

# Croydon Council

## Equality Analysis Form

### Stage 1 Initial Risk Assessment - Decide whether a full equality analysis is needed

At this stage, you will review existing information such as national or local research, surveys, feedback from customers, monitoring information and also use the local knowledge that you, your team and staff delivering a service have to identify if the proposed change could affect service users from equality groups that share a “protected characteristic” differently. You will also need to assess if the proposed change will have a broader impact in relation to promoting social inclusion, community cohesion and integration and opportunities to deliver “social value”.

Please note that the term ‘change’ is used here as shorthand for what requires an equality analysis. In practice, the term “change” needs to be understood broadly to embrace the following:

- Policies, strategies and plans
- Projects and programmes
- Commissioning (including re-commissioning and de-commissioning)
- Service Review
- Budgets
- Staff structures (including outsourcing)
- Business transformation programmes
- Organisational change programmes
- Processes (for example thresholds, eligibility, entitlements, and access criteria)

You will also have to consider whether the proposed change will promote equality of opportunity; eliminate discrimination or foster good relations between different groups or lead to inequality and disadvantage. These are the requirements that are set out in the Equality Act 2010.

#### 1.1 Analysing the proposed change

##### 1.1.1 What is the name of the change?

Croydon Cycling Strategy

##### 1.1.2 Why are you carrying out this change?

Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

The strategy sets out a vision for cycling.

We are aiming for:

- Croydon’s cycle routes and facilities being as good as the best in London
- All our cycle facilities can be used by all cyclists including those with disabilities
- Croydon will have an extensive network of attractive and safe cycling routes covering all corners of the borough.
- There will be high levels of cycling amongst residents from all backgrounds and communities in Croydon.

- Every household in the borough wanting to access secure cycle parking shall have it.
- Cycling will be considered a safe form of transport for everyday journeys for people of all ages.
- Real or perceived conflict between cyclists and other street users will be minimised
- Zero cyclist road casualties as part of a wider 'Vision Zero'.

**1.1.3 What stage is your change at now?**

See **Appendix 1** for the main stages at which equality analyses needs to be started or updated.

A draft strategy has been prepared and is going to Cabinet for adoption.

**Please note that an equality analysis must be completed before any decisions are made. If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.**

**1.2 Who could be affected by the change and how**

**1.2.1 Who are your internal and external stakeholders?**

For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

Residents and businesses across the borough who would benefit from investment in cycling. Transport for London as major funder of cycle schemes. Local cycling groups and cyclists travelling within, into or through the borough. Internally staff across the Council such as Regeneration, Streets, Planning and Strategic Transport, Public Health and Active Lifestyles.

**1.2.2 What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?**

The outputs from delivery of the strategy would be:

- Implementation of a network of cycle routes. We will be enhancing the existing cycle route network through Quietways on local roads, Cycle Highways on busier roads and Greenways through green spaces.
- Supporting safe and secure on and off-street cycle parking
- Implementing permeability measures such as cut throughs on road closures and contraflow cycling in one-way roads
- Improving the environment for cycling such as through 20mph speed limits and zones,

traffic management measures and local safety schemes

- Development of cycle hubs
- Creating a Cycling Culture and Changing Behaviour
- Delivering a behavioural change programme including cycle training
- Support for travel plans for schools and require travel plans as part of development proposals
- Measures to enhance cycle safety such as Freight Operator Recognition Scheme [FORS]
- Measures to enhance cycle availability such as cycle to work schemes, cycle loans, Brompton Dock and cycle libraries

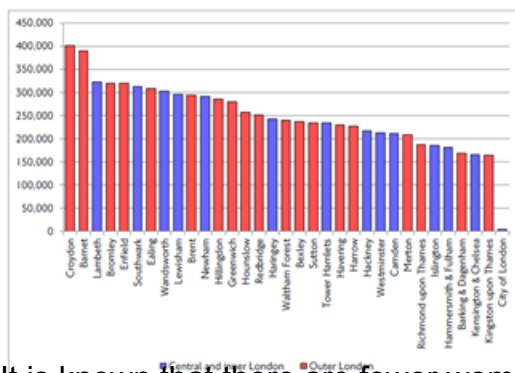
**1.2.3 Does your proposed change relate to a service area where there are known or potential equalities issues?**

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response If you don't know, you may be able to find more information on the Croydon Observatory (<http://www.croydonobservatory.org/>)

Yes.

