

## 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-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: Age<sup>13</sup>) 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 needed<sup>4</sup>.

<b>Title of EIA<sup>5</sup></b>	Citywide School Streets Programme	<b>ID No.<sup>6</sup></b>	EEC54
<b>Team/Department<sup>7</sup></b>	Transport Projects		
<b>Focus of EIA<sup>8</sup></b>	<p>School Streets support the safe movement of children to and from school by creating streets that allow for more walking, cycling and scooting. Motor vehicle access to streets near school entrances is restricted during school drop off and pick up times which reduces vehicle congestion around the school gates and improves road safety. This in turn encourages and enables active, accessible, and sustainable travel by children and their parents/carers on the school journey.</p> <p>The delivery of a School Streets programme is proposed within the national and local policy context. Nationally, the Government released their 'Gear Change' vision document in July 2020 which sets out the national ambition to make walking and cycling the natural choice for short journeys, or as part of a longer journey. Locally, the new Local Transport Plan 5 (LTP5) is being developed to help everyone</p>		

move around the city more safely, sustainably, and easily. School Streets will support the vision, outcomes and principles of the new LTP5, as agreed by the ETS Committee on 22 June 2021. One of the key principles is shifting how people travel – prioritising walking and cycling for shorter journeys and public transport for longer journeys.

Initially 55 infant, junior and primary schools have been assessed for their eligibility for a School Streets closure. Implementation of infrastructure as part of School Streets will be complemented by support to schools by the Council through School Travel Planning, Personalised Travel Planning for parents/carers, cycle training for children and additional resources for schools to encourage participation in active travel initiatives such as Walk to School Week. Schools that are not eligible for a School Streets closure due to highway feasibility assessments will also receive support through provision of active travel resources and child cycle training delivered by Bike It Officers and Bikeability cycle trainers in schools.

There are currently 10 operational School Streets sites across the city, with two currently under construction and 3 more planned for development in 2023/2024. Due to covid restrictions impacting on the first main batch of sites, post implementation data is limited however dependable quantitative data will be available in the later part of 2023. Qualitative data has and, continues to be collected periodically with a strong theme of overwhelming support for the School Streets programme.

This overarching EIA considers any broad, disproportionate impacts of these changes to highlight any unique factors that might have disproportionate effects on people with protected characteristics.

## 2. Update on previous EIA and outcomes of previous actions<sup>9</sup>

<b>What actions did you plan last time?</b> (List them from the previous EIA)	<b>What improved as a result?</b> What outcomes have these actions achieved?	<b>What <u>further</u> actions do you need to take?</b> (add these to the Action plan below)
NA	NA	NA

### 3. Review of information, equality analysis and potential actions

Groups to assess	What do you know <sup>10</sup> ? Summary of data about your service-users and/or staff	What do people tell you <sup>11</sup> ? Summary of service-user and/or staff feedback	What does this mean <sup>12</sup> ? Impacts identified from data and feedback (actual and potential)	What can you do <sup>13</sup> ? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and foster good relations
Age <sup>14</sup>	<p>Residents of Brighton &amp; 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"> <li>- Fewer children aged 0 to 15 years (15%) – South East (19%), England (19%)</li> <li>- More working age adults aged 16 to 66 (72%) – South East (64%), England (65%)</li> </ul>	<p>Children of all ages are vulnerable network users, particularly during school run times.</p> <p>It is important for pupils and families to have access to a safe, comfortable and desirable environment for walking, wheeling and bicycle riding to schools and nurseries.</p> <p>Due to operational conflicts, it is possible that not all schools will be able to benefit from a school streets scheme.</p> <p>Changes to the transport network could impact access for carers that operate in the residential community within the closure.</p> <p>Adults of all ages, including those 65+, could be volunteers for volunteer-</p>	<p>Most children aged 5-10 will be directly or indirectly affected, and many children aged 0-4 and 11-15 may also be affected due to families with children of various ages travelling on school runs together and/or the adjacency of impacted schools to each other.</p> <p>Nationwide, children aged below 16 years are by far the most at risk of death or serious injury from motor vehicle crashes in the AM and PM during the school-run time periods (8-9am and 3-4pm) for each. The PM school-run and subsequent hours are particularly dangerous times for school aged children.</p> <p>There is evidence that the school run contributes to detrimental health impacts in school-aged children</p>	<p>All effort must be taken to provide school streets schemes at all schools to ensure that the positive impacts are experienced equally across the city</p> <p>In cases where schools cannot be considered for a school streets scheme due to operational conflicts within the transport network, supplementary measures should be considered to alleviate detrimental impacts of motor vehicle activity at and near the school</p> <p>Pursue opportunities to improve the safety and comfort of all people who may wish to walk, roll, or otherwise use the footway space as permitted.</p> <p>Pursue opportunities to ensure that cycle facilities improve the safety and</p>

