



London Borough of Hounslow

EQUALITIES ANALYSIS FORM

Equality Analysis should be undertaken before a decision is made when adopting or reviewing policies/procedures or for savings proposals/ restructures and transformations where it is likely to affect equalities groups or engage the Public sector Equality Duty under section 149 of the Equality Act 2010 –See Appendix below).

(Note: If Equality is considered to have little or no effect on equality groups or if it is unlikely to engage equality duty then you do not need to complete this form. Even where the proposal is relevant to the equality duty but the effects is remote or peripheral to the substance of the Equality duty then do not complete this form, just use the standard equalities text in your main report , see web page for standard text .)

Your Equality Analysis needs to demonstrate that due regard has been given to the equalities protected characteristics and the equalities duties and that this policy/ procedure/ proposal is not in breach of the equality duties. The aim is to support members make informed decisions about the policy/savings proposal balanced against any likely adverse effects. You must advice members about what actions are proposed to mitigate any adverse effect identified by affected stakeholders during your consultation or from your data analysis.

Due regard has to be given to:

- **ensure that your decisions impact in a fair way:** where there is evidence that particular equalities groups will be negatively affected by a decision, action should be taken to address this.
- **make your decisions based on evidence and more transparent :** Equality Analysis provides a clear and structured way to collect, assess and put forward relevant evidence and is much more open and transparent.
- **provide a platform for partnership working:** Equality Analysis offers an opportunity for organisations to work in partnership to consider the effect on members of their shared communities and how they might best collaborate and co-ordinate financial decisions.
- **enable decision makers to assess** whether the decision might amount to unlawful discrimination and/or might effect on the promotion of equality of opportunity and/or might effect on the promotion of good relations, and if so the extent and nature of those effects.

Directorate/ Section Name of the proposal/policy to be assessed:	Environment, Culture and Customer Services / Traffic & Transport Swyncombe Avenue No Entry	Date of Analysis Ongoing	Person Responsible for the analysis (include name of author if different)	Ian Perry
<p>1. Briefly describe the policy/ proposal –its aim and expected outcomes.</p>		<p>The Swyncombe Avenue proposed No Entry from Boston Manor Road will reduce the amount of through traffic travelling west to east between Boston Manor Road and Windmill Road. Approximately 10,000 vehicles use Swyncombe Avenue on an average weekday. This is consistent with its use as a through route and is high for an unclassified residential road. The proposal aims to increase the numbers of trips made by foot, bike and public transport, by improving safety and air quality and reducing traffic volumes but maintaining resident access to properties.</p> <p>It is being proposed to implement this measure as a trial as part of the borough's Active Travel programme. An experimental traffic order will be used, and the trial will be in place for a minimum of 6 months with the council required to consult throughout the trial.</p>		

<p>2. Who is the policy/ proposal going to effect and in what way? Please use evidence to support your analysis. Use separate sheets if necessary.</p>	<p>All those that live, work or travel through Swyncombe Avenue, all of whom will have the equality characteristic, but the impact is not likely to be on grounds of equality. See attached sheet.</p>	
<p>3. When will the decision be taken?</p>	<p>30 July 2021</p>	
<p>4. Are there concerns that the decision could affect the following:- Please explain or attach evidence of your answers to these questions</p>		
<p>(i) Age</p>	<p>Y</p>	
<p>(ii) Disability</p>	<p>Y</p>	
<p>(iii) Gender Reassignment</p>		<p>N</p>
<p>(iv) Marriage and Civil Partnership</p>		<p>N</p>
<p>(v) Race</p>		<p>N</p>
<p>(vi) Religion or Belief</p>		<p>N</p>
<p>(vii) Sex</p>		<p>N</p>
<p>(viii) Pregnancy and Maternity</p>		<p>N</p>
<p>(ix) Sexual Orientation</p>		<p>N</p>
<p>(x) fostering good relations and community cohesion</p>		<p>N</p>
<p>(xi) Human rights Public Authorities have a duty under the Human Rights Act 1998 (HRA) not to act incompatibly with rights under the European Convention for the Protection of Fundamental Rights and Freedoms Because of the close relationship between human rights and equality, it is good practice for those exercising public functions to consider equality and human rights together when analysing for effect on policies and proposals. (See list below for the Human Rights Articles)</p>		<p>N</p> <p>The Council has carefully considered the impact of this proposal on each of the equalities characteristics. An initial assessment identified some impact on grounds of equality. There is likely to be some impact for some residents and motorists who traditionally used Swyncombe Avenue to access other streets. There is little evidence to suggest that equality has any bearing on this particular impact, however the council recognises that those with a disability, who may be more reliant on car journeys, may have to change some of their journeys. For example, the restriction being introduced will not permit access for any vehicle. While quieter streets have wider benefits to the community with regards to air quality, improved safety and increased active travel, they also have the opportunity to provide shorter journey times for those more reliant on private car journeys.</p> <p>Transport for London's document, Travel in London: Understanding our diverse communities (2015) outlines the barriers faced by London's communities with regards to access to transport. This document contains a range of statistics for those with a disability, with regards to transport in the capital;</p> <ul style="list-style-type: none"> - Fourteen per cent of Londoners consider themselves to have a disability that impacts their day to day activities 'a lot' or 'a little'. - The most commonly used types of transport by disabled Londoners are walking (78 per cent walk at least once a

