



## Bristol City Council Equality Impact Assessment Form

Equalities impact assessments (EqIAs) are used to ensure we are considering the needs of all staff and all service users when planning or changing services, strategies, policies, procedures and/or contracting services, undertaking reviews or planning projects. The process you use to undertake equalities impact assessments enables us to evidence that we are giving **due regard** to the public sector equality duty.

It is best to start your Equality Impact Assessment (EqIA) at the beginning of any project, policy revision, strategy change etc. It will then become an integral part of the planning process, ensuring that we, as a council, "get it right first time".

We also recommend that you work through the form using the EqIA guidance and that you contact your directorate equalities officer for support. See the end of this document for a list of equalities officers.

The form can be completed electronically and the boxes to complete will have the question highlighted in bold and the space thereafter will expand as you type into it.

### Public sector equality duty

We carry out equalities impact assessments as part of our public sector equality duty (Equality Act 2010 section 149). The public sector equality duty requires us give **due regard** to the need to:

- a) Promote equality of opportunity
- b) Eliminate unlawful discrimination
- c) Promote good relations between people who share a 'protected characteristic' and those who do not.

The public sector equality duty requires us consider the effect our policies and practices have on people who share the following '**protected characteristics**':

- Age
- Pregnancy & maternity
- Transgender
- Sexual orientation
- Religion and belief
- Ethnicity
- Gender
- Disability

Hereafter we refer to groups of people who share a protected characteristic as 'equalities communities'.

### How the EqIA should be used as part of the decision-making process

Each decision-maker must, therefore, have due regard to the need to:

1) Eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Equality Act 2010.

2) Advance equality of opportunity between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to:

- Remove or minimise disadvantage suffered by persons who share a relevant protected characteristic;
- Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of people who do not share it. In relation to disabled people, this includes, in particular, steps to take account of disabled persons' impairments (disabilities);
- Encourage persons who share a protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

3) Foster good relations between persons who share a relevant protected characteristic and those who do not share it. This involves having due regard, in particular, to the need to --

- Tackle prejudice; and
- Promote understanding.

This EqIA form is structured to assist you to consider the above as you develop your proposal. In order to comply with the public sector equality duty you should set out how you have given due regard to the above issues in reports to decision-makers, particularly in reports to elected members. The EqIA provides evidence of compliance with the public sector equality duty.

Reports to decision-makers must include an equalities impact assessment section where you report how the public sector equality duties are relevant to the proposals and how these duties have been taken into account in developing the proposals. Step 6 of the EqIA can be replicated into the report and we suggest you provide e-link to full document, or include the EqIA as an appendix. Where no equality impact assessment has been undertaken, give reasons why not.

**Name of policy, project, service, contract, review or strategy being assessed (from now on called 'the proposal')**

**Directorate and Service:**

**Lead officer** Julia James

**Additional people completing the form (including job title):** Jo Hunt Business Rate Group Leader, Andrew McLean Equalities Officer

**Start date for EqIA:**

**Estimated completion date:**

**Step 1 – Use the following checklist to consider whether the proposal requires an EqlA**

1. What is the purpose of the proposal?

To update the 2001 Non-Domestic Rate Discretionary Rate Relief Policy.

	High	Medium	Low
2. Could this be relevant to our public sector equality duty to:			
a) Promote equality of opportunity		X	
b) Eliminate discrimination		X	
c) Promote good relations between different equalities communities?	X		

If you have answered ‘low relevance’ to question 2, please describe your reasons

N/A

3. Could the proposal have a positive effect on equalities communities?

Please describe your initial thoughts as to the proposal’s positive impact

Would groups join together to meet the overarching criteria?

The shift in focus to regeneration within the proposed policy could have a positive knock on effect by encouraging economic growth and revitalising areas with a high percentage of unoccupied property thereby increase in wealth.

The support for regeneration will bring property in the more deprived areas of Bristol back into use as this is often where most vacant property is situated. This may have a positive impact on areas where there is social deprivation.

Although we are shifting the focus of the policy, we want organisation to be better organised and therefore show they will manage their funding, optimise their sustainability and provide added value over the duration of the funding.

4. Could the proposal have a negative effect on equalities communities?

Yes

Please describe your initial thoughts as to the proposal’s negative impact

1. All current recipients of DRR will have to reapply under the new policy. The relief awarded will be reviewed bi-annually. This will reduce the ability of organisations to plan for the longer term.
2. The proposed ratios of relief awarded (by group) are changing following the adoption of the Council’s forward looking strategic plan and priorities.

3. Some groups or organisations may cease to function.
4. Those seeking employment from within young people, BME, women communities
5. There are small numbers of organisations that may have their level of funding reduced. This is related to the increased focus on regeneration.
6. The data we have is not conclusive but can be used in part to evidence or establish where and how equalities groups will be affected.

If the proposal has low relevance and you do not anticipate it will have a negative impact, please sign off now. Otherwise proceed to complete the full equalities impact assessment

Service director.....

Equalities officer .....

Date.....