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	<p>- Fewer older people aged over 66 (13%) – South East (17%), England (16%)</p> <p>A third of young people (aged 5 to 16) are physically inactive with around 1 in 3 children are currently driven to their primary school in the city</p> <p>22 % of adults are inactive 59 % adults are overweight or obese. 16% of adults cycle once a week</p>	operated closures.	<p>from automobile emissions, including for both children inside and outside of motor vehicles.</p> <p>School streets closures improve detrimental health and safety impacts of motor vehicle use on school-aged children during the school run time periods.</p> <p>Results from impacts monitoring in peer communities shows that school streets schemes result in reductions in automobile use near schools and for the purposes of school trips, and increases in use of active and sustainable modes for school trips</p> <p>The potential of school streets closures may not be fully realised without additional measures put in place to ensure that non-driving school trips are taken within a safe and</p>	<p>comfort of people of all ages and abilities who may wish to ride a cycle, including but not limited to bicycles and adaptive bicycles.</p> <p>Monitor and maintain implemented schemes to understand impact and determine if and when changes should be made, or additional measures considered</p> <p>Ensure that the infrastructure installed at volunteer-operated schemes does not pose a health and safety risk for older adults</p> <p>Ensure that a mechanism exists to ensure that carers of people living on closed streets maintain access at all times. Carers are exempt from all restrictions, and this is maintained at volunteer / school staff operated sites by gates</p>

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			<p>comfortable network.</p> <p>It is possible that pupils that are at risk from detrimental impacts or automobile-oriented environments will be excluded because their school will not receive a School Streets scheme due to operational conflicts.</p> <p>Traffic impacts and/or modification of parking linked to street closures or related infrastructure changes could affect the efficiency of care workers and others assisting older adults.</p> <p>Improperly designed or operated infrastructure at volunteer-led closures could pose a health and safety risk for older adults.</p> <p>Access impediments and/or removal of parking spaces linked to street closures or related infrastructure changes can affect how</p>	<p>being opened to grant access to carers. At sites that are signage only, carers are free to enter without a physical barrier.</p>

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			efficiently care workers and others assisting vulnerable people can operate.	
<b>Disability<sup>15</sup></b>	<p>51,000 (22%) of adults in the city have two or more long term health conditions</p> <p>19,000 (8%) of adults in the city have mental and physical disabilities</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>More than one in 20 residents say their day-to-day activities are 'limited a lot' due to a long-term health problem or being disabled.</p>	<p>Loss of access and parking can negatively impact Blue Badge holders, as well as SEND children and families that are not Blue Badge holders</p> <p>Footways and crossings must be of adequate width and design to facilitate safe access</p> <p>Bumps at crossings, controlled crossings and central waiting spaces are helpful for sight impaired people crossing roads.</p> <p>Flat surfaces and dropped kerbs are important for people using mobility aids.</p> <p>Audible signals at pedestrian crossings are important for those with hearing impairments.</p> <p>People with sight loss are</p>	<p>School street closures could diminish access for people with disabilities and special needs of all types.</p> <p>People with disabilities of any type that affects their ability to safely navigate the environment could be put at undue risk if interventions are not designed and operated in a manner that accommodates their needs</p> <p>People with disabilities of any type that affects their ability to access or understand information could be put at risk by changes in the environment that have not been properly communicated to them.</p> <p>Obstructions on the highway and footway and the condition of the pavements/roads put</p>	<p>Blue badge holders should be exempted from enforcement of school street closures.</p> <p>Ensure that a mechanism exists to ensure that carers of people living on closed streets maintain access at all times. Carers are exempt from all restrictions, and this is maintained at volunteer / school staff operated sites by gates being opened to grant access to carers. At sites that are signage only, carers are free to enter without a physical barrier. When included as part of schemes, any footways, crossings and cycling infrastructure, including cycle parking, should be designed and provided to accommodate safe access and use for disabled people</p>

