

## Equality Impact and Outcome Assessment (EIA) Template - 2019

**EIAs make services better for everyone and support value for money by getting services right first time.**

EIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then action plan to get the best outcomes for staff and service-users<sup>1</sup>. They analyse how all our work as a council might impact differently on different groups<sup>2</sup>. They help us make good decisions and evidence how we have reached these decisions<sup>3</sup>.

See end notes for full guidance. Either hover the mouse over the end note link (eg: Age<sup>13</sup>) or use the hyperlinks ('Ctrl' key and left click).

**For further support or advice please contact:**

- **BHCC: Communities, Equality and Third Sector Team on ext 2301**
- **CCG: Engagement and Equalities team (Jane Lodge/Debbie Ludlam)**

### 1. Equality Impact and Outcomes Assessment (EIA) Template

First, consider whether you need to complete an EIA, or if there is another way to evidence assessment of impacts, or that an EIA is not needed<sup>4</sup>.

<b>Title of EIA<sup>5</sup></b>	Department for Transport 'Zebra2' Bid	<b>ID No.<sup>6</sup></b>	62
<b>Team/Department<sup>7</sup></b>	Transport Projects and Engineering		
<b>Focus of EIA<sup>8</sup></b>	<p>The Department for Transport (DfT) have launched ZEBRA 2, which will provide £129 million to support the introduction of Zero Emission Buses in financial years 2023 to 2024 and 2024 to 2025. This will be a single-stage funding competition to award funding over both financial years. Successful bidders will be awarded the majority of their funding in financial year 23/24.</p> <p>Brighton &amp; Hove City Council as the Local Transport Authority will be looking to make a bid in partnership with local bus operators including Brighton &amp; Hove Buses, the majority operator in the city. If successful, the bid would see the delivery of an agreed number of battery electric buses to replace diesel buses on routes within the city of Brighton &amp; Hove.</p>		

All bus operators within the Brighton & Hove boundary were contacted regarding the ZEBRA 2 funding opportunity to confirm if they could participate. At the time of writing this Equality Impact Assessment focuses on the detailed proposal from Brighton & Hove Buses. If another operator joins the bid with a detailed proposal, the equality impact assessment will be updated to reflect the wider scope.

The proposal from Brighton & Hove Buses focuses on the number 7 bus route in the city of Brighton & Hove.

The number 7 route is a critical bus route in the city and the justification for this route being proposed for the Zebra 2 bid include:

- The 7 bus route is one of the most popular bus routes in the city.
- A high frequency service that runs 24/7 (excluding Christmas timetable reductions) and operates 365 days a year.
- The 7 bus route runs through a large section of the city centre Air Quality Management Area (AQMA) along with the Air Quality Management Area on Eastern Road outside the Royal Sussex County Hospital.
- The 7 bus route length, topography and termination near a bus operator depot, for charging requirements, make it an ideal candidate for the deployment of electric vehicles
- The 7 bus route directly serves and connects passengers to the two biggest railway stations in the city in line with central government's national bus strategy for England 'Bus Back Better' aims for integration between bus and rail networks.
- The 7 bus route provides a public transport connection between the city's two biggest railway stations with the main city hospitals, the Royal Alexandra Children's Hospital and the Royal Sussex County Hospital, which have A&E and specialist departments serving patients from across the South East. The connection is vital in ensuring accessibility to healthcare through public transport.
- The 7 bus route serves many key destinations of the city including the city centre, multi-mode transport interchanges, leisure attractions, retail areas as well as the city hospitals.
- The 7 bus route is a key public transport connection for areas of deprivation such as Whitehawk.
- The 7 bus operates on a route that is subject to other Bus Service Improvement Plan (BSIP) schemes that aim to improve key bus service metrics.

The Brighton & Hove City Council Carbon Neutral Programme refers to a 2018 estimate that "Over a third of Brighton & Hove's carbon emissions come from transport, which includes estimates for shipping and plane flights by Brighton & Hove residents". The document sets out that a shift to public transport and a switch from internal combustion engine vehicles to zero emission vehicles are important steps in achieving carbon emission reductions and improving air quality.

A successful Zebra 2 bid would secure considerable investment for the city and the potential benefits, namely the reduction in air pollution and carbon emissions through a switch to zero emission buses on a key route that runs through the city centre Air Quality Management Areas (AQMA), could be critical in helping to realise the Brighton & Hove City Council goal of the city becoming Carbon Neutral by 2030.

Buses are a fundamental and highly used part of the city's public transport network. Prior to the Covid-19 pandemic, Brighton & Hove experienced considerable growth in bus use over a number of years. This resulted in the city having the highest bus use outside of London with 172 bus trips per head in 2018-19. This compared to a combined figure of 39 for local authority areas in the South East, 247 for London and 77 for England as a whole. Passenger numbers are continuing to recover following the pandemic and the Bus Service Improvement Plan (BSIP) sets out ambitious plans to see passenger numbers increase 15% on the 2018-19 baseline by 2030. A successful Zebra 2 bid could deliver a transformational development for the local bus fleet that could further advance the positive perception of and active use of buses in the city.

This Equality Impact Assessment looks specifically at the potential impacts, both positive and negative, related to the deployment of electric buses over existing diesel buses. This report does not try to assess impacts of buses or bus travel in the city more broadly, however the assessment does consider the opportunities to advance equalities through the acquisition, subject to a successful bid, of electric buses with the latest technological and accessibility improvements that could benefit protected characteristic groups even where no potential negative impacts of this specific bid have been identified.

## 2. Update on previous EIA and outcomes of previous actions<sup>9</sup>

<b>What actions did you plan last time?</b> (List them from the previous EIA)	<b>What improved as a result?</b> What outcomes have these actions achieved?	<b>What <u>further</u> actions do you need to take?</b> (add these to the Action plan below)

### 3. Review of information, equality analysis and potential actions

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
<b>Age<sup>14</sup></b>	<p>The city's population is predicted to get older, with the greatest projected increases by broad age band in the 60-69 years and 80-84 years categories.</p> <p>One in five residents aged 60 years or over (18.7%, 9,900 people) are living in income deprivation (2021)</p> <p>15% of children live in poverty (2019).</p> <p>There are 35,004 older person's bus pass holders in the city. These bus passes provide travel for eligible holders between 9am and 4am weekdays and anytime at the weekend.</p> <p>13,875 residents aged 66+ (38%) live alone (2021).</p> <p>4.2% of 65+ year olds have a record of dementia (2020)</p>		<p><b>General Comments</b>            There is no evidence that changing to an electric bus fleet on the proposed route would result in changes to the cost of travel for passengers of any age.</p> <p><b><u>Potential Positive Impacts</u></b>            The proposal offers potential for improved air quality, reducing the risk of health impacts throughout life as a result of air pollution.</p> <p>A large proportion of the proposed route operates in the city centre Air Quality Management Areas and therefore would potentially contribute to a reduction in air pollution in key areas of the city.</p> <p>Reduction in noise</p>	<p>The local authority and the operator will continue to encourage use of concessionary bus passes.</p> <p>The concessionary bus passes available in Brighton &amp; Hove offer longer daily hours of validity than other areas of England.</p> <p>Brighton &amp; Hove City Council and the operator will continue to encourage use of existing central government funded fare offers (£2 cap) and Bus Service Improvement Plan (BSIP) funded bus fare offers such as '£5 do it all in a day' plus free and discounted travel for children and young people.</p> <p>The operator, as per the requirement of the bid, will specify the new electric buses to have an enhanced</p>

