

Full Equality Impact Assessment Guidance

This guidance should be used following the completion of an initial screening EIA form for which there is separate guidance.

1. What is a [Full Equality Impact Assessment](#)?

A Full Equality Impact Assessment is a systematic process of evidence gathering and analysis aimed at ensuring that public authorities are meeting their equality duty to better promote equality.

The Equality Act 2010 defines protected characteristics as Age, Disability, Gender reassignment, Marriage and civil partnership, Race, Religion or belief, Pregnancy and Maternity, Sex, Sexual orientation.

Additionally, in considering the impact on protected characteristic groups, we must consider the impact (positive or negative) of the “policy” on the Statutory Requirements of the Welsh Language Measure (2011) and the Welsh Language Standards imposed on the council as described within the full EIA template.

Full Equality Impact Assessments follow the same format and process as a Screening Impact Assessment but **require greater resources in terms of time and commitment to gather and analyse a wider range of evidence** than would normally be required for a Screening Impact Assessment. This extra commitment should be taken into account during the early planning stages of relevant policies.

Assessing the impact of proposed changes to policies and strategies is not just something the law requires, it is a positive opportunity to ensure decisions are based on robust evidence and that:

- decisions include a consideration of actions that would help to avoid or mitigate any unfair impact on individuals or groups who share protected characteristics;
- decisions are based on evidence;
- the decision-making process is transparent;
- there is a record of the equality considerations which have been taken into account.

For additional guidance on financial decision making see the following code of practice
<http://www.equalityhumanrights.com/guidance-and-codes-of-practice/using-the-equality-duties-to-make-fair-financial-decisions/>

2. When do you undertake a Full Equality Impact Assessment?

Equality Impact Assessments are an integral part of the policy and strategy drafting process and must be done in the early stages of the policy and strategy planning. The assessment should inform the policy or strategy and must be considered carefully **before** a decision is made.

A Full Equality Impact Assessment **must be undertaken** if:

- a Screening Equality Impact Assessment has recommended that a Full Equality Impact Assessment be undertaken and /or;
- the policy or strategy is a major one in terms of scale or significance to BCBC's activities and there is a clear indication that it is likely to have an impact upon people who share a protected characteristic;
- although the policy or strategy is minor, it is likely to have a major impact upon people who share a protected characteristic.

3. Who is responsible for undertaking a Full Equality Impact Assessment?

The lead person who drafts or reviews a policy or strategy within the commissioning service area is responsible for conducting the assessment. Assessments are always more productive if undertaken by a small team of, for example, 3 people. Involvement of, or consultation with, BCBC's Equality Officer and Consultation and Engagement Officer is critical to ensure compliance.

Team members need enough knowledge of the service to make valid judgements and have an awareness of the needs and issues faced by people with protected characteristics. It is essential that the author or the reviewer of a policy and at least one other member of the team involved has undertaken EIA Training. The team's role is to discuss and share potential equality issues relating to the planned policy, gather and analyse evidence and inform the EIA.

4. **Gathering Evidence**

Expert groups: Early informal consultation with people who share protected characteristics can alert you to the possible effects of a planned policy or strategy which you can take into consideration when developing a policy or practice.

Desktop research: Identify, collect and analyse relevant quantitative and qualitative data, published research or information gathered by the Council, government and other bodies such as voluntary, community and trade union organisations to help your analysis. This evidence must be referred to or referenced within the EIA.

Local research: Some service areas routinely collect community views on planned new services or changes to strategies or projects. However it is important to recognise that some individuals and communities face a range of social, economic, cultural, communication, physical and / or sensory barriers to participation. To overcome these barriers a more proactive and often creative approach is sometimes needed to encourage and support their participation. It is important to review existing methods of gathering information, including customer satisfaction surveys, parents, tenants, resident meetings etc and identify how issues affecting people who share protected characteristics can be gathered, analysed and fed back to inform the EIA. This may require some changes to traditional consultation practice, venues need to be accessible and additional support may be required if you are to engage and record the views of protected characteristic individuals and communities.

Lack of Information: Any gaps and inadequacies in data should be documented within the EIA and must include a statement setting out how and when you will gather that information. Consider the possibility of collaborative research with other departments and partners. It is important that lack of data does not lead to a lack of action in tackling inequality.

5. **Using evidence to inform EIA**

It is crucial to use the evidence you collect to inform your assessment. This will help demonstrate that you have met the general duty and have shown due regard to eliminating discrimination, advancing equality and fostering good relations. A large part of your analysis will involve identifying differences between groups in relation to their needs, experience and barriers they face.