<b>Step 2</b>	<b>Describe the Proposal</b>
2.1	<p><b>Briefly describe the proposal and its aims? What are the main activities, whose needs is it designed to meet, etc.</b></p> <p>The current discretionary rate relief policy has been in place for 12 years. It has been updated regularly to up rate financial and other criteria.</p> <p>Whilst fit for purpose from the business ratepayers perspective, the current policy has led to the award of DRR steadily increasing over the last three years resulting in a budgetary overspend of circa £200k in 2012/13 against a budget of £216k.</p> <p>The proposal sets a budget of £300k for the financial year 2014/15 which allows for continued growth in DRR awards whilst reducing overall Council expenditure by redefining the criteria used in determining the award of relief.</p> <p>Furthermore, the proposal reflects the Council’s current strategic plan and priorities by continuing to support not for profit organisations, charitable groups and voluntary and community sector organisations. The shift of focus towards regeneration aims to increase community resilience through the creation of stronger communities and will allow voluntary groups to deliver services and community support.</p> <p>The proposed policy differs from the current policy by not only devolving the DRR budget across a number of Directorates and Services but also by</p>

introducing a second level of validation of eligibility by the Service area that will be funding the award. Each Service will use their own secondary criteria to determine eligibility once an application has passed the overarching criteria. The main changes are:

1. Two stage decision process
2. Devolved DRR budget to individual Directorates
3. Increased focus on regeneration
4. Organisations must have defined clear, stated objectives

Proposed policy:

**Stage One: Financial Assessment**

To be eligible for DRR, an applicant organisation must-

Meet the financial eligibility criteria:

A. If the annual turnover of the organisation exceeds £250,000\* (in the most recent set of published audited or appropriate accounts) relief will not be awarded. All other cases will be considered under Stage B and C.

B. The income and expenditure accounts of the organisation over a five year period will be analysed and relief awarded if the accumulated surplus does not exceed £20,000\*. If the organisation has not been in existence for 5 years and accounts are only available for 1,2,3 or 4 years a pro rata accumulated figure will be used to determine eligibility.

An allowance will be made against the aggregate sum of £20,000\* where organisations can demonstrate to the satisfaction of officers that surpluses are being accumulated for a specific purpose.  
(The figures used in stage A and B increase each year in line with inflation.)

C. If the organisation's accumulated surplus is above the limits at Stage B then the amount of rates paid in the year of application will be considered. If the annual surplus shown in the latest set of accounts exceeds the rates payable by more than 100%, relief will be refused. Organisations recording a surplus less than this will be granted relief.

D. Declare all grant support received (from BCC and other bodies).

\*Amount to increase annually in line with inflation. Applications which fail to meet the financial criteria outlined will be reconsidered by service directors if an appeal is received.

At the second stage of the process, to determine the size of the DRR award, each directorate will consider the number of eligible organisations and the total call on their available budget, plus other criteria. Full details can be found in the policy proposal.

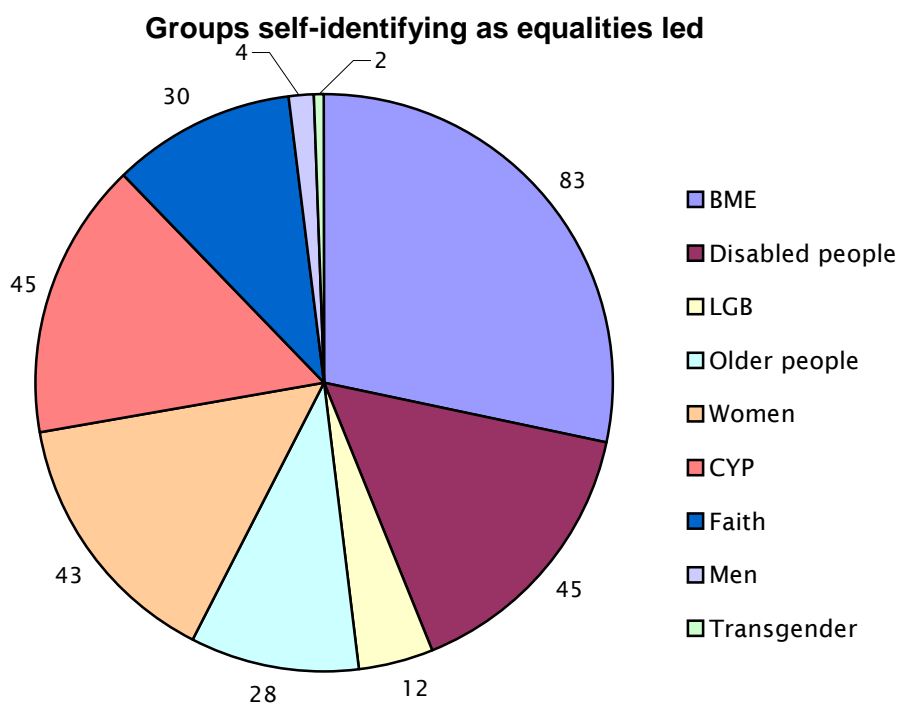
2.2	<p><b>If there is more than one service* affected, please list these:</b></p> <p>Yes, as follows:</p> <ul style="list-style-type: none"> <li>• Revenues &amp; Benefits</li> <li>• Economy, Enterprise &amp; Inclusion</li> <li>• Environmental &amp; Leisure</li> <li>• Children and Young People's Services</li> <li>• Neighbourhoods &amp; Communities</li> <li>• Arts, Events &amp; Films</li> </ul>
2.3	<p><b>Which staff or teams will carry out this proposal?</b></p> <p>As follows:</p> <ul style="list-style-type: none"> <li>• Revenues &amp; Benefits – Jo Hunt</li> <li>• Economy, Enterprise &amp; Inclusion - Jason Thorne</li> <li>• Environmental &amp; Leisure – Nikki Squire</li> <li>• Children and Young People's Services - Liz Peddle</li> <li>• Neighbourhoods &amp; Communities - Jane Houben</li> <li>• Arts, Events &amp; Films – Rosa Clark</li> </ul>

**Step 3****Current position: What information and data by equalities community do you have on service uptake, service satisfaction, service outcomes, or your workforce (if relevant)?**

The business rate team does not collate data and therefore does not have a full picture across the city on the service uptake and beneficiaries of discretionary rate relief. The following data has been collated from a number of sources to help inform the EqIA and provide an indication of the breadth of equalities organisations in the city.

