

# Equalities Analysis Assessment

## 1. Proposal Summary Information

EAA Title	<b>School Streets</b>
Please describe your proposal?	<b>Implementation of 13 experimental school streets</b>
Is it HR Related?	<b>No</b>
Corporate Purpose	<b>Officer decision</b>

### 1. What is the Scheme looking to achieve? Who will be affected?

School Streets is a scheme where the streets near a school are closed to most vehicles at school opening and closing times. Closing the streets to school and through traffic helps to achieve a safer, more pleasant environment for everyone using the streets whilst maintaining access for residents and businesses within the zone, and all pedestrians and cyclists.

Signs at the entrances to the scheme will inform drivers of the restrictions. Non-registered vehicles will not be allowed to enter the scheme during the times of operation.

The School Street will be enforced by a physical barrier that is in place for the duration of the agreed times. Volunteers from the school or community will manage the barriers and ask drivers of unauthorised vehicles not to enter the area. They will move the barrier for permit holders, those with dispensation and emergency vehicles.

Two School Streets include installation of a one-way route to enable an effective scheme to be implemented.

Dispensation is given to residents and businesses within the zone, blue badge holders, school staff and all emergency service vehicles. Other vehicles, including parents dropping off school children and deliveries, are not permitted to access the School Street.

The schemes are being implemented using funding from the London Streetspace Plan, which is a central Government fund (administered by TfL) in response to the COVID emergency. School Streets are usually implemented to encourage walking, scooting or cycling, improve air quality and reduce road danger outside of schools. However, a vital additional purpose for the COVID-19 recovery is to provide additional space outside of schools so that parents/carers can drop off and collect their children whilst safely social distancing. Schools have helped with staggered start and end times, widening their entrances as much as possible and using additional entrances and/or one-way systems where possible.

Schemes are being implemented using mobile barriers and will utilise an Experimental Traffic Order (ETO) which can stay in force for up to 18 months prior to the decision on whether to make them permanent or not. This allows for consultation on and monitoring of impacts and changes can be made to the scheme where adverse impacts become apparent.

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Schools chosen to participate in these schemes have already tried other means of improving the road environment around the school gates. One of the selection criteria for this programme is that schools have achieved, or are working towards achieving, a TfL Stars accreditation. They will have tried publicity, training and promotion activities to improve the situation, often with limited success.

Schools will support their scheme by continuing to promote active travel and raising awareness of road safety for the school journey.

## 2. What will the impact of your proposal be?

The overall benefits of Schools Streets are:

- Reduced school related parking and congestion at the school gates, within the school street zone,
- Improved environment for safe and sustainable travel to school
- Raised awareness of active travel and encouraging walking, scooting and cycling by the school community
- Improved mental and physical health and well being by increasing active travel
- Reduced air pollution through the reduction in car use

The scheme will help to achieve the 3 core objectives of the LBE Transport Strategy:

- Modeshift – *increasing active travel*
- Reducing the environmental footprint of transport – *improve air quality*
- Improving road safety – *reduce road safety incidents*

Whilst these are the first School Streets in Ealing these schemes have been successfully implemented in many Local Authorities in London and nationally, including industry leaders Hackney, Camden, Birmingham, Solihull and Edinburgh, using various types of enforcement. The result is a reduction in traffic around the school gates and more children walking, cycling or taking public transport to their school, instead of being dropped off by car, at the school gate.

Resources and research supporting the implementation of School Streets to increase active travel can be found on this website: <http://schoolstreets.org.uk/resources/> This includes a review of 16 existing School Streets, showing that these closures can improve the number of children walking, cycling and wheeling to school without creating road safety problems. <https://www.napier.ac.uk/about-us/news/school-street-closures>

The school run makes up over a quarter of London's morning traffic. In Ealing 85% of primary pupils live up to 1 mile from school but only 69% travel actively to school. The proportion of car journeys (totalling 23% in 2017/18, down from 25% in 2016/17) is higher than the number of pupils living over 1 mile from school, suggesting that a number of these car journeys are short (less than one mile) and therefore walkable or cycleable.

