EQUALITY ANALYSIS (EA) TEMPLATE

Decision

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Date

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What is the Public Sector Equality Duty (PSED)?

The Public Sector Equality Duty (PSED) is set out in the Equality Act 2010 (s.149). This requires public authorities, in the exercise of their functions, to have 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who do not, and

Foster good relations between people who share a protected characteristic and those who do not

The characteristics protected by the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex (gender)
- Sexual orientation

What is due regard?

- It involves considering the aims of the duty in a way that is proportionate to the issue at hand
- Ensuring real consideration is given to the aims and the impact of policies with rigour and with an open mind in such a way that is influences the final decision

The general equality duty does not specify how public authorities should analyse the effect of their business activities on different groups of people. However, case law has established that equality analysis is an important way public authorities can demonstrate that they are meeting the requirements.

Case law has established the following principles apply to the PSED:

- **Knowledge** the need to be aware of the requirements of the Equality Duty with a conscious approach and state of mind.
- **Sufficient Information –** must be made available to the decision maker.
- **Timeliness** the Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken not after it has been taken.
- **Real consideration** consideration must form an integral part of the decision-making process. It is not a matter of box-ticking; it must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- Sufficient information the decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty.
- No delegation public bodies are responsible for ensuring that any third parties which exercise functions on their behalf are capable of complying with the Equality Duty, are required to comply with it, and that they do so in practice. It is a duty that cannot be delegated.
- **Review** the duty is not only applied when a policy is developed and decided upon, but also when it is implemented and reviewed.

•	Due regard should be given before and during policy formation and when a	
	decision is taken including cross cutting ones as the impact can be	
	cumulative.	

What is an Equality Analysis (EA)?

An equality analysis is a risk assessment tool that examines whether different groups of people are, or could be, disadvantaged by service provision and decisions made. It involves using quality information, and the results of any engagement or consultation with particular reference to the protected characteristics to understand the actual effect or the potential impact of policy and decision making decisions taken.

The equality analysis should be conducted at the outset of a project and should inform policy formulation/proposals. It cannot be left until the end of the process.

The purpose of the equality analysis process is to:

- Identify unintended consequences and mitigate against them as far as possible, and
- Actively consider ways to advance equality and foster good relations.

The objectives of the equality analysis are to:

- Identify opportunities for action to be taken to advance quality of opportunity in the widest sense;
- Try and anticipate the requirements of all service users potentially impacted;
- Find out whether or not proposals can or do have any negative impact on any particular group or community and to find ways to avoid or minimise them;
- Integrate equality diversity and inclusion considerations into the everyday business and enhance service planning;
- Improve the reputation of the City Corporation as an organisation that listens to all of its communities;

However, there is no requirement to:

- Produce an equality analysis or an equality impact assessment
- Indiscriminately collect diversity data where equalities issues are not significant
- Publish lengthy documents to show compliance
- Treat everyone the same. Rather, it requires public bodies to think about people's different needs and how these can be met
- Make service homogenous or to try to remove or ignore differences between people.

An equality analysis should indicate improvements in the way policy and services are formulated. Even modest changed that lea to service improvements are important. In it is not possible to mitigate against any identified negative impact, then clear justification should be provided for this.

By undertaking and equality analysis officers will be able to:

- Explore the potential impact of proposals before implementation and improve them by eliminating any adverse effects and increasing the positive effects for equality groups
- Contribute to community cohesion by identifying opportunities to foster good relations between different groups
- Target resource more effectively
- Identify direct or indirect discrimination in current policies and services and improve them by removing or reducing barriers to equality

How to demonstrate compliance

The Key point about demonstrating compliance with the duty are to:

- Collate sufficient evidence to determine whether changes being considered will have a potential impact on different groups.
- Ensure decision makers are aware of the analysis that has been undertaken and what conclusions have been reached on the possible implications.
- Keep adequate records of the full decision making process.

In addition to the protected groups, it may be relevant to consider the impact of a policy, decision or service on other disadvantaged groups that do not readily fall within the protected characteristics, such as children in care, people who are affected by socio-economic disadvantage or who experience significant exclusion or isolation because of poverty or income, education, locality, social class or poor health, ex-offenders, asylum seekers, people who are unemployed, homeless or on a low income.

Complying with the Equality Duty may involve treating some people better than others, as far as this is allowed by discrimination law. For example, it may involve making use of an exception or the positive action provisions in order to provide a service in a way which is appropriate for people who share a protected characteristic – such as providing computer training to older people to help them access information and services.

Taking account of disabled people's disabilities

The Equality Duty also explicitly recognises that disabled people's needs may be different from those of non-disabled people. Public bodies should therefore take account of disabled people's impairments when making decisions about policies or services. This might mean making reasonable adjustments or treating disabled people better than non-disabled people in order to meet their needs.

Deciding what needs to be assessed

The following questions can help determine relevance to equality:

- Does the policy affect service users, employees or the wider community, including City businesses?
- How many people are affected and how significant is the impact on them?
- Is it likely to affect people with particular protected characteristics differently?
- Is it a major policy, significantly affecting how functions are delivered?
- Will the policy have a significant impact on how other organisations operate in terms of equality?
- Does the policy relate to functions that engagement has identified as being important to people with particular protected characteristics?
- Does the policy relate to an area with known inequalities?
- Does the policy relate to any equality objectives that have been set?

Consider:

- How the aims of the policy relate to equality.
- Which aspects of the policy are most relevant to equality?
- Aims of the general equality duty and which protected characteristics the policy is most relevant to.

If it is not clear if a policy or decision needs to be assessed through an equality analysis, a Test of Relevance screening tool has been designed to assist officers in determining whether or not a policy or decision will benefit from a full equality analysis.

Completing the Test of Relevance screening also provides a formal record of decision making and reasoning. It should be noted that the PSED continues up to and after the final decision is taken and so any Test of Relevance and/or full Equality Analysis should be reviewed and evidenced again if there is a change in strategy or decision.

