



# Equality Impact Assessment – A-board Policy update and Way-board eligibility

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<b>Proposal Title</b>	A-Board Policy update – To allow A-boards for wayfinding via a licence.
<b>Details of the lead officer completing the Assessment</b>	Andrea Larice, Strategic Transport
<b>Department Responsible:</b>	Environment, City Operations, Strategic Transport
<b>Who has been involved in creating the EQIA:</b> (please summarise/list stakeholders you have engaged with and how)	City Corporation Highways Team City Corporation Parking Team City Corporation Transport Strategy Team
<b>Date of Initial assessment:</b>	This EQIA examines and reviews the proposed changes to the A-board policy and introduce a Way-Board and gathers a better understanding of the impacts of the changes.  This EQIA is dated July 2025.
<b>Date of next review</b>	Should members proceed with this option an evaluation of this EQIA should be conducted in accordance with the public consultation, implementation of the Policy, and after the successful implementation of the Policy.

# 1.PROPOSAL OVERVIEW

The City of London Corporation's Transport Strategy outlines objectives for street design, connectivity, and accessibility within the Square Mile.

The proposed update includes maintaining the existing ban on advertising A-boards across the City of London, while considering the introduction of a licensing system for Wayfinding A-boards ("Way-boards") in specific circumstances. This approach seeks to address both public highway accessibility and safety, as well as business needs for directional signage. The EQIA examines the possible effects of these changes on individuals with protected characteristics

## Purpose of the Policy Change

The City Corporation plans to revise its A-board policy to:

- Continue the City-wide ban on advertising A-boards.
- Establish a licensing system for Way-boards in select cases where wayfinding is considered essential and accessibility can be preserved.

Legal frameworks to consider:

- Equality Act 2010 – Section 20(4): Duty to make reasonable adjustments to avoid placing disabled people at a substantial disadvantage.
- Highways Act 1980 – Section 130: Duty to assert and protect the rights of the public to use and enjoy the highway.
- Public Sector Equality Duty (PSED): Requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations.

## Potential impacts

The proposed update to the A-board policy may have varying impacts on individuals with protected characteristics.

The placement of A-boards on footways may adversely affect individuals with disabilities by obstructing pathways, creating potential tripping hazards, and complicating navigation—particularly for those who are blind or partially sighted. Such boards may also impede tactile paving and diminish the clarity of pedestrian routes. While increased visibility of local services may offer some benefits to older adults, there remains an elevated risk of trips and falls associated with reduced mobility or declining vision. Regarding pregnancy and maternity, although no direct impacts are identified, narrowed walkways can still present challenges for individuals using prams or mobility aids.

Disabled persons, especially those who are blind or partially sighted, wheelchair users, and individuals with mobility impairments, are most susceptible to the adverse effects of A-boards situated on public highways. Inappropriately placed signage can act as physical barriers, reduce navigable space, and introduce additional tripping hazards. Older adults, children, and those who are pregnant or accompanied by prams may also be disproportionately affected by congested or restricted footways.

Furthermore, the presence of A-boards on pavements can considerably decrease available walking space, occasionally compelling pedestrians to step into the carriageway to bypass obstacles. This situation not only poses safety risks but also compromises independent movement for all pedestrians, including those without disabilities. Inconvenience, increased stress, and greater risk may result from navigating cluttered walkways. Consequently, maintaining clear and accessible pavements is paramount to ensuring safety, dignity, and equal access for all members of the community, irrespective of their protected characteristics.

Although the presence of A-boards may have negative impacts —particularly for individuals with disabilities, older adults, parents with prams, and others with mobility challenges—these impacts can be effectively mitigated by implementing a strict licensing policy combined with robust enforcement measures. By establishing clear and stringent criteria, such as maintaining a minimum 1.8-metre unobstructed footway, requiring high-contrast, cane-detectable signage, and ensuring that A-boards are positioned only where accessibility will not be compromised, the risks can be substantially mitigated.

Regular monitoring and responsive enforcement will ensure compliance, while ongoing public engagement and accessible reporting channels will allow issues to be identified and addressed promptly. Although no direct negative impacts have been identified for other protected groups, including those defined by race, religion, gender, or sexual orientation, continued assessment will help guard against potential indirect discrimination. With such safeguards in place, the adverse effects associated with A-boards can be effectively managed, balancing the needs of businesses with the imperative for accessible, safe, and inclusive public spaces for all.

## **2. EVIDENCE AND IMPACT ANALYSIS**

### **Introduction**

A-boards, or Advertising boards, are typically used by businesses to advertise and promote their services. Constructed as simple stand-alone boards mounted on heavy 'A'-shaped frames, they are placed across pavements to attract attention. Their size and style can vary widely, reflecting the diversity of business activities across the City.

A-boards often narrow the pavement and can create significant obstructions for pedestrians. Many campaigning organisations have called for a complete ban on A-boards, emphasising that clear, unobstructed routes are critical for elderly people, blind and partially sighted individuals, and those using wheelchairs or mobility aids.

Concerns about A-boards have been raised by the Royal National Institute of Blind People (RNIB) representing people who are blind or partially sighted. They note that a proliferation of A-boards can make it difficult to navigate pavements safely, often forcing individuals to manoeuvre around obstacles or risk stepping into the road. Encounters with A-boards can lead to injury or undermine the confidence and mobility of people with vision impairments, restricting their independence and ability to participate fully in community life.

