

Diversity Impact Assessment Guidance



Document verification



DIA Guidance
300 series
NR/GN/CIV/300/07
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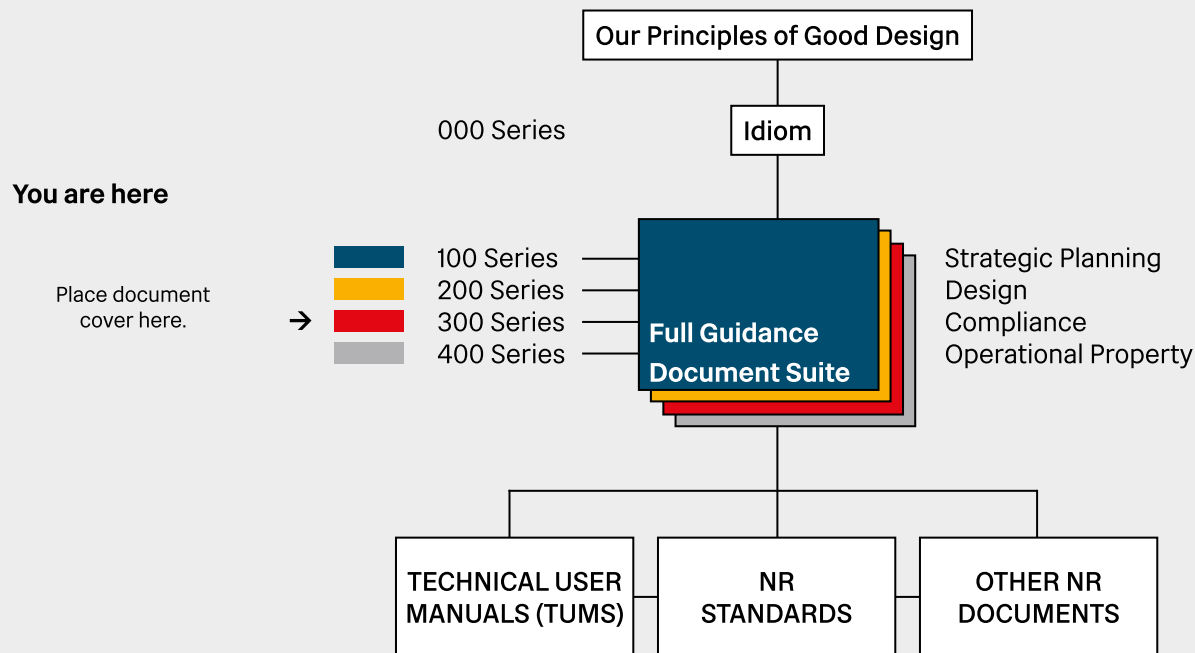
How to use the guidance suite



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The Network Rail Document Suite



References to other documents

- Code of Practice Guidance
- National Standard
- Network Rail document
- European Standard

Example

European Standard

PRM TSI: 4.4.1

"Information regarding the level of accessibility of all stations must be freely available. Operating rules shall be made to ensure that information regarding the level of accessibility of all stations is available."

A full list of relevant documents, and other guidance suite documents is contained in the appendix.

Figure 0.1 Network Rail Document Suite Summary

About this document



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The Network Rail's Diversity Impact Assessment Guidance presents Network Rail's requirements for the completion of Diversity Impact Assessments for projects, programmes and/or business changes. This guidance document supports the Diversity Impact Assessment Standard: NR/L2/OHS/00135



Section 1 DIA Requirements

Describes the benefits and requirements for undertaking a DIA.



Section 2 Document Guidance

Describes each of the 7 Steps process of completing a DIA.



Appendix Additional Information

Provides details of the DIA 7 Steps process and additional requirements for undertaking a DIA.

Image 1 Built Environment Accessibility Panel discussion



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Section 1: DIA Requirements

1.1 Foreword



We are pleased to be publishing this Diversity Impact Assessment Guidance document (NR/GN/CIV/300/07) which supports the business to deliver the requirements set out in the Diversity Impact Assessment Standard (NR/L2/OHS/00135).

The key purpose of a Diversity Impact Assessment is to assess the impacts of projects, programmes and business changes being undertaken across the rail network for customers and colleagues who belong to relevant protected groups.

This should support the business to deliver more inclusive and accessible projects or business changes and meet the legislative commitments and duties of the Equality Act 2010. This states that we are required to give due regard to protected groups who might be impacted by the work we do and to provide equal and inclusive access and experiences to the rail network for our customers and colleagues.



Image 1.1 Liverpool Street railway station with shared concourse area

Section 1: DIA Requirements

1.2 Definitions



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Term	Definition
Accountable Person	Is responsible for the delivery of a project or programme and has completed the Network Rail DIA e-Learning training.
Built Environment	This refers to any projects and/or programmes affecting structure or premise owned by the company including (but not limited to), stations, depots, offices, bridges, and lineside buildings.
The Built Environment Accessibility Panel	This is a panel of 10-15 members with considerable lived experience of disability and professional expertise in inclusive design and accessibility.
Business Change	Business change occurs when a business improves, restructures or transforms a major part of its operation causing disruption to systems, job roles and/or people.
Change Programmes	This is where there is a significant shift in a business' processes, culture, or other initiative to an alternative way of working.
Complex/ Large Scale Programmes	These programmes are likely to be delivered in stages over a longer period of time. They will have associated work activities/projects to be undertaken to meet the overall programme aims which will require individual DIAs to be completed throughout the lifecycle of the programme.
Consultation	These ask for or seek the advice, opinion, or information of someone or something. Consultation can involve talking over a situation or a subject with someone to decide points in doubt.
Data Protection Impact Assessment	This looks at how personal information and data will be used. It helps check that there is a lawful basis for doing so, and that the project team have followed the principles and mitigated any risk where possible.
Derogation	Is where an operator is unable to comply with the PRM NTSN (Persons of Reduced Mobility National Technical Specification Notice) standards, they should apply to the DfT for a derogation
DIA Author	A person who has been appointed by the accountable person for a project or business change, by or on behalf of Network Rail to create a Diversity Impact Assessment.

Term	Definition
DIA Reviewer (Previously known as DIA Super User)	A person who has been appointed by the DIA Author to independently review a DIA.
DIA Digital	Is an online platform that supports the life cycle of the DIA process. The project team should be able to create a DIA, share it with reviewers and other team members, collate and share supporting evidence and bank final document in one place.
Dispensation	Is where an operator is unable to comply with the Design Standards for Accessible Railway Stations, Version 04 – Valid from 20 March 2015 (DfT CoP), A joint Code of Practice by the Department for Transport and Transport Scotland in respect of works to a station, they should apply to the DfT for a dispensation.
Diversity	Is about taking account of the differences between people and groups of people, and placing a positive value on those differences.
Diversity Impact Assessment (DIA)	A structured information-gathering and decision-making tool which is used to assess and record the likely and/or actual impact of a current or proposed business change, project, policy, or function, on the protected characteristics and how negative impacts identified can be mitigated. NOTE 1: There are six different types of Diversity Impact Assessment: <ul style="list-style-type: none">a. The Built Environmentb. Events & communicationsc. Policies & Standardsd. Information Technologye. Change Programmesf. Procurement of goods and/ or services
Equality	Is about making arrangements so that everybody has an equal opportunity or is not discriminated against because of their characteristics.
Equality Act 2010	This law protects people from discrimination or unfair treatment on the basis of certain protected characteristics, such as Age, Disability etc.

