

EQUALITY IMPACT ASSESSMENT (EQIA): SCREENING FORM

Introduction to the EQIA screening process

A successful EQIA screening will look at 5 key areas:

1. **Identify the Policy, Project, Service Reform or Budget Option to be assessed**
A clear definition of what is being screened and its aims
2. **Gathering Evidence & Stakeholder Engagement**
Collect data to evidence the type of barriers people face to accessing services (research, consultations, complaints and/or consult with equality groups)
3. **Assessment & Differential Impacts**
Reaching an informed decision on whether or not there is a differential impact on equality groups, and at what level
4. **Outcomes, Action & Public Reporting**
Develop an action plan to make changes where a negative impact has been assessed. Ensure that both the assessment outcomes and the actions taken to address negative impacts are publically reported
5. **Monitoring, Evaluation & Review**
Stating how you will monitor and evaluate the **Policy, Project, Service Reform or Budget Option** to ensure that you are continuing to achieve the expected outcomes for all groups.

1. IDENTIFY THE POLICY, PROJECT, SERVICE REFORM OR BUDGET OPTION:

a) Name of the Policy, Project, Service Reform or Budget Option to be screened

Glasgow's Active Travel Strategy 2022-2031

b) Reason for Change in Policy or Policy Development

Glasgow City Council is refreshing its transport-related strategies and plans, including the Glasgow Transport Strategy (GTS), which provides an overarching framework for transport decision-making in the city over the next decade. Glasgow's Active Travel Strategy 2022-2031 is being developed as part of this refresh, and will supersede the Strategic Plan for Cycling 2016-2025.

The Active Travel Strategy (ATS) aims to achieve significant modal shift across the city by realising its vision that "walking, wheeling and cycling will be the first and natural choice for everyday journeys, for people of all ages and ability, to travel locally to schools, to shops, to work, and connect to the city centre". The strategy creates a step change in how people and goods move around our city and in the design of our streets and public spaces, and is also a direct response to the climate emergency and the City Council's commitments to achieving net zero carbon, a minimum reduction of 30% of car kilometres travelled, and a commitment to achieve '[Vision Zero](#)' where no-one is killed or seriously injured on our roads, streets, cycle ways and footpaths - all by 2030.

The ATS is also being developed closely alongside the [Liveable Neighbourhoods Plan](#) (LNP) which aims to create healthy, accessible and safe streets and places for people that facilitate play, walking and cycling; 'Active Travel' and 'Everyday Journeys' are among its core thematic.

c) List main outcome focus and supporting activities of the Policy, Project, Service Reform or Budget Option

The outcomes from the ATS align with those of the [Glasgow Transport Strategy](#), as well as tying in with the overarching outcomes for the City - and are:

- Transport contributes to a successful and just transition to a net-zero carbon, clean and sustainable city.
- Transport has a positive role in tackling poverty, improving health and reducing inequalities.
- Transport contributes to continued and inclusive economic success and a dynamic, world class city.

- Places are created where we can all thrive, regardless of mobility or income, through liveable neighbourhoods and an inclusive City Centre.

The ATS aims to engender significant modal shift in Glasgow and to tackle the barriers to achieving this the ATS is shaped by three Themes, each with further sub-themes, as outlined below:

- **Connectivity, People and Place: rebalancing our streets and spaces**

Sub-themes: Neighbourhoods; Networks and Connections

Sets out the changes to the city's street environments which are required to enable people to walk, wheel or cycle more for everyday journeys. A key output will be the City Network - a high quality, functional, segregated cycle network across the city. [The Interim Delivery Plan for the City Network](#) describes key learning from experience from Glasgow and other European cities, identifies design and delivery principles, key design outlines, and provides a proposed way forward for delivery.

At the Neighbourhood-level the network will be more informal and with a focus on walking and wheeling through traffic-reduced streets. This network will largely be identified in collaboration with local communities through the LNP process; while this process creates the bridge between the front door and the City segregated network, the LN approach also recognises that the needs of different age groups, genders and physical abilities is crucial in designing suitable streets and infrastructure.

- **Unlocking Change: enabling everyone to walk, wheel and cycle**

Sub-themes: Training and Education; Collaboration and Engagement

Focussing primarily on behaviour change activity to provide people with the information, skills and confidence to choose active travel. In order to unlock these new active travel journeys we will engage with people across Glasgow, working in collaboration with community and other organisations to identify and reach out to marginalised, under-represented and harder-to-reach groups in order to develop and deliver meaningful programmes of activities to increase active travel among these groups.

A key output will be the Glasgow Sustainable Travel Behaviour Change Strategy.

- **Thinking Differently: encouraging, motivating and sustaining change**

Sub-themes: Promotion and Messaging; Activities, Events and Legacy

Promoting active travel as a viable option to Glasgow's diverse communities through targeted information campaigns, also inspiring and sustaining active travel journeys through developing a series of larger scale, safe-streets community events, and building on the legacy from major international sporting events through the development of grassroots activity.

A key output will be a Sport and Recreational Cycling Strategy.

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d) Name of officer completing assessment (signed and date)

Jan Boyd, [July 2021 and] March 2022

e) Assessment Verified by (signed and date)



24/03/22 - Derek Dunsire, NRS Group Manager Liveable Neighbourhoods

2. GATHERING EVIDENCE & STAKEHOLDER ENGAGEMENT

The best approach to find out if a policy, etc. is likely to impact positively or negatively on equality groups is to look at existing research, previous consultation recommendations, studies or consult with representatives of those groups. You should list below any data, consultations (previous relevant or future planned), or any relevant research or analysis that supports the Policy, Project, Service Reform or Budget Option being undertaken.

