

## 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

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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.

1. Key information and clarifying aims

<b>Title of strategy, service, business plan, programme, or project</b>	<b>B05E – 2024 DLR Mileage Reduction</b>				Unique ID No. (To be assigned by the D&I team)	
<b>Team/Department/Directorate</b>	Public Transport Service Planning					
<b>EQIA author</b>	Kai Chappell (Transport Planner, Rail Development)					
<b>Senior accountable person</b>	Alex Phillips (Rail Development Manager)					
<b>Date EQIA started</b>	17/01/2024		<b>Date EQIA completed</b>	23/01/2024		
<b>Project Stage</b>	XXX					
<b>What is the focus of this EQIA?</b> (Please tick which is appropriate)	Service	Project	Programme	Strategy or business plan	Others (please state below)	
	X					
<b>Who would benefit or be impacted by your strategy, service, business plan, programme, or project</b> (Please provide details of below)						
<b>Customer</b>	Customers who use the DLR, or would potentially use the DLR, especially those who use the International Route (Stratford International to Woolwich Arsenal) during the week.					
<b>Employee</b> (for workforce or employee <u>only</u> impact assessment, please email the D&I workforce team at <a href="mailto:EQIA@tfl.gov.uk">EQIA@tfl.gov.uk</a> )	N/A					
	<b>Background</b> The DLR currently operates under the service plan 'Optimisation II', which was introduced on 15 May 2023. The first new DLR train ('B23') was initially expected to enter passenger service around April 2024, but due to various factors which have impacted the					

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<p><b>Provide background information and outline the aims/objectives/scope of the strategy, service, business plan, programme, or project</b></p>	<p>delivery and deployment programme for the B23 replacement fleet, and the parallel scrappage plan for the B92 fleet, DLRL, KAD and PTSP have considered options to pre-emptively extend the life of the B92 fleet to avoid vehicle scrappages coming too soon and having causing major service planning challenges from Spring 2024 due to fleet unavailability. On 15<sup>th</sup> December 2023, the International Route of the DLR (Stratford International – Woolwich Arsenal) was reduced from three-car operation to two-car operation on Mondays and Fridays, and between 19<sup>th</sup> December 2023 and 1<sup>st</sup> January 2024 inclusive, the entire DLR network ran as a two-car operation. Further mitigative measures are now required to ensure as much resilience to any further delays to the deployment of new rolling stock in 2024.</p> <p>It is proposed that, based on the business case and optioneering process, the best interim solution is to reduce the length of services between Stratford International to Woolwich from three cars to two cars all week. This harmonises train lengths throughout the week, as opposed to the current pattern which only has short formation on Mondays and Fridays, but does reduce capacity during the week on these services.</p> <p><b><u>Customer Service Surveys for the DLR – breakdown of demographics</u></b></p> <p>The following analysis is based on Q1 2022-23 Customer Service Surveys for the DLR (fieldwork 01/04/2022-25/06/2022), as provided by DLRL Operations.</p> <p>Respondents (n = 651) were/identified as:</p> <ul style="list-style-type: none"> <li>• <b>Gender:</b> 47% male, 52% female</li> <li>• <b>Age:</b> 60% 16-34, 31% 35-54, 8% 55+</li> <li>• <b>Ethnicity:</b> 44% BAME, 56% non-BAME</li> <li>• <b>Social grade:</b> 64% ABC1, 34% C2DE</li> <li>• <b>Disability:</b> 15% disabled, 76% non-disabled</li> <li>• <b>Children in household:</b> 41% yes, 55% no</li> <li>• <b>Employment:</b> 73% working, 26% not working</li> <li>• <b>Home location (overall):</b> 5% Outside of London, 54% Inner London, 41% Outer London <ul style="list-style-type: none"> <li>○ 12% North London, 38% East London, 27% South London, 10% West London, 13% Central London</li> </ul> </li> </ul> <p>Customers' priorities were identified as journey time on trains, wait time at stations and personal safety at the station. This intervention <b>does not</b> have an impact on on-train journey times or wait times at stations. There is only a slight increase in the risk to personal safety which is detailed further below.</p> <p>Customers with higher satisfaction on the DLR were more likely to be female, 35-44 years old, non-disabled and non-BAME.</p> <p>These data are not sufficiently disaggregated to discern the impact of specific service changes. However, the service changes are likely to have a small negative impact on customers, as journey times will remain the same (there are no changes to service</p>
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frequency) but there will be increased crowding on-board services, reduced wheelchair and pushchair space and reduced priority seating, as well as passengers needing to move down the platform to board trains where they currently do not have to, impacting mobility impaired customers. This option was considered in a suite of other options, however, which were likely to have greater customer disbenefit, such as service reductions.

