

Equality Impact Analysis

Equality Impact Analysis (EqIA) (or Equality Impact Assessment) aims to make services and public policy better for all service-users and staff and supports value for money by getting council services right first time.

We use EqIAs to enable us to consider all relevant information from an Equality requirements perspective when procuring or restructuring a service, or introducing a new policy or strategy. This analysis of impacts is then reflected in the relevant action plan to get the best outcomes for the Council, its staff and service-users¹.

EqIAs are used to analyse and assess how the Council's work might impact differently on different groups of people². EqIAs help the Council to make good decisions for its service-users, staff and residents and provide evidence that those decision conform with the Council's obligations under the Equality Act 2010³.

This template sets out the steps you need to take to complete an EqIA for your project. Guidance for sections is in the end-notes. If you have any questions about your EqIA and/or how to complete this form, please use the contact details at the end of this form.

Title of Project/Service/Policy⁴	East Sussex BSIP Bus Priority Measures - Seaside Road/St Anthony's Avenue, Eastbourne
Team/Department⁵	Major Projects & Growth
Directorate	Communities, Economy and Transport
Provide a comprehensive description of your Project (Service/Policy, etc.) including its Purpose and Scope⁶	East Sussex County Council (ESCC) submitted its Bus Service Improvement Plan (otherwise known as BSIP) to Government in October 2021. The East Sussex BSIP actively addresses the National Bus Strategy aiming to enhance bus services by collaborating with Local Transport Authorities, bus operators, community and business voices, bus passengers, and the voluntary and health transport sector. The BSIP sets out ambitious plans to improve the bus network across the county and provide a cleaner, reliable alternative to car travel. It focusses on enhancing the bus network within East Sussex to complement and support wider transport investment across the country and encourage a sustainable mode shift towards bus usage.

The bus priority measures under the capital element of the BSIP funding aim to improve bus reliability, reduce congestion, encourage greater bus use, create safer options for active travel and compliment wider initiatives across the county. In 2023, ESCC proposed 7 bus priority measures, of which five have been selected to proceed.

In response to the 2023 consultation feedback, the original bus lane proposals for Seaside Road and St Anthony's Avenue have been reviewed and revised to address the previously raised concerns whilst balancing the competing demands of different users (pedestrians, cyclists, public transport, drivers, space for on-road parking) on the available road space. This revised scheme design will go back to public consultation.

The revised design proposes:

- Eastbound bus lane between Windermere Crescent and Seaside Roundabout to speed up journey times for buses, improve bus reliability and reduce congestion for other road users
- Westbound bus lane between Seaside Roundabout and Langney Roundabout to speed up journey times for buses, improve bus reliability and reduce congestion for other road users
- Two new pedestrian crossings at Seaside Roundabout, and three new pedestrian crossings near St Andrew's Church, Co-op and Lidl respectively to provide safe crossing points for pedestrians
- Retaining existing parking spaces wherever possible in response to the 2023 consultation feedback and prioritising parking outside of homes and businesses
- Introducing new parking spaces to offset

Full details of the changes and improvements can be found on the online consultation web page: <https://consultation.eastsussex.gov.uk/economy-transport-environment/bsipbusprioritymeasures-eastbourne>

The consultation questions have been expanded to gain more detailed feedback on the scheme, and the 'Inclusivity' section has been updated to capture additional data for other categories of

	respondents. (e.g. carers) WSP have been asked to provide more cross-tabulation of data to allow for the more accurate reporting of how respondents of different characteristics responded.
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Initial assessment of whether your project requires an EqlA

When answering these questions, please keep in mind all legally protected equality characteristics (sex/gender, gender reassignment, religion or belief, age, disability, ethnicity/race, sexual orientation, marriage/civil partnership, pregnancy and maternity) of the people actually or potentially receiving and benefiting from the services or the policy.

In particular consider whether there are any potential equality related barriers that people may experience when getting to know about, accessing or receiving the service or the policy to be introduced or changed.

Discuss the results of your Equality assessment with the Equality Lead for your department and agree whether improvements or changes need to be made to any aspect of your Project.

	Question	Yes	No	Don't Know
1	Is there evidence of different needs, experiences, issues or priorities on the basis of the equality characteristics (listed below) in relation to the service or policy/strategy area?	Yes		
2	Are there any proposed changes in the service/policy that may affect how services are run and/or used or the ways the policy will impact different groups?	Yes		
3	Are there any proposed changes in the service/policy that may affect service-users/staff/residents directly?	Yes		
4	Is there potential for, or evidence that, the service/policy may adversely affect inclusiveness or harm good relations between different groups of people?		No	
5	Is there any potential for, or evidence that any part of the service/aspects of the policy could have a direct or indirect discriminatory effect on service-users/staff/residents?	Yes		
6	Is there any stakeholder (Council staff, residents, trade unions, service-users, VCSE organisations) concerned about actual, potential, or perceived discrimination/unequal treatment in the service or the Policy on the basis of the equality characteristics set out above that may lead to taking legal action against the Council?		No	
7	Is there any evidence or indication of higher or lower uptake of the service by, or the impact of the policy on, people who share the equality characteristics set out above?	Yes		

If you have answered "YES" or "DON'T KNOW" to any of the questions above, then the completion of an EqlA is necessary.

