

Appendix C

Equality Impact Assessment Form

Before completing this form, please refer to [the supporting guidance document](#)

The purpose of this form is to aid the Council in meeting the requirements of the Public Sector Equality Duty contained in the Equality Act 2010. This requires the Council to have “due regard” of the impact of its actions on the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic and those who do not.

The assessment is used to identify and record any concerns and potential risks. The following actions can then be taken to address these issues.

- Remove risks: abandon the proposed policy or practice
- Mitigate risks – amend the proposed policy or practice so that risks are reduced
- Justify policy or practice in terms of other objectives

1- Policy details	
Name of policy	Street Lighting – Proposed Service Changes
Department and service	Environment & Transport Department Structures & Street Lighting
Who has been involved in completing the Equality Impact Assessment?	Pat Clarke DEG members
Contact details	pat.clarke@leics.gov.uk
Date of completion	15/05/23 Updated 30/10/23 and circulated to DEG for comments. No comments received.
2- Objectives and background of policy or practice change Use this section to describe the policy or practice change What is the purpose, expected outcomes and rationale? Include the background information and context	

What is the proposal?

What change and impact is intended by the proposal?

Leicestershire County Council continues to face significant financial challenges with the Council's budget gaps set to rise to nearly £90m by 2026. The Council is also committed to reducing the impact of climate change. Through its Medium-Term Financial Strategy (MTFS), the Council originally identified potential savings of approximately £500,000 with a street lighting proposal which also reduces energy consumption by 1,508,000 kwh and carbon emissions by 315 tonnes a year. Advances in LED lighting and their management systems mean the Council has an opportunity to tweak lighting levels during less busy periods. Currently, all streetlights are lit to various levels across the county, some of which gradually dim through the night.

The proposal is to reduce lighting intensity to 30% from 20:00 hours (currently 22:00 hours). Lighting will remain on but will be slightly dimmer than current levels for the hours between 20:00-22:00, from which time most residential lights are already dimmed to 30%. The changes are proposed to be county-wide and will impact all areas covered by the Council owned and managed street lighting. In parallel to the consultation exercise risk, we have risk assessed a number of locations that we thought might need to be made exempt. In the risk assessment documents these locations have been highlighted and the lights in these places will not be dimmed to 30%.

In order to reduce risk, lighting levels will be retained as follow:

- Places where there are vertical calming measures such as speed bumps;
- At zebra crossings;
- In town centres, extent to be determined by the Council;
- Where steps are currently illuminated;
- Where there are evidenced increases in night- time crime and anti- social behaviour between 20:00-22:00 hours;
- Where there are evidenced increases in nigh-time vehicular accidents between 20:00-22:00 hours (specifically increases in accidents of greater severity at conflict areas such as roundabouts or key junctions);
- Where there are evidenced increases in night-time crime/anti-social behaviour between 20:00-22:00 hours.

	<p>On an on-going basis we will monitor:</p> <ul style="list-style-type: none"> • Any increased interaction between pedestrians and street furniture; • Increased conflict of vehicles outside conflict area; • Increased conflict between vehicles pedestrians and cyclists outside conflict areas. <p>Knowing whether or how individuals will be affected by the proposed changes can depend on a number of factors such as eyesight, health, variations in lighting, spaces between lights, the presence of additional hazards and measures people already take themselves to manage risk when out and about on dark evenings.</p> <p>The initial Equality Impact Assessment (EIA) identified a potential increased risk of slips/trips/falls during hours of darkness for people with certain disabilities, vulnerabilities or pregnancy and that some people with certain protected characteristics may fear an increased risk of crime and anti-social behaviour during the hours of darkness. The consultation has largely confirmed those initial views in the initial EIA and this updated document reflects what people have said and how mitigations might reduce the risk to individuals.</p>
<p>What is the rationale for this proposal?</p>	<p>The Council needs to make significant financial savings over the next four years. This means that difficult decisions are having to be made on what the Council continues to do, and which services it may need to reduce. Following risk assessment work, it is proposed to dim fewer lights than first envisaged. A number of important risk mitigation measures have been put in place following this.</p> <p>It is now estimated that the proposal would save £ 380,000 per annum based on current energy prices taking into account areas that would be exempt from the proposal.</p> <p>The proposal also supports the Council’s commitment to achieving net zero carbon emissions in Leicestershire by 2045. It is estimated that the proposal would save 1.5 million kWh energy and 315 tonnes of CO₂e (revised carbon and energy figs need to go in when available).</p> <p>Whilst residents value street lighting, the Council has the power to light the highway but not a duty to do so.</p>

