

Appendix E



Equality Impact Assessment (EIA)

Name of Policy or Practice	Review of School Crossing Patrol Provision		
Head of Service responsible for the Policy or Practice	Andrew Wilkinson		
Name of officer (s) completing impact assessment form	Victor Turner		
Service	ERF	Date of Assessment	30/12/16

EIA Completed by :		EIA Agreed by Head of Service :	
Date	30/12/16	Date	03/01/17
Name(s)	Victor Turner	Name	Andrew Wilkinson
Signature(s)		Signature	

STEP 1 – Identify the Main Aims and Objectives of the Policy or Practice

1. What is being assessed? *(Please double click on the box and select ‘checked’ as appropriate to cross X)*

- New and revised policies or practices
- New procedures (which modify service delivery or employment practices)
- Service review or re-organisation proposals which affect the community and/or staff
- Efficiency or saving proposals
- Setting budget allocations for new financial year
- Decisions affecting service users, employees or the wider community
- New project proposals affecting staff, communities or accessibility to the built environment, eg, new construction work or adaptations to existing buildings
- Other please explain in the box below :

2. What are the overall aims and objectives of the policy or practice ?

To review the School Crossing Patrol Service in order to deliver a consistent approach which is based on objective evidence in accordance with national guidelines.

3. Who is the policy or practice intended to help or benefit (stakeholders) ?

Council Tax Payers through efficient and well managed services.

4. Who are the main consultative groups or communities of interest ?

Local Councillors
Schools benefitting from the School Crossing Patrol service.
Parents and children benefitting from the School Crossing Patrol service.

STEP 2 - Consider Existing Information and What This Tells You

When completing this section, you need to consider if you have sufficient information with which to complete your EIA, or whether you need to undertake a period of engagement/consultation before continuing. The legislation relating to the EIA process requires you to **engage and involve people who represent the interests of those who share one or more of the protected characteristics and with those who have an interest in the way you carry out your functions**. This needs to be proportionate to the policy or practice being Equality Impact Assessed. You may have already recently undertaken consultation specifically on this policy or practice. Other officers within CCBC may have carried out engagement work which will be relevant to this EIA and you can review the Community Involvement Database to find out what engagement activities have taken place in Conwy and establish if this is relevant. If you have very little or no information from previous engagement that is relevant to this EIA, you should consider undertaking some engagement work with your stakeholders and with relevant representative groups to ensure that you do not unwittingly overlook the needs of each protected group.

5. What do you already know about the impact on each protected characteristic from your experience of current service delivery or previous engagement or consultation? You could refer to the Initial Equality Impact Assessment Screening Form and the Community Involvement Database.

Protected Group	Relevance of the policy / practice by protected characteristic
Race	The 2011 census data indicates that the only areas that have a slightly higher percentage (from the County average) of people who do not consider themselves to be White British in ethnicity are Betws Y Coed, Colwyn Bay, Llandudno and Rhos On Sea. Whilst the review includes School Crossing Patrols in Llandudno, the service is provided based on pedestrian and vehicle numbers and site characteristics in accordance with national guidelines. There is no evidence to suggest that any racial group derives more benefit or makes more use of the service than others. Therefore, it is not considered that the review will have a significant differential impact on people from different racial groups.
Disability	The 2011 census data indicates that the only areas that have a slightly higher percentage (from the County average) of people whose day to day activities are limited due to poor health or disability are

	<p>Abergele, Llandudno, Rhos On Sea and Towyn and Kinmel Bay. Whilst the review includes School Crossing Patrols in Abergele and Llandudno, the service is provided based on pedestrian and vehicle numbers and site characteristics in accordance with national guidelines. There is no evidence to suggest that persons with a disability derive more benefit or make more use of the service than others. Therefore, it is not considered that the review will have a significant differential impact on people with a disability.</p>
Sex	<p>Although the 2011 census data indicates that there is a slightly higher percentage of women in the County than men and that there are slight fluctuations in this across the County, this is not considered significant enough to suggest that the review will have a significant differential impact in this regard.</p>
Age	<p>There is a perception that School Crossing Patrol staff are generally of an older age, so it could be perceived that the review will have a differential impact on the employment of older people. However, the Council's recruitment process ensures that there is no bias towards people of different ages and people of varied ages are currently employed as School Crossing Patrols.</p> <p>Whilst the service is provided based on pedestrian and vehicle numbers and site characteristics in accordance with national guidelines and is not a service from which all children benefit, as the service is targetted towards primary school aged children, the review will have a differential impact on people based on their age at the current sites where a SCP is provided.</p>
Religion & Belief	<p>13 (24%) of the 54 primary schools in the County Borough are designated faith schools. 6 (26%) of the 23 schools which benefit from a SCP are faith schools. Whilst the review includes a slightly higher proportion of School Crossing Patrols that serve faith based schools, the service is provided based on pedestrian and vehicle numbers and site characteristics in accordance with national guidelines. Therefore, it is not considered that the review will have a significant differential impact on people with a particular religion or faith.</p>
Sexual Orientation	<p>There is no evidence to suggest that persons with different sexual orientations derive more benefit or make more use of the service than others. Therefore, it is not considered that the review will have a significant differential impact in this regard.</p>