Cycling is potentially available to all. TfL has assessed Croydon having the greatest Cycling Potential (largest number of journeys that could be cycled) of all London boroughs. However, Croydon has the lowest cycle mode share of all the London Boroughs at 1%. Consequently a lot of Croydon people from all groups are being denied the health, access an economic benefits of cycling.

Figure 4.2: potentially cyclable trips by borough of residence



It is known that there are fewer women cyclists although in Croydon more women take up Cycle training. Children, young people, older people and members of certain BME groups are under represented amongst cyclists.

**1.2.4 Does your proposed change relate to a service area where there are already local or national equality indicators?**

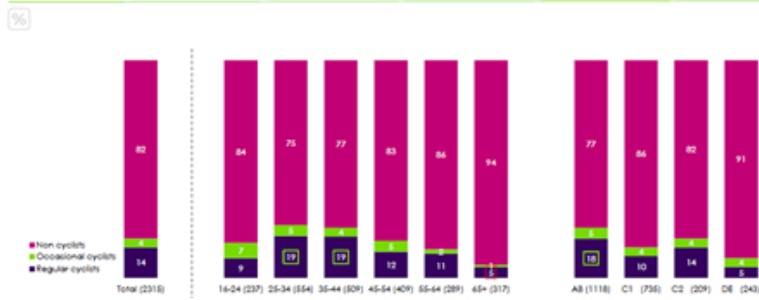
You can find out from the Equality Strategy (<http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf> ). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

TfL undertakes a an annual Attitudes Towards Cycling survey which contains a good many indicators just some of the data are shown below

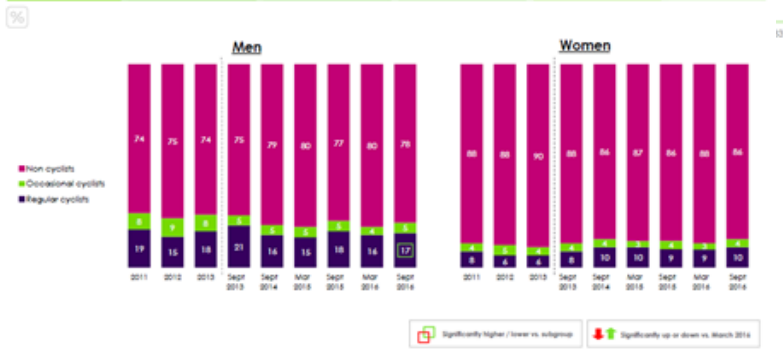
## Profile of cyclists (Sept 2016)



## Profile of cyclists (Sept 2016)



## Profile of cyclists (trend)



## Percentage able to ride a bike (Sept 2016)



Q8(K2): Can you ride a bicycle?  
Base: All respondents Sept 2016 (2315)

## 1.2.5 Analyse and identify the likely advantage or disadvantage associated with the

**change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a “protected characteristic”**

**Please see Appendix 2 (section 1) for a full description of groups.**

	<b>Likely Advantage</b> 😊	<b>Likely Disadvantage</b> ☹️
Disability	All cycle facilities should be designed to accommodate hand bikes, trikes and other non-standard cycles.	None
Race/ Ethnicity	All sectors of the community will benefit from investment in cycling facilities	None
Gender	All sectors of the community will benefit from investment in cycling facilities in particular the creation of Quietways and segregated / semi segregated Cycle Highways. Sustrans 2009 ‘What stops women getting on their bikes?’ research showed that not feeling safe was the biggest concern women had about cycling	None
Transgender	All sectors of the community will benefit from investment in cycling facilities	None
Age	Cycling is suitable for all age groups. Children in particular should benefit from the creation of Quietways and segregated / semi segregated Cycle Highways plus better enforcement of speed limits. TfL’s Attitudes Towards Cycling reports shows ‘I’m worried about traffic / collisions’ as the main reason for not letting children cycle. –	None
Religion /Belief	All sectors of the community will benefit from investment in cycling facilities	None
Sexual Orientation	All sectors of the community will benefit from investment in cycling facilities	None
Pregnancy and Maternity	Women can still cycle during pregnancy	None
Social inclusion issues	The cycle facilities and other measures will be provided across the borough. Cycling is a relatively cheap form of transport available to almost everyone.	None
Community Cohesion	As cycle facilities will be provided	None