<p>Please name any research, data, consultation or studies referred to for this assessment:</p>	<p>Please state if this reference refers to one or more of the protected characteristics:</p> <ul style="list-style-type: none"> ➤ age ➤ disability, ➤ race and/or ethnicity, ➤ religion or belief (including lack of belief), ➤ gender, ➤ gender reassignment, ➤ sexual orientation ➤ marriage and civil partnership, ➤ pregnancy and maternity, 	<p>Do you intend to set up your own consultation? If so, please list the main issues that you wish to address if the consultation is planned; or if consultation has been completed, please note the outcome(s) of consultation.</p>
<p>Discussions with internal and external colleagues were held to identify their current work programmes, key priorities and opportunities for active travel. (Summer/Autumn 2021)</p> <p>Internally, conversations took place with colleagues from across NRS, Education and Glasgow Life.</p>	<p>All are considered here.</p> <p>However, discussions tended to centre around those with the following protected characteristics in particular as being generally under-represented in active travel, and that the ATS would need to seek to address their barriers:</p>	<p>Conversations helped inform the draft Active Travel Strategy and related draft action points, as well as helping to shape the City Network proposals.</p>

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<p>External conversations were with national-level transport-related organisations as well as a wide range of local organisations, including from the third sector and members of GCC's Active Travel Forum.</p> <p>Discussions helped pinpoint groups traditionally under-represented within Active Travel and detailed projects already underway within Glasgow to try and address this inequity.</p>	<p>Age Disability Race and/or ethnicity Gender Pregnancy and maternity</p>	
<p>Draft Active Travel Strategy and City Network subject to public consultation for eight weeks from 12th October to 5th December 2021 (also coinciding with consultation on the policy framework for the Glasgow Transport Strategy).</p> <p>Other online and in-person engagement events / workshops also took place including with elected members and community councils.</p> <p>The consultation activities took on these different formats (in-person and virtual) in order to reach different audiences and</p>	<p>All</p>	<p>The survey hosted on GCC's Consultation Hub was completed by 1183 respondents, eliciting a total of 1703 comments from four open questions which were largely related to the draft strategy's three themes</p> <p>The City Network proposals were hosted on a Commonplace map, to which comments could be added. The site also included a survey. This site drew 1508 visitors in total, 300 of whom were respondents making 582 comments and 2625 contributions.</p> <p>A full consultation report is available here.</p> <p>Topics repeatedly commented upon in the survey open questions / mapping comments were:</p> <ul style="list-style-type: none"> • Cycling infrastructure required that makes cycling feel safe for all, but particularly women, children, older people, disabled people. • Cycling infrastructure (including parking) that considers non-standard cycles e.g. adapted cycles /trikes that many older or disabled people, or people with sensory impairments, may use.

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<p>to be inclusive while Covid-19 restrictions remained.</p> <p>Printed copies of the Active Travel Strategy consultation draft were made available in all the city's libraries.</p> <p>Consultation documents were accessibility checked prior to being posted on-line with alternative versions (e.g. large print or Braille) offered on request. A 'Word' version of the Survey was also made available.</p> <p>Following the consultation, the feedback was collated and analysed and the Strategy updated accordingly and passed to the City's Environment, Sustainability and Carbon Reduction Committee for adoption.</p> <p>Further consultation will take place as the City Network is rolled out across the city over the next 10 years.</p>		<ul style="list-style-type: none"> • Safe routes to schools for children – to tie in with Bikeability and other road safety or cycling training for children, and with GCC's School Streets programme. • Consideration of blind/visually impaired and disabled people in city and neighbourhood network designs, particularly clutter-free footways / points of intersection with cycle lanes and / or public transport. • As the city network rolls out, access to be retained to disabled parking spaces and / or other facilities such as public toilets, pick-up/drop-off points. • Seating, resting and play areas to be incorporated. • Enhanced / increased numbers of road crossings. • Cycles segregated from footways and road carriageways.
<p>As part of the consultation, two virtual meetings / discussions sessions held with Glasgow Disability Alliance members – approximately 20 members present per session.</p>	<p>Disability</p>	<p>Considerations for the city and neighbourhood networks around:</p> <ul style="list-style-type: none"> • Clutter free pavements / provide seating and resting opportunities • Levels of pavement / cycle lanes / carriageway – relevant to each other

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		<ul style="list-style-type: none"> • Materials choices (e.g. wooden handrails) / colours of materials on the ground • Retain parking, access to public toilets • Integration with public transport • Accessing cycle tracks with wide mobility vehicles, adapted cycles, etc. • Availability of training to use adapted cycles – and availability of adapted cycles to use /store • Retaining access for disabled people where streets are closed to motor vehicles, and ensuring easy and safe access to buses for all. (see Consultation report)
<p>A significant amount of desk research, reviewing background research papers, best practice examples, walking & cycling strategies from other cities around the UK, and leading technical guidance documents have helped to inform the ATS and the policies within it. e.g. Cycling by Design, 2021</p> <p>Additionally, the key policy documents considered are also listed within the ATS Policy Context section.</p>	<p>All</p>	
<p>Glasgow Transport Strategy's Case for Change Report</p>	<p>All</p>	<p>This is a technical report of evidence of problems to tackle and opportunities to build on in the new Glasgow Transport Strategy, with relevance also to Active Travel. There have been several iterations of the report, notably following the Public Conversation (see below) and with the most recent version issued June 2021.</p>

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		<p>Findings for Active Travel:</p> <ul style="list-style-type: none"> - Glasgow slightly lags behind other large urban areas in Scotland in terms of the proportion of people who walk for journeys or leisure, though walking remains an important mode overall. People in deprived areas are less likely to participate in walking. - In Glasgow (above Scottish average) in 2018, 73% of households had no private access to a cycle, with those on lower incomes least likely to have access to a cycle. - 46% of all households in Glasgow do not have access to a car – this figure rising to 71% for those households in social sector tenure. - Ownership or access to a cycle was at 23% for men and 16% for women. - Uptake of walking and cycling was related to infrastructure conditions and personal safety and security concerns. - Respondents in the North East of Glasgow were more likely than those elsewhere to perceive a need for more or better off-road cycle lanes (14%, compared to 11% in the North West and 7% in the South). - Active journeys to schools have decreased over the 10 years from 2008 to 2019, particularly for walking, with more children now being driven to school. - Approximately 50% of journeys in Glasgow are less than 3km, suggesting potential for modal shift to active travel.
<p>Connecting Communities Public Conversation on Glasgow’s Transport Future was held for six weeks during September-October 2020. The consultation report can be found here.</p>	<p>All</p>	<p>One of the main findings of the consultation was that over 50% of respondents disagreed that Glasgow’s transport system was adequate for their needs and there was a desire for change.</p> <p>There was a desire to see better pedestrian and cycling infrastructure in Glasgow and development of the new Active Travel Strategy responds to that, also ensuring interventions are inclusive to the needs of people with different or additional travel needs such as those with disabilities.</p> <p>Active Travel findings: Many people wanted to walk and cycle more. People were keen to cycle more for leisure and to access employment and services. However, they need to feel more protected and comfortable on the roads to have the confidence to do so. Affordability also stopped many people from doing more journeys by cycle. People were keen to access local shops and</p>

