

Appendix 7

Bank on Safety

Equalities Analysis



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Date 09 May 2018

Section One: The Proposal

The Bank on Safety scheme at Bank Junction in the City of London focuses on restricting the number of vehicles that cross Bank Junction during the working day, primarily in order to significantly reduce the number of collisions occurring at this location. Under the scheme only buses and pedal cyclists are allowed to cross Bank Junction or access Cornhill in a westbound direction from Monday - Friday 7am-7pm. This is when 75% of the collisions previously occurred.

The scheme has been in place since 22 May 2017 and was implemented using an experimental traffic order – which is in place for a maximum of 18 months. This approach allows for any necessary modifications and enables appropriate monitoring to take place before a decision is made on whether the scheme is made permanent or not. This Equalities Analysis will be considered amongst other documents in the final decision taken on the scheme.

The four approved key success criteria for the scheme are as follows;

1. Must significantly improve road safety.
2. Should maintain the ability for businesses to reasonably undertake servicing, deliveries and critical business movements.
3. Must not worsen the overall air quality in the wider area and desirably reduces pollution in the immediate location of the junction.
4. Must not unreasonably impact general traffic flow in the area and desirably improve bus journey times.

A second supplementary Traffic Order for the Bank on Safety scheme was modified in July of 2017 to allow local businesses on King William Street to service their premises.

An equality analysis has been undertaken in accordance with the guidelines listed in Annex One of this document.

Section Two: Who is affected by the proposal?

The City of London is subject to the general public-sector equality duty set out in Section 149 of the Equality Act 2010, which requires it to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations by reference to people with protected characteristics. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

As part of its decision-making process on the Bank on Safety experimental scheme, the City of London Corporation has had due regard to any impacts on those with protected characteristics and the need to ensure that their interests are taken into account.

It should be noted that a Test of Relevance¹ was undertaken in November 2016 in order to understand whether an Equality Assessment (formally an Equalities Impact Assessment – EQIA) was necessary for the scheme. The Test of Relevance anticipated that there would be ‘no impact’ on protected groups, apart from those with a disability characteristic. Those with a disability were expected to be both positively and negatively impacted by the scheme.

It should be noted that emergency vehicles are exempt from the restriction.

As the trial scheme and the public consultation exercise have progressed, these matters have been kept under review. This document reflects the process by which the City of London has complied with its public-sector equality duty in implementing the Bank scheme.

¹ *‘On balance we believe the potential impact of the scheme on disabled users will be limited and at this stage does not require a full EQIA given the experimental nature of the scheme. As an experimental scheme, it has been developed mitigating the access impacts in the local area ensuring door to door access is maintained where it currently exists. The monitoring programme will assess the impact on equalities, giving opportunity where possible to change the scheme during the experiment to mitigate further where impacts are seen, but also so that before a final decision on whether the experiment is to become permanent is taken that a full understanding of any equalities impact (positive and negative) is understood. A full EQIA will be undertaken during the experiment. We will seek feedback from COLAG, and any other disability group that wants to take part, during the monitoring period and report back any findings to Committees in summer 2018 as part of our final recommendation of the experiment.’* **Test of Relevance - excerpt, November 2016.**

Section Three: Have you consulted on this project?

Officers consider all users of the junction to be affected by the Bank on Safety scheme at Bank Junction, including, but not limited to:

- Pedestrians, pedal cyclists and vehicle drivers
- Taxi drivers and passengers
- TfL bus passengers
- Servicing and delivery vehicle drivers
- Businesses in the surrounding area

Following approval by the City of London Corporation in December 2016 to implement the experimental scheme at Bank Junction, a number of statutory and public consultation exercises have been conducted amongst users over a period of 6 months, and as detailed in Annex Two of this document. These exercises have helped to inform key decision makers as to the impact and effectiveness of the scheme and, after the consultation and monitoring data has been collated, will help to determine whether the experiment should be made permanent or not.

The City of London has also contacted the following groups in the course of drafting this Equality Analysis;

- Age UK
- Guide Dogs for the Blind
- The City of London Access Group
- Royal National Institute of Blind People
- English Heritage
- Living Streets
- Sustrans

Section Four: Impacts on those with Protected Characteristics

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

Within this document a variety of datasets have been used to seek to assess the impacts on the above characteristics, these datasets are as follows;

- 2011 Census Data – this data has been analysed at a number of levels including London-wide, City of London-wide and where possible, the Bank Junction area.
- Bank on Safety Monitoring Reports - To date, two monitoring reports have been published by the City of London which focus on the performance of key metrics as outlined in Section Two.

On 24 November 2017, the first report covering monitoring and performance was submitted to Streets and Walkways Sub (Planning and Transportation) Committee.
<http://democracy.cityoflondon.gov.uk/mgAi.aspx?ID=67067>.

The second, updated monitoring and performance report was presented to Streets and Walkways Sub (Planning and Transportation) Committee on 10 April 2018
<http://democracy.cityoflondon.gov.uk/mgAi.aspx?ID=71626>.

- Public Consultation data – while the Public Consultation exercise did not directly gather data on the above characteristics, some feedback in relation to the protected characteristics has been captured. The Bank on Safety public consultation report is available on the agenda for the Streets and Walkways Sub (Planning and Transportation) Committee on 10 April 2018
<http://democracy.cityoflondon.gov.uk/mgAi.aspx?ID=71627>.
- Bank on Safety Perception Survey Results: The perception survey was an online survey which ran in parallel with the public consultation exercise.
- An independent report commissioned by the City of London and undertaken by Living Streets – ‘Bank on Safety’ Pedestrian Review December 2017 – February 2018
- STATS19 official collision statistics.
- Taxicard Data - Taxicard is a scheme for London residents with serious mobility impairments or who are visually impaired, the scheme allows residents to use both Private Hire Vehicles and Black Cabs. Taxicard data has been obtained by the City of London from London Councils for before and after the introduction of the Bank on Safety scheme.

- Office of National Statistics – Various datasets including conception and fertility rates.
*within some ONS datasets, to preserve confidentiality, counts for the City of London are combined with Hackney.

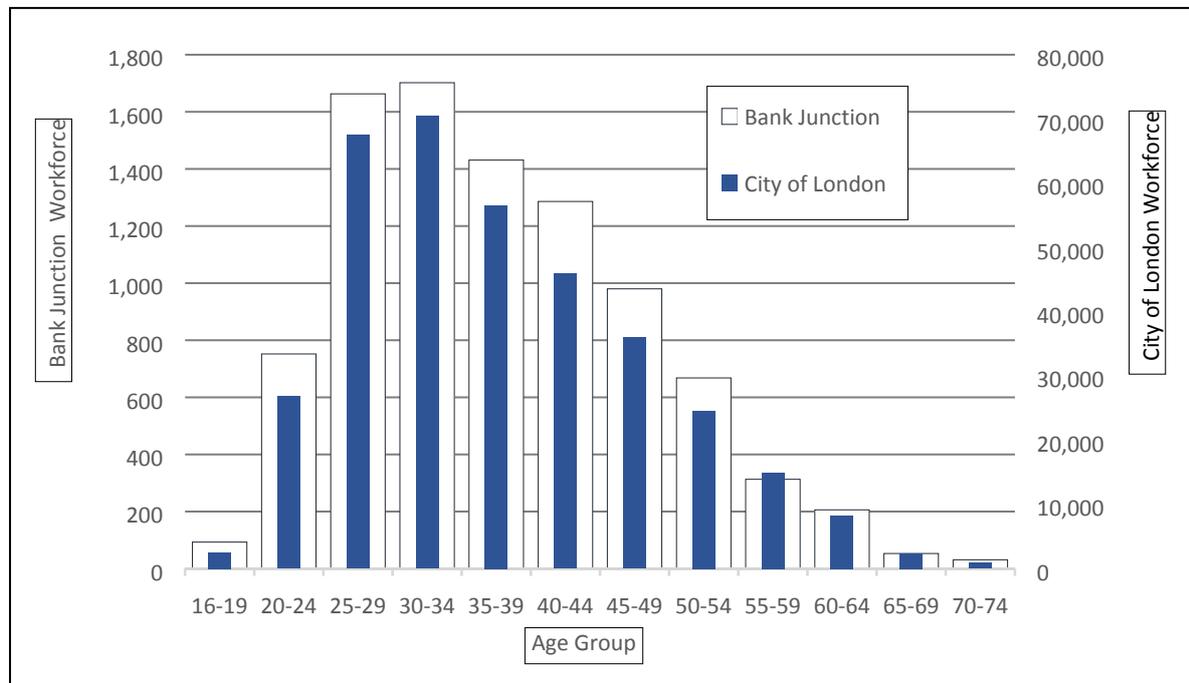
Each of the nine characteristics is assessed in the remainder of this report in the following structure:

- City of London level data for the protected characteristic
- Bank Junction level data for the protected characteristic (The area defined as Bank Junction for the purposes of this analysis is shown in Appendix 1)
- Scheme specific data for the protected characteristic
- Assessment of the impacts to the protected characteristic including any potential mitigation

Protected Characteristic: Age

City of London & Bank Junction Workforce Level Data (combined)

Figure 1: Census 2011 - age of daytime occupants within the Bank Junction Workplace Zone – Figure refers to the area defined in Appendix 1.



Source: Office for National Statistics © Crown Copyright 2014

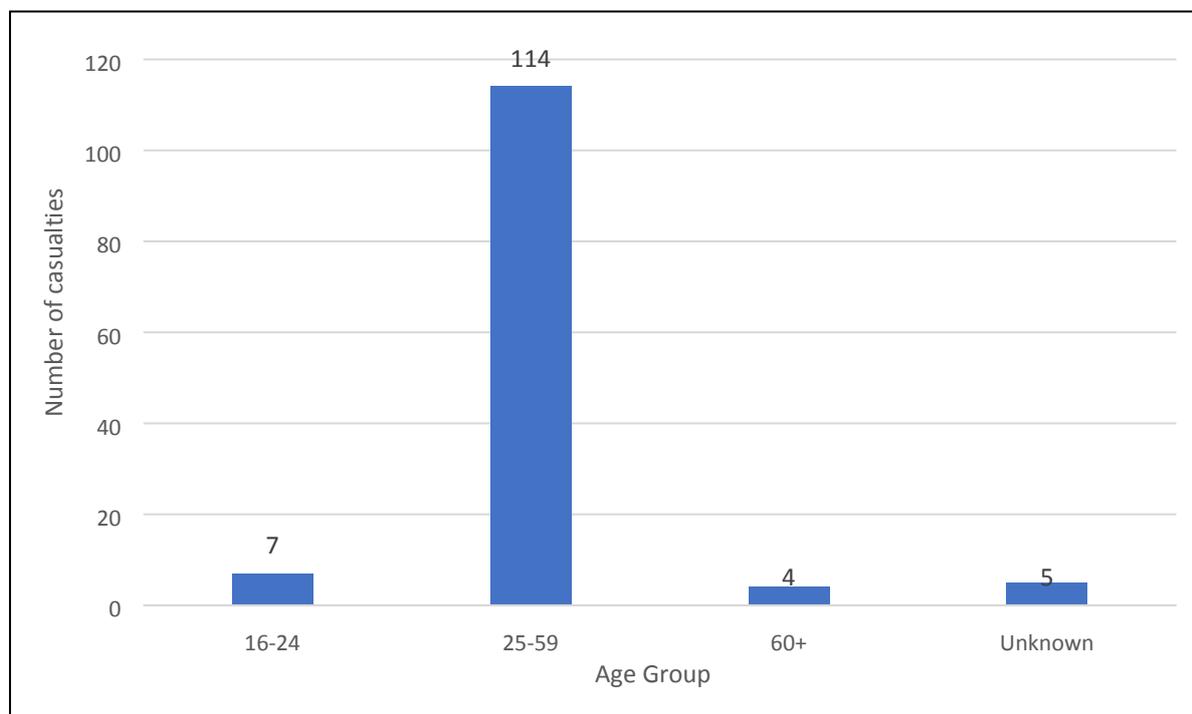
Within the City of London, the Census of Population Workforce for the City of London was 357,000 of which 9,100 was located within the Bank Junction zone.