Section 1: DIA Requirements

1.2 Definitions



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Term	Definition
Equality Impact Assessment (EqIA)	Equality Impact Assessment is the name of the assessment tool used by other public sector bodies or service providers such as Train Operating Companies (TOCs).
Equity	Recognises that each person has different circumstances and allocates the exact resources and opportunities needed to reach an equal outcome.
Events	Are things that happen or take place, especially one of importance e.g. a team away day, planned public or social occasion. These can be held in both company and non-company premises.
Freedom of Information Act 2000	Is a legislation that grants public access to documents or other data in the possession of a government agency or public authority, unless the information falls into a category that is specifically excluded from the terms of the legislation.
Inclusive Design	Inclusive design places people at the heart of the design process.
Known Inequalities	The uneven and unfair distribution of opportunities and rewards that increase power, prestige, and wealth for individuals or groups, social disparity.
Office moves/ relocations	Significant displacement of colleagues into new or temporary premises or the re-design of current work location.
People	Individuals who have the potential to be impacted by a project or business change for example, colleagues, customers and/or members of the public, such as lineside neighbours.
Policies	Is a set of ideas or a plan of what to do, in particular situations, that has been agreed to officially by a group of people, business function and/or business.
Project	A piece of planned work or an activity - an enhancement or a renewal, not a minor works intervention, inspection, survey, investigation type activity - that is finished over a period of time, with a clear beginning and end; which is intended to achieve a particular purpose.

Term	Definition
Public Sector Equality Duty 2011 (PSED)	The equality duty was developed in order to harmonise the equality duties and to extend it across the protected characteristics. The Equality Duty is supported by specific duties, set out in regulations which came into force on 10 September 2011. The specific duties require public bodies to publish relevant, proportionate information demonstrating their compliance with the Equality Duty; and to set themselves specific, measurable equality objectives.
Relevant protected characteristics	Are personal characteristics which are protected by discrimination law. Under the Equality Act 2010 (the Act) only the following characteristics are protected: <ul style="list-style-type: none">• Age (all ages are protected, not just older people)• Disability• Gender reassignment (a person who is, has or is proposing to, change sex, note it does not cover transvestites)• Marriage and civil partnership (does not cover single status)• Pregnancy and maternity• Race (includes colour, nationality and ethnic or national origins)• Religion or belief (or lack of religion)• Sex• Sexual orientation (includes orientation towards the same sex, opposite sex or either sex)
Renewals or Redevelopments	Renewal in rail refers to any major substitution work on a part of the rail network including systems that do not change the overall performance of the rail network whilst redevelopment refers to the demolition of old, redundant, or unfashionable buildings or infrastructure and the construction of new ones on the same site.
Temporary / Temporary Works	The elements of the construction that are needed to facilitate the construction of the permanent works and will, most often, be removed once construction is complete. Examples of temporary works include hoarding, scaffolding, propping, shoring and excavation support, falsework and formwork, cranes bases, signs, anchors, etc.
Strategies	Refers to a plan of action designed to achieve a long-term or overall aim.

1.3 Introduction



1.3.1 Purpose of this document

This guidance will provide information on when and how to complete a Diversity Impact Assessment (DIA). It will also provide detailed requirements of the 7 Step DIA process, information and access to the DIA Digital platform, roles and responsibilities and links to other useful information.

This process will help the project team to identify the actions required to improve performance, either by eliminating any potential or actual discrimination or disadvantage, removing or minimising barriers, or taking opportunities to promote equality and foster good relations.

DIA's can also increase the company's knowledge of customers and understanding of the potential barriers they face when accessing the rail network. This can present the team with new opportunities to increase revenue, grow the railway and enhance both safety and performance to deliver a better railway for current and future customers.

1.3.2 Scope

This guidance will outline:

- When a Diversity Impact Assessment (DIA) should be undertaken?
- How to determine whether a DIA is required.
- What support is available to help the project team complete a DIA:
 - An Introduction to DIA Digital.
 - Training available.
- Roles and responsibilities.
- What to do before starting a DIA.
- Reference information to be considered and/or included at each Step by DIA Type.
- Appendices.

1.3.3 What is a DIA for?

A DIA resembles a risk assessment; it is a process that:

1. Identifies any impacts a project and/or programme might have on protected groups of people.
2. Evaluates the level of the impact and associated risks.
3. Allows the creation of a plan to mitigate or remove the identified impacts and risks.

1.4 Benefits of DIA



1.4.1 Benefits of a DIA include:

1. Improved awareness of impacts on protected groups for current and future projects, programmes and business changes.
 2. Identification of likeliness and risks associated with impacts identified on protected groups.
 3. The availability of a prioritised action plan.
 4. Availability of trackable evidence of due regard by the company.
 5. Evidence to support budget decisions for current and future projects, programmes and business changes.
 6. Provision of evidence to support applications for dispensations where a non-exempt station scheme, undertaken by a licensed operator, cannot meet the European or national standards set out in the Design Standards for Accessible Railway Stations, Version 04 – Valid from 20 March 2015, A joint Code of Practice by the Department for Transport and Transport Scotland.*
 7. Provision of evidence to support applications for derogations where a non-exempt station scheme, undertaken by a licensed operator, is unable to comply with the PRM NTSN (Persons of Reduced Mobility National Technical Specification Notice).**
 8. Reduction of non-inclusive projects, programmes and business changes being delivered by the business.
- Undertaking a DIA will provide the ability to take into consideration any conceivable impacts affecting people who fall within one or more of the nine protected characteristics (Please refer to the [Definitions Table](#)).
- A DIA will help identify how a project or business change might positively and/or negatively impact upon colleagues and/or customers with 'Protected Characteristics'.
- For example:
1. Where a DIA identifies that a project, policy, plan or decision discriminates against one or more groups of people then reasonable adjustments should be considered and made to mitigate the identified discrimination.
 2. Where a DIA identifies that the work being proposed might not comply with DfT COP and/or PRM NTSN, an application for a dispensation or derogation might be required.

1.4 Benefits of DIA



1.4.2 Applying for a Dispensation or Derogation

An application for a dispensation or derogation should be made as early in the process as possible, and well before finalising designs, arranging finance, seeking planning and other consents (including station change), and well before any construction is commenced.

* For dispensations, applications are to be submitted on Code Dispensation Form A, which can be obtained, along with completion instructions, from the DfT Railways for All team at: railwaysforall@dft.gsi.gov.uk

Note: As part of the dispensation application process, projects should attend the Network Rail, Built Environment Accessibility Panel (BEAP). Refer to the BEAP Guidance which can be found on the Access & Inclusion SharePoint page.

** For derogations, please contact the Rail Technical Team at the DfT at: interoperability@dft.gsi.gov.uk

Where the proposed project does not significantly disadvantage people with a protected characteristic, if disadvantage is unavoidable, then the project should use the DIA to show that alternatives have been considered and the choices made are demonstrably justifiable.

Thinking inclusively when making decisions is the primary way of improving equality of access and equity. Undertaking DIAs promotes such thinking and embeds it into everyday organisational culture.

