

Record of Equality and Rights Impact Assessment

Part 1: Background and Information

(a) Background Details

Please list ERIA background details:

ERIA Title and Summary Description: Energy Efficient Street Lighting Programme (EESLP)

Service Area	Division	Head of Service	Service Area Reference No.
Place Management	Infrastructure	Gavin Barwell	2017P40

(b) What is being impact assessed?

Describe the different policies or services (i.e. decisions, projects, programmes, policies, services, reviews, plans, functions or practices that relate to the Corporate ERIA Title):

Policies and Services	Date ERIA commenced
<p>The T&E Committee on 14 January 2014 approved the proposal to use energy efficient white light technologies in all future Street Lighting installations. This approval was secured following a successful pilot project.</p> <p>Funding was secured (from Salix) that allowed 7,020 lanterns located across the city, to be replaced with LED technologies.</p> <p>This report provides information on lessons learned from the project and provides a Business Case/Financial Model to support a full roll out of LEDs across the city.</p>	16/06/2015
<p>The project covers the replacement of approximately 54,000 street lights with LED lanterns to deliver an ongoing reduction in street lighting energy and maintenance costs.</p> <p>To allow lighting levels in streets to be remotely monitored and adjusted in response to changing demands on the service, and changing dynamics of traffic flows and street usage, the project also covers the introduction of a Central Management System (CMS).</p> <p>It is estimated that the installation programme will replace all lanterns within a three year period and minimise the impact on residents and businesses.</p>	27/01/2017

(c) When is it due to be reviewed? (insert furthest away date if question relates to a number of review dates) **Quarterly until 2020**

(d) ERIA Team

Please list all ERIA Team Members:

Name	Organisation / Service Area
Alan Simpson	CEC Street Lighting & Traffic Signals Infrastructure Manager
Marshall Gillespie	Gillespie Lighting Designer
Jack Keillor	Currie & Brown

Part 2: Evidence and Impact Assessment

(a) Evidence Base

Please record the evidence used to support the ERIA. Any identified evidence gaps can be recorded at [part 3a](#). Please allocate an abbreviation for each piece of evidence.

Evidence	Abbreviation
1. Knowledge Partnership conducted a door-to-door survey following the original pilot project which gathered individual concerns from residents. 89% said they were satisfied with the new lights.	Pilot Project
2. Feedback from complaints from residents upgrade in the Salix Project.	Selix Project
3. Information from North Neighbourhood Manager re: Stronger North Project which included increasing lighting levels in certain areas following involvement of the localities team.	Stronger North Project

(b) Rights Impact Assessment – Summary

Please describe all the identified enhancements and infringements of rights against the following ten areas of rights. Please also consider issues of poverty and health inequality within each area of rights:

- Life
- Health
- Physical security
- Legal security
- Education and learning
- Standard of living
- Productive and valued activities
- Individual, family and social life
- Identity, expression and respect
- Participation, influence and voice

Please indicate alongside each identified enhancement or infringement the relevant policy or service (see [part 1b](#)) and relevant evidence (see [part 2a](#)).

Summary of Enhancements of Rights

The change from old yellow light to new white light lanterns has been proven to enhance community safety and will contribute to the right to Physical security and Individual social life.

Similar findings have been reflected in programmes delivered across the country.

Improving the street lighting asset will positively contribute to all the protected characteristics and will improve the lives and safety of all residents and visitors to the city. This will be achieved as new lanterns have a longer lifespan and are more reliable.

Lessons learned from the last project will restrict the number of design classes and distribute light over a wider area in response to feedback from residents. This minor change will address the negative perceptions of residents and have only limited effect on the level of savings achieved.

Summary of Infringement of Rights

Can these infringements be justified? Are they proportional?

None identified at this stage.

There is expected to be no infringement of Rights. Residents perceptions will be gathered and analysed throughout the project. Concerns will be addressed if there are a significant number of issues raised and will be progressed with support from Localities and Elected Members to ensure the scheme meets the requirements of the local community.

If concerns raised by residents are found to be of merit, these can be addressed promptly through the use of a Central Management System (CMS).

(c) Equality Impact Assessment – Summary

Please consider all the protected characteristics when answering questions 1, 2 and 3 below. Please also consider the issues of poverty and health inequality within each protected characteristic:

- Age
- Disability
- Gender identity
- Marriage / civil partnership
- Pregnancy / maternity
- Race
- Religion / belief
- Sex
- Sexual orientation

1. Please describe all the positive and negative impacts on the duty to eliminate unlawful discrimination, harassment or victimisation. Please indicate alongside each identified impact the relevant policy or service (see [part 1b](#)) and relevant evidence (see [part 2a](#)).

Positive Impacts

The installation of more white lights will positively impact on all of the protected characteristics, but in particular in areas of deprivation and the city centre, where the

probability for crime is increased. Data on Crime Statistics will help to ensure the correct class of lighting is attributed to particular areas of the city. Through the use of local intelligence, key locations will also be given specific consideration in the design process i.e. the location of places of worship, hospitals and drop-in centres, in an effort to try to eliminate discrimination, harassment or victimisation.

Negative Impacts

The majority of complaints received were associated with the P4 Design Class, whereby the limited distribution of light was the main cause for concern (i.e. residents footpaths and doors were no longer lit). In future projects, the use of P4 Design Class will be limited, Design Class P3 will be used more widely and the lanterns used will distribute the light over a wider area. This will have the effect of increasing the light spillage without significantly affecting the energy and carbon tax savings resulting from the use of LEDs.

