

# Equalities Analysis Assessment

## 1 - Proposal summary information

EAA title: School Street

Please describe your proposal: Scheme  
Implementation of the extension of a permanent School Streets at Mayfield Primary School, enforced by Automatic Number Plate Recognition (ANPR) cameras

Is it HR related? No

Corporate purpose: officer decision

### What is your proposal looking to achieve? Who will be affected?

Please provide an overview of the aims, objectives, and desired outcomes of what you are proposing. Who currently uses the service that will be affected by your proposal? Who will be affected by any changes? What are their current needs? Please add your data here.

School Streets are schemes where the streets near a school are closed to most vehicles at school opening and closing times. Closing the streets to school and through traffic helps to achieve a safer, more pleasant environment for everyone using the streets, whilst maintaining access for vehicles registered at residence and businesses within the zone, and pedestrians and cyclists.

School Streets are usually implemented to encourage walking, scooting or cycling, improve air quality and reduce road danger outside of schools.

In 2022 a School Street selection criteria that included the following categories was created to prioritise the implementation of schemes:

- Road safety (casualties)
- Air Quality
- Index of Multiple Deprivation
- TfL Travel for Life engagement
- Active travel
- Location suitability

Schools chosen to participate in these schemes have already tried other means of improving the road environment around the school gates. They will have tried publicity, training and promotion activities to improve the situation, often with limited success. Schools will support their scheme by continuing to promote active travel and raising awareness of road safety for the school journey, through the TfL Travel for Life programme.

Signs at the entrances to the scheme will inform drivers of the restrictions. The owners of non-registered vehicles will receive a penalty charge notice if they enter the scheme during the times of operation.

The School Street will be enforced by Automatic Number Plate Recognition (ANPR) cameras for the duration of the agreed times.

Dispensation is given for vehicles registered at residence and businesses within the zone; blue badge holders employed by businesses within the zone; school staff and parent blue badge holders that require access to the school; and all emergency service vehicles. Other vehicles,

including parents/carers of school children, visitors and deliveries, are not permitted to access the School Street.

The schemes are funded from the Council's Capital Growth budget.

### **What will the impact of your proposal be?**

Please provide a before and after picture of the service that will be affected by your proposal for example how does it currently operate and then how it will operate after your proposal has been implemented. Where possible please be clear on the number of people or size of the community affected.

The school run makes up over a quarter of London's morning traffic. In Ealing 82% of primary pupils live up to 1 mile from school. At schools that work with the school travel team (ie. those that submit mode of travel data) 64% travel actively to school

The average increase in active travel at School Street schools is 8%, with a 5% reduction in car use.

There is a significant increase in traffic and congestion at the start and end of the school day.

The overall benefits of Schools Streets are:

- Reduced school related parking and congestion at the school gates, within the school street zone,
- Improved environment for safe and sustainable travel to school
- Raised awareness of active travel and encouraging walking, scooting and cycling by the school community
- Improved mental and physical health and well-being by increasing active travel
- Reduced air pollution through the reduction in car use

The scheme will help to achieve the 3 core objectives of the LBE Transport Strategy:

- Modeshift – increasing active travel
- Reducing the environmental footprint of transport – *improve air quality*
- Improving road safety – reduce road safety incidents

The Ealing School Streets programme has been in place since September 2020. 28 schools have been supported with School Streets. These schemes have been successfully implemented in many Local Authorities in London and nationally, including industry leaders Hackney, Camden, Birmingham, Solihull and Edinburgh, using various types of enforcement. The result is a reduction in traffic around the school gates and more children walking, cycling or taking public transport to their school, instead of being dropped off by car, at the school gate.

Resources and research supporting the implementation of School Streets to increase active travel can be found on this website: <https://www.napier.ac.uk/about-us/news/school-street-closures> This includes a review of 16 existing School Streets, showing that these closures can improve the number of children walking, cycling and wheeling to school without creating road safety problems

Residents in surrounding streets may be concerned that there will be increased congestion for them. We will be working with school communities to identify and promote locations away from schools where parents can park; this should disperse the cars over a wider area than at present. Our experience and that of other London Boroughs shows that residents in surrounding roads are not adversely affected as parking by families who choose or need to drive will be dispersed over a

much wider area. Additionally, the school will be promoting and encouraging active travel to reduce car use for the school journey.

