

**Stage 1 – Scope the assessment and identify the aims of the policy**

### 1.1 Aim of the Policy

To encourage walking, cycling and the use of public transport as principal means of commuting to university for work, study and for travel by staff on University Business.  

(Abstract from initial impact assessment)

### 1.2 Outcomes it seeks to achieve

1. To support planning applications  
2. Help inform the design of development proposals as part of the Estates Strategy, for example, advice on cycle parking.  
3. Achieve a significant culture change in the University toward more sustainable travel.  
4. Contribute toward the University’s Environmental Strategy measured by carbon emission targets set as part of the policy.  
5. Achieve fairer arrangements associated with transport that better reflect the differing needs of individuals.  
6. Contribute and support the University’s Development Framework Plan.

### 1.3 Drivers for change

1. New planning regulations.  
2. Environmental/Health improvements including:-  
   a. Reducing total carbon emission of University associated travel.  
   b. Improving the environmental quality of the campus and surrounds.  
   c. Encouraging a healthier lifestyle for students and employees.  
3. Cost of provision against revenue.  
4. Better utilization of limited space on campus.

### 1.4 Who implements? (Who needs to be aware of and utilize the outcome of this assessment?)

- STIG. The University has appointed a Sustainable Travel Officer, Dr Sandra Lee, to coordinate the whole Travel Plan process.  
- Estates and Infrastructure Strategy Committee.  
- Facilities (Tim Yates) Car park management including charging and security arrangements.
• Property Services (Grant Charman) Planning and development of Estate

• Leicester City Council.

1.5 **Who will be affected by the policy and the way the policy is implemented?**

• Staff generally through travel to work arrangements.
• Students generally through travel to study arrangements noting that their arrival times are very variable.
• Disabled staff and students.
• Carers who often arrive at the University at non standard times of whom the majority are women.
• Part time staff who often arrive at the University at non standard times of whom the majority are women.
• Women generally on the basis that walking and cycling will increase the requirement of a secure environment for so doing in the area surrounding the University.

1.6 **How does the policy fit with the University’s wider objectives?**

• Supports a reduction in carbon emissions to meet strategic targets.
• Supports the need for development (which is sustainable).
• Potential to support the University’s corporate equality objectives to
  o Promote equality of opportunity for all….
  o Make reasonable adjustments and promote equality of opportunity for disabled people in accordance with statute.

1.7 **Who will benefit from the policy and how?**

**The University as a whole**

• Able to submit planning applications.
• Reduction in carbon emissions to meet the strategic targets.
• Increased opportunity to utilise previous parking space for sustainable development.
• Improved student experience through perceived more equitable arrangements.
• Greater productivity from staff through healthier travel arrangements & possibly increased flexible working arrangements (and consequently reduced stress).
• Reputation improvement and increase in positions in league tables, such as the Green League.
• More business – Many companies wishing to deal with the University require a sustainable travel plan to meet their own Corporate Social Responsibility requirements. More productive relationships with local authorities and public transport providers following implementation of the plan (such as improved road and transport links and reduced costs)

**Students and staff**
• Health benefits resulting from healthier travel arrangements.

• Improved campus environment.

• Smoother transport system.

• For some a reduction in travel cost through being encouraged/forced to seriously review travel options.

• Greater awareness of carbon footprint may encourage improved lifestyle choices.

• Disabled staff and students may benefit from targeted and considered provision.

• Carers who may arrive on campus at non standard times may benefit from targeted measures.

Stage 2 – Consider the evidence

2.1 Travel survey – response rates and demographics.

An overall 70% response rate was obtained from staff which is an extremely high return. It will be utilized to inform this equality impact assessment.

- Gender – the survey noted a slightly higher response rate from female members of staff (58%). However the University employs more females (53%) so the survey is almost exactly balanced.
- Disability – 5% of staff responding indicated a disability. The total % of staff declaring a disability is 5% therefore this is a representative response.

An overall 7.8% response rate was obtained from students. Because of the nature of this group the survey concluded that this was representative given that over 1300 responses were received. It can therefore be utilized to inform this impact assessment.

- Gender – a higher number of responses were received from female students (57%) once again partially explained by the University female student representation being 53%.
- Disability – response rate was 2%. This is an under representation as our student disability declaration rate is 6% not counting distance learners.

The initial equality impact assessment concluded that the policy, in equality terms, is not relevant to age, race, sexual orientation or religion. Other than age, data has not been correlated on the basis of these equality strands.

2.2 Assessment of impact on different groups

Evidence of impact will be mostly gathered from open ended responses received through the Travel Survey and are recorded under the next section.
Stage 3 – Identify the potential equality issues and factors

It needs to be kept in mind that as well as avoiding discrimination through the adverse impact of policies on some groups the University also has a duty to actively promote equality of opportunity. This sets it apart, as a public body, from the requirements placed on private organisations which are simply to comply with individual rights equality legislation. The University has specifically undertaken to ‘…’ Promote equality of opportunity for all, equal participation and harmonious relations’.