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		<p>facilities by walking more but needed safer, better maintained pathways to do so.</p> <p>Other findings relevant to the ATS:</p> <ul style="list-style-type: none"> - Nearly 60% said they would consider leaving their car at home for shorter journeys and choose walking or cycling instead. - While a lack of safe places to cycle was noted, there was support for segregated cycle ways and better access to bikes and cycling support. - People feel it was not safe for children to walk, scoot or, in particular to cycle to school. - Lack of adequate walking and cycling infrastructure locally; poor quality public realm. - Noted car-dominated spaces and the current environment makes it too easy to use a car; people walking and cycling competing for the same restricted space as cars, and mobility limited by parked vehicles. - Lack of pedestrian priority; inadequate walking environments which limit mobility and access to local services and contributes to feelings of neglect and poor mental health. - Better environments for walking and behaviour change campaigns were seen as part of the solutions to Glasgow's transport issues. - The majority of people see walking and cycling projects as good for the City.
<p>Spaces for People Commonplace mapping - Glasgow (July 2020). Site now closed but comments can still be read)</p>	<p>All</p>	<p>This Commonplace mapping site was set up by Glasgow City Council and Sustrans Scotland during 2020 at the height of the Covid-19 pandemic, to identify locations across the city that could be improved for walking, wheeling or cycling. Although this focused on protecting public health, there are insights relevant to active travel more generally.</p>
<p>Scottish Index of Multiple Deprivation (2020 published Jan 2020)</p>	<p>All</p>	<p>Detailed dataset showing spatial variation of deprivation across the city, and can help to identify particular areas to focus on as priority in the roll out of the City Network, and also for engagement on specific issues through Liveable Neighbourhoods. This dataset is also being used in ongoing analysis to support the Glasgow Transport Strategy e.g. in relation to public transport accessibility analysis.</p>

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Glasgow Household Survey 2021	All	<p>Post-pandemic, respondents view roads and pavements as one of the most important council services going forward. This combined with 47% stating post-pandemic they would get around more by walking.</p>
Glasgow Household Survey, 2018	All	<p>In 2018, nearly one in ten (9%) respondents said they had had been unable to apply for, or accept, a job whilst living in Glasgow because it would have been difficult to get to or from the place the job was based (note this is most commonly related to public transport).</p>
Glasgow Household Survey, 2019	Age, deprivation	<p>Main issues 2019 report:</p> <ul style="list-style-type: none"> - Residents of the North West were more likely to be satisfied with their neighbourhood than those in the North East and South. - Older respondents (aged 65+) were more likely than average to be satisfied with their neighbourhoods. There was further variation by social grade and deprivation: ABC1s were more satisfied than C2DEs while those in the least deprived areas were more satisfied than those in the most deprived areas. - In terms of top transport improvements people would like to see in their neighbourhood, better road maintenance was top followed by better pavement maintenance, then more/better public transport.
Glasgow Bike Life Report, 2018 and Bike Life All Cities – Women: reducing the gender gap report, 2018	Age, gender, race/ethnicity	<p>Main issues:</p> <ul style="list-style-type: none"> - In Glasgow, black and minority ethnic communities, women and people 55 and over are under-represented when it comes to riding a bike. - Data from the Bike Life survey sample shows 68% of people cycling in Glasgow were men and 92% white. - 50% of “bike riders” were under 34 years of age. - 32% of “bike riders” were women compared to 68% men <p>Research for the report conducted in Glasgow found:</p> <ul style="list-style-type: none"> - Women and men make different types of journeys with women’s typically shorter than men’s, are multi-modal and involve journey chaining. - Women are motivated to travel by bicycle but barriers such as safety concerns and lack of time get in the way. - Women’s views and needs may be omitted from transport planning.

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<p>“Are we nearly there yet?” Exploring gender and active travel (Sustrans, Feb 2018)</p>	<p>Gender (women)</p>	<p>The paper asks that in designing cities, the focus must shift from expecting women to change their behaviour to ensuring a gender analysis in policy, planning and practice that considers the evidence and experiences of women is embedded by practitioners. The paper was informed by a literature review combined with mixed-methods research. The findings/ issues reflect those noted above around differences in journey patterns between men / women with women undertaking more complex journeys with added time pressures and concerns of personal safety and street harassment. More men (16%) in Glasgow cycled than women (5%) in the same month during the research, though walking levels were similar (80% men, 84% women), as were other transport modes (though more men drove than women - 38% compared to 29%).</p>
<p>Inclusive Cycling in Cities and Towns Stage 1 Report, June 2019 (Sustrans, Arup)</p>	<p>Age (older people 65+) Disability Gender (women)</p>	<p>The report on inclusive cycling focussed primarily – but not exclusively - on older people, disabled people and women, noting the deep-rooted barriers to their experience of and interaction with transport systems and travel, with the result that this could limit individual travel choices. The report’s research suggests that many people from these groups would like to start cycling, or cycle more, therefore a focus within cities on breaking down the barriers would start to satisfy the potential appetite.</p> <p>The report also notes that people from BAME communities and those from lower socio-economic backgrounds also cycle less, and the next report will include people from these groups in the research. Though Glasgow is included in the research, which is based on 2017 Bike Life report data, the results reflect national trends.</p> <p>Main issues: <i>Women:</i> men are twice as likely to cycle as women and almost 75% women never cycle, but 32% of those who don’t cycle would like to. Many women cite personal safety worries as a reason not to cycle. <i>Older people:</i> older people cycle less than any other adult age group and there is less interest in this group to start cycling, yet with the right environment, as proved across Europe and in Japan, participation can be high. <i>Disabled people:</i> are less likely to have access to a car and an estimated 84% of disabled people living in the UK’s largest cities never cycle for local</p>