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		<p>affected by difficulties navigating and seeing changes to signage, barriers and judging distances.</p> <p>People with learning disabilities can find it more difficult to understand the network, or changes to the network.</p> <p>Some disabled people rely heavily on carers visiting them at home and needing to park nearby.</p>	<p>disabled road users at greater risk.</p> <p>Access impediments and/or removal of parking spaces linked to street closures or related infrastructure changes can affect how efficiently care workers and others assisting disabled people living near schools can operate.</p>	<p>Wherever parking bays must be relocated or discontinued, disabled parking bays should only be discontinued as a measure of last resort.</p> <p>If disabled parking bays must be relocated, these need to be as close as possible to previous bay locations.</p> <p>Information shared publicly must be shared in a timely fashion and be accessible and inclusive, as must the mechanisms for consultations.</p> <p>Ensure that a mechanism exists to ensure that carers of people living on closed streets always maintain access</p> <p>Engage with local disability groups to update them on changes to network.</p>
<b>Gender reassignment<sup>16</sup></b>	7.21% of people aged 16 years and over in Brighton and	No specific impacts identified for this group	No specific impacts identified for this group.	There may be a potential safety impact for trans/non-binary children walking



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	<p>Hove identify as a different gender than that registered at birth.</p> <p>Statistics are not available for those under 16%.</p>			<p>instead of being dropped at the school gates and being more likely to experience bullying on the way to school. However, the council would never encourage primary school aged children to walk to school without a parent or carer and this will be communicated to all School Streets communities when sites are launched.</p>
<b>Pregnancy and maternity<sup>17</sup></b>	<p>25% of households in the city have dependent children.</p>	<p>People who are pregnant or have recently been pregnant may have greater difficulty managing the school run, particularly if there are multiple children across different age groups in the household.</p> <p>People who are pregnant or have recently been pregnant could be volunteers for volunteer-operated closures</p>	<p>People who are pregnant or have recently been pregnant may be less able or willing to shift from driving to active or sustainable modes when travelling with multiple children and/or children across multiple age groups.</p> <p>Improperly designed or operated infrastructure at volunteer-led closures could pose a health and safety risk for people who are pregnant or have recently been pregnant</p>	<p>Ensure that schools have an up-to-date travel plan.</p> <p>Where possible, ensure that schools arrange a park-and-stride location or there is close by on street parking that acts as a park-and-stride. All park-and-strides should be accessible for those with pushchairs and wheelchairs.</p> <p>Ensure that the infrastructure installed at volunteer-operated schemes does not pose a</p>

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				health and safety risk for people who are pregnant or have recently been pregnant
<b>Race/ethnicity<sup>18</sup></b> Including migrants, refugees and asylum seekers	19.5% of the city's population are from Black and Racially Minoritised groups, 80.5% are White British.  8.3% of the population do not speak English as their preferred or first language.		People who do not speak English or have poor English skills may struggle to access information about the changes that would help keep them safe.  People from Black and Racially Minoritised groups are often under-represented in engagements and consultations	Ensure interpreting services are available to support customers whose first language is not English.  Share information about the transport changes with local groups for wider dissemination to different communities.  There may be a potential safety impact for children in this group walking instead of being dropped at the school gates and being more likely to experience bullying on the way to school. However, the council would never encourage primary school aged children to walk to school without a parent or carer and this will be communicated to all School Streets communities when

