

Equality Impact Analysis Template

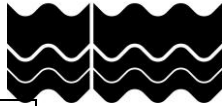
Equality Impact Analysis (EqIA) (or Equality Impact Assessment) aims to make services and public policy better for all service-users and staff and supports value for money by getting council services right first time.

We use EqIAs to enable us to consider all relevant information from an Equality requirements perspective when procuring or restructuring a service, or introducing a new policy or strategy. This analysis of impacts is then reflected in the relevant action plan to get the best outcomes for the Council, its staff and service-users¹.

EqIAs are used to analyse and assess how the Council's work might impact differently on different groups of people². EqIAs help the Council to make good decisions for its service-users, staff and residents and provide evidence that those decisions conform with the Council's obligations under the Equality Act 2010³.

This template sets out the steps you need to take to complete an EqIA for your project. Guidance for sections is in the end-notes. If you have any questions about your EqIA and/or how to complete this form, please use the contact details at the end of this form.

Title of Project/Service/Policy⁴	BSIP Bus Priority Measures: Newhaven Drove Road and Denton Corner
Team/Department⁵	Major Projects & Growth
Directorate	Communities, Economy and Transport
Provide a comprehensive description of your Project (Service/Policy, etc.) including its Purpose and Scope⁶	East Sussex County Council (ESCC) submitted its Bus Service Improvement Plan (BSIP) to Government in October 2021. The East Sussex BSIP actively addresses the National Bus Strategy aiming to enhance bus services by collaborating with Local Transport Authorities, bus operators, community and business voices, bus passengers, and the voluntary and health transport sector. The BSIP sets out ambitious plans to improve the bus network across the county and provide a cleaner, reliable alternative to car travel. It focuses on enhancing the bus network within East Sussex to complement and support wider transport investment across the country and encourage a sustainable mode shift towards bus usage.



The bus priority measures under the capital element of the BSIP funding aim to improve bus reliability, reduce congestion, encourage greater bus use, create safer options for active travel and complement wider initiatives across the county. ESCC proposed seven bus priority measures, which they presented at a public consultation from 31 July to 25 September 2023.

Following engagement with key stakeholders and the outcomes of the consultation, senior ESCC officers met in early November 2023 to determine and agreed which of the seven schemes should be recommended to progress to further design and construction. In doing so, consideration was given to those schemes that bring about the biggest benefits but also the deliverability (construction timescales and statutory processes such as Traffic Regulation Orders (TROs) as well and need for land acquisition).

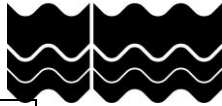
In response to consultation feedback and the indicative cost estimates, it was decided to take the Newhaven BSIP proposals forward, but it would be descoped to remove the proposed eastbound bus lane on Drove Road between Railway Road and Mckinlay Way. Therefore, the Denton Corner and Denton roundabout to Drove roundabout elements are being progressed. A description of these elements is provided below.

A259 The Drove

- New dedicated westbound bus lane along the southern side of the A259 Drove Road, with signalised bus gate on the approach to the A259/McKinlay Way/B2109 Drove Road roundabout.
- The existing shared use footway/cycleway along the southern side of the A259 Drove Road would require some realignment to accommodate the new bus lane. This shared use path would be of a minimum width of 2.5m.
- There would be no change to the existing segregated footway/cycleway along the northern side of the road.

A259 Seaford Road

- The existing 40mph speed limit would extend further east of the A259/B2109 roundabout to accommodate the proposed bus lane and reduced lane width.
- An offline cycleway would be provided off the westbound lane on the approach to the A259/B2109 roundabout, which would link into the existing shared use path on the southern side of the road.
- A new westbound bus lane along the southern side of the A259 Seaford Road, terminating before the



A258 Seaford Road/ A259 The Drove/ B2109 Avis Road roundabout.

- A new bus shelter and post would be located at the western end of the new bus lane, with the existing shared use NCN route running behind this bus area.
- A designated bus way between the arms of the B2109 Avis Road on the A258 Seaford Road/ A259 The Drove/ B2109 Avis Road roundabout. This would assist entrance to the proposed bus interchange on Mount Road.

Mount Road

- A new bus way and interchange entrance, which would provide a bus-only route from the A259/B2109 roundabout into Mount Road, as well as a new link back out onto the A259 Seaford Road.
- The existing bus stop would be relocated further east, with a new shelter provided.
- New pedestrian uncontrolled crossing points would be installed along the proposed bus interchange, as well as along Mount Road.
- The existing entrance to the Mount Road bus interchange would be replaced with landscaping, with the entrance moved to the current existing exit arm.
- Parking restrictions would be included along both sides of Mount Road, as well as a new eastbound bus stop.

Station Road

- The existing southbound bus stop would be relocated further south, with an associated bus cage.

B2109 Avis Road

- A new pedestrian uncontrolled crossing point would be situated north of B2109 Avis Road/Mount Road junction.
- A new eastern footway would connect Avis Road to the new uncontrolled crossing.
- New bus stops would be provided on both sides of the road with associated cage markings.
- The existing shared use path south of the existing toucan crossing would be removed and replaced with landscaping. Instead, pedestrians and cyclists would be required to travel through the proposed bus interchange at Mount Road.

Initial assessment of whether your project requires an EqIA

When answering these questions, please keep in mind all legally protected equality characteristics (sex/gender, gender reassignment, religion or belief, age, disability, ethnicity/race, sexual orientation, marriage/civil partnership, pregnancy and maternity) of the people actually or potentially receiving and benefiting from the services or the policy.

In particular consider whether there are any potential equality related barriers that people may experience when getting to know about, accessing or receiving the service or the policy to be introduced or changed.

Discuss the results of your Equality assessment with the Equality Lead for your department and agree whether improvements or changes need to be made to any aspect of your Project.