Gender Reassignment	There is no evidence to suggest that persons who have undergone gender reassignment derive more benefit or make more use of the service than others. Therefore, it is not considered that the review will have a significant differential impact in this regard.
Marriage & Civil Partnership	There is no evidence to suggest that persons who are married or in a civil partnership derive more benefit or make more use of the service than others. Therefore, it is not considered that the review will have a significant differential impact in this regard.
Pregnancy & Maternity	There is no evidence to suggest that pregnant women derive more benefit or make more use of the service than others. Therefore, it is not considered that the review will have a significant differential impact in this regard.
Welsh Language	20 (37%) of the 54 primary schools are Welsh medium schools. 9 (39%) of the 23 schools which benefit from a SCP are Welsh medium schools. Whilst the review includes a slightly higher proportion of School Crossing Patrols that serve Welsh medium schools, the service is provided based on pedestrian and vehicle numbers and site characteristics in accordance with national guidelines. Therefore, it is not considered that the review will have a significant differential impact on people who choose to educate their children through the medium of Welsh.
Other (please state)	

6. Summarise the additional relevant data, research and performance management information you already have:

Data / Information	Examples
Census data Data on schools. SCP site usage data SCP site vehicle data SCP site characteristics Local Councillor feedback	Initial EIA Screening Complaints Compliments Service User data Service User Feedback Inspections or Audits
Research or Comparative Information	Examples
Census data Reviews and Savings proposals relating to SCP provision undertaken by other North Wales Authorities (Anglesey and Wrexham)	Service User Surveys Studies by Government departments or professional bodies Census data Service based projects and research How Fair Is Wales (EHRC data)

7. Have you complied with the duty to Engage as described at the start of this section and are you sufficiently informed to proceed?

Yes No **(please cross as appropriate X)** If Yes, please proceed to Step 3

If No, you may wish to consider pausing at this point while you undertake engagement activities (which you should add to your action plan – Step 6). Please incorporate any information you have obtained from this additional activity in the box below and state what the key findings were :

The proposals are to:

1. Retain the 5 of the existing 32 School Crossing Patrol sites that meet the criteria set out in the School Crossing Patrol Service Guidelines (September 2016).
2. Disestablish from April 2017 the 10 School Crossing Patrol sites that do not currently meet these criteria and are currently vacant - There are no detrimental impacts associated with this proposal as the sites have not been operated for some considerable time.
3. Review again the School Crossing Patrol sites that do not currently meet these criteria when they become vacant. As the demographics of each school change on an annual basis, it is not considered appropriate to consult and engage with schools and service users until a change is imminent.
4. Review the School Crossing Patrol sites that serve new or amalgamated schools at a future date based on the criteria. As the demographics of each school change on an annual basis, it is not considered appropriate to consult and engage with schools and service users until a change is imminent.

Therefore, whilst it is acknowledged that further engagement is required, this will be undertaken at the appropriate time and will not impact on the recommendations proposed by the review, as these incorporate the need for further assessment and consultation.

STEP 3 - Procurement and Partnerships

The public sector General Duty means all public authorities need to consider the needs of different groups when designing and delivering public services. This duty also applies to private sector organisations who deliver a public function on our behalf and we need to ensure that those organisations exercise those functions by ensuring our procurement and monitoring of those services complies with the General Duty.

8. Is this policy or practice to be carried out wholly or partly by contractors or in partnership with another organisation(s)?