The need for an EqlA will depend on:

- How many questions you have answered “yes”, or “don’t know” to;
- The likelihood of the Council facing legal action in relation to the effects of service or the policy may have on groups sharing protected characteristics; and
- The likelihood of adverse publicity and reputational damage for the Council.

Low risk	Medium risk	High risk
	x	

1. Update on previous EqlAs and outcomes of previous actions (if applicable)⁷

What actions did you plan last time? (List them from the previous EqlA)	What improved as a result? What outcomes have these actions achieved?	What <u>further</u> actions do you need to take? (add these to the Action Plan below)
<p>Age: Actively target older population groups during the consultation period. Provide alternative means for older people to engage with the consultation process.</p>	<p>Measure of success: A high return of completed consultation surveys from those aged 65 and over.</p> <p>Outcomes:</p> <p>Full Survey: 30% of 1366 respondents aged 65 and over. (approx. 410 individuals)</p> <p>Online Survey: In all but one age group (85+) respondents found out about this consultation via social media. For those aged 85+, Email was the primary source.</p>	<ul style="list-style-type: none"> • Ensure all information sources are available to the older population, as social media has less reach from 55 onwards. • On the consultation survey, utilise age range selections to avoid receiving unusable data and easier for reporting. • Increase the total area for the delivery of consultation postcards

<p>Age: Actively target younger population groups during the consultation period.</p>	<p>Measure of success: A good return of completed consultation surveys from those aged 30 and under.</p> <p>Outcomes:</p> <p>Full Survey: 12% of 1366 respondents aged 24 and under. (approx. 164 individuals) 28% of 1366 respondents aged 34 and under (approx. 383 individuals)</p> <p>Online Survey: In all younger age ranges, social media was listed as how they find out about the consultation. The second most frequent source was word of mouth, with all other sources vastly less common.</p>	<ul style="list-style-type: none"> • Maintain engagement with the younger population via social media. • On the consultation survey, utilise age range selections to avoid receiving unusable data and easier for reporting.
<p>Disability: Actively engage with disability activist groups and representatives during the consultation period to ensure their voices are heard.</p>	<p>Measure of success: A good return of completed consultation surveys from those identifying as being disabled</p> <p>Outcomes:</p> <p>Full Survey:</p>	<ul style="list-style-type: none"> • Ensuring that the webpage continues to provide access to an easy read brochure and the Equality Impact Assessment (EqIA). This will help ensure that the public consultation is fully inclusive and accessible to all members of the community, in line

	<p>20% of 1793 respondents said that they had a physical or mental health condition. (approx. 359 individuals) 19% of 1793 respondents preferred not to say. (approx. 341) Most common condition referenced was physical impairment, followed by a long-standing illness and mental health condition.</p> <p>Online Survey: Effectiveness of information sources did not seem to differ when comparing those who answered either yes or no to having a physical or mental health condition or illnesses lasting or expected to last 12 months or more.</p> <p>Across every listed physical or mental health condition or illness, social media was the most prevalent information source in all cases.</p> <p>Disability Rights Reference Group (DDRG): On 18 August 2023, we attended the Disability Rights Reference Group (DDRG) to present the proposed BSIP Bus Priority measures. A summary of the key discussion points in relation to the BSIP proposals is provided below:</p>	<p>with ESCC's Diversity and Inclusion Strategy.</p> <ul style="list-style-type: none"> • Ensure that live consultation events are held at multiple locations, for ease of access. All locations should have wheelchair access and toilet facilities for those with mobility issues. • Printed survey materials should be easy to read for residents with visual impairments. • Members of the project team to remain available to assist residents with visual impairments to complete paper surveys during live consultation events. • Assess appetite for new Focus Group to be set up if interest is there from accessibility groups in Eastbourne • Address concerns raised by East Sussex Vision Support that the proposed new bus stop system will not be easier to use than the existing system.
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	<ul style="list-style-type: none"> • Comments regarding the accessibility to easy-read materials with a suggestion that images and further simplified language would be beneficial. • It was raised that consultation with bus operators on pinch points would only identify options currently available; if there is no service, there will not be a problem. • The consultation team were also made aware of a learning disability group that could be consulted upon. • Two events were suggested, one online and one in-person to further discuss the bus priority proposals. This feedback was provided back to the design team and incorporated in the design proposals. <p>Accessibility Travel Focus Group A focus group was planned and advertised for 18 September 2023; this was proposed to be an Accessibility Focus Group, with the invitation extended to 14 accessibility groups across East Sussex. The session was planned to take place at the Eastbourne Blind Society; however, this event did not go ahead as no invitees RSVP'd to the event.</p>	
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<p>Carers: Actively target carer groups during the consultation period.</p>	<p>Measure of success: A good return of completed consultation surveys from those identifying as carers.</p> <p>Outcomes:</p> <p>Full Survey: 5 out of 76 comments believed that the BSIP bus priority proposals would have a negative impact on carers. Quantity of carers completing the survey was not overtly established.</p> <p>Online Survey: Not captured in the previous online survey.</p>	<ul style="list-style-type: none"> • Include an additional question in the 'Inclusivity' section of the survey to capture whether respondents class as a carer.
<p>Sex: Seek opportunities for women to feedback on the proposed schemes consultation. Offer alternative options for providing feedback and be mindful of certain times (e.g. school pick up time) where women are more likely to have caring responsibilities.</p>	<p>Measure of success: At least a 50% return of completed consultation surveys from women.</p> <p>Outcomes:</p> <p>Full Survey: 48% of 1811 respondents identified as female. (approx. 870 individuals) 12% of 1811 respondents preferred not to give details. (approx. 217 individuals)</p> <p>Online Survey:</p>	<ul style="list-style-type: none"> • Include additional questions in the 'Inclusivity' section of the survey to capture whether respondents class as a parent / carer / guardian. • Ensure that live consultation events are held at multiple time slots, to cater for women who may have caring responsibilities during work hours.