	Question	Yes	No	Don't Know
1	Is there evidence of different needs, experiences, issues or priorities on the basis of the equality characteristics (listed below) in relation to the service or policy/strategy area?	Yes		
2	Are there any proposed changes in the service/policy that may affect how services are run and/or used or the ways the policy will impact different groups?	Yes		
3	Are there any proposed changes in the service/policy that may affect service-users/staff/residents directly?	Yes		
4	Is there potential for, or evidence that, the service/policy may adversely affect inclusiveness or harm good relations between different groups of people?	Yes		
5	Is there any potential for, or evidence that any part of the service/aspects of the policy could have a direct or indirect discriminatory effect on service-users/staff/residents?	Yes		
6	Is there any stakeholder (Council staff, residents, trade unions, service-users, VCSE organisations) concerned about actual, potential, or perceived discrimination/unequal treatment in the service or the Policy on the basis of the equality characteristics set out above that may lead to taking legal action against the Council?		No	



7	Is there any evidence or indication of higher or lower uptake of the service by, or the impact of the policy on, people who share the equality characteristics set out above?	Yes		
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If you have answered “YES” or “DON’T KNOW” to any of the questions above, then the completion of an EqIA is necessary.

The need for an EqIA will depend on:

- How many questions you have answered “yes”, or “don’t know” to;
- The likelihood of the Council facing legal action in relation to the effects of service, or the policy may have on groups sharing protected characteristics; and
- The likelihood of adverse publicity and reputational damage for the Council.

Low risk	Medium risk	High risk
If there are any further rounds of consultation, there is a low risk that feedback from certain groups may not be heard. This could be due to the information not being available in a format they understand.	There is a medium risk that if the scheme is to be constructed, construction activities could put people at a disadvantage. This could include longer diversion routes or safety concerns with the construction site.	
There is a low risk that the relocated bus stops may lead to longer journey times, which could negatively impact some groups.	There is a medium risk that the shared use paths could create conflict between users. Some groups are likely to be at a higher risk of conflict, such as those with visual impairments.	

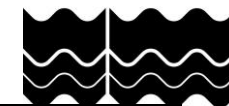
1. Update on previous EqlAs and outcomes of previous actions (if applicable)⁷

What actions did you plan last time? (List them from the previous EqlA)	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)
Not applicable: this is the first plan of this sort.		

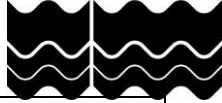
2. Review of information, equality analysis and potential actions

Consider the actual or potential impact of your project (service, or policy) against each of the equality characteristics.

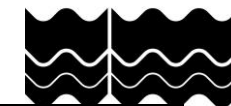
Protected characteristics groups under the Equality Act 2010	What do you know ⁸ ? Summary of data about your service-users and/or staff	What do people tell you ⁹ ? Summary of service-user and/or staff feedback	What does this mean ¹⁰ ? Impacts identified from data and feedback (actual and potential)	What can you do ¹¹ ? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age ¹²	In Newhaven (mid super output layers Lewes 008 and Lewes 009), 19% of the population are aged 65 and over. This is lower than the East Sussex average at 26%, but slightly higher than the England average at 18%. In Newhaven, 36% of the population are aged under 29. This is higher than the East Sussex average at 30%, but the	On 15 September 2023, ESCC presented to and heard questions from the East Sussex Seniors Association. From this, concerns were raised surrounding: • A general safety concern over shared spaces and the nervousness of the ageing population using these with cyclists. • The reliability of	Older passengers may find it confusing if bus stops are relocated, whether these are temporary during construction or permanent as part of the scheme. During construction, older passengers may also find diversion routes confusing and difficult to navigate. They also may find it difficult if the route requires them to walk longer distances. Older or younger passengers may be more at risk when using shared pedestrian/cycle ways, as they may have less awareness (i.e. visual impairments, hard of hearing). Older or younger passengers may have	Since the consultation, the designs have been updated. As part of this, the proposed crossing across the A259 to the west of Denton Roundabout has been removed. Therefore, for users needing to cross the road, they will be required to use the toucan crossings at the roundabout, which is the same as the existing layout.