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				sites are launched.
<b>Religion or belief<sup>19</sup></b>	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.
<b>Sex/Gender<sup>20</sup></b>	<p>The gender split of Brighton &amp; Hove's population is even (50/50).</p> <p>0.35% of people aged 16 years and over identified as non-binary in Brighton and Hove.</p> <p>Among young children and school-aged children (aged 0-15) there are slightly more males (51%) than females (49%).</p> <p>Age 0-4: 12,987  <ul style="list-style-type: none"> <li>• Male: 6,715 (52%)</li> <li>• Female: 6,272 (48%)</li> </ul> Age 5-10: 17,384  <ul style="list-style-type: none"> <li>• Male: 8,873 (51%)</li> <li>• Female: 8,511 (49%)</li> </ul> Age 11-15: 14,379  <ul style="list-style-type: none"> <li>• Male: 7,386 (51%)</li> <li>• Female: 6,993 (49%)</li> </ul> </p>	<p>School aged girls are less likely than school aged boys to travel to school using active or sustainable modes</p> <p>Women are more likely to be travelling with, and accompanying children on, the school run.</p> <p>Women are more likely to be the lone parent in single parent households.</p> <p>Women and girls are more likely to walk or ride a bicycle if they feel the route is safe (both physically and socially).</p> <p>Obstacles on cycling routes are more likely to impact women who may be</p>	<p>Women who are travelling with children are more likely to be impacted by closures and related interventions.</p> <p>Women and girls are more likely to walk, roll, or otherwise use the footway space as permitted if they feel the route is safe (both physically and socially)</p> <p>Protected cycling infrastructure, separated or away from motor vehicles, is more likely to encourage women, girls and families to ride a bicycle.</p> <p>Men and boys who are more confident and/or comfortable are nonetheless put at higher</p>	<p>Pursue opportunities to improve the safety and comfort of all people who may wish to walk, roll, or otherwise use the footway space as permitted. This would include providing drop kerbs where possible and improving surface materials for wheeling.</p> <p>Pursue opportunities to ensure that bicycle facilities improve the safety and comfort of people of all ages and abilities who may wish to ride a bicycle.</p> <p>Ensure that a mechanism exists to ensure that carers of people living on closed streets maintain access at all times.</p>

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		<p>travelling with children and larger, adapted cycles / cargo cycles.</p> <p>The majority of home and professional caregivers are women.</p> <p>Nationwide, nearly twice as many school-aged boys were injured or killed in road traffic collisions as school aged girls.</p> <p>People of all sex/genders could be volunteers for volunteer-operated closures.</p>	<p>risk of death or serious injury when the network on which they are travelling does not maximise safety for users of all modes in design.</p> <p>Access impediments and/or removal of parking spaces linked to street closures or related infrastructure changes can affect how efficiently care workers and others assisting vulnerable people can operate.</p> <p>Improperly designed or operated infrastructure at volunteer-led closures could pose a health and safety risk for women</p>	<p>Ensure that the infrastructure installed at volunteer-operated schemes does not pose a health and safety risk for people of any gender.</p> <p>Ensure that schools have an up-to-date travel plan.</p>
<b>Sexual orientation<sup>21</sup></b>	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.
<b>Marriage and civil partnership<sup>22</sup></b>	There are 8,635 lone parent families in the city	Lone parents often have greater difficulty managing the school run, particularly if there are multiple children across different age groups in the household.	Lone parents may be less able or willing to shift from driving to active or sustainable modes when travelling with multiple children and/or children across multiple age groups.	<p>Ensure that schools have an up-to-date travel plan that consider the needs and options for single-parent households.</p> <p>Where possible, ensure</p>