	Overall, women had the highest percentage of respondents answer that they found out about the consultation via social media, when compared with other gender options.	
Sex: Look more strategically within ESCC at the representation of women's needs within transport planning and infrastructure.	<p>Measure of success: At least a 50% return of completed consultation surveys from women.</p> <p>Outcomes: Survey responses indicated above.</p> <p>Continued consideration within ESCC on how women's needs are being represented in planning, and how they will be contemplated in potential upcoming design stages.</p>	<ul style="list-style-type: none"> • Speak with the ESCC Equalities team to understand where there may be areas to improve or blind-spots when it comes to women's needs within transport planning and infrastructure.

2. Review of information, equality analysis and potential actions

Consider the actual or potential impact of your project (service, or policy) against each of the equality characteristics.

Protected characteristics groups under the Equality Act 2010	What do you know ⁸ ? Summary of data about your service-users and/or staff	What do people tell you ⁹ ? Summary of service-user and/or staff feedback	What does this mean ¹⁰ ? Impacts identified from data and feedback (actual and potential)	What can you do ¹¹ ? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations

<p>Age¹²</p>	<p>Between the last two censuses, the average (median) age of Eastbourne increased by two years, from 43 to 45 years of age.</p> <p>This area had a higher average (median) age than the South East as a whole in 2021 (41 years) and a higher average (median) age than England (40 years).</p> <p>The number of people aged 65 to 74 years rose by just over 2,200 (an increase of 22.1%), while the number of residents between 35 and 49 years fell by just under 1,200 (6.0% decrease).</p>	<p>From the 2023 BSIP Consultation Report:</p> <p>Those over 55 comprised 52% of the survey responses. This is generally considered representative of the wider East Sussex population, which has a much older age profile than the UK as a whole.</p> <p>21 respondents commented that the BSIP bus priority proposals would have a negative impact on older people.</p> <p>29 respondents commented that the BSIP bus priority proposals would have a negative impact on young people.</p> <p>From the East Sussex Seniors Association meeting:</p> <p>Engagement with St Andrews School and Tollgate schools regarding the Seaside proposals were discussed stating that this area is very</p>	<p>Passengers on the bus services in the proposed scheme location are likely to be older, particularly during inter-peak times.</p> <p>Older passengers will benefit from reduced journey times and greater bus reliability.</p> <p>Older car drivers may be concerned about the reallocation of road space and what this might mean for them.</p> <p>Young people are more likely to be reliant on public transport, and more likely to have concerns about fares and bus reliability.</p>	<p>Actively target older population groups during the consultation period. Provide alternative means for older people to engage with the consultation process.</p> <p>The new scheme should increase bus journey time, reliability and improve connectivity around Eastbourne.</p> <p>Additional street parking has been retained since the last scheme proposals, and lane widths all meet required minimum specifications, having been looked at through a Road Safety Assessment.</p> <p>Maintain clear communication throughout the consultation and moving into next design stage – not just relying on online platforms.</p>
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		<p>busy with parents and children using the road, pathways and buses twice a day.</p>		<p>Put out a press release so that all age groups can be made aware of the consultation and how they can respond.</p> <p>Increased numbers of flyer deliveries to addresses around Seaside Road and St Anthony's Avenue.</p>
<p>Disability¹³</p>	<p>In Eastbourne over 20% of residents identify as disabled How life has changed in Eastbourne: Census 2021 (ons.gov.uk)</p>	<p>From the 2023 BSIP Consultation:</p> <p>21 respondents commented that the BSIP bus priority proposals would have a negative impact on those with a disability.</p> <p>From the DDRG: Concerns about accessibility and effectiveness of new planned bus stops, compared with the current bus stops</p>	<p>The new scheme proposals are aimed at reducing congestion on the roads and thus reducing vehicle emissions. This will have great health benefits for all but especially those with long-term respiratory conditions.</p> <p>Improvements to bus stops, including access, signage and live-time bus timetables will benefit those with disabilities to feel more confident and reassured when travelling by bus.</p> <p>Disabled passengers will benefit from reduced journey times and greater bus reliability.</p>	<p>Actively engage with disability activist groups and representatives during the consultation period to ensure their voices are heard.</p> <p>Ensure that proposed designs are tested for accessibility and safety as we move through to the next design stage.</p> <p>Stay in contact with groups such as East Sussex Vision to keep updated with the next design stages and choice of bus stop upgrades.</p>

