



EQIA for Enhanced Enforcement Concession Procurement

Bristol City Council Equality Impact Assessment Form

Name of proposal	Enhanced Enforcement Service
Directorate and Service Area	Communities/Neighbourhood Services
Name of Lead Officer	Kurt James

Step 1: What is the proposal?

Please explain your proposal in Plain English, avoiding acronyms and jargon. This section should explain how the proposal will impact service users, staff and/or the wider community.

1.1 What is the proposal?

To introduce an Enhanced Enforcement Service to address the Mayor's commitment to make Bristol's streets measurably cleaner by 2020.

A pledge that Bristol would be measurably cleaner by 2020 was a central commitment of the Mayor's manifesto and it is a key priority in Bristol City Council's 2018-2019 Business Plan and 2017-2022 Corporate Strategy. The proposed Enhanced Enforcement Service sits within the Clean Streets Plan and alongside the recently refreshed [Towards a Zero Waste Bristol: Waste and Resource Management Strategy](#). The main aim of the plan is prevention: encouraging individuals to take personal responsibility to make sure that waste does not pollute the environment in the first place.

There are three main themes in the plan, adopted from the [Litter Strategy for England](#) :

- **Theme 1: Send a clear message** – so that we can develop a shared understanding of acceptable and unacceptable behaviour and to motivate people to do the right thing.
- **Theme 2: Clean up the city** - a clean environment helps to send a signal that dropping litter or committing environmental crime is not socially acceptable in that area.
- **Theme 3: Improve enforcement against offenders** – strengthening the deterrent effect of legislation.

The Enhanced Enforcement Service will reinforce work being undertaken across the city to tackle street scene issues.

Step 2: What information do we have?

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

The plan will impact on every resident in Bristol therefore the plan affects the population of Bristol, namely:

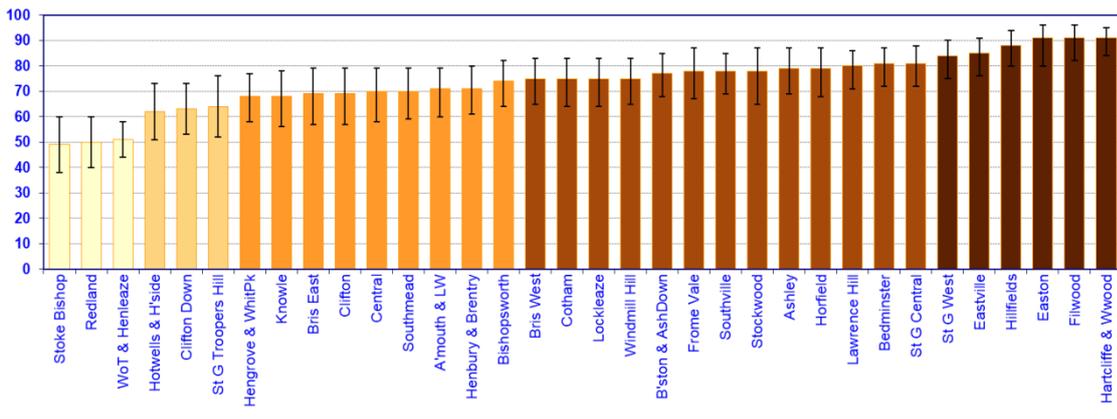
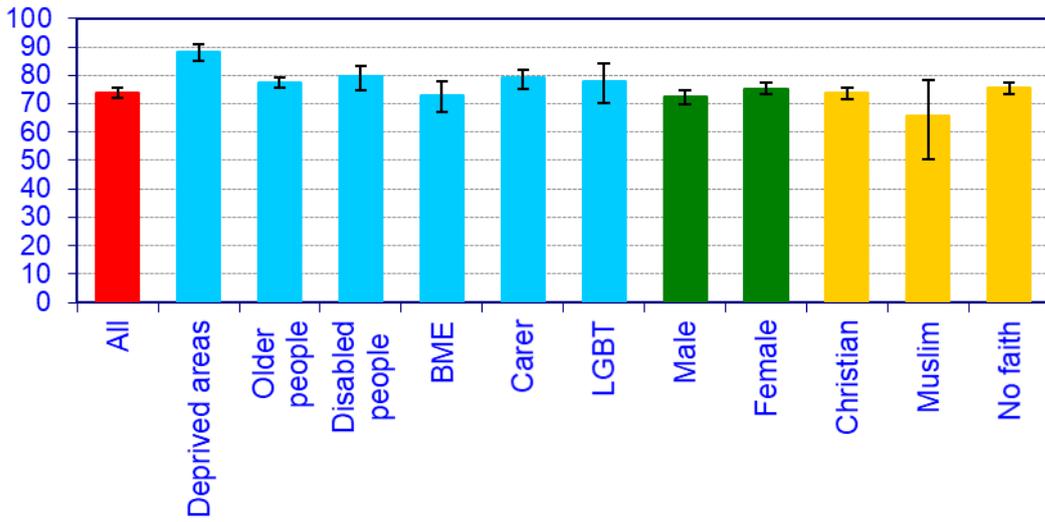
	Demographics in Bristol are %
Aged 15 and under	18.70%
16-24	15.60%
65 - 74	6.90%
75 and over	6.20%
Men	49.90%
Women	50.10%
People with a disability or long term limiting illness total	16.70%
White British	77.90%
White – non-British	6.10%
Black and minority ethnic	16%
Civil partnership	0.30%
People whose main language is not English	8.50%
% Born in the UK	85.30%
% resident in UK for less than 5 years	5.10%
Lone Parent Household	12%