**Information received from VOSCUR**

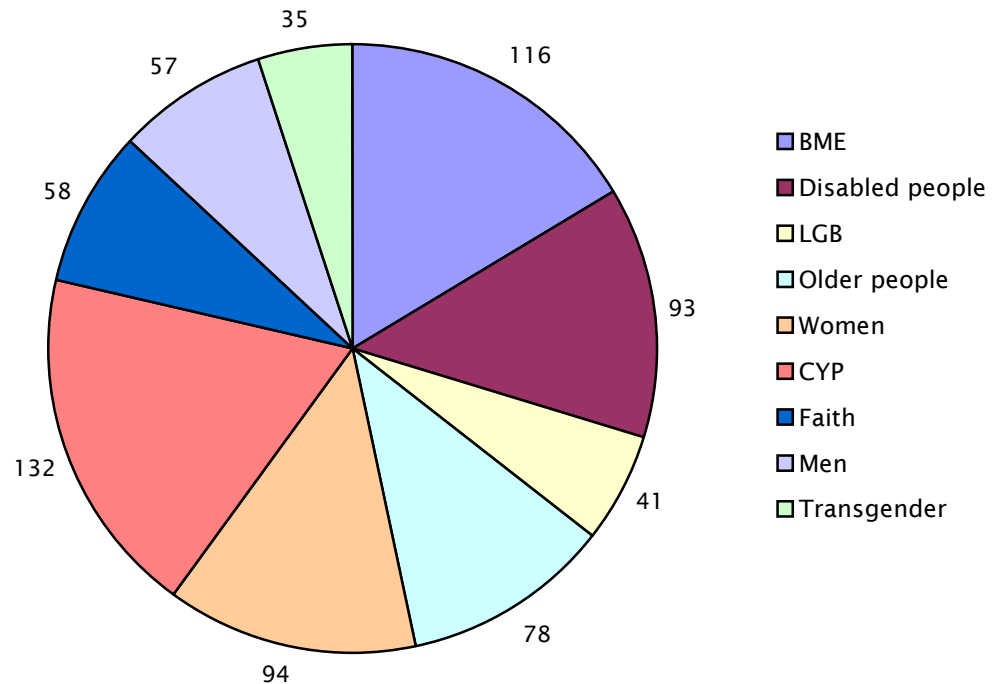
Voscur is funded by Bristol City Council to provide support to the voluntary and community sector (VCS) in Bristol. Voscur has a membership of VCS organisations and has provided us with equalities monitoring information for 2012/13 about these member organisations. Figure (1) below shows the member organisations that identified as being 'equalities-led'. By this we mean that the management committee or board is predominantly from a particular equalities group.



The majority of the organisations that identified as being 'equalities led' are from BME communities with the smallest group as transgender.

Figure (2) below shows the equalities communities served by Voscur's member organisations.

### Groups self identifying as serving equalities communities



Of those self-identifying as serving equalities communities, the largest group was children and young people. This was closely followed by the BME sector then women's groups.

Information received from Bristol City Council's Investment and Grants Team about Community Investment Funding in 2012/13

The VCS organisations in receipt of the Council's Community Investment Funding must undertake equalities monitoring of their service users as condition of funding. The collated monitoring data for the 43 organisations funded for the first half of 2012/13 shows that of the 19,434 service users who completed equalities monitoring, respondents identified themselves as:

- 50% men
- 48% women
- 58% Black or Minority Ethnic (BME)
- 9% disabled people
- 0.5% lesbian, gay or bisexual
- 0.1% transgender
- 7% older people
- 9% young people (aged 16 – 25)
- 25% people of faith.

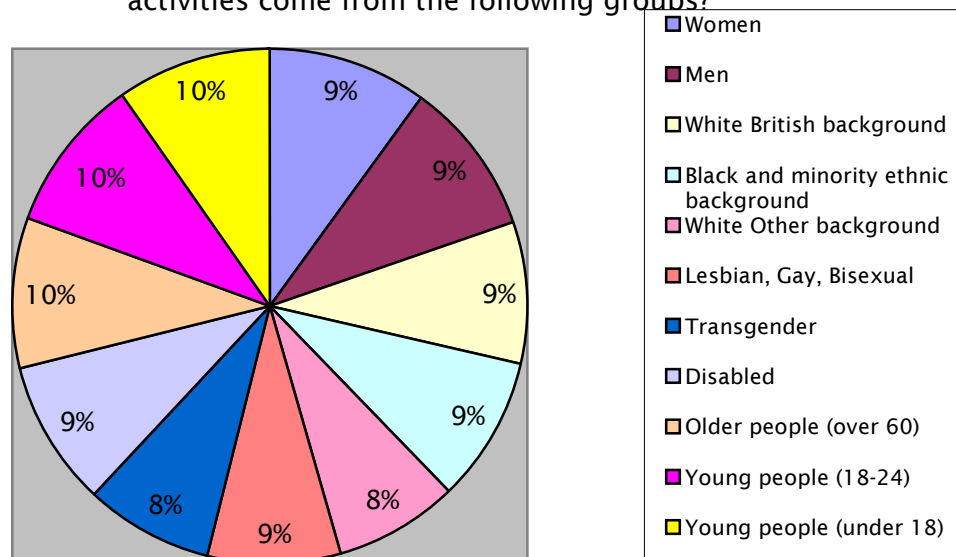


You need to describe your current position (As Is) so you can benchmark the impact of your proposal.

