

Equality Impact Assessment / Equality Analysis

Title of service or policy	City Centre Security Project – Proposed Access Restrictions
Name of directorate and service	Place Management - 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	Updated March 2022

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 – Counter-Terrorism Security Advisors and stakeholder organisations to improve security to key crowded streets and spaces within the city centre, particularly those areas vulnerable to hostile vehicle attack.</p> <p>Whilst there is no specific terrorism threat to Bath at present, counter terrorism advisors 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 is being delivered through the Council's Highways department with collaboration with its Emergency Management Team, although there is also</p>

	<p>frequent liaison with all internal service providers affected.</p> <p>In accordance with the Council's Public Sector Equality Duty (as set out in the Equality Act 2010), and as set out in the Cabinet Report E3278 and approved on 20 July 2021, a disabled person with a valid Blue Badge, either driving (including a hire car), drop-off/ picking-up by a friend, family or taxi will still be able to access Cheap Street, Westgate Street, Saw Close and Upper Borough Walls during operational hours. Blue badge holder parking is permitted on the proposed double yellow lines (No Waiting at any time) for up to 3 hours. During the restricted hours 10.00am to 6.00pm, there should be no delivery vehicles making deliveries, giving more opportunity for Blue Badge Holders to park. Community Transport vehicles are permitted into Hot Bath Street to access St Michael's Day Centre. Beau St is not part of the proposals to restrict vehicles and therefore parking for Blue Badge Holder's outside The Gainsborough Hotel remains as existing. Also, the existing parking arrangements on Beau Street between Bilbury Lane and Stall Street are not affected. Stall St (including Lower Borough Walls, Bath St, Abbeygate St and Abbey Green) are already subject to access restrictions between 10.00am and 6.00pm, due to the volume of pedestrians that use the streets on a daily basis.</p> <p>Following the July Cabinet decision, the Council involved disabled people and other stakeholders via focus groups (held on 15th and 17th November 2021) to create a system to enable Blue Badge Holders to gain access into the security zone in a vehicle. It also provided an opportunity to obtain feedback on further accessibility improvements within the security zone (e.g. dropped kerbs, raised tables etc). Project communications in the form of press releases and web pages have provided continuous project updates. All Blue Badge Holders in B&NES were written to, in order to outline the new access arrangements, which has also been followed up with a dedicated webpage, press releases and user video</p> <p>The permanent access restrictions started on 1st January 2022. Feedback so far on the operation of the scheme has been positive, with data provided by</p>
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		security marshals suggesting that BBH access is relatively simple, with no reported problems with either access into the security zones or parking capacity. (see information on access in 2.4). The operational scheme does not include York St, which is now subject to a Public Inquiry, as an objection to the advertised ATTRO/ TRO could not be resolved.
1.2	Provide brief details of the scope of the policy or service being reviewed, for example: <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? 	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.
1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	The key objective of the project is the protection of key crowded spaces within the central core of the city centre.

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. Additional equalities training was provided in December 2021 for all CCTV staff and Marshals. This was to ensure that the team would be ready to manage the access restrictions (and enable Blue Badge Holder access) when the new arrangements started on the 1 st January 2022. The training focused on ensuring staff were able to provide advice on access queries, that any checking or vetting of people would be carried out in a fair, sensitive and consistent manner, and that disabled people would be supported in their access requirements.
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.

