# **Equality Impact Assessment** [version 2.9]



Title: Budget Proposal Increase to Allotments Annual Rent	
⊠Budget Proposal GR016	□ Changing
Directorate: Management of Place	Lead Officer name: Jonathan James
Service Area: Natural and Marine Environment	Lead Officer role: Head of Service Natural &
	Marine Environment

# 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 <u>Equality and Inclusion Team</u> 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 <u>plain English</u>, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

#### **Budget context:**

Bristol City Council is required by law to set a balanced budget however we face a large potential gap in our core budget next year. With such a significant challenge the budget cannot be balanced without additional funding, making greater efficiencies (doing the same for less money) or by transforming the way we do things.

The Council has defined statutory responsibilities, but deliver against a far broader agenda, providing universal services benefiting the whole community, and targeted services aimed at individuals, communities with particular needs, and businesses – administered by our workforce, city partners, stakeholder organisations and commissioned services.

The COVID-19 pandemic has been far reaching, with a lasting impact on our people and our economy. Our finances are stretched to the limit, and the UK Government has stopped funding local COVID-19 responses. Up and down the country councils are facing this funding crisis with less money to keep services going. This is because more money is needed to: help citizens with the impact of the COVID-19 pandemic; support low-income households and local businesses in need of support post-COVID-19; support more people than ever with mental health and social care services; and meet the rising need and cost of home to school transport for children with special educational needs and disabilities (SEND) etc. At the same time, the pandemic saw us receive less income from business rates, commercial rentals, parking, sports facilities, and our museums, shops and cafes.

The <u>Medium Term Financial Plan</u> underpins the Council's financial planning process and outlines the approach we will take to meet the challenges presented by focusing primarily on delivering efficiencies, service re-design programmes which cut across directorate boundaries, and increasing external income and Invest to Save revenue.

#### This proposal:

The Bristol Allotment Service provides approx. 4,500 plots of variable sizes at sites across Bristol, the plots are available to rent by citizens of Bristol who pay rent depending on the size of the plot. The income raised from rents contribute to the general maintenance and provision of these sites, as well as contributing to the running costs of the wider Parks Service.

The last increase in rent was in September 2018, when rent was increased by £5 per plot (regardless of plot size). It is now proposed that the annual rental income for all allotment plots is increased by 25% in order to generate savings of at least £55K. Note savings would only be achieved at this level if allotment tenant rates remained as they are currently after the fee increase.

The resulting change in fee structure would be as follows:

Plot size	Current fee	Proposed fee
1 to 75m2	£30.00	£37.50
1 to 150m2	£50.00	£62.50
150 to 225m2	£70.00	£87.50
226 to 350 m2	£85.00	£106.25
351 to 450m2	£150.00	£187.50
705 to 1000m2	£305.00	£381.25

	1.2	Who will the	proposal h	ave the pot	ential to	affect?
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☐ Bristol City Council workforce	⊠ Service users	☐ The wider community
☐ Commissioned services ☐ City partners / Stakeholder organisations		keholder 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.

⊠ Yes	□ No	[please select]

# 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: <a href="https://www.bristol.gov.uk/people-communities/measuring-equalities-success">https://www.bristol.gov.uk/people-communities/measuring-equalities-success</a>.

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 <u>Data, statistics</u> and intelligence (sharepoint.com). See also: <u>Bristol Open Data (Quality of Life, Census etc.)</u>; <u>Joint Strategic Needs Assessment (JSNA)</u>; <u>Ward Statistical Profiles.</u>

Data / Evidence Source	Summary of what this tells us	
[Include a reference where known]	•	
Joint Strategic Needs Assessment (JSNA)	Working an allotment affords access to open space and encourages visits to open space, particularly during warm	
Bristol Quality of Life survey 2020/21 final report	growing months.	
	Results from the Bristol's Quality of Life (QoL) surv 2020/21 show that satisfaction the percentage of who visit green spaces once a week varies based of people's characteristics and circumstances.	people
	% who visit Bristol's parks and green spaces at least once a week	
	.Mixed Ethnicity	69.40%
	White Minority Ethnic	66.70%
	.No Religion or Faith	66.60%
	16 to 24 years	62.90%
	Female	61.50%
	White	61.30%
	,Bristol Average	60.30%
	Lesbian, Gay or Bisexual	60.20%
	Male	59.50%
	Carer	56.40%
	Single Parent	54.10%
	Other Religions	53.00%
	Black, Asian & Minority Ethnic	52.30%
	.Asian/Asian British	50.90%
	Christian Religion	50.50%
	50 years and older	47.10%
	.Full Time Carer	42.50%
	Rented (HA)	40.90%
	65 years and older	40.30%
	Disabled	35.60%
	.Black/Black British	30.10%
	Rented (Council)	27.10%
	No Qualifications	24.50%
	Working an allotment plot can bring health benefit physical activity.	ts from
	Results from Bristol's Quality of Life (QoL) survey 2 found 68.2% of people are physically active (taking 150 mins a week of moderate or 75 mins a week of	g at least
	vigorous exercise). This decreased to 55.2% for peliving in the 10% most deprived areas and varies before 45.7% in Hartcliffe and Withywood to 88.9% Bishopston and Ashley Down.	y ward