### **Travel in London: Understanding Our Diverse Communities 2019**

This report can be found here:

<https://tfl.gov.uk/corporate/publications-and-reports/equality-and-inclusion-publications>

These data are based on the London Travel Demand Survey (2016/17 – proportion of Londoners using modes of transport at least once a week):

### **Proportion of Londoners using modes of transport at least once a week (2016/17) [11]**

%	All	Men	Women	White	BAME	Aged 24 and under	65+	All less than £20,000	Dis-abled	Non-dis-abled
<b>Base</b>	<b>(17,560)</b>	<b>(8,450)</b>	<b>(9,110)</b>	<b>(11,173)</b>	<b>(6,099)</b>	<b>(4,437)</b>	<b>(2,691)</b>	<b>(4,966)</b>	<b>(1,729)</b>	<b>(15,831)</b>
Walking	95	95	95	95	96	97	87	93	81	96
Bus	59	56	63	56	65	66	65	69	58	60
Car as passenger	44	37	51	43	46	62	41	38	42	45
Car as driver	38	42	33	41	32	7	43	23	24	39
Tube	41	43	38	43	37	32	28	32	21	43
National Rail	17	18	15	19	13	12	12	11	9	17
Overground	12	13	11	12	12	10	6	11	7	12
Other taxi/minicab (PHV)	10	10	10	11	8	9	6	9	10	10
London taxi/ black cab	3	3	2	3	1	1	2	2	3	2
DLR	5	6	4	5	7	5	2	5	3	5
Tram	2	2	2	2	2	3	2	2	2	2
Motorcycle	1	2	0	1	0	0	-	1	0	1
Bicycle	8	11	5	10	4	12	2	5	3	9

Regular DLR customers are slightly more likely to identify as men than women, as BAME rather than white, and as non-disabled rather than disabled. They are much more likely to be 24 and under than 65 and over.

The report captures drivers of satisfaction for different groups of DLR customers. There is overlap in priorities in most cases, although the ranking varies somewhat. With regards to this change, the key item is likely to be “comfort inside the train” and “ease



of getting on the train”, due to inevitable increases in on-board crowding, a reduction in the number of available doors to board the train and reduction in available space for wheelchair and pushchair users.

The report also identifies that disabled customers generally have higher satisfaction with the DLR than other modes (except trams), with fewer barriers to use mentioned during the survey.

### Drivers of satisfaction for DLR users [15]

White customers	BAME customers
Ease of making journey	Comfort inside the train
Reliability of trains	Length of time journey took
Comfort inside the train	Ease of getting on the train
Length of time journey took	Ease of making journey
Length of time you waited for the train	Reliability of trains

### Drivers of satisfaction for DLR users [15]

Men	Women
Ease of making journey	Ease of making journey
Comfort inside the train	How issues using ticket were resolved
Length of time journey took	Reliability of trains
Reliability of trains	Ease of getting on the train
Ease of getting on the train	Comfort inside the train



### Drivers of satisfaction for DLR users [15]

All customers	65+
Ease of making your journey	Length of journey time
Comfort of the train	Ease of making your journey
Reliability of trains	Length of time waited for the train
Length of journey time	Feeling valued as a customer
Ease of getting on the train	Ease of getting on the train