Bristol City Council's annual Quality of Life Survey highlights that litter, dog fouling and other street scene issues are of particular concern to Bristol residents.

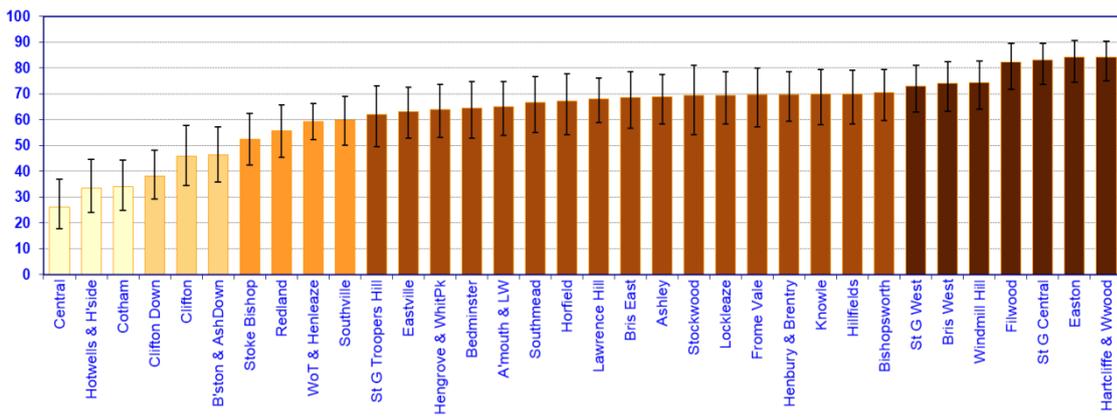
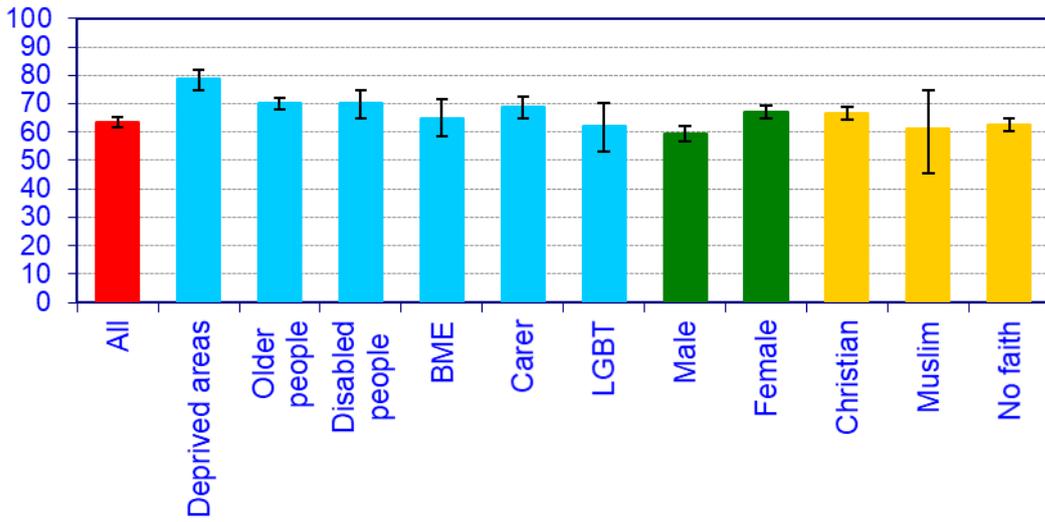
- According to our 2015/16 Quality of Life survey 73.8% of people who responded identified street litter as a problem.
- 63.4% of residents felt that dog fouling was a problem in their local area.
- 30.3% of respondents identified anti-social graffiti as a problem.
- These issues can be more pronounced in the city centre and some of the more deprived areas of Bristol. For example, graffiti was seen as a problem for 47% of QOL respondents in the city Centre and by over 60% in Ashely Ward.

