



Crossrail Inclusivity Policy

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Contents

1	Purpose.....	3
2	Policy principles.....	3
3	Policy statement.....	3
4	Policy content.....	4
4.1	Who does the policy apply to?	4
4.2	What does the policy cover?	5
4.3	How will the policy be implemented?	5
4.4	When and where will the policy be applied?	6
5	Approval and amendment	7
6	Review	7
7	Policy owner	7
	Appendix 1 — legislative framework.....	8
	Appendix 2 — standards and guidelines.....	9
	Appendix 3 — prioritization criteria	10
	Appendix 4 — key reporting stages.....	11
	Appendix 5 — related policies and documents.....	12

1 Purpose

- 1.1.1 The Crossrail Limited (CRL) inclusivity policy addresses the need for inclusion in the planning, design, construction and operation of Crossrail.
- 1.1.2 The policy is developed in the context of a complex legislative framework, summarized in Appendix 1, which places obligations on CRL. The policy will enable CRL to fulfil its obligations, as well as go beyond the letter of the law in implementing good practice. The purpose of this policy is to:
- set out CRL's commitment to contributing to an inclusive rail service;
 - provide a common framework from which to set standards for the planning, design, construction and operation of Crossrail services including its employment practices; and
 - demonstrate CRL's commitment to inclusion to its key stakeholders and partners and enable stakeholders to hold it accountable for inclusion.

2 Policy principles

- 2.1.1 The principles of the CRL inclusivity policy are to:
- contribute to the creation of an inclusive transport system;
 - ensure the construction and operation of Crossrail with the minimum practicable negative impact on priority equality groups (women; black and minority ethnic people; disabled people; lesbians, gay men, bisexual and transgender people; faith groups; older people, children and young people, and those on low income);
 - take all decisions that affect the public on the basis of evidence and inclusive consultation with priority equality groups; and
 - work to achieve the greatest practicable benefit to communities by working in partnership with other transport providers, with developers and with local authorities.

3 Policy statement

- 3.1.1 CRL is committed to its contribution to a transport system that delivers benefits to people living in, working in or visiting London regardless of their social identity. To this end, CRL will:
- make inclusion a **priority** in its mainstream activities;
 - develop **partnerships** with stakeholders, including:
 - other transport providers;
 - community;
 - staff;
 - contractors;
 - local and national government; and
 - industry;
 - approach its activities **proactively** by:

- minimizing the potential for discrimination;
- seeking out opportunities to promote inclusive development;
- seeking out the views of stakeholders;
- seeking to ensure that priority equality groups do not experience disproportionate disadvantage as a result of the planning, design, construction and operation of Crossrail;
- help people who are presently marginalized to derive benefits, such as improved job opportunities, from having access to a modern transport system;
- create new **possibilities** for people living in, working in or visiting London by:
 - increasing equal opportunity; and
 - ensuring equal outcomes in the services Crossrail will provide;
- **promote** the effectiveness of the policy by:
 - developing targets to measure progress; and
 - monitoring the implementation of the policy through the achievement of the targets.

4 Policy content

4.1 Who does the policy apply to?

4.1.1 Staff and contractors

The policy applies to all CRL staff and its contractors. All staff and contractors can expect treatment in accordance with the policy and will be expected to implement the policy in the course of their work.

4.1.2 Customers

The policy enables CRL to address the needs of people who are from the seven prioritized equality strands identified in Transport for London's equality and inclusion policy framework namely:

- gender — women and transgender people;
- race — black and minority ethnic people;
- disability — people with physical and sensory impairments, learning difficulties and mental health requirements;
- sexual orientation — lesbians, gay men, and bisexual people;
- religion — faith groups;
- age — older people, children and young people; and
- socio-economic — those in or from deprived areas or socially excluded groups

4.1.3 CRL recognizes that people may belong to and identify with more than one of the above groups, and that this may complicate the issues that they experience as a result of the development and operation of the Crossrail service.

4.2 What does the policy cover?

4.2.1 There is no area of the Crossrail system that is unaffected by the need for inclusivity. The policy applies to all CRL activities — employment-related activities, and the planning, design, construction and operation of transport services, including:

- Human Relations policies, procedures and practices;
- the corporate governance framework and business planning activities;
- processes for gathering and disseminating information;
- planning and design policies, procedures and standards;
- procurement policies and procedures and the contractual framework; and
- policies and standards which govern the operation and delivery of transport services.