		<p>The following shows the data for Blue Badge access into the zone for the first three months of operation:</p> <table border="1"> <thead> <tr> <th></th> <th>JAN</th> <th>FEB</th> <th>MAR</th> <th>Totals</th> </tr> </thead> <tbody> <tr> <td>Taxi Private Hire</td> <td>9</td> <td>16</td> <td>17</td> <td>42</td> </tr> <tr> <td>Own Transport Pick up drop off</td> <td>56</td> <td>28</td> <td>10</td> <td>94</td> </tr> <tr> <td>Own Transport parking</td> <td>443</td> <td>403</td> <td>402</td> <td>1248</td> </tr> <tr> <td>TOTAL BBH MOVEMENTS</td> <td>508</td> <td>447</td> <td>429</td> <td>1384</td> </tr> </tbody> </table>		JAN	FEB	MAR	Totals	Taxi Private Hire	9	16	17	42	Own Transport Pick up drop off	56	28	10	94	Own Transport parking	443	403	402	1248	TOTAL BBH MOVEMENTS	508	447	429	1384
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<p>2.5</p>	<p>What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>Full details of the consultation that took place as part of the project are listed on the Bath City Centre Security consultation web pages</p> <p>16 November 2020 - 31 January 2021 Public consultation - seek views on draft proposals prior to proceeding to traffic regulation orders https://beta.bathnes.gov.uk/bath-city-centre-security-consultation</p> <p>19 May - 1 June 2021 Public feedback - on 19 May 2021 the council published the findings of the independent accessibility study as well as the summary of feedback received during the public consultation that ran earlier that year. This was to give people the opportunity to examine the extensive work carried out to address access concerns raised and develop mitigations - all well in advance of the cabinet meeting discussion and final decision. If people having read the reports wished to add further comments for consideration by the Cabinet they provides these via an online feedback form. https://beta.bathnes.gov.uk/bath-city-centre-security-consultation-update</p> <p>23 Sept - 14 Oct 2021 Public consultation - seek final views on traffic regulation orders https://beta.bathnes.gov.uk/citycentresecuritytroconsultation</p> <p>Online consultation and bookable public info sessions 28 September, 10am</p>																									

	<p>to 2pm; 4 October, 3pm to 6pm; 12 October, 1pm to 5pm. These information sessions gave members of the public, including disabled people, a chance to hear directly from us about the detail of the scheme, the rationale, and also for us to be able to understand their concerns and work with them to address these where possible.</p> <p>A variety of methods were used, and different formats were available (such as Easy read; Braille etc).</p> <p>The proposals were shared with the Active Travel and Accessibility Forum and the Independent Equality Advisory Group.</p> <p>The Council also involved disabled people and other stakeholders via focus groups (held on 15th and 17th November 2021) to create an easy to use system to enable Blue Badge Holders to gain access into the security zone in a vehicle. It also provided an opportunity to obtain feedback on further accessibility improvements within the security zone (e.g. dropped kerbs, raised tables etc).</p> <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>
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		Consultation took place with B&NES internal teams to determine potential effect on Council wide services and operations. This has included the Council's Adult Social Care 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.	
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 was made, the ATTRO/TRO was 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.	
3. Assessment of impact: 'Equality analysis'			
	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: <ul style="list-style-type: none"> • Meets any particular needs of equalities groups or helps promote equality in some way. • Could have a negative or adverse impact for any of the equality's groups 		
		Potential positive impacts of the proposals to increase city centre security	Potential negative impacts and what could be done to alleviate these?
	All groups	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	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.

		potential causalities/ loss of life and also severe impacts on the economy of Bath and potentially the wider region.	
3.1	Sex – identify the impact/potential impact of the policy on women and men.	No particular positive impacts have been identified on the grounds of sex and gender.	<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 safety and perceived safety in the implementation phases. Consideration should be given to more public space CCTV, and improved street lighting. It should be noted that drop off and pick up are possible from 6pm on all streets that are part of the sealed orders.</p>
3.2	Pregnancy and maternity	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>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>No particular issues have been raised now that the scheme is in operation. Moving forwards, consideration should be given to more public space</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>CCTV, and street lighting. It should be noted that drop off and pick up are possible from 6pm on all streets that are part of the sealed orders.</p>
3.3	Transgender – – identify the impact/potential impact of the policy on transgender people	<p>No positive impacts were identified in relation to transgender people.</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. Consideration should be given to more public space CCTV, and improved street lighting. It should be noted that drop off and pick up are possible from 6pm on all streets that are part of the sealed orders.</p>
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</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).