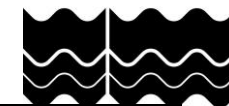
	same as the England average (also 36%). <i>Data taken from 2021 Census.</i>	buses in the area, questioning what was being done to address this. Similarly, there were also comments made about existing bus services and Digital Demand Responsive Transport (DDRT). Such comments were passed onto the Transport Hub. Feedback received from the consultation highlighted a potentially negative impact on both younger and older people as a result of the bus priority scheme. It was thought the proposed crossing facilities west of Denton Roundabout would force bus users to walk further distances to access bus stops, causing them to cut across busy junctions as a more direct route.	safety concerns when travelling to and from the bus stops at night. There may also be concerns about anti-social behaviour on the buses or at the bus stops. Older car drivers may be concerned about reallocating road space to bus lanes, particularly what this might mean for them in terms of congestion. Younger people are more likely to be reliant on public transport, and more likely to have less money, so they could have concerns about fares and bus reliability.	During periods of further consultation, it should be ensured that representatives from younger and older age groups are targeted to hear their views on the scheme. Clear communication should be provided throughout the consultation period and when moving into the next design stages. Online platforms should not be relied upon as older age groups are more likely to not have access to the internet. As part construction planning, appropriate diversion routes need to be considered. This includes making sure they are as short as possible and accessible for all. The proposed usage of safety measures as part of the scheme, including the upgraded pedestrian and cycle crossings, as well as
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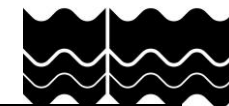
				vegetation clearance, will improve visibility and safety at crossing points. This will help to ensure older and younger passengers can cross the roads safely. The proposed new bus shelters provide benefits for younger and older age groups, giving them an area to rest while waiting for a bus. It should be ensured that signage and appropriate tactile paving is installed along shared use paths to make users aware they are sharing the space. The path should be wide enough to allows cyclists to pass pedestrians and wheelchair users without conflict occurring. Once the scheme is constructed, older and younger passengers who often rely on public transport will benefit from reduced journey times and
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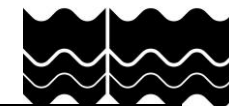
				greater bus reliability.
Disability¹³	Newhaven (mid super output layers Lewes 008 and Lewes 009) has a higher proportion of the population that identify as disabled compared to the averages for East Sussex and England. In Newhaven, 22% of the population identify as disabled compared to 20% of East Sussex and 17% of England. <i>Census 2021</i>. The 2021 Census is the latest comprehensive data we have on the number of people with a disability in the county. Local projections suggest that by 2032, there will be over 130,000 people with a disability in East Sussex. This is an increase of more than 19,000 compared to 2021 figures. Item 5 -	On the 18 August 2023, ESCC attended a disability rights reference group. From this, the following concerns were raised: • Visually impaired groups and the use of shared footways/ cycleways, stating that these are not preferable. • The accessibility of easy-read materials, with a suggestion that images and further simplified language would have been beneficial. • The consultation team were also made aware of a learning disability group that could	During construction, disabled users may find diversion routes/relocated bus stops confusing and may result in them needing to travel longer distances, which could be difficult for some people (i.e. those with mobility issues). Those with disabilities (including physical, learning disability and mental health) may have concerns about safety when travelling to the bus stops, at the bus stops and while on the bus. This could include instances of hate crime. Disabled car drivers may be concerned about the reallocation of road space to bus lanes and what this might mean for them, particularly in terms of congestion. Those with disabilities may be more at risk when using shared use pedestrian/cycle ways. Those with some disabilities mean they could have less awareness of other users (such as cyclists) approaching, particularly if they are visually impaired or hard of hearing. Those in wheelchairs or with mobility aids may also find it more difficult to move out of the way.	Since the consultation, the designs have been updated. As part of this, the proposed crossing across the A259 to the west of Denton Roundabout has been removed. For users needing to cross the road, they will be required to use the toucan crossings at the roundabout, which is the same as the existing layout. Actively target disability groups and representatives during further rounds of consultation to ensure their voices are heard. Maintained clear communication throughout the consultation and moving into next design stage – not just relying on online platforms. There will be a need to



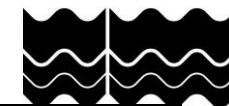
	Appendix 1 - Focus on East Sussex.pdf	be consulted upon. Feedback from the consultation identified that some respondents perceived a negative impact on those with a disability: • Bus priority measures may exacerbate congestion in Newhaven, directly impacting air quality. This could have a disproportionate impact on individuals with disabilities. • Concerns that the proposed crossing facilities west of Denton Roundabout would force bus users to walk further distances to access bus stops causing them to cut across bust junctions as a		ensure the proposed designs are tested for accessibility and safety as the scheme moves through to the next design stage. During construction phases, it should be ensured that all diversion routes/relocated bus stops are accessible for everyone and easy to navigate. The proposed usage of safety measures including the upgraded pedestrian and cycle crossings, as well as vegetation clearance, are designed to make bus stops more accessible for disabled and visually impaired passengers through increased visibility and ease of access. The introduction of bus lanes would greatly benefit disabled passengers as they often rely on public transport. Therefore, they would see the benefits of
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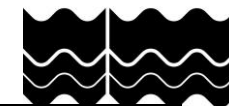
		more direct route.		reduced journey times and increased reliability of services. The proposed scheme is designed to reduce congestion on the roads and thus reducing vehicle emissions, by encouraging greater use of public transport. This will have great health benefits for all but especially those with long-term respiratory conditions. The proposed new bus shelters provide benefits for disabled users, allowing people to rest while waiting for a bus. Live-time bus timetables will also benefit those with disabilities to feel more confident and reassured when travelling by bus. Signage and appropriate tactile paving should be installed along shared use paths, making users aware they are sharing a space. Width of the shared path to be constructed to
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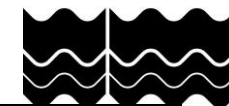
				standards, giving adequate room for cyclists to pass pedestrians and those in wheelchairs/with mobility aids without conflict occurring.
Gender reassignment¹⁴	Within Lewes District, 0.4% of the population indicated their gender identity was different from their sex registered at birth. This is comparable to England, where 0.5% of the population indicated their gender identity was different from their sex registered at birth. <i>Census 2021.</i> There is no data on gender reassignment at a more local level.	Through the feedback received from the consultation, respondents highlighted: Concerns about the lack of perceived safety measures, vandalism protection, and unsafe ambiance as part of the measures. This could disproportionately impact people within this group, particularly when using the service at night due to instances of hate crime.	Those who have a gender identity that is different from their sex registered at birth may have concerns about safety when travelling to the bus stops, waiting at the bus stops and while on the bus, due to the fear of hate crime. This is more likely to take place in isolated areas and at night.	Actively target representatives of this group during periods of further consultation to ensure their voices were heard. As the scheme design progresses, it should be ensured that all footways/cycleways are lit and that the routes are visible from the road to provide natural surveillance. As the scheme design progresses, it should also be ensured that bus stops are designed to allow for 360-degree visibility. This means installing transparent bus shelters and avoiding other obstructions like large advertisements.