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		<p>journeys while a third of those who don't cycle would like to. 66% of disabled people agreed that their city would be a better place to live if more people cycled.</p> <p>Main barrier groupings were noted as: 1. lack of confidence or desire to cycle; 2. lack of access to/ knowledge of suitable cycle and supporting programmes; 3. if cycling, only doing so locally for leisure due to fear of the roads; 4. lack of infrastructure (for all types of cycles) to support cycling for everyday journeys.</p> <p>Solutions to making cycling in urban areas more accessible and attractive to all: a) Better governance to include women, disabled people and older people in political processes, policy development and transport planning and decision making. b) Improve places to ensure towns/cities are designed for accessible, safe and inclusive cycling, including dedicated space for cycling. c) Supporting people to cycle through access to suitable cycles, training and promotion.</p>
<p>Transport and poverty in Scotland: report of the Poverty and Inequality commission 2019 -</p>	<p>Gender (women) Disability (and with relevancy for socio-economic criteria)</p>	<p>Main issues:</p> <ul style="list-style-type: none"> - A good transport system should be inclusive, taking into account the needs of everyone in society, and be an active tool to prevent and reduce poverty. - Transport matters in relation to poverty because of its potential impact on income, household expenditure and mitigating the impact of poverty. - People in lower income households are more likely to take the bus, while people in higher income households are more likely to drive or take the train. The modes of transport that people use are influenced by their income. - Women and disabled people are particularly likely to experience poverty. - Women and disabled people are less likely to drive but more likely to use buses. - Transport systems have not been designed around these users but to be inclusive need to consider in particular the different needs of women and disabled people, in relation to caring responsibilities, access to

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		<p>health services and participation in public life. For example, transport networks are often based on a 'spoke and hub' model prioritising journeys to city centre, with fewer services for the more local trips which women more often make.</p> <ul style="list-style-type: none"> - Women's journeys are often not point-to-point but journey-chaining due to care responsibilities, work and domestic chores, and more likely to be with children, buggies and shopping bags – which under the current transport infrastructure favours car use. - Having a driving licence, and having access to a car, is strongly related to income. <p>Research also found a relationship between living in areas with higher levels of deprivation and having poorer transport options. While this is not universally the case, research suggests that areas with higher levels of deprivation tend to have worse public transport links in terms of both the number of options and quality of services.</p>
<p>Going Further: Scotland's Accessible Travel Framework (2016)</p> <p>Scotland's Accessible Travel Framework Delivery Plan for 2019-2020</p>	<p>Disability</p>	<p>The Framework seeks four outcomes to support the vision that “all disabled people can travel with the same freedom, choice, dignity and opportunity as other citizens:”:</p> <p>Outcome 1: more disabled people make successful door-to-door journeys, more often;</p> <p>Outcome 2: disabled people are more involved in the design, development and improvement of transport policies, services and infrastructure;</p> <p>Outcome 3: everyone involved in delivering transport information, services and infrastructure will help to enable disabled people to travel.</p> <p>Outcome 4: disabled people will feel comfortable and safe using public transport.</p> <p>Main issues:</p> <ul style="list-style-type: none"> - The last census showed that almost 1 in 5 people in Scotland had a long-term health problem or disability. - In 2014, people in Scotland with a limiting health condition are less likely to have walked or cycled in the previous week than non-disabled people.

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		<ul style="list-style-type: none"> - In 2013-14, 83.1% of disabled people surveyed said they hadn't used a rail service in the last month, compared to 70.7% of the Scottish population not using a rail service in the last month. - In 2013-14, 54.5% of disabled people surveyed said they hadn't used bus services in the last month, compared to 56.6% of the Scottish population not using such services in the last month. - In 2014, people in Scotland with a limiting health condition are less likely to have walked or cycled in the previous week than non-disabled people. For example, people with a limiting health condition were 19.7% less likely to have walked for transport at any time in the previous week. - Disabled people take less time on their commute than non-disabled people, suggesting they do not travel as far for work as non-disabled people. - In 2014, approximately one in 10 disabled people in the UK had difficulties getting to a rail, bus or coach station or stop and a similar proportion had difficulties getting on or off these forms of transport. Nine per cent had difficulties crossing roads or using pavements. - In 2014 an estimated 48% of all adults visited the outdoors one or more times per week for leisure or recreation compared to only 36% of adults with a long-term health condition or illness. - After a lack of job opportunities, difficulty with transport was the most commonly cited barrier to work among UK adults with impairments.
Evaluating delivery of cycling activity and training programmes for disabled people in the UK	Disability	<p>Main issues:</p> <ul style="list-style-type: none"> - TFL research revealed 76% of disabled people can cycle, only 15% use a bike to get around regularly or occasionally. - Yet cycling can form part of a healthy lifestyle and open up door-to-door transport opportunities for everyone including disabled people
Census 2011	All to an extent, though now a fairly dated source and SHS a better source for many indicators	<p>Main issues (where not already covered by more up to date sources):</p> <ul style="list-style-type: none"> - Households from Chinese or African households are more likely to not have access to a car in Glasgow compared to other ethnic groups.

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<p>National Records Scotland</p>	<p>Older people, children & young people</p>	<p>Main issues:</p> <ul style="list-style-type: none"> - Glasgow has a relatively young population, and the youngest of the four largest city-based local authorities in Scotland. - Glasgow has the lowest % population at pensionable age of all local authorities in Scotland. - Whilst the older population segment will increase in the future, Glasgow has the lowest % projected growth in over 75s between 2016 and 2026 in Scotland. - Together with Edinburgh, Glasgow has the highest % population at working age, at 70%.
<p>Scottish Household Survey 2019 data, and Key Findings report (using figures for Glasgow City unless stated otherwise)</p>	<p>Age, Gender, Ethnicity (and links to Socio-economic status)</p>	<p>Main issues:</p> <ul style="list-style-type: none"> - Walking is the most common physical activity with participation by men at 65% (from 48% in 2007) and women 60% (from 51% in 2007). - Significant difference in walking and cycling participation levels between the most deprived (55% walking, 8% cycling) and least deprived areas (81% walking, 19% cycling). - Cycling or walking to work rose from 16% in 2007/8 to 19% in 2019. To higher/further education (Scotland) the rate increased to 40% in 2019 from 26% in 2007. - Walking or cycling to school increased to 55% of school children in 2019 as compared 49% in 2007/8 - Women are more likely than men to have a very strong feeling of belonging with their community at 29%. They also experience more harassment and discrimination than men. For white ethnic groups 29% have a very strong feeling of community belonging, while for minority ethnic groups this is 18%. - (Scotland) for those who perceived their neighbourhood as very/fairly good, 85% felt very or fairly safe walking alone after dark; for those who perceived their neighbourhood as very poor, 61% felt very or a bit unsafe walking along after dark. - 55% of adults live within 5 minutes walking distance of a useable green or blue space, down from 59% in 2013; although those within a 6-10 minute walk rose from 22% in 2013 to 26% in 2019.

