

# Equality Impact Assessment [version 2.12]



Title: Waking Watch for High-Risk buildings Citywide	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input checked="" type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Growth and Regeneration	Lead Officer name: Ashley Lehou-Reuben
Service Area: Housing & Landlord Services	Lead Officer role: Planned Improvements Service Manager

## Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](https://sharepoint.com).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

### 1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

Housing and Landlord Services intend to provide Waking Watch cover to 16 blocks spread across the city. Initially this started as 38 blocks in 2022 when EQIA was previously completed.

Waking Watch provides 24 hour patrols by fire wardens to ensure the safety of residents in blocks which have been identified as being at increased risk due to the nature of existing cladding systems and more recent concerns raised both nationally and internationally about the safety of EPS (expanded polystyrene) cladding systems, or the design and construction of the block. If a fire is spotted, the Waking Watch service will inform the emergency services, alert residents and begin a simultaneous evacuation of the block pending the arrival of Avon Fire and Rescue.

Waking Watch is one of a range of interim measures being introduced to vulnerable blocks until long term solutions (e.g. removal of suspect cladding systems) can be implemented. It is anticipated that as other interim measures such as sprinklers and evacuation alarms are installed, Waking Watch can be phased out, or the number of blocks requiring Waking Watch can be reduced. Until then it is a vital measure to ensure that fires are detected early and that residents can be safely and quickly evacuated in the event of a fire.

Waking Watch wardens will also guide residents to a place of safety. Simultaneous evacuation is a change to the previous "Stay Put" policy. This change in policy, along with the provision of Waking Watch services, follows the identification of vulnerable blocks, and two recent fires in high rise blocks owned by BCC, one of which resulted in loss of life.

## 1.2 Who will the proposal have the potential to affect?

<input checked="" type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input type="checkbox"/> The wider community
<input checked="" type="checkbox"/> Commissioned services	<input type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

## 1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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## Step 2: What information do we have?

### 2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: [How we measure equality and diversity \(bristol.gov.uk\)](http://bristol.gov.uk)

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](http://sharepoint.com). See also: [Bristol Open Data \(Quality of Life, Census etc.\); Joint Strategic Needs Assessment \(JSNA\); Ward Statistical Profiles.](http://sharepoint.com)

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](http://sharepoint.com) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](http://sharepoint.com) and [Stress Risk Assessment](http://sharepoint.com)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
Data profiles for each of 34 Bristol wards <a href="http://bristol.gov.uk">New wards: data profiles - bristol.gov.uk</a>	These documents provide information in relation to Bristol wards based on latest available data including deprivation, education, housing and house hold size, care availability, ethnicity quality of life, life expectancy, premature mortality, child poverty crime and social care.

<p>BCC Report Viewer / Tenants and Leaseholders / All tenants, residents, and leaseholders</p>	<p>Detailed information on the characteristics of Bristol City Council tenants such as the proportion of residents from Black, Asian and minoritised ethnic backgrounds; by gender; age; Disability; faith group; or who require assistance for written or spoken English. A high proportion of council tenants are Disabled people, and minoritised ethnic communities are overrepresented in BCC accommodation.</p> <p>Officers also hold detailed records of those tenants who require additional support and/or are a <a href="#">vulnerable</a> person in individual blocks.</p> <p>As such this is highly confidential information and will only be provided to contractors on a need-to-know basis to meet resident's additional needs once they have been formally appointed and have confirmed fully compliance with current data protection requirements</p>
<p><a href="#">Quality of Life in Bristol Survey</a></p>	<p>The Quality of Life data dashboard tool shows disparities in outcomes by protected and other relevant characteristics – including for those renting from the Council compared to people with other kind of tenancies and Bristol averages. Currently those who rent from the Council have &gt;100 indicators which are worse than the Bristol average</p>
<p><a href="#">Code of Practice for the remediation of residential buildings - GOV.UK (www.gov.uk)</a></p>	<p>Sets clear expectations and provides guidance for remediation projects, emphasising a resident-centric approach, effective communication, compliance, and stakeholder involvement to improve residents' experiences through better planning and considerate management.</p>
<p><a href="#">Building Safety Act 2022</a></p>	<p>The act includes several provisions aimed at protecting vulnerable people, particularly in the context of building safety and management. The Act designates accountable persons for high-rise residential buildings. These individuals are responsible for managing building safety risks and must consider the needs of vulnerable residents when implementing safety measures.</p>
<p><a href="#">Public Protection Guidance by Health and Safety Executive (HSE).</a></p>	<p>Public Protection Guidance by HSE: The Health and Safety Executive (HSE) provides guidance on protecting the public during construction works. This includes measures to manage site access, prevent unauthorised access, and ensure that hazards are controlled to avoid causing distress or harm to vulnerable groups.</p>
<p><b>Additional comments:</b> The majority of our high rise housing stock is in the most deprived wards within the city.</p>	

## 2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Gender Reassignment
<input checked="" type="checkbox"/> Marriage and Civil Partnership	<input checked="" type="checkbox"/> Pregnancy/Maternity	<input checked="" type="checkbox"/> Race
<input checked="" type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual Orientation

### 2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

Bristol City Council tenant profile information may not be reliable. A tenancy audit is completed by BCC approximated every 5 years during the life of a tenancy, however data collected is given voluntarily with a "prefer not to say" option. Bristol City Council may not be advised of changes in personal circumstance between audits, and it is not always possible to carry out a new tenancy audits immediately at the start of a new tenancy. Information about Leaseholders and/or their tenants may not be available.

