Integrated Impact Assessment (IIA) (including equality, environment, health, human rights, socio-economic Duty, United Nations Conventions the Rights of the Child and Welsh language

Name of Policy or Practice	Street Lighting Policy		
Responsible Officer (responsible for the Policy or Practice)	Darell Jones		
Service / Portfolio	Streetscene and Transportation	Start Date of Assessment	29 th November 2023

Name of officer(s) (and partners) completing the IIA			
Name(s)	Job Title(s)	Signature(s)	
Darell Jones	Operational North and Street Lighting Manager		
Katie Wilby	Chief Officer Streetscene and Transportation		
Barry Wilkinson	Highway Network Manager		

*Consider including only job titles when publishing

Document Version	Revision Date	Briefly Describe the Changes	IIA Approved by Responsible Officer / Portfolio / Service / Committee	
			Date IIA Concluded	
			Name	
			Job Title	
			Signature	

Introduction

This document is a multi-purpose tool ensuring the appropriate steps are taken to comply with the Public Sector Equality Duty (PSED) Equality Impact Assessment legislation and to demonstrate that we have shown due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage when taking strategic decisions under the <u>Socio-economic Duty</u>. It also incorporates <u>Welsh Language impacts</u>, environmental and bio-diversity impacts, health impacts and United Nations Conventions Rights of a Child.

When we plan to introduce a new, or revise an existing, policy, strategy or practice, develop a new service, make changes or cuts to a service or make strategic decisions, we are required to consider if the decision would have a disproportionate impact on people sharing one or more <u>protected characteristic</u> or whether it could create inequalities of outcome around socio-economic disadvantage. Where this is likely to be the case, we must take appropriate action. The IIA process is not intended to prevent us doing things but to ensure we have considered the impact. It helps us focus on the actions we can take to remove and/or mitigate any disproportionate or discriminatory impact and introduce measures to advance equality of opportunity.

To comply with the PSED General Duty and <u>Socio-economic Duty</u>, we must have 'due regard' (or consciously consider the need) to: eliminate discrimination, advance equality of opportunity and foster good relations and to the need to reduce the inequalities of outcome resulting from socio-economic disadvantage. The greater the relevance and potential impact, the higher the regard required by the duty. The General Duty will be more relevant to some functions than others and they may also be more relevant to some protected characteristics than others. <u>Our duty must be exercised with rigour</u>, an open mind and considered at a time when it can make a difference to our decisions. Policies with high relevance, such as strategic budgetary decisions, grant-making programmes, changes to service delivery (including withdrawal or reorganisation of services), and recruitment or pay policies should always be subject to an assessment for impact. For further guidance see <u>EHRC Assessing Impact Guidance</u>. Our duty to comply with this legislation cannot be delegated.

This form should demonstrate the steps taken to carry out the assessment including relevant engagement/consultation, the information taken into account, the results of the assessment and any decisions taken in relation to those results. The IIA should be published where it shows a substantial (or likely) impact on our ability to meet the PSED.

Benefits of undertaking an IIA:

- Gain a better understanding of those who may be impacted by the policy or practice
- Better meet differing needs and become more accessible and inclusive
- Enable planning for success identifies potential pitfalls and unintended consequences before any damage is done
- Enable improved planning that will make decisions proactive rather than reactive, avoid having to reverse decisions which could have cost and reputational implications
- Demonstrate decisions are thought through and have taken into account the views of those affected
- Enable us to manage expectations by explaining the limitations within which we are working (e.g. budget)
- Help avoid risks and improve outcomes for individuals
- Remove inappropriate or harmful practices and eliminate institutional discrimination

- Ensure we put Welsh and English Language on an equal footing. and that decisions are made that safeguard and promote the use of the Welsh language
- Improve and protect health, maximising health benefits and reducing health risks
- Be more open and transparent
- Use our resources more effectively

Whilst this document may seem lengthy, as well as containing the necessary steps in the process, it also contains guidance notes in the key areas to assist you in undertaking the IIA. Additional links to further information are also included for assistance. Further information can be found on NHS/ WLGA PSED/ EIA <u>here.</u>

The Welsh Government¹ guidance states that:

Impact assessment prompts and guides us to gather, and if necessary, seek evidence so as to improve the development of a policy or delivery plan, or inform a change of direction in policy or delivery. It is a methodology to help in the development and implementation of policy, rather than templates with tick boxes and checklists.

Integrated Impact Assessment Steps

- Step 1 Identify the Main Aims and Objectives of the Policy or Practice
- Step 2 Data, Engagement and Assessing the Impact
- Step 3 Procurement and Partnerships
- Step 4 Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice
- Step 5 Decision to Proceed
- Step 6 Actions and Arrangements for Monitoring Outcomes and Reviewing Data
- Step 7 Publishing the Integrated Impact Assessment

Important Note to Completing Officer(s):

It is important that the IIA is completed when the policy or practice is being developed so that the findings from the IIA can be used to influence and shape the policy or practice. It is recommended as a minimum, it is completed by a lead officer who is responsible for the policy or practice, a subject matter expert and a critical friend with at least one who has received formal IIA training. This document needs to be presented to the decision makers along with the draft policy or practice as part of the decision making process.

¹ Welsh Government Integrated Impact Assessment Guidance

Where you are developing a high level strategy or plan that does not contain sufficient detail to show how it will impact on individuals or groups (i.e. where there will be plans and actions sitting beneath the strategy that will determine this), you should still undertake the Impact Assessment. You may also need to complete additional IIA(s) on the plans and actions beneath the high level strategy. This will ensure you demonstrate that you have shown due regard to complying with the <u>General Duty</u>, the <u>Public Sector Equality Duty</u>, the <u>Welsh Language Standards</u> the <u>Socio-economic Duty</u>, the Human Rights Act, the United Nations Conventions, Rights of the Child.

If your policy or practice is as a result of a UK, Welsh Government or Local Authority wide directive, you should still assess the impact of this locally to identify any differential impact due to local difference.

You should consider whether other events, e.g. COVID-19, Brexit, Black Lives Matter, etc. have highlighted or exacerbated inequalities that need to be addressed as you work through the IIA.

STEP 1 – Identify the Main Aims and Objectives of the Policy or Practice

- **1.** What is being assessed? (*Please double click on the relevant box(es) (X) and select 'checked' as appropriate)*
- New and revised policies, practices or procedures (which modify service delivery or employment practices)
- Service review or re-organisation proposals which affect the community and/or staff, e.g. early years provision, care, education
- Efficiency or saving proposals, e.g., resulting in a change in community facilities, activities, support or employment opportunities
- Setting budget allocations for new financial year and strategic financial planning
- Decisions affecting service users, employees or the wider community including (de)commissioning or revised services
- New project proposals affecting staff, communities or accessibility to the built environment, e.g. new construction work or adaptations to existing buildings, moving to on-line services, self-service, changing location
- Large Scale Public Events
- Local implementation of National Strategy/Plans/Legislation (refer to any national IIA and consider local impact)
- Strategic directive and intent, including those developed at Regional Partnership Boards and Public Service Boards which impact on a public bodies functions
- Medium to long term plans (for example, corporate plans, development plans, service delivery and improvement plans)
- Setting objectives (for example, well-being objectives, equality objectives, Welsh language strategy)
- Major procurement and commissioning decisions
- Decisions that affect the ability (including external partners) to offer Welsh language opportunities and services
- Other please explain in the box below:

2. What are the overall aims, objectives and intended outcomes of the policy or practice?

This Policy outlines the basic principles and standards applied to the maintenance, installation and adoption of Street Lighting, Illuminated and Electrical Street Furniture, setting out the aims of the authority with respect to maintenance and management regimes and the procedures put in place to achieve those aims.

The overall objective is to manage and maintain a safe, effective and efficient network that ensures the safety of all road users, pedestrians and cyclists.

The policy will apply to:

1. Flintshire County Council owned and maintained Carriageways, Highway, Footway, Open Spaces, Amenity, Streetscene and Transportation Electrical assets and Illuminated Lighting.

2. Flintshire County Council owned and maintained Illuminated and Electrical Street Furniture and associated equipment including CCTV, ticket machines etc.

3. Town and Community Council owned Lighting maintained by the County Council on their behalf and the relevant aspects of management and monitoring in accordance with the Highways Act 1980.

4. Outside of scope where other stakeholder wish to erect on or over the adoptable highway network or Streetscene and transportation infrastructure.

The street lighting policies have been developed to support the aims and objectives of other County Council strategies and initiatives by recognising that street lighting and illuminated street furniture plays a major part in helping to reduce crime, improving driver behaviour, pedestrian's visibility distances and promoting a safer community and reducing the fear of crime. (Crime and Disorder Act 1998)

3. Who are the main consultative groups (stakeholders)? Elected Members North Wales Street Lighting Group Clwydian Range and Dee Valley AONB

4. Is the policy related to, influenced by, or affected by other policies or areas of work (internal or external), e.g. strategic IIAs if this is an operational IIA and vice versa?

Towards Zero Waste <u>https://gweddill.gov.wales/topics/environmentcountryside/epq/waste_recycling/zerowaste/?lang=en</u> Climate Change Strategy

STEP 2 - Data, Engagement and Assessing the Impact

When completing this section, you need to consider if you have sufficient information with which to complete your IIA, or whether you need to undertake a period of engagement/consultation before continuing. The legislation relating to the IIA process requires you to **engage and involve** people who represent the interests of those who share one or more of the protected characteristics *and* with those who have an interest in the way you carry out your functions. The socio economic duty also requires us to take into account the voices of those in the community including those with lived experience of socio economic disadvantage. You should undertake engagement with communities of

interest or communities of place to understand if they are more affected or disadvantaged by your proposals. This needs to be proportionate to the policy or practice being assessed. <u>Remember that stakeholders can also include our own workforce as well as partner organisations.</u>

Before carrying out particular engagement activities, you should first look to data from recent consultations, engagement and research. This could be on a recent related policy or recent assessments undertaken by colleagues or other sources, e.g., <u>Is Wales Fairer?</u>, <u>North Wales Background</u> <u>Data Document</u>, Info Base Cymru, WIMD. This can help to build confidence among groups and communities, who can see that what they have said is being acted on. If you have very little or no information from previous engagement that is relevant to this IIA, you should undertake some engagement work with your stakeholders and with relevant representative groups to ensure that you do not unwittingly overlook the needs of each protected group. It is seldom acceptable to state simply that a policy will universally benefit/disadvantage everyone, and therefore individuals will be affected equally whatever their characteristics. The analysis should be more robust than this, demonstrating consideration of all of the available evidence and addressing any gaps or disparities. Specific steps may be required to address an existing disadvantage or meet different needs.

The Gunning Principles, established from past court cases, can be helpful in ensuring we apply fairness in engagement and consultation:

<u>Principle 1</u>: Consultation must take place when the proposals are still at a formative stage. You must not have already made up your mind. <u>Principle 2</u>: Sufficient reasons must be put forward to allow for intelligent consideration and response. Have people been given the information and opportunity to influence?

<u>Principle 3</u>: Adequate time must be given for consideration and response. Is the consultation long enough bearing in mind the circumstances? <u>Principle 4</u>: The product of consultation must be conscientiously taken into account when finalising the decision.

5. Have you complied with the duty to engage as described above and are you sufficiently informed to proceed?

Yes No (please cross as appropriate X)

6. If Yes, what engagement activities did you undertake and who with?

Engagement has taken place with:	
NWSLG ANOB	
Various Developers and Designers	
Internal Colleagues	
Elected Members	

7. If No, you may wish to consider pausing at this point while you undertake (further) engagement activities which you can include in the action plan below. Please incorporate any information obtained from this additional activity in the boxes in question 8.

Action	Dates	Timeframe	Lead Responsibility	Information added to IIA (✓)

8. What information do you hold about the impact on each of the following characteristic and statutory considerations / duties from your experience of current service delivery and recent engagement or consultation? Include any additional relevant data; research and performance management information; surveys; Government, professional body or organisation studies; Census data; Is Wales Fairer? (EHRC² data); complaints/compliments; service user data and feedback; inspections/ audits; socio-economic data including WIMD³ data. You may wish to include sub-headings showing where each element of your data has come from, e.g. national data, local data, organisation data, general or specific engagement exercises, etc.