		<p>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>	<ul style="list-style-type: none"> • Access for residents <p>A full <u>Accessibility Study</u> 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 was agreed in part by Cabinet who based their decision on the need to balance access requirements alongside security risks. Access was given to blue badge holders to park and be dropped off and collected in Cheap Street, Westgate Street, Saw Close, Parsonage Lane and Upper Borough Walls). • For deliveries, the Council should work with customers and residents to ensure that access is as easy as possible whilst ensuring that the security objective remains in place. Dialogue is continuing with residents, in particular St John's Foundation on Hot Bath St and is largely working well. <p>The Accessibility Study also explored a number of possible mitigations:-</p> <ul style="list-style-type: none"> • 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). This has been done see Map of BBH parking
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			<ul style="list-style-type: none"> • 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). These will be provided on completion of the Hostile Vehicle Mitigation bollards • 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. <p>Additional disabled parking spaces have been provided near the restricted streets, such as Westgate Buildings and Orange Grove. A series of footway improvements are proposed for the restricted streets and nearby adjoining streets to improve access for older people and disabled persons. Parklets are also proposed within Cheap Street and Westgate Street to provide places for the elderly or those with impaired mobility to rest and will be delivered on completion of the HVM works</p>
3.5	Age – identify the impact/potential impact of the policy on different age groups	For some older people, restricting traffic to the proposed areas could	Many of the issues outlined in 3.4 also apply to older people. Within the consultation, there were a lot of issues raised in relation to vulnerable groups, which

Commented [ST1]: Need to check with GP that this has been included within 2022/ 23 TIP

Commented [ST2R1]: In discussion with Shane, the intention is for this to be delivered within the 2022/23 TIP. Lynda – please can you confirm.

		<p>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>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>The use of taxi by Blue Badge Holders to enable drop-off within the restricted streets is permitted, as long as the passenger has a valid Blue Badge available to show at the gate.</p> <p>It was noted that particular services 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 has been addressed in the implementation phases and Focus Groups, discussions with St Michaels Day Centre, Age UK, and St John’s Foundation residents. AgeUK buses are an exempt group within the Traffic Regulation Order (TRO), allowing continued access in and out via Hot Bath St. The Council, in dialogue with St John’s Foundation, have an agreed methodology for access to resident families and operation needs of the organisation, whilst retaining security objectives. Regular dialogue with St John’s will ensure that no issues are encountered.</p>
3.6	Race – identify the impact/potential impact on different black and minority	No positive impacts identified	No issues were raised within the consultation. Some groups are more vulnerable to hate crime. There are

	ethnic groups		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. Consideration should be given to more public space CCTV, and improved 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. Consideration should be given to more public space CCTV, and improved street lighting. It should be noted that drop off and pick up are possible from 6pm on all streets that are part of the sealed orders.
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	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. Following implementation, no issues have been raised by BBHs about on-street parking capacity within the zone

Commented [ST3]: The design for HVM around Cheap St has been discussed with the Abbey and in general have no issue. Wedding and funeral vehicles generally park on Orange Grove, a short walk from the east wing doors.

Commented [ST4R3]: Unable to speak to the person in the Abbey at the moment to request specific information regarding disabled access

	a local priority).		
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
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.				
Training for CCTV staff	Equalities training for CCTV and Marshalls to enable sensitive operation of the scheme, supporting disabled people's access	A series of training sessions took place in December 2021	Ian Cousins Louise Murphy	December 2021
Safety issues - Explore CCTV coverage and lighting	Consider CCTV coverage and lighting	Consider CCTV coverage and lighting		Ongoing
Access for Age UK /St John's	Meetings to take place (when)	Access arrangements agreed to enable access via Hot Bath St with	Dan Noad	Ongoing

Foundation users to St Michael's Day Centre		appropriate security protocols		
Explore and increase parking provision for Blue Badge Holders adjacent to the zone	Done	See Map of BBH parking	Andrew Dunn	Ongoing
Explore further improvements to the public realm (such as improvements to footway surfaces, tactile surfaces, lighting, seating etc)	Focus Group took place on 17 Nov. Also further access visit with representatives of the Focus Group from RNIB and access B&NES. Design Team from CCS and Highways colleagues Parklet designs shared with Focus Group on 17 Nov	Improvements to the public realm will be explored as the project moves forwards.	Steve Froggatt	Ongoing

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 (Director of Place Management)

Date: