

## EQUALITY ANALYSIS (EA)

<b>POLICY/PROPOSAL:</b>	AUTHORITY TO AWARD A CONTRACT FROM A DYNAMIC PURCHASING VEHICLE FOR SERVICES RELATING TO THE SUPPLY, INSTALLATION, OPERATION AND MAINTENANCE OF ELECTRIC VEHICLE CHARGE POINTS
<b>DEPARTMENT:</b>	Communities and Regeneration
<b>TEAM:</b>	Transportation Planning
<b>LEAD OFFICER:</b>	Annekatriin Dennemann
<b>DATE:</b>	January 2023

*NB: Please ensure you have read the accompanying EA guidance and instructions in full.*

### SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Interest in electric cars has grown significantly over the past few years, thanks in part to the Government's ban on petrol and diesel car sales by 2030. In order to support the switch to electric, the Council has sought to support drivers to transition to electric vehicles through the delivery of a growing network of public charging infrastructure on Brent streets.

Following Cabinet approval on 7<sup>th</sup> March 2022 the Council entered into an Infrastructure Funding Agreement (IFA) with Uber on 13<sup>th</sup> April 2022 to further expand Brents' existing network of publicly accessible Electric Vehicle Charging Points (EVCP). Uber has agreed in the IFA to part-fund up to 160 new on-street charge points at 80 locations across Brent. The IFA sets out the terms and conditions of the funding and the requirement for the Council to appoint a Charging Point Operator (CPO) who will contribute the remainder of the required funding as well as supply, install, operate and maintain the charge points.

The charge points delivered through the partnership with Uber will be available for use by its drivers as well as the wider public, thereby supporting the transition to EVs of other Brent drivers too.

Taxi and private hire vehicles are typically high mileage drivers who's vehicles therefore emit significant CO2 as well as Nox, PM10 and PM2.5 pollutants. Supporting drivers, particularly those working in the taxi and private hire ride-hailing sector, to transition to EVs through the supply of conveniently located charging facilities links directly to the Council's climate change and air quality objectives and addresses the growing demand by residents for on street EV charging facilities. The charge points will be help to give Brent residents access to EV charging and make Brent's air cleaner and healthier thereby benefitting all the health of all those living, studying, working or visiting Brent.

The IFA further sets out that the charge points need to be located no further than 500 meters from Uber drivers' homes, this will not however give them priority access to the CPs. Each charge point will be provided with a dedicated EV only bay where EV drivers will be allowed to park whilst charging their vehicle. Suitable locations on the public highway have been identified in existing residential parking bays, subject to further detailed technical feasibility studies, according to a set of criteria that will ensure that locations and footways remain accessible. Considerations included:

- Avoiding disabled parking bays to ensure continued provision (no disabled bays are proposed to be removed),
- Clearance of a minimum of two metres to lamp columns and other electrical infrastructure,
- Avoiding existing street trees or streets where new trees or proposed in order not to affect their roots during installation or limit locations where new trees can be planted;
- Prioritising locations not directly outside residents' front doors instead choosing, where possible, flank walls and street junction locations, and
- Staying clear of private drives.

As part of the procurement process a detailed statement of requirements was set out requiring the CPO to undertake a host of services including the following:

- assess and confirm suitability of pre-selected locations for charge points,
- assess and confirm suitability of alternative locations for charge points as necessary,
- propose suitable charge point models for individual sites as necessary,
- making good of site post installation as necessary.

Detailed on site location feasibility will take into account suitability of available underground electrical connections as well as other factors that may become more apparent once on site. For example, whilst it is anticipated that most charge point columns will be located on the footway, it may in some cases be necessary to provide a build out to position the charge point on so that pedestrian and disabled accessibility on the footway or accessibility for disabled drivers to the charge point itself is maintained or specifically provided.

## 2. Who may be affected by this policy or proposal?

The charge points are intended to provide improved access to electric vehicle charging, especially to those without access to private car parking and therefore not able to install a private charge point at their home. Access to convenient EV charging facilities is seen as a key factor in supporting the transition from petrol and diesel cars to EVs.

Other groups affected by the proposals for additional charge points include:

### **Age and Sex**

While the new charge points offer a newly improved service to Brent residents, older people, women and other some other persons may potentially feel, depending on individual site conditions, vulnerable at the CP locations due to factors such as poor lighting or lack of natural surveillance. To mitigate this CP locations will be chosen to be in well lit places and

additional lighting will be added where found to be necessary so that concerns around visibility often associated with crime or fear of crime can be positively addressed. Wherever possible, sites will be chosen that are overlooked by nearby windows.

One of the positive aspects of the new charge points is that as part of the Council's contract with the CPO apprenticeships will be offered as part of the CPO's stated social value contribution, most likely to younger people. Training and employment opportunities, particularly in the growing green employment market, provide a clear benefit and positive outcome.

### **Race/Ethnicity**

Brent is the second most ethnically diverse borough in London - 64% of the local population is from Black, Asian and other minority groups and over 149 different languages are spoken. Individuals that are not sufficiently fluent in English may find it difficult to follow user instructions displayed in English on the charge points' screens. In order to address this the CPO is required to ensure that information, screens and user interface elements shall:

- be in English by default, preferably with the ability to configure and support additional languages with a preference for languages other than English known to be most commonly spoken in Brent including Polish, Rumanian, Arabic, Somali, Portuguese, Farsi and Urdu.
- Instructions should make use of symbols and/or pictograms where possible.
- Instructions should be presented in an accessible format such as: plain English, large consistent fonts, easily recognisable symbols, avoid jargon and acronyms.

### **Disability**

It is important that no one is left behind in the switch to electric – particularly disabled people or those with specific accessibility requirements. Motability, the charity, have worked with the UK Government Office for Zero Emission Vehicles (OZEV) to sponsor a new accessibility standard for public EV chargepoints, developed by the British Standards Institute (BSI).

As a Publicly Available Specification (PAS), it will be the first standard of its kind to set out what is needed for public charging to be inclusive to everyone – helping to ensure that people with limited mobility, neurodiverse conditions and other accessibility requirements are being considered. It sets out the minimum accessibility requirements for EV chargepoints, and also includes settings where more enhanced accessibility measures can be used.

As part of the tender pack for the supplier and operator contract the Statement of Requirements set out that the design and layout of charge point installations shall maximise accessibility for all users including disabled users. Suppliers were specifically asked to consider provisions in the draft PAS 1899 standard.

In response the successful bidder stated that they will design in accordance with the requirements of British Parking Association, DfT, The Government's UK Electric Vehicle Infrastructure Strategy and PAS 1899:2022 on Electric vehicles - Accessible charging. Their on-street design will adhere to Transport for London's Electric vehicle charging infrastructure: Location guidance for London to ensure they create solutions that minimise intrusion of on-street space and complement the environmental location. Chargepoints (including signage, posts and bollards) will not obstruct pavements or highways, or present a safety risk to street scene users, and the design and layout will maximise accessibility for all users, including for example build outs for CPs to make them more accessible to disabled drivers.

In addition, the CPO is required to provide digital software solutions in apps and online should that seek to comply with W3C accessibility standards to ensure widest possible access including for people with auditory, cognitive, neurological, physical, speech, and visual disabilities.

### **All Groups**

The supplier is also required to ensure that the usage of the proposed chargepoints shall be intuitive for the end user. This includes the instructions and information that is displayed to the user before/during/after a charging session and how this information is communicated. The CPO will offer 24/7 helpdesk coverage to users of the Charging Points.

Charging costs shall be clearly indicated throughout the charging process. The Charging Points will include a contactless payment option for PAYG users benefiting those drivers who don't want to sign up to an App or contract with the CPO.

In their tender submission the successful bidder also noted that on-street charge points need to be positioned carefully to avoid negatively impacting pedestrians and other highways users, and to be accepted by communities, especially where there are already parking and pavement pressures.

There will also be a socio economic impact for those drivers who feel they can't afford an EV. The provision of EVs and EV only bays may be seen as a negative impact on these groups as the EV only bays will reduce in the short to mid term the availability of unrestricted on street residential parking. However, the charge points should to be seen in the context of this transition process towards a point where the majority of cars will be EVs so that more and more drivers will require access to charge points and at least a proportion of these will be supplied on street. As a result, drivers who may not feel that they are in a position to benefit from these charge points yet, may be able to use them in the future. The number of EV only bays is not thought to be significant enough to affect other drivers' access to on street parking in a significant way.

Public consultations will be undertaken for each charge point location informing residents within the individual consultation areas of the proposal to install EV charge points and EV only bays and asking them if they agree or disagree with the proposal. The outcome of each the consultation will determine if that particular charge point will progress towards installation.

In summary, there potentially will be some impact on some individuals but the overall impact is thought to be a positive one and mitigating measures will be put in place wherever applicable and possible.

3. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, there is relevance. The legal duty is set out at Section 149 of the Equalities Act 2010.

Under s.149, public bodies such as council's must, in the exercise of their functions, have "due regard" to the need to:

- Eliminate unlawful discrimination, harassment and victimisation

- Advance equality of opportunity between people who share a “protected characteristic” and those who do not
- Foster good relations between people who share a protected characteristic and those who do not

The equality duty arises when the council is deciding how to provide electric vehicles charging points and EV only bays on the public highway.

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	IMPACT		
	Positive	Neutral/None	Negative
Age	X		
Sex		X	
Race		X	
Disability	X		
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

5. Please complete **each row** of the checklist with an “X”.

SCREENING CHECKLIST		
	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?		X
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	
<p><b>If you have answered YES to ANY of the above, then proceed to section B.</b>  <b>If you have answered NO to ALL of the above, then proceed straight to section D.</b></p>		



## SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

In conducting this analysis a variety of data sources were considered, primarily to develop an understanding of the borough's demographic profile both now and in the future. This has helped identify potential impacts to protected characteristic groups and areas of expected demand.

A list of sources considered is included below:

### Brent Open Data

- Equality Profile of Brent (2019)
- Population Change in Brent (2019)
- Brent JSNA Indices of Deprivation (2019)
- Brent Resident Attitudes Survey (2018)
- Air Quality Brent JSNA 2019/20

### Brent Resources

- Brent Inclusive Growth Strategy (2019 - 2040) and IGS Research Base

### Other

- ONS Mid-Year Population Estimates (2019)
- The Mayor for London's: A Safer City for Women and Girls Strategy (2018 – 2021)
- WHO Report: Air Pollution and Child Health: Prescribing Clean Air (2018)

A summary of the key findings from this research is included below:

### **A growing population –**

The population of Brent increased by 27% between 1998-2018. Projections indicate that this pace of growth is set to continue: the population is expected to rise by a further 25% by 2041, faster than the London average (22%) and more than double the England average (10%). If realised, this would equate to an additional 84,800 residents by 2041.

### **A young, but ageing population –**

Brent has a relatively young population. In 2018, the median age of the population was 35 in Brent, the same as in London, but five years lower than the national average (40 years, England). However, in line with national trends, the population is ageing: by 2041, the number of Brent residents aged 65 and over is projected to increase by 85% – an additional 34,900 older residents by 2041. The child population is also expected to grow, albeit more slowly, 12% by 2041 (+8,600 children).

**Disability –**

Around one in seven Brent residents have a long-term health problem or disability that limits their day-to-day-activities in some way. The prevalence of disability rises sharply with age: more than half of all residents aged 65 and over had a long-term health problem or disability.

**Race –**

Almost two thirds (65%) of the Brent population are from Black, Asian and minority ethnic groups. Brent’s largest single ethnic group is the Indian population – who comprise 17% of residents – the fourth largest in London. Brent is the second most ethnically diverse borough in London, after Newham (according to the Simpson’s Diversity Index).

**Sex –**

The gender split in the population is 51% male and 49% female. The proportion of men is highest in the 20-34 age group where they comprise 54% of the population. In contrast, women make up a higher proportion of the Borough’s elderly population: 62% of those aged 85 and over are female.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE	
<b>Details of impacts identified</b>	<p><b>Positive</b></p> <ul style="list-style-type: none"> <li>• Provision of electric vehicles charge points supports the transition to EVs and therefore supports the reduction of CO<sub>2</sub>, NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions. Studies have shown that air pollution affects children aged under five in uniquely damaging ways. Brent has a higher proportion of children aged under five (8% - estimated 28,797) compared to the rest of the UK (5%), and while overall air pollution in Brent is declining, there remain several air quality hotspots in the Borough. Older people too are particularly vulnerable to poor air quality.</li> </ul> <p>The social value aspects of the contract includes:</p> <ul style="list-style-type: none"> <li>○ 290 trees that will be planted over the contract period to support improvements to Brent’s air quality.</li> <li>○ Minimum of 6 new apprentices will be trained and/or new sustainable jobs and/or new jobs will be created over the contract period.</li> </ul>



	<ul style="list-style-type: none"> <li>○ Carrying out 5 on street demonstrations in the first 12 months of this contract</li> <li>○ Carrying out 3 virtual training dates in the first 12 months of this contract</li> <li>○ Offering digital skills courses for residents and businesses</li> <li>○ Offering training courses for Resident Associations and voluntary groups</li> <li>○ Contributing towards the sponsorship of community led initiatives</li> <li>○ Leading workshops in schools and colleges targeted at underrepresented or disengaged groups</li> <li>● Additional lighting provided in areas where required ensures all customers, particularly from vulnerable groups such as the elderly, feel safe to charge.</li> </ul>
<b>DISABILITY</b>	
<b>Details of impacts identified</b>	<p><b>Positive</b></p> <ul style="list-style-type: none"> <li>● Around one-in-seven (estimated 46,168) Brent residents have a long-term health condition or disability that limits their day-to-day activities.</li> </ul> <p>Due regard to the accessibility of the EV charging services provided would have a positive effect on this group:</p> <ul style="list-style-type: none"> <li>○ Systems for cashless charging services are designed against the background of the W3C Web Content Accessibility Guidelines and to be accessible to individuals with a range of disabilities.</li> </ul> <p>Arrangements to support impairment or learning disability include:</p> <ul style="list-style-type: none"> <li>○ 365/24/7 Customer Service Helpdesk in partnership with the AA. Service users are fully supported with using chargepoints and all communities can access the charging solution.</li> <li>○ Site designs compliant with B 8300-1:2018. Socket height and interface are positioned to improve accessibility.</li> <li>○ Plans for alignment with future BSI/Motability accessibility standards to ensure continued to delivery of the latest in accessibility.</li> <li>○ Trialling specialised accessible hardware when it becomes available within Brent to drive forward R&amp;D to provide a fully accessible solution.</li> <li>○ Adhering to PAS: 1899:2022 requirements.</li> </ul>

	<ul style="list-style-type: none"> <li>○ Dedicated disabled bays and wheelchair accessible islands provided where necessary supporting equal access to charging for all Brent residents.</li> <li>○ Clear notes on media platforms such as ZapMap ensure users can easily find accessible chargepoints.</li> <li>○ Additional lighting provided in areas where required ensures all customers, particularly from vulnerable groups, feel safe to charge.</li> <li>○ Customers with hearing impairments will benefit from the simplicity of downloadable apps.</li> <li>○ Near Field Communication (NFC) technology for payments, which can be a welcome solution for many customers. Customers have a choice of payment options, including contactless, pay-as-you-go, RFID cards and in-app payment.</li> <li>○ Chargepoint icons are visually colour coded to signal if they're currently in use (pink) or available (green).</li> <li>○ Instructions will make use of symbols and/or pictograms where possible for those with learning difficulties or remaining language barriers.</li> </ul>
<b>RACE</b>	
<b>Details of impacts identified</b>	<p><b>Neutral</b></p> <p>The CPO is required to ensure charge point information, screens and user interface elements shall:</p> <ul style="list-style-type: none"> <li>○ Be in English by default, preferably with the ability to configure and support additional languages.</li> <li>○ Preferred additional language support for languages most commonly spoken in Brent: Polish, Romanian, Arabic, Somali, Portuguese, Farsi, Urdu.</li> <li>○ Instructions should make use of symbols and/or pictograms where possible.</li> <li>○ Presented in an accessible format such as: plain English, large consistent fonts, easily recognisable symbols, avoid jargon and acronyms.</li> </ul>
<b>SEX</b>	