			Disabled car drivers may be concerned about the reallocation of road space on some of the schemes and what this might mean for them.	Additional street parking has been retained since the last scheme proposals and disabled parking bay spaces will be retained where feasible.
Gender reassignment¹⁴	0.46% of people in Eastbourne responded in the Census 2021 indicating that their gender identity was different from their sex registered at birth. East Sussex 2021 Census Briefing: Gender Identity and Sexual Orientation (eastsussexjsna.org.uk)	<p>From the 2023 BSIP Consultation:</p> <p>Respondents were asked to specify their gender, 10 respondents (less than 1% of respondents) described their gender as non-binary.</p> <p>Respondents were also asked whether their gender is the same as the one they were registered at birth. A total of 1,781 respondents answered this, 7 respondents said that their gender was now different to the one they were registered with at birth (less than 1%).</p> <p>0 respondents commented that the BSIP bus priority proposals would have a</p>	This protected characteristic is not deemed to be affected negatively by the new scheme proposals.	Continue to listen to feedback from those who have undergone or are undergoing gender reassignment for their feedback on the scheme proposals.

		negative impact on those that have undergone or are undergoing gender reassignment		
Pregnancy and maternity ¹⁵	Those who are pregnant or with young children will prefer and often need to travel by bus rather than car. For this reason, a reliable bus service in Eastbourne remains important for this protected characteristic.	Data regarding pregnancy or maternity was not requested during previous consultation. 0 respondents commented that the BSIP bus priority proposals would have a negative impact on those that who are pregnant or with young babies.	Pregnant people and those on maternity will greatly benefit from reduced bus journey times and improved bus reliability – making journeys by bus easier may in turn reduce isolation of new parents. Improvements to bus stops and pedestrian crossings will make it safer for those with pushchairs and small children.	Make the benefits for those who are pregnant or with young babies clear when communicating about the scheme proposals. Include an additional question in the consultation survey to capture data on whether respondents are a parent/carer/guardian for one or more children or young people under age 16.
Race (ethnicity) ¹⁶ Including migrants, refugees and asylum seekers	Data from the 2021 census shows that Eastbourne has a higher percentage (approximately, 82%) of White British and Northern Irish compared to England	From the 2023 BSIP Consultation: The vast majority of respondents were White (97.5%). The remaining ethnic groups comprised a relatively small proportion of	This protected characteristic is not deemed to be affected negatively by the new scheme proposals.	Continue to listen to feedback from the public, including ethnic minorities, migrants, refugees and asylum seekers for their feedback on the scheme proposals.

	<p>(approximately, 74%). Other white (7.7%) is by far the largest Ethnic group other than White British or Northern Irish, higher than East Sussex (4.6%) and England (6.5%). East Sussex Joint Strategic Needs Assessment (eastsussexjsna.org.uk)</p>	<p>the overall total of respondents, with 18 respondents identifying as being of mixed ethnicity (1.2%), while 14 respondents identified as Asian (0.9%). Three respondents identified as Black, and three gave another ethnicity which included Arabic and Caribbean backgrounds. Although broadly representative of the East Sussex population - where 93.9% of the population are White - this does indicate that minority ethnic groups were slightly under-represented in the survey, relative to their population size.</p> <p>0 respondents commented that the BSIP bus priority proposals would have a negative impact on ethnic minority groups.</p>		
Religion or belief¹⁷	<p>In 2021, 43.2% of Eastbourne residents reported having "No religion", up from</p>	<p>From the 2023 BSIP Consultation:</p>	<p>This protected characteristic is not deemed to be affected negatively by the new scheme proposals.</p>	<p>Actively engage with religious groups especially those who have places of worship</p>

	<p>29.2% in 2011. The rise of 14.0 percentage points was the largest increase of all broad religious groups in Eastbourne. Because the census question about religious affiliation is voluntary and has varying response rates, caution is needed when comparing figures between different areas or between censuses. How life has changed in Eastbourne: Census 2021 (ons.gov.uk)</p> <p>In 2021, 45.9% of people in Eastbourne described themselves as Christian (down from 59.6%), while 6.7% did not state their religion (down from 8.0% the decade before).</p>	<p>In terms of religion, the largest number of respondents stated that they had no religion (702) followed by those identifying as Christian (688). Less represented religious groups included Buddhist (8 respondents) and those of a Philosophical belief (7 respondents). Of those that gave 'other' as a response, these included responses such as Jedi, Pagan, Jehovah's Witness and queries over why the question was being asked.</p> <p>0 respondents commented that the BSIP bus priority proposals would have a negative impact on religious people.</p>		<p>adjacent to proposed scheme to ensure their voices are heard.</p>
Sex¹⁸	<p>52% of the Eastbourne's population was estimated to be female</p>	<p>From the 2023 BSIP Consultation:</p>	<p>This protected characteristic is not deemed to be affected negatively by the new scheme proposals.</p>	<p>This protected characteristic is not deemed to be affected</p>