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National LGBT Report (2018, Government Equalities Office)	Gender assignment	In the UK in 2018, one of the most common places where cisgender respondents had avoided being open about their sexual orientation was on public transport (65%).
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3. ASSESSMENT & DIFFERENTIAL IMPACTS

Use the table below to provide some **narrative** where you think the **Policy, Project, Service Reform or Budget Option** has either a positive impact (contributes to promoting equality or improving relations within an equality group) or a negative impact (could disadvantage them) and note the reason for the change in policy or the reason for policy development, based on the evidence you have collated.

Protected Characteristic	Specific Characteristics	Positive Impact (it could benefit an equality group)	Negative Impact – (it could disadvantage an equality group)	Socio Economic / Human Rights Impacts
SEX / GENDER	Women	<p>Positive impact. The ATS will create the changes to our street environments to enable everyone to travel actively for more of their everyday journeys, and helping to eliminate many of the differentials in active travel participation rates that currently exist between different groups of people.</p> <p>As a dense, functional network of protected cycle routes, the City Network will remove traffic danger as a reason not to cycle and encourage more representative demographic participation, e.g. 50% women, thus helping women (and others currently underrepresented in cycling) access local services and facilities by active travel.</p>	<p>No impact identified at this time. Glasgow has a higher proportion of single parent households compared to Scotland as a whole, with a disproportionate burden on women.</p> <p>Families have additional space needs in relation to storage of cycles and other cycling equipment at home; and when travelling with children and/or buggies along pavements, and on public transport.</p> <p>For women, journey patterns can be more complex, incorporating journey-chaining from home to places of care, nursery /school, work and shopping. Such journeys may still prove a barrier to women travelling actively, though access to cargo-cycles and better cycle storage, and</p>	<p>The proposals support the promotion of active travel uptake and – through working with the LNP - social, economic, cultural and environmental regeneration of local neighbourhoods by promoting low cost, efficient and effective carbon neutral transport within Glasgow.</p> <p>The introduction of interventions such as improved public space and segregated cycle routes will encourage a greater number of people to walk, wheel and cycle.</p> <p>Separating cyclists from vehicular traffic and implementing Neighbourhood networks with lower traffic volumes and lower speeds, will also reduce the risk of accidents and improve air quality.</p> <p>The negative impact can be reduced through local collaboration: the City Network will be consulted on as its roll-out progresses, and behaviour change programmes will seek the input from local communities and</p>

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		<p>Working with the LNP, the aim is to create more vibrant, liveable places which put people ahead of vehicles, to be achieved through interventions proposed by the local community, and which prioritise a rebalancing of streets and spaces to walking, wheeling and cycling.</p> <p>The improvement in public realm, streets and footways will have a positive impact on people's ability to use these spaces safely and with confidence. The City Network will be well lit and routed through busier areas so that people feel safer using it, including at night.</p>	<p>further roll-out of School Streets, may help mitigate this.</p> <p>Personal safety concerns may persist where active travel routes and / or links with public transport remain quiet/ less busy. Audits / monitoring will help identify issues on the network and seek to eliminate these. The City Network will avoid routing where there are low levels of passive surveillance.</p>	<p>groups of people traditionally under-represented in active travel. (The LNP is formulated around community input to interventions.)</p> <p>Active travel is often viewed as a cheaper (or free) alternative to public transport or driving a car. Although barriers to accessing cycles remain for many, the ATS is supportive of projects which help people to overcome these, including projects that enable affordable or free access to the city's bike share scheme (currently Nextbike).</p> <p>Women are less likely to cycle (Sustrans Bike Life Report 2018), less likely to have a driver's licence (64% of women in 2018 v 76% men, SHS), and more often use buses than men (Scot Govt Equality Evidence finder). Therefore the proposals within the ATS to improve access to bikes and provide training and other support for walking and cycling, will increase transport options for women, while improving links to public transport will support multi-modal journeys.</p>
	Men	<p>Positive impact. The ATS will facilitate more men to access services and employment opportunities via active travel, possibly reaching out to those who have</p>	<p>No impact identified at this time.</p>	<p>As above. In addition, the Scot Govt Equality Evidence finder notes that:</p> <ul style="list-style-type: none"> - men are more likely to walk and cycle for transport compared to women.

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		<p>never considered it before, and create a more positive and safer experience for those who already participate in active travel.</p> <p>Protected cycle routes and improved walking conditions, including reduced traffic levels will create a safer environment for active travel with reduced accident rates. There are numerous proposals in the strategy that aim to make walking and cycling safer for all.</p>		<ul style="list-style-type: none"> - men are also more likely to cycle to work than women (who are more likely to walk). - men drive more frequently, and - men are more likely to be involved in road accidents.
	Transgender	As above	There is limited evidence of differential impacts though could be some issues around personal safety as per Women or LGBT community.	As above
RACE*	White	<p>Positive impact. The ATS will improve conditions for walking, wheeling and cycling for all through a series of infrastructure changes and provision of additional support through education and training, information and communications.</p> <p>Scot Govt Equality Evidence finder</p>	No impact identified at this time.	Improved pedestrian, wheeling and cycle accessibility is advantageous to all groups, and especially where they are less likely to hold a driving licence or have access to a car, or live in areas where public transport options are limited.

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		<ul style="list-style-type: none"> - White Scottish people least likely to walk or cycle for transport. - Ethnic groups most likely to have access to a car or van at the time of the 2011 Census were White: Other British [and Pakistani]. 		
<p><i>Further information on the breakdown below each of these headings, as per census, is available here.</i></p> <p><i>For example Asian includes Chinese, Pakistani and Indian etc.</i></p>	Mixed or Multiple Ethnic Groups	<p>As above.</p> <p>Scot Govt Equality Evidence finder</p> <p>Less likely to have access to a car than average.</p>	No impact identified at this time.	As above
	Asian	<p>As above.</p> <p>Scot Govt Equality Evidence finder</p> <ul style="list-style-type: none"> - Ethnic groups most likely to have access to a car or van at the time of the 2011 Census were White: Other British and Pakistani. - Pakistani households were the most likely to have access to three or more cars or vans. - Asian people least likely to drive. <p>SHS data suggests some Asian groups in Glasgow are more likely to have access to a car whilst Asian-Chinese are less likely to.</p>	No impact identified at this time.	As above