Figure 2 shows that the age profile for the Bank Junction area is similar to that of the City of London, with the key age group being that of 30-34 and decreasing for each age group to a significantly lower level at the age 55 plus.

The Bank Junction workforce is orientated towards the age range 20 to 59 with a small number of teenagers and elderly people.

Scheme-Specific Data

**Figure 2: Number of casualties by age at Bank Junction over a six-year period (2011-2016)
(STATS19 data, 24 hours, Monday to Sunday)**



Assessment of impact on those with protected characteristic

What is the proposal's impact on the protected characteristic?	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?
<p>Positive impact – Elderly Pedestrians The consultation survey did not specifically identify elderly users however the benefits achieved for other pedestrians (such as a safer road environment) will have also been realised by elderly pedestrians. The consultation findings and responses received to date demonstrate a positive impact on many pedestrians (with the possible exception of some disabled pedestrians) at the junction, with many citing a safer environment and an area which is clearer and safer to cross.</p> <p>Positive impact - Elderly Cyclists Although not specifically identified, through dramatically reducing the volume of traffic at and on approach to Bank Junction, the scheme is considered to have had a positive impact on</p>	<p>Measures undertaken as part of scheme implementation</p> <ul style="list-style-type: none"> - Reduction of vehicles in the junction - Reduced cycle frequency of green phase for pedestrians <p>A report detailing the full monitoring of the scheme was published on 10 April 2018. Overall positive impacts include:</p> <ul style="list-style-type: none"> - a safer environment for pedestrians - a safer environment for cyclists - faster bus journey times for all passengers' - ability to cross the junction and the approach arms is improved with less vehicles travelling through the area.

<p>this group (as per the impact on cyclists in general).</p> <p>Positive impact - Elderly public transport users Early bus journey time data indicates that many bus journeys are quicker through Bank Junction since the introduction of the scheme. (Transport for London’s 2014 Bus User Survey suggest that overall as many as 18% of daytime - use bus passengers are over the age of 65).</p>	
<p>Negative impact – Elderly taxi / private vehicle users</p> <p>The Bank on Safety consultation survey received a small number (0.58% of all respondents) of comments stating that over 65s or elderly people had encountered difficulty in accessing the junction since the Bank on Safety scheme was introduced.</p> <p>The majority of the comments were associated with restricted taxi access to the junction during operational hours.</p> <p>It is acknowledged that if, for example on Cornhill, which during operational hours is effectively eastbound only, a person wished to travel west by vehicle, they would have to divert eastbound first and come back on themselves in a westerly direction on a different street. If in a taxi or private hire vehicle, this may incur an additional cost and journey time increase as the vehicle would not be permitted to cross the junction during the operational times of the restriction. It is therefore acknowledged that it may be more difficult to move between the approach arms of the Junction to be picked up or dropped off by a private vehicle or taxi. It is considered that the advantages of the scheme outweigh the limited diversions which could occur to some journeys and it is not felt that the impacts of the scheme weigh disproportionately on elderly people overall.</p> <p>Appendix 2 also illustrates that the Bank on Safety scheme restriction area broadly mirrors the original junction stop lines and that therefore the scheme is likely to have had little</p>	<p>Measures undertaken as part of scheme implementation</p> <p>Physical Changes</p> <ul style="list-style-type: none"> - Extended taxi rank hours on Cornhill to 24 hours - Introduced a taxi rank on the north-east side of Princes Street outside the Bank of England operating between 7 am and 7 pm - Introduced a taxi rank on the south-east side of Queen Victoria Street outside the Magistrates Court operating between 7 am and 7 pm [N/B this taxi rank has been suspended while highway work has taken place on Queen Victoria Street and to facilitate emergency building work and gas repairs] - Worked with Transport for London to optimise traffic signals to enable traffic to continue to flow in the surrounding area <p>Data</p> <p>Data surrounding taxi journey times and accessibility is presented in the latest version of the Bank on Safety Monitoring report as presented at Committee on 10 April 2018.</p> <p>Taxicard Data</p> <p>Analysis of Taxicard data is presented in Appendix 5 and shows the change in use of taxis and private hire vehicles by those with a severe sensory or mobility impairment.</p>

<p>effect on normal pick up and drop off by taxi at the Junction.</p> <p>Further detail is provided on Licensed Taxi availability in Appendix 4.</p>	<p>Communications</p> <ul style="list-style-type: none"> - Engaged with the taxi and private hire trade to ensure the scheme is publicised with drivers - Awareness raised for the scheme through consultation and engagement with the public and local businesses - For those consultation respondents that have left contact details such as email addresses, officers will make direct contact to discuss any concerns and provide clarification
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Summary of impact on the Protected Characteristic: Age

The overall impact on this protected characteristic within the modelling area is deemed to be neutral, but it is believed that there are a small number of possible negative impacts that could be created during the operational hours of the scheme. However as detailed, it is not felt that these impacts are disproportionate to the positive impacts of the scheme, namely a safer environment for all users including elderly users at the junction. Further, future monitoring and mitigation measures may reduce the negative impacts as the scheme progresses.

Protected Characteristic: Disability

City of London Level Data

In the City of London as a whole, 89% of the resident population 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.

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.

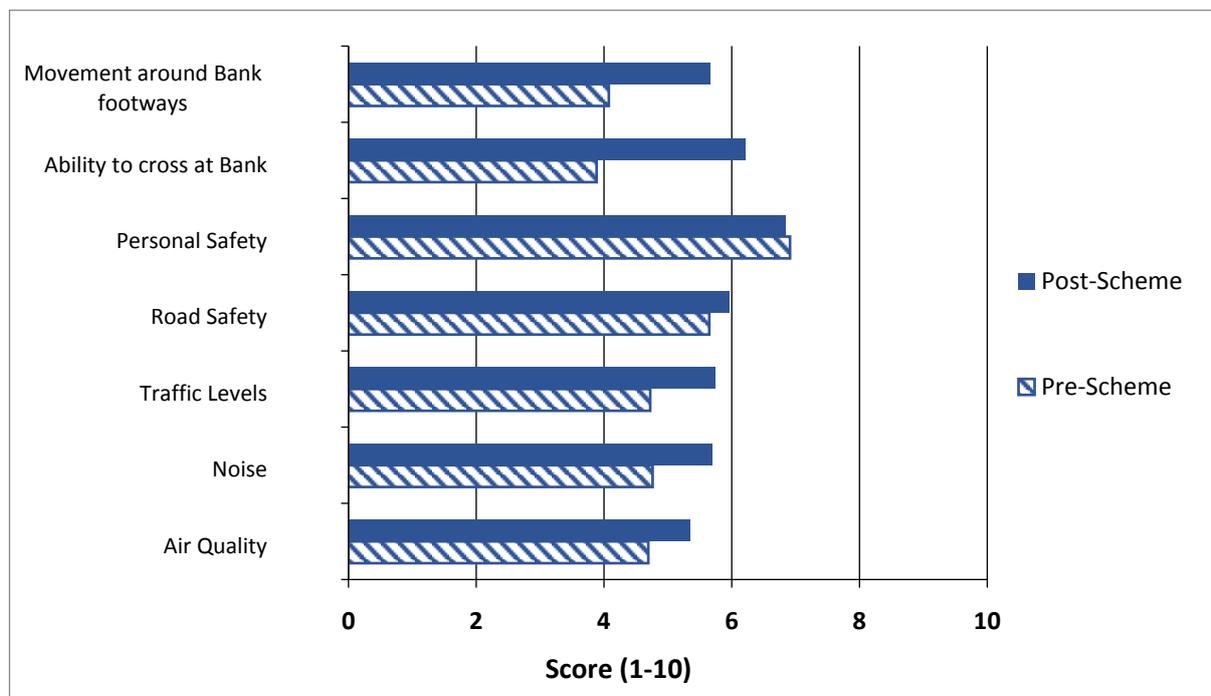
Bank Junction Level Data

No workforce data is available for this protected characteristic and the resident population for the Bank Junction area is too small to identify any trends, as such, the City of London resident population is relied upon.

Scheme-Specific data

While no data was collected specifically on disabled users via the Bank on Safety public consultation exercise, a separate perception survey was fielded which asked respondents whether the respondents considered themselves to have a disability. This survey ran before the scheme was implemented and again after the scheme had been in place for four months, for the purposes of comparison.

Figure 3: Change in disabled users’ perception of Bank Junction (where 0 is negative and 10 is positive)



14 respondents (6.79%) identified as disabled in the pre-scheme survey and 8 respondents (5.21%) identified as disabled in the post-scheme survey. Of the questions that were answered by disabled respondents in both surveys, Figure 4 shows the change in perception of the junction by those identifying as disabled. It should be noted that there were other questions in the survey which were not answered by disabled respondents in both surveys and as such the categories listed are the only ones that can be compared.

Appendices 2 and 3 are relevant to this protected characteristic and show the overall access to the Junction and accessible entrance locations at Bank Junction. Similar maps were presented to the City of London Access Group on 26 July 2017.

The Department for Transport sets minimum distances for the location of parking bays. As pedestrians, many disabled people will have a limited mobility range and will require specially designated parking bays closer to the places they wish to visit. Whether on-street or off-street, parking bays for disabled people should not be further from major destinations (eg bank, post office, large store or supermarket) than shown in Table 1. The Bank on Safety scheme does not push the distances from parking bays in and around the area over the thresholds shown in Table 1.