	<p>and 48% male, matching the demographics of the county, and similar to the national split.</p>	<p>Respondents were asked to specify their gender, with the proportion of female respondents (48%) being larger than the proportion of male respondents (39%).</p> <p>This is broadly in line with the gender structure across the wider East Sussex population, where a greater number of people identify as female (52%) compared to male (48%)². If we discount the respondents who did not declare their gender, a greater proportion of women responded to the survey than men.</p>		<p>negatively by the new scheme proposals.</p> <p>Those of any sex should be able to realise the benefits available to all groups, namely having faster journey times, a more reliable service and better connectivity around Eastbourne.</p>
<p>Sexual orientation¹⁹</p>	<p>3.9% of people in Eastbourne responded in the Census 2021 indicating that they identified with an LGB+ orientation. East Sussex 2021 Census Briefing: Gender Identity and Sexual Orientation (eastsussexjsna.org.uk)</p>	<p>From the 2023 BSIP Consultation:</p> <p>When asked about their sexual orientation, 1,393 respondents gave an answer to this question, with 94% identifying themselves as Straight / Heterosexual, four percent as Gay or Lesbian, two percent as Bisexual and one percent as self-</p>	<p>This protected characteristic is not deemed to be affected negatively by the new scheme proposals.</p>	<p>This protected characteristic is not deemed to be affected negatively by the new scheme proposals.</p> <p>Those who identify with an LGB+ orientation should be able to realise the benefits available to all groups, namely having faster journey</p>

		described. Of those that self-described these included asexual, queer, and pansexual.		times, a more reliable service and better connectivity around Eastbourne.
Marriage and civil partnership²⁰	<p>Of Eastbourne residents aged 16 years and over, 35.8% said they had never been married or in a civil partnership in 2021, up from 33.3% in 2011.</p> <p>In 2021, just over 4 in 10 people (41.6%) said they were married or in a registered civil partnership, compared with 43.2% in 2011. The percentage of adults in Eastbourne that had divorced or dissolved a civil partnership increased from 11.5% to 12.2%.</p> <p>The increase in the percentage of people aged 16 years and over who had never been married or in a civil</p>	No feedback received currently and at present there are no questions in our consultation survey asking whether the respondent is married or in a civil partnership.	This protected characteristic is not deemed to be affected negatively by the new scheme proposals.	<p>This protected characteristic is not deemed to be affected negatively by the new scheme proposals.</p> <p>Those who are married and in civil partnerships should be able to realise the benefits available to all groups, namely having faster journey times, a more reliable service and better connectivity around Eastbourne.</p>

	<p>partnership was greater across the South East (2.9 percentage points, from 31.9% to 34.8%) than in Eastbourne (2.5 percentage points). Across England, the percentage increased by 3.3 percentage points, from 34.6% to 37.9%.</p> <p>These figures include same-sex marriages and opposite-sex civil partnerships in 2021, neither of which were legally recognised in England and Wales in 2011. Same-sex marriages have been legally recognised in England and Wales since 2014 and opposite-sex civil partnerships have been recognised since 2019.</p> <p>How life has changed in Eastbourne: Census 2021 (ons.gov.uk)</p>			
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Additional categories

(identified locally as potentially causing / worsening inequality)

Characteristic	What do you know ²¹ ?	What do people tell you ²² ?	What does this mean ²³ ?	What can you do ²⁴ ?
Rurality²⁵	The proposed bus priority schemes is in Eastbourne, therefore those in rural areas may feel disadvantaged or ignored by ESCC.	Feedback has not been sought from specifically those living in rural areas	Those living in rural areas may not feel listened to, or feel that their areas are being ignored in favour of further developments in larger towns.	<p>We are asking to capture post code data from those who respond to the consultation survey, which would allow us to identify feedback from those who live in more rural areas.</p> <p>We will look at the potential to improve bus routes and connectivity in rural areas in future BSIP schemes.</p>
Carers	In the Census 2021, Eastbourne saw the South East's second-largest percentage-point rise in the proportion of people who were economically inactive because they were looking after their family or home (from 3.2% in 2011 to 4.3% in 2021).	<p>From the 2023 BSIP Consultation:</p> <p>5 respondents commented that the BSIP bus priority proposals would have a negative impact on carers.</p> <p>Will analyse feedback from the next consultation.</p>	<p>Carers have responsibilities that may require them to make multiple short journeys or 'chain-journeys' during a day. This can bounce them out of 'usual' commuting routes.</p> <p>Carers may also be reliant on car travel and be concerned about road</p>	<p>Ensure carers can be identified in the consultation survey, by including a question in the 'Inclusivity' section.</p> <p>Address concerns about road space allocations, with our new scheme design planned to retain over 50% of parking space along Seaside Road and over 70% of</p>

