

Appendix C – EQUALITY IMPACT ASSESSMENT

Background

An Equality Impact Assessment (EQIA) is an assessment of the Council's services and policies for their impact on equality of opportunity and is a statutory duty flowing from the Race Relations (Amendment) Act 2000 and the Disability Discrimination Act 1995. The Council has agreed that all assessments for impact will extend to other equality and community groups.

The London Borough of Hounslow's Local Implementation Plan (LIP) has been assessed against the five strategic equality and diversity objectives defined by the Council's Equality of Opportunity and Diversity Policy. The Council's guidance and toolkit for undertaking EQIAs sets out the questions to consider in the process. A number of local strategies are also relevant. These include the Council's Equal Opportunities and Diversity Policy, the Council's Corporate Equality and Community Cohesion Plan 2005-2008, Children's Participation Strategy, Customer Services Strategy, Corporate Communications Strategy, Access Hounslow and the Council's strategy on e-government.

As the LIP is applicable to all individuals, groups and sections of the community, it also impacts on the equality categories and their subgroups. These are defined as age groups, ethnic minority groups, disabled groups, faith groups, gender as well as lesbian, gay, bisexual and transgender (LGBT) groups. The LIP identifies all of these as hard-to reach groups and specifically seeks to engage them. The last two groups in this list have very few distinctive patterns of transport or needs that are not addressed by measures to improve equality among the other groups.

The London Borough of Hounslow has a resident population of approximately 212,000, around 108,000 of which are female and 104,000 are male. 11.5% of residents in Hounslow are aged over 65, while 23.2% are under 18 years of age. The majority are of White British origin. The second largest ethnic group in Hounslow is Asian and Asian British, many of who are Indian. Correspondingly, just over half of the population is Christian, followed by Muslim, Sikh and Hindu as the next largest faith groups in the borough. With over 120 languages spoken in the borough, Hounslow is one of the most culturally diverse boroughs in London.

Key Elements of the LIP Strategy

The document sets out five objectives along with the existing UDP transport policies which provide the principles for the London Borough of Hounslow's Local implementation Plan for the Transport Environment. The principles are in line with the Council's Executive Business Plan and the Second Community Plan

Implementation of the London Borough of Hounslow's Local implementation Plan for the Transport Environment will have a positive effect on the community as it :

- Work to improve the safety and accessibility of the public realm;
- Reduce road traffic casualties and ensure the roads are safe for all;
- Improve maintenance of the transport infrastructure;
- Work to improve the quality of bus services throughout the Borough;
- Work with partners to improve access to the rail and underground network such as better pedestrian and cycle access parking; good interchanges with bus services;
- Continue and enhance the provision of community transport;
- use the planning system to reduce the need to travel and the length of trips;
- improve walking and cycling networks and facilities;
- promote travel awareness and the introduction of Travel Plans.

The Equalities Impact Assessment

The Final LIP has been informed by external, internal and Member consultation. The document has been cross referenced to existing practices of consultation within the Borough. It has been presented to Disability Community Forum (DCF), the Local Strategic Partnership, all area committees and the Councils Executive.

The majority of changes to the LIP have been the result of the consultation response from Transport for London received in October 2005. There were no changes to the objectives and policies and the majority of the changes were to clarify proposal and funding details.

Objective One – Promoting Community Leadership and Community Cohesion

Task: Analyse the impact of your policy with regard to Strategic Equality and Diversity Objective One.