Table 1: recommended maximum walking distance without a rest according to disability, ‘walking’ includes travel by wheelchair

Disability	Distance (metres)
Visually impaired	150
Wheelchair users	150
Ambulatory without walking aid	100
Stick users	50

Assessment of impact to the protected characteristic

What is the proposal’s impact on the protected characteristic?	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?
<p>Positive impact – Disabled Pedestrians The consultation survey did not specifically identify disabled users however the benefits achieved for other pedestrians (such as a safer road environment) will have also been realised by disabled pedestrians. The consultation findings and responses received to date demonstrate a positive impact on many pedestrians (with the possible exception of some disabled pedestrians) at the junction, with many citing a safer environment and an area which is clearer and safer to cross.</p>	<p>Measures undertaken as part of scheme implementation</p> <ul style="list-style-type: none"> - Reduction of vehicles in the junction - Reduced cycle frequency of green phase for pedestrians <p>A report detailing the full monitoring of the scheme as presented at Committee on 10 April 2018. Overall positive impacts include:</p> <ul style="list-style-type: none"> - a safer environment for pedestrians - a safer environment for cyclists

<p>Positive impact - Disabled cyclists</p> <p>Although not specifically identified, through dramatically reducing the volume of traffic at and on approach to Bank Junction, the scheme is considered to have had a positive impact on this group (as per the impact on cyclists in general).</p> <p>Positive impact - Disabled public transport users</p> <p>Early bus journey time data indicates that many bus journeys are quicker through Bank Junction since the introduction of the scheme. (Transport for London’s 2014 Bus User Survey suggest that overall as many as 10% of daytime - use bus passengers have a disability that limits their daily activities).</p>	<ul style="list-style-type: none"> - faster bus journey times for all - passengers’ ability to cross the junction and the approach arms is improved with less vehicles travelling through the area.
<p>Neutral Impact – Disabled Pedestrians</p> <p>A new pedestrian refuge island was introduced on Threadneedle Street, with dropped kerbs and adjusted utility cover levels to provide for wheelchair access. This replaced an existing zebra crossing further to the east.</p> <p>In meetings between City of London officers and RNIB representatives, the RNIB raised no particular concerns about the Bank on Safety scheme itself but would like to see improved crossing facilities should infrastructure changes be made in the future.</p>	<p>Measures undertaken as part of scheme implementation</p> <ul style="list-style-type: none"> - Proposal reviewed with City of London Access Manager - Implemented new pedestrian refuge island - Should the scheme be made permanent, recommendations provided as part of the Living Streets Pedestrian review of Bank Junction could be implemented to mitigate any negative impacts to disabled pedestrians that may emerge.
<p>Negative Impact – Disabled parking bay users</p> <p>While the Blue Badge Scheme does not fully apply in the City, allocated parking in the Square Mile is provided for people with disabilities under the red badge scheme.</p> <p>The Red Badge Scheme provides extra parking facilities within the City of London for City residents and workers with disabilities.</p> <p>Badge holders can park:</p> <ul style="list-style-type: none"> • At Pay & Display bays and disabled bays without charge or time limit 	<p>Measures undertaken as part of scheme implementation</p> <ul style="list-style-type: none"> - Following consultation parking bays relocated <p>Measures to be undertaken</p> <ul style="list-style-type: none"> - Continue to consult with businesses to understand user demand of the bays - Update information on the City of London website regarding disabled persons parking bays in the Bank area

<ul style="list-style-type: none"> On a single yellow line for up to 30 minutes <p>Through early engagement with businesses and regular use surveys it was decided that two of three disabled parking bays located on Bartholomew Lane should be relocated to Cornhill provide a better level of service to its users. This change created a net loss of one parking bay.</p> <p>A plan of this relocation is presented within Appendix 3.</p>	
<p>Negative Impact – Disabled taxi passengers</p> <p>The Bank on Safety public consultation exercise revealed that 2% of all respondents to the public consultation exercise believed that taxi access for disabled passengers was not working well (further information can be found at the link provided on page 6 of this document). This was stated by both taxi drivers and taxi passengers.</p> <p>Similar maps to those shown in Appendices 2 and 3 were presented to City of London Access Group by officers and illustrates that the Bank on Safety scheme restriction area broadly mirrors the original junction stop lines. the scheme therefore has had little effect on the normal physical access by taxi close to the junction for disabled users.</p> <p>It is acknowledged that if, for example on Cornhill, which during operational hours is effectively eastbound only, a person wished to travel west by vehicle, they would have to divert eastbound first and come back on themselves in a westerly direction on a different street. If in a taxi or private hire vehicle, this may incur an additional cost and journey time increase as the vehicle would not be permitted to cross the junction during the operational times of the restriction. It is therefore acknowledged that it may be more difficult to move between the approach arms of the Junction to be picked up or dropped off by a private vehicle or taxi. It is considered that the advantages of the scheme outweigh the</p>	<p>Measures undertaken as part of scheme implementation</p> <p>Physical Changes</p> <ul style="list-style-type: none"> Extended taxi rank hours on Cornhill to 24 hours Introduced a taxi rank on the north-east side of Princes Street outside the Bank of England operating between 7 am and 7 pm Introduced a taxi rank on the south-east side of Queen Victoria Street outside the Magistrates Court operating between 7 am and 7 pm [N/B this taxi rank has been suspended while highway work has taken place on Queen Victoria Street and to facilitate emergency building work and gas repairs] Worked with Transport for London to optimise traffic signals to enable traffic to continue to flow in the surrounding area <p>Data</p> <p>Data surrounding taxi journey times and accessibility is presented in the latest version of the Bank on Safety Monitoring report as presented at Committee on 10 April 2018.</p> <p>Taxicard Data</p> <p>Analysis of Taxicard data is presented in Appendix 5 and shows the change in use of taxis and private hire vehicles by those with a severe sensory or mobility impairment.</p>

limited diversions and increases in journey time which could occur to some journeys and it is not felt that the impacts of the scheme weigh disproportionately on disabled people.

Appendix 2 also illustrates that the Bank on Safety scheme restriction area broadly mirrors the original junction stop lines and that therefore the scheme is likely to have had little effect on normal pick up and drop off by taxi at the Junction.

Further detail is provided on Licensed Taxi availability in Appendix 4.

Communications

- Engaged with the taxi and private hire trade to ensure the scheme is publicised with drivers
- Awareness raised for the scheme through consultation and engagement with the public and local businesses
- For those consultation respondents that have left contact details such as email addresses, officers will make direct contact to discuss any concerns and provide clarification

Summary of impact on the Protected Characteristic: Disability

The overall impact on this protected characteristic within the modelling area is deemed to be neutral, but it is believed that there are possible negative impacts that could have been created during the operational hours of the scheme. However as detailed above, it is not felt that these impacts are disproportionate to the positive impacts of the scheme, namely a safer environment for all users, including disabled users at the junction. Furthermore, future monitoring and mitigation measures may reduce the negative impacts as the scheme progresses.

Protected Characteristic: Pregnancy and Maternity

City of London Level Data

Conception

*within ONS datasets, to preserve confidentiality, counts for the City of London are combined with Hackney.

Table 2: Conception rates in the City of London & Hackney in 2015 (latest dataset available)

Number	Conception rate per 1,000	Percentage of conceptions
6,095	80.5	25.80%

Bank Junction Level Data

No data is available at this level for this protected characteristic.

Scheme-Specific Data

No data is available at this level for this protected characteristic.

Assessment of impact to the protected characteristic

What is the proposal's impact on the protected characteristic?	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?
<p>Positive impact – Pregnant pedestrians As per consultation findings and responses received to date the Bank on Safety scheme is considered to have had a positive impact on many pedestrians at the junction, with many citing a safer environment and an area which is clearer and safer to cross. As stated the consultation survey did not include an option for pregnant users but it is assumed that the benefits for all pedestrians (such as a safer road environment) have also been realised by pregnant pedestrians.</p> <p>Positive impact - Pregnant cyclists Through dramatically reducing the volume of traffic at and on approach to Bank Junction, the scheme is considered to have had a positive impact on this group as per the impact on cyclists in general.</p>	<p>Measures undertaken as part of scheme implementation</p> <ul style="list-style-type: none"> - Reduction of vehicles in the junction - Reduced cycle frequency of green phase for pedestrians <p>A report detailing the full monitoring of the scheme was published on 10 April 2018. Indications suggest overall positive impacts include:</p> <ul style="list-style-type: none"> - a safer environment for pedestrians - a safer environment for cyclists - faster bus journey times for all passengers' - ability to cross the junction and the approach arms is improved with less vehicles travelling through the area.
<p>Negative impact - pregnant taxi / private vehicle users</p>	<p>Measures undertaken as part of scheme implementation</p>

The Bank on Safety public consultation exercise revealed that one taxi driver had encountered difficulty whilst attempting to access Bank Junction and drop off a pregnant passenger.

Physical Changes

- Extended taxi rank hours on Cornhill to 24 hours
- Introduced a taxi rank on the north-east side of Princes Street outside the Bank of England operating between 7 am and 7 pm
- Introduced a taxi rank on the south-east side of Queen Victoria Street outside the Magistrates Court operating between 7 am and 7 pm [N/B this taxi rank has been suspended while highway work has taken place on Queen Victoria Street and to facilitate emergency building work and gas repairs]
- Work with Transport for London to optimise traffic signals to enable traffic to continue to flow in the surrounding area

Data

Data surrounding taxi journey times and accessibility is presented in the latest version of the Bank on Safety Monitoring report as presented at Committee on 10 April 2018.

Communications

- Engaged with the taxi and private hire trade to ensure the scheme is publicised with drivers
- Awareness raised for the scheme through consultation and engagement with the public and local businesses
- For those consultation respondents that have left contact details such as email addresses, officers will make direct contact to discuss any concerns and provide clarification.

Summary of impact on the Protected Characteristic: Pregnancy and Maternity

The overall impact on this protected characteristic within the modelling area is deemed to be neutral, but it is believed that there are possible negative impacts that could have been created during the operational hours of the scheme. However as detailed above, it is not felt that these impacts are disproportionate to the positive impacts of the scheme, namely a safer environment for

all users, including pregnant users of the junction. Furthermore, future monitoring and mitigation measures may reduce the negative impacts as the scheme progresses.

Protected Characteristic: Race

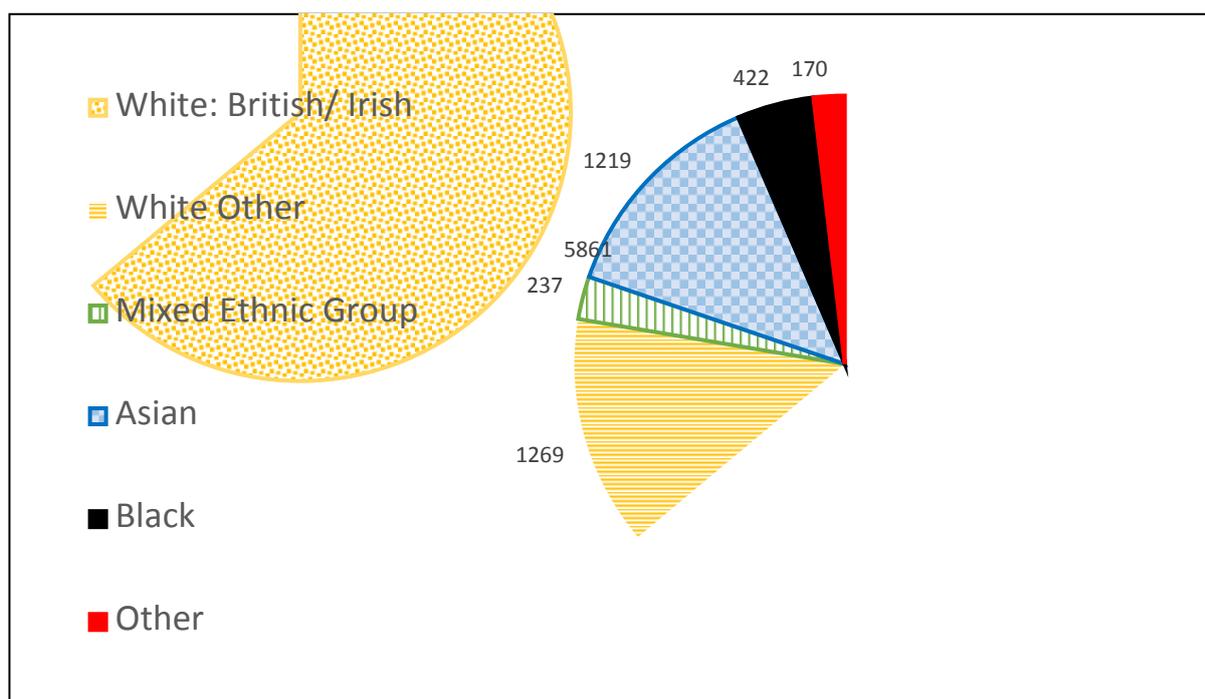
City of London Level Data

The City of London 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 resident 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 percentage 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%.