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	<p>5.3% of adult mortality (30+) is attributable to particulate air pollution (2022) (5.4% South East, 5.5% England)</p> <p>In a report detailing the outcomes of air pollution by Environmental Research Group of Imperial College London the health impacts from air pollution listed for the Adulthood life stage include:</p> <ul style="list-style-type: none"> <li>• Early death</li> <li>• Cardiac health</li> <li>• Stroke</li> <li>• Brain and mental health</li> <li>• Respiratory health</li> <li>• Cancer</li> <li>• Multiple chronic illnesses</li> </ul> <p>In a report detailing the outcomes of air pollution by Environmental Research Group of Imperial College London the health impacts from air pollution listed for the Developing Child life stage (from birth, through adolescence) include:</p> <ul style="list-style-type: none"> <li>• Lung growth</li> <li>• Asthma</li> </ul>		<p>pollution from electric vehicles. The proposed route operates within the city centre and key corridors and therefore residents and visitors of all ages could potentially benefit from quieter vehicles and environments.</p> <p>Electric buses acquired through the scheme will have higher levels of accessibility for older passengers.</p> <p>The proposal offers the potential for a quieter and more comfortable journey on public transport with less vibration and reduced noise within the passenger cabin than traditional diesel vehicles.</p> <p>Passengers of all ages including those living in deprivation and/or suffering from social isolation will have access</p>	<p>level of accessibility. These measures offer potential positive impact for older passengers.</p> <p>Brighton &amp; Hove is becoming an Age and Dementia Friendly City, working in partnership with residents and key organisations to build a city where everyone can be supported to lead healthy and active lives.</p> <p>Brighton &amp; Hove Buses was the very first business to be accredited by Brighton &amp; Hove City Council's Age and Dementia-Friendly Business Recognition Scheme which aims to ensure businesses are more accessible and inviting to older people and people living with dementia.</p> <p>Brighton &amp; Hove Buses prioritise accessibility and have dementia friendly</p>

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	<ul style="list-style-type: none"> <li>• Blood pressure</li> <li>• Cognitive abilities</li> <li>• Inattention and hyperactivity</li> <li>• Mental health and illness</li> </ul>		<p>to a high frequency, zero emission and accessible 24/7 bus service (excluding Christmas timetable reductions) that operates 365 days a year ensuring opportunity for all passengers to access and engage in social, leisure, healthcare, work and education activities.</p> <p>No specific negative impacts related to the deployment of electric buses to replace diesel buses have been identified for this group at this time.</p>	<p>flooring on all buses and on all newer buses, dementia friendly moquette. These features will be included in the specification of new electric buses should the bid be successful.</p> <p>Brighton &amp; Hove City Council and Brighton &amp; Hove Buses continue to understand the importance of accessible buses in relation to isolation. Social interactions made on bus can help combat isolation and loneliness as well as connect people with vital services.</p> <p>Brighton &amp; Hove Buses to continue to work with and learn from local and national groups to inform accessibility best practice.</p> <p>The proposals to deploy electric vehicles on this route are designed to benefit all existing and future potential bus</p>

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				passengers whilst improving air quality and reducing carbon emissions for all residents and visitors of Brighton & Hove. On the balance of this and the above measures we anticipate this proposal to be considered a positive for people across age brackets.
<b>Disability<sup>15</sup></b>	<p>19% of people in Brighton &amp; Hove are disabled.</p> <p>19,060 (8%) of adults in the city have mental and physical disabilities.</p> <p>There are c. 7,588 disabled concessionary bus pass holders in the city</p> <p>99 in every 100,000 65+ year olds (32 people) have age-related macular degeneration, preventable sight loss, (2021/22). England (104 per 100,000)</p>	<p><b>Stakeholder Engagement</b></p> <p>In response to Zebra 2 specific stakeholder engagement, BADGE (Brighton Access for Disabled Groups Everywhere) highlighted the need for potential vehicles to be fully accessible and that potential air quality improvements could be particularly beneficial to disabled children and adults who may be at a lower height when wheeling and therefore subject to more pollutant</p>	<p><b>General Comments</b></p> <p>The number of disabled concessionary bus pass holders demonstrates the importance of an accessible, frequent, reliable and safe bus network in Brighton and Hove.</p> <p>Some adults with mental health issues and physical disabilities in the city may rely on public transport as their only means of transport.</p> <p><b><u>Potential Positive Impacts</u></b></p> <p>The protected</p>	<p>Brighton &amp; Hove Buses are a leader in accessible public transport and are still the only bus operator to have been awarded the highest accreditation level, Leader status, by the DfT as part of the Inclusive Transport Strategy.</p> <p>Brighton &amp; Hove Buses and Metrobus have a vehicle fleet that is 100% Disability Discrimination Act (DDA) compliant.</p> <p>Brighton &amp; Hove Buses have employed a dedicated accessibility team specialising in ensuring</p>



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		<p>emissions.</p> <p><b>Stakeholder Engagement</b>            In response to Zebra 2 specific stakeholder engagement, SEDSConnective (Symptomatic Hypermobility Ehlers-Danlos NeuroDivergent Syndromes in Sussex &amp; Beyond) highlighted support for initiatives to improve air quality and the need for potential vehicles to offer more room for disabled people and wheelchairs.</p>	<p>characteristic group will have access to a high frequency, zero emission and accessible 24/7 bus service (excluding Christmas timetable reductions) that operates 365 days a year ensuring opportunity for all passengers to access and engage in social, leisure, healthcare, work and education activities.</p> <p>Electric buses acquired through the scheme will have higher levels of accessibility for passengers ensuring they:</p> <p>Will be compliant with the Public Service Vehicles Accessibility Regulations 2000 (PSVAR)</p> <p>Will be compliant with the Accessible Information Regulations provide an induction loop</p>	<p>accessible travel for all. All new buses aim to go beyond the Public Service Vehicles Accessibility Regulations (PSVAR) guidance to ensure more space for all including wheelchair users and buggies.</p> <p>Brighton &amp; Hove Buses continue to work with Helping Hand, an award-winning assistance card scheme providing bus users with a way to discreetly and directly advise of any assistance required. The card can be particularly helpful for customers with non-visible disabilities.</p> <p>The disabled concessionary bus pass available in Brighton &amp; Hove offers longer daily hours of validity than other areas of England.</p>

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			<p>to aid direct communication between drivers and passengers who use a hearing aid.</p> <p>additional flexible space in addition to the mandatory wheelchair space – this space can either be suitable for a second wheelchair user or at least 2 unfolded pushchairs or prams.</p> <p>The proposal offers potential for improved air quality, reducing the risk of related health impacts including breathing difficulties.</p> <p>The proposal offers the potential for a more comfortable journey on public transport with less vibration and reduced noise within the passenger cabin than traditional diesel vehicles – this could directly benefit those passengers</p>	<p><b><u>Mitigation of Identified Potential Negative Impact</u></b></p> <p>The potential deployment of brand-new electric buses would offer the opportunity to leverage better bus specifications in line with the newest technological advancements and statutory requirements.</p> <p>Brighton &amp; Hove Buses will utilise this opportunity to consider and select vehicle specification to mitigate potential negative impacts from quieter electric buses. Namely the consideration of an appropriate simulated sound from the vehicle to alert people of the vehicle, advanced collision avoidance assistance features to aid the driver including options for digital camera wing mirrors which aid visibility. The operator will utilise experience from the deployment of other zero emission vehicles in</p>

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			<p>that are D/deaf, deafened or hard of hearing.</p> <p><b><u>Potential Negative Impacts</u></b></p> <p>The significantly quieter noise from electric vehicles presents a possible road safety risk for the visually impaired.</p> <p>The significantly quieter noise from electric vehicles presents a safety risk for blind or partially sighted people in understanding an electric bus is approaching a bus stop.</p> <p>Partially sighted and blind people will not necessarily be aware of or struggle to access information about public transport services, including routes, timetables, and fares.</p>	<p>other areas to inform best practice.</p> <p>Local Authority and Operator to continue established practice of engagement with stakeholder groups to inform and educate on the deployment of electric vehicles in the city.</p> <p>Brighton &amp; Hove Buses will continue with the current practice of ensuring timetables, information and marketing material is available on request in large print, braille and audio CD.</p> <p>All Brighton &amp; Hove Buses vehicles will continue to be 'Talking Buses' with audio and visual next stop announcements.</p> <p>Brighton &amp; Hove City Council will continue to support the 'Talking Bus</p>

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				<p>Stops' in the city which provide blind and partially sighted passengers access to real time bus information in Brighton &amp; Hove.</p> <p>Brighton &amp; Hove Buses recognise not all passengers can lift an arm or see a bus approaching in order to request the vehicle to stop and as a result all drivers at Brighton &amp; Hove Buses are trained to stop at every stop if a person is waiting.</p> <p>Brighton &amp; Hove Buses will continue with their leading staff training schemes that support passengers with disabilities. All staff, from director level to front line staff, receive disability awareness and Dementia Friend Awareness training.</p> <p>All Brighton &amp; Hove Buses staff have, through a partnership with Guide Dogs, received 'My Guide'</p>