The DIA is a public document and can be requested by anyone who wants to understand our decision making (Freedom of Information Act 2000). For this reason, the DIA should be both comprehensive and easy to understand.

Image 1.2 London Bridge railway station example of passenger experience



1.5 Where to complete a DIA?



1.5.1 DIA Digital

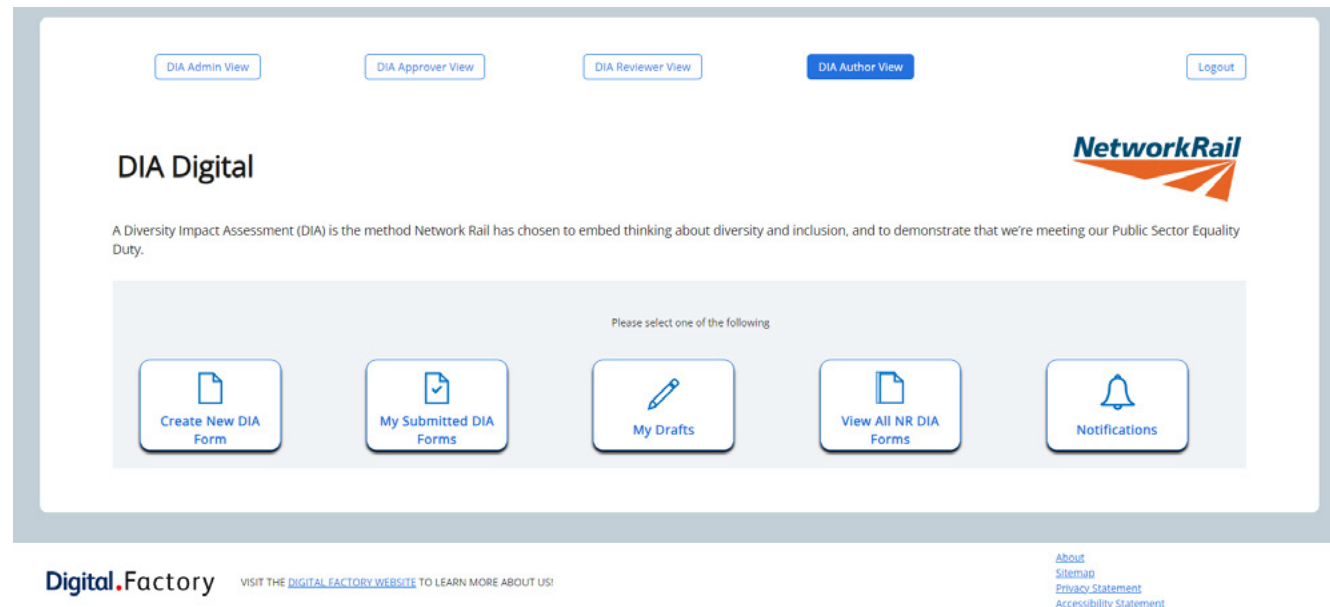
As well as this Guidance Network Rail have developed a new online tool called DIA Digital.

This platform allows creation of a DIA, sharing it with reviewers and other team members, collating and sharing supporting evidence and banking the final document in one place.

This new platform aims to streamline the DIA process for the business, and make documentation easily accessible. This tool can be accessed by 3rd party contractors who complete DIAs on behalf of a project.

Documentation on how to use DIA digital can be found on the Access & Inclusion SharePoint page.

Image 1.3 Main page of the DIA Digital tool



1.6 Learning and Development



1.6.1 Training

There are two specific training packages available to support people who are responsible for writing or reviewing a DIA, these are:

Diversity Impact Assessment eLearning

The purpose of the eLearning is to summarise the legislation and protected characteristics considered within a DIA.

- Identify the 7 steps to a DIA, and apply them when necessary.
- Describe the 6 types of DIA and classify examples.
- Locate where to get further information/help if required.
- Define a list of resources and when best to utilise them.

This eLearning is accessible to all employees and can be accessed via the learning portal at any time. Where an employee has been designated the role of:

- A DIA Author – this eLearning should be completed prior to the development of the DIA.
- A DIA Reviewer – this eLearning should be completed prior to undertaking the DIA Reviewer training.

1.6.2 DIA Reviewer Training - Face to Face or Remote with Facilitation (Full Day Course)

The learning objectives of the DIA Reviewer training are as follows:

- For Reviewers to understand the importance of their role and their contribution to helping fulfil Network Rail's obligations.
- To explore the 7 Steps of the DIA Process in detail.
- To give DIA Reviewers the knowledge and confidence to critique Diversity Impact Assessments.
- To practice how to give effective feedback to DIA Authors.

This training can be accessed by people who have volunteered to review DIAs on behalf of the business and have completed the DIA eLearning.

To find out how to access this training please go to the Access & Inclusion SharePoint page.

Other useful training includes but is not limited to:

- Disability Equality Training for all employees
- Everyone – Diversity and Inclusion eLearning

- Race Matters - Leading with Confidence, Fairness, Inclusion and Respect (Setting up an Inclusive Office)
- Inclusive Leadership

Image 1.4 Training available to assist with DIA completion



1.7 When to undertake DIA and when to review



1.7.1 When do I need to do a DIA?

A DIA should commence at the conceptual stage of proposed projects, programmes and business changes.

In the case of Built Environment DIAs, projects, programmes and business changes should be at the Strategic Development & Project Selection stage.

This will mean that people with protected characteristics are being considered at the outset.

1.7.2 Review

DIAs are live documents; this means that any alteration in scope and/or outputs of a project, programme or business change should result in a review of the DIA. Any further identification of impacts and/or associated mitigations should be recorded.

Built Environment projects or programmes following PACE should undertake a review of the

DIA at each Gate Stage. Undertaking assessments late can lead to:

- The inability to demonstrate due regard to the aims of the Public Sector Equality Duty (PSED) when decisions were made and this might leave the business open to legal challenge.
- The project delivering potentially discriminatory outputs which might adversely impact protected

groups of people.

- The inability to explore possible opportunities to advance equality, meaning that people with some protected characteristics might not benefit from the work to the same extent that others do.
- The project might not be effective in achieving more inclusive aims where due regard hasn't been given to all protected groups.

1.7.3 Will every project that impacts people require a full DIA to be undertaken?

No, not all projects or business changes will require a DIA. The following questions, though not exhaustive can help to determine the need for a DIA:

1. Does the piece of work affect customers, employees, or the wider community? NB: The relevance of the work depends not just on the number of those affected, but on the significance of the impact on them.
2. Is it likely to affect people with particular protected characteristics differently?
3. Is it a major project, significantly affecting how services are delivered?
4. Will the works have a significant impact on how our Train Operating Companies (TOCS) or stakeholders can operate?

5. Does the work relate to aspects of the services that have been identified as being important to people with protected characteristics?

6. Does the project relate to an area with known inequalities?

7. The outcome of the DIA business change or project should be proportionate and relevant in accordance with the Public Sector Equality Duty (PSED).

To help assess whether a project, programme or business change will require a full DIA "The Author" should complete Steps 1 & 2 of the DIA process (Appendix A) which should help to determine to what extent, if at all, the project, programme or business change impacts people and whether it is reasonable and proportionate to complete a DIA.

On completion of these steps, an independent review should be sought from the DIA Reviewer. This will support the ability to demonstrate that due regard to protected groups was made.