British Standard (BS) 5489 states that 'Road lighting should provide visual clues and reveal obstacles so that safe vehicular progress is possible. It should reveal all the features of the road and traffic that are important to all road users, including pedestrians.'

The proposal moves away from compliance with current British Standards, so it is deemed a 'Departure from Standards' and will, therefore, require the Cabinet's approval. We cannot make the proposed savings without departing from British Standards.

The fear of crime on winter evenings is recognised by the Council as a concern to citizens. Where people have said that they would change their behaviour if proposed change takes place, this is noted in the document.

Responsibility for managing crime and the fear of crime is, however, the responsibility of the police and officers will work closely with the police if any issues of concern are noticed due to the dimming of the streetlights between 20:00-22:00 hours continue to be a factor.

Although there is no legal requirement to provide street lighting, the Council would still provide lighting at this time albeit at a reduced level, and this should reduce adverse impacts to some extent.

Users of the highway would need to continue to take due care and attention while navigating the network, in line with current individual responsibility.

If the change proposal is approved the Cabinet, an 18-month pilot is to be undertaken continuing to manage any risk that may emerge, working closely with the Leicestershire Constabulary and the other emergency services.

3- Evidence gathered on equality implications - Data and engagement

What evidence about potential equality impacts is already available?

This could come from research, service analysis, questionnaires, and engagement with protected characteristics groups

What equalities information or data has been gathered so far?

The Street Lighting Energy Reduction Project (2009) included an equalities assessment.

There have been further initiatives that build on this in the years since. The most recent was in 2022 and its purpose was to achieve energy and cost savings by reducing the operational hours of circa 29,000 residential Part-Night Lighting (PNL) assets by adjusting the ambient light settings that trigger the switch-on and switch-off times at twilight (sunset and sunrise) from 15 LUX to 5 LUX (5 LUX is slightly darker than 15 LUX). An Equality and Human Rights Impact Assessment (EHRIA) was developed for this project.

It is assumed that the current project's impacts will be similar, so this EIA draws from that experience.

What does it show?

Engagement has now been held on the proposals and specific feedback on how people with protected characteristics may be impacted has been received, which will feed into the final proposals for change. The 2009 EHRIA referred to outcomes from PNL pilots in Essex and Gloucestershire. The most relevant excerpt states:

“Essex County Council has recently finished a Part-Night Lighting pilot involving about 6,000 lights, which have been switched off from midnight to 5.30 am since April 2007. During this period, crime in the area has actually dropped slightly and traffic accidents have not increased. Fear of crime was measured by asking citizens if they felt safe after dark. The percentage of people who felt safe after dark in the pilot areas dropped after the Part-Night Lighting was introduced (it dropped overall in Essex as well). However, it did recover a year after the pilot had been in place to a higher level than its starting point before the pilot started.”

Council Accident Investigation and the Leicestershire Police were consulted one year after PNL implementation in each village/town, with no evidence of an increase in accidents or crime. A further Council crime study was completed in 2015 showing no increase in crime in PNL areas.

What engagement has been undertaken so far?

The savings requirement was set out in the MTFS which was subject to formal consultation prior to approval in February 2023.

An engagement exercise on proposed changes to street-lighting was undertaken with members of the public between 3 July and 6 August 2023.

A presentation was given to the Leicestershire Equalities Challenge Group (LECG) on 21 July and minutes for consideration were received following the presentation.

Of the recipients who responded to the engagement exercise and provided feedback, approximately 45% of those agreed with the proposals and 55% objected to the proposals. The main concerns were fear of crime and general vulnerability. The main reason respondents thought they would be affected by the proposal was concern about lighting levels and concern about personal safety.