Bank Junction Level Data

Figure 4: Ethnic Group Profile of the Bank Junction Zone Workforce



Source: Office for National Statistics © Crown Copyright 2014

Scheme-Specific Data

No data is available at this level for this protected characteristic.

Assessment of impact to the protected characteristic

What is the proposal's impact on the protected characteristic?	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?
No evidence of impact to race was discovered as part of the Bank on Safety public consultation survey and other engagement exercises conducted by the City of London.	N/A

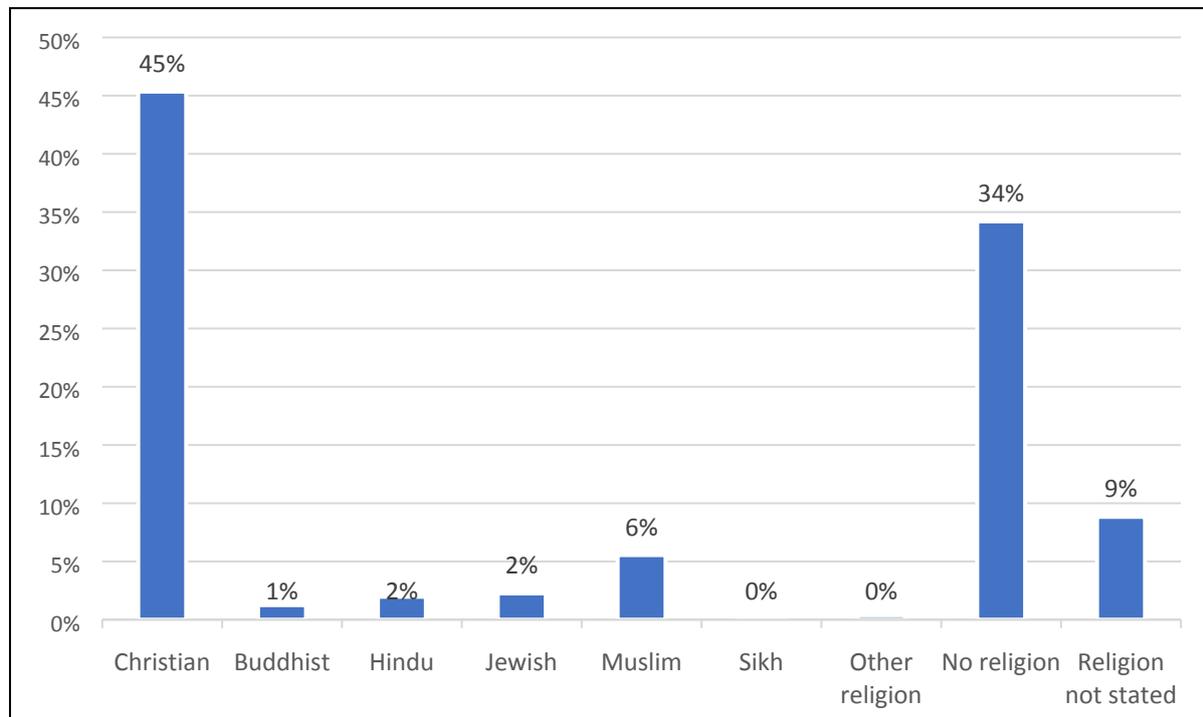
Summary of impact on the Protected Characteristic: Race

The overall impact on this protected characteristic within the modelling area is deemed to be neutral.

Protected Characteristic: Religion or Belief

City of London Level Data

Figure 5: Census 2011 Religion or belief of City of London Resident Population



Bank Junction Level Data

Scheme-Specific Data

No data is available at this level for this protected characteristic.

Assessment of impact to the protected characteristic

What is the proposal's impact on the protected characteristic?	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?
No evidence of impact to Religion or Belief was discovered as part of the Bank on Safety public consultation survey and other engagement exercises conducted by the City of London.	N/A

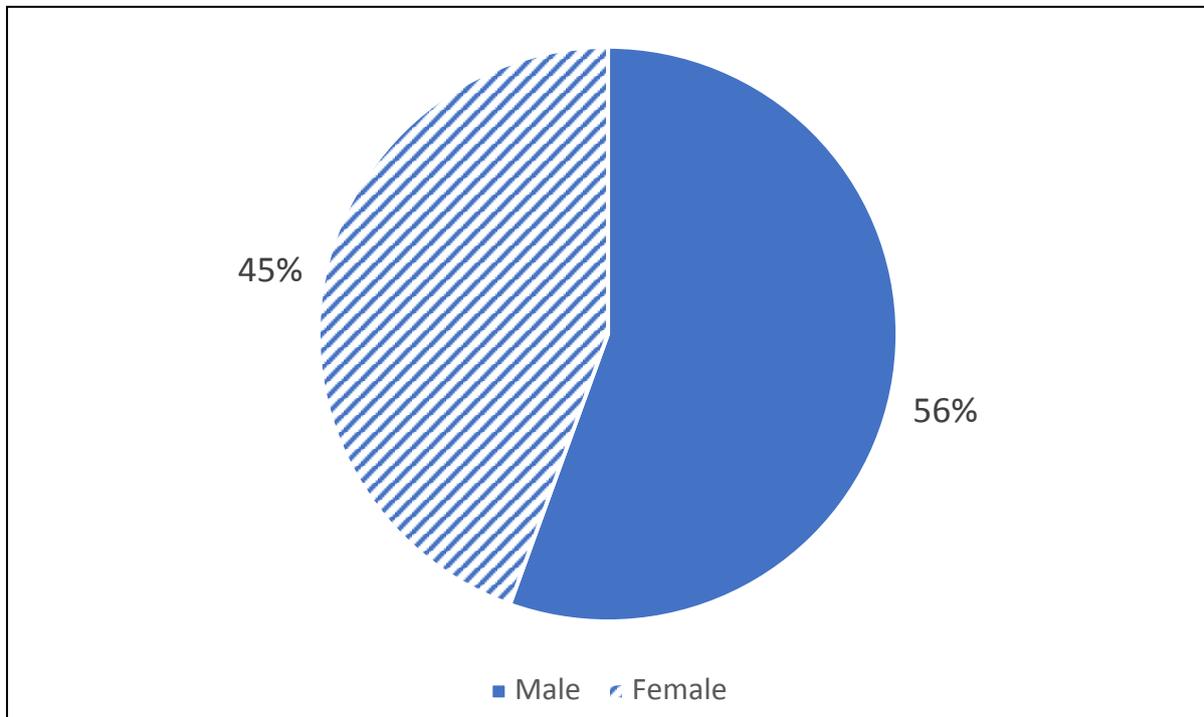
Summary of impact on the Protected Characteristic: Religion or Belief

The overall impact on this protected characteristic within the modelling area is deemed to be neutral.

Protected Characteristic: Sex

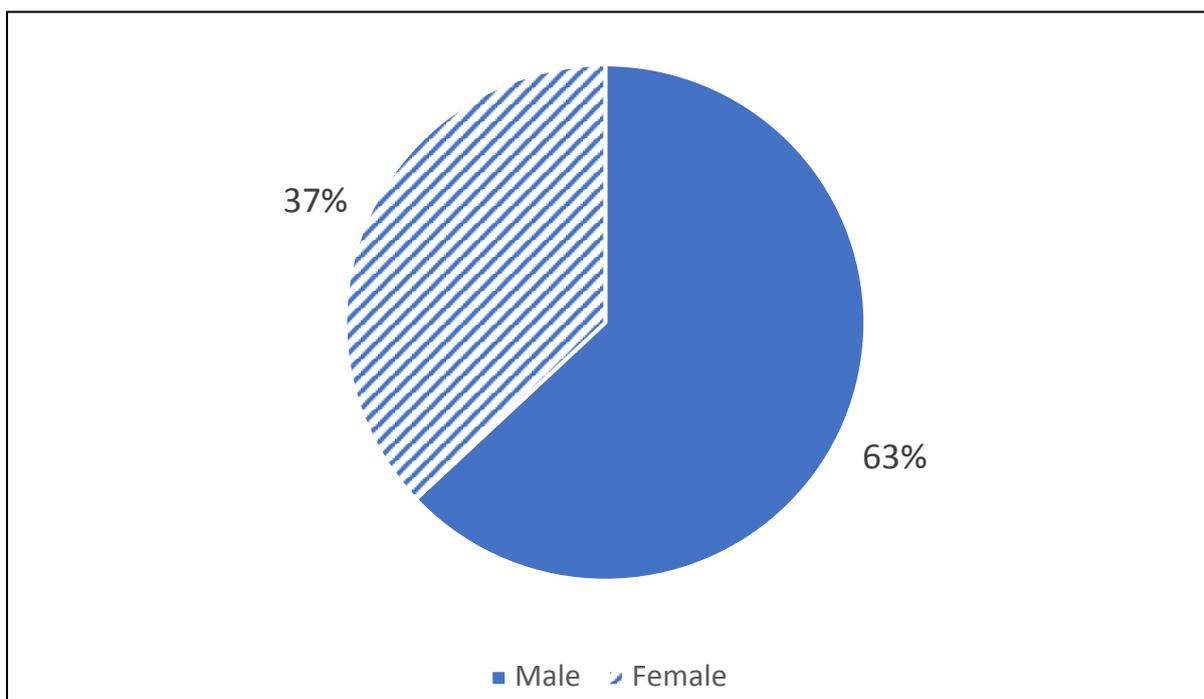
City of London Level Data

Figure 6: Census 2011 Split of Residents by Sex



Bank Junction Level Data

Figure 7: Sex of daytime occupants within the Bank Junction Workplace Zone – Figure refers to the area defined in Appendix 1.



Scheme-Specific Data

No data is available at this level for this protected characteristic.

Assessment of impact to the protected characteristic

What is the proposal's impact on the protected characteristic?	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?
No evidence of impact to Sex was discovered as part of the Bank on Safety public consultation survey and other engagement exercises conducted by the City of London.	N/A

Summary of impact on the Protected Characteristic: Sex

The overall impact on this protected characteristic within the modelling area is deemed to be neutral.

Protected Characteristic: Sexual Orientation and Gender Reassignment

City of London Level Data

No data is available at this level for this protected characteristic.

Bank Junction Level Data

No data is available at this level for this protected characteristic.

Scheme-Specific Data

No data is available at this level for this protected characteristic.