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		Glasgow has a significantly higher proportion of households from Asian ethnic groups than Scotland, and African households.		
	African	As above. Scot Govt Equality Evidence finder - African people least likely to have access to a car (Scotland). African populations in Glasgow are less likely to have access to a car (from Census 2011 data).	No impact identified at this time.	As above
	Caribbean or Black	As above. Scot Govt Equality Evidence finder - Less likely to have access to a car than average.	No impact identified at this time.	As above
	Other Ethnic Group	As above. Scot Govt Equality Evidence finder - White Polish (82%), and Other White (not Scottish, British or Polish) (83%) people had walked most frequently as a means of transport in the previous week. - Least likely to walk were White Scottish people (67%). - Other White people were most likely to have cycled	No impact identified at this time.	As above

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		<p>(12%), compared to just 5% for White Scottish and Asian, Asian Scottish or Asian British people.</p> <ul style="list-style-type: none"> - White Scottish and White other British people least likely to use the bus. - People from other ethnic groups (not White or Asian) are most likely to have taken a bus. - 18% of White Polish people have taken a train in the past month, the lowest for any ethnic group. People from other ethnic groups (not White or Asian) are most likely to have taken a train (38%). 		
DISABILITY	Physical disability	<p>Positive impact. Scotland's Accessible Framework prioritises clear pathways and improved wayfinding and signage, among others.</p> <p>The ATS proposals have the potential to significantly improve access for disabled people, with the rebalancing of our streets giving less priority to vehicles and more emphasis on creating safe, accessible and inclusive spaces for people, with</p>	<p>The use of kerbs to separate cycle routes from pedestrian areas could pose an issue to people with mobility issues. Provision of dropped kerbs at frequent intervals should however ensure that access for all can be maintained.</p> <p>Noted that while interventions that include vertical elements such as full size kerbs can provide a barrier for those with mobility issues, having no kerb or low level kerb can provide a barrier to visually impaired people (see below).</p>	<p>The ATS recognises that for many disabled people their car is their mobility aid. Disabled Parking bays will be retained although there is the possibility that some will require relocation.</p>

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		<p>appropriate facilities. This includes:</p> <ul style="list-style-type: none"> • cycling infrastructure with the capacity for adapted and / or non-standard cycles which some disabled people may use • improved cycling infrastructure that encourages people on cycles away from using pavements. • clearer footways • dropped kerbs • better and more road crossings • benches and resting areas • retaining accessible parking and drop-off locations included in designs. • Streets designed for 20mph vehicle speed • less traffic <p>These measures also to be supported through promotions and messaging and behaviour change programmes. Within this, support for improving access to cycles, including for non-standard and adapted bikes, and suitable</p>	<p>During the consultation disabled people raised concerns about possible collisions between pedestrians and cycles, which could potentially impact more on disabled people. Advise to use formal crossing points to ensure crossing cycle routes with confidence. GCC to ensure designs contain appropriate numbers of crossing points over cycle ways.</p> <p>We will continue to consult and work with disabled people to ensure infrastructure designs are optimal.</p> <p>The ATS behaviour change strategy will support this through promotional messaging around good behaviour by all road users.</p> <p>Ensure that those who use motor-vehicles as a mobility aid have access protected through the introduction of active travel measures.</p>	
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		<p>training to create the confidence to cycle.</p>		
<p><i>A definition of disability under the Equality Act 2010 is available here.</i></p>	<p>Sensory Impairment (sight, hearing,)</p>	<p>Positive impact. The rebalancing of Glasgow's streets and places giving more emphasis to people over vehicles, resulting in quieter streets with improved crossings, better links to public transport, clearer pavements, will likely have a positive impact on people with sensory impairments.</p>	<p>Concerns were raised during the ATS consultation that within some streetscape interventions the needs of some blind or visually impaired road users differ to those who are physically disabled.</p> <p>In other projects the RNIB and Guide Dogs Scotland have raised concerns over the way segregated cycle routes are separated from pedestrians and advised the use of 60mm kerbs/vertical deflections rather than a simple painted line or surface texture contrast.</p> <p>There may be concerns about collisions between pedestrians and cycles, which could potentially impact more on disabled people. Advise to use formal crossing points to ensure people with visual impairments can cross the cycle routes with confidence.</p> <p>Coloured tactile paving will be used to both alert pedestrians of the cycle route crossing point, and to alert cyclists of the potential for pedestrians to be crossing ahead.</p>	

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			<p>As the City Network progresses, best practice design guidance will be consulted and there will be ongoing dialogue with disabled groups to ensure inclusive and accessible designs, and a continual learning process and updating of our own best practice.</p> <p>The ATS behaviour change strategy will support this through messaging around good behaviour by all road users.</p>	
	<p style="text-align: center;">Mental Health</p>	<p>Positive impact. A rebalancing of our streets and improvement of public spaces through both the ATS and LNP may enhance the sense of community within neighbourhoods and have a positive impact on people's mental health</p> <p>Active travel is recognised as a means for people to increase their physical activity, and thereby makes a significant contribution to mental (and physical) health and wellbeing.</p> <p>In collaboration with delivery partners, the</p>	<p>No impact identified at this time.</p>	

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		behaviour change activities within the ATS will seek to support harder to reach people within our communities to be more active - through programmes / interventions such as 'social prescribing' or 'buddy' walking/cycling.		
	Learning Disability	<p>Positive impact. Less cluttered, more clearly defined spaces with a focus on pedestrians and cyclists instead of vehicles is likely to create a better environment for people with learning disabilities to navigate.</p> <p>In collaboration with delivery partners, the behaviour change interventions / activities within the ATS will seek to support harder to reach people within our communities to be more active, e.g. activities already carried out by Freewheel North.</p>		
LGBT	Lesbians	The improvements to enable active travel, the creation of more liveable places, and putting people rather than vehicles first	No impact identified at this time.	Scot Govt Sexual Orientation in Scotland 2017 (summary evidence base) notes LGBO (those identifying as 'lesbian', 'gay', 'bisexual' or 'other') adults are more likely to be
	Gay Men		As above.	

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	Bisexual	<p>(while still allowing access for vehicles), will have a positive impact on people's ability to use their neighbourhood spaces safely and with confidence.</p> <p>There may be some similar concerns around safety as for Women (above), with some research suggesting safety is an issue for individuals identifying as LGBT, particularly on public transport. The City Network will be well lit and routed through busier areas so that people feel safer using it, including at night.</p>	As above.	younger, to live in large urban areas and deprived areas, be unemployed and report less good health.
AGE	Older People (60 +)	<p>Positive impact. Infrastructure proposals within the ATS (and LNP) will help older people participate actively. For example, smoother clearer pavements and installation of seating; protected cycle routes removing fear of cycling in traffic; enhanced links to green networks and greenspace.</p> <p>Some older people may have reduced mobility or</p>		<p>Scot Govt Equality Evidence finder:</p> <ul style="list-style-type: none"> - Travel decreases with age for people over 60. - Over a third of bus journeys are by concessionary pass holders. Older people are more likely to use the bus than average. - As people get older they are more likely to drive to work (though older people drive less). - Walking and cycling as a means of transport decreases with age.