What does it show?

Feedback from LECG raised the following points:

- 1) More consideration needs to be given for people with sight loss potential hazards and differ for different vision impairments.
- 2) Issues in rural areas particularly for people with dementia and mental health issues.
- 3) Safety issues for women, elderly and vulnerable people.
- 4) More reassurance to reduce negative perceptions/impacts of increased thefts, hate crime and antisocial behaviours.

These points are considered in the relevant sections of this EIA.

4- Benefits, concerns and mitigating action

Please specify if any individuals or community groups who identify with any of the '[protected characteristics](#)' may *potentially* be affected by the policy and describe any benefits and concerns including any barriers.

Use this section to demonstrate how risks would be mitigated for each affected group

Group	What are the benefits of the proposal for those from the following groups?	Are there any known concerns for these groups?	What are the known concerns and how will they be mitigated?
Age	<p>No direct benefits.</p> <p>Indirect benefits of carbon reduction.</p> <p>Indirect benefits of LCC financial sustainability across its wider services.</p>	Yes	<p><u>Initial EIA assessment</u></p> <p>There is a potentially higher risk of slips trips and falls due to lower lighting levels as well as an increase in road traffic accidents and collisions, where people have visual problems and /or mobility issues that can occur in older people. Individuals may also feel more at risk of crime or antisocial behaviour. For some people this may impact their ability to go out in the evenings causing them to become socially isolated.</p> <p><u>What people have told us about their concerns</u></p> <p>Respondents aged 45-54 represented the highest response rate and disagreed most with the proposals. Fear of crime and general vulnerability were the main reasons for this. Personal safety and lighting levels were cited as the greatest impact of the proposals but only 4% of this group indicated that this would change their behaviour because of this.</p>

			<p>Those aged 65-74 were the most supportive of the proposal citing light pollution and saving money as their reasons for support.</p> <p>LECG also note concerns for elderly people.</p> <p><u>Mitigations</u></p> <p>A risk assessment of those areas where there could be a greater likelihood of harm occurring was carried out and it identified some situations where lights will not be subject to proposed dimming (see part two of the document for further details).</p> <p>Retaining lighting albeit at a reduced level, should also reduce adverse impacts to some extent.</p> <p>Running a safety campaign through the winter to remind people how to stay safe and visible during dark nights in winter.</p> <p>Monitoring any increased reported risk as part of a pilot project and taking action where necessary working closely with the police and emergency services.</p> <p>Crime and antisocial behaviour levels will be monitored and the Council will be working with the police to aid their investigations. Should the police require levels of lighting to be increased temporarily, this can be done via the Central Management System controlling the LED streetlights. Continuing to listen to Leicestershire residents and acting on any complaints or enquires to elected members on increased individual risk.</p> <p>No specific mitigations have been identified on account of age alone but people who have additional mobility, sight or mental health issues have additional challenges in managing risk and this is covered in the section on disability.</p>
Disability	No direct benefits.	Yes	<u>Initial EIA Assessment</u>