Residents in surrounding streets may be concerned that there will be increased congestion for them. We will be working with school communities to identify and promote locations away from schools where parents can park; this should disperse the cars over a wider area than at present. Experience

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from other Boroughs shows that residents in surrounding roads are not adversely affected as parking by families who choose or need to drive will be dispersed over a much wider area.

A research report has been published by Edinburgh Napier University on displacement of traffic and road safety following the implementation of school streets <https://www.napier.ac.uk/about-us/news/school-street-closures>. The findings show traffic displacement doesn't cause road safety issues in neighbouring streets.

## 2. Impact on Groups having a Protected Characteristic

**AGE:** *A person of a particular age or being within an age group.*

**Positive and negative impact**

**Describe the Impact**

### CONSTRUCTION

Construction is the installation of road signs. These will be fixed to existing poles where possible, or new poles installed if required. There will be no significant noise or obstruction. The impact is, therefore considered to be **neutral**.

### OPERATION

If a particular person is wholly or mostly dependent on car or vehicular travel (e.g. older people with a significant mobility impairment), the operation of the finished scheme will have **no additional impact** as all residents of the school street, including those with mobility issues, will be able to apply for a permit allowing access during the closure time.

No buses are routed through any of the School Streets.

The impact on children and their families is expected to be **positive**. Road safety in the residential area is expected to be improved with lower traffic volumes allowing more walking and cycling in the area. No buses are routed through any of the School Streets.

For those who are able to walk and cycle and choose to utilise active travel modes, the scheme is expected to be **positive**. The expected reduction in traffic in the residential area is expected to make it more conducive to walking and cycling with an associated lower road safety risk.

The barriers will be manned at all times, therefore, emergency services will be able to access the road closures without having to stop as the barrier can be withdrawn in seconds, meaning that response times are expected to be largely unaffected. This may be perceived as a slight negative impact by some, but as the School Street is a low traffic zone and unauthorised vehicles will not be able to enter the area, Emergency Services may find the School Streets provide unhindered access for their vehicles which could help response times.

Officers have consulted and continue to work with the emergency services to resolve any significant issues, therefore, it is concluded that there will be **no significant impact**.

**Describe the Mitigating Action**

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All residents within the scheme will receive a permit. Residents can apply for additional permits for carers. Their visitors are not permitted to enter the zone and will be asked to arrive outside of the closure times. All blue badge holders are permitted to access the area at all times.

The road closure is enforced by a moveable barrier that is managed at all times by a volunteer Steward. A Stewarding Guidance document has been provided to all volunteers and training has been offered.

**DISABILITY:** *A person has a disability if s/he has 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<sup>1</sup>.*

### Positive, negative and neutral impacts

#### Describe the Impact

##### CONSTRUCTION

Construction is the installation of road signs. These will be fixed to existing poles where possible, or new poles installed if required. There will be no significant noise or obstruction. The impact is, therefore considered to be **neutral**.

##### OPERATION

No street furniture will be placed on the footway or block any desire lines at junctions, therefore, operation of the implemented scheme would be **neutral** for visually impaired people.

The moveable barriers are positioned in the Highway and will be stored at the school, not blocking the footway or desire lines at junctions.

If a particular person is wholly or mostly dependent on car or vehicular travel (e.g. a person with a significant mobility impairment or wheelchair users), the operation of the finished scheme will have **no additional impact**.

All blue badge holders are always permitted to access the area.

Parents or carers of a child with a blue badge will be granted a dispensation. Applications for temporary permits will be considered if access is an issue due to short term health or mobility issues.

Approved providers of Special Needs Transport will be permitted to enter the zone.

Operation of the implemented scheme is likely to generate a **slight positive impact** on an unknown number of people with breathing difficulties if traffic volumes within the residential area reduce and traffic volumes on the boundary roads remain broadly similar to pre-COVID volumes as expected due to reduced air pollution.