Consider any positive or negative impact including <u>trends in data</u>, <u>geography</u> (urban or rural issues), <u>demography</u>, <u>access issues</u>, <u>barriers</u>, etc. Also include any areas where there are inequalities of outcome resulting from socio-economic disadvantage or other relevant issues identified by communities of interest or communities of place (i.e. where stakeholders, service users, staff, representative bodies, etc. are grouped together because of specific characteristics or where they live) and any issues identified for people living in less favourable social and/or economic circumstances.



Prompts for Equality Impact Asse

Equality and Human Rights

² Equality and Human Rights Commission

³ Wales Index of Multiple Deprivation

Protected Characteristic /Group	Relevant Data	Positive and / or Negative Impact	Prompts (not an exhaustive list)
Age	The policy ensures that lighting and electrical infrastructure is designed and maintained to accommodate the needs of all age groups, considering factors such as visibility, safety, and accessibility. Special attention has been given to areas frequented by older individuals to enhance their sense of security during night time hours.	Positive	Older People Children Young People Working Age People Young Families Demographics NB: Where children / young people are affected complete the <u>Childrens Rights Checklist</u> <u>United Nations Convention on the</u> <u>Rights of the Child (UNCRC)</u> Caring responsibilities
Disability	The revised policy places a strong emphasis on accessibility, with considerations for people with disabilities, including those with visual impairments. This includes the strategic placement of lighting and the use of tactile indicators to enhance safety for all community members.	Positive	Mobility / Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities Dementia Neurological difference / Autism Access to buildings/ facilities, induction loops, signage Access to communication methods, use of British Sign Language, Easy Read Carers Dietary requirements Other Long Term Health Conditions United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)
Gender Reassignment	Gender considerations have been integrated into the lighting design to address the safety concerns of all genders. This includes well-lit pathways and public spaces, taking into account potential vulnerabilities that may be associated with gender-based safety issues.	Neutral	A person who proposes to, starts or has changed their gender identity Transgender

Marriage & Civil Partnership	Adequate illumination is provided in areas frequented by this group to enhance their comfort and security during night time hours.	Neutral	Appropriate language use, i.e. gender neutral language, appropriate pronouns Gender neutral changing facilities
Pregnancy & Maternity	Adequate illumination is provided in areas frequented by this group to enhance their comfort and security during night time hours.	Neutral	assuming husband and wife relationships /terminology Pregnant mothers Those entitled to maternity and paternity leave Foster/Adoption Breastfeeding mothers Access to breast feeding facilities Dress codes/uniforms- do they accommodate pregnant women
Race	Cultural sensitivity has been a consideration in the revision process. Lighting designs are in place to avoid disproportionately affecting any particular racial or ethnic group negatively.	Neutral	Consider Ethnicity Nationality Gypsies / Travellers Language: interpreter provision Use of plain language Refugee / Asylum Seekers Migrants Positive Action Awareness events United Nations Convention on the Elimination of All Forms of Racial Discrimination (UNCERD)
Religion & Belief	Religion and Belief has been a consideration in the revision process. Lighting designs and guidance are in place to avoid disproportionately affecting any particular group negatively.	Neutral	Faith Communities Non Beliefs Dietary requirements Vegetarianism/Veganism Other philosophical beliefs Dress code/uniforms Religious festivals/activities Buildings – access to prayer room facilities

Sex	The lighting policy acknowledges the diverse makeup of the community, and efforts have been made to create an inclusive environment that is welcoming to individuals of all sexual orientations and gender identities. Safety considerations are applied uniformly without discrimination.	Positive	Men / Women Gender Identity Toilet facilities/baby changing Childcare Gender Pay Gap Sex workers <u>United Nations Convention on the</u> <u>Elimination of All Forms of</u> <u>Discrimination against Women</u> (UNCEDAW)
Sexual Orientation	The lighting policy acknowledges the diverse makeup of the community, and efforts have been made to create an inclusive environment that is welcoming to individuals of all sexual orientations and gender identities. Safety considerations are applied uniformly without discrimination.	Positive	Gay Lesbian Bi-sexual Heterosexual Terminology - Avoid making assumptions about a person's sexual orientation use gender- neutral terms such as partner(s). Confidentiality about sexuality Further resources available from Stonewall Cymru
Socio-economic Considerations- Reducing inequalities caused by socio-economic disadvantage	 Improving the visual environment during dark hours by improved waste management and clearance improves local environmental quality which has been linked to improving individuals wellbeing and reducing crime The revised streetlighting policy aims to enhance the safety and security of residents and pedestrians by ensuring adequate illumination in key areas. We have conducted an analysis to identify vulnerable communities and have incorporated additional lighting measures in those areas to address potential safety concerns. The estimated cost of implementing the new streetlighting policy is X amount. However, the policy and reduced maintenance costs associated with the adoption of energy-efficient technologies. This aligns with our commitment to sustainability and cost-effectiveness. 	Positive	 People living in less favourable social and economic circumstances than others in the same society. Disadvantage may be exacerbated by many factors of daily life, not just urban or rural boundaries. 'Intersectionality' issues - where identity compounds socio-economic status, e.g., single parents (often women), disabled people, some BAME groups. Examples include lower levels of good health, lower paid work, poorer educational attainment and an increased risk of being a victim of crime Further resources available from Welsh Government including

	The revised policy emphasizes the use of energy-efficient LED lighting and considers strategies to minimize light pollution. This aligns with our environmental goals, aiming to reduce the carbon footprint of street lighting while maintaining visibility and safety. We anticipate a significant decrease in energy consumption as a result of these measures. To address potential health effects, the policy includes guidelines on the intensity and direction of lighting to minimise disruption to residents' sleep patterns. Additionally, we are committed to monitoring and addressing any reported health concerns associated with the revised street lighting. The revised policy places a strong emphasis on accessibility, with considerations for people with disabilities, including those with		examples of inequalities of outcome caused by socio- economic disadvantage inequalities of outcome.pdf
	visual impairments. This includes the strategic placement of lighting and the use of tactile indicators to enhance safety for all community members.		
Human Rights	Right to Life: The revised policy, by enhancing visibility and safety through improved street lighting, contributes positively to the right to life. Adequate illumination in public spaces can help prevent accidents and criminal activities, safeguarding the well-being of residents.	Positive	See Human Rights Articles below. https://humanrightstracker.com/en/ on EHRC website
	Right to Security and Privacy: While improved lighting enhances security, it is essential to strike a balance with the right to privacy. The policy incorporates measures to ensure that the increased illumination does not intrude on the privacy of residents and respects their right to a private life.		
	Freedom of Movement: Adequate street lighting is essential for facilitating freedom of movement, especially during night time hours. The policy ensures that residents can move freely and safely within the community, supporting this fundamental human right.		10

