

Response to Request for Information

Reference FOI 001632
Date 30 October 2017

Road Closures for Civic/Wulfrun Events – October 2017 onwards

Request:

Could I request the documents concerning the impact assessment Wolverhampton Council made respecting its obligations under the Disability Discrimination Act 2010 when making plans to close off Red Lion Street, and Mitre Fold during events at the Civic and Wulfrun Halls.

I will draw your attention to the fact that there are disabled parking spaces that can only be accessed via those roads.

[In response to your request please find our response below:](#)

Appendix 1 - Equality Analysis Form

Equality Analysis Template.

Directorate: People Service Area: Public Health and Wellbeing	Lead Officer: Neil Rogerson Resilience Manager Date completed: 06 th Nov 2017
Procedure to be assessed: Hostile Vehicle Mitigation Plan	
Is this: New / Proposed <input type="checkbox"/> Existing/Review <input checked="" type="checkbox"/> Changing <input type="checkbox"/> (Please tick appropriate box)	Review date: Nov 2019 or depending on changed security situation

Part A – Initial Equality Analysis to determine if a full Equality Analysis is required.

What are the aims and objectives/purpose of this procedure?

To protect the crowd queueing to enter the Civic Halls from terrorist attack by vehicle ramming.

[NOT PROTECTIVELY MARKED]

Please indicate its relevance to any of the equality duties (below) by selecting Yes or No?

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment	X	
Advancing equality of opportunity		X
Fostering good community relations	X	

If not relevant to any of the three equality duties and this is agreed by your Head of Service, the Equality Analysis is now complete - please send a copy to the Equality & Diversity Team. If any of the three equality duties are relevant, a Full Equality Analysis will need to be undertaken (PART B below).

PART B: Full Equality Analysis.

Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)

What outcomes are sought and for whom?	Maximise public safety from vehicular terrorist attack within the bounds of what is practical in a busy public space.
Are there any associated policies, functions, services or procedures?	CONTEST Prepare & Protect Workplan Resilience Team Traffic and Road Safety Team Visitor Economy Connected Places Board
If partners (including external partners) are involved in delivering the service, who are they?	Hardstaff Barriers Ltd Swords Traffic Management

Step 2 – What does the information you have collected, or that you have available, tell you?

What evidence/data already exists about the service and its users? (in terms of its impact on the 'equality strands', i.e. race, disability, gender, gender re-assignment, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

It is accepted that security and access are often oxymoronic. This EA looks at the principles of public life in the current climate of recent terrorist attacks on the mainland of the UK involving attack by vehicle. The Council is seeking to protect the public as best as it reasonably can and this is its paramount concern. As such the Article 2 of the Human Rights Act the Right to life is the paramount concern. Nevertheless, so that business can continue as easily as is possible and desirable in this climate the Council will do what is possible with existing resources to mitigate any adverse impacts and foster good relations between communities.

Closures of Red Lion, Corporation Street and Mitre Fold during events will not disrupt access to any disabled parking bays as access to the bays situated on Exchange Street, Cheapside and North Street remain accessible via a slight diversionary route from the Darlington Street/ Waterloo Road junction as follows:

School Street, Salop Street, Victoria Street, Queen's Square before turning left into Exchange Street as there are exemptions for blue badge holders along the pedestrianised zones on Victoria Street and Queens Square.

Has there been any consultation with, or input from, customers / service users or other stakeholders? If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

Yes. A meeting was held with various colleagues and organisations to consider all aspects of this emerging policy on Monday 25th July 2017.

Numerous subsequent meetings have been held between Traffic and Road Safety, Resilience and Visitor Economy.

A formal HVM Programme Board has also been established. It is chaired by Service Director for City Environment and attendees from Communications, Traffic and Road Safety, Governance (Licensing), Town Planning, Visitor Economy and Equalities have

been invited.

Local businesses of Red Lion Street have been consulted with the key services/organisations being CWC Parking Services, Wolverhampton Magistrates Court, BT Telephone Exchange and the Catholic Church of St Peter and St Paul.

The main concerns raised were regarding access to businesses and private parking on Red Lion Street.

Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?

The Catholic Church of St Peter and St Paul is the most affected as they do not always know who will be attending their services. Other businesses have complemented the council on keeping them informed and arranging a process to mitigate the impact. This tells us that our consultative approach is being well received.

Step 3 – Identifying the negative impact.

a. Is there any negative impact on individuals or groups in the community?

Barriers:

What are the potential or known barriers/impacts for the different 'equality strands' set out below? Consider:

- **Where** you provide your service, e.g. the facilities/premises;
- **Who** provides it, e.g. are staff trained and representative of the local population/users?
- **How** it is provided, e.g. do people come to you or do you go to them? Do any rules or requirements prevent certain people accessing the service?
- **When** it is provided, e.g. opening hours?
- **What** is provided, e.g. does the service meet everyone's needs? How do you know?