Transport for All (2014) also highlighted that *“Street clutter is not just a problem for visually impaired people, but a problem for wheelchair users, scooter users, buggy*

*users, and older people too. Transport for All welcome this ‘zero-tolerance’ approach to businesses which repeatedly flout rules on keeping the pavement clear. Not everyone can step down into the road to bypass an A-board or other obstacle.”*

While hybrid policy approaches—allowing A-boards on wider streets, for example—have been considered to balance business demands with pedestrian safety, the City’s narrow footways and high pedestrian volumes have made such policies inequitable. Permitting A-boards on some wider streets, like Cheapside, could disadvantage traders on narrower lanes such as Bow Lane, undermining fair competition. This issue was raised in a 2014 Planning & Transportation Committee paper, which also referenced complaints from traders and informed subsequent policy discussions.

Reflecting these concerns, in March 2020, the Planning & Transportation Committee approved a City-wide ban of A-boards. However, enforcement implementation was postponed due to the COVID-19 pandemic and the need to allow footfall in the City to recover in the post-pandemic period. City pavements are seeing rising use, with current foot traffic at 70% of 2019 levels. The Greater London Authority forecasts a 14.2% increase in City of London workers by 2041. The historic layout of many City streets contributes to the challenge, with several areas featuring particularly narrow pavements. Negotiating these footways can be especially difficult for wheelchair or mobility scooter users and parents with buggies. When A-boards are present, the lack of sufficient pavement space may force pedestrians to step into the carriageway to pass by. Maintaining accessible pavements is crucial to ensure safe and independent movement for all.

## **Data considerations and limitations**

### ***Pregnancy and Maternity***

ONS Conception Statistics for England and Wales, 2020, present conception data for the City of London and the London Borough of Hackney together to ensure confidentiality.

In 2020, there were 5,659 conceptions recorded in Hackney and the City of London. This corresponds to a conception rate of 74.6 per 1,000 women aged 15 to 44 years, marginally higher than the Inner London average (66.1) but below the overall London average (76.2).

It is important to note that this data may not fully represent the majority of pregnant women in the City who may be impacted by the proposed change, as many commuters and visitors are regularly present in the area rather than being permanent residents.

### ***Age***

The Office for National Statistics (ONS) 2021 population statistics for the City states a total population of 8,580 for the borough. The age breakdowns for the City and London are detailed in Table 1 below:

Table 1: Age Breakdown for City and London (Source: ONS Census Data 2021)

Age	City of London (%)	Greater London (%)
Total: All residents	100.0	100.0
Aged 4 years and under	2.5	6.0
Aged 5 to 9 years	1.9	6.0
Aged 10 to 15 years	2.4	7.2
Aged 16 to 19 years	2.1	4.4
Aged 20 to 24 years	11.2	6.7
Aged 25 to 34 years	25.8	18.1
Aged 35 to 49 years	21.2	22.7
Aged 50 to 64 years	18.8	16.9
Aged 65 to 74 years	8.3	6.5
Aged 75 to 84 years	4.4	3.8
Aged 85 years and over	1.4	1.6

The figures above illustrate the following:

- The City has significantly fewer people under the age of 15 (6.8%) compared to Greater London (19.2%)
- The City 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 and Greater London region

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

Age Band	City of London Actual and %	Greater London Actual and %
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 compared to Greater London. Key points include:

- The 25-34 age group accounts for 39% of the City workforce, compared to just 31% of the Greater London workforce. The 35-49 age group comprises 39% of the workforce in the City but slightly less of the Greater London workforce at 36%. The percentage of the workforce in the City aged 50 years and above (14%) is lower than the percentage for Greater London (23%), showing that the City has a smaller proportion of older professionals
- Data from Census 2021 shows that the workforce in the City is significantly younger than the rest of the country, with 61% of workers aged between 22 and 39<sup>2</sup> compared to just 40% in England and Wales.

Research by TfL has found that walking is the most frequently used mode of transport by older Londoners aged 65 and over, with 87% walking at least once a week, and 65% travelling by bus at least once a week.

It is also important to acknowledge the intersectionality between age and disability.

### ***Disability***

The City of London is a unique area with a small residential population but a significant daily influx of workers, students and visitors, making it difficult to fully represent the number of disabled individuals who regularly work, study and visit the City.

The 2021 Census (Office of National Statistics, 2023) found that London 15.7%, or 1.2 million people are disabled. It also identified that City of London had one of the lowest proportions of disabled residents (11.8%) compared to other local authorities in London:

- 3.9% had a disability that limited their day-to-day activities a lot
- 7.9% had a disability that limited their day-to-day activities a little

Specific data on the number of disabled individuals working in the City of London is not readily available with exception to some limited information on City workers holding Red Badges.

- As of 1 November 2024, there were 167 Red Badges issued, with 72 held by City residents and 95 by permanent City workers.

- According to the latest data, approximately 678,000 people work in the City of London (City Corporation, 2023). It is estimated that 0.01% of City workers hold a Red Badge.
- There may also be disabled drivers with designated parking spaces at their City workplace who do not hold a Red Badge.