3.1 Drop off and collection of children and adult carers. Just over 15% female respondents and about 8% male respondents cited this as a reason for car use (Figure 4.2). The survey noted that this group represented a challenge in terms of persuading a change in practice (para 4.4.12). The potential equality issue is that with limited car park spaces, staff who drop off children, arrive at a time when spaces may no longer be available. This is an adverse impact that (by a factor of approximately two thirds to one third) affects females. It is a significant impact in terms of potential time lost, stress associated with anticipating and facing the problem of finding a parking space and the time pressures that might be created when a large detour to alternative parking is required with probable additional distance to walk/carry books etc. If this factor is taken into account when determining who shall have the opportunity to purchase a parking permit it will also be necessary to close the gap between numbers of permits allocated and numbers of parking spaces in order to remove the adverse impact. Alternatively specific spaces could be allocated for those arriving after a certain time but it is noted that such a policy will have the effect of limiting total spaces utilized and be difficult to police. This same issue also applies (in much lesser numbers) to those with adult caring responsibilities.

3.2 Disabled parking. A recommendation for the travel plan arising from the survey (para 9.6.1 of the staff survey) advises the promotion of participation in the Blue Badge Scheme to staff and students with medical conditions. The criteria for obtaining a Blue Badge requires that successful applicants have far more severe disabilities than those who fall within the definition of disability set by the Disability Discrimination Act (DDA) (see appendix 1 for the definition). Although it would be quite wrong to suggest that even half those who come within the definition of disability have sufficiently significant mobility problems to warrant an on-campus parking facility nevertheless there will be a gap between those eligible for a Blue Badge and those who would find genuine difficulty if they could not use a car and park on the campus. The current disabled car parking regulations for the University (shown at appendix 2) do, to a degree, recognize this issue although the concept of Registered Disabled no longer exists and has been replaced by the definition given under the DDA. It is suggested that we need to develop a process to fill the gap between Blue Badge and those who have significant mobility problems such that the University fulfills its legal duty to promote equality of opportunity and has a sufficiently robust process that roots out abuse. (It should also be noted that such abuse, apart from impacting on the University as a whole, also has the effect of discriminating against those who genuinely need mobility assistance). A criteria test needs to be developed.

Note - guidance published by the Department of Transport (Inclusive Mobility) makes reference to numbers of spaces for disabled parking in private car parking. This refers to situations where members of the public park in an organisation’s car park and therefore numbers of disabled visitors are unknown on a day to day basis. Guidance as to numbers of spaces provided are designed to accommodate an estimated maximum number of disabled visitors at any one time. In this case the University will know how many disabled people it is likely to need to accommodate.
3.3 **Security issues near the University.** A feature of both the staff and student survey outcomes was a reference to improved lighting or other solutions to improve actual or perceived security when walking or cycling. This is an equality issue because it impacts more significantly on females. Improvements here have the potential to both contribute to some of the central outcomes the policy is trying to achieve (see 1.2 (3) & (4)) and promote equality of opportunity. Students indicated that improved lighting and security would most encourage them to start walking or walk more often. In the staff survey 171 staff cited lighting and security as their first, second or third choice for improvements. It is suggested that a creative approach is needed here.

3.4 **Impact on part time staff.** A similar set of issues exist for part time staff as those described under 3.1 above in relation to childcare. This is an equality issue because a predominance of part time staff are female (74%). Solutions may be similar or the same as those that might arise to reduce adverse impact on those dropping children off before arriving at the University. A further issue for part timers relates to permit charges. Consider proportionate charging to hours worked, e.g. related to the number of hours per week the employee is likely to make use of a parking facility.

3.5 **Flexible working.** Although in itself not an equality issue, flexible working does have the potential to alleviate a number of problems posed through an examination of travel to work including that of severe peaks of transport movement and periods of time when parking and cycle related facilities (e.g. showers) are needed. In relation to the equality matters identified through this impact assessment this has most impact on the timing of parking requirements and the absolute number of parking spaces required for both able bodied and disabled users. In this context home working is a relevant solution that represents almost the ultimate solution to the achievement of the outcomes described under paragraph 1.2 above.

**Stage 4 Consultation**

This has been achieved through the Travel Survey though further consultation will be required to support the process of implementation.
Stage 5 – Recommendations for the policy

5.1 Drop off and collection of children and adult carers. The criteria for establishing those who will be given the option to purchase a parking permit should include the factor of dropping off children and also those with significant adult caring responsibilities. It is also proposed that the difference between the number of permits sold and the total number of spaces available will be reduced to increase the likelihood that such a person will find a parking space. The adverse impact of being unable to purchase a permit at all would be substantial on those with child care responsibilities. Consequently it is recommended that except for, say, those living within a stated minimum distance from their place of work, the criteria of dropping off children under an agreed age (or disabled children) in itself is sufficient to determine right to purchase a permit. For those dropping off older children this should be an important criterion to be considered in the allocation of right to purchase permits. In a very small number of cases those with disabled children and living close to the University may require specific consideration. It is also recommended that a robust proof of entitlement process be established to ensure only genuine needs are facilitated.

