

Enfield Equality Impact Assessment (EqIA)

Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

SECTION 1 – Equality Analysis Details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	Providing Fixed Bus Stops for New Route 456 (as discussed under Portfolio Report PL 20.125 “Farm Road Yellow Lines and Bus Route 456”)
Lead officer(s) name(s) and contact details	Jonathan Goodson 0208 132 0988
Team/ Department	Traffic & Transportation
Executive Director	Sarah Cary
Cabinet Member	Cllr Guney Dogan
Date of EqIA completion	February 2021

SECTION 2 – Summary of Proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

Please summarise briefly:

What is the proposed decision or change?

What are the reasons for the decision or change?

What outcomes are you hoping to achieve from this change?

Who will be impacted by the project or change - staff, service users, or the wider community?

In 2019 Transport for London (TfL) undertook a consultation on a proposed new bus service: route 456. The proposed route is to extend the existing W10 service that links Crews Hill to Enfield Town; with buses continuing from the town to North Middlesex Hospital via Highlands, Winchmore Hill and Firs Lane. In April 2020 TfL published its report summarising the consultation and confirming its decision to proceed. While most feedback had been positive, objections had been received from residents of Farm Road. Subsequent adverse comment has arisen from other roads in the Winchmore Hill area, with residents notably being opposed to the introduction of fixed bus stops.

While the decision on the introduction and alignment of the route fell to TfL and has already been made. Enfield Council is a decision-making partner in the principle of introducing fixed stops, where suitable positions can be found.

This assessment accompanies the scheme report to capture two key discussion points around providing fixed bus stops:

- (1) **Physical Accessibility** - the benefits fixed stops provide in terms of better accessibility for those service users falling into certain protected characteristic groups, such as the disabled.
- (2) **Personal Security** - the benefits to more vulnerable service users in placing stops where they benefit from good natural surveillance.

(1) Physical Accessibility

TfL's report lists benefits of providing fixed stops, which include the following:

- Easier boarding and alighting for some passengers with mobility issues
- Greater certainty on when and where the bus will stop

While it may appear to work well in certain locations and on certain occasions, the Council's view is that the alternative 'hail and ride' system can leave less able users uncertain as to the conditions they will encounter when boarding and alighting. Parked vehicles, for example, might prevent the bus driver finding a position where the bus can access the kerb, and the step between the bus floor and the pavement may be overly high, even when clear kerbside is available. Passengers may find themselves unable to board, or may need to alight at excessive distance from their ideal alighting position.

Fixed stops ensure the following: (a) that the kerbs are high enough for proper deployment of the wheelchair ramp; (b) that the step between footway and bus floor is not overly high for the ambulant disabled or those in charge of prams, toddlers etc; and (c) that, for these users and all others, the bus can always pull in tightly to the kerb, rather than needing to deposit passengers in the road due to obstruction by parked cars. A network based largely on fixed stops is one in which a wheelchair user can set off on a journey with confidence that, wherever they end up alighting, they will be able to do so with ease and dignity.

(2) Personal Security

The differing impact on those with protected characteristics also applies to the consideration of which types of location are suitable for bus stops. Residents opposing bus stops near their homes tend to argue for them being relocated to 'less intrusive' positions in the street; the report argues for avoiding placing them at spots that are secluded and poorly overlooked for the greater sense of personal security this offers passengers, notably vulnerable ones.

In winter months the 7am to 8pm service will be operating in darkness for several hours each day, so the issue of personal security is of relevance. Note that walking to one's car when it is not directly outside the home is a different experience to catching a bus; one does not need to wait on the street for a period of time before getting into one's car. Similar applies to getting out of one's car on a return trip; should the driver feel threatened by the presence of any persons they happen to see in the street, they can drive off or wait for them to move on. The passenger alighting a bus does not have such options. Hence the onus is on those planning the infrastructure to see that it is sited away from positions that are overly secluded for the comfort and security of all, especially the most vulnerable.

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (eg people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts, and, where possible, provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

(1) Physical Accessibility

Older people are more likely than others to suffer with mobility limitations. For those who find walking difficult but who are not classed as disabled, fixed stops minimise the step height when boarding and alighting and ensure passengers never need to step down into or up from the road. For those who find walking longer distances difficult, fixed stops provide certainty as to how far from their destination their bus journey will start and end.