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				<p>Level 1 sighted guide training. This training provides staff with the knowledge, skills and confidence to safely guide people with sight loss.</p> <p>The proposals to deploy electric vehicles on this route are designed to benefit all existing and future potential bus passengers whilst improving air quality and reducing carbon emissions for all residents and visitors of Brighton &amp; Hove. On the balance of this and the above measures we anticipate this proposal to be considered a positive for those that have a disability.</p>
<b>Gender reassignment<sup>16</sup></b>	At least 2,341 residents aged 16+ (1.0%) identify with a gender different from their sex registered at birth.	The Government's transgender e-survey identified respondents' most widely reported fear for their safety on the streets and when using public transport was being a victim of a violent	No specific impacts related to the deployment of electric buses to replace diesel buses have been identified for this group at this time.	While no specific impacts have been identified, the potential deployment of brand-new electric buses would offer the opportunity for the operator to leverage better bus specifications in line with the latest

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		crime or harassment.		<p>technological advancements and statutory requirements.</p> <p>The bid offers the opportunity for operator consideration and specification of the most advanced safety and security measures for passengers, such as CCTV, in line with the current high standards across existing fleet.</p> <p>Consequently there is the potential benefit of improving safety onboard public transport and the perception of safety.</p> <p>The operator also has an anti-hate campaign and commits to supporting the Police and the CPS in investigation and prosecution of Hate based crime.</p> <p>Brighton &amp; Hove Buses work closely with</p>

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				<p>Switchboard, a charity for LGBTQ people looking for community, support or information, along with many other organisations to ensure policies are working for all.</p> <p>The proposals to deploy electric vehicles on this route are designed to benefit all existing and future potential bus passengers whilst improving air quality and reducing carbon emissions for all residents and visitors of Brighton &amp; Hove. On the balance of this and the above measures we anticipate this proposal to be considered a positive for those that are proposing to undergo, have undergone or are in a process of gender reassignment.</p>
<b>Pregnancy and maternity<sup>17</sup></b>	25% of households in the city have dependent children.  Public transport plays a	People who are pregnant or have recently been pregnant may be less able or willing to shift to	<b><u>Potential Positive Impact</u></b>  The proposal offers	Encourage use of existing Bus Service Improvement Plan (BSIP) funded bus fare reductions for children

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	<p>fundamental role in supporting social inclusion for many parents with young children, and parents with young children have been identified as a group that is particularly vulnerable to social isolation.</p> <p>In a report detailing the outcomes of air pollution by Environmental Research Group of Imperial College London the health impacts from air pollution listed for the Pregnancy and birth outcomes life stage include:</p> <ul style="list-style-type: none"> <li>• Foetal development</li> <li>• Low birth weight</li> <li>• Gestational age and pre-term births</li> <li>• Miscarriage</li> <li>• Sperm count and mobility</li> </ul>	<p>sustainable modes when travelling with multiple children and/or children across multiple age groups.</p>	<p>potential for improved air quality, reducing the risk of health impacts during the pregnancy and maternity life stage as a result of air pollution.</p> <p>A large proportion of the proposed route operates in the city centre Air Quality Management Areas and therefore would potentially contribute to a reduction in air pollution in key areas of the city.</p> <p>The protected characteristic group will have access to a zero emission and accessible 24/7 bus service (excluding Christmas timetable reductions) that operates 365 days a year ensuring opportunity for all passengers to access and engage in social, leisure, healthcare, work and education activities.</p>	<p>and young people including free travel by up to four children or young people aged 19 or under when accompanied by a fare paying adult or an adult concessionary pass holder.</p> <p>Brighton &amp; Hove Buses' existing fleet and vehicles subject to this proposal would be low floor to aid boarding with buggies.</p> <p>Brighton &amp; Hove Buses offer dedicated webpage guidance for buggies on buses and offer a Helping Hand card for those with buggies that cannot be folded and therefore require assistance.</p> <p>Brighton &amp; Hove City Council and Brighton &amp; Hove Buses continue to understand the importance of accessible buses in relation to isolation. Social interactions made on bus</p>



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			<p>Electric buses acquired through the scheme will have higher levels of accessibility for passengers.</p> <p>Most significantly for this protected group would be an additional flexible space in addition to the mandatory wheelchair space – this space can either be suitable for a second wheelchair user or at least 2 unfolded pushchairs or prams which would benefit parents travelling with young children.</p> <p>No specific negative impacts related to the deployment of electric buses to replace diesel buses have been identified for this group at this time.</p>	<p>can help combat isolation and loneliness as well as connect people with vital services.</p> <p>The proposals to deploy electric vehicles on this route are designed to benefit all existing and future potential bus passengers whilst improving air quality and reducing carbon emissions for all residents of Brighton &amp; Hove.</p> <p>This combined with the additional benefit of a new flexible space on board electric buses that could ease travel for those with pushchairs we anticipate this proposal to be considered a positive by those who are pregnant or have recently been pregnant.</p>