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				that schools arrange a park-and-stride location.
<b>Community Cohesion<sup>23</sup></b>	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.
<b>Other relevant groups<sup>24</sup></b>	49,833 (17.2%) of Brighton & Hove residents live in one of the most deprived 20% of areas in England	There is a link between deprivation and access and safety of the transport network	Nationwide, school-aged children from the most deprived quintile of the population are nearly 4-5 times more likely to be killed or seriously injured in a traffic collision than school-aged children from the least deprived quintile of the population	Seek opportunities to incorporate community supportive infrastructure improvements in schemes that are supporting populations or areas of higher deprivation  Consider the levels of deprivation of school student populations, as well as neighbourhood areas of schools, when scoring schools for prioritisation
<b>Cumulative impact<sup>25</sup></b>	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.	No specific impacts identified for this group.
Assessment of overall impacts and any further recommendations <sup>26</sup>				

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Brighton & Hove City Council (BHCC) declared a climate and biodiversity emergency in December 2018 and committed to becoming a carbon neutral city by 2030. BHCC has created a programme of works that will help residents, visitors and businesses play their part and get the benefits of reaching the 2030 target. These include an improved and healthier environment for everyone and reducing the impacts of the climate and biodiversity emergency. Over a third of Brighton & Hove’s carbon emissions come from transport and the BHCC Climate Assembly acknowledged that the city needs to see a shift to public transport and active forms of travel to bring down the carbon and nitrous oxide emissions, which affect everyone in the city. 10 recommendations were made by the BHCC Climate Assembly to be considered by the council in developing its Local Transport Plan and Local Cycling and Walking Infrastructure Plan. This includes numerous points that School Streets are able to satisfy, notably the creation of healthier low traffic/pedestrianised communities.

School Streets schemes are a global success, with over 1000 school streets around the world and half of these in the UK. School Streets schemes reduce congestion and vehicles travelling through the School Street, reduce pollution around the school entrance, encourage more walking, cycling, wheeling and active journeys from pupils and parents/carers, result in less inconsiderate parking and dangerous manoeuvres, create a calmer, safer and cleaner environment, encourage independent mobility and create space for community connection and sociability.

In Brighton and Hove restrictions are timed for 2 respective 1 hour sessions; morning drop off and afternoon pick up. School Streets schemes have clear benefits for all residents in the city, there are however some potential negative impacts for certain people and/or groups as a result of timed closures. The following table lists these potential negative impacts and advises recommendations on how to overcome them:

Potential negative impact	Recommendations for mitigation
Parents/carers may experience greater difficulty managing the school run, particularly if there are multiple children across different age groups in the household.	Road closure restrictions are to operate within reasonably close proximity to the school so that those people who have to drive to school due their personal circumstances can park within a short walking distance to the school. Where possible, introduce park-and-stride and walking bus schemes to support parents at drop off and pick up.
Improperly designed or operated infrastructure at manned closures could pose a health and safety risk for all groups	Training to be provided to all individuals who operate closures and a guidance document is provided upon appointment which refresher training sessions offered periodically. Road Safety

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			Audits are undertaken at stage 1, 2 and 3 on all schemes and required changes to schemes will be implemented in line with safety requirements.	
Removal of parking spaces linked to street closures or related infrastructure changes can affect how efficiently care workers and others assisting vulnerable people can operate.			Care workers will be granted access to closures at all times, if visiting a resident/business that is within the closure. Pay and Display parking will be maintained wherever practicably possible.	
People with disabilities who are not blue badge holders may be impacted by access restrictions as they will not be able to enter closed roads in a motor vehicle during restricted hours.			People with disabilities who are not blue badge holders who need to enter the closure for permitted reasons will always be granted access i.e. residents, attend the school, work within the closure.	
People who do not speak English or have poor English skills may struggle to access information about the changes that would help keep them safe.			Translated information will be available on request and the BHCC will work with schools to identify any individuals that would benefit from translated information and provide this to communities.	
Restricted access for all groups during the construction phase.			During the construction phase, BHCC 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.	
Potential for trans/non binary and children from a different race/ethnic/religious backgrounds to be at risk of bullying if walking to school alone.			The council would never encourage primary school age children to walk to school without a parent or carer and this is communicated with all in School Streets communities. Furthermore, the School Streets team will liaise Community Safety Team and FCL to learn more and mitigate these potential impacts.	

