

F1457 A2 Customer Equality Impact Assessment (EQIA) Form

The Equality Impact Assessment (EQIA) is a means by which we can demonstrate how we have considered inclusion and put people at the heart of the decisions and changes we make. It is a tool to explore the potential for a service, project, programme, or business plan to have an impact on a particular protected characteristic, inclusion groups, or community. This includes the impact on one or more of these groups:

- Protected characteristic groups (as outlined in the Equality Act 2010)
- Disadvantaged or marginalised groups or communities
- Deprivation and socio-economic disadvantage within local communities

Please note:

To comply with our agreed policy on completing Equality Impact Assessment (EQIA) and meet our requirements under legislation, all new strategies, policies, business plans, change programmes or projects must be impact assessed before being introduced. Within this document, you will need to provide evidence to demonstrate:

- Consideration of the impact of your initiative for each protected characteristic and other disadvantaged groups and communities
- Assessment of the impact you have identified and a clear action plan to mitigate the issues and concerns which arise from this.

The steps for completing EQIA are:

- Introduction of aims/objectives/focus
- Gather evidence in relation to all relevant protected characteristics and inclusion groups
- Engagement and consultations – consult and engage with relevant stakeholders/inclusion groups/communities and seek feedback
- Assess or identify potential impacts
- Act on the results including planning actions to mitigate potential negative impact
- Monitoring and evaluation
- Make the right decision based on the evidence and findings from the assessment
- Sign-off

Draft or completed customer EQIA should be submitted to Customer EQIA [inbox](#) and a superuser or member of the customer D&I team will be allocated to review the document. Please ensure you have read the customer EQIA guidance before using this form.

To be used in conjunction with: [G1060](#)

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1. Key information and clarifying aims

Title of strategy, service, business plan, programme, or project	Reverting to 'self-detrainment' for reversing trains on the Bakerloo, Central, Circle & Hammersmith, District, Jubilee, Metropolitan, Victoria and Waterloo & City Lines.			Unique ID No. <i>(To be assigned by the D&I team)</i>	D&IC/22/444
Team/Department/ Directorate	Customer Operations				
EQIA author	Joe Brown				
Senior accountable person	Daniel Howarth				
Date EQIA started	21/11/2022	Date EQIA completed			
Project Stage	Part-delivered (Waterloo & City Line launched 1 July 2021) – remaining lines awaiting local consultation.				
What is the focus of this EQIA? <i>(Please tick which is appropriate)</i>	Service	Project	Programme	Strategy or business plan	Others <i>(please state below)</i>
				X	
Who would benefit or be impacted by your strategy, service, business plan, programme, or project <i>(Please provide details of below)</i>					
Customer	Customers of the lines in scope would be impacted: <ul style="list-style-type: none"> Increased frequency of customers inconvenienced by being 'overcarried' into sidings on reversing trains Improved service reliability through reduced platform dwells at reversing locations Redeployment of dedicated 'detrainment staff' to more visible and customer-facing roles 				
Employee <i>(for workforce or employee <u>only</u> impact assessment, please email the D&I workforce team at EQIA@tfl.gov.uk)</i>	Employees of the lines in scope would be impacted: <ul style="list-style-type: none"> Decreased frequency of employees (station staff) interacting with customers unwilling / unable to alight trains Increased frequency of employees (Train Operators) coming into contact with overcarried customers on trains 				