In Step 3 we are asking you to record the % of people from equalities communities who are currently benefiting from your service\*. Then we will ask you to compare these figure to the % of people from equalities communities in Bristol (or in the relevant wards if it is a local service) and evaluate whether any equalities groups are under or over represented in your service user profile, employee profile, service outcomes and/or satisfaction rates.

The consultation process during Autumn 2012, relating to the freeze in discretionary rate relief, asked organisations to identify their usage by equalities groups. The resulting information is inconclusive and cannot be used to identify impact but it does indicate that current business rate reductions benefit equalities groups equally.

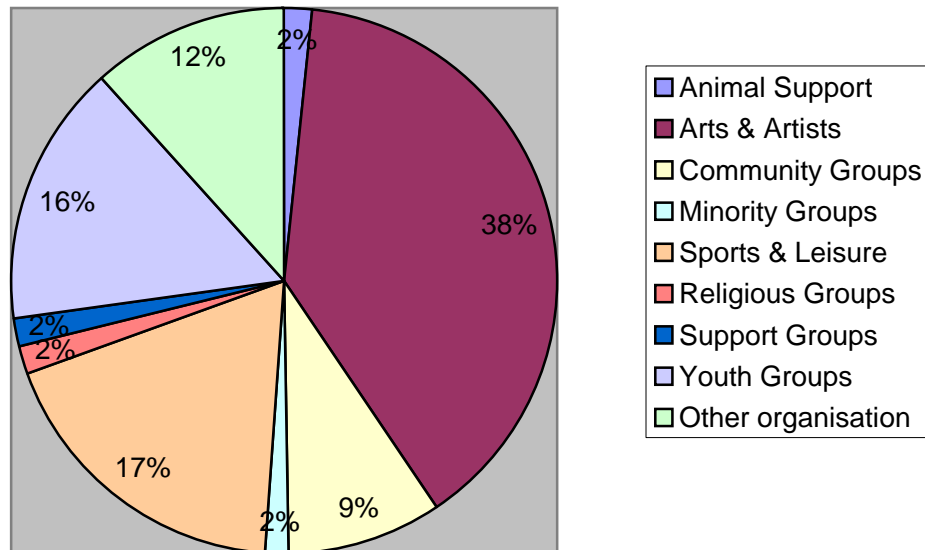
What percentage of the people who access your organisation's activities come from the following groups?



33 of the youth organisations that currently receive DRR come under the title for boys only (how ever scouts accept girls and therefore not exclusive to boys), whilst only two are for girls only. Ten community organisations and one youth organisation are for young people of a particular faith, which includes people from four different faiths.

No specific equalities focus for any arts organisations or animal organisations. One sports organisation has significance for people of a particular ethnic group, although it is used by the wider community and eight community organisations provide services to people from differing BME communities. One sports club and one community centre are for men only. Two community organisations support disabled people and four are for women only. Therefore out of the organisations. 63 organisations who currently benefit from DRR have service users from a particular equalities protected characteristic. Generic organisations and local organisations will of course also provide services, which benefit people from equalities groups.

### Which of the following best describes your type of organisation?



Whilst all groups that were in receipt of DRR have been consulted the chart clearly shows that the majority of responses were received from art based groups although a variety of organisations have responded overall. Arts based groups do however represent 50% of the current DRR budget. The next highest responding group was sports & leisure who currently represent 33% of the budget.

The above data cannot be considered conclusive, however the data collated following the freeze consultation can be used as a guide to show how equalities communities are currently benefiting from the relief.

There were 129 respondents not all business ratepayers, but if we assumed they were, this would represent roughly 40% of the 323 organisations currently in receipt.

The varied data above shows that there is a diverse range of Third Sector organisations operating in Bristol and that many of these are led-by and serving equalities groups around the City. We do not have data which indicates the equalities make-up of all third sector organisations which would be affected by this policy, but we can see that a significant number of organisations have a specific equalities focus.

A separate and independent Impact Assessment was undertaken by BOP Consulting. During their consultancy period equalities data was sought. The survey asked questions about the type of people who were attending DRR organisations. The figures shown here are unweighted averages from those who reported figures.

The ratios are averages across the whole set of responses. The 'minority' groups, whether BME, LGBT or disabled people tend to be concentrated in certain organisations rather than being spread evenly across the full sample. It should also be noted that the nature of some organisations means that they may find it hard to collect data on such demographics.

That said, responses do suggest that the DRR organisations taken as a whole are

reaching a broad spectrum of Bristol's people.

- Women: **49%** Men: **51 %**
- Black and Minority Ethnic: **17%**
- White British: **76%**
- Other White: **7%**
- LGBT people: **11%** (though only 20 respondents were able to make an estimate here)
- Disabled people: **15%**
- Young people: **46%** (based on 61 responses)

3.1 **Summarise how equalities communities are currently benefiting from your service\* here (& add an electronic link to the information if possible).**

See above

3.2 **Then compare to the relevant benchmark (eg. the % of people from each community who use your services\* with the % of people within the relevant equalities community who live in your local area or in the city of Bristol).**

The current profile of equalities communities across Bristol is based on the latest 2011 census data.