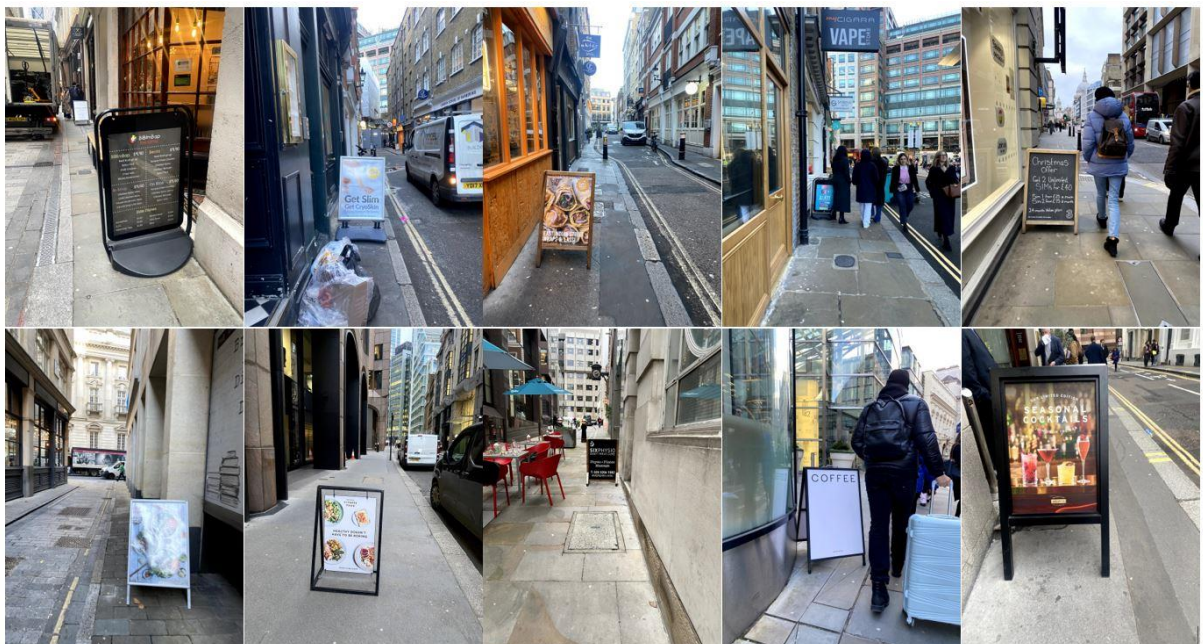
The Department for Work and Pensions (2023) identified that there has been strong growth in the number and rate of disabled people in employment, and a narrowing of the gap between the rate of disabled and non-disabled people in employment (the disability employment gap). However, the disability employment gap is wider for:

- disabled men
- older (aged 50 to 64) disabled people
- disabled people with no qualifications
- disabled people of White ethnicity

## 2024/2025 City Corporation Study on A-Board distribution and use

To assess the distribution and purpose of A-boards across the City, data collection was conducted using a Field Maps App. Using a specifically designed Geographical Information System base layer of business's locations created by the City Corporation GIS team.

For this study, an A-board was identified as a simple stand-alone board with a heavy base or two boards creating an 'A' shape, placed on the pavement to attract attention (**Error! Reference source not found.**). While a stand or similar, was any object that could cause obstruction outside of a premises that was being used to advertise for example: menu stands, flags, delivery carts with branding etc.



*Figure 1: Distinct types of A-boards recorded as part of this project*

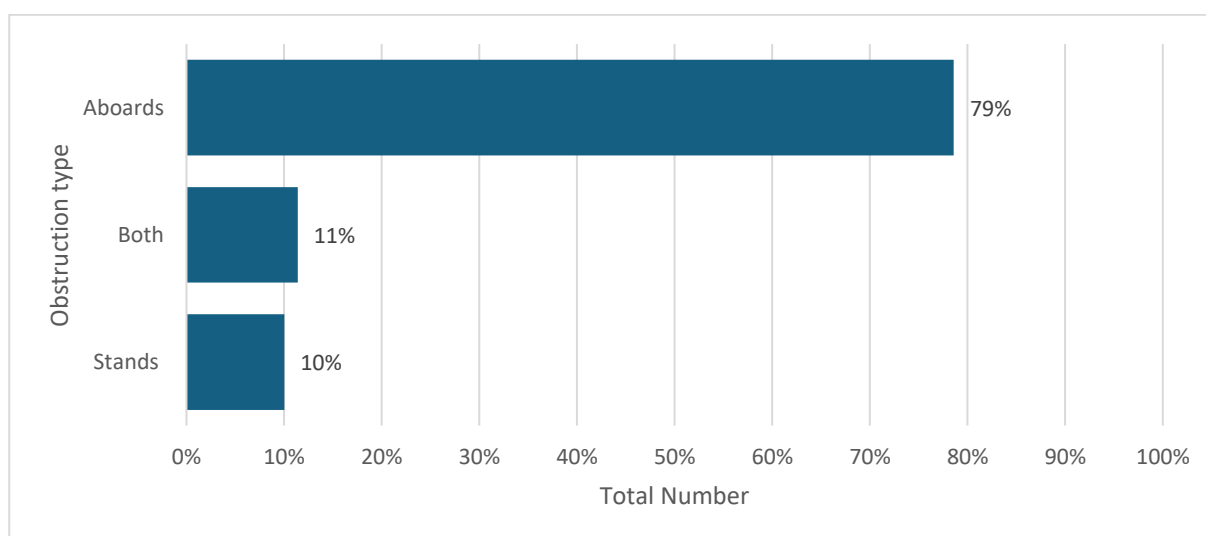


Data Collection was undertaken during working hours (8 – 6pm), from the 5 December to the 20 January 2025. No data was collected from over the Christmas period between 21 December - 7 January 2025. Officers recorded:

- which organisations/locations had an A-board, or stand, or both, to advertise and promote their business.
- the number of each A-board or stand,
- their primary use (wayfinding, advertising, or both) and location (private land, public highway or unsure).

A-boards or stand obstructions were found at 830 of the 1,994 locations (42%).

A-boards dominated the street environment with 805 locations recorded as displaying at least one A-board, 79 displaying at least one stand or similar, and 54 displaying both (**Error! Reference source not found.**).



*Figure 2: Percentage distribution of total numbers of A-board, Stands or both*

Out of 805 locations with A-boards, there were a total of 973 boards, with an average of 1.2 per location. Specifically,

- 666 locations had 1 A-board,
- 116 had 2 A-boards,
- 18 had 3 A-boards,
- 4 had 4 A-boards,
- 1 location displayed 5 A-boards.

Of the 79 locations there were a total of 124 stands or similar.

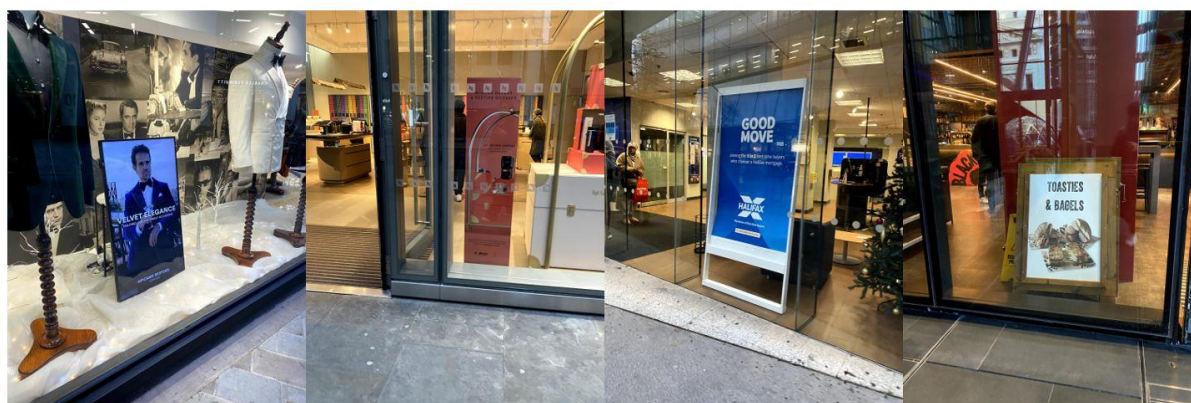
A-boards are primarily used for advertising, with 772 boards (93%) serving this purpose. A small percentage (0.7%) are used for wayfinding; these were usually businesses in alleyways. About 5.7% serve both advertising and wayfinding roles, and 0.6% fall under other uses, such as buckets full of flowers, or postcard stands for sale outside or delivery trollies without branding (Table 3).

*Table 3: Distribution of A-boards by purpose*

Category	Number of Boards	Percentage
Advertising	772	93%
Wayfinding	6	0.7%
Both advertising and wayfinding	47	5.7%
Other	5	0.6%

A-boards placement was photographed, and often A-boards were positioned in ways that cause safety concerns or reduced the available space on footways, which could lead to obstructions and people walking stepping onto the street.

Officers observed that some businesses were displaying A-boards or stands within their premises, rather than placing them outside, thus keeping the pavements accessible. These businesses were not recorded as having A-boards. Instead, officers photographed these as examples of best practices (**Error! Reference source not found.3**).



*Figure 3: Examples of best practice seen at locations across the City*

The data on the type of land usage reveals that a significant majority of A-boards are on the public highway (**Error! Reference source not found.4**).

*Table 4: Distribution of A-boards by land type*

Type of Land	Number	Percentage
Public highway	621	75%
Private land	153	18%
Uncertain	56	7%

In terms of distribution A-boards and stand obstructions were spread out across the City of London, present in every Ward (**Error! Reference source not found.**).

A-Boards were also recorded along streets such as Bishopsgate, Farringdon Street, and New Bridge Street, which fall under the TLRN and are subject to regular enforcement.

These findings highlight both the widespread presence and diverse distribution of A-boards and stand obstructions throughout the City of London, underscoring the importance of consistent monitoring and effective policy enforcement across all wards.

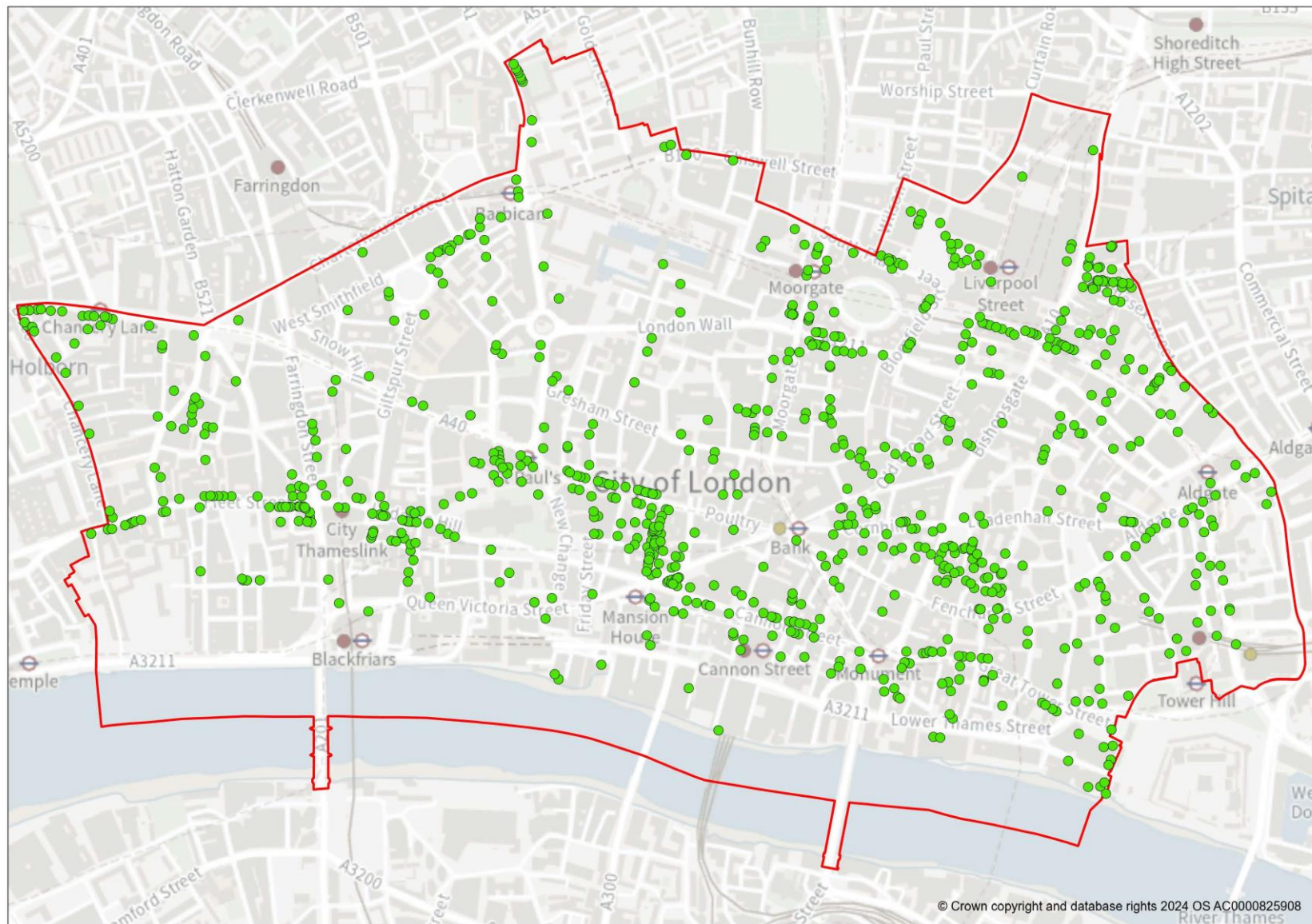


Figure 4: Distribution of A-board and stand locations across the City of London (please note this map was created using all the entered location points, prior to data cleaning so there may be slight discrepancies)

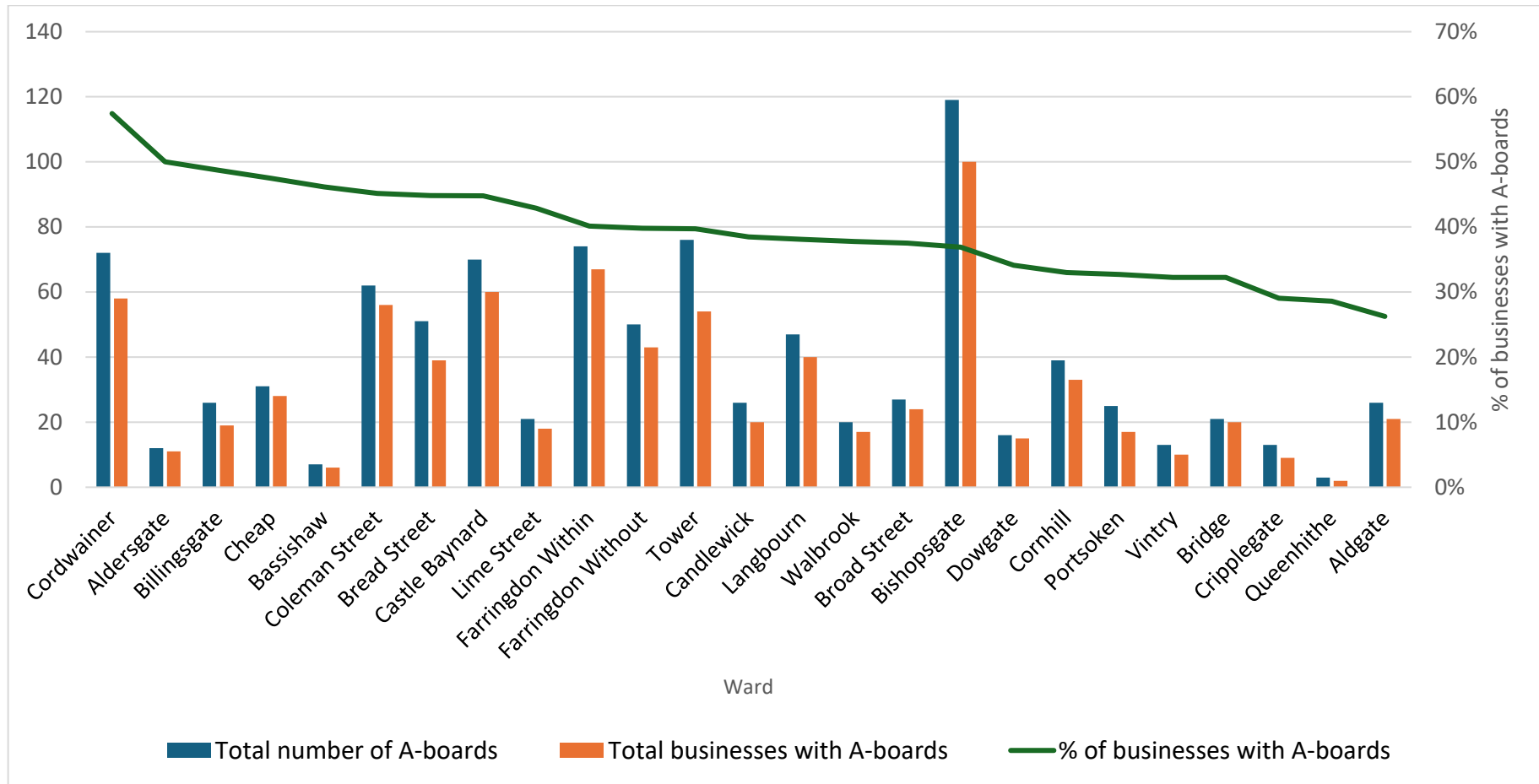


Figure 5: Total number of A-boards by Ward



To evaluate the distribution and use of A-boards throughout the City, data was collected via the Field Maps App. This process utilised a custom Geographical Information System (GIS) base layer of business locations developed by the City Corporation GIS team.

A-boards or similar obstructions were identified at 830 out of 1,994 surveyed sites, representing 42% of the total location

## Proposed changes

### Amend the A-board policy to allow A-boards for wayfinding purposes by exception (via a Way-board licence)

Under this option there would still be a City-wide A-board ban but business would be able to apply for a Way-board licence by exception subject to meeting set eligibility criteria. As less than one percent of signage was identified as exclusively for wayfinding (0.7%) and 5.7% were identified as utilised for both advertising and wayfinding purposes. A licensing system could allow businesses with genuine needs for A-boards to maintain visibility.

To further clarify the distinctions between Way-Boards and Advertising Boards the table below highlights the key differences in purpose and public benefit.

Aspect	Wayfinding Board (Way-board)	Advertising Board (A-board)
<b>Purpose</b>	To help people navigate to a business or service (e.g., directions or map)	To promote a business, product, or service.
<b>Public Benefit</b>	Improves navigation and orientation	Primarily benefits the business
<b>Placement</b>	Strategically placed for navigation purposes	Outside business premises

There will be a strict Eligibility Criteria that outlines the necessary licensing conditions for businesses wishing to apply for a Way-board license. A draft Licencing and Eligibility Criteria and Guidance can be found in Appendix 1.

Licences would incur a fee and would require a formal application procedure. Applicants will need to demonstrate that their Way-board is for wayfinding purposes and meets stringent accessibility criteria, as outlined in forthcoming guidance. Each application will be reviewed, and licences will be granted to successful applicants.

Enforcement will focus on verifying whether a valid licence is present for any Way-board displayed. The proposed licensing scheme is intended strictly for exceptional circumstances only, and all businesses must adhere to the established guidelines.

### Positive

- Small and medium-sized businesses would benefit from increased visibility and the ability to use their A-boards. This supports equity in business competition. For many small and medium enterprises (SMEs), street-level advertising such as A-boards could be a tool for attracting foot traffic and

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communicating daily specials, services, or promotions. In areas with high pedestrian flows, like the City of London, A-boards can help these businesses remain visible amidst larger competitors who might have more extensive branding resources. Allowing continued use of A-boards for wayfinding — subject to regulation—could help level the playing field, ensuring that independent businesses have opportunities comparable to larger chains.

- Enhanced wayfinding signage, such as clearly marked A-boards, can be particularly beneficial for older residents and visitors, as these signs make it easier to locate amenities and services in busy urban environments (Age UK, 2018).

### **Negative**

- Older people, particularly among people over 65, are more vulnerable to slips, trips, and falls (Public Health England, 2019). As such, A-boards can be a risk and need regulations and careful placement—possibly including guidelines from the Royal National Institute of Blind People (RNIB, 2021) are crucial to balance the needs of accessibility and businesses visibility, ensuring public spaces remain safe for all users.
- Beyond the risks of slips, trips, and falls, A-boards can contribute to additional public realm challenges. Street clutter can obstruct the free flow of pedestrians, particularly impacting those using wheelchairs, mobility scooters, or pushing prams.
- Narrow pavements can become congested, making it difficult for people with visual impairments or limited mobility to navigate safely. There is also a risk that, without consistent enforcement, some businesses may place boards in unsuitable locations or allow them to encroach upon pedestrian routes, exacerbating accessibility concerns and causing people to step into the street. Putting them at risk of collisions.
- Maintenance of A-boards can be inconsistent and poorly maintained or weather-damaged boards could become hazards, increase the likelihood of accidents or creating unsightly streetscapes. This is of particular concern for way-boards, which will by their nature likely be out of the line of sight of the businesses responsible for them. If they fall, become damaged or otherwise create a hazard, this may not be immediately visible to the business responsible.

### **Outcome**

A comprehensive assessment of the advantages and disadvantages indicates that implementing a regulated licensing system for Way-boards represents a pragmatic solution. Establishing explicit criteria and ensuring robust enforcement can facilitate greater visibility and fair competition for small and medium-sized businesses, without unduly impacting individuals who walk, wheel or use mobility aids.

Transport for All (2015) notes: *“Street clutter is not just a problem for visually impaired people, but a problem for wheelchair users, scooter users, buggy users, and older people too. Transport for All welcomes this ‘zero-tolerance’ approach to*

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*businesses which repeatedly flout rules on keeping the pavement clear. Not everyone can step down into the road to bypass an A-board or other obstacle.”*

Upholding stringent eligibility requirements and guidance—through careful placement and high maintenance standards—serves to reduce associated safety risks. In conclusion, the adoption of a licensing scheme with transparent fees and criteria provides a structured framework that supports business growth and urban vitality while prioritising accessibility and safety for all members of the community.

### **Proposed licencing structure and fee for “Wayboards”**

Applications are reviewed based on established Way-board eligibility criteria. If an application does not meet these criteria, it will not be approved; applicants have the option to appeal the decision.

The proposed fee structure, following Barnet Council’s model (from January 2025), is £245: a non-refundable £72 upfront, then £173 upon approval before the licence is issued. The licence is valid for one year.

#### **Proposed Way-board Licence**

- Total Cost: £240
- Application Fee: £70 (non-refundable, paid upfront)
- Licence Fee: £170 (paid after approval, before licence is issued)
- Licence validity: 2 years
- Licence Fees subject to review every four years

#### **Positive**

- In setting low costs, the structure is designed to cover administrative expenses while remaining accessible for businesses, particularly SMEs. By keeping costs manageable and clear, the scheme promotes equal opportunity, making participation in the Wayboard licensing system fair and inclusive for all applicants regardless of background.
- Accessibility considerations—such as providing information in alternative formats or offering additional support during the application process—further strengthen compliance with the Equality Act and help create an environment where all eligible businesses can participate on equal footing.

#### **Negatives**

- A potential downside is that low fees may unintentionally lead to an increase in street clutter or obstructions if not managed carefully.

#### **Outcome**

On balance, the current proposed fee structure creates a positive framework that encourages participation while responsibly managing administrative costs. However, careful oversight is necessary to prevent unintended negative consequences. By maintaining transparency in costs, ensuring ongoing accessibility support, and periodically reviewing the fee levels, the scheme can continue to promote fairness and inclusivity. With these safeguards in place, the licensing system will be well-

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positioned to meet the needs of diverse business applicants and uphold equal opportunity.

### **Licence validity and renewals**

Generally, licences are valid for 1 year (pavement licences). We are proposing renewal period to two years (applicants will need to provide evidence to support their renewals). The change aims to empower small businesses by providing them with a longer period of validity for their Wayboard Licence, thereby reducing the stress and effort associated with frequent renewals.

#### **Positives:**

- Longer validity periods renewals period can reduce administrative and financial barriers for SME's

#### **Negative**

- There is a risk that some individuals might exploit these policies, this could exacerbate the negative impacts of A-boards.

#### **Outcome**

On balance a two-year validity is expected to have a positive effect for small and medium enterprises by reducing administrative and financial hurdles, thus supporting local businesses. However, to address concerns regarding potential misuse—such as increased street clutter or obstruction—a robust eligibility criteria is required.

The adoption of strict eligibility criteria, evidence requirements, and targeted guidance will help mitigate negative impacts, particularly for disabled people, older adults, and families with prams. Through these measures, the policy aims to strike an equitable balance between supporting economic activity and safeguarding accessibility and inclusivity in public spaces.

## **3. STAKEHOLDER ENGAGEMENT**

Consultation or stakeholder engagement has not been undertaken to date.

Stakeholder engagement would take place with local stakeholders if members choose to adopt option 2 in the report to S&W 19<sup>th</sup> sept. and the EQIA will be updated at this point.

## **4. DECISION MAKING (MITIGATIONS AND CHANGE)**

It is recommended that the following actions are taken to avoid or mitigate any negative impact and to better advance equality and foster good relations.

### Strict eligibility criteria and guidance

The introduction of strict eligibility criteria for Way-board licensing is a key mechanism for mitigating potential negative impacts on accessibility and safety. By limiting eligibility to businesses located in alleyways, courtyards, or other locations without direct street frontage or alternative signage options, the policy ensures that only those with a demonstrable need can apply.



## **Please refer to the EQIA guidance when completing this form**

This targeted approach prevents widespread proliferation of Way-boards, thereby reducing the risk of street clutter and obstructions that could disadvantage disabled people, older adults, and parents with prams.

The requirement for applicants to provide evidence—such as photographs showing limited visibility—further supports objective decision-making and reinforces the City Corporation's commitment to maintaining inclusive and navigable public spaces.

### **Engagement**

Engaging with stakeholders is crucial as it ensures that the voices and experiences of those directly affected are heard and considered in the policy development process. It is important to involve people with a range of protected characteristics and lived experience in this proposed change to introduce Way-boards.

To further support inclusivity and responsiveness, establishing a dedicated feedback line for reporting obstructions or concerns relating to accessibility is essential. This direct channel would allow users, particularly those with lived experience of disability, to promptly highlight any barriers encountered in public spaces or with the new Way-board system. Enforcement officers will monitor compliance and respond to public reports.

Such a mechanism not only ensures ongoing dialogue but also enables timely action to address issues as they arise, thereby reinforcing the City Corporation's commitment to accessible environment for all.

### **EQIAs will be required from applicants as part of the licensing process**

As part of the Way-board licensing application process, all applicants will be required to complete an Equality Impact Assessment (EQIA). This ensures that businesses proactively assess how their proposed Way-board placement may affect people with protected characteristics, including disabled individuals, older adults, and parents with prams.

Applicants must identify potential risks, for example, obstructions to walking and wheeling paths or proximity to tactile paving and propose mitigation measures, such as maintaining a minimum 1.8m clear footway and using high-contrast, cane-detectable way board signage.

These EQIAs will be reviewed by City Corporation officers to verify accuracy and feasibility, helping to ensure that licensed Way-boards do not compromise accessibility or safety. This process will support our Public Sector Equality Duty, while reinforcing the City Corporation's commitment to inclusive public spaces.

## **5. MONITORING AND REVIEW**

Monitoring will help ensure the impacts identified have been successfully mitigated and will aim to maximise the potential positive impacts identified for businesses, especially SMEs.

It is recommended that lines of communication are maintained on the website so that different user groups can provide feedback where appropriate.

## 6. RECORDING YOUR DECISION AND SIGN-OFF

The proposed changes to implement a Way-board licencing system are anticipated to positively impact businesses in alleyways and passages, who don't have visibility and business from passers-by. These are usually small or medium sized businesses in the City.

The introduction of a licensing system for wayfinding A-boards ("Way-boards") would allow businesses with demonstrated need to apply for a license, thereby supporting their visibility, provided they do not reduce accessibility or compromise the safety of public highways, walkways, or public spaces in the City.

Several potential negative impacts have been identified in relation to A-boards causing obstruction and their potential impact on disabled people, elderly people and people who are currently pregnant or have small children. Although these can be mitigated via the licensing system. However, fallen or poorly placed A-boards may impede access and obstruct street-level sightlines, affecting not only people using wheelchairs or children who navigate the environment from a lower eye level, but everyone who uses public spaces. Such obstructions can hinder the ability of all members of the public to anticipate hazards, locate crossings, or respond quickly in emergency situations. The Department for Transport's Inclusive Mobility guidance reinforces this by stating that clear, unobstructed sightlines are essential for safe navigation for all (Department for Transport, 2021). Therefore, it is important to consider the risks that displaced, or poorly positioned A-boards pose not only to accessibility for groups but to the overall safety and security of public spaces for everyone. As way-boards are likely to be out of the line of sight of the businesses responsible for them, it may be difficult for a business with a way-board license to monitor whether the way-board is causing an obstruction or creating a hazard.

There are also several risks to consider

Risk	Impact	Mitigation
<b>Reputational</b>	It could be seen as a departure from the previously established policy of a complete A-board ban—a policy which has been strongly supported by accessibility and disability advocacy groups and was implemented to champion the principles of the Equality Act.	Clear communication that Way-boards are for exceptional cases only
<b>Legal</b>	Appeals or challenges if licensing guidance is not very specific or policies are perceived as inconsistent.	Transparent criteria and independent appeals process

**Please refer to the EQIA guidance when completing this form**

Officers recommend that this EQIA be updated again following consultation and monitoring.

**Please refer to the EQIA guidance when completing this form**

**Sign off**

1. Officer completing the EQIA

<b>Name</b>	Andrea Larice
<b>Job Title</b>	Behaviour Change and Campaigns Officer
<b>Date</b>	28.07.2025
<b>Signature</b>	<i>Andrea Larice</i>

2. Assistant Director

<b>Name</b>	Bruce McVean
<b>Job Title</b>	Assistant Director – Policy and Projects, City Operations
<b>Date</b>	
<b>Signature</b>	

3. Senior Manager or Chief Officer

<b>Name</b>	Ian Hughes
<b>Job Title</b>	Director of City Operations
<b>Date</b>	
<b>Signature</b>	

Once this form has been signed off, please send a copy of the form to the EDI Team: [CSPT.EDI@cityoflondon.gov.uk](mailto:CSPT.EDI@cityoflondon.gov.uk)

**Appendices**

<b>Appendix 1</b>	<a href="#">2025_06_Proposed Way-Board Licensing Policy.docx</a>
<b>Appendix 2</b>	
<b>Appendix 3</b>	

## References

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**Please refer to the EQIA guidance when completing this form**

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