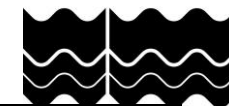
				The proposed reallocation of road space to introduce westbound bus lanes improves safety for vulnerable passengers as bus services become more reliable. Having more reliable services results in users needing to spend less time waiting at bus stops. Live-time bus timetables will also benefit those in this group to feel more confident and reassured when travelling by bus.
Pregnancy and maternity¹⁵	In 2022 there were 62 live births in Newhaven Town (1).	Through feedback received from the consultation, respondents highlighted: • Bus priority measures may exacerbate congestion in Newhaven, directly impacting air quality. This could have a disproportionate impact on pregnant	During construction, pregnant women and those on maternity may find it difficult if the diversion routes result in them needing to travel longer distances. The same applies to any relocated bus stops. Women who are pregnant and those on maternity may be concerned about the reallocation of road space to bus lanes and what this might mean for them, particularly in terms of congestion. Those with pushchairs and young children may also find it more difficult to move out of the way when travelling on a shared use path.	Since the consultation, the designs have been updated. As part of this, the proposed crossing across the A259 to the west of Denton Roundabout has been removed. For users needing to cross the road, they will be required to use the toucan crossings at the roundabout, which is the same as the existing layout. During further periods of



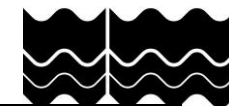
		individuals. - Concerns about the lack of perceived safety measures, vandalism protections, and unsafe ambiance implemented under the measures. This could disproportionately impact pregnant passengers. - Concerns that the proposed crossing facilities west of Denton Roundabout will force bus users to walk further distances to access bus stops causing them to cut across bust junctions as a more direct route. This could disproportionately impact pregnant passengers.		consultation, it should be ensured that the social benefits of the proposals are made clear. This includes making it easier and quicker to travel by bus to key destinations, including children's play groups. During construction, it should be ensured that diversion routes are as short as possible and are easy to navigate. The proposed reallocation of road space to introduce westbound bus lanes would improve the reliability of the bus services. This benefits pregnant passengers and those with children as they experience shorter journey times and more reliable services. The proposed upgrade to bus stops, including the installation of bus shelters, are designed to make waiting for a bus more comfortable. This
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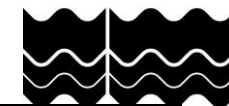
				particularly benefits pregnant passengers. Pregnant women and those on maternity will benefit from reduced bus journey times and improved reliability. By making journeys on the bus easier, it may reduce isolation experienced by some new parents, particularly those who are unable to drive. Width of the shared path to be constructed to standards, giving adequate room for cyclists to pass pedestrians and those with young children and pushchairs.
Race (ethnicity)¹⁶ Including migrants, refugees and asylum seekers	Newhaven (mid super output layers Lewes 008 and Lewes 009) has 93% of the population that identify as White. This is comparable to the average for East Sussex at 94% but is significantly larger than the average for England	Through feedback received from the consultation, respondents highlighted: Concerns about the lack of perceived safety measures, vandalism protections, and	During periods of further consultation, there could be issues for people who do not have English as a first language. They may find it hard to read the information and understand the proposals, as well as providing their feedback. Those who identify as an ethnic minority may have concerns about safety when travelling to the bus stops, waiting at the bus stops and while on the bus, due to the	During periods of further consultation, it should be ensured the safety benefits are made clear. This includes improving the reliability of the bus services which reduces the amount of time waiting at bus stops. It should also be ensured



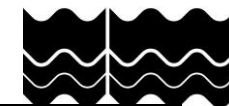
	at 81%. In Newhaven: 2% identified as Asian, Asian British or Asian Welsh; 1% identified as Black, Black British, Black Welsh, Caribbean or African; 3% identified as Mixed or Multiple ethnic groups; and 1% identified as other ethnic group. <i>Census 2021</i>	unsafe ambiance implemented under the proposals. This could disproportionately impact ethnic minorities, especially when travelling at night due to instances of hate crime.	fear of hate crime. This is more likely to take place in isolated areas and at night.	that consultation materials can be made available in other formats (i.e. different languages), upon request. As the scheme design progresses, it should be ensured that all footways/cycleways are lit and that the routes are visible from the road to provide natural surveillance. As the scheme design progresses, it should also be ensured that bus stops are designed to allow for 360-degree visibility. This means installing transparent bus shelters and avoiding other obstructions like large advertisements. Proposed reallocation of road space to introduce both westbound bus lanes improves safety for ethnic minority passengers as bus services become more reliable. Having more reliable services results in users needing to spend
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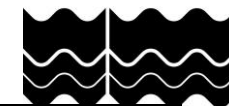
				less time waiting at bus stops.
Religion or belief¹⁷	Newhaven (mid super output layers Lewes 008 and Lewes 009) has 53% of the population that report as having “no religion”. This is higher than both East Sussex at 45% and England at 37%. A total of 37% of people within Newhaven said they are Christian, which is lower than both East Sussex and England at 46% each. In Newhaven: 1% said they are Muslim and a further 1% said they are of another religion. The other religions make up less than 1% of the Newhaven population. <i>Census 2021</i>	Through the feedback received from the consultation, respondents highlighted: Concerns about the lack of perceived safety measures, vandalism protections, and unsafe ambience implemented under the proposals. This could disproportionately impact religious minorities particularly, when using the service at night due to instances of hate crime.	During construction of the scheme, noise and associated construction work could impact particular religious groups for worshiping. Those of certain religions or beliefs may have concerns about safety when travelling to the bus stops, waiting at the bus stops and while on the bus, due to the fear of hate crime. This is more likely to take place in isolated areas and at night.	During periods of further consultation, it should be ensured the safety benefits are made clear. This includes improving the reliability of the bus services, which reduces the amount of time waiting at bus stops. Also, actively engage with religious groups especially those who have places of worship adjacent to proposed bus priority schemes, to ensure their voices are heard. During construction planning, ensure the timing of construction is communicated to everyone. Work with religious groups/places of worship to agree appropriate timings of construction activities. Proposed reallocation of road space to introduce westbound bus lanes



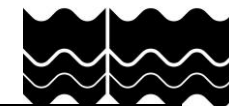
				improves safety for ethnic minority passengers as bus services become more reliable. Having more reliable services results in users needing to spend less time waiting at bus stops. As the scheme design progresses, it should be ensured that all footways/cycleways are lit and that the routes are visible from the road to provide natural surveillance. As the scheme design progresses, it should also be ensured that bus stops are designed to allow for 360-degree visibility. This means installing transparent bus shelters and avoiding other obstructions like large advertisements.
Sex¹⁸	Newhaven (mid super output layers Lewes 008 and Lewes 009) has 51% of the population that are female and 49%	Through the feedback received from the consultation, respondents highlighted:	Women are more likely to have caring responsibilities that may require them to make multiple short journeys or 'chain-journeys' during a day, (for example to drop children off at school, visit an elderly parent	During periods of further consultation, seek opportunities for women to feedback on the proposed scheme. Offer alternative