		<p>week), the bus (56 per cent) and car as a passenger (47 per cent)</p> <ul style="list-style-type: none"> - Disabled Londoners cite accessibility-related issues (44 per cent), cost (21 per cent) and comfort (20 per cent) as key barriers to travel. - Eighty-five per cent of disabled Londoners say they never use a bike to get around London, a slightly smaller proportion than among non-disabled Londoners (82 per cent). <p>If approved an experimental order will be utilised to progress this scheme, consultation will run alongside the trial. The measures will be installed 12 August 2021, with consultation to run through until between 12 February 2021. Feedback from residents and business will be vital during this time to help understand the impact of the proposals and whether they will remain in place.</p> <p>The restriction will apply to all motor vehicles accessing Swyncombe Avenue from the west, from Boston Manor Road, such as visitors, delivery drivers etc. This may cause an issue for elderly and disabled residents having visitors, private hire vehicles, food and medicine drop offs, school drop offs and childcare. Drivers would have to use alternative routes which may cause delay.</p> <p>This has been assessed to have a minor impact at this stage. However if an elderly or disabled resident is in need of a visitor in the case of an emergency the impact may be seen as more moderate to significant.</p>
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<p>5. Which equalities duties will be engaged by this proposal and will require due regard to be given before a decision is made? (See summary of equalities duties below)</p>	<p>The Council has to give due regard to its Equalities Duties, in particular with respect to general duties arising pursuant to the Equality Act 2010, section 149. Having due regard to the need to advance equality involves, in particular, the need to remove or minimise disadvantages suffered by persons who share a relevant characteristic that are connected to that characteristic.</p>
<p>6. Are there any relevant groups or stakeholders who you can approach to explore their views on the policy/proposal? You must consult/involve those who will be affected by the decision. YES/NO</p> <p>Please list the relevant groups and how the views of these groups will be obtained. Or state the reason why you have not approached groups/users affected by your proposal</p>	<p>The proposal is not expected to affect any group because of a equality characteristic. The affected parties in this case are local residents, local businesses, schools, resident associations and the emergency services.</p> <p>A previous proposal was considered to implement a restriction for all vehicles except buses and permit holders. A pre-trial consultation of this proposal took place in December 2020/January 2021; the results of that consultation are used to inform this proposal.</p>
<p>7. Please explain in detail the views of the relevant groups who have been consulted on the issues involved and the dates when this happened. (please use a separate sheet if necessary)</p>	<p>As part of the development of the original “except buses and permit holders” restriction, we engaged with the residents of Swyncombe Avenue together with local councillors as part of a working group. We also received numerous enquiries from residents on the traffic issues due to the implementation of Low Traffic Neighbourhood 21 (LTN21), a scheme implemented in the summer of 2021 by the London Borough of Ealing to restrict east-west movements to the north of Swyncombe Avenue. Ealing has since removed LTN21</p> <p>A pre-trial consultation on the “except buses and permit holders” restriction eastbound from Boston Manor Road was undertaken between 19 December 2020 and 17 January 2021. Consultation letters were sent to 4,458 households in the surrounding areas of Ealing and Hounslow boroughs. 532 responses were received during the consultation period.</p>

<p>8. Taking into account the views of these groups, and the available evidence, please clearly state the risks associated with the decision, weighed against the benefits of the decision. Will the effects be high, medium or low?</p> <p>High – Effect is likely to be high if the savings proposal has significant relevance to the substance of the equality duty. So consider size and scale of effect of policy/savings proposal or service restructure on staff, users/residents and other affected stakeholders. The effects can also be high if there is a potential for challenge of breach of equalities duties from affected stakeholders who have a protected equality characteristic (see overview of legal duties below).</p> <p>Medium – If your proposal is not assessed as high or low then it is likely to be medium risk. Due regard given to the equality duties must be commensurate with the impact of the policy/proposal or decision.</p>	<p>There is little evidence assessed with relevance to the provisions of the Equality Act; which identifies that there may be some impact on equalities groups. Therefore, the impact is seen as medium at this stage.</p>
<p>9. What are the main conclusions and key actions/ recommendations of this equality analysis? Set out what actions you can take to mitigate any findings of adverse effects. Set out fully the actions you propose in the Action Plan below.</p> <p>(You can use the information in sections 10 and 11 below to inform the main report to members under the section on ‘Equalities and Human Rights Implications’. You do not need to attach this form with your Executive Report. By adding the conclusions and the key actions and recommendations to the main report you do not need to separately publish this form)</p>	<p>The Council has considered the relevance of the proposal to the provisions of the Equality Act 2010 and the Human Rights Act 1998 and concluded that Equalities Duties are engaged by this proposal. It is considered necessary to engage with specific equalities groups. However, initial engagement has been carried out and will be ongoing if the trial is approved.</p>