Assessment of impact to the protected characteristic

What is the proposal's impact on the protected characteristic?	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?
No evidence of impact to Sexual Orientation and Gender Reassignment was discovered as part of the Bank on Safety public consultation survey and other engagement exercises conducted by the City of London.	N/A

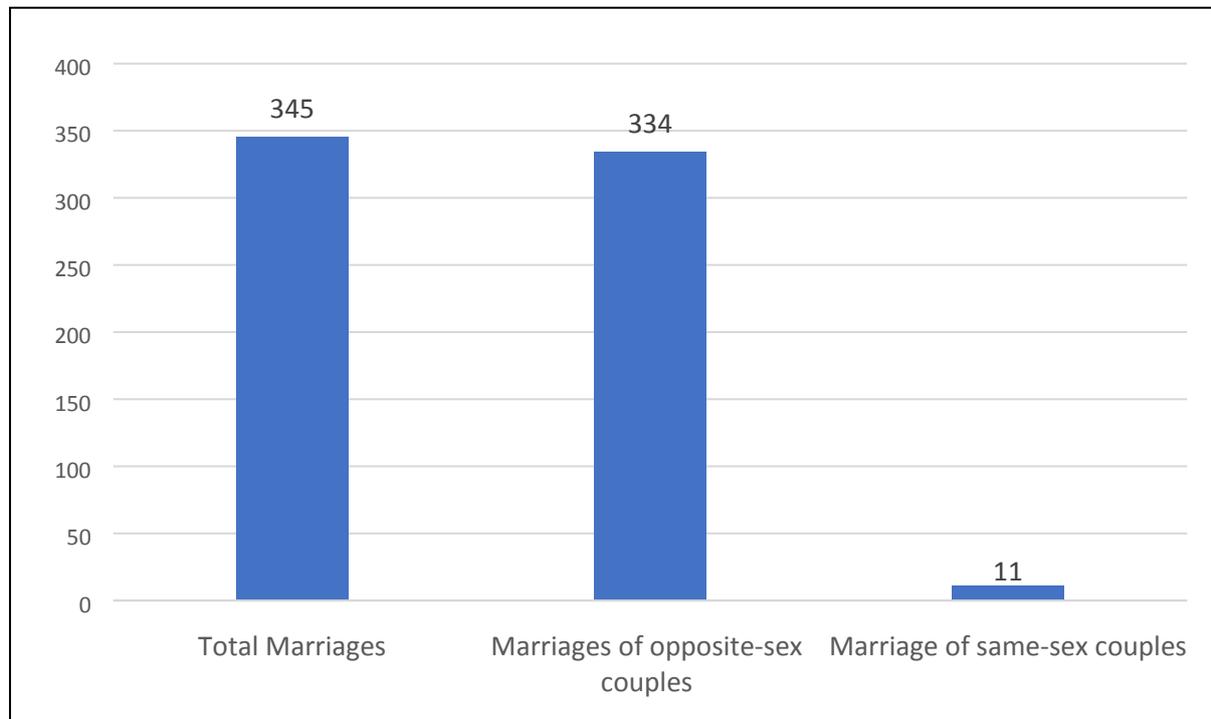
Summary of impact on the Protected Characteristic: Sexual Orientation and Gender Reassignment

The overall impact on this protected characteristic within the modelling area is deemed to be neutral.

Protected Characteristic: Marriage and Civil Partnership

City of London Level Data

Figure 8: ONS 2015: Marriages and Civil Partnerships in the City of London



Bank Junction Level Data

No data is available at this level for this protected characteristic.

Scheme-Specific Data

No data is available at this level for this protected characteristic.

Assessment of impact to the protected characteristic

What is the proposal's impact on the protected characteristic?	What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?
No evidence of impact to Marriage and Civil Partnership was discovered as part of the Bank on Safety public consultation survey and other engagement exercises conducted by the City of London.	N/A

Summary of impact on the Protected Characteristic: Marriage and Civil Partnership

The overall impact on this protected characteristic within the modelling area is deemed to be neutral.

Section Six: Summary of Impacts to the Protected Characteristics

As detailed in Section Five, Table 4 below provides a summary of the impacts to each protected characteristic.

Table 3: Summary of impacts to protected characteristics

	= neutral with possible negative impacts which can be mitigated
	= neutral with no impact
	= negative impact that cannot be mitigated

Protected Characteristic	Impact rating
Age	
Disability	
Gender Reassignment	
Marriage and Civil Partnership	
Pregnancy and maternity	
Race (Ethnicity)	
Religion and Belief	
Sexual Orientation	

As demonstrated in Table 4 there are three protected characteristics which are deemed to have possible negative impacts as a result of the Bank on Safety scheme, however it is reasoned that there are measures which can be undertaken to mitigate these impacts. Further details on mitigation measures are presented in Section Five of the report, however these are summarised in Table 4 below;

Table 4: Summary of mitigations to protected characteristics

	Protected Characteristic		
	Age	Disability	Pregnancy and Maternity
Proposed Mitigations	<p>In addition to the physical changes made as part of scheme implementation officers intend to;</p> <ul style="list-style-type: none"> Continue to monitor key performance data including Taxicard data Continue to engage with the taxi trade Raise awareness through publications Meet with representatives of Age-UK to outline scheme-specific adjustments 	<p>In addition to the physical changes made as part of scheme implementation officers intend to;</p> <ul style="list-style-type: none"> Continue to monitor key performance data including Taxicard data Continue to engage with the taxi trade Raise awareness through publications Meet with representatives of RNIB to outline scheme-specific adjustments 	<p>In addition to the physical changes made as part of scheme implementation officers intend to;</p> <ul style="list-style-type: none"> Continue to monitor key performance data including Taxicard data Continue to engage with the taxi trade Raise awareness through publications

Section Seven: Next Steps

In combination with the final iteration of the Bank on Safety monitoring report and an officer's recommendation report, the outcomes of the Equalities Analysis will be used to inform the ultimate decision on whether to make the Bank on Safety Scheme permanent.

In addition to informing any final decision, the impacts identified in this report will continue to be monitored by officers on an ongoing basis and engagement with key stakeholders

Annex One: What is an Equalities 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 equality 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 this equality analysis are to:

- Identify opportunities for action to be taken to advance equality 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;
- Encourage greater openness and public involvement.

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 services homogeneous 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 changes that lead to service improvements are important. If it is not possible to mitigate against any identified negative impact, then clear justification should be provided for this.

By undertaking an 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 resources more effectively
- Identify direct or indirect discrimination in current policies and services and improve them by removing or reducing barriers to equality

Annex Two: Statutory Consultation

The Statutory Consultation process is the formal procedure for feedback or objection on the detail and content of the experimental traffic orders themselves. The below timeline shows how this consultation was advertised and managed by the City of London:

April 2017: Fifteen letters concerning the experimental traffic order were sent directly to the City of London Police, Freight Transport Association, Road Haulage Association, London Transport Buses, Dowgate Fire Station, London Ambulance Service, London Cycling Campaign, London Cab Ranks Committee, London Taxi Drivers Association, City Property Association, Radio Taxis, Cyclist Tourist Club, London Tourist Coach Operators Association and RMT Taxis.

May 2017: Notice of the experimental traffic orders was published in CityAM and London Gazette. City of London website for experimental traffic order goes live.

November 2017: The experimental traffic order consultation for the main restriction closes with 25 formal responses.

February 2018: the experimental traffic order for the loading changes consultation closes with zero responses.

Public Consultation

May 2017: Information towers were placed in two locations at Bank for eight weeks. Over 600 emails were sent to members of the public wishing to be contacted when the consultation went live, as well as City of London Members. Responses to frequently asked questions regarding the consultation are drafted and distributed to the City of London Parking Ticket Office, City of London website and Call Centre.

May 2017 – November 2017: Local businesses who were engaged with prior to Bank on Safety going live receive a follow up email/letter inviting them to meet with the Project Team on how they were operating since implementation, 24 businesses were individually met with. Direct meetings were also taken with taxi, cyclist and pedestrian interest groups. In total, around 507 emails from individuals and organisations were received and responded to regarding the scheme and/or consultation. The public consultation was advertised in CityAM, City Matters and City Resident Magazine. Twitter was also utilised with tweets from highly followed accounts: the City of London, Square Highways, interest groups and high-profile accounts (Val Shawcross and Will Norman).

July 2017 – November 2017: The Public consultation survey was live, 2000 cards advertising the consultation were distributed to visitors, businesses, local workers, churches and residents. Several specific sessions were held to hand out consultation cards to pedestrians at peak traffic times.

September 2017: A letter detailing the consultation and consultation sessions was mailed and couriered to 3000 businesses and residents.

September 2017 – November 2017: Several consultation events were held at locations including: One New Change, St Stephen’s Walbrook Church and the Bank of England.

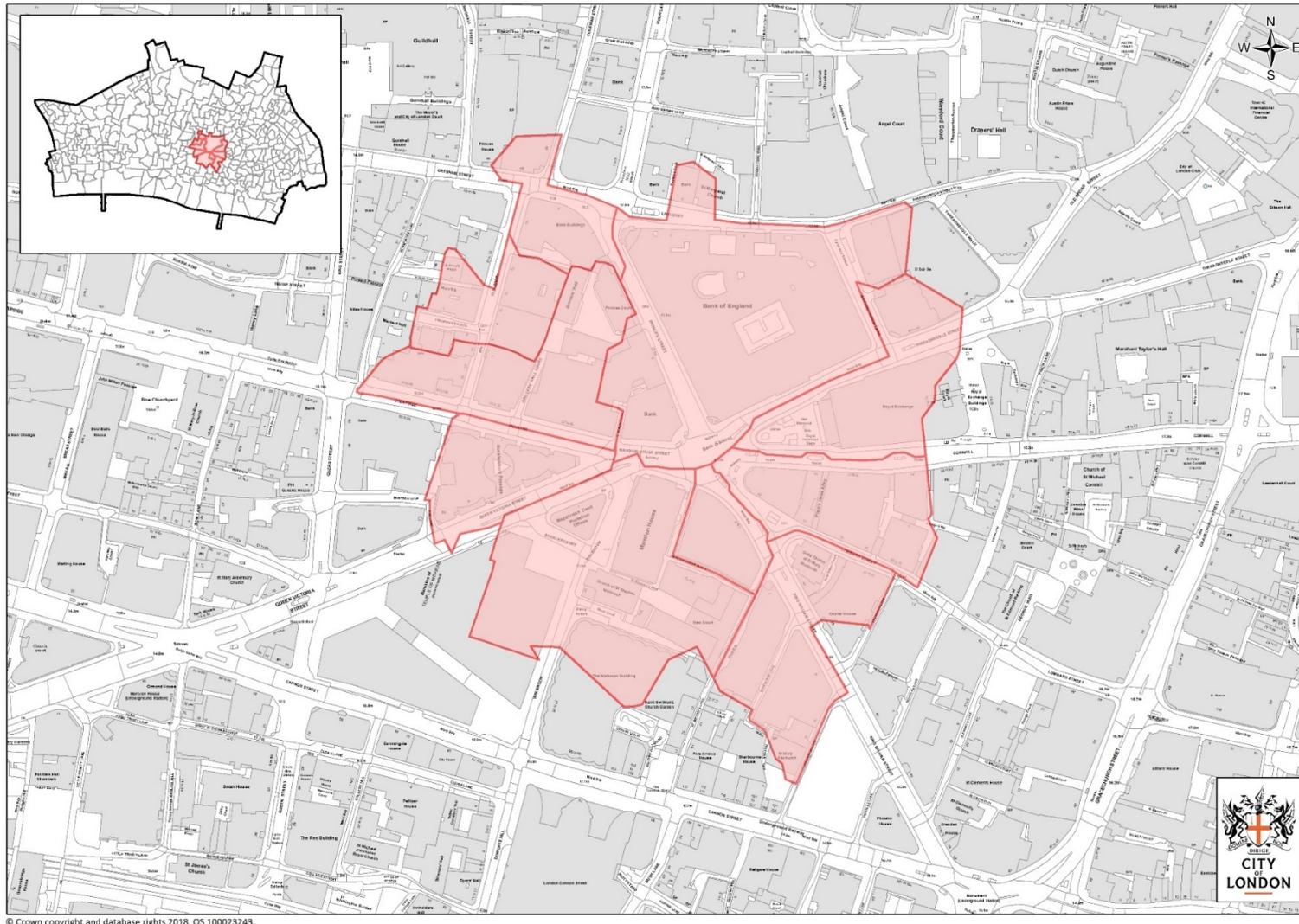
November 2017: Public consultation survey closes with 3730 completed responses.