	<p>Indirect benefits of carbon reduction.</p> <p>Indirect benefits of LCC financial sustainability across its wider services.</p>	<p>People with disabilities could be adversely impacted depending on the nature of their disability. Some disabilities such as visual impairment or mobility could mean the proposals make things more difficult and potentially increase the risk of slips trips and falls, road traffic accidents and collisions. Individuals may also feel more at risk of crime or antisocial behaviour. For some people this may impact their ability to go out in the evenings causing them to become socially isolated.</p> <p><u>What people have told us about their concerns</u></p> <p>Disabled respondents were concerned about proposed change to the dimming of lights between 20:00-22:00 hours to a slightly increased degree compared with all respondents.</p> <p>The main concerns were general vulnerability and fear of crime.</p> <p>LECG has suggested that people with visual impairments are likely to face additional challenges and suggest that the Council gives more consideration to this, such as putting light reflective strips on each lamppost. LECG also advised that the Council gives more consideration to people with dementia and mental health issues, but no specific suggestions were made.</p> <p><u>Mitigations</u></p> <p>A risk assessment of those areas where there could be a greater likelihood of harm occurring was conducted and it identified some situations where lights will not be subject to proposed dimming (see part two of the document for further details).</p> <p>Retaining lighting albeit at a reduced level, should also reduce adverse impacts to some extent.</p>
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		<p>Running a safety campaign through the winter to remind people how to stay safe and visible during dark nights in winter.</p> <p>Monitoring any increased reported risk as part of a pilot project and taking action where necessary working closely with the police and emergency services.</p> <p>Crime and antisocial behaviour levels will be monitored and the Council will be working with the police to aid their investigations. Should the police require levels of lighting to be increased temporarily, this can be done via the Central Management system controlling the LED street lights.</p> <p>Continuing to listen to the residents and acting on any complaints or enquires to elected members on increased individual risks.</p> <p><u>Additional Mitigations Considered</u></p> <p>The Council has considered whether it could put visible strips on streetlights to help people with visual impairments. There are approximately 69,600 streetlights in the county and unfortunately the cost of this would be prohibitive overall.</p> <p>It is acknowledged that some people with visual impairments do face additional challenges in taking due care and attention when using the highway and may already have measures in place to reduce risk when out and about, particularly in the evening.</p> <p>However, the Council proposes to maintain an ongoing dialogue with Vista, to consider risks affecting specific individuals with visual impairments. Mitigations could include putting reflective strips on potential hazards in locations that cause individuals particular difficulty.</p>
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			<p>LECG also asked that greater consideration is given to those experiencing dementia or mental health.</p> <p>It is accepted that some types of dementia and metal health illnesses can cause confusion and disorientation, posing some individuals at greater risk day and night.</p> <p>It is not, therefore, considered possible to mitigate this risk in a general sense, however, should this be raised, an individual risk on a case by case basis will be examined.</p> <p>It is anticipated that individuals open to Adult Social Care Services and to NHS mental health services will also have appropriate risk assessments in place as part of care planning.</p>
Race	<p>No direct benefits.</p> <p>Indirect benefits of carbon reduction.</p> <p>Indirect benefits of LCC financial sustainability across its wider services.</p>	Yes	<p><u>Initial EIA assessment</u></p> <p>Some people may feel more at risk of racially motivated crime or antisocial behaviour impacting on their choices about evening activities and potentially increasing social isolation for some.</p> <p><u>What people have told us about their concerns</u></p> <p>Whilst most respondents were White British, those from Asian or Asian British, Black or Black British or mixed groups backgrounds raised concerns about proposed change due to fear of crime and general vulnerability.</p> <p><u>Mitigations</u></p> <p>A risk assessment of those areas where there could be a greater likelihood of harm occurring was conducted and it identified some situations where lights will not be subject to proposed dimming (see part two of the document for further</p>

			<p>details). Providing lighting albeit at a reduced level, should also reduce adverse impacts to some extent.</p> <p>Monitoring any increased reported risk as part of a pilot project and taking action where necessary working closely with the police and emergency services.</p> <p>Crime and antisocial behaviour levels will be monitored with the police and emergency services and lighting levels can be amended temporarily via the Central Management System if required.</p> <p>Continuing to listen to residents and acting on any complaints or enquires to elected members on increased individual risk.</p>
Sex	<p>No direct benefits.</p> <p>Indirect benefits of carbon reduction.</p> <p>Indirect benefits of LCC financial sustainability across its wider services.</p>	Yes	<p><u>Initial EIA Assessment.</u></p> <p>Crimes against women have increased each year since 2019. Therefore, women may face real or perceived risks as a result of the proposed change. This could impact on their choices about evening activities, resulting in increased isolation for some.</p> <p><u>What people have told us about their concerns</u></p> <p>More females responded to the engagement exercise than any other groups combined. Women and those who preferred not to state their gender felt strongly that there would be an impact (77% and 70%) compared to 62% of men.</p> <p>19% of women felt that they would be impacted by personal safety with 9% saying that they would change their behaviour due to the proposals.</p> <p>The LECG also felt that women would be impacted by the proposals.</p> <p><u>Mitigations</u></p>