Please use the following link for detailed information on those communities.  
<http://www.bristol.gov.uk/page/census-2011>

However, headline profile data for the Bristol population (428,434) suggests the following:

- Age: 0 - 17 years = 20% & 65 years and over = 13% of the population
- Gender: Male = 49.8% Female = 50.2%
- Disability: disabled people = 16.7%
- Ethnicity: White British 84% & Black & Minority Ethnic = 16%
- Faith/Belief (including no belief): Christian = 46% Muslim = 5.1% & no faith = 37%

3.3 **Evaluate what the data in 3.1 & 3.2 tells you about how the current position affects people from equalities communities (see Guidance for further information and examples).**

Due to the redistribution of funding across the services (see overview page 1) the largest drop in funding will be seen by groups and organisation supporting the arts. If a high percentage of the arts benefit equalities groups then there will undoubtedly be a negative impact. The data to be collated from the impact assessment will be looked at to help advise us further.

The focus on the economy, enterprise and inclusion will help improve opportunities for those in the city's most deprived communities and those in equality communities. The organisations supported under this area of the policy in future are likely to represent and involve a wide range of equality groups and communities.

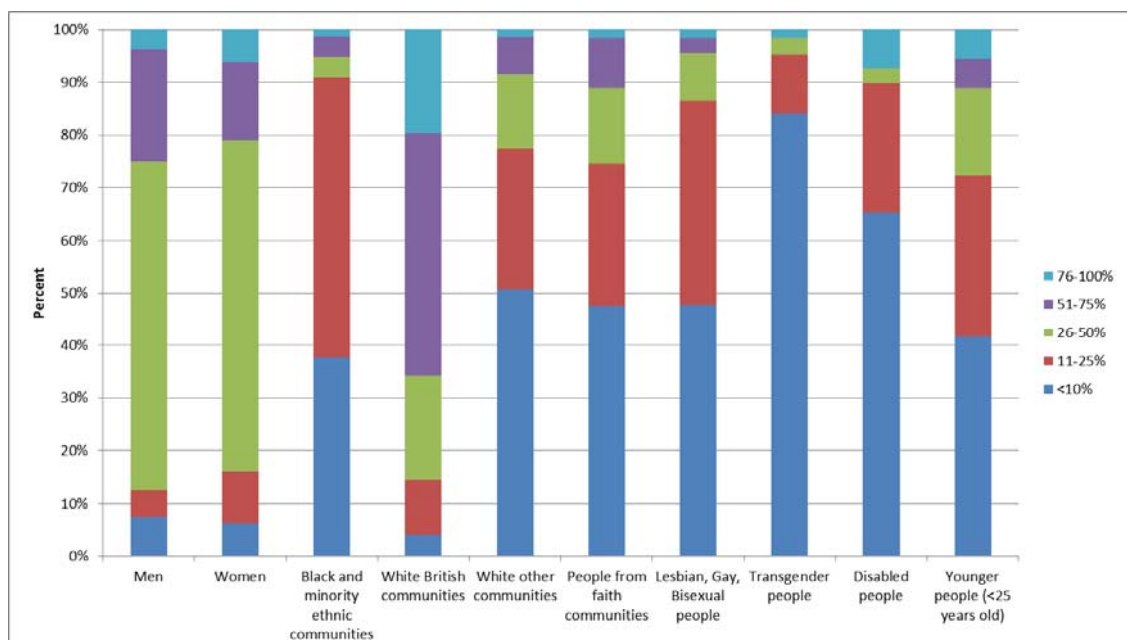
Please note, your evaluation in 3.3 will be built upon in Step 5 where you will set out what you plan to do to address any issues for equalities communities

**Step 4**      **Ensure adequate consultation is carried out on the proposal and that all relevant information is considered and included in the EqIA**

This section refers to the proposal as described in step 2. When we propose changes to services\*, it is important that we consult with service users, and staff or equalities community groups where relevant. Your proposal may be based on service users suggestions that have been made in the past.

