equalities Act. This is higher than seen in both the South East (16%) and England (17%).</p> <p>Among disabled residents, for two out of five (20,351, 39%) their day-to-day activities are limited 'a lot' and for three in five (31,446 people, 61%) their activities are limited 'a little'.</p> <p>There are c.13,500 blue badge holders in the city</p> <p>There are c. 6,900 disabled concessionary bus pass holders in the city</p>	<p>for temporary / permanent transport measures.</p> <p>Loss of pay & display parking negatively affects disabled car users and carers who may also have used these spaces to park with their Blue Badge/Carers badge.</p> <p>Change of 24hr disabled parking to 3hr spaces limits access to employment for disabled workers who rely on extended hours and limits the length of time disabled car users can visit areas of the city.</p> <p>Specific detail on any temporary changes to disabled parking bays needs to be publicly available as soon as possible when implementing schemes.</p> <p>The needs of drivers of larger vehicles with large mobility aids should be considered when designing disabled parking bays.</p> <p>There is a need for better cycle parking for adapted bikes used by disabled people and cycle parking should be accessible for</p>	<p>project team work closely with Sightloss South East, Guide Dogs for the Blind, Thomas Pocklington Trust and other organisations to undertake site walks and meeting to inform the design and also make their members aware of the changes along this route via their communication channels.</p> <p>We have engaged with a range of groups via the Active and Inclusive Travel Forum. This includes BADGE (Brighton Access for Disabled Groups Everywhere) BAT (Beach Access Team) Bricycles Brighton Chamber of Commerce Cycling UK Community Works Sussex Safer Road Partnership Pedal People Buswatch UK Shoreham Port Authority Adur and Worthing Councils Sustrans Govia Thameslink Railway B&H Motorcycle Action Group Living Streets Brighton and Hove</p>	<p>to reduce impacts. An example being introducing new shared bays and double yellow lines close by or relocating blue badge bays where possible.</p> <p>There may be some inconvenience for all users when construction works take place, however discussions with the contractors will help to minimise disruption and scheduling of works to reduce any impact on residents.</p> <p>We will work with the bus companies to ensure that buses can operate with minimal disruption.</p> <p>Reduce, as far as possible, any physical barriers as part of transport changes that would create accessibility issues for wheelchair users and people with mobility and sensory impairments e.g. ensuring footway extensions are flush to the existing infrastructure and dropped kerbs are</p>
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		<p>disabled people (i.e. not needing to lift bikes, etc.).</p> <p>The width of cycle lanes should safely accommodate adapted cycles and passing space.</p> <p>People with sight loss are affected by difficulties navigating and seeing changes to signage, barriers and judging distances from other people</p> <p>Obstructions on the highway and footway (e.g. A-boards, tables & chairs and tree routes) put disabled road users at greater risk.</p> <p>Some disabled people rely heavily on carers to travel safely and easily around the city.</p> <p>Information shared publicly about the temporary changes must be accessible and inclusive, as well as the mechanisms for feeding back views.</p> <p>Floating bus stop arrangements and particularly those with a width below 2.5m are not</p>	<p>Enterprise Car Club B&H Local Access Forum Brighton & Hove Friends of the Earth/Transport Action Network Living Streets (national) Tenant Disability Group Amaze Carers Centre Zedify Sussex Ehlers-Danlos Hypermobility Syndromes (SEDS) BTN Bikeshare / Hourbike Brighton Bike Hub Guide Dogs Thomas Pocklington Trust (blind and visually impaired) Brighton Active Travel South East Community Rail Partnership Active Sussex 20 minute neighbourhoods Brighton & Hove Ramblers Group Trust for Developing Communities Scope Wellsbourne Health Care CIC</p> <p>Disabled car users may not be able to access areas of the city easily / may have to travel further distances if blue badge parking bays are suspended or moved as part of temporary changes.