

Proposal name	Introduction of face coverings (TfL)					TfL Modes Impacted												
Proposal contact details	Name:	xxx	Email:			Please place a tick (✓) in the box below for all of the TfL modes affected												
D&I contact (will be identified when feedback is given)	Name:	xxx	Email:		Phone:		Buses	LU	LO	TfL Rail	DLR	Trams	TPH	LRS	EAL	Cycle Hire	Streets	D-a-R
REqIA number and stages record (allocated by D&I)	Number:	6	Stage:	C	Version:	1	✓	✓	✓	✓	✓	✓	✓	✓				✓
Key dates	Date submitted	16.06.20	SISG review		IDAG review		D&I review and response		10.06.20									

Reviewers	Job title/team	Date reviewed
xxx	Change Project Manager	
xxx	Customer Experience	
xxx	Customer Experience	
xxx	Head of Ticketing,	
xxx	Customer Experience	
xxx	TfL Occupational Health	08/06/2020

Information from	Job title/team

Other TfL projects that affect, may be affected by or link

Any other relevant information

From 15th June 2020, government rules mandate the wearing of face coverings on public transport - until that date the wearing of face coverings has been strongly advised but has not been mandatory. There are exemptions which have been specified publicly.

<https://www.london.gov.uk/coronavirus/face-covering-guidance> states:

Some people who should not wear a face mask, they are:

- People who have trouble breathing
- Children under 3 years old
- Anyone who finds it difficult to manage them correctly

Young children should have adult supervision when wearing a face covering

<https://www.gov.uk/guidance/coronavirus-covid-19-safer-travel-guidance-for-passengers> states:

Some people may not be able to wear a face covering, for example young children, people with breathing difficulties and people whose disabilities makes it difficult for them to wear a face covering.

LU staff have been given face masks and encouraged to wear them, however it is not mandatory, not will it be following the 15th June change for the public. This is because the change in rules for customers forms part of the Conditions of Carriage agreement which does not apply to staff. Staff will continue to be encouraged to wear face coverings to ensure safety in the workplace.

LU staff have been given guidance to not remove their face masks in order to better communicate with customers - LU staff briefing note on accessibility

LU staff have been instructed not to enforce mask wearing amongst the public.

3 million face masks are being distributed to customers from 8th June 2020 at LU gateway and destination stations. Distribution is "passive" in that customers are given the opportunity to take one rather if they choose and they are not being actively thrust upon them. Uptake has been extremely high. A TfL leaflet outlining how to make your own mask is planned for distribution following on from the free mask hand out phase.

Amendments to the exceptions will be made as necessary to ensure that it is in-line with Government advice