The research report by Edinburgh Napier University finds School Street related traffic displacement doesn't cause road safety issues in neighbouring streets

<https://www.napier.ac.uk/about-us/news/school-street-closures>

In March 2021 the GLA published a study that investigated the air quality benefits of new School Streets, installed as part of the Mayor's London Streetspace Programme, in response to the coronavirus pandemic. It demonstrated that School Streets can play a role in reducing peak exposure to pollution concentrations outside of schools.

[https://www.london.gov.uk/sites/default/files/school\\_streets\\_monitoring\\_study\\_march21.pdf](https://www.london.gov.uk/sites/default/files/school_streets_monitoring_study_march21.pdf)

Qualitative research on School Streets, undertaken by TfL in 2022, found they are seen as a positive step towards safer, calmer and more healthy local areas, with benefits such as a growing sense of neighbourhood. [School Streets qualitative research 2022 \(tfl.gov.uk\)](#)

## 2 - Impact on groups having a protected characteristic

### Age

A person of a particular age or being within an age group

**Is the impact:** positive | negative | neutral

#### Describe the impact

Please be as specific and clear as possible when describing the impact and include any local data for instance service usage. If this is lacking, please include regional or national data or research. Please identify any differential impact on different age groups. Please note if there is no differential impact on people with this characteristic, please state this.

#### CONSTRUCTION

Construction is the installation of road signs. These will be fixed to existing poles where possible, or new poles installed if required. There will be no significant noise or obstruction. The impact is, therefore considered to be **neutral**.

#### OPERATION (implementation)

If a particular resident is wholly or mostly dependent on their own vehicular travel (e.g. older people with a significant mobility impairment), the implementation of the scheme will have **no impact** as all residents of the school street, including those with mobility issues, will be able to apply for a free permit allowing access during the closure time.

There is **slight impact** on others that are wholly or mostly dependent on vehicular travel as their taxis and other vehicles are not eligible for permits and these vehicles will need to arrive outside of operational times. However they can take alternative routes during operational times.

No buses are routed through any of the School Streets.

The impact on older pedestrians and school children and their families is expected to be **positive**. Road safety in the residential area is expected to be improved with lower traffic volumes supporting more walking and cycling in the area.

For those who are able to walk and cycle and choose to utilise active travel modes, the scheme is expected to be **positive**. The expected reduction in traffic in the residential area is expected to make it more conducive to walking and cycling with an associated lower road safety risk.

Access will be maintained for emergency vehicles through Automatic Number-plate Recognition (ANPR) cameras. As the School Street is a low traffic zone and unauthorised vehicles will not be able to enter the area, Emergency Services may find the School Streets provides unhindered access for their vehicles which could help response times.

Officers have consulted and continue to work with the emergency services to resolve any significant issues, therefore, it is concluded that there will be **no significant impact**.

#### Describe the alternatives and mitigating actions which have been considered to reduce negative effect:

Please describe any actions you will take to limit the impact of your proposal on this group. Please be open and forthright, decision makers need to be provided with as clear a picture as possible.

Residents and businesses within the scheme can apply for free permits for vehicles registered at their properties. Residents can apply for additional permits for carers that have official notification

of their duties. Their visitors are not permitted to enter the zone and will be asked to arrive outside of the closure times.

Blue badge holders that require access to the school or a business within the School Street during operational times are eligible to apply for free permits to access the area at all times.

## Disability

A person has a disability if s/he has a physical, mental or sensory impairment which has a substantial and long-term adverse effect on their ability to carry out normal day to day activities.<sup>1</sup>

**Is the impact:** positive | negative | neutral

### Describe the impact

Please be as specific and clear as possible when describing the impact and include any local data for instance service usage. If this is lacking, please include regional or national data or research. Please identify any differential impact on different age groups. Please note if there is no differential impact on people with this characteristic, please state this.

#### CONSTRUCTION

Construction is the installation of road signs. These will be fixed to existing poles where possible, or new poles installed if required. There will be no significant noise or obstruction. The impact is therefore considered to be **neutral**.