</p>	<p>provided where appropriate.</p> <p>Ensure temporary barriers, signs and businesses do not cause obstructions on the pavement through timely enforcement action.</p> <p>Maintain access in newly pedestrianised areas for disabled people travelling in cars / taxis.</p> <p>Maintain access to existing blue badge bays wherever possible or relocate nearby if suspended within reasonable walking distances. (N.B. Disabled badge holders can park on yellow lines for up to 3hrs if not causing obstruction).</p> <p>Ensure that temporary changes do not unwittingly restrict access to other accessible facilities.</p> <p>Incorporate accessible crossings into temporary measures wherever possible.</p>
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		<p>considered fully accessible for disabled people</p>	<p>Where parking allocation has changed on this scheme it has been mitigated and new shared spaces have been introduced in place of, or as close as possible to amenities and the previous bays.</p> <p>Changes to the transport network may exclude disabled people from areas they were previously able to access easily. Obstructions and inaccessible cycling infrastructure may discourage disabled people from travelling actively. As the design of the scheme has progressed, cycle lanes are being provided at the widest possible size to make cycling infrastructure as accessible as possible.</p> <p>Information about the transport changes should be clear, accessible and available in a range of formats.</p>	<p>Share information about the changes with local representative groups for wider dissemination. This includes sharing information through the Active & Inclusive Travel Forum.</p> <p>Increase accessibility and inclusivity of information on the changes and the mechanisms for feeding back views. Provide in Easy Read, Braille, and Large Print versions on request.</p> <p>Utilise the support and expertise of representative groups to ensure information is as accessible as possible and actions are targeted to ensure a broad spectrum of concerns are addressed.</p> <p>Maximise the width of new and existing cycle infrastructure where possible to ensure they are accessible to all types of adapted cycles with appropriate dropped kerbs for easy access.</p>
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				have priority and to mitigate the likelihood of conflicts between pedestrians and cyclists the hybrid arrangements have been designed to enhance the pedestrian priority. This includes materials used on the surface, tactile paving, zebra crossings, a raised cycle lane and a reduced cycle lane width to slow cyclists and a stop line to hold the cyclists for pedestrian priority. Hybrid bus stop arrangements have been designed in accordance with the DfT's Inclusive Mobility Guidance.
Gender reassignment ¹⁶	2,341 residents aged 16+ (1.0%) identify with a gender different from their sex registered at birth	No specific disproportionate impacts of the scheme identified for this group at this time.	No specific disproportionate impacts of the scheme identified for this group at this time.	No specific disproportionate impacts of the scheme identified for this group at this time.
Pregnancy and maternity ¹⁷	25% of households in the city have dependent children	Cycle lanes should be wide enough to accommodate cycles with child trailers/tagalongs. Dedicated cycle lanes make it safer and easier to cycle with children.	A significant number of people may need / choose to travel as part of a family unit. Obstructions, poor quality footways and crossings, and inaccessible walking infrastructure may discourage family units from travelling actively and present safety concerns.	Ensure changes are designed with family travel in mind, e.g. space and safety, ensure width for buggies or wheelchairs are considered Increase step-free access and avoid or reduce, as far as possible, any physical barriers as part of