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<p>Provide background information and outline the aims/objectives/scope of the strategy, service, business plan, programme, or project</p>	<p>1. Introduction</p> <p>1.1 Following an incident in 2000, trains which terminate then reverse back into service via a siding must be checked by staff at the platform immediately before beginning such a move. This is to confirm they are empty and thereby mitigate risks arising from passengers remaining on board, known as ‘over-carrying’.</p> <p>1.2 The most significant risk of passengers attempting self-detrainment via carriage interconnecting doors has now been mitigated by engineering solutions on most train fleets. Although an engineering solution is higher in the hierarchy of controls than human intervention, the checking approach has not altered.</p> <p>1.3 A new station staffing model was introduced in Spring 2016 but these duties were not in scope for change. However, following recent reviews and feedback on the impact of this model, priorities for all station staff deployment are being reassessed. This has triggered analysis of this process and the proposal presented here to discontinue its use in some locations in order to better deploy the staff involved.</p> <p>1.4 This proposal was approved by DRACCT in 2010; it was acceptable to the Office of Road and Rail (ORR) and implemented on the Bakerloo line in 2011. However, Trade Unions (TUs) raised concerns in 2012 and a compromise solution including a degree of checking was then reintroduced. At the same time, discontinuation of checks on other Lines was put on hold.</p> <p>1.5 This pause was released with effect from 1st July 2021 at Waterloo (Waterloo & City Line) and the staff redeployed from the platforms concerned. A continuation of this phased discontinuation of checks is currently underway.</p> <p>1.6 The benefits of this proposal would be: redeployment of station staff to more valuable activities such as reducing lone working, staffing control rooms, achieving greater visibility to customers and to enable improved staff rosters, greater service reliability and removal of a constraint to increasing service capacity.</p> <p>1.7 CAP 05358 provided an update on the original proposal, a refreshed implementation plan and sought confirmation of DRACCT support. It should be noted that checks of trains which terminate and stable in depots and sidings are not in scope since different risks arise from this procedure.</p> <p>2. Background</p>
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2.1 Prior to 2000, risks arising from over-carrying passengers into sidings on reversing trains were considered to be 'as low as reasonably practicable' (ALARP) on the basis that trains would shortly re-enter service at the same location and Train Operators, when changing ends, could offer reassurance and request prompt departure, if needed. This assessment changed following a fatality at Liverpool Street station in February 2000 when a passenger attempted to reach the platform via interconnecting car doors as a reversing train was moving into the siding.

2.2 A Prohibition Notice concerning this procedure was received and, as no engineering solution was available at the time to mitigate the risk of self-detrainment in these circumstances, we complied by requiring that each reversing train is checked and any remaining passengers detrained before moving.

2.3 Since then, this requirement has been factored into timetables and station staffing plans. Desired service headways determine the time allowed to complete detrainment and therefore the staff needed as follows:

Time allowed (minutes) / Staff needed to check train
4mins = Train Operator only
2mins = Train Operator and 1 x station staff to assist
1min = 2 x station staff (Train Operator to remain in cab)

2.4 Rule Book 8 (section 3.3) Managing the Platform Train Interface requires Train Operators to announce that their service is terminating and repeat this twice more. The train is then checked to ensure that all passengers are detrained before individual car doors are closed by means of porter buttons. The train may then move.

2.5 A number of disbenefits arise from the procedure:-Lost Customer Hours (LCH) can occur if the time allowed is not achieved -it acts as a constraint on increasing service volumes-dedicated station staff are deployed at a number of locations where reversing is scheduled regularly, however at other locations, it interrupts other duties-although these station staff provide a customer service role too, it ties them to specific times and locations at platforms, usually throughout the traffic day-staff experience a conflict between being active to help move trains promptly and taking time to assist detrained customers. Also, even though all trains are checked, passengers are still occasionally over-carried.



2.6 An engineering solution to the risk of self-detrainment was incorporated into the design of Victoria Line 09 tube stock through introduction of Inner Inter-Car Barriers (IICBs). These protrude from both ends of each car adjacent to the inter-connecting doors. They are robust, not readily removable, and provide a significant deterrent against leaving a train via this route. The walk-through design of the S Stock train eliminates this risk entirely.

2.7 In June 2010, a CAP 'Discontinuation of car-by-car detrainment of trains reversing in service for Victoria 09 and SSR S Stock' was approved by DRACCT. In October 2010 the ORR raised no objections to this proposal on the basis that the engineering solutions were in place.

2.8 Business cases to retrofit IICBs to other rolling stock were assessed and, on the Lines where reduction of the above disbenefits were deemed worthwhile-the Bakerloo, Central, Waterloo & City, and Jubilee Lines -DRACCT approved similar CAPs. There was no business case for Northern or Piccadilly Line stock to be retrofitted, mainly owing to the relatively infrequent use of reversing via a siding on these Lines.

2.9 Checks ceased on reversing Bakerloo Line trains at Queen's Park, Stonebridge Park and Harrow & Wealdstone stations in October 2011, following TU consultation and the installation of IICBs. A revised procedure included Train Operators turning saloon lights off and on and making a series of announcements: on approach to the stations, on arrival, and before changing ends once in the siding.

2.10 In early 2012, consultation with TUs over roll out to the Central and Jubilee Lines triggered concerns. These included the removed station roles and risks of assault from over-carried passengers if any were to be encountered as Train Operators changed ends and/or when returned to platforms having been delayed, and also the customer impacts.

