

Equality Impact Assessment / Equality Analysis

Title of service or policy	City Centre Security Project – Proposed Access Restrictions (interim EIA)
Name of directorate and service	Environmental Services – Highways, Transport and Parking
Name and role of officers completing the EIA	Simon Thomas – Senior Engineer, Design & Projects Group Louise Murphy – Corporate Equalities & Diversity Officer
Date of assessment	29 th June 2021 (and ongoing)

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version (including the action plan section) being published on the Council’s and NHS Bath and North East Somerset’s websites.

1.	Identify the aims of the policy or service and how it is implemented.	
	Key questions	Answers / Notes
1.1	<p>Briefly describe purpose of the service/policy e.g</p> <ul style="list-style-type: none"> ● How the service/ policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>Since 2017 Bath & North East Somerset Council have been working with the police and stakeholder organisations to improve security to key crowded streets and spaces within the city centre, particularly from hostile vehicle attack.</p> <p>Whilst there is no specific terrorism threat at present, counter terrorism police have advised that improved permanent protection and access restrictions should be a priority. Bath & North East Somerset Council therefore proposes to install purpose-designed controlled access points, replacing temporary measures and providing a higher quality of protection around the Bath Abbey, the Roman Baths and Pump Room, as well as the retail core of the city centre by early 2022.</p> <p>The council aims to ensure security measures combine protection of people, the economy and Bath’s outstanding heritage through robust but sensitive design and management.</p> <p>The project will be delivered through the Council’s Highways department with collaboration with its Emergency Management Team, although there will be frequent liaison with all internal service providers affected.</p>

1.2	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	<p>Whilst there is no legal or national requirement for the provision of access restrictions and associated protection measures in city centres, counter terrorism police representing forces across the UK, are now advising local authorities that improved protection should be introduced. In 2016 Avon and Somerset Police commissioned a survey report, which was carried out by the National Counter Terrorism Security Office (NaCTSO), which identified areas of crowded spaces in key parts of the city centre that are vulnerable to terrorist attack.</p>
1.3	<p>Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>The key objective of the project is the protection of key crowded spaces within the central core of the city centre.</p>

2. Consideration of available data, research and information

Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:

- **Demographic** data and other statistics, including census findings
- Recent **research** findings (local and national)
- Results from **consultation or engagement** you have undertaken
- Service user **monitoring data** (including ethnicity, gender, disability, religion/belief, sexual orientation and age)
- Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations
- Analysis of records of enquiries about your service, or **complaints** or **compliments** about them
- Recommendations of **external inspections** or audit reports

	Key questions	Data, research and information that you can refer to
2.1	What is the equalities profile of the team delivering the service/policy?	Because of the size of the team it is not appropriate to include specific details of protected characteristics.
2.2	What equalities training have staff received?	All staff receive equalities training as part of the induction programme and some top-up training. CCTV operatives have received bespoke equalities training. Future training should be designed to ensure staff are informed to provide advice on access queries, and also that any checking or vetting of people is carried out in a fair and consistent manner and that this does not vary across groups (due to stereotypes about certain minority ethnic minority groups). Checking should be consistent across all social groups. This will also need to be included within policy and protocols documentation.
2.3	What is the equalities profile of service users?	Residents, visitors, businesses, service providers across all equality groups and protected characteristics.
2.4	What other data do you have in terms of service users or staff? (e.g. results of customer satisfaction surveys, consultation findings). Are there any gaps?	Data collection for footfall has been examined. An assessment for potential blue badge holder displacement was undertaken. In addition, some research was completed on supported housing provision within the protected zone.
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	The proposals were shared with the Active Travel and Accessibility Forum and the Independent Equality Advisory Group. A public consultation ran from November 2020 to January 2021 522 responses in total 46% Agree 46% Disagree to principle of proposals 60% disagreed on streets proposed/timing of restrictions Respondents: 86% residents 19% businesses (some overlap) 18% of respondents considered themselves to have a disability