Role of the assessor

An assessor's role is to make sure that an appropriate analysis is undertaken. This can be achieved by making sure that the analysis is documented by focusing on identifying the real impact of the decision and set out any mitigation or improvements that can be delivered where necessary.	Depending on the subject it may be helpful and easier to involve others. Input from another service area or from a related area might bring a fresh perspective and challenge aspects differently.
Who else is involved?	In addition, those working in the customer facing roles will have a particularly helpful perspective. Some proposals will be cross-departmental and need a joint approach to the equality analysis.
Chief Officers are responsible for overseeing the equality analysis proves within	
departments to ensure that equality analysis exercises are conducted according to	
the agreed format and to a consistent standard. Departmental equality	
representatives are key people to consult when undertaking an equality analysis.	

How to carry out an Equality Analysis (EA)

There are five stages to completing an Equality Analysis, which are outlined in detail in the Equality Analysis toolkit and flowchart:	2.3 – Developing an action plan – set out the action you will take to improve the positive impact and / or the mitigation action needed to eliminate or reduce any adverse impact that you have identified;
2.1 Completing the information gathering and research stage – gather as much relevant equality-related information, data or research as possible in relation to the policy or proposal, including any engagement or consultation with those affected;	2.4 Director approval and sign off of the equality analysis – include the findings from the EA in your report or add as an appendix including the action plan;

2.2 Analyse the evidence – make and assessment of the impact or effect on	2.5 Monitor and review – monitor the delivery of the action plan and ensure that
different equality groups;	changes arising from the assessment are implemented.

The Proposal

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1. What is the Proposal

The London Wall/Moorgate Oval Relandscaping project comes under the Cool Streets and Greening programme. The Oval is one of the only green spaces along the Moorgate corridor. In its current design, the Oval is significantly underused as it is not accessible to pedestrians and its enclosed design impedes pedestrian movement to/from the new Moorgate Crossrail entrance. The existing design does not provide the opportunity for enhanced biodiversity and climate resistant mitigations.

The London Wall/Moorgate relandscaping project reimagines the Oval, creating a more welcoming and interesting space. Revised designs provide a planting approach that will create a tranquil oasis of green for people working, visiting and travelling to/from the Crossrail station. The revised design of the Oval and surrounding area further creates an environment which allows pedestrians to interact with surrounding green infrastructure. The relandscaping design includes enhanced planting throughout the site and encourages people to stop and rest and will provide varying interest throughout the year.

Key features of the London Wall/Moorgate Oval Relandscaping project include:

- Removal of existing hedges surrounding the Oval, creating an open space
- New pathway through the Oval, allowing pedestrian movement through the Oval
- Introduction of green infrastructure, including planters with integrated seating, throughout the wider project area
- Introduction of trees and planting of diverse biodiversity
- Inclusion of a statue of poet John Keats, born in Moorgate in 1795

The London Wall/Moorgate Oval Relandscaping project aligns with the City's Climate Action Strategy and Transport Strategy by way of:

- Providing more public space that is accessible to all and delivering world-class public realm
- Incorporating protection from adverse weather in the design of streets and the public realm
- Introducing climate resistant and adaptive landscaping in planned work



2. What are the recommendations?

The to achieve the objectives of the London Wall/Moorgate Oval Relandscaping project the following is recommended:

• Footway Widths: It is advised that the footways are the appropriate width to accommodate the subsequent increase in trip generation and footfall within the area, taking into consideration the Moorage Crossrail entrance and surrounding developments. It is also advised footway widths are reviewed in relations to the placement of the planters. This will prevent vulnerable road users, which includes people with disabilities, as well as elderly people and young people, from having

Version Control Version:1.2 Author: Amanda Lee-Ajala Last updated: 1 February 2022 Date of next review: 1 March 2023 to cross the road unnecessarily or navigate around the platers, improving road safety for all users. It is recommended that the footway widths, including the new pathway through the Oval, are designed in conjunction with TfL's Pedestrian Comfort Guidance Technical guide¹. The same approach is also recommended where the Oval sits adjacent to The Globe pub, thus ensuring appropriate widths relative to footfall.

- Level Access: In line with DfT's Inclusive Mobility Guide 2021², it is recommended that level access is provided throughout the Oval and that the placement and building of the planters do not obstruct or alter level access across the site. This will enable easy access for elderly people, those with limited mobility and those using mobility aids and pushchairs.
- Tactile Paving: In line with Department for Transport's (DfT) Inclusive Mobility Guide 2021 guidance³, it is recommended that tactile paving is in place to aid visually impaired people, specifically, but not limited to, planters and when accessing the Oval.
- Planters/Seating: It is recommended that the location of the proposed planters/seating within the Oval and throughout the wider site is carefully positioned to avoid obstructing any key routes which may be used by wheelchair and pushchair users and should also be picked out in contrasting colours to help those with visual impairments **Error! Bookmark not defined.** It is recommended that the location and arrangement of the proposed positioning of the planters are developed in consultation with landscape architects and the designs align with existing City accessibility principles. This will help to prevent street clutter and ensure visibility for all users of the space.
- Greening/Trees: It is recommended that the location and arrangement of the proposed greening/trees are developed in consultation with landscape architects and the designs align with existing City accessibility principles. This will help to prevent street clutter, ensure visibility, and avoid impeding pedestrian routes⁴. Consideration should also be given to the tree species, selecting those with minimal leaf shedding to avoid a slippery footway. Street maintenance could also be procured to carry out appropriate clearing during the Autumn/Spring.
- Lighting: It is recommended that the Oval and wider surrounding area is lit appropriately to prevent any anti-social behaviour, improve user safety for groups vulnerable to crime and further aid visually impaired members of the public. It is recommended that streetlights and signs should be mounted on walls or buildings whenever possible; if not, then placing them at the back of the footway as near the property line as possible is acceptable⁵.
- Maintenance of Pathway/Footways: The pathway proposed along the Oval and, more generally the footways throughout the surrounding area, will need to be regularly maintained. This is because uneven and/or gaps between setts, can cause issues for some users, including those who are vision impaired, wheelchair users, and those using crutches and sticks⁶.