2.11 A number of Bakerloo Line passengers had been over-carried following discontinuation of checks. As familiarity grew with the new arrangement, this reduced at Stonebridge Park and Harrow & Wealdstone, however at Queen's Park the volume remained relatively stable at around 225 per period (compared to a baseline of around 38 incidents per year). No injuries were reported.

2.12 Around 70% of over-carries were of an individual passenger, whilst 27% involved between 2 and 5 people. Over-carries of 10 or more also occasionally occurred with explanations such as the passengers



concerned not hearing or understanding announcements. It should be noted that passenger loadings are higher at Queen's Park as it is further from the Line's terminus, and many trains reverse there.

2.13 Whilst inconvenient for those passengers affected, there was no evidence of any corresponding rise in the number of assaults on Train Operators, which remained very low. In the 16 periods that the revised procedure was implemented on the Bakerloo line, assaults on station staff fell to just a single incident. By comparison, in the 16 periods following the re-introduction of checks, there were 7 assaults to station staff at these locations.

2.14 In July 2012, a 12-year-old passenger who was over-carried at Queen's Park, climbed over the IICBs, and entered the track area. A Formal Investigation resulted in an enhancement to the engineering solution through another barrier above both end doors to further mitigate this risk. Known as Canopy Barriers, these were added to all the relevant rolling stocks.

2.15 In light of this incident and further controls, DRACCT and the ORR reviewed the procedure and again raised no objections.

2.16 However, the TUs entered into dispute on the Bakerloo line and took industrial action which involved Train Operators checking their trains were empty. This led to service delays and so a temporary procedure was introduced with station staff again involved.

2.17 Following resolution discussions, agreement was reached in March 2013 for station staff to continue checking trains through a revised procedure: after Train Operators had made announcements and closed train doors, a visual check is performed and any passengers present are assisted to leave through the doors which are then re-shut using butterfly cocks. Trains move to a siding once station staff confirm they are empty by means of a hand signal.

2.18 Plans for other Lines to cease these checks were suspended at this point.

3.Current situation

3.1 A new model for station staffing was introduced in Spring 2016, although the role of staff checking reversing trains was not in scope and therefore this continued. The impacts of this model were then



	<p>reviewed: externally by London Travelwatch, internally through a management review plus staff and TU feedback, resulting in more than 300 new posts being added.</p> <p>3.2 This increase in station staff means detailed deployment plans were reviewed to maximise the benefit, hence the current process used to check reversing trains has been reassessed. Following consultation with management stakeholders and confirmation that the engineering solution is still robust, our conclusion is that residual risks arising from over-carrying passengers are ALARP and outweighed by tackling the disbenefits listed above, primarily by redeploying station staff.</p> <p>3.3 Consultation has now taken place with our TUs through:</p> <ul style="list-style-type: none">• the Trains Health and Safety Council, to consider the impacts on Train Operators• the Stations Functional Council, linked to the current review assessing staffing and activities following implementation of the 'Customer Service Review' (CSR), which involves relevant staff representatives, to consider the impacts on station staff <p>3.4 Responses have been given to concerns over the principle of this change, and local consultation will now follow to discuss detailed implementation at the locations in scope. Communications to the affected staff and customers will then be delivered, documents updated and training amended.</p> <p>3.5 At this stage, it is proposed that checking trains for passengers prior to reversing via sidings will be withdrawn in phases. To prevent confusion, the procedure would change at all locations on each Line in scope at once. The complete removal of checks on all remaining Lines fitted with IICBs and Canopy Barriers is planned to be rolled out over 6-8 months. This plan will be subject to consultation and reviews of any issues throughout implementation.</p> <p>3.6 Subject to consultation, roll out will be sequenced as indicated in the table below. Timescales will be determined following detailed consultation.</p>
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Order	Line / lead	Location
1	Bakerloo	Harrow & Wealdstone
	Tom Naughton	Queens Park
		Stonebridge Park
2	Central	Debden
	Lawrence Boamong	Liverpool Street
		Marble Arch
		Newbury Park
		Northolt
		White City
3	District, C&H	Barking
	Joey Gungadin	Parsons Green
		West Ham
4	Jubilee	Green Park
	Cheryl Alexander	Wembley Park
		West Hampstead
5	Metropolitan	Amersham
	Harry Tella	Harrow-on-the-Hill
6	Victoria	Seven Sisters
	Sara Henderson	Victoria