### Drivers of satisfaction for DLR users [15]

All customers	16-24
Ease of making journey	Ease of making journey
Comfort of the train	Comfort of the train
Reliability of trains	Length of journey time
Length of journey time	Personal safety during journey
Ease of getting on the train	Reliability of trains

### Difficulties accessing public transport (2016/ 2017) [11]

%		Buses	Tube	DLR	Tram
<b>Disabled Londoners</b> (base = 1,473)	Impossible without help	23	27	20	19
	Difficult (but not impossible)	35	34	22	19
	Net: Impossible/difficult	58	61	42	38
	Not difficult to use	40	35	46	49
	Don't know/never use	1	4	13	13
<b>Wheelchair users</b> (base = 313)	Impossible without help	53	56	46	43
	Difficult (but not impossible)	34	27	23	19
	Net: Impossible/difficult	87	85	69	62
	Not difficult to use	9	11	18	6
	Don't know/never use	3	6	13	14



Drivers of satisfaction for DLR users [15]	
Disabled	Non-disabled
Ease of getting on the train	Ease of making your journey
Length of time waited for the train	Journey length
Information provided inside the train	Comfort inside the train
Reliability of trains	Reliability of trains
Ease of making your journey	Personal safety during the journey

  

Drivers of satisfaction for DLR users [15]	
All customers	Household income <£20,000
Ease of making your journey	Reliability of trains
Comfort of the train	Ease of making journey
Reliability of trains	Length of journey time
Length of journey time	Feel valued as a customer
Ease of getting on the train	Comfort inside the train

## 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.*

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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>
Age	See data in 'Background' in Section 1.
Disability <i>(please consider all forms of disabilities)</i>	See data in 'Background' in Section 1.
Sex <i>(male, female, non-binary and other identities)</i>	See data in 'Background' in Section 1.
Gender reassignment	We do not collect data on gender reassignment in our CSS surveys, nor were drivers of satisfaction in this regard captured in the 'Travel in London: Understanding Our Diverse Communities 2019' report.
Marriage/civil partnership	We do not collect data on marriage/civil partnership status in our CSS surveys, nor were drivers of satisfaction in this regard captured in the 'Travel in London: Understanding Our Diverse Communities 2019' report.
Pregnancy/maternity	We do not collect data on pregnancy/maternity in our CSS surveys, nor were drivers of satisfaction in this regard captured in the 'Travel in London: Understanding Our Diverse Communities 2019' report.
Race	See data in 'Background' in Section 1.
Religion or belief	We do not collect data on religion or belief in our CSS surveys, nor were drivers of satisfaction in this regard captured in the 'Travel in London: Understanding Our Diverse Communities 2019' report.
Sexual orientation	We do not collect data on sexual orientation in our CSS surveys, nor were drivers of satisfaction in this regard captured in the 'Travel in London: Understanding Our Diverse Communities 2019' report.





Disadvantaged, inclusion groups and communities e.g., carers, refugees, low income, homeless people etc.	See data in 'Background' in Section 1, which covers unemployment.  We also refer to the 2019 Indices of Multiple Deprivation and related datasets (see <a href="http://dclgapps.communities.gov.uk/imd/iod_index.html">http://dclgapps.communities.gov.uk/imd/iod_index.html</a> ).
Deprivation and socio-economic disadvantage of local communities e.g., people with lack of access to housing, education, social resources, geographic location, and income	See data in 'Background' in Section 1.

### 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		No external consultation has been undertaken, as the proposed change will not materially impact service frequency or pattern. The current service pattern was consulted on during the process of delivering the EqIA for Optimisation I in 2022.



	Yes	No	Don't Know	Comments
<b>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.</b>				
<b>Stakeholders and inclusion groups consulted/engaged with</b>	<b>Date</b>		<b>Feedback comments / issues raised</b>	
-				
	Yes	No	Don't Know	<b>Comments</b> (state clearly what this engagement or consultation will be and how it will be organised)
<b>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</b>		X		

#### 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)
<b>Race and ethnicity</b>		X				X	This change does not materially impact customers in this group.