¹ Pedestrian Comfort Guidance for London (tfl.gov.uk)

² Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (publishing.service.gov.uk)

³ Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (publishing.service.gov.uk)

⁴ <u>Manual for the Streets (publishing.service.gov.uk)</u>

⁵ City of London Lighting Strategy

⁶ Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (publishing.service.gov.uk)

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• Construction: A Construction Logistics Plan (CLP) should be implemented to minimise construction impacts. It should include measures such as suitable diversion routes with appropriate signage for any required footway closures, noise and pollution mitigation, and an appropriate CLP to avoid sensitive receptors. Continued liaison with stakeholders should also be undertaken to inform them of the diversion routes. On completion of the works, the City could also offer a guide to familiarise the changes to those who are visually impaired.

3. Who is affected by the Proposal?

The proposed scheme is located in the City of London, within the Coleman Street Ward. The City of London is a key commercial district, hosting the primary business district for the capital. The area around the proposed scheme also comprises of retail space, as well as restaurants, cafes, and pubs. The London Wall/Moorgate Oval is located within a short distance of new Moorgate Crossrail station entrance (two-minute walk) and is also accessible by Liverpool Street and Bank Underground and rail stations.

Given the proposed works are located within a key commercial district and the area boasts a high Public Transport Accessibility Level (PTAL) rating of 6b⁷, those that are likely to be affected by the proposals are pedestrians, cyclists, and other non-motorised users. These users are more likely to be of the working population commuting to their places of work. The City of London estimates approximately 513,000 daily commuters⁸ to the city. The opening of the Moorgate Crossrail station and other large-scale developments along the Moorgate corridor (i.e. 120 Moorgate, 21 Moorfields and 1 Ropemaker Street⁹) will further generate a significant number of additional commuter trips to the area. It is also important to note that although the population of the City of London is comparatively small compared to other London boroughs, residents living in the borough have the highest overall active, efficient, and sustainable mode share (93%)¹⁰, suggesting that residents are also likely to benefit from the improvements.

Although a predominantly business district, several other trip generators are located within close proximity of the London Wall/Moorgate Oval, which will attract users to the area. These include places of health facilities, listed buildings and a link to the Finsbury Circus Gardens. The site is easily accessible by sustainable modes, therefore, users are most likely to travel to these trip generators on foot, by bike and/or public transport.

It is assumed that although the relandscaping of the Oval will take place within hoarding boundaries, some protected characteristic groups, particularly disabled and elderly/younger groups, may be adversely impacted if the appropriate pedestrian diversions, noise and pollution mitigation, and CLPs are not in place. A full assessment of the potential impacts on each of the protected characteristic groups with regards to construction is provided below.

Age

Check this box if NOT applicable

Age - Additional Equalities Data (Service Level or Corporate)

The Office for National Statistics (ONS) Mid-2020¹¹ population estimates for the City of London states a total population of 10,938 for the borough. The age breakdowns for the City of London and London are detailed in Table 1 below:

⁷ WebCAT planning tool - Transport for London (tfl.gov.uk)

⁸ Our role in London - City of London

⁹ City of London Web Mapping

¹⁰ <u>Travel in London Report 13 (tfl.gov.uk)</u>

¹¹ https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland

 Table 1: Age Breakdown for City of London and London (Source: ONS Census Data 2020)

Age	City of London	Greater London
	%	%
Under 5 years	4.3%	6.6%
5 to 15 years	11%	14%
16 to 24 years	13%	10.3%
25 to 64 years	55.8%	56.9%
65 years and over	15.8%	12.2%
Total	100%	100%

The figures above illustrate that the City of London has slightly fewer people under the age of 15 (15.3%) compared to Greater London (20.6%). Conversely, the City of London has a slightly higher percentage of people aged 16 to 24 years and 65 years and over, when compared to Greater London. The percentage of people aged 25 to 64 years is similar between the City of London and Greater London region.

It should be noted that this data is not considered representative of the majority of the people likely to be affected by the proposed scheme given the large percentage of commuters regularly travelling to the area, rather than residents.

Table 2: Workforce Age Structure, City of London and Greater London 2011 (Source: City of London Workforce CENSUS 2011- Analysis by Age and Occupation)

Age Band	City of London		Greate	Greater London	
	Actual	%	Actual	%	
16 - 19	2,521	1%	81,959	2%	
20 - 24	26,806	8%	387,569	9%	
25 - 29	67,481	19%	685,431	15%	
30 - 34	70,450	20%	697,643	16%	
35 - 39	56,574	16%	591,814	13%	
40 - 44	45,902	13%	548,352	12%	
45 - 49	35,964	10%	507,549	11%	
50 - 54	24,541	7%	405,451	9%	
55 - 59	14,941	4%	295,937	7%	
60 - 64	8,293	2%	196,176	4%	
65 - 69	2,370	1%	73,115	2%	
70 - 74	863	0%	29,485	1%	

Total	356,706	100%	4,500,481	100
			.,	

Table 2 shows the age breakdown of the workforce of the City of London compared to Greater London. The figures show that the ages of 25-34 contribute a substantial proportion of the workforce at 39%. The same age range for Greater London comprises 31% of the workforce. This shows that the City of London has a greater proportion of young professionals compared to Greater London. Similarly, the 35-49 age group comprises 39% of the workforce in the City of London, compared to 36% of the Greater London workforce. The percentage of the workforce in the City of London aged 50 years and above (14%) is lower than the percentage for Greater London (23%), showing that the City of London has a smaller proportion of older professionals.

Sensitive receptors

With regards to sensitive receptors relevant to age, there are pharmacies and private health facilities (including medical, dental and optical) within the area. As noted elsewhere, the entrance to Moorgate Crossrail station is located in close proximity to the relandscaping project.

Locations where higher proportions of young people and older adults are likely to be concentrated include:

- Boots Pharmacy 100 metres of the proposed scheme
- Nut Tree Pharmacy 100 metres of the proposed scheme
- Health facilities (McMillan Healthcare, Medical Prime Centre, Roodlane Medical, ODL Dental Clinic, David Clulow Opticians) 100/150 metres of the proposed scheme

While not considered sensitive receptors, there are a number of financial institutions and retail units in close proximity to the project site. The Globe pub sits adjacent to the Oval.

What actions can be taken to avoid or mitigate any negative
impact or to better advance equality and foster good relations? Given that the proposals are at the preliminary design stage (See General Arrangement drawing for more details), it is highly recommended that the following is considered to mitigate any negative impact on elderly and younger people when developing the detailed design:

¹² Travel in London: Understanding our diverse communities 2019 (tfl.gov.uk) Version Control Version:1.2 Author: Amanda Lee-Ajala

Building on this, the DfT underlines the need to provide plenty of appropriately placed and designed seating in locations where people may have to wait and along pedestrian routes¹³. The proposals to provide seating as part of the public realm improvements within the Oval will help to achieve this, providing a place to rest along the pedestrian route.

Seating provision and clear, high-quality footways are particularly important for elderly people, who are more likely to be living with a long-term health condition and may have more limited mobility and stamina. Research undertaken by Age UK underlines this intersectionality between age and disability further, with figures showing that 52% of those aged 65 and over are disabled compared with only 9% under 64¹⁴

Street trees and other greening can also play a key role in helping to remove harmful PM¹⁰ particulates and NO² roadside emissions¹⁵ and mitigating against climate change impacts such as heating of streets (and provision of shaded areas), both of which young people and elderly people are disproportionately affected by¹⁶¹⁷.

The relandscaping project provides the opportunity to enhance the public realm, benefitting both elderly and younger users and help to address some of the key barriers to active travel for the elderly population.

Although the City of London has a smaller population under the age of 15 compared to London as a whole, 15.3% compared to 20.6% respectively, children and young people travelling through the area likely to benefit from the improved pedestrian environment on their journeys. For children and young people the enhanced space encourages more trips by active modes and provides a more attractive space to travel through.

- Level Access: In line with the DfT's Inclusive Mobility Guide 2021¹⁹. it is recommended that level access is provided throughout the Oval to enable easy access for elderly people, particularly those using mobility aids, as well as those travelling with young children in pushchairs.
- Footway Widths: Given the scale of the development, it is advised that the new footway through the Oval and leading to the Moorgate Crossrail entrance is an appropriate width to accommodate an increase in trip generation and footfall. It is recommended that the footway widths are designed in conjunction with TfL's Pedestrian Comfort Guidance Technical guide (See Appendix BError! Bookmark not defined.). This will ensure vulnerable road users, as well as those using pushchairs, have a maintained level of comfort when using this space.
- Seating: As the relandscaping project includes seating, it is advised that all seating requirements meet DfT's Inclusive Mobility Guide 2021²⁰ seating guidelines. This will enable pregnant women and those with young children to access seating.
- Construction: A CEMP or CLP should be implemented to minimise construction impacts. It should include measures such as suitable diversion routes with appropriate signage for any required footway closures. Continued liaison with stakeholders should also be undertaken to inform the plans.

While it should be acknowledged however that the majority of users are likely to be

²⁰ Inclusive mobility (publishing.service.gov.uk)

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¹³ Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (publishing.service.gov.uk)

¹⁴ https://www.ageuk.org.uk/london/about-us/media-centre/facts-and-figures/

¹⁵ https://www.london.gov.uk/sites/default/files/valuing londons urban forest i-tree report final.pdf

¹⁶ <u>https://www.unep.org/news-and-stories/blogpost/young-and-old-air-pollution-affects-most-vulnerable</u>

¹⁷ https://www.gov.uk/government/publications/health-matters-air-pollution/health-matters-air-pollution

¹⁹ Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (publishing.service.gov.uk)

those commuting to or visiting the area. As illustrated in Table 2, those commuting to the City of London are most likely to be between the ages of 25-49 (78% of the workforce) and are therefore not considered vulnerable to the factors listed above due to their age.

Relandscaping Construction Process:

The proposed relandscaping works will be undertaken within the existing hoarding boundaries and pedestrian diversions/wayfinding signage will be put into place.

In addition to this, it is not envisioned that ramps/other materials that will lead to step change will be used for the relandscaping construction phase. If ramps are needed at the time of construction, the quality of ramps will need to be considered as poor-quality ramps may pose accessibility issues for some users and are also likely to affect elderly people during the construction phase.

Building on this, several potential negative impacts on elderly and younger people have been identified if the appropriate measures are not in place during the construction phase¹⁸. These include:

- Wheelchair and mobility aid users may find it difficult to utilise the temporary ramps
- Construction noise can negatively affect elderly and young people
- Construction can also generate additional dust and pollutants which negatively impact people with respiratory or long-term illnesses

It is expected that the construction phase will lead to access issues or longer journey times for the elderly and those with limited mobility. This is because the works will not require road or bus stop closures therefore, access to the site and surrounding area via public transport or car will still be possible.

Summary:

In summary, the positive impacts associated with the improved pedestrian environment and public realm, are likely to be felt by all users, including residents, visitors, and commuters to the area, regardless of age.

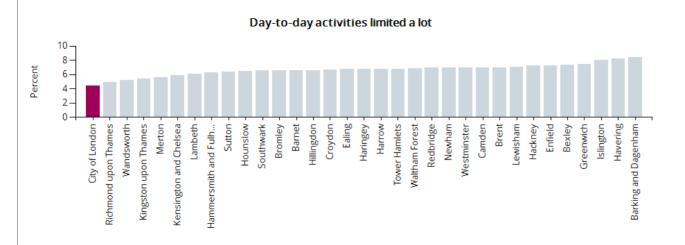
¹⁸ Transport, health and wellbeing (publishing.service.gov.uk) <u>Version Control</u> Version:1.2 Author: Amanda Lee-Ajala

With regards to construction, the proposed pedestrian diversions are deemed sufficient. Should ramps be used, it is recommended that any negative impact on access for elderly and younger people is offset by ensuring that suitable, clear diversions with ramps and appropriate signage are provided.	
 Key borough statistics: The City of London is dominated by businesses and the residential population is significantly lower compared to other London boroughs. 	• There is a smaller percentage of younger people (under 25) working in the City of London in comparison to Greater London, as well as a smaller percentage of over 45s. There is a larger percentage working in the City in the 25-44 age bands in comparison to Greater London.
• The City has proportionately more people aged between 25 and 69 living in the Square Mile than Greater London. Conversely there are fewer young people. Approximately 955 children and young people under the age of 18 years live in the City. This is 11.8% of the total population in the area.	

Disability - Additional Equalities Data (Service Level or Corporate)

ONS disability and well-being 2020 analysis shows that disability can negatively affect wellbeing. For example, the average well-being ratings for people aged 16 to 64 with a self-reported long-standing illness, condition or impairment which causes difficulty with day-day activities between July 2013 to June 2020 showed lower scores for life satisfaction each year²¹.

As per the Census 2011, the below graph (Figure 1) shows the percentage of the City of London residents who considered their day-to-day activities limited a lot due to disability or long-term illness compared with other London boroughs. The City of London compares favourably as it has the lowest percentage at 4.4%.



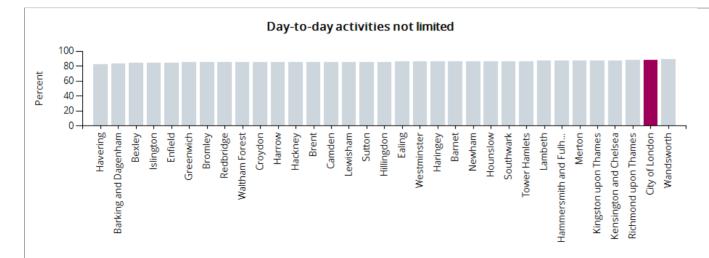
Source: ONS Census 2011

Figure 1: Limited activities due to disability (Source: ONS Census Data 2011)

The below graph (Figure 2) shows the percentage of the City of London residents who considered their day-to-day activities not to be limited by disability or long-term illness compared to other London boroughs. The City of London again compares favourably, as it had the second highest percentage at 88.5%.

²¹ <u>https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/datasets/disabilityandwellbeing</u> <u>Version Control</u> Version:1.2

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Source: ONS Census 2011

Figure 2: Unlimited activities due to disability (Source: ONS Census Data 2011)

Public Health England statistics support the above trend, as they report the percentage of people with a limiting long-term illness or disability in the City of London is 11.5% compared to 17.6% for England. This is considered significantly better than the national average²².

It should be noted that this data is not considered representative of the majority of the people likely to be affected by the proposed scheme given the large percentage of commuters regularly travelling to the area, rather than residents. Given that the area is likely to be visited by individuals living outside of the City, it is important to note that approximately one in ten individuals are estimated to be neurodivergent in Greater London (equating to approximately 900,000), and one-tenth of those are possibly autistic²³. Further to this, there are over 2 million people in the UK living with sight loss²⁴. With these statistics in mind, it is therefore paramount that the construction of and design of the proposed works considers all users.

Sensitive receptors

With regards to sensitive receptors relevant to age, there are pharmacies and private health facilities (including medical, dental and optician) within the area. As noted elsewhere, the entrance to Moorgate Crossrail station is located in close proximity to the relandscaping project.

Locations where higher proportions of young people and older adults are likely to be concentrated include:

- ²⁴ <u>https://www.rnib.org.uk/professionals/health-social-care-education-professionals/knowledge-and-research-hub/key-information-and-statistics-on-sight-loss-in-the-uk/</u> (data is not available
- at a local scale)

²² <u>https://www.localhealth.org.uk/#c=report&chapter=c05&report=r01&selgeo1=lalt_2021.E09000001&selgeo2=eng.E92000001</u>

²³ https://www.london.gov.uk/questions/2022/1716#:~:text=Andrew%20Boff%20AM%3A%20With%20approximately,900%2C000%20Londoners%20with%20neurodivergent%20conditions

- Boots Pharmacy 100 metres of the proposed scheme
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While not considered sensitive receptors, there are a number of financial institutions and retail units in close proximity to the project site. The Globe pub sits adjacent to the Oval.

What is the proposal's impact on the equalities aim?

The Oval Greening relandscaping project is likely to positively benefit all users, including those with disabilities.

The baseline data shows that there is a low comparative percentage of people with disabilities in the City of London. As illustrated in the section above however, the majority of people likely to be affected by the proposed works are less likely to be residents, therefore it is acknowledged that there may be a larger number of disabled people accessing the Oval and the surrounding area than the data suggests. This is likely to be facilitated by the accessibility of the area by Moorgate Crossrail station, enabling those with limited mobility to access the site and surrounding area given bus and step-free tube/train station provision.

Statistics show that 14% of Londoners currently consider themselves to have a disability that impacts their day-to-day activities 'a little' or 'a lot', and this is expected to rise to 17% by 2030²⁵. Further to this, walking is the main mode of travel for disabled Londoners, with 78% reporting they walk at least once a week.

With this in mind, it is therefore important that the design considers these requirements, which aligns with the City of London's Transport Strategy proposal to develop and apply the City of London Street Accessibility Standard (see page 52 of the strategy for more information **Error! Bookmark not defined.**).

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Given that the proposals are at the preliminary design stage (See General Arrangement drawing for more details), it is highly recommended that the following is considered to mitigate any negative impact on people with disabilities, when developing the detailed design:

- Tactile paving: In line with Department for Transport's Inclusive Mobility Guide 2021 guidance²⁷, it is recommended that tactile paving is in place to aid visually impaired people. This is particularly important to consider given that the Royal National Institute of Blind People (RNIB) report that walking is the main mode of travel for blind and partially sighted people, many of whom will have fewer transport options available to them than others²⁸.
- Level Access: In line with the DfT's Inclusive Mobility Guide 2021²⁹, it is recommended that level access is provided throughout the scheme to enable easy access for those with limited mobility and mobility aids.
- Footway Widths: Given the scale of the development, it is advised that the new footway through the Oval and leading to the Moorgate Crossrail entrance is an appropriate width to accommodate an increase in trip generation and footfall. It is recommended that the footway widths are designed in conjunction with TfL's Pedestrian Comfort Guidance Technical

²⁵ <u>https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/articles/outcomesfordisabledpeopleintheuk/2021</u>

²⁷ Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (publishing.service.gov.uk)

²⁸ Travel, transport and mobility | RNIB

²⁹ Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (publishing.service.gov.uk) <u>Version Control</u> Version:1.2 Author: Amanda Lee-Ajala

Research by Transport for All²⁶ has identified some of the key barriers to active travel for those with disabilities, including:

- Pavements cluttered by obstacles are difficult for those with mobility impairments to navigate and can pose a hazard to those with visual impairments. They are also confusing and overwhelming for those who are neurodivergent.
- Pavements that are steep, uneven, or bumpy are difficult to traverse in a wheelchair and can be trip-hazards. Tree roots, cobblestones, and poorly laid paving stones all contribute to this.

Similarly, these findings are echoed by DfT's Inclusive Mobility**Error! Bookmark not defined.** guide, whereby a number of barriers to navigating the pedestrian environment were identified, including obstacles, uneven surfaces, navigating slopes and ramps, etc. The guidance also underlines that good, inclusive design benefits all users, including those who have non-visible disabilities.

The proposed public realm improvements associated with the project should help to tackle some of these key barriers.

Relandscaping Construction Process:

The proposed relandscaping will be undertaken using hoarding boundaries and there appropriate pedestrian diversions/wayfinding signage will be put in to divert users away from the space.

In addition to this, it is not envisioned that ramps/other materials that will lead to step change will be used for the relandscaping construction phase. If ramps are needed at the time of construction, the quality of ramps will need to be considered as poor quality ramps may pose accessibility issues for some users and are also likely to affect disabled people during the construction phase. People with disabilities accessing health facilities in the area may also be affected on their journeys if the appropriate footway diversions are not in place during construction. guide³⁰. This will ensure vulnerable road users, as well as those using pushchairs, have a maintained level of comfort when using this space.

- Seating: It is recommended that the location of the proposed seating within the Oval is carefully positioned to avoid obstructing any key routes which may be used by wheelchair users and should also be picked out in contrasting colours to help those with visual impairments³¹.
- Trees: It is recommended that the location and arrangement of the proposed trees and greening are developed in consultation with landscape architects and the designs align with existing CoL guiding principles. This will help to prevent street clutter and ensure visibility³². Consideration should also be given to the tree species, selecting those with minimal leaf shedding to avoid a slippery footway. Street maintenance could also be procured to carry out appropriate clearing during the Autumn.
- Lighting: People with disabilities can feel especially vulnerable in places with limited surveillance and low lighting. It is therefore recommended that sufficient levels of lighting should be included in the design throughout the Oval. This will act to improve safety of all users and minimise any blind spots. The CoL Lighting Strategy should be consulted prior to final design.
- Maintenance of the Oval and other green infrastructure: The proposed landscaping throughout the Oval and the planters within the wider site will need to be regularly maintained. This is because uneven and/or gaps within the footway can cause issues for some users, including those who are vision impaired, wheelchair users, and those using crutches and sticks³³. Overgrown greening can reduce site lines and overgrown tree roots can act as a fall hazard.
- Construction: A CLP should be implemented to minimise construction impact. It should include measures such as suitable diversion routes with appropriate

²⁶ https://www.transportforall.org.uk/campaigns-and-research/pave-the-way/

³⁰ Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (publishing.service.gov.uk)

³¹ Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (publishing.service.gov.uk)

³² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1072722/Essex_Manual_for_Streets_Redacted.pdf

³³ Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (publishing.service.gov.uk)

Several potential negative impacts on people with disabilities have been identified if the appropriate measures are not in place during the construction phase**Error! Bookmark not defined.** These include:

- Wheelchair and mobility aid users may find it difficult to utilise the temporary ramps
- Those who are considered sensitive to changes in visual stimuli may find the diversions difficult to navigate
- Construction noise can negatively affect people with autism/other neurological disabilities
- Altered public realm and closures can be confusing to those with visual impairments who are familiar with the area
- Construction can also generate additional dust and pollutants which negatively impact people with respiratory or long-term illnesses

The relandscaping project will not result in reduced access issues or longer journey times for those with disabilities. This is because the works will not require road or bus stop closures therefore, access to the site and surrounding area via public transport or car will still be possible.

Summary:

It is likely that disability would be the protected characteristic group most affected by the proposals. Once construction is complete, the improved pedestrian environment and public realm would provide substantial benefits to disabled people.

As the construction phase commences, it is recommended that any negative impact on access for those with disabilities is offset by ensuring that suitable, clear diversions with ramps and appropriate signage are provided.

Key borough statistics:

Day-to-day activities can be limited by disability or long term illness – In the City of London as a whole, 89% of the residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (86%). In the areas outside the main housing estates, around 95% of the residents responded that their activities were not limited. Additional information on Disability and Mobility data, London, can be found on the London Datastore. signage for any required footway closures, as well as noise mitigation. Continued liaison with stakeholders should also be undertaken to inform the plans. On completion of the works, the develop could also offer a guide to familiarise the changes to those who are visually impaired.

The 2011 Census identified that for the City of London's population:

• 4.4% (328) had a disability that limited their day-to-day activities a lot

• 7.1% (520) had a disability that limited their day-to-day activities a little Source: 2011 Census: Long-term health problem or disability, local authorities in England and Wales

Measures on self-reported health were also collected during the 2011 census for the City of London borough. The responses were categorised into Very Bad, Bad, Fair, Good and Very Good health.	
 0.8% of the population of The City self-reported as having Very Bad health 55.8% of the population self-reported as having Very Good health 	

Gender Reassignment

Check this box if NOT applicable

Gender Reassignment - Additional Equalities Data (Service Level or Corporate)

It is not believed that the relandscaping project will impact this characteristic.

What is the proposal's impact on the equalities aim? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?
Click or tap here to enter text.	Click or tap here to enter text.
Key borough statistics: • Gender Identity update 2009 - ONS	NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Pregnancy and Maternity

Check this box if NOT applicable

Pregnancy and Maternity - Additional Equalities Data (Service Level or Corporate)

The ONS Conception Statistics, England and Wales, 2020 shows the conception numbers for the City of London³⁴. There were 5,659 conceptions in the City of London in 2020³⁵. This equates to a conception rate per 1,000 women aged 15 to 44 years of 74.6%. This is slightly higher than the average for Inner London (66.1%) and lower than the average for London as a whole (76.2%)³⁶.

There were 60 live births in the City of London in 2021. The Total Fertility Rate (TFR) in the City was 1.74. This is the average number of live children that women in the group could bare if they experienced age specific fertility rate of the calendar year throughout their childbearing lifespan. This is higher than the average for Inner London

Version Control Version:1.2

 $^{^{\}rm 34}$ Note these numbers have been combined with the Hackney borough to preserve confidentiality.

³⁵ Note these numbers have been combined with the Hackney borough to preserve confidentiality.

³⁶ <u>https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/conceptionandfertilityrates/datasets/conceptionstatisticsenglandandwalesreferencetables)</u>.

(1.28) and also for London as a whole $(1.52)^{37}$.

As mentioned above, it should be noted that this data is not considered representative of the majority of the people likely to be affected by the proposed scheme given the large percentage of commuters regularly travelling to the area, and more specifically the development, rather than residents.

Sensitive receptors

Facilities providing services for sensitive receptors in proximity to the proposed scheme which are most relevant to pregnancy and maternity are the same as those for disability.

 ³⁷ <u>Births in England and Wales: summary tables – Office for National Statistics (ons.gov.uk)</u>
 <u>Version Control</u> Version:1.2
 Author: Amanda Lee-Ajala

What is the proposal's impact on the equalities aim?

Pregnant women are known to have restricted mobility due to their pregnancy. The proposed works will provide safety and accessibility benefits to this group in a similar way to those mentioned for the above protected characteristics. The proposed seating locations and type, for instance, offer points of rest for pregnant women.

The relandscaping project provides other positive impacts for pregnant women. Access to green infrastructure is associated with positive outcomes for those who are pregnant, such as healthier birth weights³⁸. Pregnant women are also more likely to be impacted by poor air quality. While the project does not measure air quality, the expansion of green infrastructure will provide improved air quality within the area.

Parents with younger children and push chairs will also benefit from the improvements to the public realm, as the proposed works would improve the overall pedestrian environment.

In terms of sensitive receptors, there are health facilities within 500 metres of the proposed works which may be used by pregnant women. Users of these facilities will benefit from the improved pedestrian environment on their journey's to and from these facilities.

Relandscaping Construction Process:

The proposed works will be undertaken using hoarding, with clearly demarcated boundaries. Clear pedestrian diversions will be in place at the London Wall/Moorgate junction footways and leading to the Moorgate Crossrail station entrance.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Given that the proposals are at the preliminary design stage (See General Arrangement drawing for more details), it is highly recommended that the following is considered to mitigate any negative impact on pregnant women and those with young children when developing the detailed design:

- Level Access and Accessibility Requirements: In line with the DfT's Inclusive Mobility Guide 2021³⁹ and the City of London's guidelines⁴⁰, it is recommended that level access is provided throughout the project site. This will enable easy access for those travelling with young children in pushchairs.
- Footway Widths: Given the scale of the development, it is advised that the new footway through the Oval and leading to the Moorgate Crossrail entrance is an appropriate width to accommodate an increase in trip generation and footfall. It is recommended that the footway widths are designed in conjunction with TfL's Pedestrian Comfort Guidance Technical guide⁴¹. This will ensure vulnerable road users, as well as those using pushchairs, have a maintained level of comfort when using this space.
- Seating: As the relandscaping project includes seating, it is advised that all seating requirements meet DfT's Inclusive Mobility Guide 2021⁴² seating guidelines. This will enable pregnant women and those with young children to access seating.
- Lighting: Pregnant women and those with pushchairs can feel especially vulnerable in places with limited surveillance and low lighting. It is therefore recommended that sufficient levels of lighting should be included in the

⁴² Inclusive mobility (publishing.service.gov.uk) Version Control Version:1.2

³⁸ A4 Colour cover, vernacular (who.int)

³⁹ Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (publishing.service.gov.uk)

⁴⁰ Accessibility statement - City of London

⁴¹ Inclusive Mobility. A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (publishing.service.gov.uk)

In addition to diversion routes, it is not envisioned that ramps/other materials that will lead to step change will be used for the relandscaping construction phase. If ramps are needed at the time of construction, the quality of ramps will need to be considered as poor quality ramps may pose accessibility issues for some users and are also likely to affect disabled people. Pregnant women travelling to health facilities in the area may also be affected on their journeys if the appropriate footway diversions are not in place during the construction phase.

Building on this, several potential negative impacts on pregnant women and those using pushchairs have been identified if the appropriate measures are not in place during the construction phase. These include:

- Pushchair users may find it difficult to utilise ramps or step change
- Construction can also generate additional dust and pollutants which negatively impact pregnant women

Lastly, it is not considered that relandscaping the Oval will lead to access issues or longer journey times for pregnant women and those travelling with young children. This is because the works will not require road or bus stop closures therefore, access to the site and surrounding area via public transport or car will still be possible.

Summary:

Pregnant women may be negatively affected during the construction phase and without sufficient lighting incorporated into the design, however, the potential adverse impacts would be sufficiently managed through implementation of suitable design measures discussed in the adjacent actions section.

Key borough statistics:

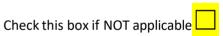
• There were 5,659 conceptions in Hackney and The City in 2020. This equates to a conception rate per 1,000 women aged 15 to 44 years of 74.6%. This is slightly higher than the average for Inner London (66.1%) and lower than the average for London as a whole (76.2%) **Error! Bookmark not defined.**.

design throughout the Oval. This will act to improve safety of all users and minimise any blind spots. For the relandscaping project, the CoL Lighting Strategy should be refered when finalising project designs⁴³.

 Construction: A CLP should be implemented to minimise construction impacts. It should include measures such as suitable diversion routes with appropriate signage for any required footway closures. Continued liaison with stakeholders should also be undertaken to inform the plans.

• There were 60 live births in The City of London in 2021. The Total Fertility Rate (TFR) in the City was 1.74. This is higher than the average for Inner London (1.28) and also for London as a whole (1.52)Error! Bookmark not defined..

Race



 ⁴³ <u>https://www.cityoflondon.gov.uk/assets/Services-Environment/city-of-london-lighting-strategy.pdf</u>
 <u>Version Control</u> Version:1.2
 Author: Amanda Lee-Ajala

Race - Additional Equalities Data (Service Level or Corporate)

It is not believed that that the relandscaping project will impact this characteristic.