Non-Discrimination: The policy is designed to be non- discriminatory, considering the needs of all residents regardless of their background, ensuring equal access to well-lit and safe public spaces. Efforts have been made to prevent any discriminatory impact on specific groups. Right to Participate in Cultural Life: The policy is crafted with consideration for the cultural life of the community. Lighting designs respect cultural and historical aspects, contributing positively to residents' ability to participate in cultural activities and events.	
Right to an Adequate Standard of Living: The policy may have economic implications related to the cost of implementation, but it also aims to contribute to an adequate standard of living. Energy- efficient measures can lead to cost savings for both the community and individuals, positively impacting their economic well-being.	
Right to Health: The policy addresses potential health concerns associated with lighting, ensuring that the intensity and direction of light are conducive to the well-being of residents. Monitoring mechanisms are in place to identify and mitigate any health- related issues.	
Right to an Effective Remedy: Residents have the right to an effective remedy in case of any negative impacts or grievances related to the street lighting policy. Transparent procedures for addressing complaints and providing remedies have been established.	
Right to Enjoyment of Public Spaces: The policy contributes to the right to enjoyment of public spaces by ensuring well-lit and safe environments. This enhances residents' ability to use and enjoy public spaces, fostering community engagement and social interaction.	1

	Right to a Healthy Environment: The policy aligns with the right to a healthy environment by incorporating energy-efficient technologies and measures to minimise environmental impacts,		
Other (please state)	 contributing to the overall well-being of the community. The revised policy is fully compliant with existing local, national, laws and regulations governing streetlighting. It adheres to environmental standards and lighting ordinances to ensure responsible and lawful implementation. The updated specification incorporates state-of-the-art LED technology, allowing for increased efficiency and reliability. Smart lighting features have also been integrated to enable remote monitoring and control, contributing to a more responsive and adaptive lighting system. 	Positive	E.g., Modern Slavery, Safeguarding, Other COVID effects, Carers, Ex-offenders, Veterans, Care Leavers, Substance Abuse, Homeless
	Welsh Language		
Welsh Language	All correspondence whether verbal, digital or physical can be communicated through the medium of Welsh	Positive	Ensuring equal status of both Welsh and English languages. Availability of and access to services, activities and information. Availability of Welsh speaking employees Technology Rights of individuals to ask for WL services. Impact on Welsh speaking communities, including: Positive / negative effects on opportunities to use the WL. Possible changes to number/percentage of Welsh speakers Migration Job opportunities / Staffing changes. Training needs and opportunities

	Availability of Welsh medium education.	m
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Human Rights Act 1998		Article 8	Respect for private life, family, home and correspondence
Article 2	Right to life	Article 9	Freedom of thought, belief and religion
Article 3	Freedom from torture and inhuman or degrading treatment	Article 10	Freedom of expression
Article 4	Freedom from Slavery and forced labour	Article 11	Freedom of Assembly and association
Article 5	Right to liberty and security	Article 12	Right to marry and start a family
Article 6	Right to a fair trial	Article 13	Right to access effective remedy if rights are violated
Article 7	No punishment without law	Article 14	Protection from discrimination

Environment and Biodiversity				
	Relevant Data/Information	Positive and /or negative impacts	Prompts (not an exhaustive list)	
Reducing greenhouse gas emissions	 The effective management of street lighting and electrical assets plays a pivotal role in reducing greenhouse gas emissions through the strategic implementation of energy-efficient technologies and sustainable practices. The revised streetlighting policy incorporates the use of LED (Light Emitting Diode) technology, which is known for its significantly lower energy consumption compared to traditional lighting systems. By transitioning to LED lighting, the local authority aims to achieve a substantial reduction in electricity consumption for street lighting, directly contributing to a decrease in associated greenhouse gas emissions. Additionally, smart lighting controls and monitoring systems are integrated, allowing for precise management of lighting levels and faults based on real-time needs. 	Positive	Will energy need be met through renewable sources? Will it reduce greenhouse gas emissions by reducing energy consumption and the need to travel? * Will it reduce ozone depleting emissions? Will it reduce emissions through retrofitting new technology? Will it reduce heat island effects on people and property?	

	Environment and Biodiversity		
	Relevant Data/Information	Positive and /or negative impacts	Prompts (not an exhaustive list)
	This intelligent management ensures that traffic signals effectively where employed, minimising unnecessary energy usage and further lowering the carbon footprint.		
	The commitment to sustainable street lighting and electrical infrastructure not only enhances environmental stewardship but also aligns with broader initiatives to mitigate climate change and create a more eco-friendly urban infrastructure.		
Plan for future climate change	The revised street lighting policy strategically addresses future climate change by prioritising energy-efficient LED technology, smart lighting controls for adaptive energy use, and potential integration with renewable energy sources.	Positive	Will it minimise flood risk from all sources of flooding? * Will it reduce property damage due to storm events/heavy rainfal by improving flood resistance and flood resilience?
	Resilience measures are incorporated into infrastructure design and maintenance.		Will it reduce combined sewer overflow events? Will it encourage the re-use of resources?
	The policy emphasises the adaptability to a changing climate and contributes to local climate resilience and sustainability goals.		Will it encourage sustainable construction methods and procurement? Will it encourage water efficiency and drought resilience?
Pollution: air/, water/ soil/noise and vibration and emissions	The revised street lighting policy addresses light pollution by incorporating measures to minimise unnecessary brightness, glare and upward waste illumination.	Positive	Will it reduce combined sewer overflow events? Will it improve air quality? * Will it reduce emissions of key pollutants?
	It promotes the use of G6 glare reduction technology, shielding and directed lighting fixtures to reduce upward light spill thus enhancing the visibility while mitigating the adverse effects on the night sky and surrounding environments.		Will it reduce noise concerns and noise complaints? Will it reduce noise levels?
	The policy encourages the implementation of new technologies and smart lighting controls that allow for adaptive part night		