Proposed change	Impact positive (P) or Negative (N)	Impact number	Potential impact for customers or staff	Mitigations/recommendations	Mitigation Implementation			Implementation Explanation	Residual risk	Mitigation communicated with staff		Mitigation communicated with public		Ongoing Monitoring and responses
					None	Partial	Fully			Y/N	How?	Y/N	How?	
Face coverings are mandatory for customers on public transport	N	1	General customer impact: Some customers may face barriers to wearing face coverings	Recommendation: Ensure staff are aware of the specific limitations facing some customers (outlined in further specific impacts below) to enable them to have more informed conversations with customers if there are queries Recommendation: Communicate the fact that there are exceptions clearly to customers and staff so that the "ask" is clear. Amendments to the exceptions will be made as necessary to ensure			✓	MMc created staff briefing for LU station staff, reminding of exemptions broadly with the following wording: "Please remember that there are exemptions for people who have trouble breathing; children under 3 years old and anyone who finds it difficult to manage them correctly." This is an acceptable broad briefing.						
	N	2	Specific impact: Some customers with mobility impairments may find it difficult to put on and adjust face coverings themselves e.g. they have limited mobility or no hands	Recommendation: Work with stakeholder groups to ensure the guidance regarding what people should do on public transport is as clear as possible			✓	Stakeholder communications creating a TL line explaining exemptions are in place and that staff have been briefed. Emails will be sent to relevant groups, and stakeholder comms are responding to questions we receive.						
	N	3	Specific impact: Some customers using ventilators, might not be able to wear a face covering and may be using an alternative measure.	Recommendation: Work with stakeholder groups to ensure the guidance regarding what people should do on public transport is as clear as possible			✓							
	N	4	Specific impact: customers with visual impairments may not be aware of the appropriate point to put the face covering on (e.g. when social distancing is no longer possible)	With a blanket government rule that face coverings are mandatory on public transport, these customers should find it easier to comply with the requirement as determining when they enter a public transport environment is easier through environmental cues than it is to determine when social distancing is no longer possible Recommendation: LU should provide audio reminders over PAs whenever possible at regular intervals, the rule applies to everyone at all times.			✓	Draft PAs in progress to remind everyone.						
	N	5	Specific impact: Customers who rely on lip reading to communicate find it difficult to understand LU staff	1. LU staff have been briefed that they are not to remove face coverings to talk to customers (18 May). Guidance on alternative ways to communicate has been shared with LU staff i.e. pen and paper/whiteboard or on a device (but not passing it to and for) 2. Work with stakeholder groups to explain our guidance, and explain that this is to protect everyone's health 3. Consider transparent face covering options. A trial of visors is underway. We await the conclusion.			✓							
	N	6	Specific impact: customers with cognitive or learning impairments fail to understand the "new" rules regarding face coverings or find wearing one distressing	These customers would be exempt from wearing a face covering Recommendation: Work with stakeholder groups to ensure the guidance regarding what people should do on public transport is as clear as possible			✓							
	N	7	Specific impact: some customers may not be able to tolerate wearing a face covering psychologically (i.e. claustrophobia) or physically (i.e. allergies)	These customers would be exempt from wearing a face covering Recommendation: Work with stakeholder groups to ensure the guidance regarding what people should do on public transport is as clear as possible			✓							
	N	8	Specific impact: customers with speech impairments may not be understood in dialogue.	Recommendation: Work with stakeholder groups to ensure the guidance regarding what people should do on public transport is as clear as possible Recommendation: IDAG recommendation - advise staff not to challenge these customers if the customer does remove a face covering at the social distance advised by Government (currently 2m distance)			✓							
	Note	9	Specific impact: Nigab and burka wearers will not need to adopt additional fabric layers to cover their nose and mouth	Recommendation: Work with stakeholder groups to ensure the guidance regarding what people should do on public transport is as clear as possible Recommendation: Ensure customer and staff communications are clear that any kind of fabric face covering is acceptable as long as it covers the nose and mouth.			✓							
	N	10	Specific impact: customers on low incomes may not be able to afford or have access to face masks.	These customers are not exempt from wearing face coverings Recommendation: Ensure customer and staff communications are clear that any kind of fabric face covering is acceptable as long as it covers the nose and mouth. The risk here is low and we assume anyone will be able to create a covering from items they have to hand - scarves/jumpers etc. Work with stakeholder groups to explore if this presents real difficulties for any groups			✓	Leaflet available explaining how to make your own face covering is being developed to hand to customers. Review draft to ensure it mentions you can use items of clothing as a substitute to a formal face mask - no special purchases are necessary. Update 16th June: 300 face masks are being made available to 30 LU stations for staff to distribute at their discretion to those who have forgotten or are unable to create their own face covering. This supply acts as a fall back at busy stations to support all customers.						
	N	11	Specific impact: some customers have already been advised not to wear face coverings by the government (e.g. those with respiratory conditions. See: https://www.asthma.org.uk/about/media/news/face-covering-advice-for-people-with-asthma)	These customers would be exempt from wearing a face covering Recommendation: Work with stakeholder groups to ensure the guidance regarding what people should do on public transport is as clear as possible			✓							
	N	12	General customer impact: Customers may not understand why others are not wearing face coverings. This could create a barrier for those unable to wear face coverings who may fear confrontation or feel uncomfortable about their inability to comply and deter them from travelling. This could also lead to animosity between customers due to a lack of understanding about why others are not wearing them and potentially conflict.	Recommendation: Produce and distribute a badge to signify that the wearer is unable to wear a face covering. Wearing is to be optional. POMAS or sunflower lanyards have been suggested as potential alternatives but do not communicate about face covering exemption to others effectively enough Recommendation: Accompany a badge with clear comms to customers and staff about the reasons people may be exempt from wearing a face covering			✓	CCT are looking to ROD/DIFF and other TOCs to see what they are doing to mitigate this. One possibility is a badge for customers/staff is being explored, which could be accessed in a manner similar to POMAS and BOB badges - customers may be able to request them online. At this stage, a new badge will be not be being handed out by staff in stations from 15th June						
	P	13	The measure is designed to reduce the transfer of COVID-19 between customers and staff. It will have a positive impact for all but particularly for those who may be more vulnerable to COVID-19.	None.	✓									
LU staff have been given face masks and encouraged to wear them, however it is not mandatory. They have been given guidance on how to safely wear them. LU staff have been given guidance to not remove their face masks in order to better communicate with customers - LU staff briefing note on accessibility Note Bus drivers aren't being given masks.	N	14	The above specific customer impacts (2-13) will apply to our workforce too	The voluntary nature of face coverings means that there will be no impacts for anyone who is not able to wear one. This may however increase the risk of infection between staff. We know that those who are male, older, BAME and have underlying health conditions are most at risk. Recommendation: We will communicate to all staff the risks that not wearing a face covering poses to their colleagues and urge everyone to wear one if at all possible. We will stop short of comms that risk stigmatising those who can't wear one Recommendation: design a badge which can also be worn by TL staff. The voluntary nature of face coverings means that there will be no impacts for anyone who is not able to wear one. This may however increase the risk of infection between staff. We know that those who are male, older, BAME and have underlying health conditions are most at risk			✓							
Face coverings are being given away to customers, free of charge, at some stations w/c 8th June - customers have to take one rather than being handed actively to everyone, and this activity is prior to 15th June	P	15	No negative impact due to voluntary nature of the hand out	N/A	✓		None needed							

Reference number	Abbreviation	Reference documents or abbreviation meaning
	D&I	TfL Diversity and inclusion team
	DAR	Dial-a-Ride
	DLR	Docklands Light Railway
	EA	Equality Act 2010
	EAL	mirates Air-line
	IDAG	Independent Disability Advisory Group
	LO	London Overground
	LRS	London river services
	LU	London Underground
	PCG	Protected Characteristic Group (As identified within the Equality Act)
	PSED	Public Sector Equality Duty (section 149 of the Equality Act)
	REqIA	Rapid Equality Impact Assessment
	SISG	Social Impact Steering Group
	TfL	Transport for London
	TPH	Taxi and private hire
	TVM	Ticket Vending Machine