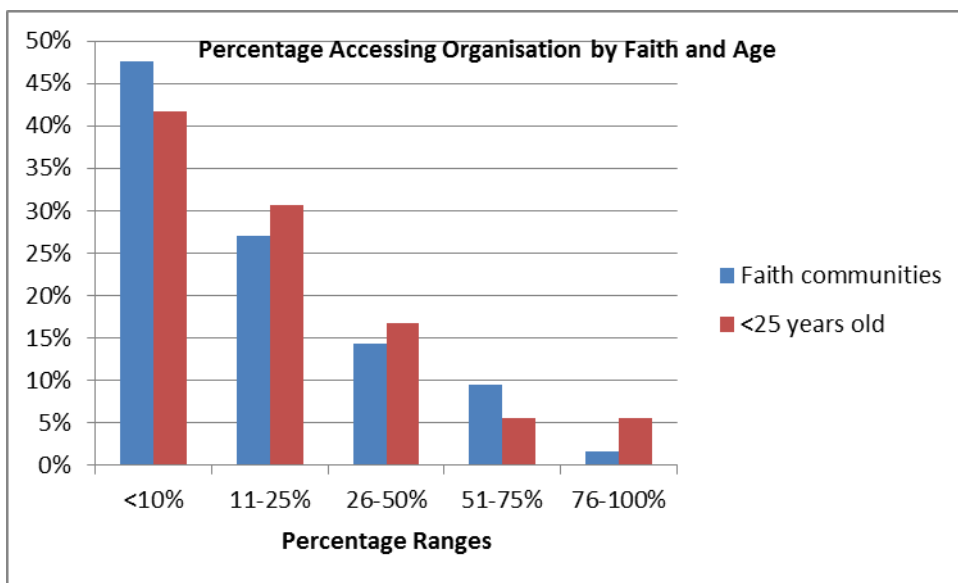
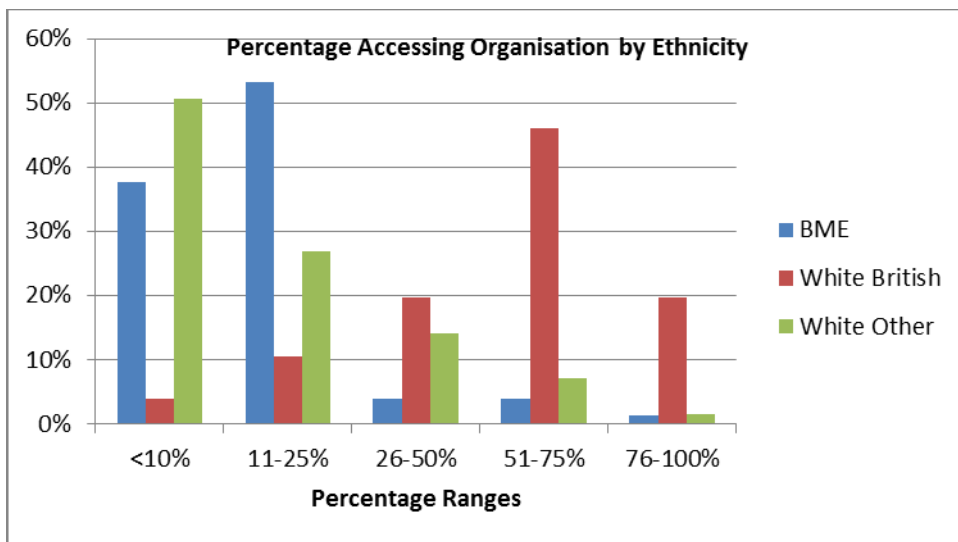
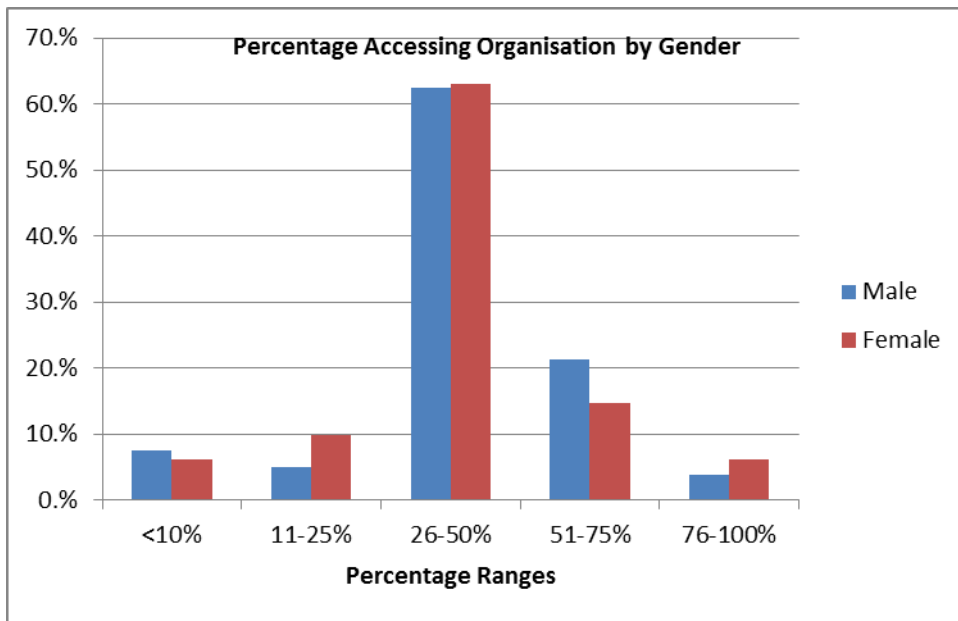
Respondents to the DRR consultation were as follows:

- There were 107 respondents not all business ratepayers, but if we assumed they were, this represents a third of the organisations currently in receipt DRR.
- 47% of respondents disagreed in part or in full in the way we proposed to devolve the DRR spend.
- 38% of respondents agreed either fully or in part in the way we proposed to devolve the DRR.
- 66% of respondents agreed in full or in part with the overarching criteria for eligibility.
- With regard to each areas eligibility criteria over 63% of respondents agreed in full or in part for all areas.
- The results show a general agreement in the process. There were a large number of written responses which we have responded to and used to adjust the policy.
- Arts and artists groups were particularly well represented at 42%, 45 by number, as were youth groups at 29%, 31 by number.
- Percentage Accessing Organisation supported by DRR by equalities group – see below for a breakdown