Yes No *(please cross as appropriate X)* If No, please proceed to Step 4

9. If yes, how will you comply with Equality, Human Rights and Welsh Language Legislation? Think about :

Procurement

- Setting out clear equality expectations in Tendering and Specification documentation
- On what you based your decisions in the award process
- That contract clauses cover legislative equality requirements
- Performance and Monitoring measures are included to monitor compliance

Partnerships

Who is responsible for :

- Equality Monitoring relevant data
- Equality Impact Assessment
- Delivering the actions from the EIA
- Ensuring that equality, human rights and Welsh Language legislation is complied with by all partners

STEP 4 - Assessing the Impact

10. Is there any evidence of higher or lower take-up or satisfaction by any group(s), and if so, how is this explained?

The service is exclusively provided for children accompanied by parents as an aid to crossing the road on their journey to school.

The review, which is based on national guidelines assesses the usage and need for SCP provision based on pedestrian and vehicle numbers and site characteristics. These vary for different sites and the results of the review are based on this data and the guidelines on whether a SCP is justified. Only those sites with low pedestrian and vehicle usage and insufficient site characteristics to justify a SCP will be disestablished.

11. Does the geography or demography of any groups reveal anything?

The service is exclusively provided for children accompanied by parents as an aid to crossing the road on their journey to school and therefore the review has the potential to be perceived as having a differential impact on younger people.

The review, which is based on national guidelines assesses the usage and need for SCP provision based on pedestrian and vehicle numbers and site characteristics. These vary for different sites and the results of the review are based on this data and the guidelines on whether a SCP is justified. Only those sites with low pedestrian and vehicle usage and insufficient site characteristics to justify a SCP will be disestablished.

12. Do any rules or requirements or the way the policy or practice is delivered prevent or reduce the likelihood of any groups from use or access or are any other barriers created for them?

Eg: due to limited income, location, times of availability, access to buildings, information or language, eligibility rules, dress code, cultural issues

The School Crossing Patrol Guidelines provide a method of assessment with which to determine which SCP sites are justified in terms of pedestrian usage, vehicle volumes and site characteristics. These provide a means of determining whether an SCP site should be provided or not. Nothing in these guidelines is designed or likely to preclude the use of justified SCP provision from any groups.

13. Can any of these limitations be justified on the grounds of advancing equality of opportunity or fostering good relations between those who share a protected characteristic and those who do not?

Not applicable

14. Do any of these limitations amount to unlawful discrimination?

Yes No Not Sure
(please cross as appropriate X)

If you answered Yes or Not Sure, please state on the table below, which protected group(s) it applies to and if possible explain why (including likely impact or effects of this proposed change):

Race	Black Minority Ethnic groups Gypsies / Travellers Language
Disability	Mobility Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities
Sex	Men Women
Age	Older People Children Young People
Religion & Belief	Faith communities
Sexual Orientation	Gay Lesbian Bi-sexual Heterosexual
Gender Reassignment	A person who proposes to, starts or has changed his or her gender

Marriage & Civil Partnership	
Pregnancy & Maternity	
Human Rights	Right to Education, Private and Family Life, Protection of property, etc
Welsh Speaking Communities	
Other socially excluded groups or communities (please state)	

15. If you answered No to Question 14, do the barriers and limitations amount to a differential impact for certain groups?

Yes No Not Sure
(please cross as appropriate X)

16. If you answered Yes or Not Sure to Question 15, please give details in the box below and explain why

The review will potentially reduce the number of SCP sites provided, which will have a differential impact on younger people at those sites.

17. Do you have enough information to make an informed judgement?

Yes No **(please cross as appropriate X)**

If you answered Yes, please justify:

If you answered No, what information do you require about protected groups?

At those SCP sites which are active, the way in which users will be impacted, their views on this impact and any ways in which it can be further mitigated beyond the mitigation measures already in place or proposed will be sought at the appropriate time.

18. Is it possible to get the information needed quickly and easily, or should data collection be included in the action plan? Please give details below:

As the demographics of each school change on an annual basis, it is not considered appropriate to consult and engage with schools and service users until a change is imminent. Further data collection and engagement will be included in the action plan.

STEP 5 – Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice

In this section, you will consider whether there are any measures to reduce or remove any adverse impact. You should also explore other ways of achieving the same goal and / or alternative means of delivering a service to meet the needs of different groups.

19. What measures can you introduce to the policy or practice which could reduce or remove any unlawful impact or disadvantage?

No unlawful impact is anticipated.

However, Kerbcraft training has been increased from a 60% to 100% offer in primary schools over the last 2 years, with many of those new schools receiving the training being those where the review will potentially remove SCP provision.

Many of the locations for which the short term disestablishment of the SCP site is proposed either already have alternative interventions, will have reduced speed limits imposed or have actual speeds which do not warrant a limit as below:

The Rhuddlan Road / Llwyn Morfa site serving the primary schools in Abergele has a zebra crossing.

