

## Bristol City Council Equality Impact Assessment Form

(Please refer to the Equality Impact Assessment guidance when completing this form)



<b>Name of proposal</b>	Advancing equality and inclusion: new actions for 2020/21
<b>Directorate and Service Area</b>	Resources: Policy, Strategy and Partnerships
<b>Name of Lead Officer</b>	Tim Borrett, Director: Policy, Strategy and Partnerships

### 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?

Investment in a range of internal actions designed to improve diversity in the workforce and increase the quality of the council's performance on race equality. This includes over 50 actions including the application of Positive Action principles in talent management and recruitment for the council.

### Step 2: What information do we have?

Decisions must be evidence-based, and involve people with protected characteristics that could be affected. Please use this section to demonstrate understanding of who could be affected by the proposal.

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

##### Policy and context

Race in the Workplace – The McGregor Smith Review is a 2017 Independent review considering the issues affecting black and minority ethnic (BME) groups in the workplace. It highlights the pervasive, unconscious structural and historic bias that favours certain individuals and creates barriers that hinders workplace development on the basis of peoples' ethnicity and background  
<https://assets.publishing.service.gov.uk/government/uploads/system/uploads>

[/attachment\\_data/file/594336/race-in-workplace-mcgregor-smith-review.pdf](/attachment_data/file/594336/race-in-workplace-mcgregor-smith-review.pdf)

The Bristol Race Equality Manifesto sets out a ‘blueprint’ of principles and actions for multi-agency partners to promote race equality in the city  
<https://www.bristol.gov.uk/documents/20182/2979159/Manifesto+for+Race+Equality+March+2015.pdf/6530ff6b-8e36-8d6a-cd60-c8e49a70d8ee>

The council has a long-standing commitment to equality, diversity and inclusion. Within its Corporate Strategy 2018 – 2023 the council committed to “Make sure we have an inclusive, high-performing, healthy and motivated workforce.” However an LGA Peer Challenge in 2018 noted of our intentions: “this is positive but very much work in progress and BCC knows it has to further invest in and drive its own equality, diversity and inclusion strategies to keep pace with those of the city as a whole.”

In 2018 we commissioned an independent review of the council’s equality and diversity function<sup>1</sup>. This report made a number of recommendations which informed an updated Equality and Inclusion Policy and Strategy.

Our [Equality and Inclusion Policy and Strategy 2018-23](#)<sup>2</sup> sets out our commitment to equality and diversity including Equality Objective E02 – “To build an inclusive organisation where the workforce reflects the city we serve and the needs of all citizens, and where colleagues feel confident about being themselves at work”.

### **Race disparity in Bristol City Council**

The recommendations in this proposal explicitly prioritise race equality and seek to address the structures, processes and practice that contribute to institutional and structural racism within the council.

The city-wide [Bristol Race Equality Strategic Leadership Group](#) is Chaired and supported by Bristol City Council. The group was set up in response to the Manifesto for Race Equality, to bring together all public sector organisations in the city to work collaboratively to tackle the endemic issues that the Manifesto raised. The key strategic challenge set by the group was to work collaboratively to share our Equality related HR data with the vision of producing a data picture of all Public Sector employment in Bristol. Through positive partnership

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<sup>1</sup> Review of Bristol City Council’s Equality And Diversity Function - June 2018; Report Author: Kamaljit Poonia

<sup>2</sup> <https://www.bristol.gov.uk/people-communities/equalities-policy>

working the Leaders group produced and formally launched the first, ever award winning, Public Sector Race Equality Data product for Bristol<sup>3</sup>. This first data picture, given the importance of the Public Sector as an employer now clearly sets out the challenge.

### **Recruitment and representation**

The overall percentage of our Black, Asian and minority ethnicity workforce has increased from 10.5% in 2017 to 12.72% in 2019 – compared to 12% for Bristol Economically Active Citizens, and 16% for the Bristol BAME population as a whole (Census 2011)<sup>4</sup>

In 2019 20.98% of council job applications were from Black, Asian or minority ethnic candidates, compared to the working age Bristol Black, Asian and minority ethnic population of 13%. 17.5% of shortlisted candidates were Black, Asian or from minority ethnic groups, and 13.7% of those offered jobs were to Black, Asian or minority ethnic applicants. Therefore, there is some variance from application to jobs offered.