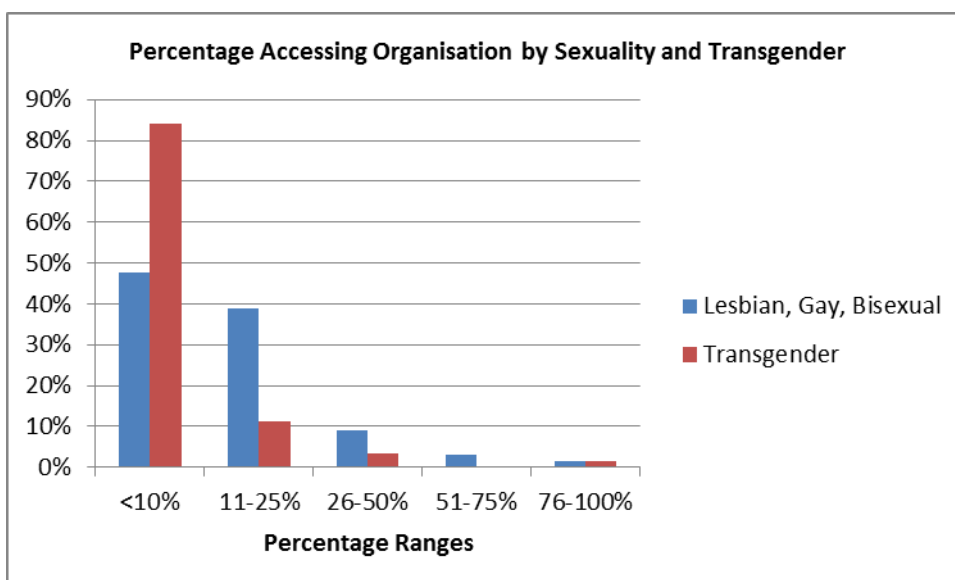
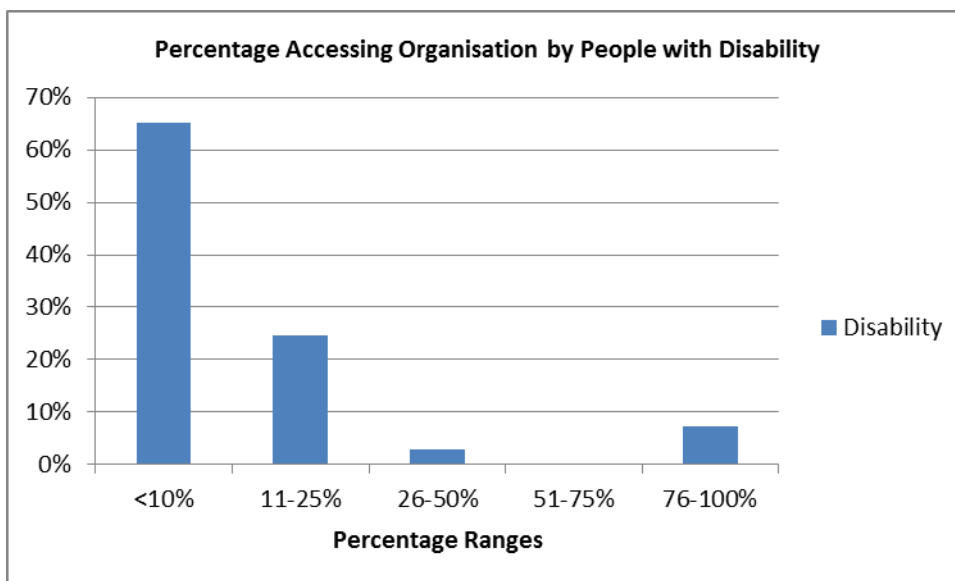
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4.1

**Describe any consultations that have taken place on the proposal. Please include information on when you consulted, how many people attended, and what each equalities community had to say (& provide a web link to the detailed consultation if possible).**

Three month consultation took place from June 2013 as described above.

4.2

**Please include when and how the outcome of the consultation was fed back to the people whom you consulted.**

The responses, and outcomes of the consultation will be available on the city councils consultation web pages.

Please note details of the consultation findings in 4.1 will be built upon in Step 5 where you will set out what you plan to do to address any issues for equalities communities.

<b>Step 4</b>	<b>Ensure adequate consultation is carried out on the proposal and that all relevant information is considered and included in the EqIA</b>
<p>We have used information provided from the consultation in the policy paperwork. Written feedback was received relating to little consideration regarding which impairment groups are not able to access the existing DRR support organisations is the baseline statistics.</p> <p>The process has highlighted the lack of data surrounding this both from a Service area and the Business Rate team point of view.</p> <p>It would be useful to have desegregated information for disabled people in terms of the impairment spectrum and the accessibility to the buildings supported by DRR. An action to take forward is to explore how best to collect this information for future use.</p>	

<b>Step 5</b>	<b>Giving due regard to the impact of your proposal on equalities communities</b>	
<p>In this section you will consider the impact of your proposal on equalities communities, this will help you to develop a comprehensive service* which considers the needs of all communities.</p> <p>The public sector equality duty requires us to give due regard to the need to promote equal opportunities (create positive impacts where possible) eliminate discrimination (mitigate negative impacts where possible) and foster good relations. The process of giving due regard means that you should include all identified impacts, whether or not you plan to take actions to address these</p> <p>Possible Impact column: Consider how the suggested changes in your proposal could affect different equalities communities, including how the proposal will meet the differing needs of equalities communities.</p> <p>Actions to be included in the Proposal column: Include what you intend to do about the impact, ideally your actions will maximise opportunities to make improvements for equalities communities and mitigations for any negative impacts.</p> <p>In this section you need to build on your data and consultation findings in steps 3 and 4. You may need also to consider people who could have high or differing needs within a wider equalities community such as children in care, carers, people who do not speak English, gypsies and travellers etc.</p>		
<b>Possible Impact on Equalities Communities, whether or not you will address the impact</b>		<b>Actions to be included in the proposal</b>
<p><b>Age</b> We expect positive impacts for children and young people, as this policy will focus DRR support to specific service areas, including youth groups.</p>		<p>We will ensure that the needs of children accessing groups supported by DRR are considered in the policy.</p>