* Some barriers are justified, e.g. for health or safety reasons, or might actually be

[NOT PROTECTIVELY MARKED]

	<p>designed to promote equality, e.g. single sex swimming/exercise sessions, or cannot be removed without excessive cost. If you believe any of the barriers identified to be justified then please indicate which they are and why.</p> <p>Solutions:</p> <p>What can be done to minimise or remove these barriers to make sure everyone has equal access to the service or to reduce adverse impact? Consider:</p> <ul style="list-style-type: none"> • Other arrangements that can be made to ensure people's diverse needs are met; • How your actions might help to promote good relations between communities; • How you might prevent any unintentional future discrimination. 		
Equality Themes	Positive Impacts	Negative Impacts identified	Solutions (ways in which you could mitigate the negative impact)
<p>Age (including children, young people and older people)</p>	<p>Customers attending the Civic Halls, who are less able to physically evade a vehicle ramming attack, will benefit from heightened protection.</p>	<p>Impact if protection prevents accessible space to drop off elderly visitors to Civic Halls.</p> <p>Impact if protection prevents access to parking for local businesses.</p>	<p>Elderly blue badge holders can be dropped off on Cheapside or North Street.</p> <p>Neighbours have been consulted with car permits issued to allow access to Red Lion Street.</p>
<p>Disability (including carers)</p>	<p>Customers attending the Civic Halls, who are less able to physically evade a vehicle ramming attack, will benefit from heightened protection.</p>	<p>Impact if protection prevents accessible space to drop off disabled visitors to the Civic Halls.</p> <p>Impact if protection prevents access to parking for local businesses.</p>	<p>Disabled blue badge holders can be dropped off on Cheapside or North Street.</p> <p>Neighbours have been consulted with car permits issued to</p>

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			allow access to Red Lion Street.
Gender (men and women)	No direct or indirect positive impact.	No direct or indirect positive impact	
Race (including Gypsies & Travelers and Asylum Seekers)	No direct or indirect positive impact.	No direct or indirect positive impact	
Religion or belief (including people of no religion or belief)		Protection will restrict access to parking at the Catholic Church of St Peter & St Paul.	The church has been consulted and issued with a large number of permits. A representative from the church has been invited to locate themselves with the officers closing the road when necessary.
Gender Re-assignment (those that are going or have gone through a transition: male to female or female to male)	No direct and or indirect positive impact	No direct and or indirect positive impact	
Pregnancy and Maternity	Customers attending the Civic Halls, who are less able to physically evade a vehicle ramming attack, will benefit from heightened protection.	Loss of drop off spaces close to the Civic Halls for pregnant women and carers of babies.	While it is unlikely that large numbers of heavily pregnant women and carers with babies will attend events at the Civic Halls drop off on Darlington Street, Victoria Street and Wulfruna Street are still available.

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			Parking spaces will still be available in the Civic Centre Carpark.
Sexual orientation (including gay, lesbian, bisexual and heterosexual)	No direct or indirect positive impact	No direct or indirect positive impact	
Marriage and Civil Partnership	No direct or indirect positive impact	Weddings and blessings at the church may be impacted due to the road closure.	The church has been consulted and issued with a large number of permits. A representative from the church has been invited to locate themselves with the officers closing the road when necessary.
Human Rights	The actions considered in principle are intended to protect the right to life. (Article 2)		

Step 4 – Changes or mitigating actions proposed or adopted

Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure? What changes or mitigating actions are proposed?

The proposed solutions involve offering the Civic Hall's neighbouring properties vehicle permits to allow them to pass through the first road closure on Red Lion Street. Further arrangements have been made with the BT telephone exchange to allow them to pass through the road closure on Mitre Fold.

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Step 5 – Monitoring

How are you going to monitor the existing service, function, policy or procedure?

On a day to day basis, the procedure is managed by Visitor Economy, with initial support from both Traffic and Road Safety Team and the Resilience Team. Programme management and oversight will be provided by the Service Director for City Environment. Progress will be reported to the CONTEST Board and the Connected Places Board on a quarterly basis.

Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale
Access to private parking on Red Lion Street.	Consultation with neighbouring properties.	Resilience Manager	Week before procedure initiation.
Access to private parking on Red Lion Street.	Issuing of initial and follow up vehicle permits	Resilience Manager	First two weeks of procedure initiation.
Access to private parking on Red Lion Street.	Ongoing issuing of parking permits throughout procedure period.	Head of Visitor Economy	Week three onwards.

[NOT PROTECTIVELY MARKED]

Equality Analysis approved by:

Head of Service: Neil Rogerson	Date: 11/07/2017
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