

v1.2

Equality Impact Assessment / Equality Analysis

(updated Dec 2022)

Title of service or policy	EV Charging – Cable Channel Trial
Name of directorate and service	Sustainable Communities
Name and role of officers completing the EIA	Dr. Alex Rowbotham
Date of assessment	Started 3/2/23 Last update 1/3/23

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website.

1. Identify the aims of the policy or service and how it is implemented		
	Key questions	Answers / Notes
1.1	<p>Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<ul style="list-style-type: none"> ● To conduct a trial of new cable channel products which allow safe on-street home charging of electric vehicles (EV’s), through securely capturing the charging cable below the footway pavement surface. Cable channels are fitted within the footway, flush with the surface. Their use mitigates the increasing public practice of trailing cables across the footway surface, which is dangerous and prohibited by the council. ● Responsibility for management of the trial with B&NES and the active travel team. Responsibility for the installation will be with Volker Highways and the judging works as satisfactory for the public highway by Highways Maintenance team. ● Intended outcomes: <ul style="list-style-type: none"> ○ Identify preferred cable channel for B&NES adoption. ○ Understand operational issues of cable channels regards user behaviour, maintenance and supplier business practices. ○ Identify suitable operational practices for the wider deployment of the cable channel offer to B&NES residents. ○ Provide knowledge to inform a cabinet decision on if to proceed from trial to public offer.

<p>1.2</p>	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	<ul style="list-style-type: none"> ● A means by which residents of B&NES are able to legally access on-street home charging of an EV is not currently available. ● Allowing residents (owner occupiers or landlords) to apply for a cable channel to be fitted at their residence, providing them access to on-street home charging, would be a new offer from B&NES. ● The UK governments published plans for decarbonising the transport sector (HMG, 2023) rely upon rapid, large-scale adoption of EV's. Legislation schedules all new cars to be plug-in by 2030. The UK EV charging infrastructure strategy (HMG, 2022) states a vision for 2030 of "effortless on and off-street charging for private and commercial drivers is the norm". ● A lack of on-street home charging options is leading to wider public adoption of trailing cables across the footway surface, which is dangerous and prohibited by both B&NES council, inline with national government guidance. Cable Channels would mitigate trailing cables on footways. ● The trial will provide the necessary information for a review of the decision to allow cable channel instal for B&NES residents, in the fashion of present drop kerb applications. The national approach to cable channel adoption is unclear, with many new products becoming available, but no clear approach being promoted by national government.
<p>1.3</p>	<p>Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<ul style="list-style-type: none"> ● The aims of the trial link with several council policies, including: ● Climate and Ecological Emergency: reducing the areas carbon emissions to zero and achieving nature positivity by 2030. The introduction of cable channels would support the decarbonisation of the transport sector, with EV's having reduced life cycle emissions in comparison to internal combustion engine vehicles. EV's also produce zero tail pipe emissions, reducing their impact on local air quality, to the benefit of the local population and nature.

- Addressing equality issues of footway accessibility for all, through the mitigation of an increasing risk to footway users, especially the less able bodied, presented by the growing practice of trailing charging cables across the footway.

2. Consideration of available data, research and information

Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:

- **Demographic** data and other statistics, including census findings
- Recent **research** findings (local and national)
- Results from **consultation or engagement** you have undertaken
- Service user **monitoring data** (including ethnicity, sex, disability, religion/belief, sexual orientation and age)
- Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations
- Analysis of records of enquiries about your service, or **complaints** or **compliments** about them
- Recommendations of **external inspections** or audit reports

Key questions

Data, research and information that you can refer to

2.1	What equalities training have staff received to enable them to understand the needs of our diverse community?	Meeting with Equalities officer to talk through legal equalities requirements, necessities of EQIA, the particular equalities issues of the cable channel trial and supply contact routes for special interest groups as representatives of protected service user types.
2.2	What is the equalities profile of service users?	<p>Service users can be split into two categories: vehicle users and pedestrians. These categories identify through their requirements on use of the footway where EV charging is taking place and are not mutually exclusive.</p> <p>Vehicle Users (persons wanting to charge their EV on-street from their residences house energy supply): Equalities profile is very wide; Anyone who can drive; Age 17-80+; Single to married with children; Employed to</p>

		<p>retired; All ethnicities, religions and sexual identifications; Hearing impaired; May have mobility issues and use adapted vehicle or Wheelchair Accessible Vehicle. Most EV drivers are of high-medium socio-economic standing, due to the higher cost of EV's and limited availability of second-hand vehicles. Lower socio-economic standing drivers will mostly access EV driving through bringing home commercial vehicles associated with a job or having a Motability supplied vehicle.</p> <p>Pedestrians (persons who wish to use the footway for safe access): Equalities profile is very wide; All pedestrian footway users; Anyone using the footway; Young children to the elderly; Singles, parents & carers with prams, families, groups of school children; Joggers; All ethnicities, religions sexual identifications, sexual orientation, gender identity; Disabled people; All socio-economic status, however persons of lower socio-economic status are more likely to walk or use public transport for travel, as these methods more affordable.</p>
<p>2.4</p>	<p>Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?</p>	<p>Approx. 85% of all EV charging is currently carried out using a home charger. Such a high percentage is a clear indication of the preference of EV for home charging over public charging. Home charging offers more convenience and reduced cost. However, those homes with only on-street parking currently have no legal method of home charging, raising an equality issue of postcode and housing type.</p> <p>The latest survey data from the Oxford trial of the Gul-e has been supplied to B&NES. All participants registered being satisfied or better with the cable channel. The granular details from the survey, including time of use and any parking blocking issues, will be used to develop the trial methodology further.</p> <p>This is a trial which will inform the decision of B&NES in regards of what offer is suitable to residents. Surveys will be used in the trial to gather evidence, in order to understand participant satisfaction, and identify gaps and range of outcomes.</p>

<p>2.5</p>	<p>What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>	<p>Contact from B&NES residents via customer connect or direct email, with subjects broadly grouping as: demanding EV charging provision for residents with on-street parking only; complaining of trailing cables on footways causing trip hazards.</p> <p>Discussions and input from the Royal National Institute of Blind People, through Steve Hyde, SW regional campaigns officer: email exchanges; Supplied RNIB position paper on electric vehicles; Teams meeting Thu 16/2/23 discussed lived experience of partially sighted.</p> <p>Meeting with B&NES Independent Equality Advisory Group (IEAG), planned for 9/3/23, to capture views of varied audience representing range of protected characteristics; Planned for prior to trial start.</p> <p>Contacted Motability; introduced through Energy Saving Trust webinar on Accessible EV Charging (8/2/23); requested Motability involvement both to provide representative voice for customers and potentially introduction to Motability customers in B&NES who operate an EV with no off-street parking.</p>
<p>2.6</p>	<p>If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?</p>	<p>During the trial we aim to seek feedback from people with protected characteristics.</p> <p>When considering volunteer applications, we will endeavour to prioritise people with protected characteristic for participation, as much as the information we can reasonably gather allows.</p> <p>We are in contact with Motability, the organisation that provides the Motability scheme for HMG, and hope to work with their customers as participants in the trial where possible.</p>

3. Assessment of impact: ‘Equality analysis’

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equalities groups

	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1	Issues relating to all groups and protected characteristics	<p>>Some cable channel products introduce a narrow gap across the width of the footway. This could potentially capture narrow footwear elements, e.g. stiletto heels. Products chosen for trial have complied with British Standards for street furniture and introduce no greater risk than that associated with drainage gullies and manhole covers.</p> <p>>The cable channel products are designed to capture the charging cable across the width of the footway. However, during operation charging cable is still present on the house curtilage where it enters the channel and where the cable leaves the channel between kerb and electric vehicle. If this free cable is not suitably managed this could again introduce a trip hazard at the edges of the footway. Participants of the trial are given terms of use for the cable channel which stipulate measures they need to take to minimise potential associated trip hazards, These measures include: only having the charging cable in place within the channel when the vehicle is charging; regularly checking cable positioning during vehicle charging; securing excess cable within the</p>

			house curtilage; ensuring cable at kerbside is located along gutter position where necessary and of the minimum length necessary and to a maximum length of (1.5m?). In order to participate in the trial residents will have to sign a user agreement to abide by the terms of use, with the threat that misuse will result in removal from the trial and of the cable channel, and also that the participant will be liable for any injury claims associated with their charging cable or cable channel misuse.
3.2	Sex – identify the impact/potential impact of the policy on women and men.	N/A	Stiletto heeled footwear often worn by people who identify as female is most likely to become accidentally lodged in any narrow gap the channel creates across the footway width. See 3.1 above for further info.
3.3	Pregnancy and maternity	The uneven surface that would be created by trailing cables and above surface cable covers increases the difficulty of safe transit across the footway. This problem would be more acute for a parent pushing a pram and/or supervising young children along the footway. The introduction of cable channels mitigates trailing cables and allows an unobstructed footway whilst an EV is on-street home charging. See 3.1 above for further info.	N/A
3.4	Gender reassignment – identify the impact/potential impact of the policy on transgender people	N/A	Stiletto heeled footwear is most likely to become accidentally lodged in any narrow gap the channel creates across the footway width. See 3.1 above for further info.
3.5	Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both	N/A	The uneven surface that would be created by trailing cables and above surface cable covers increases the difficulty of safe transit across the footway. This problem would be more acute for