Quality of Life 2015/16 findings:

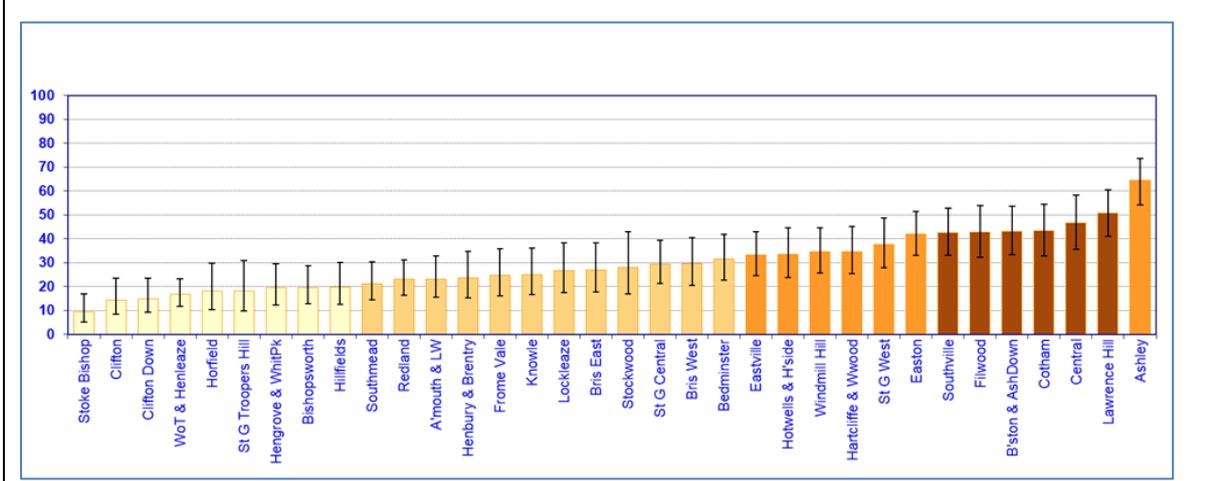
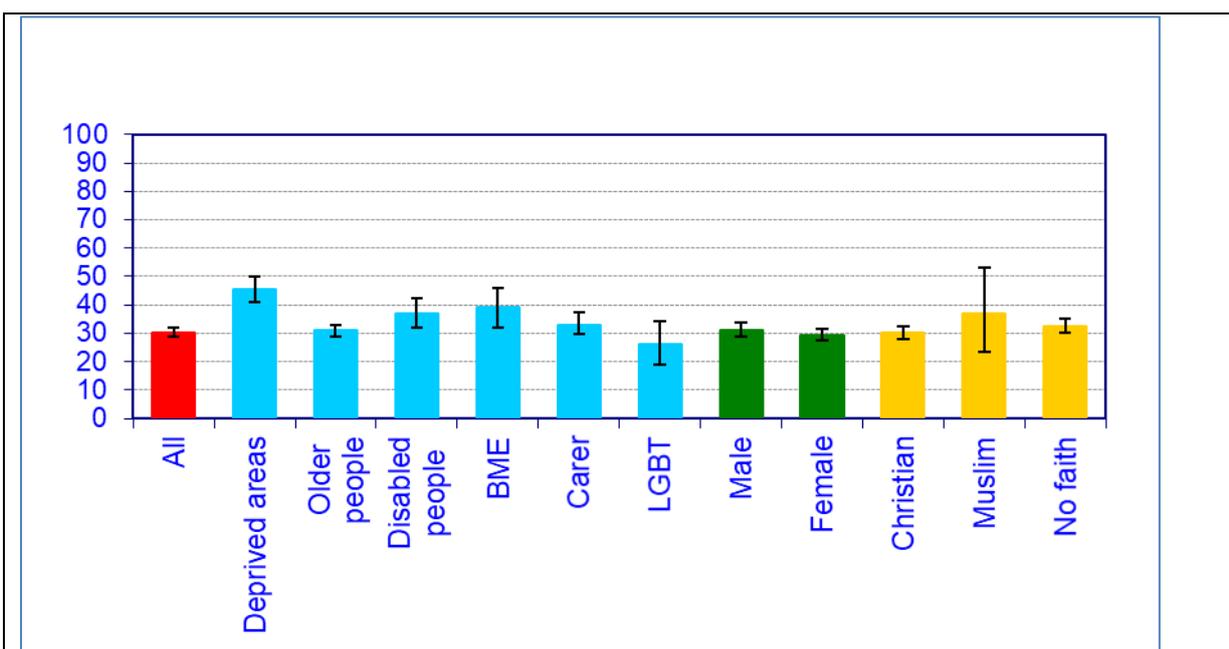
% respondents who think street litter is a problem