	Environment and Biodiversity	y	
	Relevant Data/Information	Positive and /or	Prompts
		negative impacts	(not an exhaustive list)
	applications, dimming and trimming during off-peak hours, further minimising light pollution and carbon output.		
	Electric vehicle (EV) charging infrastructure considerations have been made, the policy supports sustainability by exploring opportunities to integrate EV charging stations within the streetlight infrastructure.		
Integrating biodiversity into decision making	The revised streetlighting policy integrates biodiversity considerations into decision-making by emphasising environmentally conscious practices. It includes measures such as the strategic placement of streetlights to minimise disruption to local ecosystems, especially in sensitive habitats. The policy encourages the use of lighting solutions that have reduced impact on nocturnal wildlife, helping to preserve natural behaviours. The decision-making process considers the potential ecological impacts, aiming to strike a balance between providing adequate lighting for safety and minimising disturbances to the surrounding flora and fauna. This approach reflects a commitment to sustainable urban development that harmonises with and contributes to the preservation of local biodiversity.	Positive	Have you considered the impacts and opportunities for action for biodiversity at early stages Are the impacts of procurement on biodiversity considered? Are products sourced sustainably? Have the wider benefits of improved biodiversity been considered, flood prevention, health and wellbeing, recreation? Can you link with other strategies and initiatives for biodiversity e.g. FCC Environment and Sustainability policy, FCC Section 6 Plan, FCC Urban tree and woodland plan?
Increasing the resilience of our natural environment?	The revised streetlighting policy enhances the natural environment's resilience through eco-friendly practices, including minimising light pollution and strategic fixture placement.	Positive	Does the proposal work with nature and consider the use of nature based solutions first and foremost? Does your proposal support the creation of new habitats (in

	Environment and Biodiversity	/	
	Relevant Data/Information	Positive and /or	Prompts
		negative impacts	(not an exhaustive list)
	Energy-efficient technologies like LED lighting further contribute to sustainability, collectively fostering a more resilient and sustainable ecosystem.		addition to any mitigation or compensation habitat) Does it contribute to the restoration of degraded habitats? Does it improve site management to improve nature value?
Improving understanding and raise awareness of the importance of biodiversity	Energy-efficient technologies like LED lighting further contribute to sustainability, collectively fostering a more resilient and sustainable ecosystem.	Neutral	Can your proposal promote understanding of biodiversity? Can the delivery of public goods and services such as social care, community health and recreation promote biodiversity? Can your proposal promote biodiversity with partners/beneficiaries
Encouraging resource efficiency (energy, water, materials and minerals)	Energy-efficient technologies like LED lighting further contribute to sustainability, collectively fostering a more resilient and sustainable environment.	Neutral	Will it reduce water consumption and improve water efficiency? Will it reduce energy consumption? *
Reducing waste production and increase recycling, recovery and re- use of waste	The revised streetlighting policy reduces waste production by prioritising durable technologies like LED lighting, extending product lifespan, and endorsing responsible disposal practices in line with WEEE guidelines. This approach minimises electronic waste generation and fosters sustainability in streetlight infrastructure.	Positive	Will it reduce consumption of materials and resources? Will it reduce household waste? Will it increase recycling, recovery and re-use? Will it reduce construction waste?
Reducing need to travel and promote sustainable forms of transport	Electric vehicle (EV) charging infrastructure considerations have been made, the policy supports sustainability by exploring opportunities to integrate EV charging stations within the streetlight infrastructure.	Positive	Will it reduce volumes of traffic? Will it encourage walking and cycling?* Will it increase proportion of journeys using modes other than the car?

	Environment and Biodiversity			
	Relevant Data/Information	Positive and /or negative impacts	Prompts (not an exhaustive list)	
	By reducing waste production by prioritising durable technologies like LED lighting, extending product lifespan etc this therefore reduce the need for spares transportation and maintenance visits.			
Improving the physical environment: housing, public space, access to and quality of green space	The revised streetlighting policy improves the physical environment by introducing light sources such as LED lighting for energy efficiency, strategically placing fixtures to enhance aesthetics, and integrating green elements for improved air quality and biodiversity.	Positive	Will it reduce litter?Will it enhance the quality ofpublic realm?Will it improve access andmobility for all equality groupsWill it improve open space?Will it improve landscapecharacter?Will it minimise development onGreenfield sites	
Protecting and enhancing the historic environment and architectural, archaeological and cultural heritage	No impact foreseen	Neutral	Will it protect heritage sites and cultural value? Will it protect strategic views? Will it protect listed buildings and their settings? Will it help preserve, enhance and record archaeological features and their settings?	

	Health		
Determinants of health	Relevant data /information	Positive and /or negative impacts	Prompts (not an exhaustive list) Guidance from HIA_Tool_Kit_V2_W EB.pdf

	Health			
Determinants of health	Relevant data /information	Positive and /or negative impacts	Prompts (not an exhaustive list) Guidance from	
Lifestyles	 By promoting and complying to the updated policy and thus implementing of the maintenance and installation requirements, this will assist and support the natural environment and will be improved the visual aspect and illumination. This in turn will encourage residents and road users alike to travel and venture out more in the darker hours for social and physical activities. This not only improves the local environmental quality but also the fear of safety which has been linked to improving individuals wellbeing and reducing crime. 	Positive	Diet Physical activity Use of alcohol, cigarettes, non- prescribed drugs Sexual activity Other risk-taking activity	
Social and community influences on health	The overall result is a safer, more sustainable, and aesthetically pleasing urban environment that enhances the well-being and lifestyle of the community.	Positive	Family organisation and roles Citizen power and influence Social support and social networks Neighbourliness Sense of belonging Local pride Divisions in community Social isolation Peer pressure Community identity Language/Cultural and spiritual ethos Racism Other social exclusion	