#### OPERATION

No street furniture will be placed on the footway or block any desire lines at junctions, therefore, operation of the implemented scheme would be **neutral** for visually impaired people.

Residents living within the School Street, who are blue badge holders, that drive a motor vehicle, are eligible for a School Street permit for their own vehicle.

If a particular person living within a School Street is wholly or mostly dependent on vehicular travel provided by others (e.g. a person with a significant mobility impairment or wheelchair users requiring taxis), the operation of the finished scheme will have **slight negative impact**. These vehicles are not usually eligible for permits and would need to arrive outside of operational times. However reasonable adjustments can be made and a temporary permit system is available on a case-by-case basis, to enable these residents to access transport provided by others when required. The impact can then be considered **neutral**.

Officers will advise the resident of the application process in order to support these registrations.

Blue badge holders who work in the area can register with the Council to allow them access to the closure during operational times. Any blue badge holders dropping off and collecting pupils should also be exempt, subject to them also applying to register for dispensation. Parents or carers of a child with a blue badge can register with the Council to allow them access to the closure during operational times.

Applications for temporary permits will be considered if access is an issue due to short term health or mobility issues.

Approved providers of Special Needs Transport are eligible to apply for free permits to enter the zone to undertake services of a local authority in pursuance of its statutory powers or duties.

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<sup>1</sup> Due regard to meeting the needs of people with disabilities involves taking steps to take account of their disabilities and may involve making reasonable adjustments and prioritizing certain groups of disabled people on the basis that they are particularly affected by the proposal.

Operation of the proposed scheme will have **no additional impact** on staff and parent blue badge holders and providers of Special Needs Transport as they can apply for an exemption.

The proposed scheme will have some **negative impact** on those with disabilities reliant on car or vehicle travel during the defined periods of the day at school opening and closing times as vehicles not registered within the scheme area will not be permitted to enter the road closure.

Operation of the implemented scheme is likely to generate a **slight positive impact** on an unknown number of people with breathing difficulties if traffic volumes within the residential area reduce and traffic volumes on the boundary roads remain broadly similar to pre-COVID volumes as expected due to reduced air pollution.

Operation of the finished scheme is likely to generate a **positive impact** on an unknown number of pedestrians and cyclists with a disability due to reduced traffic volumes making for a more pleasant, safer walking and cycling environment.

Access will be maintained for emergency vehicles through Automatic Number-plate Recognition (ANPR) cameras. As the School Street is a low traffic zone and unauthorised vehicles will not be able to enter the area, Emergency Services may find the School Streets provide unhindered access for their vehicles which could help response times which would a **positive impact**.

### **Describe the alternatives and mitigating actions which have been considered to reduce negative effect:**

(Please describe any actions you will take to limit the impact of your proposal on this group. Please be open and forthright, decision makers need to be provided with as clear a picture as possible.)

Disabled residents and business employees within the scheme can apply for free permits for vehicles registered at their property. Residents can apply for additional permits for carers that have official notification of their duties. Their other visitors are not permitted to drive into the zone and will be asked to arrive outside of the closure times or park in alternative streets. Parents or carers of a child with a blue badge will be granted a dispensation and are eligible to apply for a free permit.

Approved providers of Special Needs Transport will be permitted to enter the zone.

Impacts will be closely monitored and any on-going adverse impacts will be considered, as appropriate.

Officers will write to all residents in the local area to make them aware of the proposal in advance so that alternative arrangements (e.g. new routes) are known.

## **Gender reassignment**

This is the process of transitioning from one sex to another. This includes persons who consider themselves to be trans, transgender and transsexual.

**Is the impact:** neutral

### **Describe the impact**

Please be as specific and clear as possible when describing the impact and include any local data for instance service usage. If this is lacking, please include regional or national data or research. Please identify any differential impact on different age groups. Please note if there is no differential impact on people with this characteristic, please state this.

There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.

**Describe the alternatives and mitigating actions which have been considered to reduce negative effect:**

Please describe any actions you will take to limit the impact of your proposal on this group. Please be open and forthright, decision makers need to be provided with as clear a picture as possible.

Not applicable.

## Race

A group of people defined by their colour, nationality (including citizenship), ethnic or national origins or race.

