

Equality Impact Assessment [version 2.9]



Title: Bristol Modern Slavery Transparency Statement	
<input checked="" type="checkbox"/> Policy <input checked="" type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: People	Lead Officer name: Lynne Bosanko
Service Area: Children and Families	Lead Officer role: Crime Reduction officer

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 \(EqIA\) \(sharepoint.com\)](#).

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.

The Bristol City Council Modern Slavery Transparency Statement outlines the Councils' actions to understand and address all potential modern slavery risks in relation to our own business and supply chains. Modern slavery includes slavery, human trafficking, forced and compulsory labour, servitude, and organ harvesting for profit.

The Modern Slavery Act 2015 requires businesses disclose steps they take for themselves and their supply chains to reduce and avoid modern slavery. Disclosures are mandatory for businesses with a turnover of £36m or more. The Home Office have announced it the intention that this requirement is to be extended to public sector bodies later this year.

It is recognised that Councils are uniquely placed to be at the forefront of the fight against modern slavery and are demonstrating awareness and ethical leadership by voluntarily completing modern slavery transparency statements. There is support in Bristol for publishing a Statement in the autumn this year.

The Statement is also aimed at protecting, identifying, and supporting potential victims of modern slavery and putting into place any measures to contribute to addressing modern slavery with our partners.

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 checked="" type="checkbox"/> The wider community
<input checked="" type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments: there is a workforce development investment recognised and required		

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: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

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 \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

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 \(sharepoint.com\)](#) 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](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
<ul style="list-style-type: none"> - Modern Slavery Guidance for Wales and England (under s49 of the Modern Slavery Act 2015) and Non-Statutory Guidance for Scotland and Northern Ireland - Modern Slavery: Statutory Guidance for England and Wales (publishing.service.gov.uk) - Transparency Statements: A practical Guide - https://www.gov.uk/government/publications/transparency-in-supply-chains-a-practical-guide/transparency-in-supply-chains-a-practical-guide#annex-e---information-in-a-slavery-and-human-trafficking-statement - Local Government Association – Modern Slavery - Modern slavery Local Government Association - United Kingdom Human Trafficking Centre (UKTHC) 	<ul style="list-style-type: none"> - Legislation and guidance on Modern Slavery - Advice on Transparency Statements - Data and Statistics on extent of child exploitation including: - differences in exploitation patterns on the basis of age, sex etc. - Data on poverty and deprivation

<ul style="list-style-type: none"> - Home Office, National Referral Mechanism Statistics: UK, End of Year Summary, 2020 - County Lines (National Crime Agency, 2019). - Poverty in the UK: statistics - House of Commons Library (parliament.uk) 	<ul style="list-style-type: none"> - patterns used in 'County Lines' drug trade; sexual exploitation etc.
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Additional comments:

10,613 potential victims of human trafficking were identified in 2020 — consistent with the number identified in 2019 (10,616). Home Office, *National Referral Mechanism Statistics: UK, End of Year Summary, 2020*. Since 2015 the identification of victim numbers has increased steadily but not in 2020. This is likely due to the impact of the pandemic on victim identification. While the number of potential adult victims decreased in 2020, the number of potential child victims increased.

There is no typical victim of slavery – victims can be men, women and children of all ages, ethnicities and nationalities and cut across the population. It is more prevalent amongst the most vulnerable, and within minority or socially excluded groups.

Poverty, limited opportunities at home, lack of education, unstable social and political conditions, economic imbalances, and war are some of the key drivers that contribute to vulnerability to becoming victims of Modern Slavery. In addition, victims can often face more than one type of abuse and slavery, for example if they are sold to another trafficker and then forced into another form of exploitation.

Due to its hidden nature, and that modern slavery is cross cutting often across more than one type of exploitation and across the population and so by its very nature it is a complex crime.

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

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

Globally, nationally, and locally due to the hidden nature of modern slavery, its complexity and that it predominately driven by organised crime its prevalence is known to be difficult to evidence. The Office of National Statistics March 2021 concluded that there is no definitive source of data or suitable method available to accurately quantify the number of victims on modern slavery in the UK.