Questions to consider	Tick when addressed	Comments
What are the aims of the policy/service?	√	The Policy set out the five year strategy for the transport environment in line with the Mayor's Transport Strategy. This is the final version which is post consultation.
What needs is the policy/service designed to meet?	√	To coordinate the development and improvement of transport in Hounslow. It sets out a five year plan (Subject to funding) including detailed proposals. These are broken down to area committee level.
How do you think that your policy/service currently meets the needs of	√	This will aim to meet the variety of needs in relation to transport in a joined up way. Five policy objectives have been

different communities in Hounslow?		developed for the plan – safe, accessible, green, efficient, attractive. The accessibility objective aims to highlight the need to ensure that transport is developed in a variety of ways. This includes: <ul style="list-style-type: none"> • Physical access –eg: lowered kerbs, boarding transport, location/ frequency of services, access to cars. • Availability of Information • Financial support to vulnerable people.
Do you think that your policy/service specifically contributes to promoting equality, diversity and community cohesion in Hounslow? If so, how?	√	With accessibility as a key theme it looks to support the promotion of diversity in the broadest sense. An exercise to identify whether there is an ethnicity impact on casualty reduction has been added since the draft.
Is there any evidence of how your policy/service contributes to improving the quality of life (how does it do so?) for specific ethnic communities or other client groups?	√	The policy draws a direct link between this draft document and the Council's Equality policy

Can aspects of the policy lead to tensions between ethnic groups and adversely affect community cohesion and the promotion of race equality and the Council's equal opportunities and diversity commitments?	√	No
Do aspects of your policy exclude or negatively impact upon sections of the community and therefore lead to a perception that your policy benefits some groups only? How can you stop such a perception from arising?	√	The policy has been designed to have no direct negative impact on any section of the community. It is acknowledged that implementation may have temporary negative impacts on accessibility. The introduction of Network Management leading from the Traffic Management Act 2004 should improve the overall communication of implementation programmes leading from the LIP. Communication about the availability of services needs to be made as broadly as possible in order to ensure that those who wish to use different methods of transport are well informed about their options
What about indirect discrimination – see full guidance.	√	Not applicable – directly addresses potential sources of discrimination
Verify your initial view through consultation.	√	Consultation complete and document has successfully completed the Executive reporting process.

Who did you consult?	√	<p>A range of questions on transport use/needs/wants were put to the Residents' Panel and this data has been used in developing the strategy.</p> <p>The list of consultees for the draft document includes: Councillors, LSP, the Public (through Libraries), CMT, Scrutiny, Statutory consultees, SWELTRAC and WLTS, surrounding boroughs, TfL, Area Committee Co-optees and community groups including Disability Community Forum, HREC, Outwest, Disability Network Hounslow</p>
What data/information did you use?	√	Draft and Final document and consultation questionnaire and responses.
What further data/information do you need to carry out the analysis?	√	<p>All information for analysis has been gathered and technical amendments to the document.</p> <p>The opportunity to comment was offered to every resident.</p> <p>Analysis of the residents' panel data was carried out by the consultants who manage the Panel. This information was key in informing the consultation draft.</p> <p>Responses to the LIP consultation came through several ways.</p> <p>The consultation did not draw many responses from the general public even though it was sent to every home in the Borough through HM Magazine. The responses received were positive in respect to the objectives, policies and proposals where specific issue locations were identified these have been added to the Area Action Plans in appendix D.</p>

Objective Two – Improving Communications and Promoting Consultation and Involvement

Task: Analyse the impact of your policy with regard to Strategic Equality and Diversity Objective Two.

Questions to consider	Tick when addressed	Comments
How does your policy improve communications and promote consultation and involvement?	√	The Strategy's purpose is to set out and communicate the strategic vision for transport, including through consultation
Will information about the service/policy be available in alternative formats?	√	Details of how to respond to the consultation is included on the back cover of the document in eight community languages. A brailled version of the Executive Summary will be available along with contact details for further information. The final version will be available on the web
Will it be possible for disabled people to easily contact and communicate with the service?	√	One of the aims of the policy is to improve accessibility and remove barriers to transport in whatever form. A post consultation report to the DCF in December 2005 followed up issues raised during the consultation.
As part of your impact analysis have you considered who should be consulted and how to undertake consultation (see full guidance document)	√	Full and extensive consultation will be carried out, under the guidance of the Equalities and Diversity Unit. All residents were offered the opportunity to comment through HM Magazine.