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<b>Race/ethnicity<sup>18</sup></b> Including migrants, refugees and asylum seekers	<p>72,272 residents (26%) are from a Black or Minority Ethnic group.</p> <p>54,343 residents (20%) were born outside of the UK.</p> <p>45% of international migrants living in Brighton &amp; Hove were born in the EU.</p> <p>5.4% of households have no members with English as their main language.</p> <p>Lack of access to a car or van is highest for Black people (41%), mixed ethnicity (30%) and Asian (21%) in comparison with their white counterparts (19%). Black people are more than twice as likely not to have access to a car or van than white people.</p> <p>People from Pakistani (99.1%), Bangladeshi (98.7%), and Black African (98.2%) backgrounds are most likely to live in an urban location</p>		<p><b>General Comments</b> People from a Black and Racially Minoritised background are less likely to have access to a private vehicle and therefore will be more reliant on public transport.</p> <p>People from a Black and Racially Minoritised background are more likely to live in urban areas and therefore more likely to be impacted by exposure to air pollution.</p> <p><b><u>Potential Positive Impact</u></b> The protected characteristic group will have access to a high frequency, zero emission and accessible 24/7 bus service (excluding Christmas timetable reductions) that operates 365 days a year ensuring opportunity for all passengers to access and engage in social,</p>	<p>Highlight the languages feature through Brighton &amp; Hove City Council's website and Brighton &amp; Hove Buses' website which allows pages to be viewed in multiple languages.</p> <p>The operator has an anti-hate campaign and commits to supporting the Police and the CPS in investigation and prosecution of Hate based crime.</p> <p>Brighton &amp; Hove Buses work closely with the Racial Harassment Forum, a local multi-agency partnership that works towards tackling and reducing racist and religiously motivated incidents, along with many other organisations to ensure policies are working for all.</p> <p>Work with operators to request network and bus route maps that are clear</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
			<p>leisure, healthcare, work and education activities.</p> <p>Potential air quality improvements in urban areas, including the city centre Air Quality Management Areas.</p> <p>No specific negative impacts related to the deployment of electric buses to replace diesel buses have been identified for this group at this time.</p>	<p>and graspable regardless of language that highlight local known attraction points, possibly with images or symbols.</p> <p>Where possible work with operators to simplify fares and offers to make them easier to understand.</p> <p>The proposals to deploy electric vehicles on this route are designed to benefit all existing and future potential bus passengers whilst improving air quality and reducing carbon emissions for all residents and visitors of Brighton &amp; Hove, however it is likely the benefits could directly benefit this protected group through improved air pollution levels. As a result we anticipate this proposal to be considered a positive for this group.</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
<b>Religion or belief<sup>19</sup></b>	<p>According to the 2021 Census (ONS), over a half of residents (152,966 people, 55%) have no religion or belief.</p> <p>Safety, and perceptions of safety, are particularly important for a number of groups when using the pedestrian environment and public transport. This includes people from particular religious or faith communities, for whom concern about hate crime is a particular issue.</p>		<p><b><u>Potential Positive Impact</u></b>  Passengers with a religion or belief will have access to a high frequency, zero emission and accessible 24/7 bus service (excluding Christmas timetable reductions) that operates 365 days a year ensuring opportunity for all passengers looking to travel to places of worship, ceremonies and religious events along the proposed bus route and more generally throughout the city.</p> <p>No specific negative impacts related to the deployment of electric buses to replace diesel buses have been identified for this group at this time.</p>	<p>While no specific negative impacts have been identified, the potential deployment of brand-new electric buses would offer the opportunity for the operator to leverage better bus specifications in line with the latest technological advancements and statutory requirements.</p> <p>The bid offers the opportunity for operator consideration and specification of the most advanced safety and security measures for passengers, such as CCTV, in line with the current high standards across existing fleet. Consequently there is the potential benefit of improving safety onboard public transport and the perception of safety.</p> <p>The operator also has an anti-hate campaign and commits to supporting the</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
				<p>Police and the CPS in investigation and prosecution of Hate based crime.</p> <p>Brighton &amp; Hove Buses work closely with the Racial Harassment Forum, a local multi-agency partnership that works towards tackling and reducing racist and religiously motivated incidents, along with many other organisations to ensure policies are working for all.</p> <p>The proposals to deploy electric vehicles on this route are designed to benefit all existing and future potential bus passengers whilst improving air quality and reducing carbon emissions for all residents and visitors of Brighton &amp; Hove. On balance, considering the potential positive impact and the above measures we anticipate this proposal</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
				to be considered a positive for those with or without a religion or belief.
<b>Sex/Gender<sup>20</sup></b>	<p>The gender split of Brighton &amp; Hove's population is approximately 48.9% male, 51.1% female.</p> <p>0.35% of people aged 16 years and over identified as non-binary in Brighton and Hove.</p> <p>Less women across the UK hold a driving license compared to men (67% versus 77%).</p> <p>Women are more likely than men to live on low incomes, work part-time and undertake unpaid work in the home and the community, such as being carers for dependent relatives</p>	<p>In 2017-2018 34% of women contacted as part of research on safety and security on behalf of Transport for London (TfL) reported being very or quite worried when using public transport</p> <p>The Organisation for Economic Co-operation and Development stresses that women are far more sensitive than men to environmental issues such as climate change and air pollution in their choices of modes of travel</p>	<p><b>General Comments</b> Women are more likely to be travelling on the network and may be travelling with family members, as primary carers.</p> <p>Women and those that identify as non-binary are more likely to have concerns about personal safety and security when using public transport.</p> <p><b><u>Potential Positive Impacts</u></b> Women and non-binary people will have access to a high frequency, zero emission and accessible 24/7 bus service (excluding Christmas timetable reductions) that operates 365 days a year ensuring opportunity for all passengers to access</p>	<p>While no specific negative impacts have been identified, the potential deployment of brand-new electric buses would offer the opportunity for the operator to leverage better bus specifications in line with the latest technological advancements and statutory requirements.</p> <p>The bid offers the opportunity for operator consideration and specification of the most advanced safety and security measures for passengers, such as CCTV, in line with the current high standards across existing fleet. Consequently there is the potential benefit of improving safety onboard public transport and the perception of safety.</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
			<p>and engage in social, leisure, healthcare, work and education activities.</p> <p>Potential air quality improvements will benefit all through reduction of related health impacts and, according to the data/reports considered, are likely to be valued by women in particular.</p> <p>Most significantly for this protected group would be an additional flexible space in addition to the mandatory wheelchair space – this space can either be suitable for a second wheelchair user or at least 2 unfolded pushchairs or prams which would benefit those travelling as a primary carer to dependent relatives.</p> <p>No specific negative impacts related to the deployment of electric</p>	<p>Brighton &amp; Hove City Council continue to offer support for carers in the city including discounts on activities in Brighton &amp; Hove with a free card for carers. Holders of this card are entitled to discounted travel on Brighton &amp; Hove Buses.</p> <p>The proposals to deploy electric vehicles on this route are designed to benefit all existing and future potential bus passengers whilst improving air quality and reducing carbon emissions for all residents of Brighton &amp; Hove. On the balance of this and the measures, both existing and potential, we anticipate this proposal to be considered a positive for men, women and non-binary people.</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
			buses to replace diesel buses have been identified for this group at this time.	
<b>Sexual orientation<sup>21</sup></b>	<p>25,247 residents age 16+ (10.6%) identified as Gay or Lesbian, Bisexual or Other sexual orientation.</p> <p>The city is known for being a welcoming place for LGBTQ+ people and hosts large-scale annual events such as Pride.</p>	<p>The 2018 National LGBT survey pointed to transport as the most common place where cisgender LGB survey respondents reported avoiding being open about their sexual orientation as well as pointing to public transport as being considered an 'unsafe' space, that can be sometimes avoided altogether by this group.</p>	<p>No specific impacts related to the deployment of electric buses to replace diesel buses have been identified for this group at this time.</p>	<p>While no specific impacts have been identified, the potential deployment of brand-new electric buses would offer the opportunity for the operator to leverage better bus specifications in line with the latest technological advancements and statutory requirements.</p> <p>The bid offers the opportunity for operator consideration and specification of the most advanced safety and security measures for passengers, such as CCTV, in line with the current high standards across existing fleet. Consequently there is the potential benefit of improving safety onboard public transport and the</p>



<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
				<p>perception of safety.</p> <p>The operator also has an anti-hate campaign and commits to supporting the Police and the CPS in investigation and prosecution of Hate based crime.</p> <p>Brighton &amp; Hove Buses work closely with Switchboard, a charity for LGBTQ people looking for community, support or information, along with many other organisations to ensure policies are working for all.</p> <p>Brighton &amp; Hove Buses continue to be a key partner for Brighton Pride and other local Pride events and they have a dedicated rainbow hued livery Diversity Bus to visually demonstrate support for the LGBTQ+ community.</p> <p>The proposals to deploy</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
				electric vehicles on this route are designed to benefit all existing and future potential bus passengers whilst improving air quality and reducing carbon emissions for all residents and visitors of Brighton & Hove. On the balance of this and the above measures we anticipate this proposal to be considered a positive for those that are Gay or Lesbian, Bisexual or Other sexual orientation.
<b>Marriage and civil partnership<sup>22</sup></b>	32.8% are married or in a registered civil partnership		No specific impacts related to the deployment of electric buses to replace diesel buses have been identified for this group at this time.	While no specific impacts have been identified, the potential deployment of brand-new electric buses would offer the opportunity to leverage better bus specifications in line with the newest technological advancements and statutory requirements.  The proposals to deploy electric vehicles on the route are designed to

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
				positively benefit all existing and future potential bus passengers whilst improving air quality and reducing carbon emissions for all residents and visitors of Brighton & Hove including those who are married or in a registered civil partnership.
<b>Community Cohesion<sup>23</sup></b>	The council has a responsibility to promote good relations between people of different protected characteristic groups under the Equalities Act			Share information regarding the bid, that is not commercially sensitive, with local representative groups for wider dissemination.  Brighton & Hove City Council and the operator will continue to highlight the many initiatives listed in this document, including those related to anti-hate crime, to encourage community cohesion.
<b>Other relevant groups<sup>24</sup></b>	<b>People on low incomes and people from deprived communities.</b>  Brighton & Hove is the 131st most deprived local authority in	Bus fares are considered to be high as referenced in the Brighton & Hove City Council Bus Service Improvement Plan (BSIP) document. This is further	<b>General Comments</b> There is no evidence that changing to an electric bus fleet on the proposed route would result in changes to the cost of	Brighton & Hove City Council and the operator will continue to promote the concessionary bus passes available for older and disabled people in Brighton

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	<p>England (of 317)</p> <p>The highest concentration of deprivation is in the Whitehawk, Moulsecoomb and Hollingdean areas. Along the coast, to the west of the city and in Woodingdean there are also pockets of deprivation. All these areas are in the 20% most deprived areas in England.</p> <p>People living in deprived areas are significantly more likely to use buses than other groups of people, and bus travel therefore accounts for a larger percentage of their income</p> <p>Communities in deprived areas and from lower economic backgrounds, are found to experience twice the impact on lung function by pollutants than those from wealthier areas - and are three times more likely to develop COPD, as found by the UK Biobank in 2019</p>	<p>exacerbated by the current cost of living crisis. Disproportionately affecting low-income households.</p> <p><b>Stakeholder Engagement</b> In response to Zebra 2 specific stakeholder engagement, Brighton Area Buswatch (long established bus user group, representing Brighton and surrounding area and a local group of Bus Users UK) highlighted that zero emission buses should be a major part of reducing pollution and in encouraging more bus usage and that without funding opportunities such as ZEBRA 2, the costs of new zero emission buses would fall on operators which could lead to higher fares for passengers.</p>	<p>travel for passengers of any age.</p> <p>The proposed bus route operates through parts of Whitehawk, an area calculated to be in within the 20% most deprived areas in England.</p> <p><b><u>Potential Positive Impacts</u></b> Potential air quality improvements as a result of the scheme will benefit all through reduction of related health impacts. This potential benefit, according to the data/reports considered, is likely to benefit communities in deprived areas in particular.</p> <p>People on low incomes and those living in deprivation will have access to a high frequency, zero emission and accessible 24/7 bus service (excluding</p>	<p>&amp; Hove that offer longer daily hours of validity than other areas of England.</p> <p>Brighton &amp; Hove City Council and the operator will continue to encourage use of existing central government funded fare offers (£2 cap) and Bus Service Improvement Plan (BSIP) funded bus fare offers such as '£5 do it all in a day' plus free and discounted travel for children and young people.</p> <p>The proposals to deploy electric vehicles on the route are designed to positively benefit all existing and future potential bus passengers whilst improving air quality and reducing carbon emissions for all residents and visitors of Brighton &amp; Hove. On the balance of this and the above measures we anticipate this proposal to be considered a positive for</p>