**Is the impact:** neutral

**Describe the impact**

Please be as specific and clear as possible when describing the impact and include any local data for instance service usage. If this is lacking, please include regional or national data or research. Please identify any differential impact on different age groups. Please note if there is no differential impact on people with this characteristic, please state this.

There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.

**Describe the alternatives and mitigating actions which have been considered to reduce negative effect:**

Please describe any actions you will take to limit the impact of your proposal on this group. Please be open and forthright, decision makers need to be provided with as clear a picture as possible.

Not applicable.

## Religion and belief

Religion means any religion. Belief includes religious and philosophical beliefs including lack of belief (for example, Atheism). Generally, a belief should affect a person's life choices or the way you live for it to be included.

**Is the impact:** negative

**Describe the impact**

Please be as specific and clear as possible when describing the impact and include any local data for instance service usage. If this is lacking, please include regional or national data or research. Please identify any differential impact on different age groups. Please note if there is no differential impact on people with this characteristic, please state this.

If an attendee of a religious building is wholly or mostly dependent on car or vehicular travel (e.g. a person with a significant mobility impairment or wheelchair users), the operation of the School Street may generate a **slight negative impact** initially. However, this is not specific to any religious belief so is covered more fully in the disability section of this EEA.

## **Describe the alternatives and mitigating actions which have been considered to reduce negative effect:**

Please describe any actions you will take to limit the impact of your proposal on this group. Please be open and forthright, decision makers need to be provided with as clear a picture as possible.

Not applicable.

## **Sex**

Someone being a man or a woman.

**Is the impact:** slight negative | neutral

### **Describe the impact**

Please be as specific and clear as possible when describing the impact and include any local data for instance service usage. If this is lacking, please include regional or national data or research. Please identify any differential impact on different age groups. Please note if there is no differential impact on people with this characteristic, please state this.

Women are more likely to do most of the work involved in looking after children and other family members. Data from Office of National Statistics suggests that mothers in two-parent households were providing two-thirds more childcare than men during COVID-19 lockdowns [81854 \(peoplemanagement.co.uk\)](https://www.81854.peoplemanagement.co.uk)

According to the [2014 National Travel Survey](#), trips to escort children to school are more likely to be made by women aged 30 to 49. This trend has continued as shown in The [National Travel Survey 2021: Trips by purpose, age and sex - GOV.UK \(www.gov.uk\)](#). 8% of all trips made by females and 4% made by males in 2021 are for escort education.

The School Streets may impact an unknown number of parents who drop children at school and go on to work and are therefore constrained by time. This may have a **slight negative impact**.

## **Describe the alternatives and mitigating actions which have been considered to reduce negative effect:**

Please describe any actions you will take to limit the impact of your proposal on this group. Please be open and forthright, decision makers need to be provided with as clear a picture as possible.

Parents who feel they need to drive can park legally nearby and walk the last part of the journey. If available, the school can provide information on locations where parents can park, such as supermarket, leisure centre car parks or Park & Stride areas. In Ealing, 84% of pupils live within 1 mile of their school. This is a 20 minute walk. 62% live within a ten minute walk of school.

## **Sexual orientation**

A person's sexual attraction towards his or her own sex, the opposite sex or to both sexes, covering including all LGBTQ+ groups.

**Is the impact:** neutral

### **Describe the impact**

Please be as specific and clear as possible when describing the impact and include any local data for instance service usage. If this is lacking, please include regional or national data or research.



Please identify any differential impact on different age groups. Please note if there is no differential impact on people with this characteristic, please state this.

There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.

**Describe the alternatives and mitigating actions which have been considered to reduce negative effect:**

Please describe any actions you will take to limit the impact of your proposal on this group. Please be open and forthright, decision makers need to be provided with as clear a picture as possible.

Not applicable.

## **Pregnancy and maternity**

The period after giving birth - linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, including breastfeeding.

**Is the impact:** positive | neutral

**Describe the impact**

Please be as specific and clear as possible when describing the impact and include any local data for instance service usage. If this is lacking, please include regional or national data or research. Please identify any differential impact on different age groups. Please note if there is no differential impact on people with this characteristic, please state this.

This group may have greater reliance on motorised vehicles during the period of pregnancy or maternity. However the scheme does not discriminate against this group.