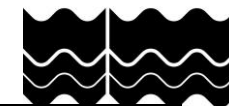
	that are male. This is comparable to both East Sussex and England. In East Sussex, 52% of the population are female while 48% are male. In England, 51% are female while 49% are male. <i>Census 2021</i>	Concerns about the lack of perceived safety measures, vandalism protections, and unsafe ambiance implemented under the proposals. This could disproportionately impact female passengers particularly when using the service at night due to instances of hate crime.	and shop for food). This can mean they do not take typical commuting routes. Women are more likely to be the victims of sexual harassment and sexual abuse while waiting for, and on, public transport.	options for providing feedback and be mindful of certain times of any in-person events (e.g. school pick up time) where women are more likely to have caring responsibilities. It should also be ensured the safety benefits are made clear. This includes improving the reliability of the bus services and making bus journeys quicker. Proposed reallocation of road space to introduce westbound bus lanes improves safety for women as bus services become more reliable. Having more reliable services results in users needing to spend less time waiting at bus stops. Having quicker journey times will mean users will also spend less time on the bus, meaning there is less opportunity for hate crimes/sexual harassment to take place.
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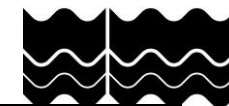
				As the scheme design progresses, it should be ensured that all footways/cycleways are lit and that the routes are visible from the road to provide natural surveillance. As the scheme design progresses, it should also be ensured that bus stops are designed to allow for 360-degree visibility. This means installing transparent bus shelters and avoiding other obstructions like large advertisements.
Sexual orientation¹⁹	Within Newhaven, 89% of residents aged 16 and over identify as straight, which is the same as East Sussex and England. A total of 2% of the population within Newhaven identify as gay or lesbian, which is also the same as England and East Sussex. There are 2% of	Through the feedback received from the consultation, respondents highlighted: Concerns about the lack of perceived safety measures, vandalism protections, and unsafe ambience implemented under the	Those who identify as LGBTQ+ may have concerns about safety when travelling to the bus stops, waiting at the bus stops and while on the bus, due to the fear of hate crime. This is more likely to take place in isolated areas and at night.	During periods of further consultation, seek opportunities for LGBTQ+ groups to feedback on the proposed schemes consultation. It should also be ensured the safety benefits are made clear. This includes improving the reliability of the bus services and making bus journeys



	people within Newhaven that identify as bisexual, which is slightly higher than England and East Sussex which are both at 1%. <i>Census 2021</i>	proposals. This could disproportionately impact LGBTQ+ passengers particularly when using the service at night due to instances of hate crime.	quicker. Proposed reallocation of road space to introduce westbound bus lanes improves safety for those who identify as LGBTQ+, as bus services become more reliable. Having more reliable services results in users needing to spend less time waiting at bus stops. Having quicker journey times will mean users will also spend less time on the bus, meaning there is less opportunity for hate crimes to take place. As the scheme design progresses, it should be ensured that all footways/cycleways are lit and that the routes are visible from the road to provide natural surveillance. As the scheme design progresses, it should also be ensured that bus stops are designed to allow for 360-degree visibility. This means installing
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				transparent bus shelters and avoiding other obstructions like large advertisements.
Marriage and civil partnership²⁰	Within Newhaven, 38% of the population have never been married or in a civil partnership, which is the same proportion as England, but higher than East Sussex at 32%. A total of 41% of the Newhaven population are married or in a civil partnership, which is lower than both England (45%) and East Sussex (47%).	No feedback related to this protected characteristic group has been received.	It is not considered that this protected characteristic group will experience disproportionate, negative, neutral or positive impact by the proposals.	It is not considered that this protected characteristic group will experience disproportionate, negative, neutral or positive impact by the proposals.
Armed Forces²¹	Within Newhaven, 3% of people reported that they had previously served in the UK regular armed forces, while 1% had previously served in reserve armed forces and 0.3% had previously served in both regular and reserve armed forces.	No feedback related to this protected characteristic group has been received.	It is not considered that this protected characteristic group will experience disproportionate, negative, neutral or positive impact by the report.	It is not considered that this protected characteristic group will experience disproportionate, negative, neutral or positive impact by the report.

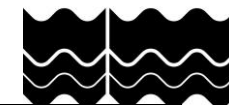


	<i>Census 2021</i>			
Impacts on community cohesion²²	N/A	No feedback received related to community cohesion.	There could be some positive impacts on community cohesion with improvements to bus stops, including the addition of bus shelters. These will provide a more comfortable experience while waiting for the bus, where different users can come together.	As the scheme design progresses, it should be ensured that all footways/cycleways are lit and that the routes are visible from the road to provide natural surveillance. This would help to prevent any negative experiences that could arise from different members of the community coming together. As the scheme design progresses, it should also be ensured that bus stops are designed to allow for 360-degree visibility. This means installing transparent bus shelters and avoiding other obstructions like large advertisements.

Additional categories

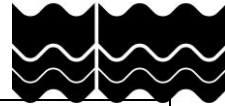
(identified locally as potentially causing / worsening inequality)

Characteristic	What do you know ²³ ?	What do people tell you ²⁴ ?	What does this mean ²⁵ ?	What can you do ²⁶ ?
Rurality²⁷	The proposed bus priority scheme is situated in Newhaven, an urban area. Therefore, this characteristic is not relevant.			
Carers	The 2021 Census for Newhaven highlighted that 10% of the population provided unpaid care compared to the national average of 9%. A total of 5% of Newhaven's population provided 19 hours or less of unpaid care per week, 2% provided 20-49 hours of unpaid care a week and 3% provided 50 or more hours of unpaid care a week.	Through the feedback received from the consultation, some respondents highlighted a perceived negative impact of the bus priority schemes on carers and care givers.	Carers have responsibilities that may require them to make multiple short journeys or 'chain-journeys' during a day. This can mean they do not take 'usual' commuting routes. Carers may also be reliant on car travel and be concerned about road space allocation in the proposals.	Actively engage with carer groups and representatives during the consultation period to ensure their voices are heard.