You should also analyse evidence to identify potential multiple disadvantages. For example, an Asian woman could have difficulties accessing services because of factors related to both gender and her race. You may also want to compare your evidence with other similar organisations, national sources of evidence, evidence from within the Council. For example:

- the percentage of ethnic minority people using services
- the number of women employed at a senior level.
- customer satisfaction levels for different equality groups.
- The data in Analysis of Economic inequality in Wales

6. Publication of a Full EIA

Full equality Impact assessments must be published.

Full Equality Impact Assessment

Name of project, policy, function, service or proposal being assessed:	Bridgend Town Centre Access Study
Date assessment completed	08.11.2016

At this stage you will need to re-visit your initial screening template to inform your discussions on consultation and refer to [guidance notes on completing a full EIA](#)

The aim of the Bridgend Town Centre access study (April 2016) was to review methods and assess risks of increasing vehicular access to parts of Bridgend Town Centre.

The town centre has been pedestrianised since 2004 prohibiting vehicle access between 10am-6pm and restrictions that apply outside of these hours are to vehicles loading only. Making changes to access arrangements in these streets will require an understanding of the equalities implications, risks, costs and physical constraints and for this reason the study was commissioned.

The study has been undertaken in consideration of the following key factors:

- Collision data analysis comparing pre and post pedestrianisation information. There were 13 Pre-Pedestrianisation Collisions between January 2000 and November 2003 which resulted in 14 casualties. All collisions resulted in slight injuries.
- Post Pedestrianisation Collisions November 2004 to December 2014 which resulted in 3 pedestrian casualties. All collisions resulted in slight injuries.
- Risk assessments for reintroducing traffic to Queen St, Dunraven Place and Market St, including an assessment of the likely maintenance issues and safety issues, together with implications for each option, utilising pre / post pedestrianisation data have been undertaken.
- The safety assessment gives particular consideration to the needs of vulnerable road users;
- Changes required to existing parking/loading bays;

- Pedestrian crossing locations and type;
- Signing / lining requirements;
- Suitability of existing construction and budget cost estimates of physical changes required to achieve an acceptable level of public safety;
- Town centre traders' request that the times of the pedestrianisation be revisited to mitigate footfall and trade reduction.

The equalities and safety implications of increasing vehicular access to the town centre have been a key component of the study and the primary reason for commissioning the report. The report concludes that “it is unlikely that any of the access options will totally satisfy the needs of all disabled groups”. Visually impaired people usually prefer vertical segregation in streets with cars, but people with mobility issues would usually favour a flush surface.

The Council's own records also show that since 2004 many complaints have been received from elderly and/or people with mobility issues about the lack of access to the town centre. The proposal will offer a benefit to some disabled people by allowing them to park closer to amenities.”

Within the study some protected characteristic groups will be impacted positively by the access proposals and others negatively. However this impact is expected to be positive for the wider community.

An external consultation on the proposals outlined by the access study was undertaken over a 12 week period between 8th August 2016 and 24th October 2016. The consultation engaged with 2,480 residents from a combination of the consultation survey and engagement events held at Tesco Extra in Bridgend, Bridgend Indoor Market and the McArthur Glen outlet at Bridgend. This Full Equality Impact Assessment outlines the analyses associated with the consultation. The results gathered from the consultation have been used to consider whether the proposals within the access study are supported by the public at large and in particular protected groups.

Key Findings

A total of 2,480 responses to the consultation were received in total. Of the responses received, there were 1,221 online submissions and 803 paper versions of the survey returned. There were 193 social media interactions and 262 interactions received from the community engagement events.

Nine in ten respondents (89%) identified they were currently living within the county borough with the remaining 11 per cent residing elsewhere. Two in five (38%) identified themselves as parents. Three in five (59%) of the respondents to the survey identified themselves as working or in training, one in three (33%) were retired and two per cent of respondents classified themselves as looking for work.

Approaching eight in ten (77.0%) of respondents agreed with the proposal against one in five (20.1%) respondents who disagreed. Tourists were even more supportive with 86 per cent selecting agree or strongly agree.

Of those who supported the proposal, three in four (74.1%) would like the roads to be open 24 hours a day, seven days a week.

Full vehicle access was supported by the following demographic factors:-

- residents (58.9%)
- tourists (73.5%)
- parents of young children (55.4%)
- respondents without young children (63.9%)
- disabled (61.7%)
- non-disabled (60.5%)

One hour parking was the most popular response overall with over two in five (42.1%) selecting the option followed closely by 40 per cent selecting 30 minute parking bays.