			<p>A risk assessment of those areas where there could be a greater likelihood of harm occurring was conducted and it identified some situations where lights will not be subject to proposed dimming (see part two of the document for further details).</p> <p>Retaining lighting albeit at a reduced level, should also reduce adverse impacts to some extent.</p> <p>Monitoring any increased reported risk as part of a pilot project and taking action where necessary working closely with the police and emergency services.</p> <p>Crime and antisocial behaviour levels will be monitored with the police and emergency services and lighting levels can be amended temporarily via the Central Management System if required.</p> <p>Continuing to listen to the residents and acting on any complaints or enquires to elected members on increased individual risk.</p>
<p>Gender Reassignment</p>	<p>No direct benefits. Indirect benefits of carbon reduction. Indirect benefits of LCC financial sustainability across its wider services.</p>	<p>Yes</p>	<p><u>Initial EIA Assessment</u></p> <p>Some people at any stage of gender reassignment may have a perception of being more at risk of crime or anti-social behaviour. This could impact on their choices about evening activities, which may man and increase in social isolation for some.</p> <p><u>What people have told us about their concerns.</u></p> <p>A small number of people with this protected characteristic responded to the survey. None of the respondents indicated they would change their behaviour as a result of the proposals. However, the Council remains mindful of the prejudice and hate crime that this group can experience in developing mitigations. Had</p>

			<p>more people with this protected characteristic responded, it is possible that findings would be similar to those with other protected characteristics.</p> <p><u>Mitigations</u></p> <p>A risk assessment of those areas where there could be a greater likelihood of harm occurring was conducted and it identified some situations where lights will not be subject to proposed dimming (see part two of the document for further details).</p> <p>Retaining lighting albeit at a reduced level, should also reduce adverse impacts to some extent.</p> <p>Crime and antisocial behaviour levels will be monitored with the police and emergency services and lighting levels can be amended temporarily via the Central Management System if required.</p> <p>Continuing to listen to the residents and acting on any complaints or enquires to elected members on increased individual risk.</p>
Marriage and Civil Partnership	No direct benefits. Indirect benefits of carbon reduction. Indirect benefits of LCC financial sustainability across its wider services.	No	<p><u>Initial EIA Assessment</u></p> <p>No concerns were initially identified on the basis of marriage and civil partnership.</p> <p><u>What people have told us about their concerns</u></p> <p>No concerns have been raised, however, this will continue to be monitored.</p>
Sexual Orientation	No direct benefits. Indirect benefits of carbon reduction.	Yes	<p><u>Initial EIA Assessment</u></p> <p>LGBT+ residents may feel fearful and vulnerable to hate incident/crime because of this proposal. This could impact on their choices about evening activities, which may mean an increase in social isolation for some.</p>

	<p>Indirect benefits of LCC financial sustainability across its wider services.</p>		<p><u>What people have told us about their concerns</u></p> <p>577 respondents gave information on their sexual orientation. Of the respondents not identifying as heterosexual, 70% felt that the proposals would impact them. Fear of crime and personal safety were the main reasons. 10% said they would change their behaviour as a result.</p> <p><u>Mitigations</u></p> <p>A risk assessment of those areas where there could be a greater likelihood of harm occurring was conducted and it identified some situations where lights will not be subject to proposed dimming (see part two of the document for further details).</p> <p>Retaining a reduced level of lighting albeit at a reduced level should also reduce adverse impacts to some extent.</p> <p>Crime and antisocial behaviour levels will be monitored with the police and emergency services and lighting levels can be amended temporarily via the Central Management System if required.</p> <p>Continuing to listen to the residents and acting on any complaints or enquires to elected members on increased individual risk.</p>
<p>Pregnancy and Maternity</p>	<p>No direct benefits. Indirect benefits of carbon reduction. Indirect benefits of LCC financial sustainability across its wider services.</p>	<p>Yes</p>	<p><u>Initial EIA Assessment</u></p> <p>A potential greater risk of slips trips and falls may disproportionately impact pregnant women. There may also be a perception of being more at risk of crime and antisocial behaviour. This could impact on their choices about evening activities which may mean an increased in social isolation for some. There could be concerns about travel to access maternity care during the hours impacted by the proposal.</p>