	Health				
Determinants of health	Relevant data /information	Positive and /or negative impacts	Prompts (not an exhaustive list) Guidance from HIA_Tool_Kit_V2_W EB.pdf		
Mental well-being	The revised streetlighting policy positively affects mental well- being by creating well-lit and safer public spaces. Adequate lighting, especially during night time, promotes a sense of security and reduces feelings of vulnerability, contributing to overall peace of mind for residents and pedestrians. Additionally, the policy's consideration of minimising light pollution helps maintain a natural night environment, which can positively impact sleep patterns and circadian rhythms, thus supporting mental well-being. By fostering a safer and more harmonious urban environment, the street lighting policy contributes to the overall mental health and well-being of the community.	Positive	Does this proposal support sense of control? Does it enable participation in community and economic life? Does it impact on emotional wellbeing and resilience?		
Living/environmental conditions affecting health	The revised street lighting policy positively affects mental well-being by creating well-lit and safer public spaces. Adequate lighting, especially during night time, promotes a sense of security and reduces feelings of vulnerability, contributing to overall peace of mind for residents and pedestrians. Additionally, the policy's consideration of minimising light pollution helps maintain a natural night environment, which can positively impact sleep patterns and circadian rhythms, thus supporting mental well-being. By fostering a safer and more harmonious urban environment, the streetlighting policy	Positive	Built environment Neighbourhood design Housing Indoor environment Noise Air and water quality Attractiveness of area Green space Community safety Smell/odour Waste disposal Road hazards Injury hazards Quality and safety of play areas		

	Health			
Determinants of health	Relevant data /information	Positive and /or negative impacts	Prompts (not an exhaustive list) Guidance from HIA_Tool_Kit_V2_W EB.pdf	
	 contributes to the overall mental health and well-being of the community. The overall result is a safer, more sustainable, and aesthetically pleasing urban environment that enhances the well-being and lifestyle of the community. 			
Economic conditions affecting health	 Improved street lighting contributes to enhanced safety, potentially reducing crime rates and associated healthcare costs. Well-lit public spaces can promote community engagement and local economic activities, fostering a healthier and more vibrant environment. Additionally, the use of energy-efficient technologies in the policy may lead to cost savings for both the authority and residents, indirectly affecting economic well-being. By creating safer environments and supporting local economic vitality, the revised streetlighting policy can contribute positively to the economic influences on health within a community. 	Positive	Unemployment Income Economic inactivity Type of employment Workplace conditions	
Access and quality of services	Well-lit public spaces can promote community engagement and local economic activities, fostering a healthier and more vibrant environment. With the use of energy-efficient technologies leading to cost savings for both the authority and residents alike.	Positive	Medical services Other caring services Shops and commercial services Public amenities Transport including parking	

	Health		
Determinants of health	Relevant data /information	Positive and /or negative impacts	Prompts (not an exhaustive list) Guidance from HIA_Tool_Kit_V2_W EB.pdf
	The revised street lighting policy also enhances access to services by improving safety and visibility, especially during non daylight hours. It contributes to higher service quality, particularly in emergency response, public transportation, and community amenities.		Education and training Information technology
Macr-economic, environmental and sustainability factors	 The revised streetlighting policy has multifaceted influences on macro-economic, environmental, and sustainability factors. From a macro-economic perspective, the policy can stimulate local economic activity by creating safer and more inviting public spaces, potentially attracting businesses and encouraging community engagement. Environmentally, the integration of energy-efficient technologies, such as LED lighting, reduces energy consumption, lowering associated carbon emissions and contributing to environmental sustainability. In terms of broader sustainability, the policy supports long-term resource efficiency, enhances biodiversity through thoughtful urban planning, and promotes a resilient and eco-friendly infrastructure. Overall, the revised streetlighting policy contributes positively to macro-economic development, environmental conservation, and long-term sustainability goals. 	Positive	Government policies Gross Domestic Product Economic development Biological diversity Climate

United Nations Conventions on the Rights of the child			
Relevant data or information Positive and/or Prompts			
		negative impacts	(not exhaustive)
Relevant Article			Summary of conventions

	ur articles in the convention that are seen as special. They're known as the "General Principles" and they help to interpret all the other articles and play a role in realising all the rights in the Convention for all children. They are:
Article 2	The Convention applies to every child without discrimination, whatever their ethnicity, sex, religion, language, abilities or any other status, whatever they think or say, whatever their family background
Article 3	(best interests of the child) The best interests of the child must be a top priority in all decisions and actions that affect children.
Article 6	(life, survival and development) Every child has the right to life. Governments must do all they can to ensure that children survive and develop to their full potential
Article 12	2 (respect for the views of the child) Every child has the right to express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously. This right applies at all times, for example during immigration proceedings, housing decisions or the child's day-to-day home life

9. Are there any data or information gaps and if so what are they and how do you intend to address them?

None

Note: If it is not possible to obtain this information now, you should include this in your action plan in Step 6 so that this information is available for future IIAs.

10. How does your proposal ensure that you are working in line with the requirements of the Welsh Language Standards (Welsh Language Measure (Wales) 2011), to ensure the Welsh language is not treated less favourably than the English language, and that every opportunity is taken to promote the Welsh language (beyond providing services bilingually) and increase opportunities to use and learn the language in the community?

All literature / information will be provided through the medium of Welsh as well as English when required or requested

11. If this IIA is being updated from a previous version of a similar policy or practice, were the intended outcomes of the proposal last time achieved or were there other outcomes? (Please provide details, for example, was the impact confined to the people you initially thought would be affected, or were other people affected and if so, how?)

N/A

12. What is the cumulative impact of this proposal on different protected groups when considering other key decisions affecting these groups made by the organisation? (You may need to discuss this with your Chief Officer or Cabinet Member to consider more widely if this proposal will affect certain groups more adversely because of other decisions the organisation is making, e.g., financial impact/poverty, withdrawal of multiple services and whether this is disadvantaging the same groups, e.g., disabled people, older people, single parents (who are mainly women), etc)

This policy and specifications will be available to all required parties with the documentation and information in easy read format to their needs and requirements.

Therefore the overall impact will be positive.

13. How does this proposal meet with each of the 7 goals of the Well-being of Future Generations (Wales) Act 2015? For more information, please see: https://futuregenerations.wales/about-us/future-generations-act/

A Prosperous Wales:

The policy, through its emphasis on energy-efficient technologies, may contribute to economic prosperity by potentially reducing energy costs and stimulating economic activity in safer, well-lit public spaces.

A Resilient Wales: The policy's consideration of resilience in infrastructure design, maintenance, and community engagement aligns with the goal of building resilience within communities and supporting adaptability to changing conditions.

A Healthier Wales: Improved street lighting enhances safety, contributing to public health and well-being. Reduced light pollution also positively impacts sleep patterns, aligning with the goal of creating a healthier living environment.