However, greater awareness, increases in reporting and improvements in police recording are likely to have contributed to the increases seen in potential victim numbers since the introduction of the Modern Slavery Acts across the UK in 2015.

Last year, 2,252 women; 4,545 men; and 3,608 children were identified and accepted support. The National Crime Agency has suggested that there are tens of thousands of victims in the UK at any one time. We do not have accurate data in relation to some characteristics e.g., sexual orientation

and vulnerability to modern slavery. It may be that reporting issues are related to victim's nationality and/or religion.

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. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

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 change 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.

The Modern Slavery Transparency Statement has been produced by following the Home Office guidance, LGA guidance and good practice identified across other Local Authorities. This Statement was developed through the work of a task and finish group which included colleagues from Public Health, Procurement and Safer Communities.

A draft version of the Statement and the underpinning action plan was circulated to Service Directors in May 2021. This provided internal stakeholders including those services who will 'own' several of our commitments with an opportunity to feed into the Statement and action plan and confirm their commitment in delivery.

Guidance has been provided by the Avon and Somerset Anti-Slavery Partnership Co-ordinator from Unseen (Unseen is an anti-slavery charity UK wide).

Direct consultation with our safeguarding managers due to their safeguarding role and prevalence of staff who are First Responders to improve the victim referrals pathways for adult and children and ensure are transparent.

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.

The governance and engagement with stakeholders are set out in the Statement and the high-level action plan (both are part of the consultation process).

There is the intention that a Task Group/ Delivery group will be appointed by directors to deliver the action plan and report regularly to the Keeping Bristol Safe Partnership (KBSP). Membership will be extended to a member of the Council's Equality and Inclusion team to ensure we consider and mitigate for any indirect discrimination should it arise through the implementation of the Statement and action plan and any future steps going forward.

An annual review of the Statement and action plan is planned and the annually updated Statement to be published on the Council website. The review will involve the wider stakeholders in the Council and reporting through the KBSP.

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 (different kinds of disability, ethnic background etc.) 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)	
We have not identified any direct negative equalities impact from the Modern Slavery Statement. However, we do recognise that there are existing disparities and issues for people in relation to modern slavery on the basis of their protected and other relevant characteristics, which we seek to address where possible through our approach.	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> • Children account for approximately a third of trafficked victims. • The United Kingdom is the most prominent country of origin for trafficked children – a total of 2,874 reported cases • Nearly half (47%) of all potential victims of trafficking - 4,946 victims - were exploited as children: a nearly 10% increase on the previous year. • County Lines: an estimated 27,000 children in England identified as a gang member (Children’s Commissioner, 2019). • 99% of those involved in County Lines are male, however females are underrepresented in the data. Females’ involvement is less likely to be discovered by services, but we know it does happen, and they may be asked to carry drugs and weapons because they are less likely to be suspected than males (National Crime Agency, 2019). Both females and males may be subject to sexual exploitation linked to County Lines. • Children aged 15 to 17 years are those most commonly identified as victims of County Lines exploitation, although those younger and older are also at risk of exploitation (National Crime Agency, 2019). • The exact numbers of children affected by County Lines is unknown as there is currently no systematic data collection (Maxwell et al, 2019). • County lines organised crime targets and grooms' young people to undertake criminal activities • It is increasingly aware that young people are victims and should be safeguarded • Perpetrators are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. • Males are most at risk and those 15-17 years of age.
Mitigations:	See above
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> • Adults are predominantly affected by labour exploitation according to the national figures.
Mitigations:	n/a
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Potential impacts:	<ul style="list-style-type: none"> As victims are predominantly the most vulnerable members of society and in our communities therefore disability can be a factor in some cases – including people with a learning disability or mental health problems. People with learning disabilities are also at risk of being coerced or bullied or groomed into criminal exploitation/ modern slavery. They could also be isolated in their communities or they may be ineligible for support services.
Mitigations:	See above
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> Women and girls account for 99% of victims in the commercial sex industry, and 58% of other sectors in other sectors of forced labour Women and girls are disproportionately targeted and vulnerable (99%) Young males are more likely to be involved in County Lines (99%)
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> We do not have accurate data in relation to sexual orientation and vulnerability to modern slavery. It may be reporting issues are related to victim's nationality and/or religion.
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> Victims of human trafficking and modern slavery are controlled and abused, often sexually and this predominately affects women. Pregnancy may be a trigger for further abuse. There are also potential links with domestic abuse.
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> We do not have accurate data in relation to gender reassignment and vulnerability to modern slavery. It may be reporting issues are related to victim's nationality and/or religion.
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> Victims of modern slavery can be transported to the UK from all over the world. People with language and cultural barriers, and those with little or no English, may be at more risk of exploitation.
Mitigations:	See above
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We do not have accurate data in relation to religious and cultural beliefs and it is wide ranging and challenging to assess the impact
Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Forced marriage is now included in estimates of people in slavery by the International Labour Organization (ILO).
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> The effects of the pandemic have plunged more people into poverty due to a multitude of effects ranging from redundancies, lack of work, illness, threats to businesses and the effects of being further financially vulnerable and susceptible to exploitation through modern slavery.
Mitigations:	The modern Slavery Act 2015 introduces a specific defence for victims who have been coerced to criminal acts to pay off debts or bonds
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	