### 2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing a change process or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

Tenant consultation is carried out by letters being sent to advise the tenants of our plans and encourage engagement with the whole process from an early stage. Tenants who have any concerns or feel they would struggle to evacuate unaided are encouraged to come forward and work with HLS and the Waking Watch provider to agree a Personal Emergency Evacuation Plan.

We will adapt our communication style to the need of the tenant For example, if they are visually impaired any communication may need to be provided by in a different format. Tenants who speak English as a second or additional language may need letters to be translated, or a person who for example is unable to read sufficiently may need additional verbal or pictorial communication.

A series of meetings have been and continue to be held at the affected blocks to reassure residents about the interim measures being implemented and allow queries and concerns to be raised.

### 2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

We will use a Dynamic Purchasing System (DPS) which will allow community groups to apply to be providers of Waking Watch, so that there is the potential for the service to be provided from within the local community.

Waking Watch providers will continue to provide updates to tenants as the service continues. HLS will also continue to keep tenants advised as the introduction of other interim measures progresses.

Residents are encouraged to pass on feedback about the service and are provided with the relevant contact details in order to be able to do this.

Caretakers and Housing Officers are also encouraged to pass on feedback and concerns with the service and are provided with feedback forms and contact details in order to be able to do this.

### Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

#### 3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

##### **GENERAL COMMENTS** (highlight any potential issues that might impact all or many groups)

Whilst we have not identified any significant negative impact from the proposal, we are aware that the service will need to meet the needs of tenants with particular issues which we have highlighted in the table below. Some residents may benefit from extra communication and support to help them navigate these changes. Ensuring that all residents feel informed and have clear avenues for expressing concerns or seeking reassurance can help reduce possible anxiety about changes to policy or perceived increased risks etc.

By providing Waking Watch, HLS intends to:

- Increase fire safety for tenants and their households.
- Reduce the risk from fire for residents of all multi-occupied premises which have been identified as being at increased risk
- Ensure that tenants in buildings where Waking Watch is to be implemented have sufficient information to enable them to evacuate premises in the event of a fire, and to reach a place of safety
- Strive for the highest levels of performance and customer satisfaction.
- Engage with tenants and their households and listen to their feedback to continuously improve fire safety.
- Ensure the principles of Health and Safety and Equal Opportunities are central to working procedures and practices

To join the DPS all providers of Waking Watch services (including any community-led groups or organisations) will be required to demonstrate they will operate in accordance with the Equality Act 2010 and the s.149 Public Sector Equality Duty, including providing equal opportunities for workers, and an accessible and inclusive service for residents.