Further population breakdowns available through the Bristol Quality of Life survey 2020/21 include:

- Gender: Women (67%) are less likely to be physically active than men (70%) although this gap has decreased since last year.
- Ethnicity: Black and Asian Minority Ethnic (BAME) groups (65%) are less likely to be physically active than White Minority Ethnic (WME) groups (69%), another strand where the gap has significantly decreased
- Age: 67% of young people aged 16 to 24 years old undertake regular exercise, compared to 48% of older people aged 65+.

Working an allotment plot may also encourage **healthier eating** through the growing, harvesting and sharing of fresh fruit and vegetables at certain times of year.

Bristol's Quality of Life Survey in 2020/21 indicates 55.9% of adults in Bristol are meeting the recommended "5 or more portions of fruit and vegetables a day". This is marginally higher than the previous year (54.4%), but a significant improvement from 2015 (50.5%).

Modelled national survey estimates indicate that a higher proportion of Bristol residents are eating 5-a-day than the national average (58.9% vs 54.6%, 2018/19).

By ward, people having 5 fruit & veg a day ranges from 41.7% in Lawrence Hill ward, to 67.7% in Redland.

The association between this indicator and deprivation is not entirely consistent across the range of deprivation, but the proportion of adults eating 5-a-day tends to rise where deprivation is less acute. e.g. 46.15% in the most deprived 10% of the city, 62.4% in the least deprived 10% of the city.

Quality of Life survey responses indicate that men (48.4%), young people (45.4%) and disabled residents (49.1%), are less likely to be eating 5-a-day fruit and veg than the city average.

**Mental health** is a state of well-being in which the individual realizes their own abilities, can cope with the normal stresses of life, can work productively and fruitfully, and is able to make a contribution to their community.

Working an allotment plot can bring mental health benefits by encouraging time spent outdoors, generating social activity and generating a sense of achievement through harvesting.

If you have good mental wellbeing, you are able to:

- feel relatively good in yourself and have selfesteem; feel and express a range of emotions;
- build and maintain good relationships with others;
- feel engaged with the world around you;
- live and work productively;
- cope with the stresses of daily life; adapt and manage in time of change and uncertainty.

4.8% of Bristol residents reported a low life satisfaction score in 2018/19, higher than the national average.

Local data shows 15% have "below average mental wellbeing", rising to 20% in the most deprived areas.

Disabled people are the least satisfied with life (43%), significantly lower than the Bristol average (75%)

https://www.apse.org.uk/apse/index.cfm/mem bers-area/briefings/2020/20-79-allotmentsstate-of-the-market-survey-2020/ State of the Market Survey 2020 Local Authority Allotment Services

- Nationally there is a wide variance in the range of prices for renting allotments
- There has been a noticeable increase in demand for allotment plots as a result of COVID-19

#### **Additional comments:**

The table below shows the increases in rent for allotment plots since 2003

The table below 311	1 to		152 to	•	356 to	452 to	705 to	
Invoice date	75m2				450 m2			Column1
		£	23/	£	£	£		
2003		16.50	24.50	33.00	50.00	66.00		
		£	£	£				
2009		21.50	32.00	43.50				
		£	£	£				
2010		26.50	39.50					
	£	£	£	£	£			
2013	17.00		51.00	68.50	102.50			
	£	£	£	£	£			
2014		40.00	60.00	70.00	110.00			
	£	£	£	£	£			
2015		45.00	65.00	75.00	120.00			
	£	£	£	£	£			
2016	25.00	45.00	65.00	80.00	145.00			
	£	£	£	£	£			
2017		45.00	65.00	80.00	145.00			
2040	£	£	£	£	£			
2018		50.00	70.00	85.00	150.00			
2010	£ 30.00	£	£	£	£		£	
2019	30.00 £	50.00 £	70.00 £	85.00 £	150.00 £		305.00 £	
2020	30.00	50.00	70.00				305.00	
2020	30.00	30.00	70.00	85.00	150.00		303.00	
Proposed								

Proposed	
Increase %:	