Other groups that may be differently affected (including but not only: homeless people, substance users, care leavers – see end note) ²⁸				
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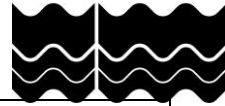
Assessment of overall impacts and any further recommendations²⁹ - include assessment of cumulative impacts (where a change in one service/policy/project may have an impact on another)
Overall, the proposed BSIP scheme for Newhaven is expected to have a positive impact on all protected groups referenced above. The scheme would provide improvements to bus stops, including the provision of bus shelters and real time passenger information. This allows people to rest while waiting for the bus, which benefits those in younger and older age groups, those with some disabilities, and women who are pregnant. The provision of real time passenger information allows passengers to see how long they must wait for the next bus, which could reduce the risk of hate crimes to some minority groups. The scheme would also improve bus journey time reliability through the provision of bus lanes, which helps to reduce the amount of time people are waiting for a bus as well as the amount of time they spend on the bus. This again can help to reduce the risk of hate crime to some minority groups. There would be no changes to the existing segregated path of the northern side of the A259, while on the southern side, the path would need to be repositioned but would remain as shared use. There are concerns that these paths could negatively impact some protected groups, including younger and older people, as well as those with some disabilities. The impact could occur when users are not aware of the shared space or cannot hear or see fast moving cyclists approaching. This could result in a dangerous collision. It should therefore be ensured that during detailed scheme design, appropriate measures are in place to make these spaces as safe as possible for all users. This includes the provision of tactile paving to mark the start and end of the shared space, as well as adequate signage and surface markings. Concerns have been identified relating to any further consultations on the scheme. It could be easy for some groups to be excluded as part on the consultation. This includes a lack of information in appropriate formats, not publicising the consultation through a range of channels, and not targeting certain groups for their feedback. It should therefore be ensured that the consultation is promoted through a range of channels (both online and offline), materials available in a range of formats, and representatives from protected groups are targeted for their feedback. Consideration also needs to be given to protected groups during construction. Some could be impacted by diversion routes and relocated bus stops,



particularly if it results in their journey being longer. This impacts those with mobility issues as well as visual impairments. Therefore, diversion routes need to be as short as possible and relocated bus stops close to the existing bus stop. They should also be accessible for all, including making sure there are ramps/dropped kerbs as well as being well lit.

3. List detailed data and/or community feedback that informed your EqIA

Source and type of data (e.g. research, or direct engagement (interviews), responses to questionnaires, etc.)	Date Accessed	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)
..\Newhaven_Town.xlsx (1)	11/7/24		
Ethnic group - Census Maps, ONS (2)	11/7/24		
East Sussex - Public Consultation Brochure FINAL (3)	5/7/24		

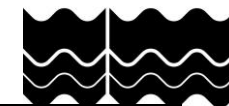


..\Newhaven feasibility report extract .pdf (4)	11/7/24		
State of the County 2021 Focus on East Sussex: Appendix 1 Item 5 - Appendix 1 - Focus on East Sussex.pdf	7/7/23		Have sourced data elsewhere
Ons Census 2021: East Sussex: East Sussex facts and figures - E10000011 - ONS	7/7/23		
Chartered Institution of Highways and Transportation: How can we make public transport safe for women and girls? CIHT	7/7/23		

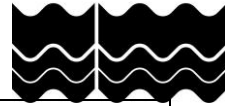
4. Prioritised Action Plan³⁰

NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.

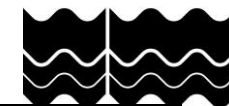
Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
During further rounds of consultation to present updated scheme designs, some groups may not be able to read or understand the consultation materials. This can lead to their feedback not being captured. Groups affected: Race, disability	Ensure all the materials are written in simple, easy to understand language, as well as being available in other formats such as other languages, large-text, and Braille.	Everyone can read and understand the information presented during the consultation, enabling them to make an informed decision on the proposals.	Responses received from those of different races and with a range of disabilities. No negative feedback received regarding the accessibility of the consultation materials.	Before next consultation period if there is one.
During further rounds of consultation to present updated scheme designs, some groups may have difficulty accessing in-person consultation events. This could be due to the venue's location or access within the building. Groups affected: Age,	Ensure a risk assessment is undertaken to check the venue is appropriate for all users. This includes being in an area that is easily accessed through public transport and has nearby parking (including disabled spaces). The building itself will need to be easily accessible for those with	Everyone is able to easily access the in-person events, enabling them to view the proposals and speak to members of the project team.	Consultation events that are well attended. No negative feedback received regarding the accessibility of the consultation events.	Before next consultation period if there is one



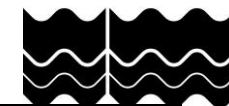
disability, pregnancy & maternity	mobility aids and pushchairs (i.e. no steps), have toilets (men, women and disabled) and have seating available. Online events offer an alternative to attending in-person events, but these should be provided alongside in-person events.			
During construction of the scheme, diversion routes/changes to access may increase travel distance and extend through unfamiliar areas. Groups affected: Age, disability, pregnancy & maternity, sex	Development of a Construction Management Plan and works in accordance with Chapter 8 Traffic Signs Manual and the Streetworks "Red Book" will mitigate construction impacts. This includes keeping diversion routes as short as possible along a well maintained (smooth surface, dropped kerbs) and well-lit route. The provision of adequate signage to allow people to navigate their way through the diversion. Information on construction timescales and the locations of the works should be communicated	A diversion route that is as short as possible and is safe to use at all times of the day. Everyone knows and understands the diversion route, prior to construction. The route can be easily navigated by all without any difficulties.	No negative feedback received from users of the diversion routes. No instances of accidents or crime taking place along the diversion routes.	Prior to construction