Emergency services will be able to access the road closures meaning that response times are expected to be largely unaffected. This may be perceived as a **slight negative impact**, but officers have consulted and continue to work with the emergency services to resolve any significant issues. As the School Street is a low traffic zone and unauthorised vehicles will not be able to enter the area, Emergency Services may find the School Streets provide unhindered access for their vehicles which would have a **positive impact**.

**Describe the alternatives and mitigating actions which have been considered to reduce negative effect:**

Please describe any actions you will take to limit the impact of your proposal on this group. Please be open and forthright, decision makers need to be provided with as clear a picture as possible.

If required a temporary permit can be requested, supported by confirmation from a medical practitioner.

## **Marriage and civil partnership**

Marriage: A union between a man and a woman. or of the same sex, which is legally recognised in the UK as a marriage.

Civil partnership: Civil partners must be treated the same as married couples on a range of legal matters.

**Is the impact:** neutral

**Describe the impact**

Please be as specific and clear as possible when describing the impact and include any local data for instance service usage. If this is lacking, please include regional or national data or research. Please identify any differential impact on different age groups. Please note if there is no differential impact on people with this characteristic, please state this.

There is no clear evidence, data or rationale to expect that these works will have a differential impact on people with this characteristic.

**Describe the alternatives and mitigating actions which have been considered to reduce negative effect:**

Please describe any actions you will take to limit the impact of your proposal on this group. Please be open and forthright, decision makers need to be provided with as clear a picture as possible.

Not applicable.

### 3 - Human Rights<sup>2</sup>

Does your proposal impact on Human Rights as defined by the Human Rights Act 1998? Yes

If yes, please describe the effect and any mitigating action you have considered.

Articles 1 and Article 8 of the Protocol to the European Convention of Human Rights (which are enshrined in the 1998 Act) confirm as follows

Article 1 "Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and the general principles of international law. The preceding provisions shall not, however, in any way impair the right of the state to enforce such laws as it deems necessary to control the use of property in accordance with the general interest...."

Article 8 "Everyone has the right to respect for his private and family life, his home and his correspondence. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country. For the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others'.

To the extent that Articles 1 and/or 8 applies it is considered that the decision to introduce traffic orders to create School Streets is justified in the public interest given the anticipated positive outcomes outlined above.

Does your proposal impact on the rights of children as defined by the UN Convention on the Rights of the Child? Yes

If yes, please describe the effect and any mitigating action you have considered.

The proposed School Street schemes considers the impact on children and the impact on their physical safety and well-being. The School Street scheme aims to improve their physical safety and well-being.

Does your proposal impact on the rights of persons with disabilities as defined by the UN Convention on the Rights of persons with disabilities? Yes

If yes, please describe the effect and any mitigating action you have considered.

The proposed School Street schemes has considered the accessibility issues for persons with disabilities to live independently. This includes the identification and elimination of obstacles and barriers to accessibility.

The proposed School Street schemes does impact on some persons with disabilities who are not entitled to an exemption. It is considered that this is justified in the public interest given the anticipated positive outcomes outlined above.

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<sup>2</sup> For further guidance please refer to the Human Rights & URNC Guidance on the Council Equalities [web page](#).

## 4 – Conclusion

Please provide a brief overview or summary of your analysis considering the protected characteristics. Please describe the overall impact of your proposal where possible and mitigating actions undertaken by other areas of the council or by local partners.

There are no significant negative impacts on any of the groups within the Protected Characteristics. It is anticipated that there will be positive impacts for children. Any negative impacts will be closely monitored and any on-going adverse impacts will be taken into account to identify appropriate mitigations, as has been outlined above in instances where the scheme's proposals will impact a persons health due to their age and/or disability, for example, notification of their eligibility for an exemption.

**What evidence, data sources and intelligence did you use to assess the potential impact or effect of your proposal? Please note the systems or processes you used to collect the data that has helped inform your proposal. Please list the file paths and/or relevant web links to the information you have described.**

Please list all sources here: for instance, local consultation, residents' survey, census etc.