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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)
<b>Sex</b> (male, female, non-binary and other identities)		X				X	This change does not materially impact customers in this group.
<b>Gender reassignment</b>		X				X	This service change is not believed to have an impact on this group due to the nature of the changes. No specific risks were identified through customer surveys.
<b>Age</b>		X			X		The reduction in train lengths may negatively impact older passengers as on-board crowding may make it uncomfortable to be on board the train and will reduce the number of seats available on board, including the number of priority seats. For customers aged 65+, the length of the journey, ease of getting on the train and length of time waited for the train have been identified as key drivers of customer satisfaction on the DLR. This service change may make it slightly more difficult to board the train due to there being fewer doors at which to board the train and the need to move further down the platform which may impact older passengers. However, train lengths will be harmonised throughout the week.
<b>Religion and belief</b>		X				X	This change is not likely to have any material impact on passengers in this group.
<b>Disability</b> (please consider all forms of disabilities)		X			X		This change is likely to have a negative impact on disabled customers with mobility and sensory impairments or long-term health conditions (and any assistants or carers) in the same manner as indicated previously in respect of the Age protected

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	Employee	Customer	Positive	Neutral	Negative	No Impact	Comments and actions to mitigate or take forward <i>(please include actions to mitigate the potential negative impact for this protected characteristic)</i>
							characteristic. This is due to a reduction in the available wheelchair space, reduction in the number of seats and priority seats available on board services and a reduction in the number of doors available to board trains.
<b>Sexual orientation</b>		X				X	This change is not likely to have any material impact on passengers in this group.
<b>Marriage or civil partnership</b>		X				X	This change is not likely to have any material impact on passengers in this group.
<b>Pregnancy and maternity</b>		X			X		This change is likely to have a negative impact on customers who are pregnant or caring for a child in the same manner as there is a reduction in the available space for pushchairs, the number of seats and priority seats on board a service.
<b>Disadvantaged, inclusion groups and communities</b> <i>e.g., carers, refugees, low income, homeless people etc</i>		X				X	This change does not materially impact customers in this group.
<b>Deprivation and socio-economic disadvantage of local communities</b> <i>e.g., people with lack of access to housing, education, social resources, geographic location, and income</i>		X				X	This change does not materially impact customers in this group.

## 5. Action planning

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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			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			



## 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.	<b>How would you monitor and evaluate the success of the mitigating actions once your proposal has been implemented?</b>	Not applicable.
2.	<b>How would you monitor the actual impact of your proposal or decision once your proposal has been implemented?</b>	<p>Monitoring the impact of any changes through:</p> <ul style="list-style-type: none"> <li>- Customer feedback to TfL via the Customer Contact Office (CCO)</li> <li>- Using internal data to monitor on-board crowding and demand levels for the length of the proposed change</li> </ul>

## 7. Decision-Making

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*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	<b>Continue with your work because the assessment demonstrates that the work will have no potential negative or adverse impact on equality and inclusion groups.</b>	
2	<b>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.</b>	The negative impacts outlined through this EqIA are smaller in comparison to alternative options, which include a larger service reduction due to fleet unavailability or increasing service headways which increase passenger wait times, on-board crowding, and total journey times.
3	<b>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</b>	
4	<b>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.</b>	

## 8. Sign off

EQIA author	
Name:	Kai Chappell
Title:	Transport Planner
Date:	23/01/2024
Signature	

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### EQIA signed off by (Senior accountable person)

*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.*

Name:	
Title:	
Date:	
Signature	

### Privacy Statement

Transport for London (TfL), its subsidiaries and service providers, will use your personal information for the purposes of assessing Customer Equality Impact and administration. Your personal information will be properly safeguarded and processed in accordance with the requirements of privacy and data protection legislation. We will not use your data for marketing purposes. For more information on how TfL processes your personal information please visit [www.tfl.gov.uk/privacy](http://www.tfl.gov.uk/privacy)