		<p>Responses to the consultation included the following issues:</p> <ul style="list-style-type: none"> • accessibility, particularly in relation to people with mobility impairments • the ability to receive deliveries within the proposed restricted zone • the impact on city centre businesses and residents and • the justification for the proposed security measures. <p>In addition, an Accessibility Study was undertaken by an independent access consultant. This study included meetings with a number of disabled people to find out in detail about the way that the proposals might impact upon them, and also to determine the effectiveness of possible mitigations. The findings of the Accessibility Study are summarised in 3.4.</p> <p>Consultation took place with B&NES internal teams to determine potential effect on Council wide services and operations. This has included the Council's Carer and Mental Health service providers. We have also consulted trusted partners/ key stakeholders and then the wider business and residential community that are likely to be affected. Comments have been captured, collated and compiled within a report to Cabinet in advance of advertising Traffic Regulation Orders.</p>
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	When a decision is made, the ATTRO/TRO will then be advertised and subject to additional consultation. Additional issues relating to equality that are raised will be monitored, and potential mitigations will be considered where possible.
<h3>3. Assessment of impact: 'Equality analysis'</h3>		
	<p>Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:</p> <ul style="list-style-type: none"> • Meets any particular needs of equalities groups or helps promote equality in some way. 	

	<ul style="list-style-type: none"> • Could have a negative or adverse impact for any of the equality's groups 		
		<p>Potential positive impacts of the proposals to increase city centre security</p>	<p>Potential negative impacts and what could be done to alleviate these?</p>
	All groups	<p>The provision of security measures is aimed at lessening the city centre's vulnerability to terrorist threats. The proposals aim to keep residents and visitors safe, to minimise potential casualties/ loss of life and also severe impacts on the economy of Bath and potentially the wider region.</p>	<p>Several options have been explored that aim to balance the need for increased security against ensuring access for disabled people and those who live within the proposed zone.</p>
3.1	<p>Sex – identify the impact/potential impact of the policy on women and men.</p>	<p>No particular positive impacts have been identified on the grounds of sex and gender.</p>	<p>No issues relating to the single characteristic of sex/gender were raised within the consultation process. Within the consultation there were issues raised about safety issues for disabled women.</p> <p>The issue of the safety of women and girls have been brought sharply into focus recently. There are potential implications in relation to perceived safety for women (both disabled and non-disabled) who are likely to feel more vulnerable if they are not able to park/get a taxi/be dropped off close to their destination.</p> <p>Therefore, there are issues to address in relation to</p>

			safety and perceived safety in the implementation phases, whichever option is chosen. Consideration should be given to more public space CCTV, and street lighting.
3.2	Pregnancy and maternity	<p>As the proposals would result in streets with less vehicles, there are likely to be positive impacts for parents/carers with young children who may be less at risk from passing cars.</p> <p>Streets with less traffic may also be much easier to negotiate to anyone pushing a pram/buggy.</p> <p>The removal of vehicles from the area will have a beneficial impact on air quality. Children who are subject to poor air quality can have whole life impacts and reduction in lung capacity of up to 15%.</p>	<p>There are potential implications in relation to parents/carers with small children if they are no longer able to park/get a taxi/be dropped off as close to their destination within the proposed zone.</p> <p>This could be considered during the implementation stages, whichever option is chosen. Consideration should be given to more public space CCTV, and street lighting.</p>
3.3	Transgender – – identify the impact/potential impact of the policy on transgender people	No positive impacts were identified in relation to transgender people.	No issues were raised within the consultation. Some groups are more vulnerable to hate crime. There are therefore potential implications in relation to safety and perceived safety, if people are not able to park/get a taxi/be dropped off close to their destination.

			There are clearly implications to address in relation to safety and perceived safety in the implementation phases, whichever option is chosen. Consideration should be given to more public space CCTV, and street lighting.
3.4	Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	<p>For some disabled people, restricting traffic to the proposed areas would have a positive impact and make them feel more safe and secure.</p> <p>Streets with less traffic may be easier to negotiate for some disabled people (e.g. those with mobility impairment, wheelchair users, people with learning disabilities).</p> <p>The removal of vehicles from the area will have a beneficial impact on those who have asthma, COPD and similar conditions</p>	<p>Within the consultation, there were a lot of issues raised in relation to disability. In particular:</p> <ul style="list-style-type: none"> • The need for access “at-all-times” for vulnerable groups (particularly Blue Badge Holders). • Access for residents <p>A full Accessibility Study was undertaken to understand the potential impacts and assess potential mitigations. The Access Study made the following recommendations:</p> <ul style="list-style-type: none"> • Allow Blue Badge holders to access the zone at all times – (this recommendation is now being considered, and Cabinet will base their decision on the need to balance access requirements alongside security risks). • Switch administrative burden for access requests to B&NES (incl. deliveries). This would involve the Council working with customers and residents to ensure that access is as easy as possible whilst ensuring that the security objective remains in place. <p>The Accessibility Study also explores a number of possible mitigations:-</p>