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		<p>sensory impairments - similar impacts as for Disability above.</p> <p>Supporting measures are contained within the ATS around, e.g. Health Walks, buddy/ mentor programmes, to support people to reconnect with their communities and to be active every day.</p>		
	<p style="text-align: center;">Younger People (16-25)</p>	<p>Positive impact. Enhanced conditions for active travel will increase overall access to work and study opportunities, and provide independence for young people through low-cost travel options.</p> <p>Improved safety, e.g. City Network to be well lit, protected cycle routes to reduce road accidents.</p>		<p>Glasgow has a relatively young population compared to Scotland, and the travel choices of young people are gradually changing, e.g. introduction of free bus travel for 5-21 year olds.</p> <p>Lack of transport can be a barrier to accessing further education, training and jobs</p> <p>Scot Govt Equality Evidence finder</p> <ul style="list-style-type: none"> - Accident rates higher for younger drivers; young people more likely than the population as a whole to be injured on the roads. - Younger people are more likely to use the train and bus than average. They are more likely to walk to work or travel by bus to work. - Younger people drive less frequently and less likely to hold

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				<p>a licence or have access to a car.</p> <p>Glasgow Bike Life, 2018 – 25% of 16-24 year olds cycle.</p>
	Children (0-16)	<p>Positive impact.</p> <p>The ATS has a focus on young people, aiming for every school to be within 400m of the City Network, while neighbourhood networks (through the LNP) will provide the links between the city network and schools.</p> <p>Additional support through GCC's Road Safety Plan and roll out of School Streets, and 20mph.</p> <p>Bikeability training to be increased to 100% of schools and children.</p> <p>These measures provide the opportunity for safe access to local schools, improved health through activity and traffic reduction, and active travel normalised for our next generations.</p> <p>.</p>	<p>Over half of journeys to school in Scotland are by active travel.</p> <p>Glasgow Bike Life 2018 survey sample – only 24% thought safety of children's cycling in the city was 'good' (less than the 32% who thought cycling safety generally in Glasgow was good).</p> <p>Even if school children have access to school transport, the lack of public transport or expensive public transport can limit access to extra-curricular activities.</p>	<p>Support within the ATS for 'grassroots' programmes for children's cycling training, with a focus on areas of deprivation; improving access to cycling activities, including at Venues and through clubs, etc.</p> <p>The ATS aims for every school to be within 400m of the City Network.</p>
MARRIAGE & CIVIL PARTNERSHIP	Women	As above for gender.	As above for gender.	

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	Men	As above for gender.	As above for gender.	
	Lesbians	As above for LGBT.	As above for LGBT.	
	Gay Men	As above for LGBT.	As above for LGBT.	
PREGNANCY & MATERNITY	Women	<p>Positive impact. The ATS (with the LNP) will make improvements to our neighbourhood environments for walking and wheeling (including with prams, etc.).</p> <p>Includes clearer, smoother, footways; better and increased crossing points; dropped kerbs, seating/resting points; better links to public transport; and paths allowing access to daily amenities.</p>	Likely to be similar issues to Women above plus suitable facilities required during journeys (e.g. seats, access to toilets and baby changing and breastfeeding areas).	
RELIGION & BELIEF** A list of religions used in the census is available here .	See note	Positive as above: The ATS will improve conditions for walking, wheeling and cycling for all through a series of infrastructure changes and provision of additional support through education and training, information and communications.		<p>There is a slightly higher (but declining) % of people with religious beliefs in Glasgow v Scotland as a whole, and a higher % of people of the Roman Catholic faith in Glasgow than Scotland as a whole, and from “other religions” category in SHS.</p> <p>In terms of differential impacts from transport specifically, Scot Govt Equality Evidence finder</p>

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				states that Sikhs have highest car access.
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* For reasons of brevity race is not an exhaustive list, and therefore please feel free to augment the list above where appropriate; to reflect the complexity of other racial identities.

** There are too many faith groups to provide a list, therefore, please input the faith group e.g. Muslims, Buddhists, Jews, Christians, Hindus, etc. Consider the different faith groups individually when considering positive or negative impacts. A list of religions used in the census is available [here](#).

Summary of Protected Characteristics Most Impacted

The evidence suggests that for all of the Protected Characteristics groups, the Active Travel Strategy will have a substantial positive impact through the creation of better physical environments in our streets and places for walking, wheeling and cycling, with further support through the 'softer' behaviour change measures such as training and education, improving access to cycles, and promotion and messaging.

The ATS - and in particular the City Network roll out - will work closely alongside the Liveable Neighbourhoods Plan which, through a careful process of co-design with local communities, will seek to rebalance street space towards walking and cycling, and to create more liveable and vibrant places that put people, rather than vehicles, first. Additional benefits will be gained by all through an improved overall city environment and better air quality.

It is recognised, however, that there is potential for some disabled, sensory impaired or older people to be impacted by the proposals, particularly in relation to crossing segregated cycle routes to reach road crossing points or bus stops. There may also be conflicting requirements from physical infrastructure between blind/visually impaired people and disabled people; in addressing this the ongoing design process will be considerate of best practice (from around the country and locally) and a dialogue with the impacted groups will be continued through specific consultation and the Inclusive and Accessible Design Forum.

Summary of Socio Economic Impacts

The proposals support the promotion of active travel uptake and social, economic, cultural and environmental regeneration of local neighbourhoods by promoting better places through community empowerment and choice of low cost, efficient and effective carbon neutral transport within Glasgow.

Summary of Human Rights Impacts

The introduction of the ATS aims to improve public spaces which will encourage a greater number of people to walk and cycle, and to implement interventions that promote lower traffic volumes and lower speeds, thereby also reducing the risk of accidents, and improve the environment (emission and noise).

4. OUTCOMES, ACTION & PUBLIC REPORTING

Screening Outcome	Yes /No Or / Not At This Stage
Was a significant level of negative impact arising from the project, policy or strategy identified?	Not at this stage.
Does the project, policy or strategy require to be amended to have a positive impact?	Not at this stage.
Does a Full Impact Assessment need to be undertaken?	Not at this stage.