Objective Three – Promoting Equality in Service Delivery

Task: Analyse the impact of your policy with regard to Strategic Equality and Diversity Objective Three

Questions to consider	Tick when addressed	Comments
Who has access to your service and takes up your service?	√	Everyone - All residents, businesses, people who work in the borough, and people who use transport links through the borough including roads, rail, bus, cycle etc
Do you think that there are any aspects of the policy/service that could contribute to inequality? e.g., location of facilities, access to translation	√	Location of transport facilities is a key issue and information about services could be a barrier. It is not possible to make access to transport uniform throughout the borough. Improvements to mitigate the impact of this will be

service, eligibility criteria, allocation policy etc.		implemented, subject to funding being made available
Does your policy/service need to cater for <ul style="list-style-type: none"> Religious needs? 	√	Religious institutions are identified as key points of interest for public transport and safer routes.
<ul style="list-style-type: none"> Language needs? 	√	Yes –clear and understandable information on services needs to be provided eg large font or community languages
<ul style="list-style-type: none"> Specific Dietary Needs? 	√	Not applicable
<u>Physical Access</u> e.g., can disabled people access the services?	√	Accessibility is being built in, in a number of ways including physical access and location
<u>Location/Geography</u> e.g., is the service located in an area accessible to the equality categories that it serves?	√	
<u>Sensitivity</u> e.g., is the policy sensitive to the needs and cultures of the equality groups e.g., religious needs?	√	Not applicable
<u>Restrictive Factors</u> e.g., are there any restrictive factors in relation to the policy that might lead to a negative impact for some or all equality categories or sub-groups e.g., national legislation that takes precedent over equality legislation such as Asylum and Immigration legislation, statutory charging structure etc?	√	<p>The plan is subject to the agreement of funding on an annual basis and will be used as the basis of the Borough Spending Plan. Unsuccessful bids will result in limited ability to implement the plans which could have a knock on effect on improving accessibility.</p> <p>Criteria for the Freedom Pass are set at a London Level. While this should reflect equalities legislation, it cannot be set to reflect Hounslow specific criteria</p>
If you are writing a policy, then who needs to understand your policy?	√	Members, Officers, special interest groups (the consultee list) Transport for London and the Mayor for London

Objective Four – Promoting Equality of Opportunity in Employment and Training

Task: Analyse the impact of your policy with regard to Strategic Equality and Diversity Objective Four

Questions to consider	Tick when addressed	Comments
Does the policy have any implications for recruitment and selection?	√	No
Establish when staff need to undertake training to promote equal opportunities and diversity to implement the policy/service changes.	√	Training for those who are developing and implementing the proposals

Objective Five- Evaluating the Success of your policy for promoting Equal Opportunities

Task: This stage should set out how you are going to deal with any adverse impact and/or any identified lack of positive contribution to the strategic equalities objectives and Equalities and Diversity commitments of the Equal Opportunities and Diversity policy of the Council.

In this stage you bring together:	Tick when addressed	Comments
The main conclusions of the assessment and the main conclusions from the consultation with stakeholders.	√	The consultation is now complete.
Set out the priority recommendations and actions.	√	The level of response from the general public identifies that there is still an issue of engagement in respect to transport. The majority of public issues raised were linked to areas out of the direct control of the Council No significant gaps were identified however the issue of funding availability will significantly lengthen delivery time.
What are you doing to address the gap/concerns identified?	√	The key issue promoting Equal Opportunities is to develop more interesting consultation methods to engage the wider community. Inadequate funding may cause delay to accessibility schemes.

Mitigation		Improved liaison with the Equality and Diversity Team to identify alternative engagement methods.
Advice:		
Having reviewed relevant data sources, determine whether or not there is an adverse impact for the equalities groups or on our equalities objectives and commitments.		

