

Equality Impact Assessment [version 2.9]



Title: Ethical and Equitable Investment Policy (EEIP)	
<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input 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: Resources	Lead Officer name: Glenn Hammons and Gait Collins
Service Area: Finance	Lead Officer role: Interim Head of Corporate Finance and Finance Manager for Transformation

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.

Last updated in 2015, the Ethical and Equitable Investment Policy has been refreshed and co-designed with key stakeholders to ensure alignment to the Council’s values in two ways:

- a. Ethical policies e.g. environment policy, economic and renewal strategy, social value etc
- b. Equitable principles that is, that BCC investment policy should be informed by and address inequalities that are experienced by different sections of the community in Bristol taking into account
 - a. people with characteristics identified in the Equalities Acts including for ethnicity and race, gender, age and disability and where these interrelated – known as ‘intersectionality’.
 - b. People who are socially, economically or environmentally disadvantaged eg people who are living in areas of multiple deprivation or are on very low incomes or otherwise disadvantaged for example in relation to health, education or access to services

The purpose of this policy is to provide guiding principles to ensure Bristol City Council (“the Council”) make investments which are:

- onsistent with the Council’s values framework and ethical policies such as Environmental policy, Economic and Renewal strategy, Social Value and Modern Day Slavery (ethical);
- Inclusive and equitable with regards to access to the Council’s investment funding, and address as well as helping to address economic, social and environmental inequalities and race and ethnicity related inequalities, aligned with policies such as the Council’s Equality and Inclusion Strategy and Social Value policy (equitable);
- Are anti-exclusionary ie inclusive in relation to the economic, social, environmental, racial and ethnicity based disadvantages. And where possible achieve a positive impact in addressing these inequalities alongside a financial return.

To support this, the policy sets out investment principles which are based on three aspects:

- who the Council will not invest in (ethical review 1)
- who the Council wants to invest in (ethical review 2)
- how the Council will ensure investments are equitable (equitable principles)

1.2 Who will the proposal have the potential to affect?

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

Additional comments:
This will affect:

- Current or potential future recipients of investment funding as they will need to show that investments support delivery of the council's ethical and equitable investments policy .
- The wider community as the investment portfolio will seek to provide positive economic, social and environmental impact (including health and education) and positively address disadvantages related to race or ethnicity, minoritisation and other protected characteristics such as gender and age; and people affected by the intersectionality of these inequalities.

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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Equitable investment principles have been incorporated into the policy to achieve two things:

- To enable investments to be used as a lever to address inequalities affecting disadvantaged sections of Bristol's communities including those disadvantaged by race, ethnicity, gender, age and other protected characteristics and where intersectional disadvantage is suffered.
- To reach under-represented groups when it comes to receiving investments, ensuring investments are inclusive and accessible to all.

The principles are:

- Engaging with local disadvantaged groups – to ensure awareness and understanding of investment opportunities, support their ability to seek funding and improve their chances for successful applications.
- Targeting investment. We will place greater weighting on investments which target disadvantage and empower communities. That is investments which :
 - Have positive impact on those experiencing in relation to race and ethnicity, gender, age and other protected and intersecting disadvantages
 - Address economic, social, environmental disadvantage in Bristol
 - Invest in communities and enable greater self-determination and opportunities to engage fully in the economic, social and environmental opportunities provided by Bristol.
- Priority will also be given to investments that achieve positive impact on equalities issues affecting Bristol.

- Improving success – by identifying and removing barriers that prevent disadvantaged groups from applying and successfully securing investments.
- Collecting and monitoring equalities data – collecting equalities data specifically around investments to monitor and track progress and inform a targeted approach.

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
https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/articles/ethnicitypaygapsingreatbritain/2019	Ethnicity pay gaps
https://static1.squarespace.com/static/594948a7414fb5804d2b4395/t/5ec3ee32a5b5c27385219625/1589898876817/Covid19_Report_v2_compressed.pdf	Impact of COVID-19 on BAME Led Businesses, Organisations & Communities
https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/incomeandwealth/bulletins/smallareamodelbasedincomeestimates/financialyearending2018	Income data
http://www.bristol.gov.uk/statistics	Bristol inequalities data

Additional comments:

Inequality in Bristol has increased over the last ten years and so we want investments to help address this.