What is the proposal's impact on the equalities aim? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact Click or tap here to enter text.	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations? <i>Click or tap here to enter text.</i>
Key borough statistics: Our resident population is predominantly white. The largest minority ethnic groups of children and young people in the area are Asian/Bangladeshi and Mixed – Asian and White. The City has a relatively small Black population, less than London and England and Wales. Children and young people from minority ethnic groups account for 41.71% of all children living in the area, compared with 21.11% nationally. White British residents comprise 57.5% of the total population, followed by White-Other at 19%.	The second largest ethnic group in the resident population is Asian, which totals 12.7% - this group is fairly evenly divided between Asian/Indian at 2.9%; Asian/Bangladeshi at 3.1%; Asian/Chinese at 3.6% and Asian/Other at 2.9%. The City of London has the highest percentage of Chinese people of any local authority in London and the second highest in England and Wales. The City of London has a relatively small Black population comprising 2.6% of residents. This is considerably lower than the Greater London wide percentage of 13.3% and also smaller than the percentage for England and Wales of 3.3%. See <u>ONS Census information</u> or <u>Greater London Authority projections</u> . NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.

Religion or Belief - Additional Equalities Data (Service Level or Corporate)

It is not believed that that the relandscaping project will impact this characteristic.

What is the proposal's impact on the equalities aim? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact Click or tap here to enter text.	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?
Key borough statistics – sources include: The ONS website has a number of data collections on <u>religion and belief</u> , grouped	NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.
under the theme of religion and identity.	
Religion in England and Wales provides a summary of the Census 2011 by ward level	

Sex

Check this box if NOT applicable

Sex - Additional Equalities Data (Service Level or Corporate)

It is not believed that the relandscaping project will impact this characteristic.

What is the proposal's impact on the equalities aim? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?
Click or tap here to enter text.	Click or tap here to enter text.
Key borough statistics:	A number of demographics and projections for demographics can be found on the
At the time of the 2011 Census the usual resident population of the City of London	Greater London Authority website in the London DataStore. The site details
could be broken up into:	statistics for the City of London and other London authorities at a ward level:
• 4,091 males (55.5%)	Population projections
• 3,284 females (44.5%)	NB: These statistics provide general data for these protected characteristics. You
	need to ensure you have sufficient data about those affected by the proposal.

Sexual Orientation - Additional Equalities Data (Service Level or Corporate)

It is not believed that that the relandscaping project will impact this characteristic.

What is the proposal's impact on the equalities aim? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?
Click or tap here to enter text.	Click or tap here to enter text.
Key borough statistics: • Sexual Identity in the UK – ONS 2014	NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.
Measuring Sexual Identity - ONS	

Marriage and Civil Partnership

Check this box if NOT applicable

Marriage and Civil Partnership - Additional Equalities Data (Service Level or Corporate)

It is not believed that that the relandscaping project will impact this characteristic.

What is the proposal's impact on the equalities aim? Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?
Click or tap here to enter text.	Click or tap here to enter text.
Key borough statistics – sources include:	NB: These statistics provide general data for these protected characteristics. You
The 2011 Census contain data broken up by local authority on marital and	need to ensure you have sufficient data about those affected by the proposal.
civil partnership status	

Additional Impacts on Advancing Equality and Fostering Good Relations

Additional Equalities Data (Service Level or Corporate)

Not applicable at this time.

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

Click or tap here to enter text.

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above? Provide details of how effective the mitigation will be and how it will be monitored.

Click or tap here to enter text.

This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the protected characteristics covered by these aims.

In addition to the sources of the information highlighted above – you may also want to consider using:

- Equality monitoring data in relation to take-up and satisfaction of the service
- Equality related employment data where relevant
- Generic or targeted consultation results or research that is available locally, London-wide or nationally
- Complaints and feedback from different groups.

Additional Impacts on Social Mobility

Additional Social Mobility Data (Service level or Corporate)

Not applicable at this time.

Are there any additional benefits or risks of the proposals on advancing Social Mobility?

Click or tap here to enter text.

What actions can be taken to avoid or mitigate any negative impact on advancing Social Mobility not considered above?

Provide details of how effective the mitigation will be and how it will be monitored.

Click or tap here to enter text.

This section seeks to identify what additional steps can be taken to promote the aims or to mitigate any adverse impact on social mobility. This is a voluntary requirement (agreed as policy by the Corporation) and does not have the statutory obligation relating to protected characteristics contained in the Equalities Act 2010. Analysis should be based on the data you have available on social mobility and the access of all groups to employment and other opportunities. In addition to the sources of information highlighted above – you may also want to consider using:

- Social Mobility employment data
- Generic or targeted social mobility consultation results or research that is available locally, London-wide or nationally
- Information arising from the Social Mobility Strategy/Action Plan and the Corporation's annual submissions to the Social Mobility Ind

Conclusion and Reporting Guidance

Set out your conclusions below using the EA of the protected characteristics and submit to your Director for approval.	Review your EA and action plan as necessary through the development and at the end of your proposal/project and beyond.
If you have identified any negative impacts, please attach your action plan to the EA which addresses any negative impacts identified when submitting for approval.	Retain your EA as it may be requested by Members or as an FOI request. As a minimum, refer to any completed EA in background papers on reports, but also include any appropriate references to the EA in the body of the report or as an
If you have identified any positive impacts for any equality groups, please explain how these are in line with the equality aims.	appendix.

It is anticipated that the once complete, the proposed that the Oval Greening landscaping works will provide benefits for protected characteristics including improved accessibility and comfort levels. These improvements would be enjoyed by all users and are likely to particularly benefit groups with protected characteristics related to age, disability and pregnancy/maternity.

As detailed throughout the assessment, there are opportunities for enhancement and impact mitigation during the construction phase. Further to this, designs should be developed to take into consideration the needs of key accessibility groups. The CoL Project Team should regularly review designs and to share and address any accessibility concerns. In line with the City of London's existing practices, it is advised that the final detailed design is assessed by CoL's in-house accessibility expert. Given the level of intervention, it is advised that this level of consultation is sufficient.

Outcome of analysis - check the one that applies

Outcome 1

No change required where the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

X Outcome 2

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustment will remove the barriers identified.

Outcome 3

Continue despite having identified some potential adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the duty to have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

Outcome 4

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Appendix

Appendix 1: General Arrangement Drawing