<b>Step 5</b>	<b>Giving due regard to the impact of your proposal on equalities communities</b>	
<p><b>Disability</b> Some organisations or groups currently in receipt of DRR may no longer be eligible for relief given the criteria change and the re arranging of how the money is distributed between the services. Unfortunately we do not hold detailed information on the make-up of each group with regard to financial criteria and set up of the organisation.</p>	<p>We will consider if the organisation's activities provided for and accessible to local communities in need whilst considering local need and disadvantaged and deprived communities, as part of the application criteria.</p> <p>A need to explore how we can best collect more detailed information on the range impairments and the accessibility to the buildings supported by DRR in the future.</p>	
<p><b>Ethnicity</b> Some organisations or groups currently in receipt of DRR may no longer be eligible for relief given the criteria change and the re arranging of how the money is distributed between the services. Information from infrastructure organisations suggests a high reach into black and minority ethnic (BME) communities. Therefore this community will be impacted on with the changes.</p>	<p>According to latest census data BME communities are located in some of the most deprived parts of the city. Therefore we will need to consider and ensure organisation activities are accessible to those communities in need, as part of the application criteria.</p>	
<p><b>Gender</b> Many of the impacted organisations appear to deliver services or represent different gender groups.</p>	<p>The application criteria will need to continue to ensure neither men or women are disadvantaged in the roll out of the new policy</p>	
<p><b>Pregnancy &amp; maternity</b> None of data or the information from our consultation exercise demonstrated disproportionate impact for this group</p>		
<p><b>Religion and belief</b> Information from the voluntary sector suggests a reasonable number of organisations working with or representing these communities will be impacted with the change of policy. A number of these organisations or groups currently in receipt of DRR may no longer be eligible for relief given the criteria change and the re arranging of how the money is distributed between the services.</p>	<p>We will consider if the organisation's activities provided for and accessible to local communities in need whilst considering local need and disadvantaged and deprived communities, as part of the application criteria.</p> <p>However we will ensure that the proposed policy and 'non proselytising' criteria are clearly communicated to organisations representing the interests of faith communities.</p>	



<b>Step 5</b>	<b>Giving due regard to the impact of your proposal on equalities communities</b>	
<b>Sexual orientation</b> The council and other areas across the city have limited information on the range of organisations working with or representing these communities.		Future consideration needs to be explored to capture the impact of the changes and to support/signpost those organisations with any potential loss of DRR
<b>Transgender</b> Some organisations or groups currently in receipt of DRR may no longer be eligible for relief given the criteria change and the re arranging of how the money is distributed between the services. Unfortunately we do not hold detailed information on the make-up of each group with regard to financial criteria and set up of the organisation.		We will consider if the organisation's activities provided for and accessible to local communities in need whilst considering local need and disadvantaged and deprived communities, as part of the application criteria.
Any other relevant specific groups		We believe that this policy change will have a positive impact for disadvantaged communities in areas of deprivation, as it will focus DRR funding to areas of need.

<b>5.2</b>	<b>Next Steps</b>
<p>In the table above you have identified 'actions to be included in the proposal'. Some of these will be in-hand (already acknowledged and mitigating actions are underway) but some may be new.</p> <p><b>So that we can more clearly demonstrate what has changed as a result of this equalities impact assessment, please list below new actions identified and say when and how you will put these new actions into practice.</b></p> <p>The consultation to run from June 2013</p> <p>Part of the application criteria will take into account that the organisation's activities will be provided for and accessible to local communities in need whilst considering local need and disadvantaged and deprived communities.</p> <p>As previously identified above in the report, the process has highlighted the lack of data surrounding DRR and how it benefits equalities groups, both from a Service area the Business Rate team perspective.</p> <p>It would be useful to have desegregated information for equalities groups in terms of type matched with the accessibility to the building supported by DRR. Our recommendation is to explore how best to collect this information for future and better use.</p>	

<b>Step 6</b>	<b>Meeting the aims of the public sector equality duty</b>
<p>In this section you should summarise the relevant equality issues (including significant adverse impacts that you are unable to mitigate) and set out how consideration of the public sector equality duty aims has been taken into account in developing the proposal.</p>	
6.1	<p><b>Describe how, in completing steps 1-5, you have given due regard to the three aims of the public sector equality duty (a-c above).</b></p> <p>(a) Equality of opportunity: we will ensure that organisations from all equalities communities have an opportunity to respond to our consultation about this policy and we will monitor the responses by equalities groups to ensure that this is the case.</p> <p>(b) Eliminate unlawful discrimination: we will use the feedback received and the Impact assessment report to identify any potential discrimination or negative impacts and will work to identify actions to mitigate against these in the final policy.</p> <p>(c) Promoting good relations: we will ensure that the assessment criteria used in the final policy will contribute to promoting good relations, that these are fair, transparent and robust and that organisations in receipt of DRR have clear funding conditions which outline their responsibilities to promote good relations.</p>
<p>This section serves as an executive summary of the proposal and can be duplicated into any reports for decision-makers with an electronic link to the full equalities impact assessment (or include full EqIA as a an appendix if needed).</p>	

<b>Step 7</b>	<b>Monitoring arrangements</b>
7.1	<p><b>If your proposal is agreed, how do you plan to measure whether it has achieved its aims as described in 2.1. Please include how you will ensure you measure its actual impact on equalities communities?</b></p> <p>Equalities data from BOP Impact Assessment.  Equalities monitoring of applicant organisations once the policy and process is finalised and implemented.  Periodic review of equalities monitoring data to ensure that the policy and implementation processes are delivering the public sector duties (a-c) above.</p>