% respondents who think dog fouling is a problem in local area



% respondents who agree anti-social graffiti is a problem



Evidence from the annual Quality of Life survey noted above indicates that equalities groups and people living in more deprived parts of the city currently tend to be more adversely affected by street scene issues than the population in general. These findings are supported by more general [research](#) by groups such as Keep Britain Tidy who have also noted that deprived areas tend to suffer the most from poor local environmental quality and that those living in more deprived areas are less likely to feel satisfied with the appearance of their local area than those living in more affluent areas.

Therefore, the Enhanced Enforcement Service which will take a more robust approach to tackling street scene issues are viewed as being of overall benefit to people with protected characteristics.

2.2 Who is missing? Are there any gaps in the data?

The plan and Enforcement Service outlines proposals to identify the hotspot areas in Bristol that need more intensive improvement work through intelligence gained from BWC, councillors, partnership structures, and enforcement teams. It is probable that there will be a correlation between those hotspots and areas scoring high on the Indicators for Multiple Deprivation data for example, which would have a disproportionate impact on equalities

communities/people with equalities characteristics.

There is extensive research into how to impact on behaviours, and some of this relates to people with protected characteristics. Overall behaviour change campaigns to reduce environmental crime will be most successful amongst population groups who believe in and or have knowledge of the wider social and environmental benefits of keeping their local neighbourhoods and communities clean and tidy. Outreach projects with BME communities and faith communities indicate there is real value in developing materials which connect to the values of different communities.

For example in 2006 Grounds for Change co-ordinated a targeted campaign to increase participation in recycling services by black and minority ethnic groups in Bristol.