3.7 The following should be noted:

- When a train is withdrawn from service for any reason, for example to stable or because of defects, checks will continue. This is to mitigate the risk of passengers being over-carried into locations from which trains will not be re-entering service after a short period.
- Timetable changes since 2013 mean there is now no scheduled reversing via a siding on the Victoria Line. The current Northern and Piccadilly Line timetables do include reversing via a siding, however the rolling stock is not equipped with IICBs and Canopy Barriers and no business case has been made for their installation.
- Guidance for Service Control staff will include considering the desirability of checking reversing trains to ensure customer service under circumstances such as:



- the subsequent return of the train concerned to the platform could be delayed, for instance in a failure
- the decision to reverse the train is made not long before it reaches the platform concerned
- there are known to be VIPs or other customers on board who may need assistance
- passenger loadings are affected by a nearby event

3.8 On 25th May 2021 local risk assessment took place at Waterloo on the Waterloo & City Line, resulting in withdrawal of manual detrainment being introduced on 1st July 2021. In the first eight months there were 27 recorded overcarry incidents totalling 33 customers (until 9 March 2022), but no recorded injuries or assaults to colleagues or customers in consequence.

4. Significant risks

4.1 The trains workplace risk assessments for 'bringing a train into/taking a train out of service' and the customer risk assessment for 'train journey' have been reviewed with management subject matter leaders. It is not necessary to review the stations workplace and customer risk assessments as there will be no difference to the risks for passengers on stations, and staff assisted detrainment will still be carried out when trains are taken out of service.

4.2 As detailed in section 2, various fleets have now been modified with IICBs and Canopy Barriers. The design consists of solid (Victoria and Bakerloo) or staggered segments of barrier (Jubilee, Central and Waterloo & City) fitted alternately on the body of the two facing cars. With the Canopy Barriers now installed, the likelihood of self-detrainment is considered to be low. As the S Stock has through gangways from car to car, there is no exit point between carriages for a passenger who is over-carried.

4.3 The generic risks associated with this proposal are outlined further below.



No.	Hazard	Mitigation	Risk
1	Increase in number of passengers over-carried into sidings when reversing moves are carried out, who may seek a means to self-detrain.	<ul style="list-style-type: none"> • Platform indicator boards • Train destination information • Stations Public Address (PA) • Train Operator flashing saloon lights • Regular automated Train PA • Train Operator announcing that trains will be terminating (x3) • Passenger emergency alarm (PEA) • Train Operator providing reassurance via PA/talkback facility or when changing ends • Immediately changing ends • IICBs/Canopy Barriers • Customer communication, including campaigns 	<p><i>Low</i> - Even with detrainment staff in place over-carries occur</p> <p>If over-carries increase, the risks of passengers self-detaining via the interconnecting doors has been significantly reduced.</p>



	2	Staff assault	<ul style="list-style-type: none"> • Connect radio including Personal Incident Alarm • Train Operator reassuring passengers • Communication with Service Control after discovery of over-carried customer • Passenger emergency alarm (PEA) • Train Operator providing reassurance via PA/talkback facility or when changing ends • Immediately changing ends 	<p><i>Low</i> - Staff assaults are more likely to occur when passengers are being detrained rather than when a Train Operator is changing ends. Therefore the likelihood of assaults to staff undertaking detrainments for reversing moves will reduce as they will no longer have to undertake this activity.</p> <p>NB Train Operators are required to walk through their trains when they are in service to carry out other activities, for example, if a train develops a fault, or to change ends in a failure. Recorded assaults are low</p>
	3	Over-carriage of vulnerable passengers - visually impaired, hearing impaired, mobility impaired, those with learning difficulties, non-English speaking passengers, passengers under the influence of alcohol and those using personal listening devices etc, who may become agitated or attempt to self detain.	<ul style="list-style-type: none"> • Platform indicator boards • Train destination information • Stations PAs • Train Operator flashing saloon lights • Regular automated Train PAs • Train Operator announcing that trains will be terminating (x3) • Passenger emergency alarm (PEA). • Train Operator providing reassurance via PA/talkback facility or when changing ends • Immediately changing ends • IICBs/Canopy Barriers 	<p><i>Low</i> - Even with detrainment staff in place over-carries occur</p> <p>If over-carries increase, the risks of passengers self-detraining via the interconnecting doors has been significantly reduced.</p>