School Streets is a rolling programme and is always adapting and evolving based on lessons learnt and knowledge acquired as more schemes are developed. Officers are committed to revisiting the EIA on a yearly basis in line with the programme, to assess impacts against the changeable nature of the programme i.e. different sites require many different measures.





#### 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)
BHCC Corporate Plan 2020-2023	2020		
Brighton & Hove Joint Health and Wellbeing Strategy 2019-2030	2019		
Developing a new transport plan for Brighton & Hove, BHCC	September 2021		
Mid-Year Population Estimates, UK, June 2020 <a href="#">Office for National Statistics</a>	2021		
School Streets East Sussex Trial Project 2021 <a href="#">East Sussex County Council</a>	2021		
Reported Road Casualties Great Britain Annual Report - DfT	2018, 2019, 2020		
Road injury prevention: Resources to support schools to promote safe active travel - <a href="#">Public Health England</a>	2016		

School Street Closures and Traffic Displacement Project: A Literature Review with Semi-Structured Interviews – Dr. Adrian Davis, Edinburgh Napier University	August 2020		
School Streets: Intervention Sites vs. Control Sites Full Report – <a href="#">Transport for London</a>	January 2021		
School Streets: Reducing children’s exposure to toxic air pollution and road danger – <a href="#">Possible, Mums for Lungs</a>	January 2021		
Equalities Impact Assessment – Local Transport Plan 5 initial document	August 2021		
Equalities Impact Assessment - Active Travel Fund Programme (Tranche 2)	July 2021		
Public consultations on the development of design options for school streets schemes	2021/2022 and 2022/2023 scheme consultation complete. As this is a rolling programme, consultation will be on-going each year at specific locations.		

Active and Inclusive Travel Forum	Ongoing		
Census 2021 data	March 2023		

## 5. Prioritised Action Plan<sup>27</sup>

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.				
All	Ensure clear, accessible, timely and inclusive information about the changes to the transport network and is published publicly, as well as the process being followed	More people aware of what the council is doing and why, and can plan their journeys accordingly	Fewer public enquiries about the changes	As and when changes to the transport network are made and/or altered
All (particularly disabled people, Black and Racially Minoritised groups and carers)	Share information about transport network changes with schools, residents, and local community/representative groups in appropriate formats to disseminate widely	Wider groups are aware and understand the changes and can plan their journeys accordingly	Fewer public enquiries about the changes from specific groups of users	As and when changes to the transport network are made and/or altered
All (particularly underrepresented groups)	Engage further with schools, residents, charities and local community/representative groups to understand the key transport and travel issues for specific communities/user groups	Feedback from specific communities / user groups will shape future changes	Fewer negative impacts/complaints about the measures from specific user groups	Throughout the planning, implementation, and ongoing monitoring phases of the program
All	Provide alternative mechanisms for people to feed back their views.	People with limited or no access to the internet can constructively share their views on the changes	Wider range of views inform the design of future transport changes	Throughout the planning, implementation, and ongoing monitoring phases of the program
All	Ensure measures that reallocate road space for walking and bicycle riding	Transport network users of all ages, abilities, and comfort levels are able to	No complaints about the ability to utilise active travel from the changes	Throughout the planning, implementation, and ongoing monitoring