5.2 Disabled parking. Criteria need to be established to determine which disabled staff and students are to be provided with permits allowing them to park on the campus in designated spaces. There will be those who are disabled and for whom it is a requirement under the DDA to provide such a facility and who cannot obtain a Blue Badge.

5.3 Security issues near the University. It is understood that additional lighting will not be forthcoming in the areas of concern. There are however other improvements that can be made. The following are recommended.

(1) Publicity is used to encourage the use of the safest paths (e.g. directly across the centre of Victoria Park rather than along the hedgerows). Increased confidence will lead to increased usage which in itself will increase confidence.

(2) At peak times it may be possible to utilize a ‘Street Angel’ voluntary system where volunteers dressed in a recognizable bright garment will be using the path or patrolling (on foot or on bikes).

(3) The situation on popular routes should be very publically monitored. Where monitoring strongly suggests that the route is safe this may improve perception of safety, increased confidence and therefore increased usage. Where monitoring suggests concern such data may be very useful to support a case for safety improvements to the route.

5.4 Impact on part time staff. Staff arriving at non standard times later than 9am face difficulty finding parking spaces. Again the position of part time staff should be reflected in the criteria applied to permit availability. Charges should recognize less time of use though it is recognized that it would be reasonable to calculate a standard fixed element of the total charge to reflect the fixed costs of providing a parking space and the fact that a space used by a part time member of staff may be under utilized as a consequence of them leaving earlier than full time staff.

5.5 Home working The impact assessment recognizes that a reduction in travel to work would reduce the total demand for parking. This in turn would help address all parking related equality issues as well as the central theme of transport and carbon emission. Where the nature of a person’s role is such that home working has a neutral or indeed enhanced effect on their productivity it must be beneficial. It would certainly contribute positively to this policy. The impact assessment recommends that the advantages and drawbacks of home working be further investigated. It is noted that IT services provide a ‘Working From Home’ help service.
Stage 6 – Equality objectives and targets
(In addition to the recommendations made above)

1. Carry out consultation prior to implementation on definite proposals with staff and student representatives. (STIG)
2. Set up an easy access feedback process that allows users of parking facilities to share their experience so that the impact of a new permit system can be monitored and fine tuned over time. Such monitoring should ensure attempts are made to record data on gender, disability and adult caring responsibility. Allow for open ended feedback to ensure differential impact is not evident on other equality grounds. (Estates)
3. Set up a similar monitoring process embracing other travel to campus aspects (e.g. relating to security in the vicinity of the University). (Estates)
4. Review the results of monitoring in one year to assess impact on the basis of gender and disability. (STIG Equality Impact Assessment Group)
5. Review the efficacy of alternative working arrangements including home and remote site working. (HR)

Stage 7 – Information collection and monitoring arrangements
Described above.
At this stage in the development of the impact assessment process we shall monitor the achievement of agreed actions within the Equalities Unit.

Date on which report for publication produced

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Date: …23rd February 2010………………………………………………………………………………
Appendix 1

Definition of Disability (DDA 1995)

The Disability Discrimination Act (DDA) defines a disabled person as someone who has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities.

People with HIV, cancer and multiple sclerosis are deemed to be covered by the DDA effectively from the point of diagnosis, rather than from the point when the condition has some adverse effect on their ability to carry out normal day-to-day activities.
Disabled Car Parking Permits

Background

Disabled parking spaces are available on many of the Campus car parks; they are designated by signs and the standard yellow ‘disabled’ logo. The use of these spaces is regulated by the University of Leicester Car Parking Regulations.

Blue Badge Scheme

Visitors displaying the Government issued Blue Badge Scheme parking permit are entitled to park in these bays. Members of staff or students who are Registered Disabled may also park in these spaces but should also apply for a free disabled parking permit from the University – these are blue in colour and should be displayed alongside the square Blue Badge permit.

Non Registered Disabled or Temporary Disabled

Members of staff or students who believe they should be entitled to park in the disabled bays but are not Registered Disabled, (maybe due to temporary disablement or lesser disablement), must obtain a written recommendation for a disabled parking bay parking permit from one of the following:

- General Practitioner
- Hospital Doctor
- UoL Staff Welfare
- UoL Occupational Health

The recommendation is to include a date after which the individual will no longer need a disabled parking space permit.

Form PK7 available from the Estates Web Site is to be used to apply for a permit. UoL Disabled Parking Permits are issued free of charge to applicants, except where the disability is temporary in nature and normal car park permit has already been issued. Current parking permit charges will then apply.