Over seven in ten (75.8%) thought the introduction of the proposal would have a positive impact on the town centre.

1. Consultation

		Action Points
Who do you need to consult with (which equality groups)?	Age Disability Pregnancy and maternity	

<p>How will you ensure your consultation is inclusive?</p>	<p>The council is mindful of the different accessibility needs of people and consultation was carried out inclusively using as wide a range of formats and access opportunities as possible.</p>	<p>The consultation methods comprised of hard copy materials in accessible font sizes, online methods for customers and citizens who wished to feedback in a digital environment, face to face focus groups enabling people to feedback verbally to council representatives and the Bridgend Equality Forum who also engaged with their individual groups. 40 town centre shops received consultation packs with over 3000 paper copies being distributed, and the shop owners engaged with and actively encouraged their customers to give their views.</p>
<p>What consultation was carried out? Consider any consultation activity already carried out, which may not have been specifically about equality but may have information you can use</p>	<p>The council's consultation period on the Bridgend Town Centre Access study began on 8th August 2016 and ended on 24th October 2016. The consultation consisted of an on-line survey, face to face consultation over nine days at three different locations, hard copy surveys distributed to town centre traders and to the town traders forum. Consultation took place with the Bridgend Equality Forum which meets on a bimonthly cycle and various meetings held with representative groups such as Bridgend Visually Impaired Society,</p>	<p>Please see Consultation Report.</p>

	<p>Bridgend Deaf Club and Bridgend Coalition of Disabled People to discuss the access study. A facebook debate with the Director of Communities took place regarding the access study on September 1 2016.</p> <p>Previous to the formal public consultation discussions regarding the access proposal had taken place with representatives of the Bridgend Coalition of Disabled People, Bridgend traders forum, Bridgend Business Improvement District and the Indoor market.</p>	
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Record of consultation with people from equality groups

Group or persons consulted	Date, venue and number of people	Feedback, areas of concern raised	Action Points
Youth Cabinet	31 st August 4 people	None at the time.	
Bridgend College Freshers' Fair	6 th September 26 people		
BEF	14 th September 9 people	Concern around the necessity of tactile paving and safe crossing points. Generally perceived as positive for increasing accessibility since the removal of	

	23rd May (pre-consultation) 11 people	shop mobility from the Rhiw car park. BEF members highlighted they looked forward to sharing their views online too.	

2. Assessment of Impact

Based on the data you have analysed, and the results of consultation or research, consider what the potential impact will be upon people with protected characteristics (negative or positive). If you do identify any adverse impact you **must**:

a) Liaise with the Engagement Team who may seek legal advice as to whether, based on the evidence provided, an adverse impact is or is potentially discriminatory, and

b) Identify steps to mitigate any adverse impact – these actions will need to be included in your action plan.

Include any examples of how the policy helps to promote equality.

Gender	Impact or potential impact	Actions to mitigate
Identify the impact/potential impact on women and men.	None	

Disability	Impact or potential impact	Actions to mitigate
<p>Identify the impact/potential impact on disabled people (ensure consideration of a range of impairments, e.g. physical, sensory impairments, learning disabilities, long-term illness).</p>	<p>This Full Equality Impact Assessment reinforces the detail in the Initial Screening Equality Impact Assessment which is that all people stating they had a disability could potentially be impacted by one or more of the proposals in the access study.</p> <p>Reintroducing traffic with associated parking spaces in the town centre will generally have a positive impact on people with a disability. The ability to drop off or park close to the town centre shops and restaurants will benefit this group by reducing the distance currently needed to get to the shops from the public car parks. It will also make the shopping experience much easier by enabling access for disabled people who cannot currently use the town centre. One hour parking bays will give a reasonable amount of time for people with disabilities to shop in the town. Dedicated disabled parking bays will ensure that provision is always available for blue badge holders.</p> <p>Reintroducing traffic all day to a previously pedestrianised street could impact the safety of some disability groups in particular, visually impaired, blind, D/deaf, those with a learning disability and stroke survivors having mobility issues and/or cognitive impairments.</p>	<p>None</p> <p>To mitigate the safety risks to town centre users, in particular those with protected characteristics, the design and layout of the road system will be consulted on to</p>

		<p>ensure all relevant and appropriate road safety measures are put in place. These will include</p> <ul style="list-style-type: none"> -bollards -tactile paving - crossing points - signage - resting points - traffic control methods such as speed bumps - 20mph speed limit <p>BCBC will also arrange site visits for disability groups to ensure the changes made to the road layout are fully understood.</p> <p>A robust marketing campaign advising of the changes to the road layout will be developed with particular focus on those protected characteristic groups likely to be impacted.</p>
Race	Impact or potential impact	Actions to mitigate
Identify the impact/potential impact of the service on Black and minority ethnic (BME) people.	Changes to the road signage as part of the proposal may impact on this group.	A robust marketing campaign advising of the changes to the road layout will be developed with particular focus on those protected characteristic groups likely to be impacted.