		<p><u>What people have told us about their concerns</u></p> <p>This did not emerge as a specific concern during the engagement.</p> <p><u>Mitigations</u></p> <p>Whilst pregnancy alone may not result in increased risk, pregnant women who are unwell or who have certain disabilities may be at more risk generally when out on dark evenings.</p> <p>Pregnant women with these additional challenges may be more vulnerable. Those known to NHS services should be in receipt of advice on how to manage risk, from their GP and NHS maternity services.</p> <p>A risk assessment of those areas where there could be a greater likelihood of harm occurring was conducted and it identified some situations where lights will not be subject to proposed dimming (see part two of the document for further details).</p> <p>Retaining a reduced level of lighting albeit at a reduced level should reduce adverse impact to some extent.</p> <p>Running a safety campaign through the winter to remind people how to stay safe and visible during dark nights in winter.</p> <p>Monitoring any increased reported risk to people from this protected characteristic as part of a pilot project and taking action where necessary working closely with the police and emergency services.</p> <p>Crime and antisocial behaviour levels will be monitored with the police and emergency services and lighting levels can be amended temporarily via the Central Management System if required.</p>
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			Continuing to listen to the residents and acting on any complaints or enquires to elected members on increased individual risk.
Religion or Belief	No direct benefits. Indirect benefits of carbon reduction. Indirect benefits of LCC financial sustainability across its wider services.	Yes	<p><u>Initial EIA Assessment</u></p> <p>The proposal could impact members of faith communities attending or returning from places of worship during the times affected by the proposals. There may be a perception of increased risk of violence or antisocial behaviour against this group.</p> <p><u>What people have told us about their concerns.</u></p> <p>People from different religions cited their main reasons for disagreeing with the proposal were fear of crime and general vulnerability.</p> <p><u>Mitigations</u></p> <p>A risk assessment of those areas where there could be a greater likelihood of harm occurring was conducted and it identified some situations where lights will not be subject to proposed dimming (see part two of the document for further details).</p> <p>Retaining lighting albeit at a reduced level, should also reduce adverse impacts to some extent.</p> <p>Running a safety campaign through the winter to remind people how to stay safe and visible during dark nights in winter.</p> <p>Monitoring any increased reported risk to people from this protected characteristic as part of a pilot project and taking action where necessary working closely with the police and emergency services.</p>

			Crime and antisocial behaviour levels will be monitored with the police and emergency services and lighting levels can be amended temporarily via the Central Management System if required.
Other groups: e.g., rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, deprived, armed forced, or disadvantaged communities	No direct benefits. Indirect benefits of carbon reduction. Indirect benefits of LCC financial sustainability across its wider services.	Yes	<p><u>Initial EIA Assessment</u></p> <p>Some people in any of these other groups may have a perception of being more at risk of crime or antisocial behaviour. This could impact on their choices about evening activities, which may mean an increase in social isolation for some.</p> <p>Carers may also have concerns about lower-level lighting when travelling during late or early hours to carry out their duties.</p> <p><u>What people have told us about their concerns</u></p> <p>The LECG has identified people in rural communities as being affected by change although it is not clear how. As Leicestershire is made up of many rural communities, any patterns that emerge during the pilot will be looked into and an appropriate action will then be taken.</p> <p>Although no specific concerns have emerged about carers, it is noted that these are predominantly women, and covered by relevant mitigations.</p>

6- Way forward	
How will the action plan and recommendations of this assessment be built into decision making and implementation of this proposal?	Will be included in the report presented to the Cabinet in December 2023 for its approval.
How would you monitor the impact of your proposal and keep the EIA refreshed?	As in this draft of the document, this document will be updated following quarterly monitoring identifying any new patterns, trends and unforeseen consequences. The document will be submitted for 6-monthly reviews to the DEG.
Sign off by DEG Chair/Director or Head of Services	Ann Carruthers 07/11/23