Where a project has decided that a full DIA is not required the Accountable Person, DIA Author and DIA Reviewer should sign off the decision. This is automatically recorded in DIA Digital.

Where a decision to complete a DIA cannot be agreed by the project team, Subject Matter Expert (SME) support should be sought, this may include engagement with the Access & Inclusion Team.

1.7 When to undertake DIA and when to review



There might be some instances where operational processes may be sufficient to evidence any impacts, risks and associated mitigations; negating the need for a full DIA to be undertaken.

Some examples of these may be:

- **Roster Negotiations** – Local roster negotiations
- **Overnight Station works** – Roof cleaning, fitting solar panels
- **Engineering Works (Track)** – The works being undertaken will not themselves require a DIA, however if alternative transport during these works is required, a DIA on providing this transport is likely to be required.
- **Painting an Office** - This would fall under Health & Safety legislation risk assessment process and CDM Regulations.
- **Team Meeting** – Internal meetings in NR Offices.
- **Policy/Procedure Changes** – Minor wording changes to a policy/procedure will not require a DIA, internal governance processes are in place to manage these types of changes.
- **Introduction of new online tool** – This tool only impacts a small known group of colleagues, which should be consulted and engaged with, and should be provided with adequate training and support.

1.7.4 Complex/Large Scale Programme DIAs

These programmes are likely to be delivered in stages over a longer period. They will likely have associated work activities/projects to meet the overall programme aims which might require individual DIAs. For instance, a programme delivering 2 stations and 2 footbridges requires 4 no. DIAs, as each project part has its own separate characteristics.

Where a DIA is required the full DIA - 7 Step process should be completed. Some common examples of when a DIA is required are outlined below:

- The Built Environment – renewals, temporary works, New Stations, Platform Extensions, new footbridges, new seating or changes to seating etc.
- Change programmes – reform programmes, reorganisations, transformation programmes, Timetable Changes.
- Policies and Standards – recruitment and Retention, Flexible Working, Customer Strategy, Rolling Stock.
- Information Technology (IT) - IT design, development, and enhancement projects for use by customers or staff.
- Procurement - of goods and/or services such as Contact Centre, Maintenance.

- Digital Experience - changes to the digital experience for customers and/or colleagues, via website and mobile applications.
- Retail and Ticketing – adding/removing types of ticket, changes to ticket channels, or eligibility criteria.
- Fleet and Engineering – introduction of new rolling stock, refurbishment and/or upgrade of existing rolling stock.
- Events and Communications – including conferences, virtual conferences, training courses and public consultations.
- Renewals – lifts and escalators, Customer Information Screens.
- Office moves/relocations – to another building or floor, could also include closure of building/ temporary works.

Note: This list is not exhaustive.

1.8 Roles and Responsibilities



1.8.1 Accountable Person

The accountable person is responsible for the delivery of a project or programme, which may be on behalf of a Route or Regional Direct. There may be more than one accountable person however it should be clearly identified who will be accountable for the delivery of the Diversity Impact Assessment/s.

The Accountable person should undertake the Network Rail DIA e-Learning training.

They will be accountable for:

- Assigning a DIA Author
- Making sure all steps of the DIA process are completed.

Responsible for and consulted on:

- The decision to Change the Work, Continue the Work, Justify and Continue the Work or Stop the Work; this step may require agreement of other senior roles such as Director etc.
- The agreement and subsequent delivery of the Action Plan.
- Signing off the finalised DIA.

1.8.2 DIA Author

The person has been appointed by the Accountable Person/s of a project or business change, by or on behalf of Network Rail to create a Diversity Impact Assessment.

This process can be, where appropriate, carried out by an external third party such as an Access Consultant or Programme Manager.

It might be useful for the author to consider appointment of a subgroup of diverse people to support development of the DIA; this would be particularly helpful for complex projects and/or business changes.

Authors should complete the Network Rail DIA e-Learning training prior to creating a DIA on behalf of a project and/programme

They will be responsible for:

- Creation of the DIA – All steps including Sign off.
- Requesting/Appointment of a DIA Reviewer.

1.8.3 DIA Reviewer

The person appointed by the DIA Author to independently review a DIA.

A DIA Reviewer may be within the same team but not be involved in the DIA creation/ production/ writing (to provide independence and objectivity).

Reviewers should have completed both the DIA e-Learning and the DIA Reviewer training so they have the required skill level to confidently assess a DIA.

1.8.4 Access & Inclusion Team

This team are subject matter experts appointed by the organisation to promote, deliver and support accessibility and inclusion improvement initiatives that will benefit customers, colleagues and stakeholders.

They will provide support and guidance to project teams, DIA Authors and/or Reviewers throughout the DIA process as required.

They will also hold drop-in sessions for DIA Reviewers to discuss any queries or concerns they may have during DIA reviews.

1.9 Completing a DIA



1.9.1 Identify the Accountable Person

Identify the “Accountable Person” for the project, programme or business change. This should be someone who will be accountable for the delivery of the project and/or programme for the medium to long term, who will take responsibility for regular reviews. This may be a manager, Sponsor, Head of Department and/or Director as appropriate.

1.9.2 Identify the DIA Author

Identify a suitable author - the “DIA Author” - responsible for the completion of the DIA, who will also be responsible for engaging with the reviewer.

1.9.3 The DIA Reviewer

The appointed/identified reviewer, the “DIA Reviewer” will offer guidance during the development of the DIA prior to it progressing to the sign-off stage. They will also be responsible for signing off the DIA on completion.

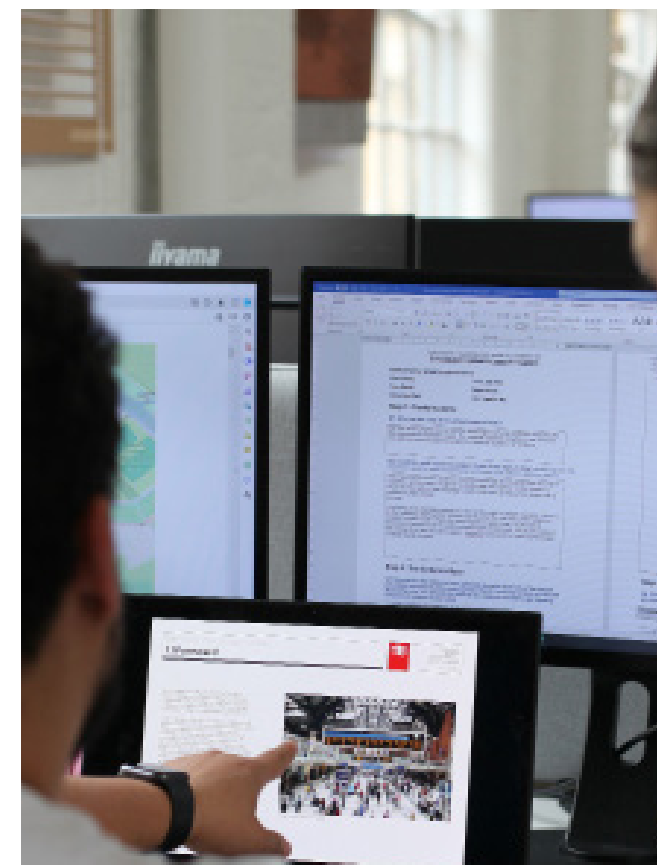
1.9.4 DIA Signatories

The project team should familiarize itself with the DIA Digital training requirements and assign sufficient time to complete the DIA. The time spent on a DIA should be proportionate to the size of the project, policy, plan, or decision being undertaken.