Actions: Next Steps

(i.e. is there a strategic group that can monitor any future actions)

Further Action Required/ Action To Be Undertaken	Lead Officer and/or Lead Strategic Group	Timescale for Resolution of Negative Impact (s) / Delivery of Positive Impact (s)
<p>Public consultation completed late autumn 2021. Consultation Report presented to Committee, along with the revised version of the ATS and the Interim Delivery Plan for the City Network, February 2022.</p> <p>The ATS team is working towards creating 'easy read' versions of the final ATS document and City Network delivery plan, and for the additional strategy documents going forward, and will pursue the creation of other alternative formats of these documents, to improve accessibility.</p> <p>Two additional strategies to complement delivery of the ATS are currently in development:</p> <p>1) Sustainable Transport Behaviour Change Strategy – due September 2022. A short-life working group for this strategy will be established during March 2022.</p> <p>2) Sport and Recreational Cycling Strategy – due late in 2022. A short-life working group will be established in spring 2022.</p> <p>Targeted stakeholder consultation / conversations / workshops will be conducted</p>	<p>The Group Manager for Liveable Neighbourhoods and the wider Active Travel Strategy and Liveable Neighbourhoods team, within NRS.</p>	<p>Consultation report, Interim Delivery Plan for the City Network, and final version of Glasgow's Active Travel Strategy 2022-2031 were presented to ESCR Committee on 1st February 2022, with the recommendation to adopt the Strategy.</p> <p>These were additionally presented to and approved by the City Administration Committee on 24th February 2022.</p> <p>City Network roll out will continue to consult with relevant communities to ensure optimal designs and consideration of impacts of those with protected characteristics. This will include, during 2022, the establishment of an Inclusive and Accessible Design Forum (AIDF) to ensure cognisance is taken of the needs of disabled people within infrastructure designs across the city and to ensure investment enhances positive outcomes in social inclusivity and ensures no individual, community or social group is left behind.</p> <p>This should also provide a resource-efficient way for organisations representing disabled people to ensure their views are recorded and considered, with an opportunity for balanced dialogue between stakeholders, supported by independent facilitation.</p> <p>Although the Forum is being led by GCC's Avenues team, the outputs and decisions will be shared across, and used to inform,</p>

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<p>later in 2022 to support development of these two additional Strategies. There will be particular focus on including people with protected characteristics in these activities.</p> <p>Detailed Action Plans relating to the policies and 'action points' listed within the ATS, will be incorporated into these additional strategies. These will include information on delivery partners, timescales and any additional targets, governance and monitoring.</p> <p>The Action Plans development process will identify a high level Governance structure to oversee the monitoring processes which will in turn review the progress and success of implementation of the ATS. This will be in terms of both the rate of infrastructure delivery and its usage, and delivery of behaviour change interventions in communities:</p> <ul style="list-style-type: none"> - The roll out of the City Network will be monitored based on factors such as km delivered, number of protected junctions installed and numbers of schools connected to the network. - Usage of the network will be monitored systemically by continuing the installation of counters on new cycle infrastructure. - Equity of use will be monitored through the ongoing Walking and Cycling Index as well as developing targeted monitoring of specific routes to ensure we understand the demographics of use. - The Behaviour Change strategy will develop a framework usable by community groups for ongoing monitoring of activities they deliver. 		<p>all GCCs active travel infrastructure projects, to help provide consistency across the city.</p> <p>A briefing note to update elected members on progress in establishing the AIDF was issued during March 2022; the first AIDF meeting will be held March 30th 2022. Invitees to the Forum include organisations representing people with sensory impairments and physical disabilities, cycling groups and walking representatives.</p> <p>By 2023, we will have established appropriate governance structures and sustainable funding mechanisms for roll out of the City Network.</p> <p>By 2026, we will have the first local networks in place from which we will build out the network to the whole of Glasgow.</p>
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Public Reporting

All completed EQIA Screenings are required to be publically available on the [Council EQIA Webpage](#) once they have been signed off by the relevant manager, and/or Strategic, Policy, or Operational Group. (See [EQIA Guidance](#): Pgs. 11-12)

5. MONITORING OUTCOMES, EVALUATION & REVIEW

The Equalities Impact Assessment (EQIA) screening is not an end in itself but the start of a continuous monitoring and review process. The relevant Strategic, Policy, or Operational Group responsible for the delivery of the Policy, Project, Service Reform or Budget Option, is also responsible for monitoring and reviewing the EQIA Screening and any actions that may have been take to mitigate impacts.

Individual services are responsible for conducting the impact assessment for their area, staff from **Corporate Strategic Policy and Planning** will be available to provide support and guidance.

Legislation

Equality Act (2010) - the Equality Act 2010 (Specific Duties) Scotland Regulations 2012

The 2010 Act consolidated previous equalities legislation to protect people from discrimination on grounds of:

- race
- sex
- being a transsexual person (transsexuality is where someone has changed, is changing or has proposed changing their sex – called 'gender reassignment' in law)
- sexual orientation (whether being lesbian, gay, bisexual or heterosexual)
- disability (or because of something connected with their disability)
- religion or belief
- having just had a baby or being pregnant
- being married or in a civil partnership, and
- age.

Further information: [Equality Act Guidance](#)

As noted the Equality Act 2010 simplifies the current laws and puts them all together in one piece of legislation. In addition the **Specific Duties (Scotland Regulations 2012)** require local authorities to do the following to enable better performance of the general equality duty:

- report progress on mainstreaming the general equality duty
- publish equality outcomes and report progress in meeting those
- impact assess new or revised policies and practices as well as making arrangements to review existing policies and practices gather, use and publish employee information
- publish gender pay gap information and an equal pay statement
- consider adding equality award criteria and contract conditions in public procurement exercises.

Further information: [Understanding Scottish Specific Public Sector Equality Duties](#)

Fairer Scotland Duty

Authorities should also consider Socio-Economic Impacts where appropriate. Further information: [Fairer Scotland Duty Interim Guidance](#)

Enforcement

Judicial review of an authority can be taken by any person, including the Equality and Human Rights Commission (EHRC) or a group of people, with an interest, in respect of alleged failure to comply with the general equality duty. Only the EHRC can enforce the specific duties. A failure to comply with the specific duties may however be used as evidence of a failure to comply with the general duty.