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
			<p>Christmas timetable reductions) that operates 365 days a year ensuring opportunity for all passengers to access and engage in social, leisure, healthcare, work and education activities.</p> <p>No specific negative impacts related to the deployment of electric buses to replace diesel buses have been identified for this group at this time.</p>	those on low incomes and from deprived communities.
<b>Cumulative impact<sup>25</sup></b>	<p>37.4% of households in Brighton &amp; Hove have no car or van, higher than the 23.5% figure for England.</p> <p>Many people will have more than one or even two of the protected characteristics, meaning that people will experience a combination of challenges and opportunities at any one time.</p>	<p><b>Stakeholder Engagement</b> In response to Zebra 2 specific stakeholder engagement, both Bricycles (campaigning to make cycling accessible for everyone in the city of Brighton &amp; Hove) and Brighton Active Travel (community group) have highlighted that improvements in air quality as a result of a successful bid could</p>	<p><b>General Comments</b> The comparatively high percentage of households in Brighton &amp; Hove without a car or van demonstrates the importance and social value of public transport in the city.</p> <p><b><u>Potential Positive Impacts</u></b> The potential deployment of electric buses and the localised environmental</p>	Share information regarding the bid, that is not commercially sensitive, with local representative groups for wider dissemination.

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
		<p>benefit those wishing to travel actively (cycling, walking and wheeling).</p> <p><b>Stakeholder Engagement</b> In response to Zebra 2 specific stakeholder engagement, Brighton Business Improvement District or BID (a not-for-profit organisation formed of 517 businesses within Brighton city centre) highlighted that the scheme offers the potential to support the retail and tourism sectors in the city as the potential environmental improvements could encourage increased business patronage and dwell time in a clean and inviting city centre.</p>	<p>impacts, namely a reduction in air and noise pollution, could encourage wider decarbonisation and mode shift as active travel becomes a more appealing option.</p> <p>The potential deployment of electric buses and the localised environmental impacts could support the local economy.</p>	

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
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**Assessment of overall impacts and any further recommendations<sup>26</sup>**

The most apparent and immediate direct potential impact for this scheme would be the reduction in air pollution and carbon emissions as a result of electric buses, but specifically the deployment on the proposed route which runs through the city centre Air Quality Management Areas. This benefit and the health impacts from reduced air pollution, would apply to all groups considered in this assessment, residents and businesses along the bus route, and broader society as a whole. Through this assessment it has been identified that people from across age brackets, disabled people, people from a Black and Racially Minoritised background, women, and those from low-income households would be potentially most positively impacted by this benefit. The responses from the stakeholder groups that replied to dedicated stakeholder engagement were all in support of the scheme and the majority pointed to the potential improvements in air quality as a key direct benefit.

Another direct potential benefit of the scheme would be a reduction in noise pollution from electric buses, particularly in areas the bus route operates namely the city centre and urban areas. Interlinked with this are the benefits of improved passenger comfort for all, with passenger cabins that are quieter and less subject to vibrations associated with typical combustion engine vehicles. This benefit directly applies to passengers that are D/deaf, deafened or hard of hearing and those passengers with age or disability related health conditions.

Accessibility improvements are also a potential benefit of the scheme and the value of this was highlighted by stakeholder feedback from groups representing disabled people. The electric buses that will be acquired through the scheme will be subject to the most recent accessibility regulations that will include induction loops to aid communication for passengers with a hearing aid. The specification will also ensure a second flexible space in addition to a mandatory wheelchair space that could be used for another wheelchair user or for use by prams or pushchairs which would be particularly beneficial for disabled people, new parents, parents travelling with children and/or primary carers of dependents. Brighton & Hove Buses are already a recognised UK industry leading operator for accessibility and inclusion, with numerous projects and initiatives listed throughout this assessment that aim to facilitate and improve public transport for all. Accessibility is vital for route 7 as it is a key link to the city's main hospital's including for passengers transferring from rail services from across the wider region. The combination of existing operator best practice and new buses adhering to the latest regulations, as part of the conditions of the bid, offers a compelling package of potential benefits for people across the protected characteristic groups and society more broadly. The scheme also aligns with the vision and aims of Brighton & Hove City Council Accessible City Strategy 2023 to 2028.

One of the indirect potential benefits of the bid would be the opportunity to leverage better bus specifications in line with the latest technological advancements and statutory requirements. Through operator led consideration and specification of the most advanced safety

<b>Groups to assess</b>	<b>What do you know<sup>10</sup>?</b> Summary of data about your service-users and/or staff	<b>What do people tell you<sup>11</sup>?</b> Summary of service-user and/or staff feedback	<b>What does this mean<sup>12</sup>?</b> Impacts identified from data and feedback (actual and potential)	<b>What can you do<sup>13</sup>?</b> All potential actions to: <ul style="list-style-type: none"> <li>• advance equality of opportunity,</li> <li>• eliminate discrimination, and</li> <li>• foster good relations</li> </ul>
<p>and security measures, the bid offers the potential benefit of improving safety onboard public transport and the perception of safety which was noted as an area of concern by multiple protected characteristic groups.</p> <p>Other indirect potential benefits of the scheme highlighted by the feedback from stakeholder groups included the potential wider decarbonisation outcomes through mode shift as the environmental improvements, air and noise pollution reduction, could see active travel becoming a more attractive option. Furthermore, these potential environmental improvements could benefit the local economy with the city centre becoming a more attractive destination for residents and visitors.</p> <p>The primary potential negative impact relates to the impact of quieter electric vehicles on blind or partially sighted people due to the possible greater risk of road safety incidents and/or not identifying a bus is approaching a bus stop and therefore missing a bus. The mitigation for this covers firstly vehicle specification with the operator leveraging the most up-to-date bus specification in relation to road safety features such as a simulated vehicle sound to alert those nearby of bus proximity, advanced collision avoidance systems and digital cameras to replace wing mirrors offering the bus driver greater visibility around the vehicle. Further mitigation will include the Local Authority and Operator continued engagement with stakeholder groups to inform and educate on any potential deployment of electric vehicles in the city. Brighton &amp; Hove Buses will continue to serve every bus stop when someone is waiting along with a package of training measures for all staff to be aware of and assist with accessibility requirements.</p> <p>On balance the assessment indicates the considerable value of the bid and potential positive impacts on the protected characteristics groups and wider society. The bid has the potential to deliver a zero emission, accessible and high frequency bus service that operates 24/7 (excluding Christmas timetable reductions) 365 days a year, ensuring opportunity for all passengers to access and engage in social, leisure, healthcare, religious, work and education activities. The potential negatives aim to be mitigated, through new and existing interventions and experience. Brighton &amp; Hove Buses and partner company Metrobus benefit from considerable experience in deploying zero emission vehicles in Crawley, while the parent group Go-Ahead operate 43% of London’s zero emission bus fleet and the lessons learned and proven measures to mitigate potential negative impacts will be shared and actioned.</p> <p>The benefits of the scheme must also be considered from the wider environmental perspective. Brighton &amp; Hove City Council declared a climate and biodiversity emergency in 2018 and made a commitment as a city to become carbon neutral by 2030. If Brighton &amp; Hove is to become carbon neutral then bids such as this to potentially deliver a number of zero emission electric buses will be crucial in improving air quality, reducing carbon emissions and avoiding the potential grave impacts of climate change.</p>				