There is a disproportionately large number of Black, Asian or minority ethnic employees on fixed term contracts. The low retirement figure coupled with the high number of fixed term contracts suggests that employees who are Black, Asian or from minority ethnic groups have a younger age profile in our workforce.

### **Pay**

There is a mean ethnicity pay gap of 12.06% and a median pay gap of 17.56% due to the lack of senior roles occupied by relevant colleagues. In 2019 only 4.35% of those council employees earning £50k+ were Black, Asian or from minority ethnic groups. However this race pay gap has been reducing year on year and was 15.38% in 2016-17. The percentage difference in progression rate of Black, Asian or minority ethnic employees and White British employees is 1.09%.

### **Grievance and disciplinary**

Staff who are Black, Asian or from minority ethnic groups are statistically more likely to be subject to formal grievance (33% of all grievances) and

<sup>33</sup> <https://www.bristol.gov.uk/documents/20182/2979159/Race+Equality+Data+Report.pdf/c17dd489-3149-0660-609b-b3995cd2c2f0>

<sup>4</sup> We have used diversity data from Bristol Local Authority economically active population (Source: Annual Population Survey Oct-18 - Sep-19 ONS) as a benchmark for comparison, however we acknowledge that a proportion of council employees live outside of the Bristol local authority boundary.

disciplinary (17.65%).

### Views of employees

Our 2019 employee engagement survey tells us 73% of respondents report that they agree or strongly agree that “I feel able to be myself in the workplace”; 76% feel ‘I am treated fairly by Bristol City Council’, and 71% of staff said they believe the council is committed to creating a diverse and inclusive environment. We also asked specifically about protected characteristics including the question “I am not treated inappropriately or unfairly because of my Ethnicity”.

“I am not treated inappropriately or unfairly because of my Ethnicity”:	
Strongly agree	37%
Agree	45%
Neither agree nor disagree	14%
Disagree	3%
Strongly disagree	2%
Not applicable	-

### Covid-19

Public Health England (PHE) has published a national review of disparities in COVID-19 risks and outcomes. National data from Office for National Statistics (ONS) shows marked disparities in mortality and health outcomes for some groups including Black and Asian people, older people, disabled people, and men.

The rate of deaths involving Covid-19 for Black males in England and Wales is 3.3 times greater than that for White males of the same age, while the rate for Black females is 2.4 times greater<sup>5</sup>

These deaths do not appear consistent across Black, Asian and minority ethnic groups. As well as other issues identified below, a contributing factor is likely to be the result of an intersection of several other factors including the overrepresentation of Black populations in lower socio-economic groups, disproportionate employment in lower band key worker roles, as well as where

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<sup>5</sup> ONS May 2020

people live, overcrowded housing, other illnesses and access to health services<sup>6</sup>.

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

There are gaps in our diversity data for some protected characteristics citywide, especially where this has not historically been included in census and statutory reporting e.g. for sexual orientation.

We also know there are some gaps in our workforce diversity information - especially where personal and confidential information is voluntarily requested from staff.

Although our workforce diversity monitoring uses established categories<sup>7</sup> for recording ethnic group and religion, corporate reporting has historically aggregated this data into broader categories such as 'Black and Minority Ethnicity'. Our future reporting will have more detail to make it easier to identify and address any disparity for particular groups. This information will support the Council with any future workforce planning.

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

The recommendations from DWC Consulting have been informed by extensive engagement throughout the council, including with:

- Staff Led Groups
- Senior leadership
- Internal teams: HR, Organisational Development, Equality and Inclusion, Policy and Strategy, Housing Services etc.

We will continue to listen and act on Black and Asian staff feedback.

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

Analysis of impacts on people with protected characteristics must be rigorous. Please demonstrate your analysis of any impacts in this section, referring to all of the equalities groups as defined in the Equality Act 2010.

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<sup>6</sup> The impact of COVID-19 on black, Asian and minority ethnic communities; National Institute for Health Research and University of Bristol <https://arc-w.nihr.ac.uk/Wordpress/wp-content/uploads/2020/05/COVID-19-Partner-report-BAME-communities-BCC001.pdf>

<sup>7</sup> <https://www.ons.gov.uk/methodology/classificationsandstandards/measuringequality/ethnicgroupnationalidentityandreligion>

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

Whilst we have not identified any direct negative impact from the recommendations at this stage we need to ensure that they are implemented in a way which does not indirectly discriminate against people on the basis of their Race or other protected characteristics.