Consider the following questions:		
Does the Equality Impact Assessment reveal that:		
<ul style="list-style-type: none"> The policy unlawfully discriminates. 		No
<ul style="list-style-type: none"> There is an adverse impact upon one or more equality category or sub-groups within them. 		<p>Yes – The existing transport environment is lacking in terms of accessibility.</p> <p>The strategy implementation should go someway to address this.</p> <p>A core objective of the LIP is to identify potential adverse impacts due to poor or differential transport service provision and establish ways to address these</p>
<ul style="list-style-type: none"> The policy fails to promote the strategic equalities objectives. 		No - it is linked to the Equalities and Diversity Plan
<ul style="list-style-type: none"> Some equality categories or sub-groups are, or may be, excluded from the “benefits” of the policy. 		No the policy directly addresses this
<ul style="list-style-type: none"> There are barriers to certain communities enjoying the “benefits” of the policy. 		<p>Yes – The description of the existing transport environment demonstrates acknowledgment of current barriers to walking which impact on all those with mobility impairments.</p> <p>The strategy implementation should go someway to address this.</p> <p>A core objective of the LIP is to identify potential adverse impacts due to poor or differential transport service provision and establish ways to address these</p>
If there is an adverse impact in relation to any of the above, can this be justified?		Yes – uniformity is not possible and the aim of the strategy is to go some way to mitigate any adverse impacts of this

Equality impacts of programmes

Equality Target Group	Positive impact	Reason
Equal opportunities / or improved relations	High/ Low	
Gender		
Women	Low	Benefit most from safer travel at night, also as it is mainly women who take children to school, they may benefit from school travel plans. Also benefit from reduced accidents, congestion and improved bus services and improved air quality and more cycle lanes
Men	Low	Will benefit from reduced accidents, reduced congestion and improved bus services, improved air quality and more cycle lanes
Race		
Asian or Asian British people	Low	Will benefit from reduced accidents, reduced congestion and improved bus services, improved air quality and more cycle lanes. May also benefit from information being distributed in more languages
Black or Black British people	Low	Will benefit from reduced accidents, reduced congestion and improved bus services, improved air quality and more cycle lanes.
Chinese people and other people	Low	Will benefit from reduced accidents, reduced congestion, improved bus services, improved air quality and more cycle lanes. May also benefit from information being distributed in more languages
People of mixed Race	Low	Will benefit from reduced accidents, reduced congestion, improved bus services, improved air quality and more cycle lanes.
White people (including Irish people)	Low	Will benefit from reduced accidents, reduced congestion, improved bus services improved air quality and more cycle lanes.
Disabled people	High	Will benefit from bus accessibility programmes, increased disabled signage, local accessibility work, increased number of disabled parking spaces and increased safety in all locations as well as reduced accidents, reduced congestion and improved bus services and improved air quality as well as increased information provision in Braille.
Lesbian, gay men and bisexuals	Low	Will benefit from reduced accidents, reduced congestion and improved bus services and more cycle lanes and improved air quality
Transgender people	Low	Will benefit from reduced accidents, reduced congestion and improved bus services and more cycle lanes and improved air quality
Older people (60+)	Low	Will benefit from local accessibility work and increased safety in all locations as well as from reduced accidents, reduced congestion and improved

		bus services and improved air quality
Younger people (17-25) and children	Low	Will benefit from reduced accidents, reduced congestion and improved bus services, increased cycle training, motorcycle safety work, more cycle lanes and improved air quality
Faith groups	Low	Will benefit from reduced accidents, reduced congestion and improved bus services, increased cycle training, motorcycle safety work, more cycle lanes and improved air quality.

Conclusion

The EQIA concludes that the LIP has adhered to the Council's five strategic equality and diversity objectives defined by the Council's Equality of Opportunity and Diversity Policy. The main concerns are the engagement of hard to reach groups.

It recommends that Officers responsible for delivering the strategy:

- Continue to monitor consultees in relation to age, ethnicity and gender.
- Ensure that disability is included and effectively monitored.
- Attend equality and diversity training
- Where specific community sections continue to be unresponsive to consultations alternative consultation methods should be considered.