Issues	across the borough, all communities will benefit. Getting people out of cars and cycling brings them back out into the community	
Delivering Social Value	Cycling can contribute to a range of environmental and economic outcomes such as better air quality, reduced traffic noise, support for local economy by encouraging local trips, health benefits and mitigating climate change	None

<b>1.2.6</b>	<b>In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?</b>
	For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation

In addition to the design of cycle infrastructure we need to look at how our cycle promotional activities such as cycle training are designed in order to encourage and enable disabled people and people for certain BME groups to participate. We need to monitor effectively to assess how successful we are and reshape our activities when and where needed.

<b>1.2.7</b>	<b>Would your proposed change affect any protected groups more significantly than non-protected groups?</b>
	Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....

Yes. The Strategy aims for an inclusive cycling culture and hence aims to overcome the barriers to disabled people cycling more; overcome road danger fears deterring more women cycling and cultural issues causing some members of certain BME groups not considering cycling. It also aims for quality cycling infrastructure to allow more children and young people to cycle.

<b>1.2.8</b>	<b>As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do not?</b>
	In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes <i>etc.</i>
	<b>Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.</b>

Yes, The Strategy aims to enable more disabled people and more young people to be part of the

cycling 'community/culture'. It does however acknowledge the concerns some blind and partially sighted people have regarding sharing space with cyclists in certain circumstances. The strategy takes as its starting point avoiding pedestrians and cyclists sharing the same space. Were such sharing cannot be avoided, the Strategy proposes engaging with blind and partially sighted people at the early stage of any proposals.

**1.2.9 As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?**

In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act

**Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.**

Yes. The Strategy is aimed at developing an inclusive cycling culture and in particular is aimed at overcoming the unintended discrimination against disabled cyclists.

**1.2.10 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?**

In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.

**Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response**

No. Promotion of cycling and provision of cycle facilities would not impact on relationships between protected and unprotected groups.

### **1.3 Decision on the equality analysis**

**If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a protected characteristic (compared to**

non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
<p><b>No, further equality analysis is not required</b></p>	<p>Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge.</p> <p><b>You must include this statement in any report used in decision making, such as a Cabinet report</b></p>	
<p><b>Yes, further equality analysis is required</b></p>	<p>Please state why and outline the information that you used to make this decision. Also indicate</p> <ul style="list-style-type: none"> <li>• When you expect to start your full equality analysis</li> <li>• The deadline by which it needs to be completed (for example, the date of submission to Cabinet)</li> <li>• Where and when you expect to publish this analysis (for example, on the council website).</li> </ul> <p><b>You must include this statement in any report used in decision making, such as a Cabinet report.</b></p>	<p>The Strategy is an opportunity to promote greater equality and have a positive effect in enabling more children and young people, more disabled people, more women and more people from BME groups to cycle and enjoy the access and health benefits of cycling. The information suggesting that these groups are currently underrepresented amongst cyclists (and the causes of it) are largely drawn from the results of TfL's regular attitude towards cycling surveys. Opportunities to do this need to be explored through further engagement when facilities are being designed (especially if pedestrians and cyclists sharing space is being considered as part of the proposals) and more detailed auditing</p>
<p><b>Officers that must approve this decision</b></p>	<p><b>Name and position</b></p>	<p><b>Date</b></p>
<p><b>Report author</b></p>	<p>Ian Plowright</p>	<p>20/12/2017</p>
<p><b>Director</b></p>	<p>Heather Cheesbrough</p>	<p>09/01/2018</p>



Decision	Guidance	Response

#### 1.4 Feedback on Equality Analysis (Stage 1)

Please seek feedback from the corporate equality and inclusion team and your departmental lead for equality (the Strategy and Planning Manager / Officer)

<b>Name of Officer</b>	Ian Stone	
<b>Date received by Officer</b>	20.12.17	Please send an acknowledgement
<b>Should a full equality analysis be carried out?</b>	Yes	There are opportunities to promote greater equality in cycling participation as well as a more inclusive cycling culture and a full EA should be undertaken to ensure these opportunities are realised.

## **Stage 2 Use of evidence and consultation to identify and analyse the impact of the change**

### **Use of data, research and consultation to identify and analyse the probable Impact of the proposed change**

This stage focuses on the use of existing data, research, consultation, satisfaction surveys and monitoring data to predict the likely impact of proposed change on customers from diverse communities or groups that may share a protected characteristic.