				<p>crossing improvements that would create accessibility issues for wheelchair users and people with mobility impairments</p> <p>Ensure lighting, signs and other infrastructure do not cause obstructions on the pavement.</p>
<p>Race/ethnicity¹⁸ Including migrants, refugees and asylum seekers</p>	<p>54,343 residents (20%) were born outside of the UK</p> <p>72,272 residents (26%) are from a Black or Minority Ethnic group</p> <p>5.4% of households have no members with English as their main language.</p>	<p>We need to learn significantly more about the unique barriers to engagement and active travel that exist for Black and Racially Minoritised people, including intersectional lived experiences, and impact of other diverse identities.</p>	<p>Black and Minority Ethnic groups are more likely to be in roles where travel to work is unavoidable and where they are unable to change their working hours to travel at less busy times.</p> <p>People who do not speak / have who do not have English as their first language may struggle to access information about the transport changes that would help keep them safe.</p>	<p>Ensure interpreting services are available to support customers who do not have English as their first language.</p> <p>Share information about the transport changes with local groups for wider dissemination to different communities.</p> <p>Ensure Access Fund schemes that promote sustainable transport and support access to employment and education, are well publicised amongst Black and Racially Minoritised groups and communities.</p> <p>Provide information in relevant languages on request.</p>

				<p>Highlight the languages feature through Brighton & Hove City Council's website which allows pages to be viewed in multiple languages.</p> <p>Assess and better understand safety and lived experiences around travel, access, barriers to engagement with active travel options, and road/usage for Black and Racially Minoritised and Multiple heritage people across age, faith, disabled, LGBTQIA+ and other intersections.</p>
Religion or belief¹⁹	55% of residents have no religion or belief.	We need to learn significantly more about the unique barriers to engagement and active travel exist for people of faith with intersections with Black and Racially Minoritised identities, including intersectional lived experiences and impact of other diverse identities.	No specific disproportionate impacts of the scheme identified for this group at this time.	<i>No specific impacts of the scheme identified for this group. However, we do not clearly understand if there are any barriers to engagement, travel safety and usage experiences that differ for this group similar to the intersectional lived experiences of Black and Racially Minoritised groups. More engagement and consultation work to be identified and undertaken for this and Black and</i>

				<i>Racially Minoritised groups.</i>
Sex/Gender²⁰	<p>In 2021 there was estimated to be 141,000 female (51%) and 135,400 male (49%) and residents in the city.</p> <p>Source: ONS 2021 Mid-Year Population estimates</p> <p>In the city, 58% of carers are women rising to 62% of those providing care for 50 hours or more a week. Most caregivers, at home and in our communities, are also women.</p>	<p>Obstacles on cycling routes are more likely to impact women who may be travelling with children and larger, adapted bikes / cargo bikes.</p> <p>Women are more likely to cycle if they feel the route is safe (both physically and socially).</p> <p>Women are more likely to be travelling with children on 'the school run'.</p>	<p>Women are more likely to be travelling on the network with family members, as primary carers.</p> <p>Provision of protected cycling infrastructure, separated or away from motor traffic, is more likely to encourage women and families to cycle.</p>	<p>Consider the needs of key workers (e.g. care workers accessing clients' homes) when making changes to the transport network, (e.g. removing parking spaces).</p> <p>Ensure the design of cycling facilities is inclusive, (e.g. maximising the width of cycling infrastructure to ensure accessibility for all types of adapted cycles, installing dropped kerbs for easy access, and removing physical barriers/obstructions wherever possible).</p> <p>Ensure light separation on temporary cycle lanes to provide greater protection vehicle traffic for users.</p> <p>Identify and create opportunities to reallocate road space near schools to facilitate active travel and support physical distancing as</p>

				more children return to education.
Sexual orientation²¹	25,247 residents age 16+ (10.6%) identified as Gay or Lesbian, Bisexual or Other sexual orientation. The city is known for being a welcoming place for LGBTQ+ people and hosts large-scale annual events such as Pride		Following discussions with the BHCC Events Team, works will take place after Brighton Pride in Preston Park so it does not impact events.	Continue to liaise with the Events Team on Pride and other events to identify and remove barriers and any disproportionate impacts.
Marriage and civil partnership²²	Only a third of Brighton & Hove residents (33%, 77,241 people) aged 16 or older are married or in a civil partnership. Source: ONS 2021 UK Population Census	No specific disproportionate impacts of the scheme identified for this group at this time.	No specific disproportionate impacts of the scheme identified for this group at this time.	No specific disproportionate impacts of the scheme identified for this group at this time.
Community Cohesion²³	The council has a responsibility to promote good relations between people of different protected characteristic groups under the Equalities Act	No specific disproportionate impacts of the scheme identified for this group at this time.	No specific disproportionate impacts of the scheme identified for this group at this time.	Share information about changes and works being undertaken at the location(s) with local representative groups for wider dissemination.
Other relevant groups²⁴	No other relevant groups who may experience disproportionate impacts identified at this time.	No other relevant groups who may experience disproportionate impacts identified at this time.	No other relevant groups who may experience disproportionate impacts identified at this time.	No other relevant groups who may experience disproportionate impacts identified at this time.
Cumulative impact²⁵	Around 3 people are killed and 158 seriously injured on the city's roads each year. More than half of the people killed or seriously injured on	Safe walking, wheeling and cycling routes give people alternatives to increasingly unaffordable car ownership and the rising cost of public transport.		Work with representative groups in the city to understand the key transport and travel issues for all people.