	<p>Furthermore, Eastbourne saw the South East's joint largest percentage-point rise in the proportion of people (aged five years and over) providing between 20 and 49 hours of weekly unpaid care (from 1.4% in 2011 to 2.1% in 2021). How life has changed in Eastbourne: Census 2021 (ons.gov.uk)</p> <p>Note: Census 2021 was undertaken during the coronavirus (COVID-19) pandemic. This may have influenced how people perceived and managed their provision of unpaid care, and therefore may have affected how people chose to respond. Caution should also be taken when making comparisons between 2011 and 2021 because of changes in question wording and response options.</p>		<p>space allocation in the proposals.</p>	<p>spaces along St Anthony's Avenue.</p>
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Armed Forces²⁶	In 2021, 4.7% of people in Eastbourne reported that they had previously served in the UK armed forces, and 8.2% of households contained at least one armed forces veteran	No feedback received from the previous consultation survey. Will analyse feedback from the upcoming consultation.	It is not considered that this group will experience disproportionate, negative, neutral or positive impact by the new scheme proposals.	It is not considered that this group will experience disproportionate, negative, neutral or positive impact by the report. The updated consultation survey will include a question to identify whether respondents have or do serve in the Armed Forces, so that their feedback can be taken forward into the next design stage.
Impacts on community cohesion²⁷		No feedback received.	No impact on community cohesion has been identified.	No impact on community cohesion has been identified.
Other groups that may be differently affected (including but not only: homeless people, substance users, care leavers – see end note) ²⁸		No feedback received from other groups.	No impact has been identified on other groups.	We will continue to carefully monitor if there are any impacts on other groups of people using this bus service.

Assessment of overall impacts and any further recommendations²⁹ - include assessment of cumulative impacts (where a change in one service/policy/project may have an impact on another)

The 2024 consultation on the revised design for Seaside Road & St Anthony's Avenue will provide further understanding on those directly affected by the proposed changes. East Sussex County Council has worked to address key concerns raised during the last 2023 consultation, providing a new design which incorporates suggestions from those who completed the survey and those who contacted us.

The new designs for this scheme will help cut down journey times, increase the overall connectivity across Eastbourne and ensure more reliable and efficient bus services serving Seaside Road and St Anthonys Avenue.

The revised design proposes:

- Eastbound bus lane between Windermere Crescent and Seaside Roundabout to speed up journey times for buses, improve bus reliability and reduce congestion for other road users
- Westbound bus lane between Seaside Roundabout and Langney Roundabout to speed up journey times for buses, improve bus reliability and reduce congestion for other road users
- Two new pedestrian crossings at Seaside Roundabout, and three new pedestrian crossings near St Andrew's Church, Co-op and Lidl respectively to provide safe crossing points for pedestrians
- Retaining existing parking spaces wherever possible in response to the 2023 consultation feedback and prioritising parking outside of homes and businesses
- Introducing new parking spaces to offset

Full details of the changes and improvements can be found on the online consultation web page:

<https://consultation.eastsussex.gov.uk/economy-transport-environment/bsipbusprioritymeasures-eastbourne>

The consultation questions have been expanded to gain more detailed feedback on the scheme, and the 'Inclusivity' section has been updated to capture additional data for other categories of respondents. (e.g. carers) WSP have been asked to provide more cross-tabulation of data to allow for the more accurate reporting of how respondents of different characteristics responded.

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3. List detailed data and/or community feedback that informed your EqIA

Source and type of data (e.g. research, or direct engagement (interviews), responses to questionnaires, etc.)	Date Accessed	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)
State of the County 2021 Focus on East Sussex: Appendix 1 Item 5 - Appendix 1 - Focus on East Sussex.pdf	07/07/23	No data on sexuality	Have sourced data elsewhere
Ons Census 2021: East Sussex: East Sussex facts and figures - E10000011 - ONS	05/07/24		
DfT Statistical data set: Mode of travel Mode of travel - GOV.UK (www.gov.uk)	07/07/23		
Chartered Institution of Highways and Transportation: How can we make public transport safe for women and girls? CIHT	07/07/23		
ESCC Gender Identity and Sexual Orientation East Sussex 2021 Census Briefing: Gender Identity and Sexual Orientation (eastsussexjsna.org.uk)	05/07/24		
Eastbourne Borough Area Profile East Sussex Joint Strategic Needs Assessment (eastsussexjsna.org.uk)	05/07/24		

Responses from the ESCC 2023 BSIP Consultations. https://consultation.eastsussex.gov.uk/economy-transport-environment/busprioritymeasures/	22/05/24	No information on whether respondents identified as carers	An additional question has been added to the consultation survey asking the respondent if they are a carer
East Sussex Bus Service Improvement Plan (BSIP) – Bus Priority Measures Consultation Report.	22/05/24	Cross-referencing of respondent data with their feedback on the specific scheme proposals.	Have asked WSP to provide more cross-referenced findings in the next consultation report.
Disability Rights Reference Group (DDRG)	18/08/23		
East Sussex Seniors Association	15/09/23		
Active Travel Focus Group	12/09/23		
Accessibility Travel Focus Group	18/09/23	Focus group did not go ahead as no invitees RSVP'd to the event	Assess appetite for new Focus Group to be set up if interest is there from accessibility groups in Eastbourne
Direct engagement with East Sussex Vision Support	05/07/24		Continued engagement with East Sussex Vision Support and internally within ESCC to consider all concerns

4. Prioritised Action Plan³⁰

NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
Age	Ensure all information sources are available to the older population, as social media has less reach from 55 onwards.	Older people in Eastbourne will be made aware of the new scheme proposal, whether hearing from a postcard, press release, social media post or word of mouth.	Good coverage from all methods of communication reported back from the consultation results.	15 July – 18th August 2024
	On the consultation survey, utilise age range selections to avoid receiving unusable data and easier for reporting.	More accurate data, in theory no age data would have to be unused, as it would all fit within the decided age ranges.	No unusable data due to all ages fitting within the groupings provided.	
	Increase the total area for the delivery of consultation postcards	Wider reach to resident affected by the scheme proposals, including the older population. Also addressing complaints from the previous consultation that certain addresses were not delivered to.	Large number of survey responses indicating they found out via postcard.	