Religion and belief	Impact or potential impact	Actions to mitigate
Identify the impact/potential impact of the service on people of different religious and faith groups.	None	
Sexual Orientation	Impact or potential impact	Actions to mitigate
Identify the impact/potential impact of the service on gay, lesbian and bisexual people.	None	
Age	Impact or potential impact	Actions to mitigate
Identify the impact/potential impact of the service on older people and younger people.	<p>This Full Equality Impact Assessment reinforces the detail in the Initial Screening Equality Impact Assessment which is that people from all ages in Bridgend could potentially be impacted by one or more of the proposals outlined in the access study.</p> <p>In particular young children / toddlers could</p>	A robust marketing campaign, including

	<p>be negatively impacted by the proposals. Reintroducing traffic all day to a previously pedestrianised street could impact on the safety of children if the parent/guardian is unaware of the changes. Young children/toddlers walking unsupervised from the pedestrianised streets in the town centre to the new road layout could be at risk from a traffic accident.</p> <p>Reintroducing traffic with associated parking spaces in the town centre will have a positive impact on elderly people. The ability to drop off or park close to the town centre shops and restaurants will benefit this group by reducing the distance currently needed to get to the shops from the public car parks. It will also make the shopping experience much easier by enabling access for people of all ages who cannot currently use the town centre. One hour parking bays will give a reasonable amount of time for elderly people to shop in the town.</p>	<p>radio and newspaper advertising, advising of the changes to the road layout will be developed with a particular focus on children and young people. Nursery, primary, secondary and special schools will be advised of the changes and BCBC will consider employing traffic marshals during the initial phase of opening the road to traffic to inform and advise the public.</p> <p>At the design phase, when appointed engineers will consider the final detail of the road layout, children and young people (and the groups that represent them) will be consulted with a view to better understanding their specific requirements in terms of access and safety.</p>
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	<p>Reintroducing traffic all day to a previously pedestrianised street could impact on the safety of some elderly people and those with dementia. Changes to the layout may be confusing and bring these people into conflict with vehicles.</p> <p>Some elderly people may find the crossing points of the new street too far to walk and consideration must be given to the provision of seating along the route.</p>	
Pregnancy & Maternity	Impact or potential impact	Actions to mitigate
	<p>Reintroducing traffic all day to a previously pedestrianised street could impact on the safety of children if the parent/guardian is unaware of the changes. Young children/toddlers walking unsupervised from the pedestrianised streets in the town centre to the new road layout could be at risk from a traffic accident.</p>	<p>A robust marketing campaign, including radio and newspaper advertising, advising of the changes to the road layout will be developed with a particular focus on children and young people. Nursery, primary, secondary and special schools will be advised of the changes and BCBC will consider employing traffic marshals during the initial phase of opening the road to traffic to inform and advise the public.</p> <p>At the design phase, when appointed engineers will consider the final detail of</p>

		the road layout, children and young people (and the groups that represent them) will be consulted with a view to better understanding their specific requirements in terms of access and safety.
Transgender	Impact or potential impact None	Actions to mitigate
Marriage and Civil Partnership	Impact or potential impact None	Actions to mitigate

Under the Welsh Language Standards, EIAs must also consider:

- whether the policy would impact on people’s opportunity to a) use the Welsh language in a positive or negative way and b) treat both languages equally;
- how the policy could be changed to have a positive effect or increase the positive effect on a) people’s opportunity to use the Welsh language and b) treating both languages equally;
- how the policy could be changed to minimise or remove any adverse effects on a) people’s opportunity to use the Welsh language and b) treating both languages equally.

Welsh Language	Impact or potential impact	Actions to mitigate
Identify the impact/potential impact on Bridgend County Borough Council, the Welsh Language, Welsh Culture, Welsh Language (Wales) Measure 2011 and the Welsh Language Standards.	New traffic signage will be installed as part of the proposed scheme.	All new signage will comply with the Welsh Language Standards issued to BCBC by the Welsh Language Commissioner.