Please see Appendix 2 (section 2) for further information.

**2.1 Please list the documents that you have considered as a part of the equality analysis review to enable a reasonable assessment of the impact to be made and summarise the key findings.**

This section should include consultation data and desk top research (both local and national quantitative and qualitative data) and a summary of the key findings.

Cycle Forum consulted May 2017  
 Mobility Forum consulted September 2017  
 Meeting with Wheels for Wellbeing October 2017  
 Streets, Environment and Homes Scrutiny Committee consideration of the draft Strategy (including evidence given by Wheels for Wellbeing) June 2017 and resulting report and recommendations  
 TfL's Attitudes Towards Cycling report 2016  
 Full Equality Analysis undertaken into allowing 24 hour cycling in North End  
 Meetings with Croydon Vision regarding allowing cycling in North End and in parks  
 Meeting of stakeholders at the Fiveways Junction including Croydon Vision representative  
 Wheels for Wellbeing national guidance on inclusive cycling infrastructure  
 Beyond the Bicycle conference on inclusive cycle infrastructure  
 Cycling Instructor.Com cycle training data for Croydon  
 Sustrans 2009 'What stops women getting on their bikes?' research  
 'What are the barriers to cycling amongst ethnic minority groups and people from deprived backgrounds?' TfL, 2011

**2.2 Please complete the table below to describe what the analysis, consultation, data collection and research that you have conducted indicates about the probable impact on customers or staff from various groups that share a protected characteristic.**

<b>Group's with a "Protected characteristic" and broader community issues</b>	<b>Description of potential advantageous impact</b>	<b>Description of potential disadvantageous impact</b>	<b>Evidence Source</b>
Age	Young and old underrepresented amongst cyclists. The strategy proposes		TfL Attitudes Towards Cycling

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
	high quality cycle routes to overcome fear of road danger. It also propose promoting electric bikes which can assist older people cycle.		
Disability	The strategy aims for cycling infrastructure and training to be capable of being used by users of wheelchair cycles, hand bikes and other nonstandard bikes		Feedback and input direct from Wheels for wellbeing and via the Beyond the Bicycle conference and guide to inclusive cycling
Gender	The strategy provides for more cycling routes and reduced conflict with other road users which will promote greater confidence and participation rates among women		Sustrans 2009 'What stops women getting on their bikes?' research
Race/ Ethnicity	'Black and ethnic minority (BME) groups, women, people from more deprived neighbourhoods, those with disabilities and older people are typically under-represented in cycling. However, there is a significant opportunity to increase cycling amongst these groups. For example, BMEs represent 35% of all 'potential' cyclists in London.' Hence the strategy can and should work to increase participation in cycling amongst BME groups.		'What are the barriers to cycling amongst ethnic minority groups and people from deprived backgrounds?' TfL, 2011

<b>2.3</b>	<p><b>Are there any gaps in information or evidence missing in the consultation, data collection or research that you currently have on the impact of the proposed change on different groups or communities that share a protected characteristic? If so, how will you address this?</b></p> <p>Please read the corporate public consultation guidelines before you begin:</p>
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<http://intranet.croydon.net/finance/customerservices/customerserviceprogramme/stepbystepguide.asp>.

It is proposed to undertake 'Household Travel Planning' in 2018/19. This will be an opportunity to gather detailed information regarding what is stopping people for a wide range of groups from cycling. This in turn should shape our infrastructure and promotional activities programmes.

We need to be gathering and using more information about the people participating in our promotional activities in order to ensure that we try and make them fully inclusive.

**2.4 If you really cannot gather any useful information in time, then note its absence as a potential disadvantageous impact and describe the action you will take to gather it.**

Please complete the table below to set out how will you gather the missing evidence and make an informed decision. Insert new rows as required.

Group's with a "Protected characteristic" and broader community issues	Missing information and description of potential disadvantageous impact	Proposed action to gather information

### Stage 3 Improvement plan

#### Actions to address any potential disadvantageous impact related to the proposed change

This stage focuses on describing in more detail the likely disadvantageous impact of the proposed change for specific groups that may share a protected characteristic and how you intend to address the probable risks that you have identified stages 1 and 2.