	<p>the city's roads are pedestrians or pedal cyclists</p> <p>38.2% of households in the city don't own a car (or have one available). This increases to over 60% in more central areas of the city.</p>			
<p>Assessment of overall impacts and any further recommendations²⁶</p>				
<p>The city's transport network is used by everyone and therefore, any permanent or temporary changes to the network have the potential to impact on all groups of people with protected characteristics under the Equality Act.</p> <p>As the measures in the Action Plan are implemented the groups identified as most at risk of being disproportionately affected are disabled people, those from Black and Minority Ethnic groups and women. It is important that the changes:</p> <ul style="list-style-type: none"> • Where possible meet physical accessibility standards in the latest guidance so as not to negatively impact disabled people but also provide accessible and inclusive improvements to support active travel. Where guidance cannot be fully complied with, mitigation measures must be taken to minimise potential impacts. • As a priority, retain disabled parking wherever possible and maintain disabled access. Where it is not possible to retain parking, mitigation measures such as new parking facilities close by will be incorporated into design. • Facilitate full accessibility for disabled people and where full accessibility is not practicably achievable ensure that sufficient mitigation measures are made so that accessibility can still be achieved safely and without disproportionately affecting disabled people. • Minimise obstructions and clutter on the highway, particularly where a road layout has been altered, taking opportunities to remove unnecessary signs / clutter to provide a better experience and clear routes for all people. • All communications are clear, accessible, and available in multiple formats to a wide audience. Including an offer to provide translated information, easy to read, braille and large text upon request. <p>Continued engagement with organisations representing equality groups about the impacts of planned and implemented measures will be important for ensuring issues and concerns for specific communities are picked up and addressed.</p> <p>Engagement with Possibility People and Badge have highlighted the following concerns:</p> <ul style="list-style-type: none"> - Hybrid floating bus stop access - Engagement and Accessibility - Blue Badge Bays and access to Preston Park and local amenities - Conflicts with other user 				

These concerns will be reviewed and further details around the placement of bus stops / shelters, signing and lining investigated.

This scheme will provide improvements with additional signalised crossings, better segregation of cyclists and pedestrians, and bus stop improvements. Work is ongoing to ensure that the scheme and particularly the floating bus stops and hybrid bus stops are as accessible and inclusive as is practicably possible. The project team has sought continuous engagement and feedback from community groups and the Active and Inclusive Travel forum and have and will continue to improve accessibility wherever possible within the design.

During the construction phase, we will be working with the contractor to ensure access is maintained. This will be a requirement of the works and further details will be provided in the phasing of the scheme and made available via communications and / or on the BHCC website. On site supervision will ensure this is monitored and access is reasonably maintained.

4. List detailed data and/or community feedback that informed your EIA

Title (of data, research or engagement)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
Initial City-Wide Public Consultation	01/02/21 – 14/03/21	Data gathered from responses to publicly available consultation document – document not completed by all residents and as such not all views will be noted.	ETS committee approval was granted for the scheme to progress to construction in March 2022, this can be found via the following link: A23 Active Travel Scheme - Phase 1 . Whilst no further formal consultation is planned, officers will use targeted communications to provide regular updates to residents and business and keep the webpage for the project up to date with accessible information.
BHCC Transport Staff Briefing	05/02/21 And February 2023		
Stakeholder Workshops	09/02/21 & 25/02/21 and February 2023		
Transport Partnership Workshop	02/03/21 and February 2023		
Bus Service Provider Consultation	04/03/21 and March 2023		

Further Engagement – Detailed Design Public Workshops	01/12/21 – 04/12/21		Residents and businesses will be notified of works 3 weeks before the start. A communications plan is being developed with the EEC Communications Officer.
Further Engagement – Active & Inclusive Travel Forum	08/12/21 and February 2023 via information pack.	Not all stakeholders in Forum attended meeting.	<p>Circulate meeting notes to all members of Forum requesting any further comments.</p> <p>Further engagement took place in February 2023 which included an information pack for everyone. Where requested, online or site visits have been undertaken with stakeholders. Good engagement from a range of groups.</p> <p>Feedback assessed and sent to designers to be assessed and incorporated where feasible to do so.</p>
Further Engagement – Bus Service Providers (Bus Boarder Arrangement Design Enquiry)	14/01/22		
Local Transport Plan / Local Walking and Cycling Infrastructure Plan	2022	Consultation undertaken	LCWIP adopted
BHCC Corporate Plan 2020-2023	2020	None identified	
UK Population Census	2011	None identified	