The project developed publicity materials which included multi-lingual materials focused on graphic explanation, clarity and brevity of texts and the campaign message, "Make a Better Future for Your Children – Recycle!". A separate leaflet was produced linking Islam and recycling with the title, 'Do not be Wasteful' (Qur'an 7:31): Save the Earth and Recycle'. This leaflet was developed by BME workers in consultation with local religious and community leaders:

http://www.wrap.org.uk/sites/files/wrap/BCLF_Bristol_15.09.08.5866.pdf

Evidence suggests that interventions to tackle street scene issues such as littering are less successful if they only adopt a narrow approach to deterring environmental crime. For example, [research](#) by Keep Britain Tidy found that enforcement alone was not enough to bring about behaviour change and concluded that in order to achieve a lasting change in behaviour, it was essential that enforcement was used as part of a wider strategy that also included engagement with, and education of, the local community.

Although it is individuals who drop litter, research suggests that more successful interventions go beyond looking at the individual and also consider such issues as 'peer group pressure' and the impact that the wider environment can have on an individual's behaviour. We know, for example, that people behave differently in different environments, with different groups of people and at different stages of their lives. We also know that people drop less litter in clean environments. In their [literature review](#) of existing littering behaviour studies, Zero Waste Scotland noted that: 'An individual's feelings about and relationship to the community and the spaces around them can affect their willingness to litter'.

Taken together, much of the available research tends to indicate that:

- Approaches which adopt a narrow approach (relying solely on enforcement action for example) are less successful in bringing about long term behaviour change.
- Interventions need to consider the wider environment, and the services and facilities available which can influence and shape individual behaviour change.

The approach adopted in the Clean Streets plan emphasises education/information and community engagement alongside the proposed more robust approach to enforcement. Promotional/educational campaigns have been successful in overcoming barriers to engagement around street scene and waste related issues. For example, a project in Bexley promoting recycling to residents of high and low rise flats and found the key to greater engagement in recycling services was to first understand the barriers (perceived or real) followed by the use of appropriate literature to address the issues raised in order to overcome the barriers.

http://www.wrap.org.uk/sites/files/wrap/BCLF_Bexley_15.09.08.5864.pdf

Overall, it is felt that as equalities groups are currently more adversely affected by street scene issues than the population in general, the proposals in the Clean Streets Plan to take a more robust approach to tackling street scene issues will be of overall benefit to people with protected characteristics. However, in order to mitigate any negative impact for groups that may potentially be disadvantaged by changes proposed in the Clean Street's Plan and the Enhanced Enforcement Service, promotional and educational campaigns and engagement with communities will be undertaken in advance.

2.3 How have we involved, or will we involve, communities and groups that could be affected?

Embedding the campaign in Bristol Culture – We have maintained a high media profile with articles in Bristol Post, Bristol 24/7, the Guardian and local magazines; BBC TV, ITV and Made in Bristol TV; and Radio Bristol, Heart and Ujima Radio. There is a rolling behaviour change twitter message programme being sent out by BCC and BWC on a daily basis. We have sent campaign information to 195,000 households in the council tax booklet.

Provide a quality cleansing service – We have reconfigured the waste collection service on Stapleton Road with the result that recycling went up by 16.7%, and refuse went down by 40.9%. We are working with Bristol University and UWE to improve the management of student waste issues. BWC delivered the chewing gum behaviour change campaign in Broadmead which saw a 64% drop in chewing gum litter in the study area and new chewing gum removal techniques have been introduced in Broadmead and on Park Street.

Supporting everyone to do their bit – We have purchased 250 new litter pickers and branded high visibility vests which are managed by BWC and made available to support community clean ups. We have more than tripled the number of Eco and provided litter picking kits to 30 primary and secondary schools; supporting and participating in community clean ups. We organised the Great Bristol Spring and Autumn Clean Ups which have seen 140 Community Clean Ups, with 2,414 participants with 2,222 bags of litter removed over the last year. We organised a 'Poo Patrol Big Spray Day' which saw 25 schools and 25 community groups or representatives participating in May and June 2017. This has seen a 50% drop in dog fouling in the project areas.

Enforce where needed – The Enhanced Enforcement Concession pilot project started in November 2017, has met its objectives and provided a bridge to a longer term enforcement service tender scaled to take into account Bristol's enforcement needs and aspirations.