4.2.2 CRL will apply the policy consistently and continuously throughout each stage of the project, ensuring that the railway can be constructed and operated in accordance with the principles of the policy.

4.3 How will the policy be implemented?

4.3.1 The CRL leadership team is committed to ensuring that the Crossrail service is fully inclusive, and does not disadvantage the prioritized groups in its planning, design, construction or operation, or in the direct or indirect employment of staff. To this end they have ratified this policy, and expect all staff to implement it. The leadership team will ensure that inclusivity is treated as a priority within all mainstream activities by:

- proactively raising it as a key issue with stakeholders, be they from community groups, local and national government, commercial contractors, or other service providers including private companies;
- listening to the underlying needs and expectations of community groups, operating in a culture of transparency, reviewing CRL's practices, resolving conflicts and dovetailing outcomes;
- adopting a future mindset by proactively anticipating and incorporating the rising expectations of priority groups; and
- agreeing challenging targets, and monitoring and reporting the achievement of those targets.

4.3.2 The CRL team will:

- establish the requirements of community groups through:
 - community consultation — with local and London-wide groups and with national groups where no local group is available;
 - information gathered from third parties as a result of community representation or engagement;
 - research findings — either through existing research findings or through conducting new research;

- measuring the transport use of priority groups, their journey patterns and travel horizons compared with the transport use of other groups;
- an Equality Impact Assessment — as part of Transport for London's and the Department for Transport's fulfilment of duty under the Race Relations Amendment Act 2000;
- keeping abreast of demographic, social policy and legislative change as well as technological advancement and state of the art design solutions;
- take full account of the needs of priority groups at the earliest stages of planning, throughout the design and build stages and in operating services post completion;
- seek expert advice and support in reconciling the differences where the requirements of two or more groups are perceived to be in conflict with each other. In reconciling requirements, the possibility of creating 'win-win' outcomes must be the first consideration. The groups concerned must always play a full part in the process, with outcomes and decisions clearly communicated to them;
- proactively seek out opportunities to create the greatest social improvement, including in surrounding development areas where it can achieve influence, and increase equality of opportunity between social groups;
- Ensure that the development, delivery and future operation of the scheme does not create an adverse social impact for the communities which it serves. Current community activity and access to healthcare, education, employment, shops, leisure facilities, friends and families must not worsen overall for any group, ie mitigation measures will be taken where there is risk.

4.3.3 The CRL team will apply good practice and adhere to the standards and guidelines listed in Appendix 2.

4.4 When and where will the policy be applied?

4.4.1 The CRL team will:

- apply the policy consistently and continuously throughout each stage of the project, ensuring that the service can be operated in accordance with the principles of the policy;
- ensure that resources are appropriately allocated to prioritize activity in the areas of greatest positive impact, whether by geography or issue. Prioritization will be based on criteria set out in Appendix 3, anticipating changes to London's demography;
- proactively report progress on equality and social inclusion at key and agreed stages of the project delivery as set out in Appendix 4.

5 Approval and amendment

- 5.1.1 The policy was approved for consultation by the executive committee on 20 January 2005.
- 5.1.2 The policy statement was created December 2006 and approved by the executive chairman on 02 March 2007
- 5.1.3 The policy was reviewed, updated and approved March 2009

6 Review

- 6.1.1 The policy will be reviewed annually and more often in the event of a significant change in circumstances including new legislation, or a specific request from stakeholders.

7 Policy owner

- 7.1.1 The policy is owned by the chief executive.

Appendix 1 — legislative framework

There are a number of laws in force designed to protect the rights of certain groups of people within society that CRL should consider in the development of the Crossrail rail service, and its subsequent operation. Some of these only affect the way that staff are employed, for example the Employment Equality Regulations 2003, whilst others affect both employment and the provision of services, for example the Race Relations Amendments Act 2000. Uniquely, the Disability Discrimination Act 1995 contains specific transport vehicle regulations. These will directly affect the design and manufacture of the Crossrail rail vehicles.