	physical, sensory and mental impairments and mental health)		<p>people with a physical disability and/or those who are partially sighted. The introduction of cable channels mitigates trailing cables and allows an unobstructed footway whilst an EV is on-street home charging. See 3.1 above for further info.</p> <p>Cable channels are new products, some with very limited user trials. They are sited at ground level and require physical interaction to insert and remove the charging cable. Disabled people may encounter issues accessing and operating the cable channel as the suppliers had intended.</p>
3.6	Age – identify the impact/potential impact of the policy on different age groups	The uneven surface that would be created by trailing cables and above surface cable covers increases the difficulty of safe transit across the footway. This problem would be more acute for elderly people who are suffering from age related mobility and/or sight issues. The introduction of cable channels mitigates trailing cables and allows an unobstructed footway whilst an EV is on-street home charging. See 3.1 above for further info.	N/A
		Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.7	Race – identify the impact/potential impact on across different ethnic groups	N/A	N/A
3.8	Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	N/A	N/A

3.9	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	N/A	N/A
3.10	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	N/A	N/A
3.11	Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).	The uneven surface that would be created by trailing cables and above surface cable covers increases the difficulty of safe transit across the footway. This practice is driven by not having access to off-street parking, where EV charging can take place away from public hazard. Off-street parking is generally associated with larger properties that have gardens and drives. Comparably only having on-street parking as generally associated with smaller, cheaper properties with limited curtilage. As such the negative impacts of trailing cables can be presumed to have a greater affect on areas with more affordable housing, which tend to also be those areas with a higher index of multiple deprivation. Therefore the negative impacts of trailing cables is more likely affect the lives of the socially disadvantaged as it takes place in their areas of residence and daily activity. Furthermore, the socially disadvantaged are more likely to use walking as their preferred transport due to minimal associated costs. The introduction of cable channels mitigates trailing cables and allows an unobstructed footway whilst an EV is on-street home charging. See 3.1 above for further info.	N/A

3.12	Rural communities* identify the impact / potential impact on people living in rural communities	Rural communities have a mix of housing types. Houses with no-off street parking are still common and especially so in village settings. The negative impacts of trailing cables will still be present in a rural setting. Indeed, due to the sparsity of public charging sites in rural settings there will be increased pressures to adopt the trailing cable approach to accessing on-street home charging, as no public charging alternative is available. The introduction of cable channels mitigates trailing cables and allows an unobstructed footway whilst an EV is on-street home charging. See 3.1 above for further info.	N/A
3.13	Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).	N/A	N/A

*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Trailing EV charging cables across footways.	Monitor reported incidences and enforcement. Understand level of problem and potentially impact of cable channels to mitigate. Enforcement would include direction to apply for a cable channel.	Quarterly assessment of figures	George Bottin, data gathering. Alex Rowbotham, data analysis	Continuous from Jan'23.
Cable channel miss-use creates trip hazard in footway.	Identify terms of use for cable channels, to which trial participants sign up in trial user agreement. Failure to adhere to terms of use will result in cable channel removal at cost to participant.	Fortnightly trial reviews. Informed by random officer trial spot checks and any highways inspection reports.	Alex Rowbotham	Implement at start of trial.

Cable channel malfunction creates trip hazard in footway.	Continuous monitoring of cable channel status by officers and participants. Development of close working relationship with cable channel product suppliers, highlighting issues and feeding into product development process, with timely retrofits when required.	Fortnightly trial reviews. Informed by random officer trial spot checks and any highways inspection reports.	Alex Rowbotham	Implement at start of trial.
Operation of cable channels for EV charging is not accessible to protected users.	Ensure representative range of trial participants. Work with Motability to identify potential participants. Work closely with less able bodied to understand accessibility issues. Inform cable channel manufacturers when issues arise to help improve product.	Fortnightly trial reviews. Informed by random officer trial spot checks and any highways inspection reports.	Alex Rowbotham	Implement at start of trial.

5. Sign off and publishing

Once you have completed this form, it needs to be ‘approved’ by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council’s and/or NHS B&NES’ website. Keep a copy for your own records.

Signed off by: Sophie Broadfield, Director of Sustainable Communities

Date: 2/3/23