<b>25</b> % £37.50 £62.50 £87.50 £106.25 £187.50 £381.25	25%	£37.50	£62.50	£87.50	£106.25	£187.50	£381.25
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#### Comparative charges with other Local Authorities for a standard 250m2 plot (2020)

Council Provider	Half Plot (100- 150m2)	Full Plot (200 – 250m2)
Sheffield City Council	£54 rental and £30 water = £84	£77 rental and £40 water
	(up to 200m2)	= £117 (up to 300m2)
Edinburgh City Council	£60 (100m2)	£120 ( 200m2),
Plymouth City Council	£76 (up to 179m2)	£152 (over 179m2)
Birmingham City Council	£63 (85- 167m2)	£93 (168-334m2)
Bath & NE Somerset Council	£55.14 (150m2) + £9 flat rate	£91.90 (250m2) + £9 water
	for water	
Bristol City Council	£50 (75m2 – 150m2)	£85 (225- 351m2)

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

☐ Age	☐ Disability	☐ Gender Reassignment
☐ Marriage and Civil Partnership	□ Pregnancy/Maternity	☐ Race
☐ Religion or Belief	□ Sex	☐ 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.

We do not currently collect diversity monitoring for current allotment tenants or for citizens on the allotment waiting list.

#### 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 <a href="https://www.bristol.gov.uk/people-communities/equalities-groups.">https://www.bristol.gov.uk/people-communities/equalities-groups.</a>

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 <u>Managing change or restructure</u> (<u>sharepoint.com</u>) 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.

We held a public Budget Consultation from Friday 5 November 2021 until Friday 17 December 2021. Alongside asking for views on different options for Council Tax next year, we shared some of the broad areas where we were looking at to reduce council spend to seek citizen's view. We made it clear in our communications that "We know we may need to consult with you about some of our more detailed saving proposals before we make any final decisions about them in future, and they may include difficult choices."

# 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.

All responses to the Budget Consultation will be analysed and included in a report that will be published on the Bristol City Council website in early 2022. We will take Budget consultation responses into account when developing our final proposals to put to the Cabinet and a meeting of the Full Council for approval. The final decision will be taken by Full Council at its budget setting meeting in February 2022.

The Allotment Service has a legal obligation to provide tenants with 12 months' notice period of any proposed increase in rent.

The previous rent increase was agreed by the Allotment Forum meeting in 2017 as part of a consultation process, before implementing in Sept 2018. The Allotment service will continue to consult with the Allotment Forum regarding any proposed changes to the service.

# 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)

Although we do not hold diversity information on allotment tenants or those on waiting lists (which would tell us which groups are likely to be most impacted by changes to fees on the basis of their representation) we are aware of some existing disparities which show some service users might be particularly affected by increased allotment tenancy fees. We also know that nationally the range of allotment holders has broadened in terms of age and gender in recent years.

As well as identifying whether the proposal will have a disproportionate impact on particular groups (e.g. because they are over-represented in a particular cohort of affected service users), we need to pay particular attention to the risk of indirect discrimination: when an apparently neutral decision puts members of a given group at a particular disadvantage compared with other people because of their different needs and circumstances.

Quality of Life indicators show that some protected characteristic groups are less likely to regularly access Bristol green spaces, get enough exercise, or eat fresh food etc. (see below) – there is a risk that increasing fees may place an additional barrier in the way of people benefiting from allotments in this context. The main way we can address this overall risk, as well as meeting the needs of other people living in low income households, is to continue to offer a 50% discount to tenants who are in receipt of Universal Credit, Housing Benefit or Council Tax reduction to help offset tenants who are in financial hardship, along with instalment payment plans for those who need it. We acknowledge this a partial mitigation.

Even when we plan to consult in more detail on specific service delivery proposals at a later time, we must ensure that any budget setting decisions that are likely to affect future services are informed by sufficient consultation and proper analysis. This is so that decision makers can have due regard to any likely disproportionate or negative impact for citizens, service users or employees on the basis of their protected and other relevant characteristics at the time the budget is approved – not afterwards<sup>1</sup>.

<sup>&</sup>lt;sup>1</sup> Bristol judgment clarifies Councils' Budget consultation duties — The Consultation Institute

Decision makers will have the ability to make changes to the individual spending plans following further consultation as appropriate and detailed evaluation of the impact of specific proposals. Within the proposed budget envelope there will be financial mitigation put aside for any non-delivery or amendments to proposals which may occur due to future consideration of equalities issues or other factors.

Despite previous increases in allotment rent, the demand for allotment plots continues to grow. There are currently over 6,000 citizens on the waiting lists for sites across Bristol. The Allotment Service is continuing to identify additional land and plots that can be used to help meet the demands for the service, while exploring options of reducing the size of a 'standard' plot when tenancies end by splitting in to two plots to increase capacity of existing sites.