At this stage a working group may be created to support consultation (Step 4). This group should not include the DIA Reviewer as they will provide independent advice and level of detail required.

For Built Environment DIAs, Buildings and Architecture design guidance - Network Rail and the DfT Code of Practice: Design Standards for accessible railway stations should be followed. Other relevant Network Rail standards can be found in [Appendix C](#).

Image 1.5 Training available for the DIA Authors



Note:

For more information on DIA digital and more please go to the Access & Inclusion SharePoint Page.

1.9 Completing a DIA



1.9.5 Use of Language

As a public sector arm's-length body, there is a duty to eliminate discrimination, advance equality of opportunity, and foster good relations between different people. One way this is done is by using the right terms. It shows the business respects, understands and values all audiences.

Moreover, if not done, the language used can create and reinforce bias against individuals and groups of people. It can also create and reinforce negative stereotypes.

A Diversity Impact Assessment might be read by anyone, meaning that audiences are socially and culturally diverse. The language used to communicate with people and about people, should reflect that.

1.9.6 People use a variety of tools

Just as people use physical aids like glasses, hearing aids, wheelchairs and walking sticks, many also use aids to help with comprehension.

- Web browsers have settings to increase font size or change colours to make text more legible.
- Screen magnifiers let people make interfaces bigger.
- Screen readers convert text to audio so that people who can't see can hear content instead.
- Speech recognition software lets people use a computer without using their hands.

It's worth bearing this in mind when writing a DIA.

1.9.7 Abbreviations and Acronyms

The business should communicate in the clearest possible way, and abbreviations can be confusing for people who aren't in the know. So abbreviations like Network Rail to NR (or anything else) are not encouraged.

General use of acronyms should be avoided unless they're universally recognised, like BBC, MP, FAQs. If the use of acronyms is required, it should be spelled out when used for the first time, and then put in brackets afterwards without putting full stops between the letters.

For more information go to the Access & Inclusion SharePoint page.

Section 2: Document Guidance





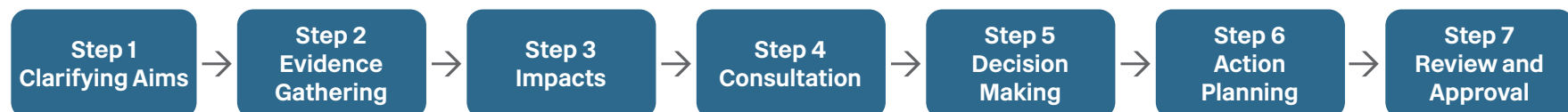
Be wary of making overly positive or overly generalised conclusions during the assessment. For example, if the team concludes that a new station design will universally benefit all passengers without any evidence to support that conclusion it may be difficult to demonstrate compliance with the Public Sector Equality Duty.

Remember that a Diversity Impact Assessment (DIA) helps to identify, and mitigate against or remove, negative effects. It is also an opportunity to identify ways to advance equality of opportunity and foster good relations. This may involve building innovative or creative solutions into the project at the design stage and/or during the preliminary stages of the project.

Refer to [Appendix A](#) for the 7 Step Flow Chart.



Image 2.1 Accessible Gateline



Section 2: Document Guidance

Step 1 - Clarifying Aims



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This step is to establish how the objectives of a piece of work relate to the three aims of eliminating discrimination, fostering good relations between different people, and advancing equality of opportunity.

The project team should think about the purpose of the project, the context in which it will operate, who it should benefit, and the intended results.

Type of DIA	Guidance
For all types of DIA	Define the scope and extent of the project and the disciplines / assets associated with the project. This should set the limits of the scope of the impact assessment.

Type of DIA	Guidance
Built Environment	Using descriptions will facilitate a more open assessment, e.g., the aim would be 'to provide a safe route for people to cross the railway' rather than 'Build a footbridge' as this assumes the solution from the outset.
Events and Communications	Define the scope of the event/training e.g. is it a single event or recurring?
	Who are the intended audience/participants if known, if not known assume that all protected characteristics will be attending? This should set the limits of the scope of the impact assessment.
	Are the premises/venue if known accessible by everyone? If not known the DIA Action plan should state that the accessibility of the intended venue will be checked as part of the selection process.
Policies & Standards	Define the scope of the policy/standard e.g. is it new or a revision? Is this a policy that affects everyone? If not, describe for whom it is intended. This should clearly set out the limits of the scope of the assessment.

Type of DIA	Guidance
Policies & Standards	Using descriptions will facilitate a more open assessment e.g., the aim would be 'review xxx policy' in light of legislation changes rather than 'change policy' as this assumes the need for change.
	When a standards project remit is prepared affecting a document in Network Rail's standards and controls framework, the Standard Change Lead should act as the DIA Author and complete the DIA. The DIA Reviewer should be someone who is familiar with the subject matter of the standard and control document. The Accountable Person for the DIA should be the Standard and Control Document Owner.
Information Technology (IT)	Using descriptions will facilitate a more open assessment e.g., the aim would be 'Provide an IT solution to deliver and creation of the Exec Report ...' rather than 'apply xxx software to deliver an Exec Report' as this assumes the solution from the outset.
Change Programmes	Using descriptions will facilitate a more open assessment e.g. the aim would be 'to improve effective storage of materials' rather than 'remove storage racks as this assumes the solution from the outset.
Procurement of Goods and/or Services	Using descriptions will facilitate a more open assessment. This will assist future communication of the procurement

Section 2: Document Guidance

Step 2 - Evidence Gathering



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When gathering evidence, here are some examples of what and where the project team may seek evidence depending on the scope of the project and/or programme:

- Human Resources Department information on workforce data
- Staff forums and surveys; Customer surveys and complaints
- Local councils – for population data and insights into the regional diversity.
- Office of National Statistics – for information about local populations
- Businesses and charities who work with and represent people who share protected characteristics.
- Research relevant to proposed project such as – ORR, RSSB, DfT, Motability Research

Type of DIA	Guidance
For all types of DIA	Consider what evidence exists in relation to the project or piece of work, and those issues where we need to be more inclusive.
	Look at existing evidence, research, and data/statistics.
	Consider conducting surveys where possible to capture some general concerns by groupings from empirical data.
	Are any groups under-/over-represented, or are there barriers to their access resulting in exclusion?

Type of DIA	Guidance
Built Environment	Consider local issues such as demographics, amenities, and development plans as well as data from the UK Census. Local authorities will often have such information in their Local Plans (both quantitative & qualitative).
	Consider all groups, and if there is no data available for certain groups then mention what sources the team has tried
	Use statistics and easy-to-read graphs to compare demographics e.g. the local areas compared to regional or national averages.
	Looking at the number of children aged 1–5 can give an indication of the birth rate when looking for pregnancy or maternity statistics.
Events and Communications	Consider the likely audience and gather protected characteristics statistics from HRSS or National Census if members of the public are expected to attend.
	Use statistics and easy to read graphs to compare demographics e.g. the local areas compared to regional or national averages.