#### 4. List detailed data and/or community feedback that informed your EIA

Title (of data, research or engagement)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
<p>Stakeholder Engagement</p> <p>Brighton &amp; Hove City Council contacted over 70 stakeholder groups to detail the Zebra 2 bid and to invite comments on the possible deployment of further zero-emission electric buses in the city and any potential impacts, either positive or negative.</p> <p>Within the communication, we confirmed that as part of the bid an Equality Impact Assessment would be carried out and that the council would welcome feedback from stakeholders that represent people from protected characteristic groups.</p>	<p><b>November 2023</b></p>	<p>Over 70 stakeholder groups were contacted. From this we received 10 responses from 9 stakeholder groups.</p> <p>All responses were assessed to be in favour of the Zebra 2 bid and the possible impacts, with the potential reduction in air pollution being the key benefit highlighted in the majority of responses.</p>	<p>Local Authority and Operator to continue established practice of engagement with stakeholder groups to inform and educate on the deployment of electric vehicles in the city.</p>
<p>Joint Strategic Needs Assessment (JSNA) Executive Summary June 2022</p>	<p><b>2022</b></p>	<p><b>None identified.</b></p> <p>This document, which references data from ONS Census 2021 Subnational population projections for England: 2018-based, was used to provide age projections for the city that were not available in the Executive Summary from June 2023.</p>	
<p>Joint Strategic Needs Assessment (JSNA) Executive Summary June 2023</p>	<p><b>2023</b></p>	<p>Gap identified as per below statement on the 'People' page of the document:</p> <p>"Due to the need for the Office for National Statistics (ONS) to rebase national and local population estimates and projections following</p>	<p>Projections statements were considered from a previous Executive Summary from June 2022.</p>

		the 2021 Census there are currently no population estimates for the years 2016 to 2021 and no population projections beyond 2021”	
Blue Badge and Concessionary Travel Team Data (2023)	<b>2023</b>	<b>None identified</b> Figures correct as of 25/09/2023	
Census 2021 <ul style="list-style-type: none"> <li>• Demography and migration: Census 2021 in England and Wales</li> <li>• Disability, England and Wales: Census 2021</li> <li>• Sexual orientation and gender identity: Census 2021 in England and Wales</li> <li>• Ethnic group, national identity, language, and religion: Census 2021 in England and Wales</li> <li>• Religion, England and Wales: Census 2021</li> <li>• Population and household estimates, England and Wales: Census 2021, unrounded data</li> <li>• Gender identity, England and Wales: Census 2021</li> <li>• Housing, England and Wales: Census 2021</li> </ul>	<b>2021</b>	<b>None identified</b>	
Council Plan 2023 to 2027 – Brighton & Hove City Council	<b>2023</b>	<b>None identified</b>	

<p>Adults with multiple long-term conditions in Brighton &amp; Hove Executive Summary November 2018</p>	<p><b>2018</b></p>	<p><b>None identified</b></p>	
<p>Mott MacDonald FS13 Future of Transport - Equalities and access to opportunity FS13 Rapid evidence review (September 2020)</p> <p>Including reference to the following documents/resources:</p> <ul style="list-style-type: none"> <li>• HM Government (2011): ‘Headline findings from our transgender E-surveys’</li> <li>• Pettersson, G., (2009), ‘Priorities for the use of bus transport by disabled people, older people and parents with young children in buggies’, Association of European Transport.</li> <li>• Department for Transport (2018); Car or van ownership</li> <li>• Gov.uk (Ethnicity facts and figures’)</li> <li>• Department for Transport (2019) ‘Full car driving licence holders by age and gender’.</li> <li>• Gill, R., (2018), ‘2018 WBG Briefing: Public transport and Gender’, Women’s Budget Group</li> <li>• Future Thinking, (2018), ‘Attitudes to safety and security: annual report 2017-2018’, TfL Compliance, Policing and on-street services</li> <li>• OECD, (2020), ‘Gender and environmental statistics. OECD Publishing, Paris.</li> </ul>	<p><b>2020</b></p>	<p><b>None identified</b></p> <p>Mott MacDonald was commissioned by the Department for Transport to provide a report considering the main areas of risk and opportunity that future transport technologies and services could present for society, including people with characteristics protected under the Equality Act 2010 along with people from different socio-economic backgrounds.</p>	

<ul style="list-style-type: none"> <li>• UK Women's Budget Group on public transport and gender (2018): 'Public transport and gender briefing'</li> <li>• Air Quality News (2019): 'Air pollution has twice the impact on lung function for poorer households'</li> <li>• Government Equalities Office, (2018) 'National LGBT Survey'.</li> </ul>			
<p>Environmental Research Group, Imperial College London</p> <p>Impacts of air pollution across the life course – evidence highlight note – April 2023</p>	<b>2023</b>	<b>None identified</b>	
<p>Brighton &amp; Hove City Council Health and Adult Social Care directory page for Switchboard Charity</p> <p><a href="http://www.brighton-hove.gov.uk/adult-social-care-hub/health-and-adult-social-care-directory/switchboard">www.brighton-hove.gov.uk/adult-social-care-hub/health-and-adult-social-care-directory/switchboard</a></p> <p>Switchboard Website <a href="http://www.switchboard.org.uk">www.switchboard.org.uk</a></p>	<b>Ongoing</b>	<b>None identified</b>	
<p>Brighton &amp; Hove City Council Health and Adult Social Care directory page for the Racial Harassment Forum.</p> <p><a href="http://www.brighton-hove.gov.uk/adult-social-care-hub/health-and-adult-social-care-directory/racial-harassment-forum">www.brighton-hove.gov.uk/adult-social-care-hub/health-and-adult-social-care-directory/racial-harassment-forum</a></p>	<b>Ongoing</b>	<b>None identified</b>	
<p>Brighton &amp; Hove City Council Enhanced Partnership Plan and Scheme, January 2023</p>	<b>2023</b>	<b>None identified</b>	

Brighton & Hove Bus Service Improvement Plan, October 2021  Including reference to: Department for Transport Annual bus statistics	<b>2021</b>	<b>None identified</b>	
Local Insight profile for 'Brighton and Hove' area  Report created 18 October 2023	<b>2023</b>	<b>None identified</b>	
Brighton and Hove Local Authority 2021 Census Area Profile – Nomis Official Census and Labour Market Statistics	<b>2021</b>	<b>None identified</b>	
Brighton & Hove City Council – 2030 Carbon Neutral Programme (June 2021)	<b>2021</b>	<b>None identified</b>	
Brighton & Hove City Council 2023 Air Quality Annual Status Report	<b>2023</b>	<b>None identified</b>	
Brighton & Hove City Council Accessible City Strategy 2023 to 2028	<b>2023</b>	<b>None identified</b>	
Brighton & Hove City Council Age and Dementia Friendly business recognition scheme  <a href="http://www.brighton-hove.gov.uk/health-and-wellbeing/support-age-well/age-and-dementia-friendly-business-recognition-scheme">www.brighton-hove.gov.uk/health-and-wellbeing/support-age-well/age-and-dementia-friendly-business-recognition-scheme</a>	<b>Ongoing</b>	<b>None identified</b>	

Brighton and Hove and Metrobus Sustainability Report Sustainability Report 2021	<b>2021</b>	<b>None identified</b>	
Brighton & Hove City Council Brighton & Hove Bus Network Review 2018 (Project Centre)	<b>2018</b>	<b>None identified</b>	
Brighton & Hove City Council Brighton & Hove Bus Network Review Update 2022 (Jacobs)	<b>2022</b>	<b>None identified</b>	
Department for Transport The Inclusive Transport Strategy: Achieving Equal Access for Disabled People July 2018  Brighton & Hove Buses and Metrobus are a Case Study on page 40.	<b>2018</b>	<b>None identified</b>	
Department for Transport Inclusive Transport Leaders Scheme: accredited bodies	<b>2023</b>	List of transport organisations that have been awarded accreditation as part of the Inclusive Transport Leaders Scheme.  The Inclusive Transport Leaders Scheme is a voluntary scheme that recognises operators who have taken steps to become leaders in inclusive and accessible travel.  Last updated 17 August 2023	
Brighton & Hove Buses Website Including dedicated pages on accessibility and hate crime.  www.buses.co.uk	<b>Ongoing</b>	<b>None identified</b>	