The Watling Street / Denbigh Road site serving Ysgol Bro Gwydyr in Llanrwst has a zebra crossing.

The Maesdu Road / Cwm Road site serving Ysgol Morfa Rhianedd in Llandudno will have a 20mph limit imposed.

The Village Road / Penmanemawr Road serving Ysgol Pant Y Rhedyn in Llanfairfechan already has a pedestrian phase on the traffic signalised crossroads.

The Ffordd Tan Yr Ysgol / Denbigh Street site serving Ysgol Bro Gwydyr in Llanrwst has existing speeds lower than 18mph

The Ffordd Tan Yr Ysgol / Nebo Road / A470 site in Llanrwst has a pelican crossing and speeds lower than 18mph on the side road.

The school entrance site in Ysbyty Ifan will have a 20mph limit imposed.

Of those 14 sites that will be reviewed again when they become vacant:

1 in Llanddulas has a zebra crossing and will have a 20mph limit imposed.

3 in Llandudno and 1 in Llanfairfechan will have 20mph speed limits imposed.

1 in Llanfairfechan will have interactive speed indicators signs introduced.

1 in Penmachno will have a road narrowing and “Araf/Slow” markings introduced.

2 in Glan Conwy and Penmaenmawr have existing speeds lower than 18mph.

20. What measures could be included to strengthen the policy/practice and foster good relations and advance equality of opportunity?

Further consultation when the sites are reviewed again when the posts serving them become vacant in order to inform any decisions taken at that time.

21. What actions could you take to achieve the same goal by an alternative means?

None.

STEP 6 – Action Plan

Please outline below the actions you will take to progress your proposal. These might involve carrying out additional Engagement/Involvement activities, collecting Equality data where this was not readily available to help with this EIA, undertake data analysis from future data obtained to monitor the impact of this policy/practice on an ongoing basis, any actions you need to take to ensure procurement complies with the General Duty, any arrangements you need to put in place to monitor and review the impact of this policy/practice in future, and so on.

Action	Measure of Success	Timeframe	Lead Responsibility	Add to Service Plan (✓)
Actions to be taken before EIA and policy/practice can be signed off				
Wider consultation with members as part of the democratic process		February / March 2017	Victor Turner	
Actions after EIA and policy/practice signed off				
Consult with impacted schools	Consultation	When SCP post becomes vacancy at each school	Victor Turner	
Consult with parents and children at impacted schools	Consultation	When each SCP post becomes vacant	Victor Turner	

STEP 7 – Decision To Proceed

22. Using the information you have gathered in steps 1 – 5 above, please state on the table below whether you are able to proceed with the policy or practice and if so, on what basis?

(please cross as appropriate X)

Decision		Action
<input checked="" type="checkbox"/> Yes	Continue with policy or practice in its current form	Complete the Monitoring and Review section (Step 8) to ensure the outcomes are monitored and regularly reviewed
<input type="checkbox"/> Yes	Continue with policy or practice but with amendments for improvement	Complete Action Plan and Monitor and Review sections (Steps 6 & 8) to continually assess impact
<input type="checkbox"/> Yes	Continue with policy or practice but with amendments to remove any areas of adverse impact as identified in Step 5	Complete Action Plan (Step 6) to address any areas of adverse impact and Monitor and Review (Section 8) to continually assess impact
<input type="checkbox"/> No	Abandon this policy or practice as it is not possible to address the adverse impact, and consider alternative ways of addressing the issues	Complete Action Plan to address any issues resulting from abandoning policy and to deal with the adverse impact identified

STEP 8 – Arrangements for Monitoring Outcomes and Reviewing Data

The EIA process is an ongoing one that doesn't end when the policy/practice and EIA is agreed and implemented. There is a specific legal duty to monitor the impact of policies/practices on equality on an ongoing basis to identify if the outcomes have changed since you introduced this new policy or practice.

23. Please outline below what arrangements you will make to monitor and review the ongoing impact of this policy or practice :

Monitoring and Review arrangements (including where outcomes will be recorded)	Timeframe & Frequency	Lead Responsibility	Add to Service Plan (✓)
Monitor pedestrian and vehicle numbers at each site	2 years after any change is implemented	Victor Turner	
Monitor accident data for any adverse impact on road safety	Ongoing	Victor Turner	

STEP 9 – Publishing the Equality Impact Assessment

Please arrange for this completed EIA to be agreed by your Head of Service, refer to the EIA Policy regarding publishing arrangements and return a copy to the HR and Equality Officer.