Type of DIA	Guidance
Events and Communications	Consider local issues such as demographics, amenities and other relevant matters such as transport availability
Policies & Standards	Consider the likely users including contractors or passengers and local people who may be affected and gather protected characteristics statistics from HRSS or National Census (local breakdown) as required.
Information Technology (IT)	Consider local issues such as demographics, amenity and development plans as well as data from the UK Census if the solution may be used by others outside the company.
Change Programmes	Consider local issues such as demographics, amenity and development plans as well as data available from HRSS.
Procurement of Goods and or Services	Consider local issues such as demographics, amenity, and development plans as well as data from the UK Census.



Impacts of a project can be both positive and negative. Exploring impacts of a project is an essential element within the DIA process, allowing the project to demonstrate that potential impacts have been considered and noted.

Explain the negative impacts on each protected group/characteristic, as relevant, and record potential mitigating actions.

Remember that a DIA helps to identify, and mitigate against or remove, negative effects. It can also

provide an opportunity to identify ways to advance equality of opportunity and foster good relations. This may involve building innovative or creative solutions into the project at the design stage and/or during the initial stages of the project.

Type of DIA	Guidance
For all types of DIA	Could the work unintentionally have a negative effect on groups protected by the Equality Act?
	Is this negative impact likely to be worse for specific groups?
	Could the work have a positive impact on those protected by the Equality Act?
	Could some groups or communities be excluded from the benefits of the work?
	How could the work help deliver our diversity and inclusion objectives?
	Could this project improve community relations for either our customers or non – rail users such as lineside neighbours?
Type of DIA	Guidance
Built Environment	Is there a focus on reducing barriers for a specific group e.g. disabled people?
	Is the work breaking or creating links between parts of a community e.g. <ul style="list-style-type: none"> • Housing and a hospital? • A station and a school? • A residential home and the doctor's surgery? • A community and its place of worship? • A school and a playing field? • A housing estate and the bus stop?



Consultation can often identify potential negative impacts and potential solutions that the project team may have missed, especially if the process itself is accessible, inclusive, and transparent.

Think about the accessibility of communications used to promote the consultation e.g. format compatible with screen readers, using Alt text if using images etc.

Think about location, timing and format of the consultation event, so that the project team can gain a wider range of opinions.

Once any consultation has taken place, consider how the team will support the participants to provide feedback and inform those consulted about the outcomes.

There are different options for consultation including (but not limited to):

- The Built Environment Accessibility Panel (BEAP) for major or complex Built Environment projects.
- Local authorities for details of development proposals.
- Local community groups especially those affected by work.
- Local disability forums for more specific consultation.
- Subject matter experts for detailed specific information.
- Internal Stakeholders e.g. Sustainability Team, Human Resources etc
- Employee Networks for internal projects.
- Design Advice Panel (DAP).
- Wider public groups.
- Town Hall Briefings.
- Local Passenger Groups.
- TOC Passenger Advisory Groups.
- Disabled Persons Transport Advisory Committee (DPTAC).
- Postal Surveys.
- Online Meetings.
- Surveys.

Type of DIA	Guidance
For all types of DIA	Consulting works best when the project team has something to propose, but before major decisions have been made.
	The consultation should focus on talking to those protected by the Equality Act and most likely to be impacted.
	The project team should consider carrying out a joint consultation with another project, e.g., Train Operator etc in the same geographical/business area?
	Early consultation can look at barriers and solutions while later consultation can focus on detail, e.g. fixtures and fittings associated with inclusive design.
	Be clear about what aspects of a project is being consulted on, so that staff/non- users of rail and customers consulted can make useful contributions without making suggestions that are not possible or safe.

Image 2.2 BEAP session in hybrid format





Having completed steps 1 – 4 of the DIA 7-step process, the project team should now be able to decide on how to progress the project which should include one of the following:

1. Change the work - mitigation against potential negative impacts is required.

2. Continue the work – no potential negative impacts found.

3. Justify and continue the work despite negative impacts – provide justification.

4. Stop the work – discrimination is unjustifiable and there are no obvious ways to mitigate.

Type of DIA	Guidance
For all types of DIA	1. Change the work. This is the most likely outcome and involves making changes to the work so that it does not adversely affect certain groups of people or miss opportunities to affect them positively. This can involve taking steps to mitigate negative impacts, or to bolster positive ones. It is lawful under the Equality Act 2010 to treat people differently in some circumstances, such as not charging for Blue Badge parking where others should pay. Document the reasons for the steps the project is adopting and the information used to make this decision.
	2. Continue the work. The assessment demonstrates that the work shows no potential for discrimination and that the project has taken a proportionate approach to advancing equality of opportunity and is fostering good relations between people with different protected characteristics. The team should document the reasons for this conclusion and the information used to make this decision.

Type of DIA	Guidance
For all types of DIA	3. Justify and continue the work despite negative impacts. There may be other factors (such as policy aims or financial constraints) which make it reasonable for the project team to decide to adopt the policy or approach despite its adverse impact on diversity and inclusion. The team can choose this option where the project does not unlawfully discriminate, or where any potential discrimination is indirect and can be objectively justified. The team should take into account the possibility that the decision could be legally challenged, and consider whether the project would be able to satisfy a court that there was due regard to the aims of the general equality duty when the project team reached the decision. It is particularly important that the reasons for the decision and supporting evidence are documented.
	4. Stop the work. If analysis of the project shows a high probability of unavoidable discrimination, which cannot be objectively justified, consider re-scoping the project using an alternative approach to avoid legal challenges under the Equality Act 2010. Document the reasons for this decision and the information used to make it.

Step 6 - Action Planning



Following the completion of Step 5 of the DIA Process, an action plan should be created. The actions in this plan should address any potential negative impacts that have been identified at 'Step 3'.

The plan should summarise the key activities required, responsible people and delivery timelines.

At this stage it would be recommended that an initial review of the proposed action plan is endorsed by the Project/Programme Sponsor and/or Accountable Person prior to Step 7 (Review and Sign Off), to make certain the proposed actions can be delivered.

Type of DIA	Guidance
For all types of DIA	Even minor changes to the original plan should be included in the action plan.
	Consider creative and innovative actions to enhance positive impacts.
	Remember, reasonable adjustments for disabled people should be made.
	Add in any actions that arise as a result of consultation.
	Be realistic about who can take the action forward and any dates.
	Remember, DIAs are subject to the requirements of The Freedom of Information Act 2000 and The Freedom of Information (Scotland) Act 2002 meaning that: <ul style="list-style-type: none">· Public authorities are obliged to publish certain information about their activities; and· Members of the public are entitled to request information from public authorities.

Section 2: Document Guidance

Step 7 - Review and Sign Off



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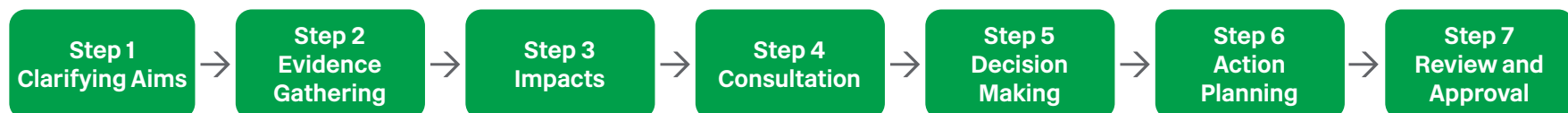
The Accountable Person, Author and Reviewer should undertake a final review prior to signing the DIA.