<a href="http://www.buses.co.uk/accessibility">www.buses.co.uk/accessibility</a> <a href="http://www.buses.co.uk/about-us">www.buses.co.uk/about-us</a> <a href="http://www.buses.co.uk/reportit">www.buses.co.uk/reportit</a> <a href="http://www.buses.co.uk/creating-britains-first-talking-city-brighton-hove">www.buses.co.uk/creating-britains-first-talking-city-brighton-hove</a> <a href="http://www.buses.co.uk/grace-eyre">www.buses.co.uk/grace-eyre</a> <a href="http://www.buses.co.uk/information-blind-partially-sighted-passengers">www.buses.co.uk/information-blind-partially-sighted-passengers</a>			
Victoria Garcia Accessibility and Communities Manager Brighton & Hove Buses and Metrobus  Contributed information related to relevant projects and initiatives carried out by Brighton & Hove Buses and Metrobus.	<b>Ongoing</b>	<b>None identified</b>	
Go-Ahead UK Website  <a href="http://www.go-ahead.com/who-we-are/uk-bus">www.go-ahead.com/who-we-are/uk-bus</a>	<b>Ongoing</b>	<b>None identified</b>	
Department for Transport Transport accessibility and disability  Case Study Brighton and Hove Buses has employed an Accessibility and Communities Manager Published February 2020  <a href="http://www.gov.uk/government/case-studies/brighton-and-hove-buses-has-employed-an-accessibility-and-communities-manager">www.gov.uk/government/case-studies/brighton-and-hove-buses-has-employed-an-accessibility-and-communities-manager</a>	<b>2020</b>	<b>None identified</b>	
Apply for zero emission bus funding (Zebra 2) Guidance Published 8 <sup>th</sup> September 2023  <a href="http://www.gov.uk/government/publications/apply-for-zero-emission-bus-funding-zebra-2">www.gov.uk/government/publications/apply-for-zero-emission-bus-funding-zebra-</a>	<b>Ongoing</b>	<b>None identified</b>	

2/apply-for-zero-emission-bus-funding-zebra-2			
Department for Transport Bus Back Better: national bus strategy for England  Published 15 March 2021	<b>2021</b>	<b>None identified</b>	
Department for Digital, Culture, Media and Sport A connected society. A strategy for tackling loneliness Published October 2018	<b>2018</b>	<b>None identified</b>	



## 5. Prioritised Action Plan<sup>27</sup>

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.				
<b>All</b>	Brighton & Hove City Council and the operator will continue to encourage use of existing central government funded fare offers (£2 cap) and Bus Service Improvement Plan (BSIP) funded bus fare offers such as '£5 do it all in a day' plus free and discounted travel for children and young people.	Public Transport remains an affordable means of transport, particularly for those on low incomes and people from deprived communities	Patronage growth and Customer Satisfaction scores in line with Bus Service Improvement Plan targets.	Ongoing
<b>Age, Disability</b>	<p>The local authority and the operator will continue to encourage use of concessionary bus passes for older and disabled people.</p> <p>The concessionary bus passes available in Brighton &amp; Hove offer longer daily hours of validity than other areas of England.</p>	Public Transport remains an accessible means of transport for those that are eligible for the older person's or disabled person's concessionary bus passes.	Patronage growth and Customer Satisfaction scores specific to concessionary pass holders. This is a specific passenger group that has struggled to recover following the pandemic.	Ongoing

<b>All</b>	Local Authority and Operator to continue established practice of engagement with stakeholder groups to inform and educate on the deployment of electric vehicles in the city.	Groups are aware of changes and can plan accordingly and information can be disseminated widely.	Fewer negative impacts / complaints about potential scheme from specific groups	Duration of the bid, implementation and deployment periods (subject to successful bid)
<b>All, but particularly Disability</b>	Brighton & Hove Buses will utilise this opportunity to consider and select vehicle specification to mitigate potential negative impacts from quieter electric buses. Namely the consideration of an appropriate simulated sound from the vehicle(s) to alert people of the vehicle(s), advanced collision avoidance assistance features to aid the driver including options for digital camera wing mirrors which aid visibility. The operator will utilise experience from the deployment of other zero emission vehicles in other areas to inform best practice.	Vehicles acquired as a result of the scheme will be in line with latest standards and potential risk areas will be mitigated.	Fewer negative impacts / complaints about potential scheme from stakeholder groups and passengers	Duration of the bid / Vehicle Specification
<b>All, but particularly Age, Disability, Sex/Gender, Pregnancy and Maternity</b>	The operator, as per the requirement of the bid, will specify the new electric buses to have an	Vehicles acquired as a result of the scheme will be in line with the latest accessibility standards.	Fewer negative impacts / complaints about potential scheme from stakeholder groups and	Duration of the bid / Vehicle Specification and then Ongoing

	<p>enhanced level of accessibility including:</p> <ul style="list-style-type: none"> <li>• compliant with the Public Service Vehicles Accessibility Regulations 2000 (PSVAR)</li> <li>• Will be compliant with the Accessible Information Regulations</li> <li>• provide an induction loop to aid direct communication between drivers and passengers who use a hearing aid</li> <li>• additional flexible space in addition to the mandatory wheelchair space – this space can either be suitable for a second wheelchair user or at least 2 unfolded pushchairs or prams.</li> </ul>		<p>passengers</p> <p>Patronage growth and Customer Satisfaction scores in line with Bus Service Improvement Plan targets.</p>	
<b>All</b>	<p>The potential deployment of brand-new electric buses would offer the opportunity for the operator to leverage better bus specifications in line with the latest technological advancements and</p>	<p>Potential bus users are more likely to try buses as a mode of transport if they are perceived to be safe.</p> <p>Existing bus users feel a sense of safety while travelling onboard buses.</p>	<p>Patronage growth and Customer Satisfaction scores in line with Bus Service Improvement Plan (BSIP) targets.</p>	<p>Ongoing</p>

	<p>statutory requirements.</p> <p>Through the operator's consideration and specification of the most advanced safety and security measures for passengers, such as CCTV, the bid offers the potential benefit of improving safety onboard public transport and the perception of safety.</p>			
<b>Age, Disability</b>	<p>Dementia friendly flooring and dementia friendly moquette will be features included in the specification by Brighton &amp; Hove Buses for new electric buses should the bid be successful.</p>	<p>Public Transport, and specifically the electric buses subject to a successful bid, remains an accessible form of transport for those with dementia.</p>	<p>Patronage growth and Customer Satisfaction scores in line with Bus Service Improvement Plan (BSIP) targets.</p>	<p>Ongoing</p>
<b>All</b>	<p>Brighton &amp; Hove Buses will continue to work with and learn from local and national groups to inform accessibility best practice.</p>	<p>Buses remain an accessible and inclusive form of transport for all passengers.</p>	<p>Patronage growth and Customer Satisfaction scores in line with Bus Service Improvement Plan (BSIP) targets.</p>	<p>Ongoing</p>

**EIA sign-off:** (for the EIA to be final an email must sent from the relevant people agreeing it or this section must be signed)

**Staff member completing Equality Impact Assessment:**

Paul Mansbridge, Public Transport Project Officer

**Date: 23/11/2023**

**Directorate Management Team rep or Head of Service/Commissioning:**  
and Engineering

Andrew Westwood, Interim Head of Transport Projects

**Date:23/11/2023**

**CCG or BHCC Equality lead:**

**Date:**

## Guidance end-notes

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<sup>1</sup> The following principles, drawn from case law, explain what we must do to fulfil our duties under the Equality Act:

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately in their work.
- **Timeliness:** the duty applies at the time of considering policy options and/or before a final decision is taken – not afterwards.
- **Real Consideration:** the duty must be an integral and rigorous part of your decision-making and influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.
- **No delegation:** the council is responsible for ensuring that any contracted services which provide services on our behalf can comply with the duty, are required in contracts to comply with it, and do comply in practice. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty. It applies when a policy is developed/agreed, and when it is implemented/reviewed.
- **Proper Record Keeping:** to show that we have fulfilled our duties we must keep records of the process and the impacts identified.

NB: Filling out this EIA in itself does not meet the requirements of the equality duty. All the requirements above must be fulfilled or the EIA (and any decision based on it) may be open to challenge. Properly used, an EIA can be a tool to help us comply with our equality duty and as a record that to demonstrate that we have done so.

### <sup>2</sup> Our duties in the Equality Act 2010

As a public sector organisation, we have a legal duty (under the Equality Act 2010) to show that we have identified and considered the impact and potential impact of our activities on all people in relation to their ‘protected characteristics’ (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership).