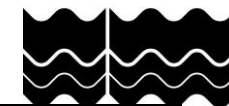
	through a range of channels, including online and hard copy (for those who do not have access to the internet).			
During construction of the scheme, temporary bus stop closures may increase travel distance. Groups affected: age, disability, pregnancy & maternity	Development of a Construction Management Plan and works in accordance with Chapter 8 Traffic Signs Manual and the Streetworks “Red Book” will mitigate construction impacts. This includes adequate provision of signage to indicate the closure of the bus stop and directions to the nearest bus stop that is operating. This should not be located too far from the existing bus stop so it can be easily accessed by everyone. Temporary bus stop closures should be clearly communicated well in advance by a range of channels, including both online and hard copy.	An operating bus stop that is not far from the stop that is temporarily closed and can be easily accessed by everyone. Everyone knows and understands the temporary closure, prior to construction. The route to the temporary bus stop can be easily navigated by all without any difficulties.	No negative feedback received from users of the temporary bus stop closure. No reductions in bus patronage during the construction phase.	Prior to construction
Construction works may generate significant noise. This can impact certain	Development of a Construction Management Plan and works in	Construction works that do not impact people’s daily activities	No negative feedback received from local residents on	Prior to construction



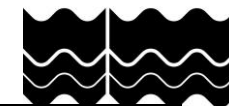
groups who may be sensitive to noise, or those that need to rest during the day. Noise disruption can also affect those who worship at different times of the day. Groups affected: age, disability, pregnancy & maternity, religion/belief	accordance with Chapter 8 Traffic Signs Manual and the Streetworks “Red Book” will mitigate construction impacts. Where the construction work is near residential areas, ensure noise is kept to a minimum. Where significant noise is needed, ensure this is during the day with limited work taking place in the early morning or late evening. Local residents to be given advanced notice of the construction works and will be kept regularly updated on the timescales.	including work, worship, and sleep. Everyone knows of the construction timings in advance so they can plan accordingly.	construction noise.	
Safety concerns relating to the construction site. If the site is not secure, young children and those with some disabilities may enter the construction site. Groups affected: Age, disability, pregnancy & maternity	Development of a Construction Management Plan and works in accordance with Chapter 8 Traffic Signs Manual and the Streetworks “Red Book” will mitigate construction impacts. Ensure the construction site is fully secured through fencing and warning signs and is locked when no	Everyone remains safe when travelling near to the construction site, with no accidents/incidents taking place.	No instances of accidents taking place within, and surrounding, the construction site. No concerns raised regarding the potential for an accident to take place.	Prior to construction



	construction workers are present. If construction machinery and vehicles are left on site, ensure these are also secured within the locked site so that no unauthorised personnel can gain access.			
The path of the southern side of the road would remain as shared use. Shared use paths can also result in conflict between users due to the differences in speed they travel at. Some groups are likely to travel slower than the usual pedestrian, increasing this conflict, and these groups can also have less awareness of approaching cyclists. Groups affected: Age, disability, pregnancy & maternity	The widths of the shared use paths have been designed in accordance with LTN 1/20. Groups that could be most at risk along these shared use paths (including older and younger people, those with disabilities such as visually impaired) should be consulted with and asked for their input on how they can be designed as safe as possible. It will be ensured that adequate signage, surface markings, and tactile paving will be provided to allow all users to know they are sharing the space as well as indicating when the shared space starts and	Shared paths where everyone feels safe and comfortable to travel along. Pedestrians and cyclists travel together in harmony with no conflicts occurring.	No instances of accidents taking place along the shared use paths. An increase in people walking and cycling within the area.	During design phase/ consultation (if there is another round)



	stops.			
As part of the proposals, some bus stops are intending to be relocated. This may confuse some users, including those with certain disabilities as well as younger and older people. They may not be aware of where the bus stop has been relocated to, or it may result in them needing to travel a longer distance to reach the bus stop. Groups affected: age, disability	Permanent bus stop relocations should be clearly communicated well in advance by a range of channels, including both online and hard copy. Once constructed, clear signage should be provided to make users aware of where the new bus stop is. Adequate facilities should be provided at the bus stops, including ample room for passengers to wait, seating for those who find it difficult to stand, and real time information.	Relocated bus stops that can be easily accessed by everyone without any difficulties. Everyone knows and understands the bus stop relocation prior to construction.	An increase in bus patronage. No negative feedback received from local residents on the newly relocated bus stops.	During design phase
As part of the proposals, parking restrictions are intended along Mount Road. This could make it difficult for people to park outside of their property, which adversely affects those with disabilities, older people, and those who are pregnant or have young children. The parking	There is no removal of any existing disabled parking bays. The intended parking restrictions are only proposed for a small section, therefore, there is alternative on-street parking located only a short distance away.	Intended parking restrictions are clearly communicated to local residents well in advance of them being implemented. Residents will still be able to park their vehicle close to their property, without much of an increase on their travel distance.	No instances of vehicles not obeying the parking restrictions. No negative feedback received relating to residents not being able park near their property.	During design/ consultation phase (if there is another round)



restrictions could result in people having to park further away than they currently do. Groups affected: age, disability, pregnancy & maternity	The parking restrictions will be clearly communicated to local residents well in advance through Traffic Regulation Orders (TROs). They will detail the nature and extent of the proposed traffic restrictions.			
Hate crime or sexual harassment occurring within less visible areas, such as behind bus stops. Groups affected: Disability, sexual orientation, race, religion, sex	During the scheme design, look to reduce the amount of less visible areas. This includes transparent bus stops and vegetation clearance. Lighting should also be provided along the paths and at bus stops. Including real time passenger information would also help to reduce instances occurring, as passengers know how long they have to wait for the next bus.	All groups feel safe and comfortable while waiting at the bus stops and travelling within the area.	No instances of hate crime or sexual harassment taking place. No negative feedback received on people feeling unsafe within the area.	During design phase