The following Section only applies where there is a potential impact (negative, positive or neutral) on children

United Nations Convention on the Rights of the Child (UNCRC)

The UNCRC is an agreement between countries which sets out the basic rights all children should have. The United Kingdom signed the agreement in 1991. The UNCRC includes 42 rights given to all children and young people under the age of 18. The 4 principles are:

1. Non-discrimination
2. Survival and development
3. Best interests
4. Participation

This section of the Full EIA contains a summary of all 42 articles and some will be more relevant than others, depending on the policy being considered however, there is no expectation that the entire convention and its relevance to the policy under review is fully understood. The Engagement Team will review the relevant data included as part of its monitoring process. The EIA process already addresses two of the principle articles which are non-discrimination and participation. This section covers “Best interests” and “Survival and development”.

Some policies will have **no direct impact** on children such as a day centre for older people.

Some policies will **have a direct impact** on children where the policy refers to a childrens' service such as a new playground or a school.

Some policies will **have an indirect impact** on children such as the closure of a library or a cultural venue, major road / infrastructure projects, a new building for community use or change of use and most planning decisions outside individual home applications.

What do we mean by “best interests”?

The “Best interest” principle does not mean that any negative decision would automatically be overridden but it does require BCBC to examine how a decision has been justified and how the Council would mitigate against the impact (in the same way as any other protected group such as disabled people).

- The living wage initiative could be considered to be in the “Best interests”. The initiative could potentially lift families out of poverty. Poverty can seriously limit the life chances of children.
- The closure of a library or cultural building would not be in the “Best interests” of children as it could limit their access to play, culture and heritage (Article 31.)

Please detail below the assessment / judgement of the impact of this policy on children aged 0 – 18. Where there is an impact on “Best interests” and “Survival and development”, please outline mitigation and any further steps to be considered.

Impact or potential impact on children aged 0 - 18	Actions to mitigate
<p>Bridgend County Borough Council has adopted the principles within the United Nations Convention on the Rights of the Child. One of the themes with the UNCRC is that of “Best Interests”. The depedestrianisation proposal is considered to be in the best interests of children and young people as access to the town centre, shops and businesses will also allow children and young people access to services such as banks and the post office and to social activities.</p> <p>However, young children / toddlers could be negatively impacted by the proposal as reintroducing traffic all day to a previously pedestrianised street could impact on the safety of children if the parent/guardian is unaware of the changes. Young children and toddlers walking unsupervised from the pedestrianised streets in the town centre to the new road layout could be at risk from a traffic collision.</p>	<p>A robust marketing campaign, including radio and newspaper advertising, advising of the changes to the road layout will be developed with a particular focus on children and young people. Nursery, primary, secondary and special schools will be advised of the changes and BCBC will consider employing traffic marshals during the initial phase of opening the road to traffic to inform and advise the public.</p> <p>At the design phase, when appointed engineers will consider the final detail of the road layout, children and young people (and the groups that represent them) will be consulted with a view to better understanding their specific requirements in terms of access and safety.</p>

It is essential that you now complete the action plan. Once your action plan is complete, please ensure that the actions are mainstreamed into the relevant Service Development Plan.

3. Action Plan

Action	Lead Person	Target for completion	Resources needed	Service Development plan for this

				action
Commission consultants to produce detailed designs	Tony Godsall	December 2016	Staff time	
Appointed consultants to consult with protected groups regarding designs to inform final scheme	Consultants / Equalities Officer / Town Centre Manager	End of Financial year 16/17	To be built into contract	
Statutory consultation	Highways Manager	End of financial year 16/17	Staff time Consultation costs	
Develop a marketing campaign to inform changes to the access arrangements in town centre.	BCBC Comms Manager / Town Centre Manager	When changes to the access of the town centre have commenced		
Information sessions to be provided to protected groups	Town Centre Manager / Equalities Officer	When changes to the access of the town centre have commenced		
Guided walks / site visits to take place once scheme has been	Town Centre Manager / Equalities Officer / Road Safety manager	On completion of the scheme		

completed.				

Please outline the name of the independent person (someone other the person undertaking the EIA) countersigning this EIA below:

Paul Williams – Equalities Officer

Please outline how and when this EIA will be monitored in future and when a review will take place:

A further EIA will be written and monitored bi annually once vehicle access to the town centre (through Queen St, Dunraven Place and Market St) has been introduced.

Signed:

Date:

