

Appendix

Equality Impact Assessment Form

Before completing this form, please refer to [the supporting guidance document](#)

The purpose of this form is to aid the Council in meeting the requirements of the Public Sector Equality Duty contained in the Equality Act 2010. This requires the Council to have “due regard” of the impact of its actions on the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic and those who do not.

The assessment is used to identify and record any concerns and potential risks. The following actions can then be taken to address these issues.

- Remove risks: abandon the proposed policy or practice
- Mitigate risks – amend the proposed policy or practice so that risks are reduced
- Justify policy or practice in terms of other objectives

1- Policy details	
Name of policy	Street Lighting – Proposed Service Changes
Department and service	Environment & Transport Department Structures & Street Lighting
Who has been involved in completing the Equality Impact Assessment?	Pat Clarke DEG members
Contact details	pat.clarke@leics.gov.uk
Date of completion	15/05/23 Updated 26/5/23
2- Objectives and background of policy or practice change Use this section to describe the policy or practice change What is the purpose, expected outcomes and rationale? Include the background information and context	

<p>What is the proposal?</p> <p>What change and impact is intended by the proposal?</p>	<p>We propose to reduce lighting intensity to 30% from 8pm (currently 10pm). Lighting will remain on but will be slightly dimmer than current levels for the hours between 8-10pm, from which time most residential lights are already dimmed to 30% anyway.</p> <p>The Council's Medium Term Financial Strategy requires savings of £150,000 in 2023/24, rising to £500,000 in subsequent years, to be made in the street lighting service. This can only be achieved by reducing either the time that lights are on or their brightness.</p> <p>The changes are proposed to be Countywide and will impact all areas covered by the Council-owned and managed street lighting.</p> <p>In doing that, however, it is known there are locations that will be of concern (e.g., major junctions etc) and there may need to be exceptions to this change, so an engagement with communities on their views on those potential exceptions will be sought.</p>
<p>What is the rationale for this proposal?</p>	<p>The Council needs to make significant financial savings over the next four years. This means that difficult decisions are having to be made on what the Council continues to deliver and which services must be reduced.</p> <p>It is estimated that the proposal would save £534,000 per annum based on current energy prices.</p> <p>The proposal also supports Council's commitment to becoming net zero emissions by 2030. It is estimated that the proposal would save 1.5 million kWh energy and 315 tonnes of carbon dioxide (CO₂e).</p> <p>The Council has the power to light the highway but not a duty to do so.</p> <p>British Standard (BS) 5489 states that 'Road lighting should provide visual clues and reveal obstacles so that safe vehicular progress is possible. It should reveal all the features of the road and traffic that are important to all road users, including pedestrians.'</p> <p>The proposal moves away from compliance with current British Standards, so is deemed a 'Departure from Standards' and will, therefore, require Member approval. However, there is no way of achieving the required savings whilst retaining compliance with the lighting standards.</p>

3- Evidence gathered on equality implications - Data and engagement

What evidence about potential equality impacts is already available?

This could come from research, service analysis, questionnaires, and engagement with protected characteristics groups

What equalities information or data has been gathered so far?

The Street Lighting Energy Reduction Project (2009) included an equalities assessment.

There have been further initiatives that build on this in the years since. The most recent was in 2022 and its purpose was to achieve energy and cost savings by reducing the operational hours of circa 29,000 residential Part-Night Lighting (PNL) assets by adjusting the ambient light settings that trigger the switch-on and switch-off times at twilight (sunset and sunrise) from 15 LUX to 5 LUX (5 LUX is slightly darker than 15 LUX). An EHRIA was developed for this project.

It is assumed that the current project's impacts will be largely similar, so this EIA is largely based on that EHRIA. Engagement will be held on the proposals and it is anticipated that this will give us more specific feedback on sites where people with protected characteristics may be impacted before a final decision is made.

What does it show?

The 2009 EHRIA referred to outcomes from PNL pilots in Essex and Gloucestershire. The most relevant excerpt states:

“Essex County Council has recently finished a Part-Night Lighting pilot involving about 6,000 lights, which have been switched off from midnight to 5.30 am since April 2007. During this period, crime in the area has actually dropped slightly and traffic accidents have not increased. Fear of crime was measured by asking citizens if they felt safe after dark. The percentage of people who felt safe after dark in the pilot areas dropped after the Part-Night Lighting was introduced (it dropped overall in Essex as well). However, it did recover a year after the pilot had been in place to a higher level than its starting point before the pilot started.”

Council's Accident Investigation Team and Leicestershire Police were consulted one year after PNL implementation in each village/town, with no evidence of an increase in accidents or crime. A further Council crime study was completed in 2015 showing no increase in crime in PNL areas.

What engagement has been undertaken so far?	The savings requirement was set out in the MTFs which was subject to formal consultation prior to approval in February 2023. It has not been possible to carry out any external pre-engagement due to the timescale in which engagement has to take place. Use has been made of internal processes and the DEG to inform the options appraisal.
What does it show?	N/A

4- Benefits, concerns and mitigating action

Please specify if any individuals or community groups who identify with any of the '[protected characteristics](#)' may *potentially* be affected by the policy and describe any benefits and concerns including any barriers.
Use this section to demonstrate how risks would be mitigated for each affected group

Group	What are the benefits of the proposal for those from the following groups?	Are there any known concerns for these groups?	What are the known concerns and how will they be mitigated?
Age	No direct benefits. Indirect benefits of carbon reduction. Indirect benefits of Council financial sustainability across its wider services.	Yes	People may not be directly impacted simply because of their age, but the elderly are likely to be disproportionately impacted if they have mobility, frailty, vision or confidence issues. There is a potential higher risk of slips, trips and falls due to the lower lighting levels as well as a possible increase in road traffic collisions. They may also have a perception of being more at risk of crime or anti-social behaviour. This could impact on their choices about evening activities, which may mean an increase in social isolation for some. More understanding of this will be sought during engagement through disability groups and the Leicestershire Equality Challenge Group.

			Retaining a reduced level of lighting will mitigate some of this, but particularly for those who are visually impaired, this could be insufficient. Other mitigations could include use of reflective strips on potential hazards.
Disability	No direct benefits. Indirect benefits of carbon reduction. Indirect benefits of Council financial sustainability across its wider services.	Yes	<p>People are likely to be adversely impacted depending on the nature of their disability. Some disabilities, such as visual impairment or mobility could mean the proposals make things more difficult and potentially increase risk of slips, trips and falls.</p> <p>Retaining a reduced level of lighting will mitigate some of this, but particularly for those who are visually impaired, this could be insufficient. Other mitigations could include use of reflective strips on potential hazards.</p> <p>People in this group may also have a perception of being more at risk of crime or anti-social behaviour. This could impact on their choices about evening activities, which may mean an increase in social isolation for some.</p> <p>The engagement will seek to understand these potential impacts and police and emergency services representatives will be involved.</p>
Race	No direct benefits. Indirect benefits of carbon reduction. Indirect benefits of Council financial sustainability across its wider services.	Yes	<p>People in this group may have a perception of being more at risk of racially motivated crime or anti-social behaviour. This could impact on their choices about evening activities, which may mean an increase in social isolation for some. However, the proposal to retain lighting, albeit at a reduced level, should reduce the adverse impacts to some extent.</p> <p>The engagement should explore whether residents from ethnically diverse backgrounds may have more fear about racially motivated crime/anti-social behaviour.</p>
Sex	No direct benefits.	Yes	Recent higher rates of violence against women in public places could be of concern. Women may have a real or perceived risk of being affected by this. This

	<p>Indirect benefits of carbon reduction.</p> <p>Indirect benefits of Council financial sustainability across its wider services.</p>		<p>could impact on their choices about evening activities, which may mean an increase in social isolation for some.</p> <p>However, the proposal to retain lighting, albeit at a reduced level, should help reduce the adverse impacts to some extent.</p> <p>Police and emergency services input will be sought through the engagement to identify the scale of the issue and what can be done to mitigate.</p>
Gender Reassignment	<p>No direct benefits.</p> <p>Indirect benefits of carbon reduction.</p> <p>Indirect benefits of Council financial sustainability across its wider services.</p>	Yes	<p>Some people at any stage of gender reassignment may have a perception of being more at risk of crime or anti-social behaviour. This could impact on their choices about evening activities, which may mean an increase in social isolation for some.</p> <p>However, the proposal to retain lighting, albeit at a reduced level, should help reduce the adverse impacts to some extent.</p> <p>Police and emergency services input will be sought through the engagement to identify the scale of the issue and what can be done to mitigate.</p>
Marriage and Civil Partnership	<p>No direct benefits. Indirect benefits of carbon reduction. Indirect benefits of Council financial sustainability across its wider services.</p>	No	.
Sexual Orientation	<p>No direct benefits.</p> <p>Indirect benefits of carbon reduction.</p>	Yes	<p>LGBT+ residents may feel fearful and vulnerable to hate incident/crime because of this proposal. This could impact on their choices about evening activities, which may mean an increase in social isolation for some.</p>

	Indirect benefits of Council financial sustainability across its wider services.		<p>However, the proposal to retain lighting, albeit at a reduced level, should help reduce the adverse impacts to some extent.</p> <p>Police and emergency services input will be sought through the engagement to identify the scale of the issue and what can be done to mitigate.</p>
Pregnancy and Maternity	<p>No direct benefits.</p> <p>Indirect benefits of carbon reduction.</p> <p>Indirect benefits of Council financial sustainability across its wider services.</p>	Yes	<p>A potential greater risk of slips, trips and falls may disproportionately impact some who are pregnant.</p> <p>Retaining a reduced level of lighting will mitigate some of this. Other mitigations could include use of reflective strips on potential hazards.</p> <p>Some people in this group may also have a perception of being more at risk of crime or anti-social behaviour. This could impact on their choices about evening activities, which may mean an increase in social isolation for some.</p> <p>There may also be concerns about travel to access maternity care during the hours impacted in the proposal.</p>
Religion or Belief	<p>No direct benefits.</p> <p>Indirect benefits of carbon reduction.</p> <p>Indirect benefits of Council financial sustainability across its wider services.</p>	Yes	<p>The proposal could impact members of faith communities attending or returning from places of worship during the times affected by the proposals.</p> <p>There may be a perception of increased risk of violence or anti-social behaviour against this group.</p> <p>However, the proposal to retain lighting, albeit at a reduced level, should help reduce the adverse impacts to some extent.</p> <p>Police and emergency services input will be sought through the engagement to identify the scale of the issue and what can be done to mitigate.</p>

<p>Other groups: e.g., rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, deprived, armed forced, or disadvantaged communities</p>	<p>No direct benefits. Indirect benefits of carbon reduction. Indirect benefits of Council financial sustainability across its wider services.</p>	<p>Yes</p>	<p>Some people in any of these other groups may have a perception of being more at risk of crime or anti-social behaviour. This could impact on their choices about evening activities, which may mean an increase in social isolation for some.</p> <p>However, the proposal to retain lighting, albeit at a reduced level, should help reduce the adverse impacts to some extent.</p> <p>In addition to possible fear of increase in crime and anti-social behaviour, carers may also have concerns with the lower-level lighting when travelling during late or early hours to carry out their duties.</p>
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5- Action Plan and Recommendations

Use this section to describe concerns further

Produce a framework to outline how identified risks/concerns will be mitigated.

<p>What concerns were identified?</p>	<p>What action is planned?</p>	<p>Who is responsible for the action?</p>	<p>Timescale</p>
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<ul style="list-style-type: none"> • Disproportionate adverse impact on people with certain disabilities and/or vulnerabilities through greater risk of personal injury (slips/trips/fall). • Potential perception of being more at risk of crime or antisocial behaviour for several protected and other groups. 	<ul style="list-style-type: none"> • Communicating modest changes in lighting levels from 8-10pm across the county. • Engagement to identify sites for which the proposals may not be suitable • Review of risks and development of a suitable and proportionate risk assessment of the proposal. 	<p>Owner - Pat Clarke Departmental lead – Structures and Assets Team Manager</p>	<p>Engagement/consultation is due to take place for four weeks from the end of June 2023 and a risk assessment through to October 2023. The risk assessment will be carried out in close engagement with the police and other emergency services.</p>
<p>6- Way forward</p>			
<p>How will the action plan and recommendations of this assessment be built into decision making and implementation of this proposal?</p>	<p>The findings of the engagement/consultation will feed in to the risk assessment which will inform the final report seeking a Cabinet decision in December 2023.</p>		
<p>How would you monitor the impact of your proposal and keep the EIA refreshed?</p>	<ul style="list-style-type: none"> • Risk assessment process • Engagement with Leicestershire Equalities Challenge Group (LECG) 		
<p>Sign off by DEG Chair/Director or Head of Services</p>			

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