	4	Passengers attempt to self-detrain by climbing over/through the barriers when taken into sidings when reversing moves carried out	<ul style="list-style-type: none"> • IICBs • Canopy Barriers • Train Operator immediately changing ends • Additional PA when leaving cab • Train Operator reassurance 	Low – Technical modifications to the trains following a passenger self-detaining have reduced this risk.
	5	Passengers try to self detrain at the extremities of the train	<ul style="list-style-type: none"> • 'J door' protected by break-glass lock and alarm • Train Operator changing ends immediately • PEA • Additional PA when leaving cab • Train Operator reassurance 	Low
	6	Passenger become crushed / trapped when using interconnecting doors while trains reverse through a curve	<ul style="list-style-type: none"> • Existing warning notices on interconnecting doors • PEA • Audio (PA) announcements 	Low - This risk remains low with less potential for serious injury.
	7	Passengers passing through interconnecting doors fall between a car end and barriers onto the track.	<ul style="list-style-type: none"> • Existing warning notices on interconnecting doors • Train Operator changing ends immediately • PEA • IICBs 	Low - Risk to passengers has been significantly reduced by the installation of IICBs.
	8	Train becomes defective or is delayed departing siding with passengers on board, which may lead to passengers becoming impatient and trying to self detrain, or starting to walk through the interconnecting doors	<ul style="list-style-type: none"> • Train Operator immediately changing ends • Additional PA when leaving cab • Train Operator reassurance • Communication with Service Controller if any passengers remain on board • Existing Rule Book procedures for over-carries 	<p>Low – The likelihood of the train becoming defective is no greater than elsewhere</p> <p>Once Service Control are made aware of passengers being on board the train, suitable arrangements would be implemented.</p>



2. The Evidence Base

Consider evidence in relation to all relevant protected characteristics and inclusion group listed in the table below. Please note that change always disproportionately impacts all protected characteristics, so there should be no blank boxes. Consideration should be given not just to the proposal impact but how you intend to communicate and engage on the proposed change.

Protected Characteristic and inclusion group	Data and evidence to support your assessment <i>(Record here the data you have gathered about the diversity of the people potentially impacted by this work. Please include any research on the issues affecting inclusion in relation to your work).</i> Source: Travel in London: Understanding our diverse communities 2019 . The report utilises the London Travel Demand Survey (LTDS) demographic data. The information included below is London Underground specific. A reliance on pre-pandemic data is a limitation of the data.
Age	<p><i>Percentage of Londoners who travel by Tube at least once a week = Aged 24 and under (32%), 65+ (28%)</i> 65+: more likely to experience visual, hearing, or mobility impairment than younger people (see 'disability' below for impact) 65+ disproportionately likely to be overcarried</p>
Disability <i>(please consider all forms of disabilities)</i>	<p><i>Percentage of Londoners who travel by Tube at least once a week = Disabled (21%), non-disabled (43%)</i> <u>Visually impaired</u>: less able to see train destination (platform indicator, on front of train, in-car displays), or flashing saloon lights <u>Hearing impaired</u>: less able to hear public address announcements (on platforms, on trains) <u>Mobility impaired</u>: less able to alight at terminus before the train doors are closed <u>Learning disability, dementia, etc</u>: less able to understand a train reversing before end of the line and more likely to be distressed by being overcarried Disproportionately likely to be overcarried / impacted by overcarry</p>

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Sex (male, female, non-binary and other identities)	Percentage of Londoners who travel by Tube at least once a week = Male (43%) Female (38%) No impact anticipated
Gender reassignment	No data No impact anticipated
Marriage/civil partnership	No data No impact anticipated
Pregnancy/maternity	No data Pregnancy: less able to alight at terminus before the train doors are closed during later stages Maternity: less able to alight at terminus before the train doors are closed (e.g., encumbered by buggy) Disproportionately likely to be overcarried
Race	Percentage of Londoners who travel by Tube at least once a week = BAME (37%), White (43%) 22% of Londoners have a language other than English as their first language while 4% have difficulty speaking English. While not directly linked to race, there is presumed to be a correlation between individuals with difficulty speaking English / English as a second language and being of a BAME background. These individuals are presumed to be less likely to understand train destination indications and public address announcements. Disproportionately likely to be overcarried
Religion or belief	London population (2011) = 48% Christian, 21% no religion, 12% Muslim, 8% undeclared, 5% Hindu, 2% Judaism, 2% Sikh, 1% Buddhist, 1% other No impact anticipated
Sexual orientation	London population (2011) = Heterosexual (89%), LGB (2.6%) No impact anticipated
Disadvantaged, inclusion groups and communities e.g., carers, refugees, low	28% of Londoners can be classified as having a lower annual household income (below £20,000). No data for other disadvantaged, inclusion groups and communities Refugees are presumed to be more likely to have difficulty speaking English / English as a second language (see Race above for rationale / impact). Disproportionately likely to be overcarried



income, homeless people etc.	
Deprivation and socio-economic disadvantage of local communities e.g., people with lack of access to housing, education, social resources, geographic location, and income	<i>No data</i> No impact anticipated