Operation of the finished scheme is likely to generate a **positive impact** on an unknown number of pedestrians and cyclists with mobility issues due to reduced traffic volumes making for a more pleasant, safer walking and cycling environment.

<sup>1</sup> Due regard to meeting the needs of people with disabilities involves taking steps to take account of their disabilities and may involve making reasonable adjustments and prioritizing certain groups of disabled people on the basis that they are particularly affected by the proposal.

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Emergency services will be able to access the road closures as the barriers are moveable quickly by the people manning the barrier meaning that response times are expected to be largely unaffected. This may be perceived as a ***slight negative impact***, but officers have consulted and will continue to work with the emergency services to resolve any significant issues that arise. As the School Street is a low traffic zone and unauthorised vehicles will not be able to enter the area, Emergency Services may find the School Streets provides unhindered access for their vehicles which would be a ***positive***.

**Describe the Mitigating Action**

Residents and business employees within the scheme will receive a permit. Residents can apply for additional permits for carers. Their other visitors are not permitted to drive into the zone and will be asked to arrive outside of the closure times or park in alternative streets. All blue badge holders are permitted to access the area at all times. Parents or carers of a child with a blue badge will be granted a dispensation.

Approved providers of Special Needs Transport will be permitted to enter the zone

Impacts will be closely monitored and any on-going adverse impacts will be taken into account as appropriate in the decision on whether to make the scheme permanent or not.

Ensure residents are aware of the proposal in advance so that alterative arrangements (e.g. new routes) are known.

**GENDER REASSIGNMENT:** *This is the process of transitioning from one sex to another. This includes persons who consider themselves to be trans, transgender and transsexual.*

**Neutral impact**

**Describe the Impact**

There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.

**Describe the Mitigating Action**

Not applicable.

**RACE:** *A group of people defined by their colour, nationality (including citizenship), ethnic or national origins or race.*

**Neutral Impact**

**Describe the Impact**

There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.

**Describe the Mitigating Action**

Not applicable.

**RELIGION & BELIEF:** *Religion means any religion. Belief includes religious and philosophical beliefs including lack of belief (for example, Atheism). Generally, a belief should affect a person's life choices or the way you live for it to be included.*

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<b>Neutral impact</b>
<b>Describe the Impact</b>
Staff of religious buildings within a School Street are offered a permit. If an attendee of a religious building is wholly or mostly dependent on car or vehicular travel (e.g. a person with a significant mobility impairment or wheelchair users), the operation of the School Street may generate a <b>low negative impact</b> initially. However, this is not specific to any religious belief so is covered more fully in the disability section of this EEA.
<b>Describe the Mitigating Action</b>
Staff of a religious building within the scheme can apply for permits. Visitors to the building are not permitted to enter the zone and will be asked to arrive outside of the closure times. All blue badge holders are permitted to access the area at all times.

<b>SEX: <i>Someone being a man or a woman.</i></b>
<b>Neutral impact</b>
<b>Describe the Impact</b>
Women are more likely to do most of the work involved in looking after children and other family members. in lockdown, mothers in two-parent households were only doing, on average, a third of the uninterrupted paid-work hours of fathers. <a href="https://www.ifs.org.uk/publications/14861">https://www.ifs.org.uk/publications/14861</a> According to the <a href="#">2014 National Travel Survey</a> , trips to escort children to school are more likely to be made by women aged 30 to 49. The School Streets may impact an unknown number of parents who drop children at school and go on to work and are therefore constrained by time. This may have a <b>low negative impact</b> .
<b>Describe the Mitigating Action</b>
Parents who feel they need to drive can park legally nearby and walk the last part of the journey. If available, information will be provided on locations where parents can park, such as supermarket, leisure centre car parks or Park & Stride areas. In Ealing, 84% of pupils live within 1 mile of their school. This is a 20 minute walk. 62% live within a ten minute walk of school.