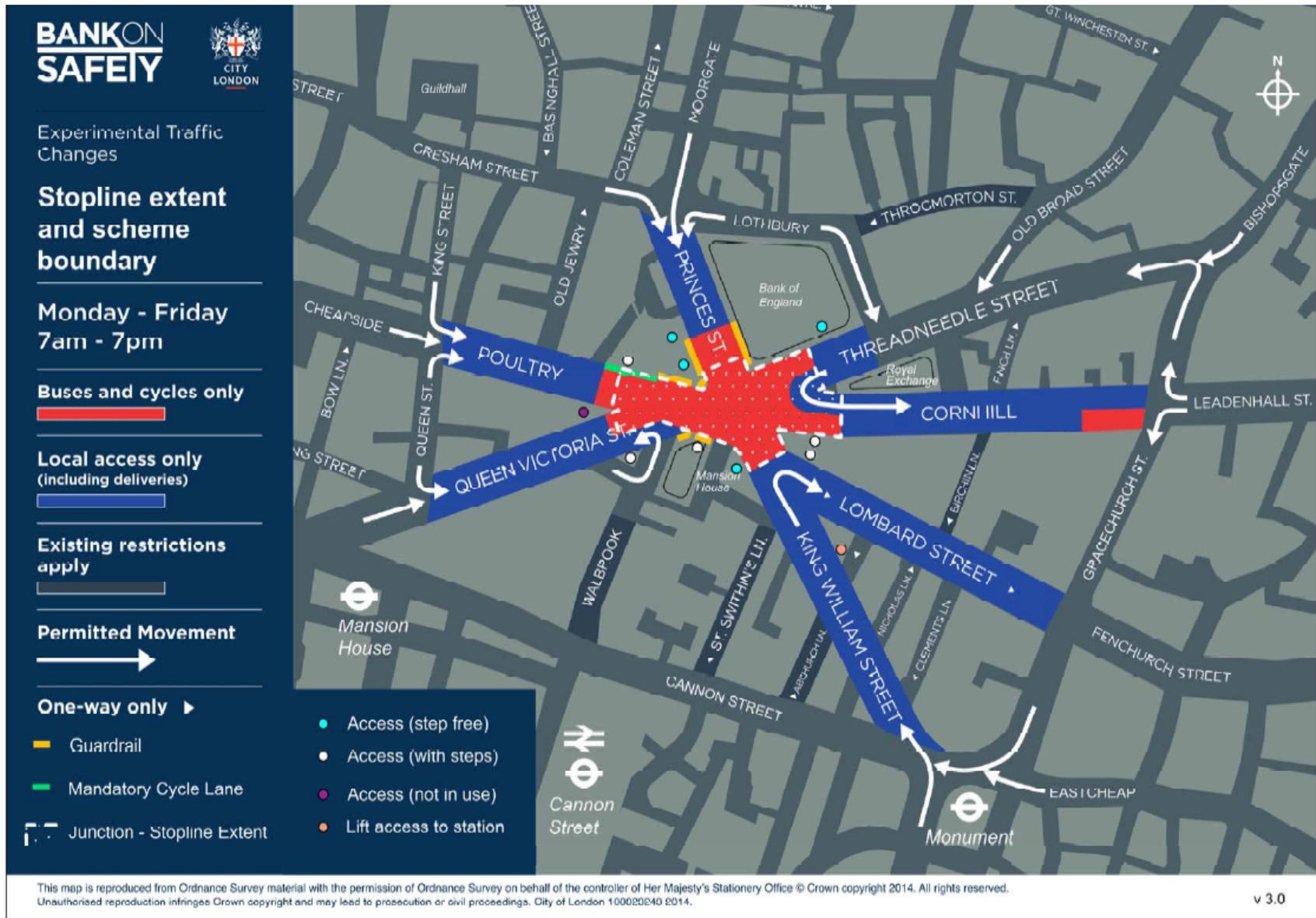
Figure 9: Bank on Safety public engagement event

Section Eight: Appendices

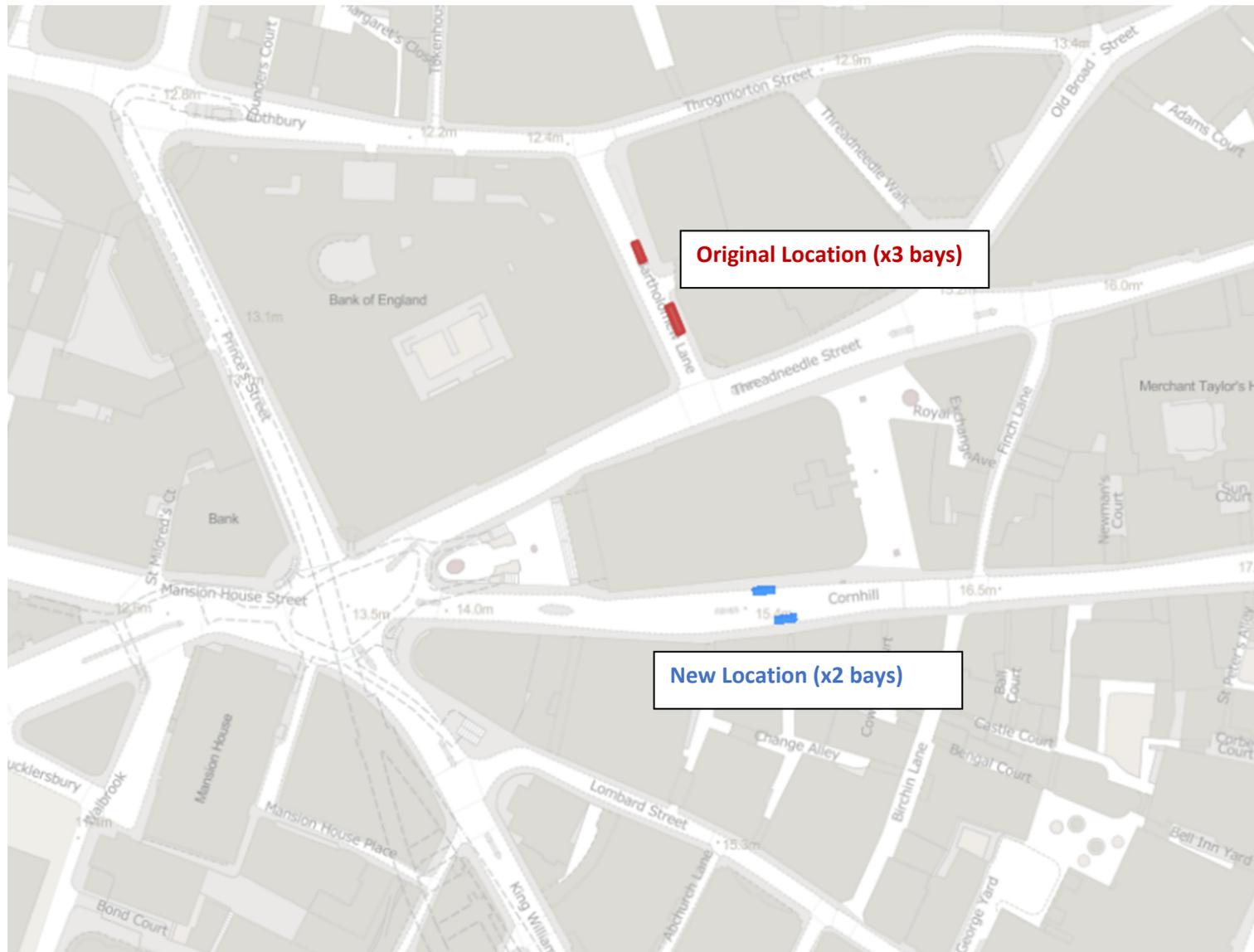
Appendix 1 – Area Defined as ‘Bank Workplace Zone’ for data analysis purposes



Appendix 2 – Map showing: Bank Junction Stopline Extent, Bank on Safety Scheme Boundary, Accessible Entrance Locations and building accesses.



Appendix 3 – Indicative Relocation of Disabled Parking Bays from Bartholomew Lane to Cornhill



Appendix 4 - Licensed Taxi availability

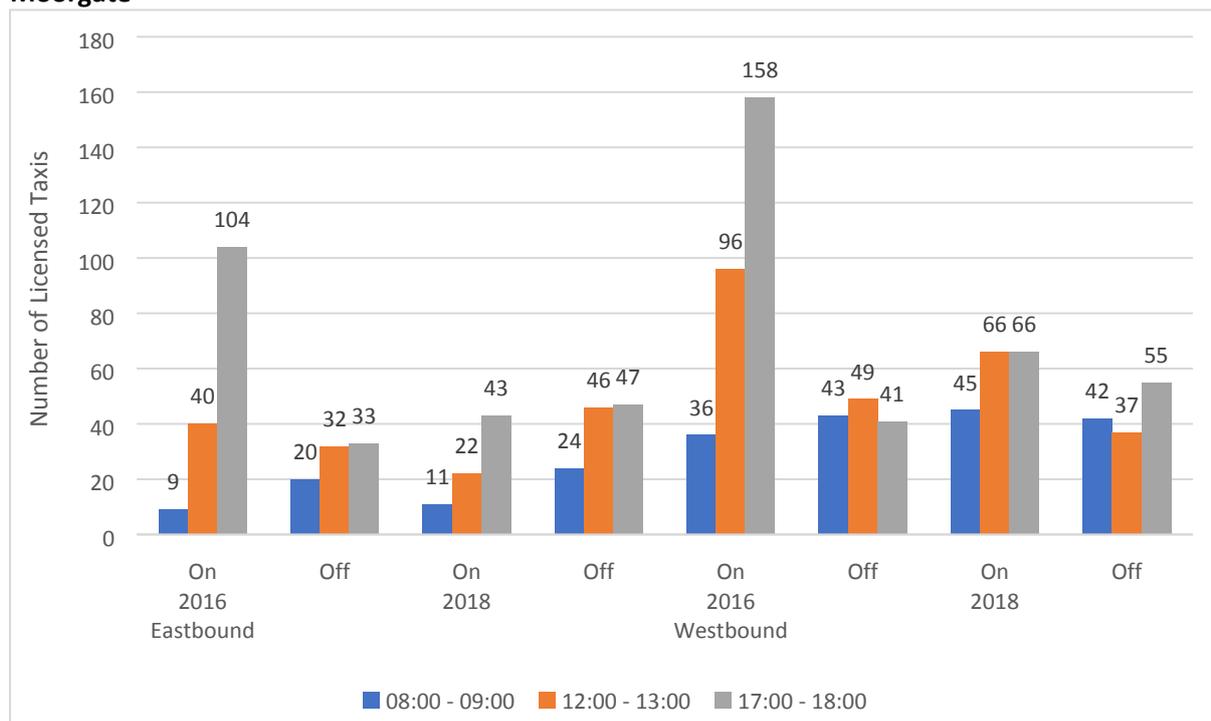
As part of the City of London’s ongoing monitoring of the changes brought about by the Bank on Safety Scheme, the April 2017 Monitoring Strategy stated that the ability to hail a taxi should not be unreasonably worsened by the implementation of the scheme. Access to Licensed Taxis and private hire vehicles in the vicinity of Bank Junction has been raised in the public consultation exercise and by City of London Access Group members.