**3.1 Please use the section below to define the steps you will take to minimise or mitigate any likely adverse impact of the proposed change on specific groups that may share a protected characteristic.**

Equality Group (Protected Characteristic)	Potential disadvantage or negative impact e	Action required to address issue or minimise adverse impact	Action Owner	Date for completing action
Disability	The concern that some blind or partially sighted people have sharing space with cyclists	General presumption against sharing space. Where cannot be avoided, blind and partially sighted people to be engaged with early in the design / consideration process	Ian Plowright and infrastructure designers	Ongoing
Age	Children and young people continuing to be underrepresented amongst cyclists and hence lose out on the benefits of active travel.	Promotional activities in schools, implementation of Quietways etc and monitoring success in terms of numbers cycling to school.	Ian Plowright and Mike Barton	Ongoing
Gender	Women are amongst the majority amongst those taking up cycle training in Crodyon but amongst the minority of people cycling	Implement high quality cycle infrastructure to make cycling safer. Conduct research amongst women taking cycle training to understand what else needed to help get cycling	Ian Plowright and Mike Barton	Ongoing
BME	TfL's research 'What are the barriers to cycling amongst ethnic minority groups and people from deprived backgrounds' sets out the reasons for lower levels of cycling amongst BME groups as well as pointing to solutions	The planned 'Household Travel Planning' should be directed to parts of the Borough where members of BME groups are living. This with a view to provide a direct encouragement to cycle, better understand what is preventing people for cycling and tailoring the promotional activities to the needs of members of different BME groups	Ian Plowright	Ongoing

<b>3.2</b>	<b>How will you ensure that the above actions are integrated into relevant annual department or team service plans and the improvements are monitored?</b>
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The monitoring of outcomes of promotional activities and infrastructure delivery will be reported to the Cycle Forum and both the monitoring information and Cycle Forum will shape delivery

<b>3.3</b>	<b>How will you share information on the findings of the equality analysis with customers, staff and other stakeholders?</b>
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Published as a background/supporting document to the Cycling Strategy Cabinet paper on the Council's website

**Section 4 Decision on the proposed change**

<b>4.1</b>	<b>Based on the information in sections 1-3 of the equality analysis, what decision are you going to take?</b>
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Decision	Definition	Yes / No
<b>We will not make any major amendments to the proposed change because it already includes all appropriate actions.</b>	Our assessment shows that there is no potential for discrimination, harassment or victimisation and that our proposed change already includes all appropriate actions to advance equality and foster good relations between groups.	
<b>We will adjust the proposed change.</b>	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change. We are going to take action to make sure these opportunities are realised.	Yes
<b>We will continue with the proposed change as planned because it will be within the law.</b>	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change.  However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned.	
<b>We will stop the proposed change.</b>	The proposed change would have adverse effects on one or more protected groups that are not justified and cannot be lessened. It would lead to unlawful discrimination and must not go ahead.	

<b>4.2</b>	<b>Does this equality analysis have to be considered at a scheduled meeting?</b> If so, please give the name and date of the meeting.
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Published as a background/supporting document to the Cycling Strategy Cabinet paper on the Council's website

**4.3 When and where will this equality analysis be published?**

An equality analysis should be published alongside the policy or decision it is part of. As well as this, the equality assessment could be made available externally at various points of delivering the change. This will often mean publishing your equality analysis before the change is finalised, thereby enabling people to engage with you on your findings.

Published as a background/supporting document to the Cycling Strategy Cabinet paper on the Council's website

**4.4 When will you update this equality analysis?**

Please state at what stage of your proposed change you will do this and when you expect this update to take place. If you are not planning to update this analysis, say why not

Refreshed annually and fully updated in five years when making the next strategy

**4.5 Please seek formal sign of the decision from Director for this equality analysis?**

This confirms that the information in sections 1-4 of the equality analysis is accurate, Comprehensive and up-to-date.

<b>Officers that must approve this decision</b>	<b>Name and position</b>	<b>Date</b>
<b>Head of Service / Lead on equality analysis</b>	<b>Ian Plowright, Head of Transport</b>	<b>21 Dec 2017</b>
<b>Director</b>		

**Email this completed form to [equalityandinclusion@croydon.gov.uk](mailto:equalityandinclusion@croydon.gov.uk), together with an email trail showing that the director is satisfied with it.**