(2) Personal Security

Older people may disproportionately anxious about boarding or alighting at bus stops that have been sited in secluded and poorly overlooked locations.

Younger people – such as children who are old enough to travel independently from adults - may have similar vulnerabilities.

Mitigating actions to be taken

NA

Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include:

Physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

(1) Physical Accessibility

For the ambulant disabled, where they have impaired mobility, fixed stops minimise the step height when boarding and alighting and ensure passengers never need to step down into or up from the road. For those who find walking longer distances difficult, fixed stops provide certainty as to how far from their destination their bus journey will start and end.

The buses in question feature a built-in ramp that can be deployed when wheeled access is required. However, the ramp cannot be deployed safely if the kerbs at the boarding point are too low or if the bus cannot pull up close to the kerbside at all. For this group

fixed stops avoid: them potentially being denied access to the service; or them needing to delay the service while boarding and alighting is improvised, which they may find undignified; or them being left uncertain about the access conditions, potentially deterring them from making their journey.

Although additional parking controls are proposed in Farm Road, these have been reduced in extent where feasible in response to local feedback. In addition, the Local Authorities' Traffic Orders (Exemptions for Disabled Persons) (England) Regulations 2000 provides certain exemptions for blue badge holders from the remaining parking restrictions.

(2) Personal Security

Some disabled people may be disproportionately anxious about boarding or alighting at bus stops that have been sited in secluded and poorly overlooked locations.

Mitigating actions to be taken

NA

Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

No relevant factors identified.

Mitigating actions to be taken

NA

Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected
No relevant factors identified.
Mitigating actions to be taken
NA
Pregnancy and maternity
Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.
Will this change to service/policy/budget have a differential impact [positive or negative] on pregnancy and maternity?
Please provide evidence to explain why this group may be particularly affected
(1) Physical Accessibility Pregnancy can temporarily impair mobility or agility. Fixed stops minimise the step height when boarding and alighting and ensure passengers never need to step down into or up from the road. For those who find walking longer distances difficult, fixed stops provide certainty as to how far from their destination their bus journey will start and end.
(2) Personal Security When pregnant some women may be disproportionately anxious about boarding or alighting at bus stops that have been sited in secluded and poorly overlooked locations.
Mitigating actions to be taken
NA

Race
This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.
Will this change to service/policy/budget have a differential impact [positive or negative] on people of a certain race?
Please provide evidence to explain why this group may be particularly affected
No relevant factors identified.
Mitigating actions to be taken

NA

Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

No relevant factors identified.

Mitigating actions to be taken

NA

Sex

Sex refers to whether you are a man or woman.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on men or women?

Please provide evidence to explain why this group may be particularly affected.

(1) Physical Accessibility

The benefits of easier physical access will apply particularly to those guiding small children or pushing prams or both. Where such childcare duties fall disproportionately to women, then the benefits can be taken to apply disproportionately to women.

(2) Personal Security

Women may be disproportionately anxious about boarding or alighting at bus stops that have been sited in secluded and poorly overlooked locations when travelling alone in the hours of darkness.

Mitigating actions to be taken

NA

Sexual Orientation

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

No relevant factors identified.

Mitigating actions to be taken

NA

Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

Purchasing a car requires, at the time of purchase, a significant sum of money and/or a good credit history. Outlay on running costs (taxation, insurance and maintenance) may arise periodically, rather than on the pay-as-you-go basis that applies to bus travel. Accordingly, the option of bus travel – over the use of the private car - is likely to be more highly valued and frequently used amongst those who are socio-economically disadvantaged, being less likely to own cars.

This group would thus be disproportionately affected by the omission of fixed bus stops or by their placement in poorly overlooked locations with regard to good physical accessibility and minimising anxieties about personal security when travelling alone in the hours of darkness.

Mitigating actions to be taken.

NA

SECTION 4 – Monitoring and Review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

Whilst no negative impacts on protected groups have been identified, the impact of the scheme will be monitored by a combination of feedback from residents, from the bus operator and from Transport for London.

SECTION 5 – Action Plan for Mitigating Actions.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments
None	NA	NA	NA	NA	NA