The original intention of officers was to undertake two sets of surveys – one before the scheme was implemented and one after the scheme was implemented (and traffic behaviour had sufficiently re-adjusted), to give an accurate picture of the change to taxi availability.

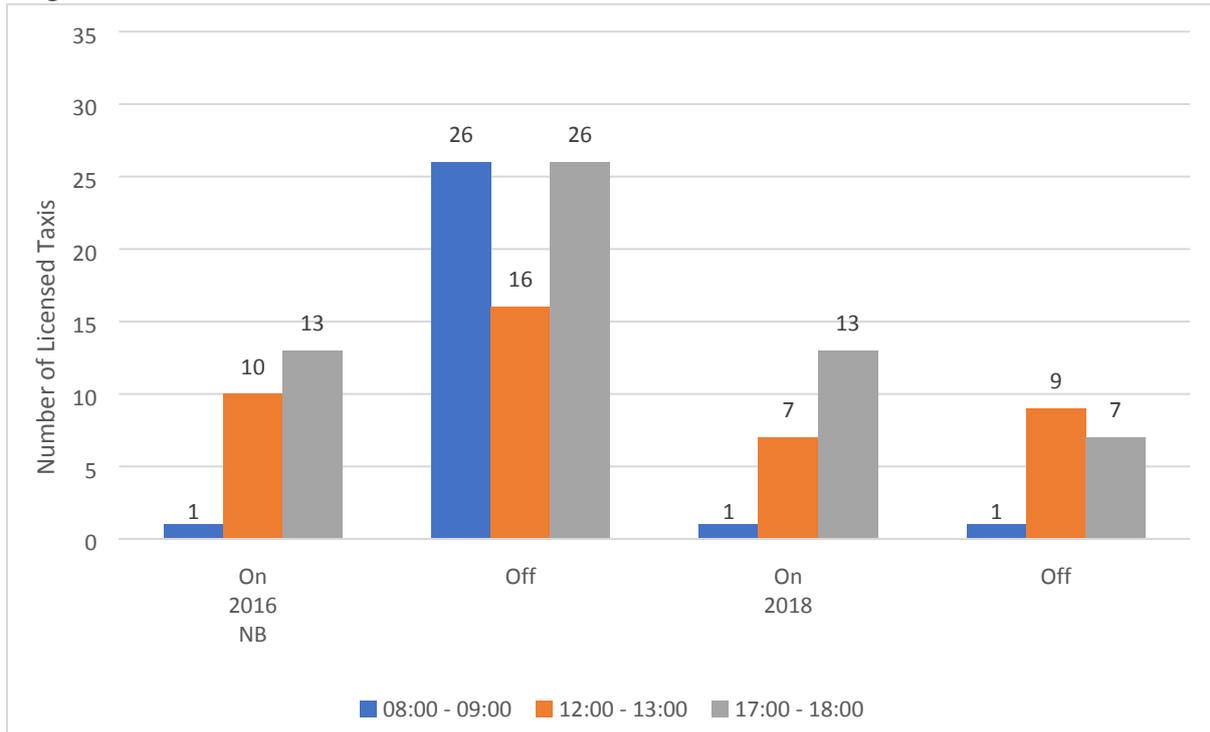
Pre-Scheme Surveys were undertaken in March 2016 by Nationwide Data Collection across a total of 17 sites at Bank Junction and in the surrounding area. The surveys were due to be repeated in March of 2018 in the same locations, however in late January 2018 Cannon Street was closed to traffic due to emergency gasworks. At the time of writing, the works have resulted in a full eastbound closure of Cannon Street, a partial closure of Monument Junction, and the partial re-opening of Bank Junction to traffic via Queen Victoria Street only. It is expected that the current network operation will extend into Autumn 2018, i.e. beyond the date of the final decision on whether to make the Bank on Safety Scheme permanent.

Repeating the surveys under current network operation would not give an accurate reflection of the changes to Licensed Taxi Availability caused by the Bank on Safety Scheme and would most likely mean that a higher availability of Licensed Taxis would be indicated than otherwise (due to Licensed taxis using Queen Victoria Street in higher volumes). Officers intend to repeat these surveys as soon as the Bank on Safety Scheme is operating as normal, however in the interim, spot checks were undertaken by officers on a number of key sites around Bank Junction in April 2018. The findings of these site surveys are summarised below. It should be noted that the counts displayed below are of Licensed Taxis only (i.e. black cabs), split by whether vehicles were driving with their lights on or off.

Moorgate

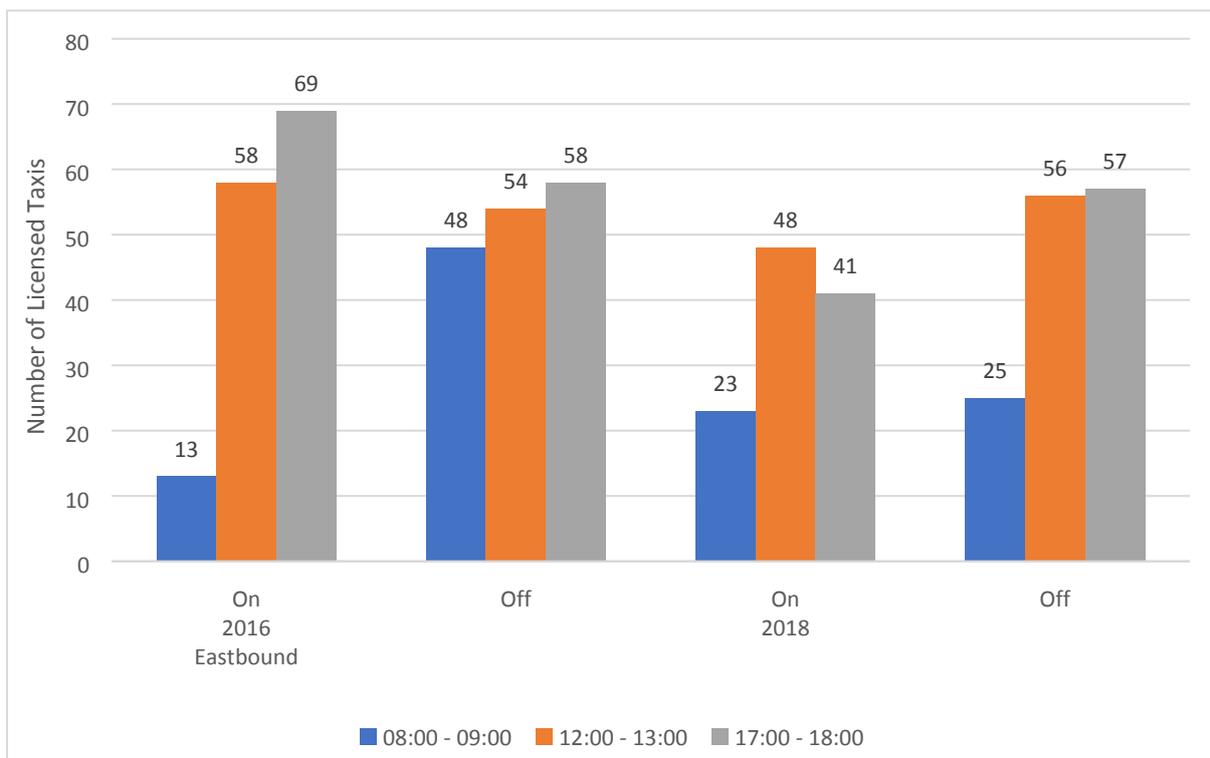


King William Street



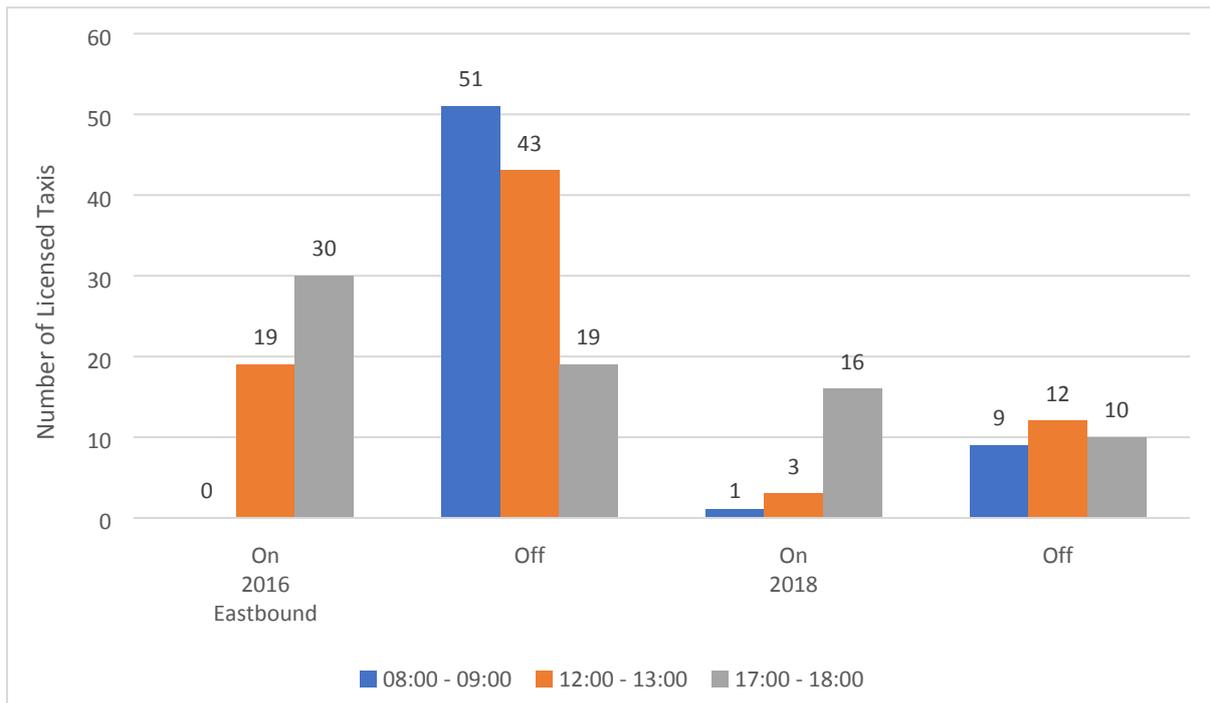
King William Street southbound is not included as this movement is no longer possible