<b>SEXUAL ORIENTATION: <i>A person's sexual attraction towards his or her own sex, the opposite sex or to both sexes.</i></b>
<b>Neutral impact</b>
<b>Describe the Impact</b>
There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.
<b>Describe the Mitigating Action</b>
Not applicable.

<b>PREGNANCY &amp; MATERNITY: <i>Description: Pregnancy: Being pregnant. Maternity: The period after giving birth - linked to maternity leave in the employment context. In the non-work</i></b>
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<i>context, protection against maternity discrimination is for 26 weeks after giving birth, including as a result of breastfeeding.</i>
<b>Neutral impact</b>
<b>Describe the Impact</b>
Greater reliance on car - little time impacts Emergency services will be able to access the road closures meaning that response times are expected to be largely unaffected. This may be perceived as a slight negative impact, but officers have consulted and continue to work with the emergency services to resolve any significant issues. As the School Street is a low traffic zone and unauthorised vehicles will not be able to enter the area, Emergency Services may find the School Streets provides unhindered access for their vehicles which would be a positive.
<b>Describe the Mitigating Action</b>
Impacts will be closely monitored and any on-going adverse impacts will be taken into account as appropriate in the decision on whether to make the scheme permanent or not.  If required a permit can be requested.

<b>MARRIAGE &amp; CIVIL PARTNERSHIP:</b> <i>Marriage: A union between a man and a woman, or of the same sex, which is legally recognised in the UK as a marriage</i> <i>Civil partnership: Civil partners must be treated the same as married couples on a range of legal matters.</i>
<b>Neutral impact</b>
<b>Describe the Impact</b>
There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.
<b>Describe the Mitigating Action</b>
Not applicable.

<b>3. Human Rights<sup>2</sup></b>
<b>4a. Does your proposal impact on Human Rights as defined by the Human Rights Act 1998?</b> Articles 1 and Article 8 of the Protocol to the European Convention of Human Rights (which are enshrined in the 1998 Act) confirm as follows  Article 1 "Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and the general principles of international law. The preceding provisions shall not, however, in any way impair the right of the state to enforce such laws as it deems necessary to control the use of property in accordance with the general interest...."

<sup>2</sup> For further guidance please refer to the Human Rights & URNC Guidance on the Council Equalities [web page](#).

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Article 8 "Everyone has the right to respect for his private and family life, his home and his correspondence. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country. For the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others'.

To the extent that Articles 1 and/or 8 applies it is considered that the decision to introduce experimental traffic orders to create LTNs is justified in the public interest given the anticipated positive outcomes outlined above.

**4b. Does your proposal impact on the rights of children as defined by the UN Convention on the Rights of the Child?**

Yes, the proposed School Streets scheme considers the impact on children and the impact on their physical safety and well-being.

**4c. Does your proposal impact on the rights of persons with disabilities as defined by the UN Convention on the rights of persons with disabilities?**

Yes, the proposed School Streets scheme has considered the accessibility issues for persons with disabilities to live independently. This includes the identification and elimination of obstacles and barriers to accessibility

### 4. Conclusion

There are not expected to be any significant impacts on any equalities group. But impacts will be closely monitored and any on-going adverse impacts will taken into account as appropriate in the decision on whether to make the scheme permanent or not.

**4a. What evidence, data sources and intelligence did you use to assess the potential impact/effect of your proposal? Please note the systems/processes you used to collect the data that has helped inform your proposal. Please list the file paths and/or relevant web links to the information you have described.**

- Data available from Office of National Statistics
- Evidence from other School Streets installations - <http://schoolstreets.org.uk/resources/>
- Evidence from research of School Street installations - <https://www.napier.ac.uk/about-us/news/school-street-closures>

**5. Action Planning: (What are the next steps for the proposal please list i.e. when it comes into effect, when mitigating actions<sup>3</sup> will take place, how you will measure impact etc.)**

Action	Outcomes	Success Measures	Timescales/ Milestones	Lead Officer (Contact Details)