Between 6 November 2017 and 30 June 2018 this new enforcement service has issued 8,100 fixed penalties notices to people committing environmental crimes in Bristol. With this additional resource the issue of Fixed Penalty Notices has increased significantly.

Step 3: Who might the proposal impact?

3.1 Does the proposal have any potentially adverse impacts on people with protected characteristics?

Street scene services and street scene enforcement are carried out citywide and there have been no reported incidents of discrimination. In order to mitigate any negative impact for groups that may potentially be disadvantaged by changes proposed in the Clean Street's Plan and Enhanced Enforcement Service, promotional and educational campaigns and engagement with communities will be undertaken in advance.

3.2 Can these impacts be mitigated or justified? If so, how?

We will consider differentiated communication materials and lead in times to engage effectively both with geographical communities and with communities of interest.

Will provide information in community languages and include language tag in information https://www.bristol.gov.uk/en_US/people-communities/the-language-tag-or-block

3.3 Does the proposal create any benefits for people with protected characteristics?

Tackling street scene issues more robustly through the Enhanced Enforcement Service can have benefits for everyone, including equalities groups. For example:

- Fly tipping - Can cause obstructions to pavements and public highways and can have a negative impact on older people and people with disabilities or mobility issues.
- Graffiti – Can be racist, homophobic or otherwise offensive. Graffiti can also have an impact on older and more vulnerable residents as it can make an area feel less safe.
- Litter – Can make an area feel less cared for and less safe, which is an issue for older and more vulnerable residents.
- Dog fouling – Dog fouling is a nuisance to both residents and visitors to the city. Dog fouling can also be dangerous, particularly to young children, as they can contract serious illnesses such as Toxocariasis (round worm infection) from dog faeces.

[Research](#) conducted by Keep Britain Tidy found that deprived areas tend to suffer the most from poor local environmental quality and that those living in more deprived areas are less likely to feel satisfied with the appearance of their local area than those living in more affluent areas.

3.4 Can they be maximised? If so, how?

The plan and Enhanced Enforcement Service outlines proposals to identify the hotspot the hotspot areas in Bristol that need more intensive improvement work through intelligence gained from BWC, councillors, partnership structures, and enforcement teams; and programme future activity to address them to include enforcement campaigns, dog warden activity, repair, reuse and recycling support and enhanced cleansing support.

As evidence suggests that groups with protected characteristics are currently more affected by street scene issues such as litter, it is anticipated that this approach will benefit groups with protected characteristics.

Step 4: So what?

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

Equalities considerations have been taken into account in drafting the Plan and the Enhanced Enforcement Service. The Plan makes it clear that educational and community engagement initiatives will be used alongside a more robust approach to enforcement in order to drive behaviour change. The Waste Policy Statements that have been published include information on what can be expected from the Council (and its waste contractor) and what residents themselves should do to minimise potential waste and street scene issues.

The revised policy statement on 'Communication: Education and Raising Awareness' recognises that a range of communication methods may be required to engage with communities and notes that:

- We will, where necessary, tailor communication and education messages in order to address specific waste, recycling and street scene issues within communities.

Similarly, the revised policy on waste collection contains information for residents, (including information about possible enforcement sanctions) with regard to people leaving their bins out on the pavement after collection. Bins left on pavements after collection can cause obstructions for passers-by and can be a particular problem for older people or people with disabilities or mobility issues as well as for young mothers with prams.

As stated throughout this assessment, as equalities groups are currently more adversely affected by street scene issues than the population in general, the proposals in the Clean Streets Plan and Enhanced Enforcement Service to take a more robust approach to tackling street scene issues are seen to be of overall benefit to people with protected characteristics.

4.2 What actions have been identified going forward?

The Plan and Enhanced Enforcement Service is clear that it is not adopting an enforcement only approach and will also focus on education and community development approaches. These actions are of particular relevance for equalities communities.

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

The actions and proposed interventions will need to include monitoring impact by equalities community.

Service Director Sign-Off:



Date:15/08/2108

Equalities Officer Sign Off:



Duncan Fleming

16/7/2018