Key civil rights legislation

- The Sex Discrimination Act 1975 (SDA)
- The Race Relations Act 1976 (and Race Relations Amendment Act 2000) (RRA/RRAA)
- The Disability Discrimination Act 1995 (and Rail Vehicle Accessibility Regulations 1998) (DDA/RVAR)
- The Disability Discrimination Act 2005
- The Equal Pay Act 1970 (EPA)
- The Employment Equality Regulations 2003 (EER)
- The Employment Equality Regulations (Age) 2006
- The Employment Equality Regulations (Religion or Belief) 2003
- The Human Rights Act 1998 (HRA)
- The Racial and Religious Hatred Act 2006
- Equality Act 2006
- The Equality Act (Sexual Orientation Regulations) 2007

Key transport legislation

- The Transport Act 2000
- The New Roads and Street Works Act 1991
- The Crossrail Act 2008
- The Railways Act 2005

Other key legislation

- The Greater London Authority Act 1999
- the needs of lesbians, gay men, bisexual and transgender people.

Appendix 2 — standards and guidelines

- Equality Standard for Local Government
- DDA Part 3 Code of Practice — Goods Facilities and Services
- Rail Vehicle Accessibility Regulations Guidelines
- Inclusive Mobility — A guide to best practice on access to pedestrian and transport infrastructure
- BS8300 Design of buildings and their approaches to meet the needs of disabled people — Code of Practice
- Approved document M of the Building Regulations
- Greater London Authority Equality Policy Framework
- Department for Transport - Accessible Train and Station Design for Disabled People: A Code of Practice 2008

Appendix 3 — prioritization criteria

Aim of prioritization

Prioritization is a necessary process which enables finite resources to be fairly allocated so that the greatest positive social impact will be achieved for communities as Crossrail is planned, developed, constructed and operated. It is also necessary as a way of ensuring that resources are available to eliminate negative social impact. Prioritization is a skilled and sensitive process which is only effective when approached in partnership with all parties affected and using impartial and agreed criteria.

Principles of prioritization

- CRL's aim is for full inclusion for all groups.
- The prioritization criteria will be transparent, published and promoted within all community groups.
- No individual or group is considered to be more important to CRL within the customer or staff base than another.
- Prioritization decisions must be informed by evidence-based assessment rather than personal judgement.
- The views of community and priority groups must be actively sought throughout the process and decisions relayed to the groups as well as the rationale for the decision.
- Expert advice should be sought in any case where there is a perceived conflict in priority between groups that cannot be easily or fairly resolved.
- The safety and well being of people, based on evidence not assumption, is of paramount importance.
- In exceptional cases, where prioritising the needs of one group creates a negative impact for another, mitigating solutions must be found for the second group.

Criteria

Those issues or areas that will receive the greatest priority (in priority order) will be:

- work which enables CRL to fulfil its legal duties;
- work which removes or significantly reduces unreasonable risk to certain groups;
- work which is informed by the local demography and the researched needs of local groups;
- work which is considered important by the combined views of the communities themselves;
- work that can be partially resourced by third parties or significant additional benefit can be achieved because of third party partnership;
- work which has the greatest value and impact relative to the cost; and
- all work that can be conducted and completed for no or low cost.

Appendix 4 — key reporting stages

January 2006 – Equality Impact Assessment Main Report

December 2006 – Summary of Crossrail's Disability Impact Assessment

February 2007 – Amendment to Provisions (1-3) Equality Impact Assessment

August 2007 – Amendment to Provisions (4) Equality Impact Assessment

January 2008 – Public Consultation Comments and Crossrail's Response

Post Royal Assent – Equality Impact Assessment Update

May 2009 – Policy Equality Proofing report (continues to report to Executive Committee every 6 months)

Appendix 5 — related policies and documents

Inclusivity Policy Statement

Information Paper D21 – Access for People with Reduced Mobility During Construction

Information Paper E5 – Provisions for People with Reduced Mobility

Information Paper F1 - Inclusivity

Policy Equality Proofing – A guide for managers

Policy Equality Proofing – Initial Screening

Policy Equality Proofing – Full Impact Assessment Database

Policy Equality Proofing – Evidence Database

Equality Impact Assessment – Main Report 2006

Equality Impact Assessment – Amendment to Provisions (1-3) February 2007

Equality Impact Assessment – Amendment to Provisions (4) August 2007

Equality Impact Assessment – Public consultation comments and Crossrail's response