3. Engagement and consultation

Outline how engagement and consultation with inclusion groups, people who share a protected characteristic, and other project teams have informed your work

	Yes	No	Don't Know	Comments
Has there been any engagement or consultation activity relating to this strategy, service, business plan, programme, or project?	X			This change has been extensively consulted internally through trade union machinery, and has been approved at director level (DRACCT)
List the relevant stakeholders and inclusion groups you have consulted/engaged or intend to consult/engage with below. Please include any relevant consultation or engagement undertaken prior to completing this EQIA which relates each protected characteristic and inclusion group.				
Stakeholders and inclusion groups consulted/engaged with	Date		Feedback comments / issues raised	
Trains 'Tier 2' Health & Safety	18 January 2022		The Trains Tier 2 Health & Safety reps raised a concern about the safety of women Train Operators when they encounter 'overcarried' customers on their trains (see below). After establishing there was no data to support the perception and the consultation on 14 February detailed below, a response was provided to the reps to this effect.	
Women's safety task & finish group (Georgina Carey) and Women's staff network group (Hayley Magorian)	14 February 2022		With reference to perceived risks to women Train Operators from overcarried customers. Georgina's and Hayley's advice was that as there is no evidence to support women colleagues being disproportionately at risk, the existing workplace risk assessments are sufficient.	
CISE (Helen Dimond)	8 March 2022		I suggested a card to be issued to Train Operators with a reassurance message in several common London languages other than English (stating that the train would	

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	Yes	No	Don't Know	Comments
				return to the station imminently). Helen queried whether there was any data to support the assumption that people who speak English as a second language / have difficulty speaking English would be more likely to be overcarried (there is none). Without data to support this being a significant factor or a card being an effective mitigation, or data to inform which languages to include, CISE do not have the resources to progress this idea.
Trains 'Tier 2a' Health & Safety		23 March 2022		Following the 18 January 2022 Tier 2 meeting and response, the trade unions referred to Director's review (Tier 2a) on 23 March – for completeness, the concern about the impact upon women Train Operators was not raised again at this forum and one of the two trade unions had explicitly stated that it was not a concern for their members.
	Yes	No	Don't Know	Comments (state clearly what this engagement or consultation will be and how it will be organised)
Does there need to be any further engagement or consultation? If yes, please add this as an action to the action planning section below. Please note that in some circumstances your work may require formal consultation			X	Please guide whether you'd suggest I consult with IDAG / Independent Disability Advisory Group It might be useful to consult IDAG since Visually impaired, hearing impaired, Mobility impaired, and people with learning disabilities are disproportionately likely to be overcarried / impacted by overcarry. My colleague Amy Edgar (AmyEdgar@tfl.gov.uk) will be more than happy to help facilitate a meeting with IDAG.



4. **Impact assessment – Protected characteristics and inclusion groups**

Given the evidence listed in section 2 and 3, consider and describe the potential impacts this work could have on people with protected characteristics and other inclusion groups.

	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
Race and ethnicity		X			X		<p>It is anticipated that customers of a BAME background would disproportionately be likely to be overcarried into sidings and inconvenienced due to a presumed correlation between individuals speaking English as a second language or having difficulty speaking English and being of a BAME background. Customers rely on reading visual cues such as destination displays and understanding public address announcements to alight from the train.</p> <p>Mitigation: flashing of train saloon lights on and off is an additional cue to customers to alight that is not dependent on English comprehension.</p> <p>Mitigation: at least one minute of 'dwell' time is timetabled, allowing longer for customers to alight.</p> <p>Mitigation: any trains which reverse short of the end of the line with little notice (i.e., change of destination) would still be checked as at present (see 3.7 in section 1 above)</p> <p>Mitigation: the Train Operator is to engage with overcarried customers while they 'change ends'</p>