PROTECTED CHARACTER	ISTICS
Age: Young People	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	<ul> <li>Young people are less likely to be eating 5-a-day fruit and veg</li> </ul>
Mitigations:	See general comments above
Age: Older People	Does your analysis indicate a disproportionate impact? Yes ☒ No ☐
Potential impacts:	<ul> <li>The age profile of allotment holders has broadened in recent years with fewer plot holders nationally being of retirement age, the proposal may still disproportionately impact older people in Bristol.</li> <li>Older people in Bristol are:         <ul> <li>Less likely to visit green spaces</li> <li>Less likely to be physically active</li> </ul> </li> </ul>
Mitigations:	See general comments above
Disability	Does your analysis indicate a disproportionate impact? Yes ☒ No ☐
Potential impacts:	<ul> <li>17% of Bristol's population are disabled. There are more disabled women than men living in Bristol.</li> <li>The UK Disability pay gap is 20% (2020)</li> <li>22% of disabled people aged over 16 are economically active in Bristol compared with 70% of the general population, and are more likely to work part time.</li> <li>Disabled people are less likely to visit green spaces</li> <li>Disabled people are less likely to be eating 5-a-day fruit and veg</li> </ul>
Mitigations:	See general comments above
Sex	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	, ,
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	, , , , , , , , , , , , , , , , , , , ,
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes □ No ☒
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes ☒ No ☐
Potential impacts:	<ul> <li>Asian/Asian British and Black/Black British citizens in Bristol are less likely than average to visit parks and green spaces at least once a week; and less likely to say they do enough exercise each week (Quality of Life in Bristol Survey)</li> </ul>
Mitigations:	See general comments above
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒
Potential impacts:	<ul> <li>People from faith groups are less likely to visit green spaces in Bristol at least once a week than those who have no religion or faith.</li> </ul>

Mitigations:	See general comments above			
Marriage &	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒			
civil partnership				
Potential impacts:				
Mitigations:				
OTHER RELEVANT CHARACTERISTICS				
Socio-Economic	Does your analysis indicate a disproportionate impact? Yes $oxtimes$ No $oxtimes$			
(deprivation)				
Potential impacts:	<ul> <li>An increase in rent could impact on allotment tenants who are struggling with financial hardship.</li> </ul>			
	<ul> <li>In the most deprived areas 20% of the population have below average mental wellbeing in comparison to the city average.</li> </ul>			
	<ul> <li>Less people in the least deprived 10% of the city are likely to be eating 5-a-day fruit and veg than the city average.</li> </ul>			
Mitigations:	To partially mitigate this, the following concessions are currently in place and can be continued:			
	<ul> <li>50% discount is offered to tenants who are in receipt of Universal Credit,</li> <li>Housing Benefit or Council Tax reduction.</li> </ul>			
	• 50% discount is offered to tenants who have rented plot for over 25 year.			
	<ul> <li>100% discount for volunteer site reps to oversee the site on behalf of the allotment service.</li> </ul>			
Carers	Does your analysis indicate a disproportionate impact? Yes ☐ No ☒			
Potential impacts:				
Mitigations:	See general comments above			
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g.				
Asylums and Refugees; Lo	ooked 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 <u>Public Sector Equality Duty</u> 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

We have not identified any significant benefits from the savings proposal, however a further increase in fees would enable the service to invest in resources that can promote allotments and food growing and help deliver an improved service to citizens.

### 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:

Increased to allotment fees may have a disproportionate impact on people living in low-income households, or reduce equality of opportunity for groups who already use green spaces, exercise or eat healthy food less often. To address this the Allotment service will continue to offer 50% discount to tenants who are in receipt of Universal Credit, Housing Benefit or Council Tax reduction to help off set tenants who are in financial hardship, along with instalment payment plans for those who need it. 456 allotment tenants currently receive these discounts.

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

None identifed

#### 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 reintroduce diversity data monitoring for current allotment	Lorraine Smith	Sept 2022
tenants and those on the allotment waiting lists	Allotments &	
	Smallholding	
	Manager	

### 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.

All tenants would be notified of the proposed increase in rent and given 12 months' notice of the proposed increase.

The impact of this proposal would be monitored through the annual renewal of the rental agreement with the current tenants and relevant Quality of Life Survey indicators.

# 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 <u>Equality and Inclusion Team</u> before requesting sign off from your Director<sup>2</sup>.

Equality and Inclusion Team Review:	Director Sign-Off:
Reviewed by Equality and Inclusion Team	Acting Director Management of Place
Date: 6/1/2022	Date: 06/01/2022

<sup>&</sup>lt;sup>2</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.