			<ul style="list-style-type: none"> • Electric shuttle bus if options to allow Blue Badge Holders access was not possible (In the study, disabled people expressed concerns that a shuttle may be difficult to access for many, and also had concerns about frequency, route, hours of operation etc). • Increase number of on-street disabled parking in adjacent streets (In the study, concerns were expressed about the unmanageable distances this would still involve for those with mobility impairment and also the knock-on negative impacts for residents parking). • Increase number of free off-street disabled parking in Council car parks (this is being explored) • Various other improvements (which are outside of the scope of the work for the City Centre Security Proposals, but might lessen negative impacts for some disabled people - such as improvements to footway surfaces, tactile surfaces, lighting, seating etc, improvements to public toilets). • Concerns around personal safety at night are to be addressed through simple changes to the design of streets such as increased street-lighting and the installation of additional CCTV. Funding for these safety measures will be considered through mechanisms such as the Safer Street Fund, CIL monies or even potential provision through developer contributions.
3.5	Age – identify the impact/potential	For some older people,	Many of the issues outlined in 3.4 also apply to older

	<p>impact of the policy on different age groups</p>	<p>restricting traffic to the proposed areas could have a positive impact and make them feel more safe and secure.</p> <p>This may also be the case for younger age groups, where there may be positive impacts and increased safety with less traffic.</p> <p>The removal of vehicles from the area will have a beneficial impact on air quality. Children who are subject to poor air quality can have whole life impacts and reduction in lung capacity of up to 15%.</p>	<p>people. Within the consultation, there were a lot of issues raised in relation to vulnerable groups, which include older people. In particular:</p> <ul style="list-style-type: none"> • The need for access “at-all-times” for vulnerable groups (particularly Blue Badge Holders). • Access for residents <p>There may be particular issues for older people who use taxis if these were no longer able to access the zone to drop off.</p> <p>It was noted that particular service run by Age UK are located within the proposed zone (St Michaels Day Centre) and service users are dropped off by minibus near to the centre. Many service users have difficulties walking any distance. This will need to be addressed in the implementation phases, whichever option is chosen.</p>
<p>3.6</p>	<p>Race – identify the impact/potential impact on different black and minority ethnic groups</p>	<p>No positive impacts identified</p>	<p>No issues were raised within the consultation. Some groups are more vulnerable to hate crime. There are therefore potential implications in relation to safety and perceived safety, if people are not able to park/get a taxi/be dropped off close to their destination.</p> <p>There are clearly implications to address in relation to safety and perceived safety in the implementation phases, whichever option is chosen. Consideration should be given to more public space CCTV, and</p>

			street lighting.
3.6	Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	No positive impacts identified	No issues were raised within the consultation. Some groups are more vulnerable to hate crime. There are therefore potential implications in relation to safety and perceived safety, if people are not able to park/get a taxi/be dropped off close to their destination. There are clearly implications to address in relation to safety and perceived safety in the implementation phases, whichever option is chosen. Consideration should be given to more public space CCTV, and street lighting.
3.7	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	No positive impacts identified.	Further decisions to be made surrounding vehicular access requirements for weddings at the Abbey.
3.8	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	No positive impacts identified	Further decisions to be made surrounding vehicular access requirements for funerals at the Abbey.
3.9	Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).	No positive impacts identified.	There are cost implications for some people if there is less available on-street parking (for Blue Badge Holders and non-Blue Badge Holders). On-street parking provision is being considered alongside this proposal.
3.10	Rural communities* – identify the impact / potential impact on people living in rural communities	No positive impacts identified	No issues identified

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
<p>NB – As a decision has not been made about which particular option will be progressed, it is not possible to develop a clear action plan at present. Potential issues that will need to be worked on when a decision is made have been listed below. Further details will be added as the pathway becomes clear.</p>				
Training for CCTV staff				
Safety issues - Explore CCTV coverage and lighting				
Access for Age UK service users to St Michael's Day Centre				
Explore and increase parking provision for Blue Badge Holders adjacent to the zone				
Explore further improvements to the				

public realm (such as improvements to footway surfaces, tactile surfaces, lighting, seating etc)				
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5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by: Chris Major (Divisional Director or nominated senior officer)
Date: 30/06/21

Louise's notes after meeting Lynda and Simon 4/2/20

Bollard spacing – will be 1.2 metres – louise will check what is recommended for mobility scooters. The current spacing in Union St is 1.2 metres and has received no complaints. Simon has been informed by London Cycle Guides that widest width of bikes is 1.2 metres.