The Accountable Person will have overall accountability for the delivery of the Action Plan and future reviews throughout the lifecycle of the project/programme.

Once all signatures and approvals have been completed the DIA is stored in the DIA Digital Platform (Refer to DIA Digital Process).

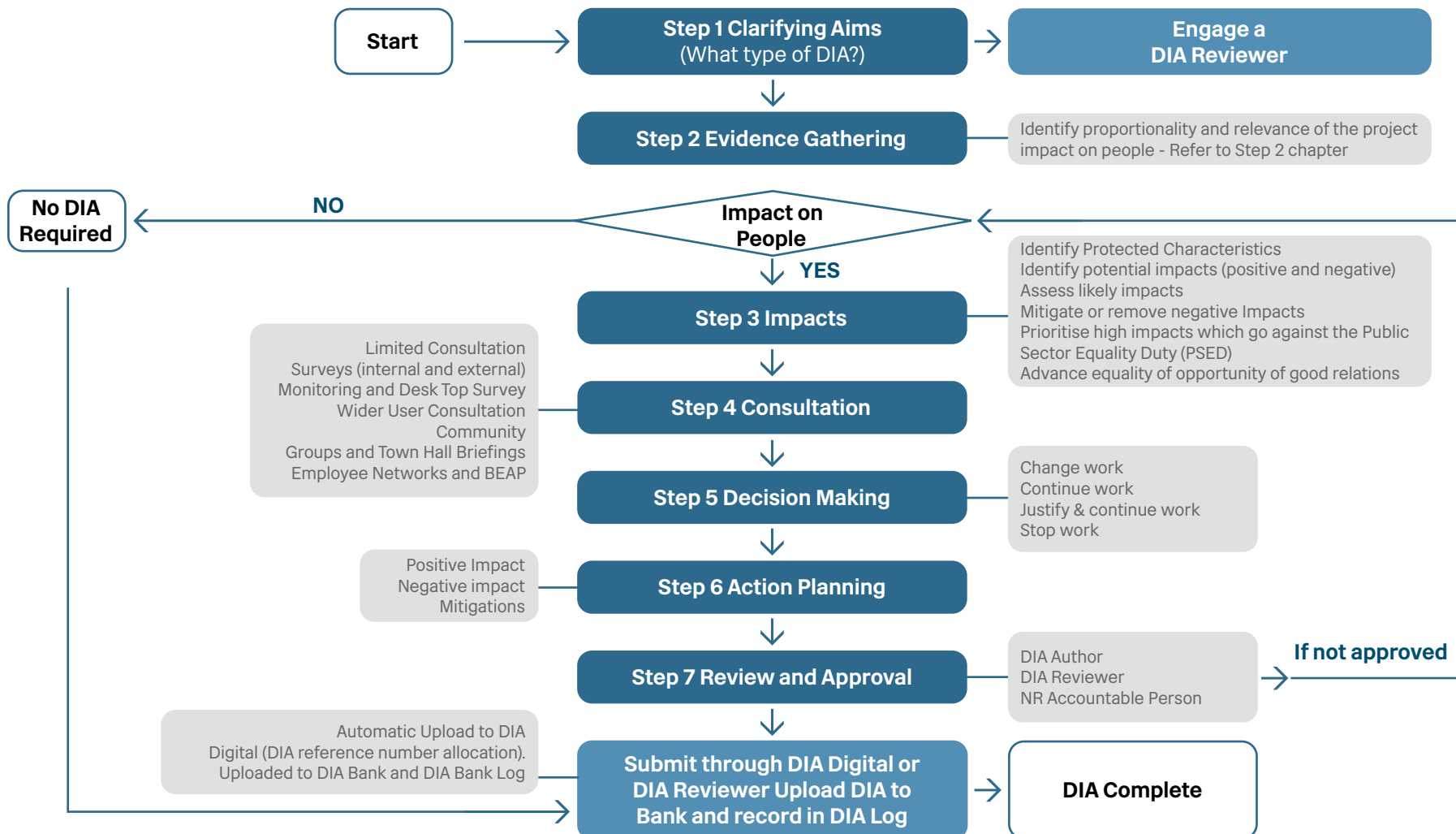


Image 2.3 Paddington station example of inclusive public realm design



Appendix





Summary of 7 Step DIA Process



Step 1 - Clarifying Aims

Briefly summarise the aims, objectives and/or purpose of this project/piece of work.

Key Questions:

- What is the project?
- What is the goal of completing this project?
- What is the rationale and/or driver for doing this project and what does it offer Customers and business?
- Think about what the projects wants to achieve – not necessarily the details of the change itself.

Step 2 – Evidence Gathering

In this section, the team should record the data and research about the diversity of the people potentially impacted by this work.

Sources

Information could come from several sources, which may include:

- Consultation information gained through consulting groups or organisations that has led to this work being undertaken
- Previous Diversity Impact Assessments (DIAs) that may have been completed internally or externally
- Demographic Information from the national census – either national or local, Office for National Statistics, or the Human Resources Team
- Passenger Assistance Data relating to specific disabilities, assistance cases on trains and at stations, and delivery data over time
- Customer Feedback Data - customer complaints or comments, voice of the customer data, social media interest or press stories
- Anecdotal or Other Evidence and any other information or consultation consider important.

Include where the project feels there are gaps in the information.

Examples of considerations for a DIA

Please be aware that these are not extensive - different factors will need to be taken into account for each project. These are just some of the things should think about for each characteristic while completing the DIA.

Gathering information

Consider any existing information/data that the project has gathered including any consultation outputs from different groups with protected characteristics.

Include any information or research that supports the need for this project and gives information about the people and areas that will be impacted by the project.

Remember to evaluate all the protected characteristics.

Summary of 7 Step DIA Process



Protected characteristic	Consideration
Age	Have generational differences been considered?
Colleagues and customers of different ages or generations	Are activities accessible for all ages?
	Have differences in learning and working styles been considered?
	Is the activity technology dependent (e.g. are email addresses needed)?
Disability and/or caring responsibilities	Do changes proposed affect visual access (colours used, option to zoom, size of font)?
	Have subtitles been considered?
	Is a space accessible?
Disabled colleagues and customers, including those with mental health problems, or those with caring responsibilities	Can spaces be altered?
	Is imagery representative?
	Has flexibility been considered?
	Have differences in learning styles been considered? Is travel required?
	Is travel accessible to all?
	Are there alternative accessibility options?
Marriage or civil partnership	What personal details does the project team need to take? And titles/ relationship indicators necessary

Protected characteristic	Consideration
Pregnancy and maternity	Has flexibility been considered?
Race	Is imagery representative?
Colleagues and customers from different ethnic background	Consider the language used - should alternative formats be provided?
	Have representative demographics been used?
Religion or belief	Is imagery representative?
Colleagues and customers with different religions and/ or beliefs	Consider the language used - should alternative formats be provided?
	Have representative demographics been used?
Sex and gender reassignment	Have inclusive pronouns been used?
Cisgender, transgender and non-binary colleagues and customers	Have representative demographics been used?
	Is the project perpetuating stereotypes?
Sexual orientation	Is imagery representative?
LGBT + colleagues and customers	Has inclusive language been used?