<b>Details of impacts identified</b>	<p><b>Neutral</b></p> <ul style="list-style-type: none"> <li>○ Additional lighting provided in areas where required ensures all customers, particularly from vulnerable groups such as women, feel safe to charge.</li> </ul>
<b>SEXUAL ORIENTATION</b>	
<b>Details of impacts identified</b>	<p><b>Neutral</b></p>
<b>PREGANCY AND MATERNITY</b>	
<b>Details of impacts identified</b>	<p><b>Neutral</b></p>

<b>RELIGION OR BELIEF</b>	
<b>Details of impacts identified</b>	<b>Neutral</b>
<b>GENDER REASSIGNMENT</b>	
<b>Details of impacts identified</b>	<b>Neutral</b>
<b>MARRIAGE &amp; CIVIL PARTNERSHIP</b>	
<b>Details of impacts identified</b>	<b>Neutral</b>

3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No.

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

The Brent Long Term Transport Strategy set out objectives to support Brent drivers to transition to EVs. The strategy was consulted on borough wide. Following a good and representative level of support for its aims and objectives the strategy was formally approved by Cabinet.

Further public consultation of local residents will be undertaken on a site by site basis.

5. Please detail any areas identified as requiring further data or detailed analysis.

There will also be a socio economic impact for those drivers who feel they can't afford an EV. The provision of EVs and EV only bays may be seen as a negative impact on these groups as the EV only bays will reduce in the short to mid term the availability of unrestricted on street residential parking.

However, the charge points should to be seen in the context of this transition process towards a point where the majority of cars will be EVs so that more and more drivers will require access to charge points and at least a proportion of these will be supplied on street. As a result, drivers who may not feel that they are in a position to benefit from these charge points yet, may be

able to use them in the future. The number of EV only bays is not thought to be significant enough to affect other drivers' access to on street parking in a significant way.

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

n.a.

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

Remote as well as on site systems will be put in place to monitor the EVCPs' level and pattern of usage, functionality and performance so that the anticipated growth in usage of charge points and service performance can be analysed. This will inform any adjustments to the EVCPs service as necessary.

## SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The new electric vehicle charging points will prove an overall a positive impact for all due to their role in reducing air pollution. They will help to meet governmental, mayoral and council targets to improve air quality through and by supporting the transition to EVs by expanding Brent's network of EVCPs to provide Brent's drivers with more opportunities to charge their EVs in the near future and for years to come.  
Continued review and monitoring will be undertaken to establish if any concerns or issues arise and to evaluate their effectiveness.

## SECTION D – RESULT

<i>Please select one of the following options. Mark with an "X".</i>		
<b>A</b>	<b>CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED</b>	<b>X</b>
<b>B</b>	<b>JUSTIFY AND CONTINUE THE POLICY/PROPOSAL</b>	
<b>C</b>	<b>CHANGE / ADJUST THE POLICY/PROPOSAL</b>	
<b>D</b>	<b>STOP OR ABANDON THE POLICY/PROPOSAL</b>	

## SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Monitor and evaluate the EVCPs' effectiveness to explore any arising issues and review the EA where necessary.	Continued improvement of EVCP service for EV drivers and air quality for all as EV & charge point technology and their uptake evolve.	Lead Project Officer (tbc)	Initially Annually for the duration of the contract.

## SECTION F – SIGN OFF

Please ensure this section is signed and dated.

<b>OFFICER:</b>	Annekatriin Dennemann 17.01.2023
<b>REVIEWING OFFICER:</b>	Angela Chaudry 23.01.2023
<b>HEAD OF SERVICE:</b>	Gerry Ansell 24.01.2023