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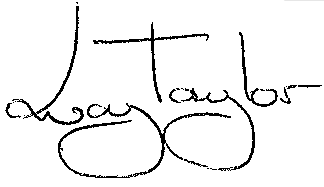
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Provide permits to allow access for residents, staff of businesses and organisations within the scheme and others who are exempt	Exempt vehicles have access to the School Street at all times	<ul style="list-style-type: none"> <li>Residents receive permits in their information pack</li> <li>Residents and others apply for permits via school street mailbox. These are posted or hand delivered within 5 working days</li> </ul>	From August 2020 for the duration of the scheme	Transport Planning Service
Closure enforced by a moveable barrier	Barrier to be managed and moved by a steward as required for permit holders and others who are exempt	<ul style="list-style-type: none"> <li>Stewards move the barrier effectively, in a timely manner</li> </ul>	From start date and during operating times	Transport Planning Service
Walk to school maps are provided, if available. And active travel is promoted by the schools	Families have information on walking routes and suitable Park & Stride locations. Schools are engaged in STARS programme	<ul style="list-style-type: none"> <li>Hard copy maps posted to schools and PDF versions provided to share with families and their websites</li> <li>Schools achieve or maintain STARS accreditation</li> </ul>	Maps provided during Autumn term STARS accreditation is approved in Summer term	Transport Planning Service
Set up and communicate a feedback mechanism	Allow residents, businesses and stakeholders to report any issues that may impact an equalities group	<ul style="list-style-type: none"> <li>School Streets mailbox open and receiving emails</li> </ul>	Prior to 1 <sup>st</sup> School Street installation	Transport Planning Service
Implement monitoring regime	Scope, obtain or survey items for monitoring (mode of travel data, photographic evidence before/after.) Seek feedback from school community on implementation of the scheme	<ul style="list-style-type: none"> <li>Collection of data</li> <li>Collection of feedback</li> </ul>	All data to be collected prior to final review report	Transport Planning Service
Use of industry standards and guidelines in design	Minimise any negative impacts on any equalities group	<ul style="list-style-type: none"> <li>Undertake audit</li> </ul>	2 months after installation	Highways
Consider all impacts on	Avoid adding to/ removing elements	<ul style="list-style-type: none"> <li>Undertake audit</li> </ul>	2 months after installation	Highways

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equalities group as part of the design	which specifically and significantly negatively impact on any equalities group			
<b>Additional Comments:</b> None.				

**6. Sign off: (All EAA's must be signed off once completed)**

Completing Officer Sign Off:	Service Director Sign Off:	<i>HR related proposal (Signed off by directorate HR officer)</i>
<p>Signed:</p>  <p>Name (Block Capitals): Chris Cole</p> <p>Date: 22<sup>nd</sup> October 2020</p>	<p>Signed:</p>  <p>Name (Block Capitals): Lucy Taylor</p> <p>Date: 22<sup>nd</sup> October 2020</p>	<p>Signed:</p> <p>Name (Block Capitals):</p> <p>Date:</p>
<p>For EA's relating to Cabinet decisions: received by Committee Section for publication by (date)</p>		

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## Appendix 1: *Legal obligations under Section 149 of the Equality Act 2010:*

- As a public authority we must have due regard to the need to:
  - a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
  
- The protected characteristics are: AGE, DISABILITY, GENDER REASSIGNMENT, RACE, RELIGION & BELIEF, SEX, SEXUAL ORIENTATION, PREGNANCY & MATERNITY, MARRIAGE & CIVIL PARTNERSHIP
  
- Having due regard to advancing equality of opportunity between those who share a protected characteristic and those who do not, involves considering the need to:
  - a) Remove or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
  - b) Take steps to meet the needs of persons who share a relevant characteristic that are different from the needs of the 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.
  
- Having due regard to fostering good relations between persons who share a relevant protected characteristic and persons who do not, involves showing that you are tackling prejudice and promoting understanding.
  
- Complying with the duties may involve treating some people more favourably than others; but this should not be taken as permitting conduct that would be otherwise prohibited under the Act.