Step 3 - Impact

Does the final aim or outcome of the work have potential impacts on people (including staff and customers)?

Will staging or temporary works during delivery have potential impacts on people (including staff and customers)?

If YES, briefly explain how this work could affect people, considering our duty to promote equality, tackle discrimination and foster good relationships between groups.

Consider who may be impacted – e.g. staff, customers, contractors, general public etc.

If NO, the project should supply a summary statement outlining why this project doesn't impact colleagues, customers or protected characteristics.

Summary of 7 Step DIA Process



Assessing positive and negative impacts

Refer to the table on the right and think about the negative impacts that could arise from the project for each protected characteristic. Some negative impacts may apply to more than one protected characteristic due to intersectionality.

Fear of crime is a recurrent theme for some protected groups. Consider how to mitigate this – location, good lighting and access to public transport might help.

Not all people who share a protected characteristic will experience disadvantage.

The positive impacts

Positive impacts might include things we do already to improve and promote accessibility across different protected characteristics.

If any of these examples apply to the project, the project should expand on them to make the examples relevant to the situation.

Protected characteristic	Potential negative impacts	Potential positive impacts
Disability	Impaired person will not be able to read signage	Step free access for those with physical impairments
	Wheelchair user won't be able to access a new facility	Audio information is useful for people with visual impairments as they do not need to go to the area where information is written, nor have to read if they have difficulties reading
Age Consider both older and younger people	Older people may have a fear of crime, e.g., poorly lit spaces could play to this fear	Well lit spaces benefit everyone with a fear of crime
	Younger people may not be confident travelling on a different route	
Pregnancy/ maternity	Longer journeys can be difficult for pregnant women	Policy improves parental leave provision
	No availability of seating and/or toilets	Additional seating
Race	Signage not clear to people with English as a second language	Simple language or symbols on signs
	Fear of crime	Good lighting, emergency contact points
Religion or belief	Needing to have to travel on days of religious significance because of timetable changes	Good notice given of timetable change and an awareness of religious holidays calendar when planning work or closures
	Cheap fares or other offers only on days of religious significance	
Gender	Fear of crime, no staff presence	Good lighting, emergency contact points
Sexual orientation	Fear of crime	Company celebrates/ supports Pride events to show organisational inclusivity of LGBTQ+
	Employee thinking that bullying, harassment or isolation might occur if they disclose that they are gay, lesbian, bisexual etc	

Summary of 7 Step DIA Process



Protected characteristic	Potential negative impacts	Potential positive impacts
Marriage/ civil partnership	Cancellation of wedding because of unforeseen circumstances. Leave booked, no longer required	Process for cancelling leave in this situation
Gender reassignment	Fear of crime	Improved lighting and CCTV to improve safety/ reduce crime
	Reduced mobility because of surgery	

Step 4 – Consultation

Internal and external source

Who has the project consulted to make an informed decision?

Has the project team consulted people/organisations representing groups with protected characteristics to understand their perspectives, and/or the relevant experts in these areas? This could include employees across the network, specialist contractors or subject matter experts, local disabled persons' organisations, or other groups affected by the changes.

Does the team understand the issues raised regarding any legal risks or restrictions that might impact what they are doing?

The amount of consultation required should be proportional to the size of the project. If the project is complex/high profile and likely to significantly impact on the community, consultation should be significantly more extensive than what is required if it is simply planned to repair a building's access route, for example.

Consultations with other teams delivering similar or overlapping work should be recorded as this should assure that the solutions are joined up.

Other Consultation Sources

Organisational customer panels or advisory groups are useful – some of the contacts the project team acquired whilst collecting evidence should be used, and if appropriate, hold a focus group.

There may be someone in the project team organisation who runs focus groups on a regular basis.

If not, the council or local organisations working with protected groups might be able to help.

Summary of 7 Step DIA Process



Step 5 – Informed Decision Making

Having completed this DIA, what are the next steps? Please select one of the following, the four choices are:

- 1. Change the project:** carry out some or all of the mitigations that were identified in Step 3: Impact and also make changes to advance equality of opportunity. Again, outline here what changes are made to mitigate negative impacts.
- 2. Continue with the project:** the DIA has demonstrated no reasons why the project should not continue.
- 3. Justify and continue the project:** there are some adverse effects for some groups sharing protected characteristics, however there are other compelling reasons why the project should continue. If this is the selected route, it is important to document exactly the thought process the team went through. The DIA could be a public facing document and some people might not like the decision, so it is vital for the project team to show how they arrived at the decisions.
- 4. Stop the project:** if delivering the project is going to cause significant discrimination, then it is time to think again. An alternative way might be found to meet the original aim and if the project is near completion the team might need to take legal advice.

The project team should consider if the project is likely to have an adverse effect (i.e. discriminate against) on a significant number of people who share one or more protected characteristic.

Consider the degree of discrimination that might result - is it minor or significant?

When making decisions about the project, it is important to put the results from the DIA into the decision-making process alongside other key factors such as budgets, and organisational aims and commitments.

Step 6 – Action Planning

Next Steps

What specific actions will be taken to deliver positive impacts and address any potentially negative impacts identified?

If the team has decided to **continue the project** and risks have been identified, how is the team planning to mitigate them prior to and after the project launching?

The DIA should be a 'living document' that the team continues to **update** in line with the actions and review criteria for the project particularly on any projects related to the Built Environment who are using PACE.

Someone **should be accountable** for making certain that all mitigations listed are completed prior to the go-live date.

What specific actions will be undertaken as a result of this diversity impact assessment?

The action plan provides the record of how the project is going to mitigate the negative impacts identified as part of the DIA process, as well as any additional activities which the team is going to undertake within the project to foster good relations and to advance equality of opportunity.

The DIA Accountable Person should review the document periodically.

Once a project starts, it is recommended for the project team reviews how the mitigations are working in practice. The real impact of the work can only be known once the project is live.

Reviews might reveal further mitigation opportunities or further mitigation requirements, as a result of population changes, for example, or perhaps through the development of new, more successful ways to remove barriers for those sharing protected characteristics.

Set a review timetable in the action plan.



Please find links to other information that could be referred to or be useful when completing a DIA below:

- DIA Standard (NR/L2/OHS/00135)
- Built Environment Accessibility Panel (BEAP) Guidance.
- Technical User Manual for Non-station footbridges, non-canopy station footbridges and up to 16m footbridges - NR/CIV/TUM/400
- Technical User Manual for Station Footbridges - NR/CIV/SD/TUM/4000
- Station Design Guidance - NR/GN/CIV/100/02
- Station Design Manual - NR/GN/CIV/200
- Station Capacity Planning - NR/GN/CIV/100/03
- Station Facilities & Amenities - NR/GN/CIV/200/03
- Public Toilets in Stations - NR/GN/CIV/200/04
- Parking & Mobility at Stations - NR/GN/CIV/200/11
- Station Wayfinding Design and Assurance Procedure - NR/L2/CIV/150
- Customer requirements for the provision of train running information on stations -NR/L2/OCS/060
- <https://www.gov.uk/guidance/equality-act-2010-guidance>
- <https://www.equalityhumanrights.com/en>
- <https://ico.org.uk/for-organisations/foi-eir-and-access-to-information/guide-to-freedom-of-information/what-is-the-foi-act/>



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