Signed (completing officer) _____

Signed (Manager) _____

Equalities Analysis Action Plan

Where the equality analysis indicates a potential negative impact, consideration should be given to means of reducing or mitigating the negative effects. At this stage an Action Plan should be developed to address any concerns/issues raised in your analysis. You should also consider arrangements for reviewing the actual effect of the proposals annually once they have been implemented if appropriate. The plan should be adopted as Equality Objectives and integrated in your Service or Business Plan.

If relevant please list below any recommendations for action that you plan to take as a result of this equality analysis.

Issue	Action Required	Lead Officer	Time scale	Resource Implications	Comments

Appendix 1

Is the policy/savings proposal/restructure/transformation decision likely to breach equalities duties below? If the proposal/policy is not remote or peripheral to the substance of the duties set out below then an Equality Analysis is relevant.

Overview of Equality Act 2010 General Public Sector Equalities duties

Equality Act 2010 - Section 149, Part 11, Public Sector Equality Duty

(1) A public authority must, in the exercise of its functions, have due regard to the need to-

- (a) Eliminate discrimination, harassment, victimisation and eliminate any other conduct that is prohibited by or under the Act;
- (b) Advance equality of opportunity between persons who share a relevant protected characteristic and person who do not share it;
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it;

(2) A person who is not a public authority but who exercises public functions must, in the exercises of those functions, have due regard to the matters mentioned in subsection 1 above.

(3) Having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to-

- a) remove or minimise disadvantages suffered by persons who share a relevant characteristic that are connected to that characteristic;
- b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

(4) The steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities.

(5) Having due regard to the need to foster good relations between person who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:

- a) Tackle prejudice, and
- b) Promote understanding.

(6) Compliance with the duties in this section may involve treating some persons more favourably than other; but that is not to be taken as permitting conduct that would otherwise be prohibited by or under this Act.

(7) The relevant protected characteristics are:

- a) Age;
- b) Disability;
- c) Gender reassignment;
- d) Pregnancy and maternity;
- e) Race;
- f) Religion or belief;
- g) Sex;
- h) Sexual orientation.

Equality Act 2010 - Section 20, Part 2 - Duty to make adjustments for disabled people

- (1) Where a provision, criterion or practice of a public body puts a disabled person at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.
- (2) Where a physical feature puts a disabled person at a substantial disadvantage in relation matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to avoid the disadvantage.
- (3) Where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled, to take such steps as it is reasonable to have to take to provide the auxiliary aid.

Under Section 39, Part 5 of the Equality Act 2010, Employers must not discriminate against or victimise an employee:

- as to the terms of employment;
- in the way they make access to opportunities for promotion, transfer or training or for receiving any other benefit, facility or service;
- by dismissing the employee; or subjecting them to any other detriment;
- Employers must ensure that they do not deny workers access to benefits because of a protected characteristic.
- Where denying access to a benefit or offering it on less favourable terms the employer must be able to objectively justify the rule or practice as a proportionate means of achieving a legitimate aim.

Sections 64 and 65 relate to equal pay between men and women.

- These equal pay provisions apply to all contractual terms including wages and salaries, non-discretionary bonuses, holiday pay, sick pay, overtime, shift payments, and occupational pension benefits, and to non-monetary terms such as leave entitlements or access to benefits.
- Other sex discrimination provisions apply to non-contractual pay and benefits such as purely discretionary bonuses, promotions, transfers and training and offers of employment or appointments to office.

Appendix 2

Human Rights Act 1998 which came into force in 2000

Does your proposal breach any of these Articles

Article 2 - Right to Life

Article 3 - Protection from torture and inhuman or degrading treatment or punishment

Article 4 - Protection from slavery and forced or compulsory labour

Article 5 - The right to liberty and security of person

Article 6 - The right to a fair trial

Article 7 - Protection from retrospective criminal offences

Article 8 - The protection of private and family life

Article 9 - Freedom of thought, conscience and religion

Article 10 - Freedom of expression

Article 11 - Freedom of association and assembly

Article 12 - The right to marry and found a family

Article 14 - Freedom from discrimination

For more information contact:

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Revised January 2013