	Maintain engagement with the younger population via social media.	Younger people to be aware of the consultation via social media posts and press releases.	Good coverage from all methods of communication reported back from the consultation results, especially social media.	
Disability	Ensuring that the webpage continues to provide access to an easy read brochure and the Equality Impact Assessment (EqIA). This will help ensure that the public consultation is fully inclusive and accessible to all members of the community, in line with ESCC's Diversity and Inclusion Strategy.	The online consultation meets accessibility criteria for all users, allowing them to find the information they require and answer the survey questions without issue.	Minimal negative feedback about website accessibility.	15 July – 18th August 2024
	Ensure that live consultation events are held at multiple locations, for ease of access. All locations should have wheelchair access and toilet facilities for those with mobility issues.	All members of the public including those with disabilities are able to attend each of the in-person consultation events without physical limitation.	Seamless access to in-person consultation events for members of the public with disabilities.	

	Printed survey materials should be easy to read for residents with visual impairments.	Consultation materials to be printed using suitable font types and sizes, allowing all text to be as clear as possible.	Residents with visual impairments are able to read all consultation material, especially key information such as in-person consultation event dates and venue addresses.	
	Members of the project team to remain available to assist residents with visual impairments to complete paper surveys during live consultation events.	Members of the project team will be available during in-person consultation events to assist members of the public completing paper surveys, allowing residents with visual impairments to feel supported and able to complete the survey more quickly and without omissions.	Project team members being welcoming and showing availability to help members of the public with their paper surveys, and then assisting when called upon.	
	Assess appetite for new Focus Group to be set up if interest is there from accessibility groups in Eastbourne	Based on feedback from the next consultation and if moving into the next design stage, further engagement may be sought by ESCC if felt relevant when creating preliminary designs.	Discussion within ESCC to determine whether accessibility groups have expressed sufficient interest in holding a focus group.	
	Address concerns raised by East Sussex Vision Support that the proposed new bus stop system will not be easier to use than the existing system.	Concerns to be addressed within ESCC and looked at further in the next design stage.	Continued contact with East Sussex Vision Support and addressing of their concerns in the next design stage.	

Carers	Include an additional question in the 'Inclusivity' section of the survey to capture whether respondents class as a carer.	New data on how many respondents are carers, which can then be cross-referenced with other survey question responses to gather valuable feedback.	A good return of completed consultation surveys from those identifying as carers.	15 July – 18th August 2024
Sex	Include additional questions in the 'Inclusivity' section of the survey to capture whether respondents class as a parent / carer / guardian.	New data on how many respondents are parents/carers/guardians to children under 16.	New data on parents which can be cross-referenced with other responses to gain valuable feedback on the scheme proposals.	15 July – 18th August 2024

	<p>Ensure that live consultation events are held at multiple time slots, to cater for women who may have caring responsibilities during work hours.</p>	<p>Women will have the choice of three separate events to attend, based on which time works for them.</p>	<p>Good attendance from women during all three in-person consultation events.</p>	
	<p>Speak with the ESCC Equalities team to understand where there may be areas to improve or blind-spots when it comes to women's needs within transport planning and infrastructure.</p>	<p>Having internal conversation to look at any potential areas to improve when it comes to addressing women's needs within transport planning & infrastructure.</p>	<p>Suggestions and recommendations to take further in next design stages to ensure women's needs are still being met within transport planning & infrastructure.</p>	

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

Staff member competing Equality Impact Analysis:
Directorate Management Team rep or Head of Service:
Equality lead:

Humphrey Basset
Richard Dawson
Kaveri Sharma

Date: 05/07/2024
Date: 10/07/2024
Date: 09/07/2024

¹ 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 the Council's duties under the Equality Act 2010 and ensure they comply with them appropriately in their daily 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, rigorous part of your decision-making process and influence the process.
- **Sufficient Information:** you must assess what information you have and what is further needed to give proper consideration.
- **No delegation:** the Council is responsible for ensuring that any contracted services, which are provided on its behalf need also to comply with the same legal obligations under the Equality Act of 2010. You need, therefore, to ensure that the relevant contracts make these obligations clear to the supplier. It is a duty that cannot be delegated.
- **Review:** the equality duty is a continuing duty. It applies when a policy or service is developed/agreed, and when it is implemented and reviewed.
- **Proper Record Keeping:** to prove that the Council has fulfilled its legal obligations under the Equality Act you must keep records of the process you follow and the impacts identified.

NB: Filling out this EqIA in itself does not meet the requirements of the Council's equality duty. All the requirements above must be fulfilled, or the EqIA (and any decision based on it) may be open to challenge. An EqIA therefore can provide evidence that the Council has taken practical steps comply with its equality duty and provide a record that to demonstrate that it has done so.