- Data available from Office of National Statistics - [Women shoulder the responsibility of 'unpaid work' - Office for National Statistics](#)
- Evidence from research of School Street installations - [School street closures could improve amount of walking, cycling and wheeling to school, study shows \(napier.ac.uk\)](#)
- Evidence from evaluation of School Streets
  - [School Streets: Intervention Sites vs. Control Sites Full Report \(tfl.gov.uk\)](#)
  - [School Streets qualitative research 2022 \(tfl.gov.uk\)](#)
- Air Quality Monitoring Study - [London School Streets](#)

## 5 - Action Planning

What are the next steps for the proposal please list i.e. when it comes into effect, when mitigating actions linked to the protected characteristics above will take place, how you will measure impact etc.

<b>Action</b>	<b>Outcomes</b>	<b>Success measures</b>	<b>Timescales, milestones</b>	<b>Lead officer contact details</b>
Provide free permits to allow access for vehicles registered to residents, businesses and organisations within the scheme and others who are exempt	Exempt vehicles have access to the School Street at all times	Letters sent to those eligible for permits, advising how to apply.  Permit applications made via online portal and queries raised via school street mailbox.	From 1 month prior to the start and for the duration of the scheme	Transport Planning Service
Closure enforced by ANPR camera	Signage and camera in place to enforce access restriction	Improvement in compliance of access restriction	From start date and during operating times	Transport Planning Service
Active travel maps are provided, if available. And active travel is promoted by the schools	Families have information on walking routes and suitable Park & Stride locations.  Schools are encouraged to join TFL Travel for Life programme	PDF versions of the active travel map provided to share with families via their websites  Schools achieve or maintain TFL Travel for Life accreditation, or access the website for ideas.	Maps provided during Autumn term.  TFL Travel for Life accreditation is approved in Summer term	Transport Planning Service
Set up and communicate a feedback mechanism	Stakeholders are aware of how to report issues that may impact them	School Streets mailbox open and receiving emails	Continual process	Transport Planning Service
Implement monitoring regime	Scope, obtain or survey items for monitoring (mode of travel data, traffic surveys.)  Seek feedback from school community on	Collection of data  Collection of feedback  Act upon feedback where reasonable and applicable	All data to be collected one year after original collection date.	Transport Planning Service

Action	Outcomes	Success measures	Timescales, milestones	Lead officer contact details
	implementation of the scheme			
Use of industry standards and guidelines in design	Minimise any negative impacts on any equalities group	Undertake audit	2 months after installation	Highways
Consider all impacts on those that identify within the protected characteristics definition equalities group as part of the design	Avoid adding to/ removing elements which specifically and significantly negatively impact on any equalities group	Undertake audit	2 months after installation	Highways

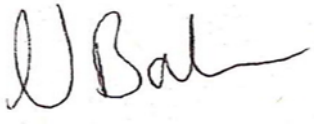
**Additional comments**

None

## 6 - Sign off

All EAAs must be signed off once completed.

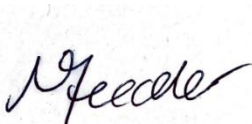
### Completing officer:

Signed: 

Name: NICKY BATKIN

Date: 5 July 2024

### Service director:

Signed: 

Name: NICKY FIEDLER

Date: 25th July 2024

HR related proposal Directorate **HR officer**

Signed:

Name:

Date:

For EAA's relating to Cabinet decisions:  
received by Committee Section for publication by (date):

# Appendix 1

## Legal obligations under Section 149 of the Equality Act 2010

- As a public authority we must have due regard to the need to:
  - eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act
  - advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
  - foster good relations between persons who share a relevant protected characteristic and persons who do not share it
  
- The protected characteristics are:
  - age
  - disability
  - gender reassignment
  - race
  - religion and belief
  - sex
  - sexual orientation
  - pregnancy and maternity
  - marriage and civil partnership
  
- Having due regard to advancing equality of opportunity between those who share a protected characteristic and those who do not, involves considering the need to:
  - remove or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
  - take steps to meet the needs of persons who share a relevant characteristic that are different from the needs of the persons who do not share it
  - encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low
  
- Having due regard to fostering good relations between persons who share a relevant protected characteristic and persons who do not, involves showing that you are tackling prejudice and promoting understanding.
  
- Complying with the duties may involve treating some people more favourably than others; but this should not be taken as permitting conduct that would be otherwise prohibited under the Act.