Some of the data showing this are:

- Income has fallen for the poorest, 1 in 5 are 4% down (3 years for older people)
- House prices have risen 70% in Bristol between 2009 and 2019, with housing affordability ratio rising to 8.89 (average house price to average earnings)
- 17% of children in Bristol live in low income families.
- 19,600 of Bristol households are estimated to be in fuel poverty (2018)

[Income estimates for small areas, England and Wales - Office for National Statistics \(ons.gov.uk\)](#)

We know that there are economic inequalities by gender and by ethnicity – pay is lower for women and for ethnic minorities, with pay being worst for ethnic minority women and ethnicity having the largest impact on pay. [Ethnicity pay gaps - Office for National Statistics \(ons.gov.uk\)](#)

Adults and children from an ethnic minority are more likely to live in poverty. For example, 43.8% of Pakistani/Bangladeshi adults live in poverty versus 17.5% White adults.

[Is Britain Fairer? \(2015\) | Equality and Human Rights Commission \(equalityhumanrights.com\)](#)

We also know that members of Black, Asian and Minority Ethnic communities have been disproportionately impacted by COVID-19, with higher mortality rates and wider economic effects since there are high concentrations of employment in low paid hospitality, retail and social care sectors.

[www.bristolonecity.com/economic-recovery-and-renewal/](#)

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.

Whilst we know inequalities exist within Bristol, which can be discerned based on geography or population groups, we do not yet have equalities data linked to the investments made. Unknowns include:

- [What the main barriers to accessing investments are and how these could be addressed](#)
- [How much of BCC investment is invested with people who are part of those sections of society that generally suffer disadvantage for example due to race, ethnicity, gender, disability and intersectionality of these characteristics.](#)
- [Who currently engages in seeking BCC investments](#)
- [What the main barriers to accessing investments are and how these could be addressed](#)

Having this data will ensure we target our investments where it is most needed.

We do collect some data on impact, as we require investee organisations we invest in for service/social impact to provide impact reports. We aim to improve this data through greater collaboration and knowledge sharing with investees, partners and other areas of investments within the council, such as our grant investments, to ensure we collect the right sort of impact data and in a consistent way.

Work is currently underway by the economic development team, to do a needs assessment which will help address some of the knowledge gaps identified here [in terms of understanding disadvantage and inequity in Bristol.](#)

More data still needs to be collected around who currently accesses our investments, what segments (geographical or population) we should target. Part of this will be done as part of work on needs assessment data, undertaken by economic development team and Black Pound workstream

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.

Workshops were held with key internal and external stakeholders to gain input on the principles and priorities to incorporate into the policy, with one area of focus being the equitable investment principles.

The stakeholders consulted included: cabinet members, local social/impact fund providers with financial expertise and local community anchor groups and representatives.

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.

Engagement with the current stakeholder group for developing the policy has now come to an end as the policy is now written. However, follow up engagement will likely continue with external stakeholders with regards to some aspects of implementation, such as the equitable principles.

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)	
No adverse impact expected as policy is about creating positive impact	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>

Potential impacts:	
Mitigations:	
Disability	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	
Mitigations:	
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input 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:	
Mitigations:	

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

Yes, as policy is designed to be inclusive to all. This may mean targeting particular groups we know are disadvantaged or typically under-represented when it comes to receiving investment, and this could be based on protected characteristics

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:

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

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

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.

We will regularly look at the balance of investment portfolio (at least annually) to see how many deliver positive social/environmental impact, with the aim of maximising those that deliver impact but still balancing this with less financially risky investments.

Where relevant e.g service investments, we will also be collecting data on impact they deliver.

We will monitor and report progress with the annual Treasury Management Report.

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:	Director Sign-Off:
Date:	Date:

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.