Adverse media reporting and/or a poor internal reception of the appended independent report by DWC Consulting could impact on the wellbeing or mental health of employees; particularly colleagues suffering from any stress or anxiety related to individual HR cases which are alluded to in the report; or managers suffering from anxiety, stress or mental ill-health.

We also need to ensure that by explicitly prioritising race equality in these recommendations we are not seen to be ignoring or minimising other aspects of structural inequality.

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

We propose to invest in a range of internal-facing actions (set out in Appendix Ai) designed to improve diversity in the workforce and increase the quality of the council's performance on race equality.

Rather than being 'owned' by one team or group, these actions will be embedded across the council's business in policies, strategies and operational practice – to ensure the equality, diversity and inclusion agenda is shared by the whole workforce.

To mitigate the risks of misinterpretation highlighted above we will work with the Internal Communications team to ensure that the recommendations regarding positive action are well understood. We will communicate that the recommendations are part of a large number of organisational improvements which address intersectional issues and help to fulfil our public sector duty to tackle discrimination harassment and victimisation, promote equality of opportunity and foster good relations between those who share a protected characteristics and those who do not.

#### **Covid-19 Response**

We have a dedicated [intranet \(The Source\) page](#) for up-to-date information and have set up an email address for staff queries related to our response to Coronavirus. We have introduced new guidance for Managers of staff who are self-isolating or shielding because of coronavirus (Covid-19) to ensure employees are treated fairly.

The council has personally written to all Black, Asian and minority ethnic staff, stating the Council’s commitment in ensuring that their health, safety and wellbeing will be paramount and that their working environment will be safe at all times.

Staff health and wellbeing is one of the top priorities in our Organisational Improvement Plan. We have launched a tool<sup>8</sup> to help employees discuss and keep a record of the support and arrangements in place to benefit their health and wellbeing. We have also launched a new vulnerable persons’ risk assessment tool and associated guidance to help colleagues working with their managers to assess risk in the workplace and put appropriate measures in place where necessary.

We are working as part of a multi-agency response to implement the policy recommendations of the recent rapid review “The impact of Covid-19 on black, Asian and minority ethnic communities” – including ensuring adequate income protection for those in low paid or precarious employment, reducing occupational risks (e.g. providing appropriate PPE), and providing culturally and linguistically appropriate public health communications<sup>9</sup>.

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

There should be positive impacts for staff from under-represented groups, particularly Black and Asian colleagues and those from other minority ethnic groups, in accessing more opportunities within the council and benefitting from better management practice and leadership on race equality issues.

Improving overall organisational diversity and performance in relation to equalities practice could have positive impacts in all areas of service provision.

### **3.4 Can they be maximised? If so, how?**

By embedding the recommendations across the council via Learning and Development; HR; and Service area Equality Action Plans etc.

## **Step 4: So what?**

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<sup>8</sup> Internal link only

<sup>9</sup> <https://arc-w.nihr.ac.uk/Wordpress/wp-content/uploads/2020/05/COVID-19-Partner-report-BAME-communities-BCC001.pdf>

The Equality Impact Assessment must be able to influence the proposal and decision. This section asks how your understanding of impacts on people with protected characteristics has influenced your proposal, and how the findings of your Equality Impact Assessment can be measured going forward.

<b>4.1 How has the equality impact assessment informed or changed the proposal?</b>
Consideration of the potential impact of council activities on people on the basis of their protected characteristics has been central to the development of these recommendations. Specifically this EqIA has highlighted the need to ensure sensitive internal communications to avoid misunderstandings or faulty implementation of the proposed actions which many managers need to take.
<b>4.2 What actions have been identified going forward?</b>
Establish formal targets, timescales and process for diversity in leadership.
<b>4.3 How will the impact of your proposal and actions be measured moving forward?</b>
<ul style="list-style-type: none"> <li>- Regular HR Diversity Metrics and other new formal targets</li> <li>- Annual Pay Gap Report</li> <li>- Regular Reporting structures</li> <li>- Annual Staff Satisfaction Surveys</li> <li>- Feedback and liaison with BMEEG and other Staff Led Groups</li> </ul>

Service Director Sign-Off: Tim Borrett, Director: Policy, Strategy and Partnerships	Equality and Inclusion Officer Sign Off: Hilda Bertie, Head of Equality and Inclusion
Date: 03/07/2020	Date: 03/07/20