A More Equal Wales: The policy aims to provide well-lit and safe public spaces for all residents, contributing to equality in access to essential services and promoting a sense of community inclusivity.

A Wales of Cohesive Communities: By promoting community engagement, aesthetic considerations, and safety in public spaces, the policy fosters a sense of community cohesion and contributes to the development of cohesive and vibrant communities. A Wales of Vibrant Culture and Thriving Welsh Language: The policy, through its commitment to preserving cultural and historical aspects in lighting design, supports the goal of maintaining vibrant local cultures and heritage.

A Globally Responsible Wales: Energy-efficient technologies and sustainable practices in the policy contribute to global responsibility by reducing energy consumption, lowering carbon emissions, and promoting environmentally conscious urban planning.

14. How does this proposal meet with the 5 ways of working of the Well-being of Future Generations (Wales) Act 2015?

Integration: The policy demonstrates integration by considering various aspects such as energy efficiency, safety, engagement, and environmental impact. By aligning these factors, the policy contributes to a holistic and integrated approach to a sustainable street lighting and electrical infrastructure.

Long-Term Thinking: The emphasis on energy-efficient technologies, smart controls, and resilient infrastructure design reflects a commitment to long-term thinking. By considering the longevity and adaptability of streetlighting solutions, the policy aims to provide lasting benefits for future generations.

Prevention: Through strategies to minimize light pollution, optimize energy use, and enhance safety, the policy aligns with the principle of prevention. This involves addressing potential issues before they escalate, contributing to a more sustainable and preventative approach to planning and designing and illuminated infrastructure.

Collaboration: The policy promotes collaboration by engaging with the community, considering diverse perspectives, and potentially collaborating with other local stakeholders. Collaboration is key to effective and inclusive decision-making in the development and implementation of the street lighting policy.

Involvement: Community involvement is a central theme in the policy, as seen in efforts to engage residents in the decision-making process, gather feedback, and consider the specific needs and preferences of the local community. This aligns with the principle of involvement, ensuring that the policy reflects the aspirations of those it directly affects.

15. Describe any intended negative impact identified and explain why you believe this is justified (for example, on the grounds of advancing equality of opportunity or fostering good relations between those who share a protected characteristic and those who do not or because of an objective justification¹ or positive action²)

N/A

Note1: Objective Justification - gives a defence for applying a policy, rule or practice that would otherwise be unlawful direct or indirect discrimination. To rely on the objective justification defence, the employer, service provider or other organisation must show that its policy or rule was for a good reason – that is 'a proportionate means of achieving a legitimate aim'. A **legitimate aim** is the reason behind the discrimination which must not be discriminatory in itself and must be a genuine or real reason, e.g., health, safety or welfare of individuals. If the aim is simply to reduce costs because it is cheaper to discriminate, this will not be legitimate. Consider if the importance of the aim outweighs any discriminatory effects of the unfavourable treatment and be sure that there are no alternative measures available that would meet the aim without too much difficulty (proportionate) and would avoid the discriminatory effect.

Note²: Positive Action - Where an employer takes specific steps to improve equality in the workplace to address any imbalance of opportunity, lessen a disadvantage or increase participation in a particular activity, for example, increasing the number of disabled people in senior roles where they are under-represented by targeting specific groups with job adverts or offering training to help create opportunities for certain groups. The public sector is expected to consider the use of positive action to help them comply with the Public Sector Equality Duty.

16. Could any of the negative impacts identified amount to unlawful discrimination but are perceived to be unavoidable (e.g., reduction in funding)?

Yes No Not Sure (*Please double click on the relevant box (X) and select 'checked' as appropriate)*

- 17. If you answered Yes or Not Sure to question 15, please state below, which protected group(s) this applies to and explain why (including likely impact or effects of this proposed change)
- 18. If you answered No to question 15, are there any barriers identified which amount to a differential impact for certain groups and what are they?

N/A

The Public Sector Equality Duty (PSED) requires all public authorities to consider the needs of protected characteristics when designing and delivering public services, including where this is done in partnership with other organisations or through procurement of services. The Welsh Language Standards also require all public authorities to consider the effects of any policy decision, or change in service delivery, on the Welsh language, which includes any work done in partnership or by third parties. We must also ensure we consider the Socio-economic Duty when planning major procurement and commissioning decisions to consider how such arrangements can reduce inequalities of outcome caused by socio-economic disadvantage.

When procuring works, goods or services from other organisations (on the basis of a relevant agreement), we must have due regard to whether it would be appropriate :

- for the award criteria for that contract to include considerations to help meet the General Duty (to eliminate discrimination, promote equality of opportunity and foster good relations);
- to stipulate conditions relating to the performance of the contract to help meet the three aims of the General Duty.

This only applies to contractual arrangements that are "relevant agreements" which means either the award of a 'public contract' or the conclusion of a 'framework agreement', both of which are regulated by the Public Sector Directive (Directive 2004/18/EC) which regulates the specified EU thresholds. Further information can be found <u>here</u>.

We must consider how such arrangements can improve equal opportunities and reduce inequalities of outcome due to protected characteristics and caused by socio-economic disadvantage, particularly on major procurement and commissioning decisions. The PSED applies to the work that private sector organisations undertake when delivering a public function on our behalf. We therefore need to ensure that those organisations exercise those functions by ensuring our procurement and monitoring of those services complies with the General Duty under Section 149 of the Equality Act 2010. In the same way, the Welsh Language Standards applies to any work undertaken on behalf of, and in the name of, public bodies that are themselves subject to the Standards, and so consideration should be given to how these requirements are monitored and communicated through the procurement documents. The Socio Economic Duty does not pass to a third party through procurement, commissioning or outsourcing. Therefore when we work in partnership with bodies not covered by the Socio Economic Duty, the duty only applies to us as the relevant public body.

19 Is this policy or practice to be carried out wholly or partly by contractors or in partnership with another organisation(s)?