2. Please describe all the positive and negative impacts on the duty to advance equality of opportunity (i.e. by removing or minimising disadvantage, meeting the needs of particular groups that are different from the needs of others and encouraging participation in public life)? Please indicate alongside each identified impact the relevant policy or service (see [part 1b](#)) and relevant evidence (see [part 2a](#)).

Positive Impacts

The installation of more white lights will positively impact areas of deprivation and the city centre where the probability for crime is increased. Data on crime statistics will help to ensure the correct class of lighting is attributed to particular areas of the city. Through the use of local intelligence, key locations will also be given special consideration i.e. the location of places of worship, hospitals and drop-in centres.

Identifying the correct Design Class and lighting levels will increase the level of safety felt by all groups within the protected characteristics. By giving special consideration to key locations, such as places of worship, drop-in centres etc, it is hoped that this will provide an advancement of equality of opportunity to all of the Protected Characteristics but in particular to Age, Disability, Race, Religion and Sex.

Negative Impacts

None

3. Please describe all the positive and negative impacts on the duty to foster good relations (i.e. by tackling prejudice and promoting understanding)? Please indicate alongside each identified impact the relevant policy or service (see [part 1b](#)) and relevant evidence (see [part 2a](#)).

Positive Impacts

None

Negative Impacts

None

Part 3: Evidence Gaps, Recommendations, Justifications and Sign Off

(a) Evidence Gaps

Please list all relevant evidence gaps and action to address identified gaps.

Evidence Gaps	Action to address gaps
Feedback from EARN (Equality and Rights Network)	Telephone messages and emails to Caroline Gibb explaining the project and asking if appropriate to present to group involved in the Equalities Contacts, however, no feedback received.
Further Consultation with key groups within the Protected Characteristics is required to ensure evidence is available to support the Council's Public Sector Duty. Door-to-door information was helpful and gathered some information on age and disability.	Analysis of the feedback and development of the Project Communications Strategy will address feedback and full briefing of interested public-facing parties to address questions/queries prior to being raised. The Communications Strategy will include the Contractor providing information to residents (through letter drops) and road users (through on-street signage).
Street Crime statistics were not used in the assessment of the appropriate design class.	Street Crime statistics were considered but it was decided not to explore further as the Pilot and Salix projects were not in one area but implemented in specifically targetted lanterns (replacing the most inefficient lanterns) across the city making any analysis before and after impossible to assess. Looking forward, analysis will be undertaken of street crime statistics following the introduction of the energy efficient lanterns.
Vehicle accident statistics were not used in the assessment of the appropriate design class.	Vehicle accident statistics were considered but it was decided not to explore further as the Pilot and Salix projects were not in one area but implemented in specifically targetted lanterns (replacing the most inefficient lanterns) across the city making any analysis before and after impossible to assess. Looking forward, analysis will be undertaken of vehicle accident statistics following the introduction of the energy efficient lanterns.
Accidents (slips, trip and falls) reported to the Council in pilot areas was not analysed in the assessment of the appropriate design class.	Slips, trips and falls statistics were considered but it was decided not to explore further as the Pilot and Salix projects were not in one area but implemented in specifically targetted lanterns (replacing the most inefficient lanterns) across the city making any analysis before and after impossible to assess. Looking forward, analysis will be

Evidence Gaps	Action to address gaps
	undertaken of accident statistics following the introduction of the energy efficient lanterns.

(b) Recommendations

Please record SMART recommendations which may include actions to

- (i) eliminate unlawful practice or infringements of absolute rights;
- (ii) justify identified infringements of rights; or
- (iii) mitigate identified negative equality impacts
- (iv) further advance equality and rights, and promote good relations.

Recommendation	Responsibility of (name)	Timescale
To continue to use white light technology in all future street lighting installations	Alan Simpson	Ongoing
Set up a specific project team to ensure the appropriate level of resource is identified to deliver future projects. Evidence from the last project has shown that a project of this size cannot be undertaken within the existing staffing levels.	Jack Keillor	Ongoing
Develop a Communication Plan, following consultation with Elected Members and Localities based Roads Teams.	Chris Wilson	Ongoing
Carry out ongoing updates of the Equality and Rights Impact Assessment taking into account commissioning of street lighting designers, feedback from interested groups (EARN) and from complaints and observations received the key Protected Characteristics (older people and people with disabilities).	Jack Keillor	October 2017
Review of the Street Lighting Design Guidance for use on all future projects which involve Street Lighting.	Phil Noble	August 2017

(c) Sign Off

I, the undersigned, am content that:

- (i) the ERIA record represents a thorough and proportionate ERIA analysis based on a sound evidence base;
- (ii) the ERIA analysis gives no indication of unlawful practice or violation of absolute rights;
- (iii) the ERIA recommendations are proportionate and will be delivered;
- (iv) the results of the ERIA process have informed officer or member decision making;
- (v) that the record of ERIA has been published on the Council's website / intranet, or
- (vi) that the ERIA record has been reviewed and re-published.

Date	Sign Off (print name and position)	Reason for Sign Off (please indicate which reason/s from list (i) to (vi) above)
25/04/17	Gillian Meikle, Improvement Officer	(i), (ii), (iii), (iv) and (vi)
25/04/17	Alan Simpson, Street Lighting & Traffic	(i), (ii), (iii), (iv) and (vi)

	Signals Infrastructure Manager	
26/04/17	Cliff Hutt, Specialist Service Manager - Infrastructure	(i), (ii), (iii), (iv) and (vi)