	meet design and accessibility standards for people of all ages, abilities, and comfort levels	utilise the new measures safely and without obstruction	or incidents /injury caused.  Road safety audits not highlighting any issues with the design of schemes for disabled people.	phases of the program
All (but particularly parents and pregnant people, women and girls, school-aged children, disabled people)	Ensure measures that reallocate road space for walking and bicycle riding are designed to maximise use by people of all comfort levels	Transport network users of all ages, abilities, and genders feel safe and comfortable utilising the new measures	Decrease in number of users citing safety and comfort as a barrier to active travel for school trips	Throughout the planning, implementation, and ongoing monitoring phases of the program
All (but particularly lone parents and/or pregnant people or people who were recently pregnant)	Ensure that schools have an up-to-date travel plan that considers needs of different user groups and clearly defines options for families of all situations.  Where possible, ensure that schools arrange a park-and-stride location.	Affected groups are aware and understand the changes and their options and can plan their journeys accordingly  People who are unable or unwilling to forgo a private motor vehicle are provided with a clear, safe location to park for pick-ups and drop offs.	Fewer public enquiries about the changes.  Fewer negative impacts/ complaints about the measures.  Decrease in the number of pick ups and drop offs on nearby neighbourhood streets.	As changes to the transport network are planned and implemented
Disabled people	Ensure measures that reallocate road space for walking and bicycle riding meet design and accessibility standards for people of all abilities, and are an appropriate width to accommodate adapted cycles and child trailers.	Transport network users of all ages, abilities, and comfort levels are able to utilise the new measures safely and without obstruction.	No complaints about the accessibility of the changes from disabled people or incidents/ injury caused.  Road safety audits not highlighting any issues with the design of schemes for disabled people.	Throughout the planning, implementation, and ongoing monitoring phases of the programme.

Disabled people	Ensure that the placement and operation of signs and barriers do not cause obstructions for disabled users	Disabled people are unimpeded when using reallocated space	No complaints about the accessibility of the changes from disabled people or incidents/injury caused	As changes to the transport network are planned and implemented
Disabled people	Ensure essential access for disabled people is maintained in all areas	Disabled people are not prevented from accessing school street closures	No complaints about the accessibility of the changes from disabled people	As changes to the transport network are planned and implemented
Disabled people	Wherever possible, ensure disabled parking bays are not removed, but if this is necessary, relocate bays to the nearest possible site	Disabled car users are not disadvantaged or prevented from accessing school street closures	No complaints about the accessibility of the changes from disabled people	As changes to the transport network are planned and implemented
People with low or no income	Seek opportunities to incorporate community supportive infrastructure improvements in schemes that are supporting populations or areas of higher deprivation	Transport network users of all ages, abilities, and comfort levels from higher-deprivation populations or areas are able to utilise the new measures safely and without obstruction	No complaints about the changes from or regarding people with lower incomes  Road safety audits not highlighting any issues with the design of schemes  Decrease number of users citing safety and comfort as barriers to active travel	Throughout the planning, implementation, and ongoing monitoring phases of the program
People with low or no income	Consider the levels of deprivation of school student populations, as well as neighbourhood areas of schools, when scoring schools for prioritisation	Schools with students from higher-deprivation populations and/or are located in higher-deprivation areas are given additional points towards prioritisation	Number of schools with students from higher-deprivation populations and/or are located in higher-deprivation areas being prioritised for a scheme each year	Throughout the planning and monitoring phases of the program

**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)

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

**Date:** 18<sup>th</sup> April 2023

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

**Date:** 18<sup>th</sup> April 2023

**CCG or BHCC Equality lead:** Chris Brown, EDI Officer; signed off 02/08/2023; Sabah Holmes, EDI Manager - Approved Date: 07<sup>th</sup>

August 2023

## Guidance end-notes

<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 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



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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 within the context

The greater the impacts, 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 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.

<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 your CCG or BHCC equality lead (see page 1)

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

<sup>10</sup> **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?<sup>10</sup>
- 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.

<sup>11</sup> **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.

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- 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.

<sup>12</sup> 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?

<sup>13</sup> 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.

<sup>14</sup> **Age:** People of all ages

<sup>15</sup> **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.

<sup>16</sup> **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

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

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<sup>18</sup> **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.

<sup>19</sup> **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.

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

<sup>21</sup> **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

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

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

<sup>24</sup> **Other relevant groups:** e.g.: 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

<sup>25</sup> **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

<sup>26</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>27</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.