Mitigations:	
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	<ul style="list-style-type: none"> • Migrants and asylum seekers are vulnerable to modern slavery. Often it occurs in the hotel and food industries, construction, agriculture, fishery, clothing factories and domestic work. • For asylum seekers, trying to find work in another country is very difficult. Not only is there often a language barrier and reams of paperwork, and there is the difficulty of not being able to work etc. and being targeted or coerced into low or unpaid work.
Mitigations:	See above

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

<ul style="list-style-type: none"> • Increase BCC staff awareness which will increase the opportunities of recognising potential victims and them being proactive in offering support, access to the National Referral Mechanism (the national framework for assessing cases and through additional support and provision for individuals can be provided such as housing, support services, legal, medical whilst being assessed). • Transparency improvement throughout all procurement stages. • Opportunities to raise awareness and standards and, provide guidance and support to employers our supply chain. • Reduce the risk of all potential labour force being exploited and abused and in relation to vulnerable adults and children their risk of victimisation and or criminality. • Potential to strengthen our safeguarding of vulnerable adults and children. • Opportunity to prevent modern slavery and help those caught up in this crime break free from exploitation of organised crime perpetrators; whilst at the same time working with our partners to bring perpetrators to justice.

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:
We have not identified any significant negative impacts; however, we are aware that there could be indirect risks not yet identified that could arise during the implementation of the Statement and action plan. Should we become aware of any we would seek to address where possible.
Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

The Statement is aimed at protecting, identifying, and supporting potential victims of modern slavery and to making sure modern slavery does not occur in our own business and our supply chains.

As potential victims of modern slavery are known to be the most vulnerable and in socially excluded groups across all ethnicities, ages, and nationalities – it is expected that positive impact due to increased awareness would increase the visibility for vulnerable groups and individuals will be earlier recognition and actions for support for them.

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
To ensure that the Modern Slavery Transparency Statement action plan includes a clear objective that addresses the need for BCC to have a joined up central data collation on modern slavery victims and their equality characteristics	Clare Sims	By December 2021
To ensure that the Modern Slavery Transparency action plan has a clear objective that addresses the need for BCC to develop an internal central confidential intelligence sharing system to enable information to be shared between key departments/SPOCs	Clare Sims	By December 2021

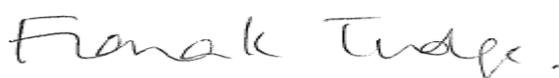
4.3 How will the impact of your proposal and actions be measured?

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.

Our Procurement and Supplier Relations Equality Action Plan 2021- 22 states that the Council will review and adopt a position around modern slavery which is clearly in line with Regulatory considerations plus engaged with our communities and supply chains.

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 Director¹.

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off: Fiona Tudge, Deputy Director, Children, Families and Safer Communities 
Date: 21/7/2021	Date: 16/8/21

¹ 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.