Yes 🗌 No 🛛 (Please double click on the relevant box (X) and select 'checked' as appropriate)

If No, please proceed to Step 4

20. If Yes, what steps will you take to comply with the General Equality Duty, Human Rights and Welsh Language Legislation and the Socio-Economic Duty in regard to procurement and/or partnerships? Think about :

Procurement

- Setting out clear equality expectations in Tendering and Specification documentation, showing how promotion of equality may be built into individual procurement projects
- On what you based your decisions in the award process, including consideration of ethnical employment and supply chain code of practice
- Ensure that contract clauses cover the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011 and socio-economic requirements as well as Welsh Language Duties (remember that any duties from the Welsh Language Measure 2011 and Welsh Language Standards are also applicable to services provided on your behalf under contract by external bodies).
- Performance and Monitoring measures are included to monitor compliance, managing and enforcing contracts

Partnerships

Be clear about who is responsible for :

- Equality Monitoring relevant data
- Equality Impact Assessments
- Delivering the actions from the IIA
- Ensuring that equality, human rights and Welsh Language legislation is complied with by all partners
- Demonstrating due regard to the Public Sector Equality Duty and the Socio-Economic duty

STEP 4 - Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice

21. When considering proportionality, does the policy or practice have a significantly positive or negative impact or create inequalities of outcome resulting from socio-economic disadvantage?

(Please give brief details)

Significantly positive impact	Significantly negative impact
N/A	N/A

22. It is important that you record the mitigating actions you will take in developing your final policy/practice draft. Record here what measures or changes you will introduce to the policy or practice in the final draft which could reduce or remove any unlawful or negative impact or disadvantage and/or improve equality of opportunity/introduce positive change; or reduce inequalities of outcome resulting from socio-economic disadvantage? (This could also inform the Action Plan in Q30)

Unlawful or Negative Impact Identified	Mitigation / Positive Actions Taken in the Policy/Practice	Completed (✓)	

23. Will these measures remove any unlawful impact or disadvantage?

No	(Please double click on the relevant box (X) and select 'checked' as	appropriate)

24. If No, what actions could you take to achieve the same goal by an alternative means?

N/A

Yes

at measures or changes in the following important legislative areas have you included to strengthen or change the policy/practice:

- a) to foster good relations and advance equality of opportunity as covered by the General Duty in the Equality Act 2010;
- b) to reduce inequalities of outcome as a result of socio-economic disadvantage;
- c) to increase opportunities to use the Welsh language and in treating the Welsh language no less favourably than the English language as set out in the Welsh Language (Wales) Measure 2011 and reduce or prevent any adverse effects that the policy/practice may have on the Welsh language?

a) Fostering Good Relations and Advancing Equality of Opportunity:

The policy incorporates measures to ensure that street lighting practices foster good relations and advance equality of opportunity. This includes the consideration of lighting designs that are inclusive and accessible to all members of the community, irrespective of age, gender, disability, or other protected characteristics. Community engagement strategies are employed to gather diverse perspectives and ensure that the policy is sensitive to the needs and preferences of different groups.

b) Reducing Inequalities of Outcome Due to Socio-Economic Disadvantage:

The policy addresses socio-economic disparities by promoting energy efficiency, which can result in cost savings for residents and the local authority. By strategically placing streetlights and optimizing lighting levels, the policy aims to create safer environments for all, reducing inequalities in safety and security that may be more pronounced in economically disadvantaged areas. c) Increasing Opportunities to Use the Welsh Language and Treating Welsh Language Equitably: Wh

25.

The policy aligns with the Welsh Language (Wales) Measure 2011 by promoting bilingual communication in public spaces, including streetlighting information and signage. Efforts are made to increase opportunities to use the Welsh language, and the policy ensures equitable treatment of the Welsh language, avoiding any less favourable treatment compared to English. Community feedback and engagement processes are conducted in both languages to facilitate inclusive participation.

These measures collectively strengthen the policy's adherence to legislative requirements, promoting equality, addressing socioeconomic disparities, and supporting the use of the Welsh language in alignment with relevant legislation.

26. Do you have enough information to make an informed judgement?

- Yes \square No \square (Please double click on the relevant box (X) and select 'checked' as appropriate)
- 27. If you answered Yes, please justify:
- 28. If you answered No, what information do you require and what do you need to do to make a decision? (Note: Should data collection be included in the action plan (Step 6)?)

[You may need to stop here until you have obtained the additional information]

STEP 5 - Decision to Proceed

29. Using the information you have gathered in Steps 1 – 4 above, please state on the table below whether you are able to proceed with the policy or practice and if so, on what basis?

(Please double click on the relevant box (X) and select 'checked' as appropriate)

Decision

Yes	Continue with policy or practice in its current form
🗌 Yes	Continue with policy or practice but with amendments for improvement or to remove any areas of adverse impact identified in Step 4
🗌 Yes	Continue with the plan as any detrimental impact can be justified
No No	Do not continue with this policy or practice as it is not possible to address the adverse impact. Consider alternative ways of addressing the issues.

30. Are there any final recommendations in relation to the outcome of this Equality Impact Assessment?

STEP 6 - Actions and Arrangements for Monitoring Outcomes and Reviewing Data

The IIA process is an ongoing one that doesn't end when the policy/practice and IIA is agreed and implemented. There is a specific legal duty to monitor the impact of policies/practices on equality on an ongoing basis to identify if the outcomes have changed since you introduced or amended this new policy or practice. If you do not hold relevant data, then you should be taking steps to rectify this in your action plan. To review the EHRC guidance on data collection you can review their <u>Measurement Framework</u>.

31. Please outline below any <u>actions</u> identified in Steps 1-5 or any additional data collection that will help you monitor your policy/practice once implemented:

Action	Dates	Timeframe	Lead Responsibility	Add to Service Plan (✓)
KPI's for Street Lighting Standards (Internal)		Monthly	Darell Jones	
KPI's for Traffic Signals Repairs and Standards		Quarterly	Darell Jones	

32. Please outline below what arrangements you will make to <u>monitor and review</u> the ongoing impact of this policy or practice including timescales for when it should be formally reviewed:

Monitoring and Review arrangements	Timeframe &	Lead	Add to Service Plan
(including where outcomes will be recorded)	Frequency	Responsibility	(✓)

Monitor and Review of legislation amendments	As required	Darell Jones	

STEP 7 - **Publishing the Integrated Impact Assessment** Please arrange for this completed IIA to be agreed by your Chief Officer and arrange for translation and publishing with a copy sent to Stephanie Aldridge: stephanie.aldridge@flintshire.gov.uk.