² **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 actual and potential impact of our activities on people who share any of the legally '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 the nature of your project, who it might affect, those groups' vulnerability, and the seriousness of any potential impacts it might have. We use this EqIA template to gather information and assess the impact of our project in these areas.

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

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- **avoid, reduce, minimise or eliminate any negative impact** (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).
 - **promote equality of opportunity.** This means the need to:
 - Remove or minimise disadvantages suffered by equality groups
 - Take steps to meet the needs of equality groups
 - Encourage equality groups to participate in public life or any other activity where 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

³ **EqIAs are always proportionate** to:

- The nature of the service, or scope of the policy/strategy
- The resources involved
- The number of people affected
- The size of the likely impact
- The vulnerability of the people affected

The greater the potential adverse impact of the proposed service or policy on a protected group (e.g. disabled people), the more thorough and demanding our process must be so that we comply with the Equality Act of 2010.

⁴ **Title of EqIA:** This should clearly explain what service / policy / strategy / change you are assessing

⁵ **Team/Department:** Main team responsible for the policy, practice, service or function being assessed

⁶ **Focus of EqIA:** 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 Analysis (EqIA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the service, policy, strategy, practice, or function?

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- Who implements, carries out or delivers the service, policy, strategy, practice, 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 service, policy, strategy, practice, 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, are required and what should the benefits be?
 - What do existing or previous reviews of the service, policy, strategy, practice, or function indicate to you?
 - What is the reason for the proposal, or change (financial, service scope, legal requirements, etc)? The Equality Act requires us to make these clear.

⁷ **Previous actions:** If there is no previous EqIA, or this assessment is for a new service, then simply write 'not applicable'.

⁸ **Data:** Make sure you have enough information to inform your EqIA.

- What data relevant to the impact on protected groups of the policy/decision/service is available?⁸
- 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 protected characteristics 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 / communities?

⁹ **Engagement:** You must engage appropriately with those likely to be affected to fulfil the Council's duties under the Equality Act.

- What do people tell you about the services, the policy or the strategy?
- 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 different perspectives can be captured and considered.
- Identify any gaps in who has been consulted and identify ways to address this.

¹⁰ Your EqIA must get to grips fully and properly with actual and potential impacts.

- The Council's obligations under the Equality Act of 2010 do not stop you taking decisions, or introducing well needed changes; however, they require that you take decisions and make changes 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 protected 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?

¹¹ Consider all three aims of the Act: removing barriers, and also identifying positive actions to be taken.

- 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 address 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 EqIA which has attempted to airbrush the facts is an EqIA that is vulnerable to challenge.

¹² **Age:** People of all ages

¹³ **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. Carers of disabled people are protected within the Act by association.

¹⁴ **Gender Reassignment:** In the Act a transgender person is someone who proposes to, starts or has completed a process to change his or her gender. A person does not need to be under medical supervision to be protected

¹⁵ **Pregnancy and Maternity:** Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.

¹⁶ **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.

¹⁷ **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.

¹⁸ **Sex:** Both men and women are covered under the Act.

¹⁹ **Sexual Orientation:** The Act protects bisexual, gay, heterosexual and lesbian people

²⁰ **Marriage and Civil Partnership:** Only in relation to due regard to the need to eliminate discrimination.

²¹ **Data:** Make sure you have enough information to inform your EqIA.

- What data relevant to the impact on protected groups of the policy/decision/service is available?²¹
- 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 protected characteristics in turn. Eg: who uses the service? Who doesn't and why? Are there differences in outcomes? Why?

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- Have there been any important demographic changes or trends locally? What might they mean for the service or function?
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- What do people tell you about the services, the policy or the strategy?
- Are there patterns or differences in what people from different groups tell you?
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 - (a) consult when proposals are still at a formative stage;
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- 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 EqIA which has attempted to airbrush the facts is an EqIA that is vulnerable to challenge.

²⁵ **Rurality:** deprivation is experienced differently between people living in rural and urban areas. In rural areas issues can include isolation, access to services (eg: GPs, pharmacies, libraries, schools), low income / part-time work, infrequent public transport, high transport costs, lack of affordable housing and higher fuel costs. Deprivation can also be more dispersed and less visible.

²⁶ **Armed Forces:** The Armed Forces Act 2021 aims to help prevent service personnel, veterans and their families being disadvantaged when accessing public services. The new duty applies to certain housing, education or healthcare functions, but it is good practice to ensure consideration of impacts on current or former members of the armed forces, as well as their families.

²⁷ **Community Cohesion:** potential impacts on how well people from different communities get on together. The council has a legal duty to foster good relations between groups of people who share different protected characteristics. Some actions or policies may have impacts – or perceived impacts – on how groups see one another or in terms of how the council's resources are seen to be allocated. There may also be opportunities to positively impact on good relations between groups.

²⁸ **Other groups that may be differently affected:** this may vary by services, but examples include: homeless people, substance misusers, people experiencing domestic/sexual violence, looked after children or care leavers, current or former armed forces personnel (or their families), people on the Autistic spectrum etc.

²⁹ **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?

³⁰ **Action Planning:** The Council's obligation under the Equality Act of 2010 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.