Customer contact via BHCC Transport Projects inbox		Largely reflects views of people who are against changes / wish to complain	
Joint Strategic Needs Assessment (JSNA) Executive Summary June 2022	2022	None identified	
<p>Census 2021</p> <ul style="list-style-type: none"> • Sexual orientation and gender identity: Census 2021 in England and Wales • Demography and migration: Census 2021 in England and Wales • Ethnic group, national identity, language, and religion: Census 2021 in England and Wales <p>Household language</p>	2021	None identified	
Local Insight profile for 'Brighton and Hove' area	2023	OCSI work with public and community sector organisations to improve services. We turn complex datasets into engaging stories, making data, information and analysis accessible for communities and decision-makers. See www.ocsi.co.uk for more information.	
Brighton and Hove Local Authority 2021 Census Area Profile – Nomis Official Census and Labour Market Statistics	2021	Nomis is a service provided by Office for National Statistics (ONS), the UK's largest independent producer of official statistics. On this website, we publish statistics related to population, society and the labour market at national, regional and local levels. These include data from current and previous censuses.	

5. Prioritised Action Plan²⁷

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.				
Local residents may not have given their views on the project proposals – all groups possibly affected.	Further targeted consultation with residents that live/work within the vicinity of the proposed works.	Consultation responses from residents within the vicinity of the proposed works.	Responses to further consultation from local residents.	Completed December 2021
Further design work required on Bus Boarder arrangements following consultation feedback. Impact to disabled users and vulnerable road users.	Develop a hybrid bus boarder/floating bus stop design with input from Brighton and Hove Buses and guidance from DfT's Inclusive Mobility A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure.	Design option produced that account for a wider range of users in a more holistic way.	A design that provides accessibility for disabled people to access bus stops and use the bus service. The design will also undertake a Road Safety Assessment with any required actions to improve safety reasonably implemented.	By June 2023
All	Ensure detail of changes are published publicly with a distribution area/list reflecting the small-scale nature of the schemes	More people aware of what the council is doing and can plan their journeys accordingly	Fewer public enquiries about the changes	As and when information pack are mailed out and if/when TROs are advertised. Highlight the languages feature through Brighton & Hove City Council's website which allows pages to be viewed in multiple languages. Provide information in relevant languages, Easy

				Read, Braille, and Large Print versions on request.
All	Share information about changes with local community / representative groups to disseminate widely	Wider groups are aware of changes and can plan accordingly	Fewer negative impacts / complaints about the measures from specific groups	Pre implementation
Parents, Disabled People Age	Ensure measures that are in place for temporary works meet accessibility standards	Disabled users of the affected area and families are able to utilise the new measures safely and without obstruction	Fewer negative impacts / complaints about the measures from specific groups	Pre and during implementation
Black and Minority Ethnic groups – people whose first language is not English	Ensure information is shared about changes with local community / representative groups to disseminate widely	Greater awareness of the changes among minority groups	Fewer negative impacts / complaints about the measures from specific groups	Pre and during implementation
All	Ensure all works take into account people gathering near places of cafes/restaurants, community hubs and shops	People are still able to gather and that works don't obstruct this gathering	Reduced complaints about physical space from communities / residents wanting to gather	Pre and during implementation
All	Ensure detail of changes are published publicly with a distribution area/list reflecting the small-scale nature of the schemes	More people aware of what the council is doing and can plan their journeys accordingly	Fewer public enquiries about the changes	As and when information pack are mailed out and if/when TROs are advertised. Highlight the languages feature through Brighton & Hove City Council's website which allows pages to be viewed in multiple languages. Provide information in relevant languages, Easy

				Read, Braille, and Large Print versions on request.
Disabled people and groups	Review and address specific issues raised by Badge and Possibility People. Offer site meeting to discuss the project and any concerns. Review consultation materials and identify any lessons learnt for future engagement.	Improvements in the design of the scheme / hybrid bus stops	Fewer negative impacts / complaints about the measures from specific groups	By June 2023 for design items

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

Staff member completing Equality Impact Assessment: Jazmine Hayes, Senior Project Manager

Date: 06th April 2023, re-submitted with additional considerations on 24th May 2023

Directorate Management Team rep or Head of Service/Commissioning: David Parker, Head of Transport Projects & Engineering

Date: 06th April 2023, re-submitted with additional considerations on 24th May 2023

CCG or BHCC Equality lead: Chris Brown, Equality, Diversity, and Inclusion Officer on 6th June 2023, and Sabah Holmes, Equality, Diversity, and Inclusion Manager Date: 14th June 2023

Guidance end-notes

¹ 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.