	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							within minutes of arrival at the siding, providing reassurance.
Sex (male, female, non-binary and other identities)		X				X	N/A
Sex (male, female, non-binary and other identities)	X					X	Trains 'Tier 2' Health & Safety trade union reps raised a concern about the safety of women Train Operators when engaging with overcarried customers on their trains. There is no data to support that women Train Operators are more at risk of assault than men, and after consultation with the 'Women's safety task and finish group' and the Women's staff network group, it was concluded that the existing workplace risk assessments suffice for all gender identities.
Gender reassignment		x				X	N/A
Age		X				X	It is anticipated that customers who are 65+ would disproportionately be likely to be overcarried into sidings and inconvenienced because they may be slower to alight from train as compared to younger customers. Customers who are slower to alight would be more likely to be 'overcarried'. Mitigation: at least one minute of 'dwell' time is timetabled, allowing longer for customers to alight. Mitigation: the Train Operator is to engage with overcarried customers while they 'change ends'

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	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							within minutes of arrival at the siding, providing reassurance and being alert to any customers who appear vulnerable or who may have medical issues.
Religion and belief		X				X	N/A
Disability (please consider all forms of disabilities)		X			X		<p>It is anticipated that customers with disabilities would disproportionately be likely to be overcarried into sidings and inconvenienced due to a higher likelihood of experiencing visual, hearing, mobility, or cognitive impairment than customers without disabilities. Customers rely on reading visual cues such as destination displays and understanding public address announcements in order to alight from the train, and customers who are slower to alight would be more likely to be 'overcarried'. The impact upon an individual who has been 'overcarried' could be accentuated by a disability (e.g. greater distress).</p> <p>Mitigation: at least one minute of 'dwell' time is timetabled, allowing longer for customers to alight.</p> <p>Mitigation: any trains which reverse short of the end of the line with little notice (i.e. change of destination) would still be checked as at present (see 3.7 in section 1 above).</p> <p>Mitigation: flashing saloon lights at the terminus and written cues (train destination displays on</p>

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	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							<p>the front of the train, in car, and on platforms) convey information to hearing impaired people. <u>Mitigation:</u> public address on train and in stations convey information to visually impaired people. <u>Mitigation:</u> any trains known to have customers who need additional assistance (e.g. VIPs, MIPs) would still be checked as at present (see 3.7 in section 1 above). <u>Mitigation:</u> per Rule Book 11 section 5.2, the Train Operator is always made aware of a VIP or MIP being placed on their train, and their destination. <u>Mitigation:</u> customers who need additional assistance can utilise the 'TUAG' (turn up and go) service to ensure staff are in position to meet them at their destination. <u>Mitigation:</u> the Train Operator is to engage with overcarried customers while they 'change ends' within minutes of arrival at the siding, providing reassurance and being alert to any customers who appear vulnerable or who may have medical issues.</p>
Sexual orientation		X				X	N/A



	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
Marriage or civil partnership		X				X	N/A
Pregnancy and maternity		X			X		It is anticipated that customers who are pregnant or with young children would disproportionately be likely to be overcarried into sidings and inconvenienced due to being slower to alight than customers who are not pregnant or with young children. Mitigation: at least one minute of 'dwell' time is timetabled, allowing longer for customers to alight. Additionally, station staffs can be deployed to assist pregnant customers encumbered by buggy alight from the train.
Disadvantaged, inclusion groups and communities <i>e.g., carers, refugees, low income, homeless people etc</i>		X			X		It is anticipated that customers with refugee status would disproportionately be likely to be overcarried into sidings and inconvenienced due to a presumed correlation between individuals speaking English as a second language or having difficulty speaking English and having refugee status. Customers rely on reading visual cues such as destination displays and understanding public address announcements to alight from the train. Mitigation: flashing of train saloon lights on and off is an additional cue to customers to alight that is not dependent on English comprehension.



	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward (please include actions to mitigate the potential negative impact for this protected characteristic)
							<p>Mitigation: at least one minute of 'dwell' time is timetabled, allowing longer for customers to alight.</p> <p>Mitigation: the Train Operator is to engage with overcarried customers while they 'change ends' within minutes of arrival at the siding, providing reassurance.</p>
<p>Deprivation and socio-economic disadvantage of local communities e.g., people with lack of access to housing, education, social resources, geographic location, and income</p>		X				X	N/A



5. Action planning

List all planned actions - actions which could help mitigate any potential negative impacts. Additionally, please remember to include in your plan any 'positive action'.