(Add more rows as needed)

EqIA sign-off: (for the EqIA 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 Analysis:

Date:

Directorate Management Team rep or Head of Service:

Date:

Equality lead:

Date:

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 the Council's duties under the Equality Act 2010 and ensure they comply with them appropriately in their daily 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, rigorous part of your decision-making process and influence the process.
- **Sufficient Information:** you must assess what information you have and what is further needed to give proper consideration.
- **No delegation:** the Council is responsible for ensuring that any contracted services, which are provided on its behalf need also to comply with the same legal obligations under the Equality Act of 2010. You need, therefore, to ensure that the relevant contracts make these obligations clear to the supplier. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty. It applies when a policy or service is developed/agreed, and when it is implemented and reviewed.
- **Proper Record Keeping:** to prove that the Council has fulfilled its legal obligations under the Equality Act you must keep records of the process you follow and the impacts identified.

NB: Filling out this EqlA in itself does not meet the requirements of the Council's equality duty. All the requirements above must be fulfilled, or the EqlA (and any decision based on it) may be open to challenge. An EqlA therefore can provide evidence that the Council has taken practical steps comply with its equality duty and provide a record that to demonstrate that it has 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 actual and potential impact of our activities on people who share any of the legally ‘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 the nature of your project, who it might affect, those groups’ vulnerability, and the seriousness of any potential impacts it might have. We use this EqlA template to gather information and assess the impact of our project in these areas.

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

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

³ EqlAs are always proportionate to:

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

The greater the potential adverse impact of the proposed service or policy on a protected group (e.g. disabled people), the more thorough and demanding our process must be so that we comply with the Equality Act of 2010.

⁴ **Title of EqIA:** This should clearly explain what service / policy / strategy / change you are assessing

⁵ **Team/Department:** Main team responsible for the policy, practice, service or function being assessed

⁶ **Focus of EqIA:** 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 Analysis (EqIA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the service, policy, strategy, practice, or function?

- Who implements, carries out or delivers the service, policy, strategy, practice, 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 service, policy, strategy, practice, 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, are required and what should the benefits be?
- What do existing or previous reviews of the service, policy, strategy, practice, or function indicate to you?
- What is the reason for the proposal, or change (financial, service scope, legal requirements, etc)? The Equality Act requires us to make these clear.

⁷ **Previous actions:** If there is no previous EqIA, or this assessment is for a new service, then simply write 'not applicable'.

⁸ **Data:** Make sure you have enough information to inform your EqIA.

- What data relevant to the impact on protected groups of the policy/decision/service is available?⁸
- 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 protected characteristics 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 / communities?

⁹ **Engagement:** You must engage appropriately with those likely to be affected to fulfil the Council's duties under the Equality Act.

- What do people tell you about the services, the policy or the strategy?
- 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 different perspectives can be captured and considered.
- Identify any gaps in who has been consulted and identify ways to address this.

¹⁰ Your EqIA must get to grips fully and properly with actual and potential impacts.

- The Council's obligations under the Equality Act of 2010 do not stop you taking decisions, or introducing well needed changes; however, they require that you take decisions and make changes 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 protected 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?

¹¹ Consider all three aims of the Act: removing barriers, and also identifying positive actions to be taken.

- 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 address 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 EqIA which has attempted to airbrush the facts is an EqIA that is vulnerable to challenge.

¹² **Age:** People of all ages

¹³ **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. Carers of disabled people are protected within the Act by association.

¹⁴ **Gender Reassignment:** In the Act a transgender person is someone who proposes to, starts or has completed a process to change his or her gender. A person does not need to be under medical supervision to be protected

¹⁵ **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

¹⁶ **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.

¹⁷ **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.

¹⁸ **Sex:** Both men and women are covered under the Act.

¹⁹ **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

²⁰ **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.

²¹ **Armed Forces:** The Armed Forces Act 2021 aims to help prevent service personnel, veterans and their families being disadvantaged when accessing public services. The new duty applies to certain housing, education or healthcare functions, but it is good practice to ensure consideration of impacts on current or former members of the armed forces, as well as their families.

²² **Community Cohesion:** potential impacts on how well people from different communities get on together. The council has a legal duty to foster good relations between groups of people who share different protected characteristics. Some actions or policies may have impacts – or perceived impacts – on how groups see one another or in terms of how the council's resources are seen to be allocated. There may also be opportunities to positively impact on good relations between groups.

²³ **Data:** Make sure you have enough information to inform your EqIA.

- What data relevant to the impact on protected groups of the policy/decision/service is available?²³
- 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 protected characteristics 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?

²⁴ **Engagement:** You must engage appropriately with those likely to be affected to fulfil the Council's duties under the Equality Act .

- What do people tell you about the services, the policy or the strategy?
- 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 different perspectives can be captured and considered.
- Identify any gaps in who has been consulted and identify ways to address this.

²⁵ Your EqIA must get to grips fully and properly with actual and potential impacts.

- The Council's obligations under the Equality Act of 2010 do not stop you taking decisions, or introducing well needed changes; however, they require that take decisions and make changes 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 protected 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?

²⁶ Consider all three aims of the Act: removing barriers, and also identifying positive actions to be taken.

- 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 address 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 EqIA which has attempted to airbrush the facts is an EqIA that is vulnerable to challenge.

²⁷ **Rurality:** deprivation is experienced differently between people living in rural and urban areas. In rural areas issues can include isolation, access to services (eg: GPs, pharmacies, libraries, schools), low income / part-time work, infrequent public transport, high transport costs, lack of affordable housing and higher fuel costs. Deprivation can also be more dispersed and less visible.

²⁸ **Other groups that may be differently affected:** this may vary by services, but examples include: homeless people, substance misusers, people experiencing domestic/sexual violence, looked after children or care leavers, current or former armed forces personnel (or their families), people on the Autistic spectrum etc.

²⁹ **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?

³⁰ **Action Planning:** The Council's obligation under the Equality Act of 2010 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.