This applies to policies, services (including commissioned services), and our employees. The level of detail of this consideration will depend on what you are assessing, who it might affect, those groups’ vulnerability, and how serious any potential impacts might be. We use this EIA template to complete this process and evidence our consideration.

**The following are the duties in the Act. You must give ‘due regard’ (pay conscious attention) to the need to:**

- **avoid, reduce or minimise negative impact** (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
- **advance equality of opportunity.** This means the need to:
  - Remove or minimise disadvantages suffered by people due to their protected characteristics
  - Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
  - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low
  - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- **foster good relations between people who share a protected characteristic and those who do not.** This means:
  - Tackle prejudice

- 
- Promote understanding

<sup>3</sup> EIAs are always proportionate to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The numbers of people affected
- The size of the likely impact
- The vulnerability of the people affected within the context

The greater the impacts, the more thorough and demanding the process required by the Act will be.

<sup>4</sup> **When to complete an EIA:**

- When planning or developing a new service, policy or strategy
- When reviewing an existing service, policy or strategy
- When ending or substantially changing a service, policy or strategy
- When there is an important change in the service, policy or strategy, or in the city (eg: a change in population), or at a national level (eg: a change of legislation)

Assessment of equality impact can be evidenced as part of the process of reviewing or needs assessment or strategy development or consultation or planning. It does not have to be on this template, but must be documented. Wherever possible, build the EIA into your usual planning/review processes.

**Do you need to complete an EIA?** Consider:

- Is the policy, decision or service likely to be relevant to a specific group or groups (eg: older people)?
- How many people is it likely to affect?
- How significant are its impacts?
- Does it relate to an area where there are known inequalities?
- How vulnerable are the people (potentially) affected?

If there are potential impacts on people but you decide not to complete an EIA it is usually sensible to document why.

<sup>5</sup> **Title of EIA:** This should clearly explain what service / policy / strategy / change you are assessing

<sup>6</sup> **ID no:** The unique reference for this EIA. If in doubt contact your CCG or BHCC equality lead (see page 1)

<sup>7</sup> **Team/Department:** Main team responsible for the policy, practice, service or function being assessed

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<sup>8</sup> **Focus of EIA:** A member of the public should have a good understanding of the policy or service and any proposals after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Assessment (EIA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the policy, practice, service or function?
- Who implements, carries out or delivers the policy, practice, service or function? Please state where this is more than one person/team/body and where other organisations deliver under procurement or partnership arrangements.
- How does it fit with other services?
- Who is affected by the policy, practice, service or function, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? Eg: what do you want to provide, what changes or improvements, and what should the benefits be?
- What do existing or previous inspections of the policy, practice, service or function tell you?
- What is the reason for the proposal or change (financial, service, legal etc)? The Act requires us to make these clear.

<sup>9</sup> **Previous actions:** If there is no previous EIA or this assessment is of a new service, then simply write 'not applicable'.

<sup>10</sup> **Data:** Make sure you have enough data to inform your EIA.

- What data relevant to the impact on specific groups of the policy/decision/service is available?<sup>10</sup>
- What further evidence is needed and how can you get it? (Eg: further research or engagement with the affected groups).
- What do you already know about needs, access and outcomes? Focus on each of the groups identified above in turn. Eg: who uses the service? Who doesn't and why? Are there differences in outcomes? Why?
- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
- Does data/monitoring show that any policies or practices create particular problems or difficulties for any groups?
- Do any equality objectives already exist? What is current performance like against them?
- Is the service having a positive or negative effect on particular people in the community, or particular groups or communities?
- Use local sources of data (eg: JSNA: <http://www.bhconnected.org.uk/content/needs-assessments> and Community Insight: <http://brighton-hove.communityinsight.org/#> ) and national ones where they are relevant.

<sup>11</sup> **Engagement:** You must engage appropriately with those likely to be affected to fulfil the equality duty.

- What do people tell you about the services?
- Are there patterns or differences in what people from different groups tell you?
- What information or data will you need from communities?
- How should people be consulted? Consider:
  - (a) consult when proposals are still at a formative stage;



- 
- (b) explain what is proposed and why, to allow intelligent consideration and response;
  - (c) allow enough time for consultation;
  - (d) make sure what people tell you is properly considered in the final decision.
- Try to consult in ways that ensure all perspectives can be considered.
  - Identify any gaps in who has been consulted and identify ways to address this.

<sup>12</sup> Your EIA must get to grips fully and properly with actual and potential impacts.

- The equality duty does not stop decisions or changes, but means we must conscientiously and deliberately confront the anticipated impacts on people.
- Be realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific so decision-makers have a concrete sense of potential effects. Instead of "the policy is likely to disadvantage older women", say how many or what percentage are likely to be affected, how, and to what extent.
- Questions to ask when assessing impacts depend on the context. Examples:
  - Are one or more groups affected differently and/or disadvantaged? How, and to what extent?
  - Is there evidence of higher/lower uptake among different groups? Which, and to what extent?
  - If there are likely to be different impacts on different groups, is that consistent with the overall objective?
  - If there is negative differential impact, how can you minimise that while taking into account your overall aims
  - Do the effects amount to unlawful discrimination? If so the plan must be modified.
  - Does the proposal advance equality of opportunity and/or foster good relations? If not, could it?

<sup>13</sup> Consider all three aims of the Act: removing barriers, and also identifying positive actions we can take.

- Where you have identified impacts you must state what actions will be taken to remove, reduce or avoid any negative impacts and maximise any positive impacts or advance equality of opportunity.
- Be specific and detailed and explain how far these actions are expected to improve the negative impacts.
- If mitigating measures are contemplated, explain clearly what the measures are, and the extent to which they can be expected to reduce / remove the adverse effects identified.
- An EIA which has attempted to airbrush the facts is an EIA that is vulnerable to challenge.

<sup>14</sup> **Age:** People of all ages

<sup>15</sup> **Disability:** A person is disabled if they have 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. The definition includes: sensory impairments, impairments with fluctuating or recurring effects, progressive, organ specific, developmental, learning difficulties, mental health conditions and mental illnesses, produced by injury to the body or brain. Persons with cancer, multiple sclerosis or HIV infection are all now deemed to be disabled persons from the point of diagnosis.

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<sup>16</sup> **Gender Reassignment:** A transgender person is someone who proposes to, starts or has completed a process to change their gender. A person does not need to be under medical supervision to be protected

<sup>17</sup> **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

<sup>18</sup> **Race/Ethnicity:** This includes ethnic or national origins, colour or nationality, and includes refugees and migrants, and Gypsies and Travellers. Refugees and migrants means people whose intention is to stay in the UK for at least twelve months (excluding visitors, short term students or tourists). This definition includes asylum seekers; voluntary and involuntary migrants; people who are undocumented; and the children of migrants, even if they were born in the UK.

<sup>19</sup> **Religion and Belief:** Religion includes any religion with a clear structure and belief system. Belief means any religious or philosophical belief. The Act also covers lack of religion or belief.

<sup>20</sup> **Sex/Gender:** Both men and women are covered under the Act.

<sup>21</sup> **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

<sup>22</sup> **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.

<sup>23</sup> **Community Cohesion:** What must happen in all communities to enable different groups of people to get on well together.

<sup>24</sup> **Other relevant groups:** eg: Carers, people experiencing domestic and/or sexual violence, substance misusers, homeless people, looked after children, ex-armed forces personnel, people on the Autistic spectrum etc

<sup>25</sup> **Cumulative Impact:** This is an impact that appears when you consider services or activities together. A change or activity in one area may create an impact somewhere else

<sup>26</sup> **Assessment of overall impacts and any further recommendations**

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Explain what positive impacts will result from the actions and how you can make the most of these.
- Countervailing considerations: These may include the reasons behind the formulation of the policy, the benefits it is expected to deliver, budget reductions, the need to avert a graver crisis by introducing a policy now and not later, and so on. The weight of these factors in favour of implementing the policy must then be measured against the weight of any evidence as to the potential negative equality impacts of the policy.
- Are there any further recommendations? Is further engagement needed? Is more research or monitoring needed? Does there need to be a change in the proposal itself?

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<sup>27</sup> **Action Planning:** The Equality Duty is an ongoing duty: policies must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further equality assessment and consultation are needed.