	Actions	Owner	Deadline
1	Flashing of train saloon lights on and off twice at terminus to be included in Train Operator instructions.	Rule Book team (SHE) Joe Brown	Already captured in procedure (Line Supplements to Rule Book), to be briefed to Train Operators by 8 January 2023 (Bakerloo Line)
2	Making three public address announcements at terminus to be included in Train Operator instructions.	Rule Book team (SHE) Joe Brown	Already captured in procedure (Line Supplements to Rule Book), to be briefed to Train Operators by 8 January 2023 (Bakerloo Line)
3	Minimum one minute dwell time to be timetabled at reversing locations.	Timetables (Planning)	Already allocated in timetables.
4	Checking of trains to remain where there is short notice change of destination to a reversing point: communicate this to Service Control via briefing.	Joe Brown	8 January 2023 (Bakerloo Line)
5	Checking of trains to remain where there are known to be customers requiring additional assistance on board (e.g. VIPs, MIPs): communicate this to Service Control via briefing.	Joe Brown	8 January 2023 (Bakerloo Line)
6	Train Operators to always be informed when a customer requiring additional assistance is placed on their train, and what their destination station is.	Rule Book team (SHE)	Already captured in Rule Book 11, supported by 'TUAG' app utilised by station staff
7	Briefing to Train Operators to engage with customers while they 'change ends' through their train provided it is safe to do so, providing reassurance to overcarried customers.	Joe Brown	To be briefed to Train Operators by 8 January 2023 (Bakerloo Line)

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6. Monitoring and evaluation

Detail how you will or plan to monitor and evaluate the success of the mitigation actions and the overall impact of your decision or proposal

1.	How would you monitor and evaluate the success of the mitigating actions once your proposal has been implemented?	For eight weeks following the 'go live' on each line, every overcarry incident will be logged and the reasons for the overcarry (if known) recorded. This will be achieved by deploying station staff to the headwall of the departure platform to speak with the Train Operator, with a Microsoft form being completed on an iPad. This data will be analysed for trends and monitored at the Tier 2 Trains Health & Safety forum.
2.	How would you monitor the actual impact of your proposal or decision once your proposal has been implemented?	See above. We accept that there will be an increase in overcarried customers because of this change, the stated/suspected reasons for the overcarries will be collated and analysed for equality impact.

7. Decision-Making

Based on the above assessment, please select one of the options below that describe what you propose to do next. It is important that you provide the reason(s) for your decision and the evidence that supported these reasons.

1	Continue with your work because the assessment demonstrates that the work will have no potential negative or adverse impact on equality and inclusion groups.	
2	Justify and continue with your work despite negative equality impacts, and because there are other factors which make it reasonable for you to decide to continue with your work.	This work is acknowledged to contain an inherent increase in customer overcarry which may result in negative equality impacts. However, the impact on an overcarried customer is a delay to their onward journey of approximately ten minutes and they would have had to miss a range of audible and visible cues throughout their journey to become overcarried.

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		TfL deploy assistance to customers with disabilities to navigate the network in the form of staff supported by the TUAG app, and any train known to carry a customer requiring assistance, or any train turned at a reversing point at short notice would still be checked as at present. The benefits of this change outweigh this inconvenience: station staff currently deployed to detrainments (69 across the network) can be better utilised in more customer-facing roles, such as greeting customers requiring assistance at the station concourse and guiding them to their train. In addition, there is a predicted net reduction in assaults upon staff currently arising through detrainment staff extracting customers from reversing trains.
3	Change or adapt your work to ensure it does not adversely or disproportionately impact certain groups of people, communities, or miss opportunities to affect them positively	
4	Stop your work because there is a high probability of noticeable discrimination and negative impacts which cannot be objectively justified. Further research work may be needed.	



8. Sign off

EQIA author	
Name:	Joe Brown
Title:	Strategic Delivery & Change Manager, Customer Operations
Date:	2 December 2022
Signature	
EQIA reviewer (superuser or D&I team)	
Name:	Remi Osimade
Title:	Senior Assurance Manager EQIA
Date review completed:	30/12/2022
Signature	
EQIA signed off by (Senior accountable person)	
<p><i>The EQIA should be signed off by a senior accountable manager or senior project sponsor. They are ultimately responsible for ensuring that the EQIA requirements are taken onboard and delivered as part of the project deliverables and/or escalated to the decision-makers where necessary. By signing, they are confirming that the equality impacts have been identified, understood, and considered; those affected by the proposal/decision have been involved or consulted; and there are plans to mitigate any potential negative impact and monitor the actual impact of the proposal/decision after implementation.</i></p>	
Name:	Daniel Howarth
Title:	Head of Strategic Delivery and Change
Date:	23 January 2023
Signature	



Document history and version control

Document history	Version	Date	Summary of changes
	0.1	dd/mm/yy	First draft

Privacy Statement

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