² Our duties in the Equality Act 2010

As a public sector organisation, 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 in relation to their '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).
- **advance equality of opportunity.** This means the need to:
 - Remove or minimise disadvantages suffered by people due to their protected characteristics
 - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
 - Encouraging people from protected groups to participate in public life or in other activities where their 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

³ 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 within the context

The greater the impacts, the more thorough and demanding the process required by the Act will be.

⁴ **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 a specific group or groups (eg: older people)?
- 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.

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

⁶ **ID no:** The unique reference for this EIA. If in doubt contact your CCG or BHCC equality lead (see page 1)

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

⁸ **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)'

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.

⁹ **Previous actions:** If there is no previous EIA or this assessment if of a new service, then simply write 'not applicable'.

¹⁰ **Data:** Make sure you have enough data to inform your EIA.

- What data relevant to the impact on specific groups of the policy/decision/service is available?¹⁰
- What further evidence is needed and how can you get it? (Eg: further research or engagement with the affected groups).
- What do you already know about needs, access and outcomes? Focus on each of the groups identified above in turn. Eg: who uses the service? Who doesn't and why? Are there differences in outcomes? Why?
- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
- Do any equality objectives already exist? What is current performance like against them?
- Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?
- Use local sources of data (eg: JSNA: <http://www.bhconnected.org.uk/content/needs-assessments> and Community Insight: <http://brighton-hove.communityinsight.org/#>) and national ones where they are relevant.

¹¹ **Engagement:** You must engage appropriately with those likely to be affected to fulfil the equality duty.

- What do people tell you about the services?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
 - (a) consult when proposals are still at a formative stage;
 - (b) explain what is proposed and why, to allow intelligent consideration and response;
 - (c) allow enough time for consultation;
 - (d) make sure what people tell you is properly considered in the final decision.
- Try to consult in ways that ensure all perspectives can be considered.

-
- Identify any gaps in who has been consulted and identify ways to address this.

¹² Your EIA must get to grips fully and properly with actual and potential impacts.

- The equality duty does not stop decisions or changes, but means we must conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific so decision-makers have a concrete sense of potential effects. Instead of "the policy is likely to disadvantage older women", say how many or what percentage are likely to be affected, how, and to what extent.
- Questions to ask when assessing impacts depend on the context. Examples:
 - Are one or more groups affected differently and/or disadvantaged? How, and to what extent?
 - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
 - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
 - If there is negative differential impact, how can you minimise that while taking into account your overall aims
 - Do the effects amount to unlawful discrimination? If so the plan must be modified.
 - Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

¹³ Consider all three aims of the Act: removing barriers, and also identifying positive actions we can take.

- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
- Be specific and detailed and explain how far these actions are expected to improve the negative impacts.
- If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.
- An EIA which has attempted to airbrush the facts is an EIA that is vulnerable to challenge.

¹⁴ **Age:** People of all ages

¹⁵ **Disability:** A person is disabled if they have a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. The definition includes: sensory impairments, impairments with fluctuating or recurring effects, progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses, produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis.

¹⁶ **Gender Reassignment:** A transgender person is someone who proposes to, starts or has completed a process to change their gender. A person does not need to be under medical supervision to be protected

¹⁷ **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

¹⁸ **Race/Ethnicity:** This includes ethnic or national origins, colour or nationality, and includes refugees and migrants, and Gypsies and Travellers. Refugees and migrants means people whose intention is to stay in the UK for at least twelve months (excluding visitors, short term students or tourists). This definition includes asylum seekers; voluntary and involuntary migrants; people who are undocumented; and the children of migrants, even if they were born in the UK.

¹⁹ **Religion and Belief:** Religion includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief.

²⁰ **Sex/Gender:** Both men and women are covered under the Act.

²¹ **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

²² **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.

²³ **Community Cohesion:** What must happen in all communities to enable different groups of people to get on well together.

²⁴ **Other relevant groups:** eg: Carers, people experiencing domestic and/or sexual violence, substance misusers, homeless people, looked after children, ex-armed forces personnel, people on the Autistic spectrum etc

²⁵ **Cumulative Impact:** This is an impact that appears when you consider services or activities together. A change or activity in one area may create an impact somewhere else

²⁶ **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?

²⁷ **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.