##### **PROTECTED CHARACTERISTICS**

<b>Age: Young People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
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Potential impacts:	No disproportionate impact identified
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Mitigations:	
<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Some older people may: <ul style="list-style-type: none"> <li>• Be less likely to hear an alarm being raised by patrolling wardens.</li> <li>• Respond slower to an alarm being raised</li> <li>• Require assistance to evacuate safely.</li> <li>• Require information in accessible formats.</li> </ul>
Mitigations:	<ul style="list-style-type: none"> <li>• We will encourage tenants to come forward with any concerns or support needs</li> <li>• Work with Housing Officers and caretakers, who have local knowledge and day to day contact with residents, to identify vulnerable residents.</li> <li>• Work with Waking Watch providers to ensure awareness of any residents who may need assistance to evacuate.</li> <li>• Work with all of the above to ensure appropriate Personal Emergency Evacuation Plans are in place.</li> <li>• Upon the arrival on scene of Avon Fire and Rescue, Waking Watch supervisor to provide lead Fire Fighter with any such information for the affected block.</li> </ul>
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Some Disabled people may: <ul style="list-style-type: none"> <li>• Be less likely to hear an alarm being raised by patrolling wardens (nb people with hearing loss may not hear alarms or loud hailers and may have particular concerns about being 'missed' in an evacuation)</li> <li>• Respond slower to an alarm being raised</li> <li>• Require assistance to evacuate safely.</li> <li>• Have addition questions or concerns regarding changing advice about what they should do in the event of a fire.</li> <li>• May need to be informed of Waking Watch and revised evacuation policies in other methods than conventional written media (e.g. is they have sight loss or if they are a Disabled person with learning difficulties).</li> </ul>
Mitigations:	<ul style="list-style-type: none"> <li>• Encourage tenants to come forward with any concerns or support needs</li> <li>• Work with Housing Officers and caretakers, who have local knowledge and day to day contact with residents, to identify vulnerable residents.</li> <li>• Work with Waking Watch providers to ensure awareness of any residents who may need assistance to evacuate.</li> <li>• Ensure letters, posters and launch information are clear and understandable.</li> <li>• Work with all of the above to ensure appropriate Personal Emergency Evacuation Plans are in place.</li> <li>• Offer to provide support workers, friends or family with Waking Watch information</li> <li>• Upon the arrival on scene of Avon Fire and Rescue, Waking Watch supervisor to provide lead Fire Fighter with any such information for the affected block</li> <li>• Particular effort must be made to identify and communicate with residents who have difficulty with written media</li> <li>• Follow specific guidance e.g. <a href="#">Supporting residents in isolation</a> and <a href="#">Disability residents and isolation</a></li> </ul>
<b>Sex</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	No disproportionate impact identified
Mitigations:	
<b>Sexual orientation</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Potential impacts:	No disproportionate impact identified
Mitigations:	
<b>Pregnancy / Maternity</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	People who are pregnant or caring for infants may have additional questions or concerns about evacuating safely.
Mitigations:	<ul style="list-style-type: none"> <li>• Encourage tenants to come forward with any concerns or support needs</li> <li>• Work with Housing Officers and caretakers, who have local knowledge and day to day contact with residents, to identify vulnerable residents.</li> <li>• Work with Waking Watch providers to ensure awareness of any residents who may need assistance to evacuate.</li> <li>• Work with all of the above to ensure appropriate Personal Emergency Evacuation Plans are in place.</li> <li>• Upon the arrival on scene of Avon Fire and Rescue, Waking Watch supervisor to provide lead Fire Fighter with any such information for the affected block</li> </ul>
<b>Gender reassignment</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Race</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Some tenants for whom English is an additional language may not understand written information or signs, which could increase their risk of not following proper fire escape procedure.
Mitigations:	We will ensure that translated versions of letters and posters to inform residents of blocks of flats of the changes in evacuation procedure and the service provided by Waking Watch are available in community languages.
<b>Religion or Belief</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	No disproportionate impact identified
Mitigations:	
<b>Marriage &amp; civil partnership</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	No disproportionate impact identified
Mitigations:	
<b>OTHER RELEVANT CHARACTERISTICS</b>	
<b>Socio-Economic (deprivation)</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Much of our housing stock is in the most deprived areas of Bristol and BCC residents are more likely to be impacted by socio-economic factors. There may also be lower levels of educational attainment in deprived areas. Tenants with reading and writing difficulties may find information concerning fire escape procedures difficult to understand.
Mitigations:	Policies and procedures must take the impact of deprivation in account, especially in relation to the built environment. Fire escape procedures and related information must be clear and understandable for all.
<b>Carers</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Carers may be particularly concerned about how those they care for will be able to manage in the event of an evacuation and may have questions or concerns about perceived risk
Mitigations:	Carers should, where appropriate, be involved in and should be made aware of the Personal Emergency Evacuation Plan for their client or family member/friend, both to provide reassurance but also because they may be present in the event of a fire and it is important that they understand and cooperate with any evacuation plans which are in place.
<b>Other groups</b> [Please add additional rows below to detail the impact for any other relevant groups as appropriate e.g. asylum seekers and refugees; care experienced; homelessness; armed forces personnel and veterans]	
Potential impacts:	

Mitigations:	
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### 3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our [Public Sector Equality Duty](#) to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

All residents within a Waking Watch block will benefit from increased fire safety. The DPS will allow the opportunity for community groups to join, so that there is the potential for the service to be provided from within the local community which will also help to increase equality of opportunity and foster good relations between people who share a protected characteristic and those who don't.

## Step 4: Impact

### 4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

**Summary of significant negative impacts and how they can be mitigated or justified:**

No negative impact. Improvements in fire safety have been identified, however, as recognised in 3.1 above, the communication and implementation of new evacuation policies may present challenges for some protected characteristic groups, and these must be considered and mitigated against to ensure equality of opportunity.

**Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:**

The policy will promote equality of opportunity through overall improvements in fire safety.

### 4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Contract Management	Fire Safety Team Supervisor and Project Surveyor	Throughout
Ongoing tenant liaison	Fire Safety Team Supervisor and Project Surveyor	Throughout

### 4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

Resident feedback




Contractor Performance – Data records, performance indicators, complaints.

Feedback from internal departments/BCC staff

## Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director<sup>1</sup>.

<b>Equality and Inclusion Team Review:</b> <i>Equality and Inclusion Team</i>	<b>Director Sign-Off:</b> Fiona Lester, Director of Homes and Landlord Services 
Date: 21/11/2024	Date: 22/11/2024

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<sup>1</sup> Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.