Poultry



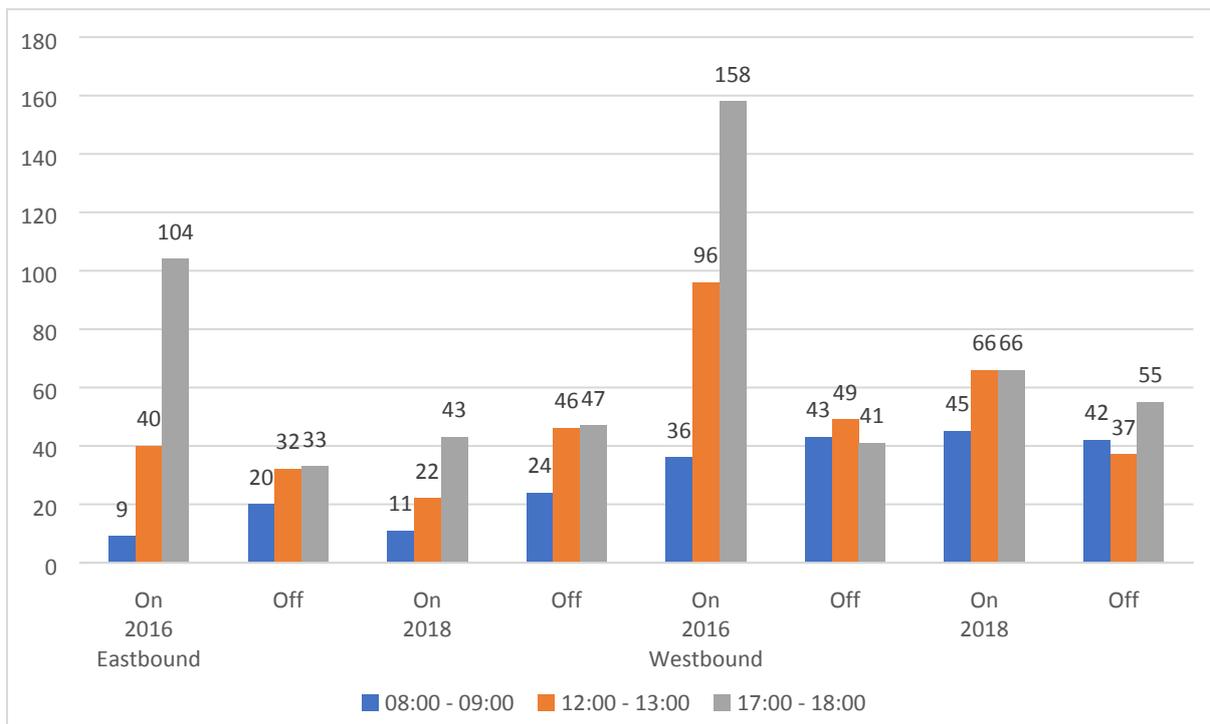
Poultry Westbound is not included as this movement is no longer possible

Threadneedle Street



Threadneedle Street Westbound is not included as this movement is no longer possible

Gresham Street



The counts summarised above demonstrate that based on the spot checks undertaken by officers to date, the volume of Licensed taxis operating has decreased at all sites surveyed. We believe that this decrease is possibly influenced by the following;

- **The length and depth difference between the surveys** – 2016 surveys took place across 17 sites and picked up taxis with and without passengers in addition to those displaying lights or otherwise. 2018 surveys were undertaken over five sites only and counted taxis with lights on or off only.
- **Licensed Taxi usage of Queen Victoria Street** – under the current operation, Bank Junction is formally open to vehicular traffic in an eastbound direction via Queen Victoria Street, observations have shown that Licensed Taxis are using this route in higher volumes than other surveyed streets such as Poultry and Gresham Street.

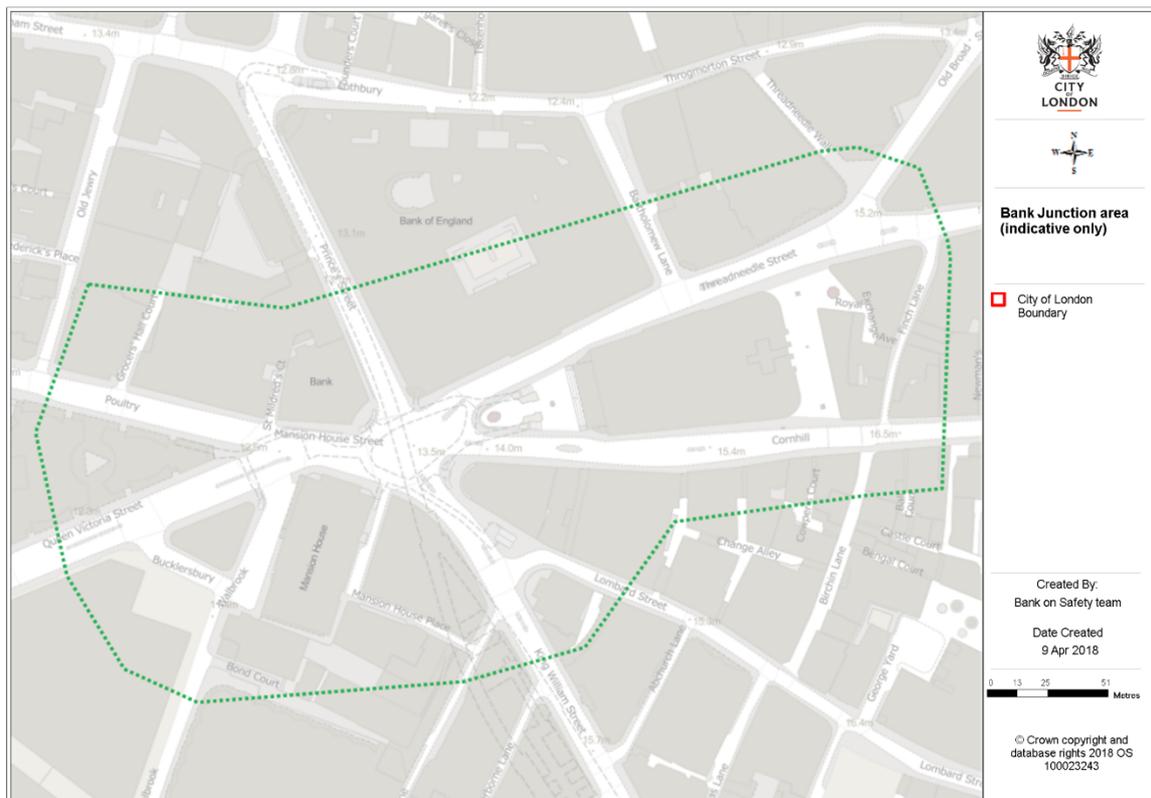
Whilst there are limitations in the current operation of the junction and the surveys have been undertaken on a provisional basis, it is acknowledged that the Bank on Safety Scheme may have resulted in a reduction in taxi availability in the vicinity of Bank Junction. However, it is also observed that there are still licensed taxis operating in this area and no zero values were recorded in the 2018 counts. Therefore the opportunity to hail may have decreased somewhat in the immediate vicinity but there are still opportunities to hail licensed taxis at the surveyed sites.

Appendix 5 – Taxicard

Within the Equality Analysis process for the Bank on Safety scheme and as demonstrated by responses to the public consultation exercise, taxi access to Bank Junction, particularly for those with a disability has been identified as a concern. Taxicard is a scheme for London residents with serious mobility impairments or who are visually impaired, the scheme allows residents to use both Private Hire Vehicles and Black Cabs.

Taxicard data has been obtained by the City of London from London Councils for before and after the introduction of the Bank on Safety scheme and has been anonymised and analysed to understand the change to trips into and out of the area shown in Figure 10;

Figure 10: Definition of the Bank Area for Taxicard data analysis



The area shown in Figure 10 includes the Bank on Safety scheme area in addition to a number of prominent local properties and businesses such as The Ned Hotel, the Bank of England and the Royal Exchange. Due to data protection restrictions, exact number of trips to individual properties cannot be presented, however Figure 10 below shows the number of trips into and out of this area in the 8 months before Bank on Safety was implemented and the 8 months since Bank on Safety was implemented.

Figure 11: Taxicard trips into and out of to the Bank Junction area, 8 months pre-scheme and 8 months post-scheme

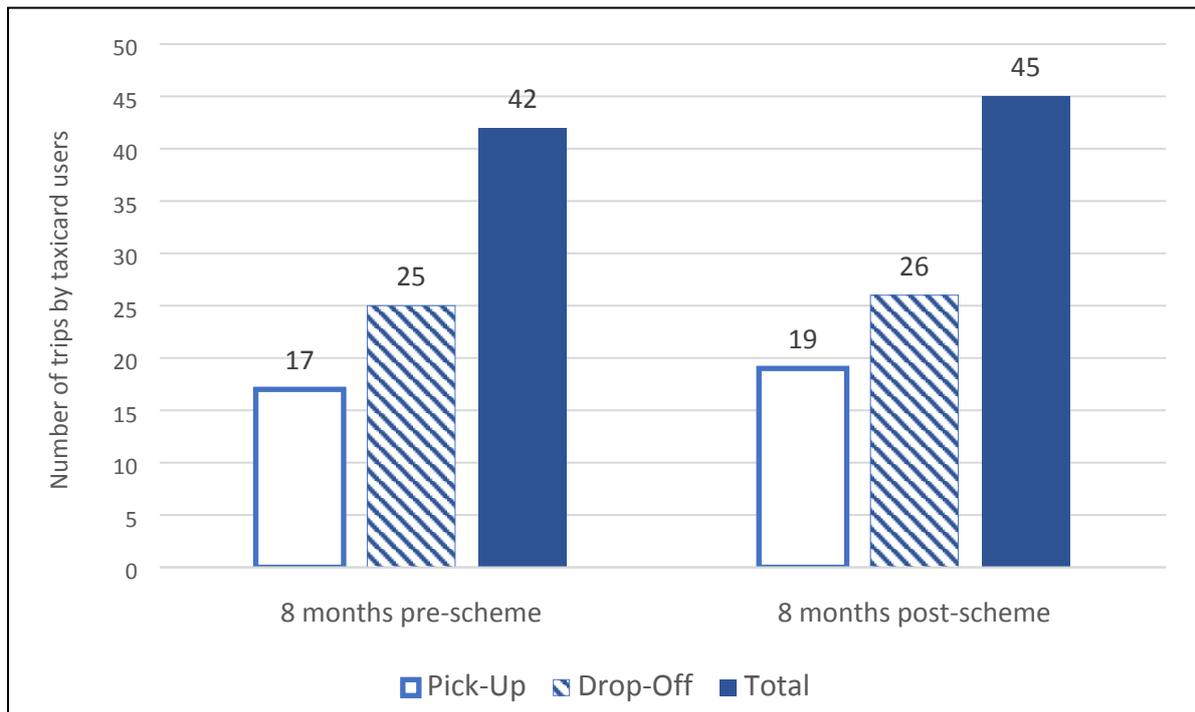


Figure 11 demonstrates that there has not been a meaningful change in the numbers of Taxicard users taking taxis into and out of the area shown in Figure 10 since the implementation of the Bank on Safety Scheme.

It should be noted that the taxicard journeys outlined above are undertaken by a large number of users travelling to and from addresses which differ pre and post scheme, as such it is not possible to robustly compare the change to journey times or costs. Data around taxi journey times and costs can be found in Appendix 5 of the Bank on Safety monitoring report published at this link;

<http://democracy.cityoflondon.gov.uk/mgAi.aspx?ID=71626>.