

Equality Impact Assessment [version 2.9]



Title: Grant determination for the Holiday Activities and Food (HAF) Programme 2022	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input checked="" 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: People	Lead Officer name: Thomas Jarvis
Service Area: Education & Skills	Lead Officer role: Education Partnership and Programme Manager

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 \(EqIA\) \(sharepoint.com\)](https://www.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.

Bristol City Council has been granted £1.8million by Central Government to provide school holiday places to children and young people entitled to free school meals for one week at Easter, four weeks in the Summer and one week in the Winter. Sessions should last for a minimum of four hours a day, offer at least one meal (preferably hot), provide physically and mentally stimulating activities, educate children about nutrition and provide signposting to support family services. To deliver this programme the Council will work with existing providers and partners in education, health and social care to scale up provision and target support to areas of the city with the highest need.
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1.2 Who will the proposal have the potential to affect?

<input 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 type="checkbox"/> City partners / Stakeholder organisations	
Additional comments: Services granted funding through the programme		

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
Census 2011 and Census 2021 2011 Census Key Statistics About Equalities Communities	According the October 2021 school census data there are 16,715 children and young people in Bristol who are entitled to free school meals. This is around 27% of the school population in Bristol. Guidance from the Government states that local authorities are asked to ensure that the offer of free holiday club provision is available for all children eligible for free school meals in the local area though it is not expected that all eligible children to participate. In total 55% of FSM children are non-white Bristol. The highest group in this non-white Bristol group are black Somali 8%. 28% of those in receipt of FSM have either SEN support or an EHCP in place. There are marginally more boys than girls and 21% have English as an additional language. Less than 2% are in, or have previously been in care.
The population of Bristol	Updated annually. The report brings together statistics on the current estimated population of Bristol, recent trends in population, future projections and looks at the key characteristics of the people living in Bristol.
New wards: data profiles Ward Profiles - Power BI tool	The Ward Profiles provide a range of data-sets, including Population, Life Expectancy, health and education disparities etc. for each of Bristol's electoral wards. School census data provides a break

	down of FSM eligibility by ward and shows that over 75% of children and young people in receipt of benefits related FSM live in 13 wards of the city.
<u>Bristol Quality of Life survey 2020/21 final report</u> <u>Quality of Life 2020-21 — Open Data Bristol</u>	<p>The Quality of Life (QoL) survey is an annual randomised sample survey of the Bristol population, mailed to 33,000 households (with online & paper options), and some additional targeting to boost numbers from low responding groups. In brief, the 2020 QoL survey indicated that inequality and deprivation continue to affect people’s experience in almost every element measured by the survey.</p> <p>The outcome from the QoL 2020/21 survey demonstrates that many wards that are dissatisfied with children and youth activities in their areas are priority wards for HAF funding due to high numbers of FSM eligibility.</p> <p>This is also the case for the number of residents that responded to say they do not do enough regular exercise or eat enough salad and vegetables as part of their diet.</p> <p>The Open Data ‘Equalities View’ tool shows at a glance the disparities for each Quality of Life indicator based on people’s characteristics and circumstances including protected characteristics, caring responsibility, tenancy, education level, and deprivation.</p>
<u>Final report on progress to address COVID-19 health inequalities - GOV.UK (www.gov.uk) December 2021</u>	<p>Multiple sources of data and evidence have highlighted the disproportionate impact of COVID-19 on equalities communities, and the impact of measures taken to address this. This final report highlights the government response to the original recommendations and the long lasting ‘take homes’. This highlights the importance of not treating ethnic minorities like a homogenous group and nurturing existing local partnerships and networks for public health programmes. It also gives recommendations around communications, developing and providing materials in multiple languages and working with community partnerships to improve understanding and co-create content for key audiences.</p>
Additional comments:	

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

<input checked="" 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.

The data for children entitled to free school meals is particularly accurate in key stages 2, 3 and 4 of education. As all children in Reception and Early Years are entitled to free school meals, there may be gaps in this data and children who are entitled to holiday school places may miss out. There are also children who come from families that are not entitled to means tested benefits and are in low-income employment. These children would not currently meet the requirements for free holiday places. Covering this cost over holidays periods is likely to increase the financial strain on low-income families.

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 existing partnership network, which includes Playful Bristol, Feeding Bristol and BAND have been working with communities and families in areas of high deprivation since 2019. This group has successfully worked with thousands of children and families in the last three years. Bristol City Council will work with this existing infrastructure and educational settings to target provision to areas of need for Easter. Working with education settings will allow us to target communications and marketing of holiday places and support to children entitled to free school meals. Many of the 100 organisations we have worked with on this project in the past 12 months work specifically with equalities group, for example WECIL, Somali Youth Voice and Imalya. The project team has worked closely with community groups in areas of high deprivation to ensure activities are tailored to the needs of those communities and builds on existing relationships and strengths.

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 project team will continue to engage with community groups in wards with the highest number of FSM children. This will be done through face-to-face/virtual workshops and focus groups with the aim of addressing gaps in provision and ensuring inclusive practices and safeguarding are embedded into the Your Holiday Hub programme. In addition to these sessions, YHH will continue to offer free training to providers to increase consistency and drive continuous improvement. Training sessions on inclusive practices and managing hate crime were delivered in 2021.

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)	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Lower take up of young people, in 2021 take up of primary age pupils was 3 times higher than those at secondary
Mitigations:	Continue to build capacity in the youth sector working with organisations engaging with secondary age students including secondary schools.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Going forward not all provision offered as part of this programme will be accessible to all children. For example, some outdoor physical activities may not be suitable for children and young people with physical impairments or those with complex learning needs.
Mitigations:	We can mitigate these impacts working with a broad range of providers to ensure there are sufficient activities across the holiday periods to provide inclusive and accessible access to all children and young people who need them. We also intend to work with providers to ensure they have the right training and understanding to support an inclusive and safe environment for all children and young people.
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Over development of sports activities has the potential to decrease participation of girls, particularly those in secondary level education
Mitigations:	Ensure a broad range of activities are funded to provide options for those who are less likely to engage in sports activities
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	

Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
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:	There is some concern that children entitled to free school meals will feel stigmatised by the free access they are provided with for holiday places.
Mitigations:	The programme aims to increase the number of open access places in areas with high numbers of FSM children, therefore reducing the need to 'prove' FSM status. Marketing for referral or bookable events will be targeted at FSM families through schools and local area newsletters
Carers	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Some children and young people with caring responsibilities may find it difficult to engage with activities
Mitigations:	Work with organisations that support young carers to ensure opportunities are made available. In addition, work with delivery partners to develop activity packs as an alternative where appropriate
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:	Some children and young people who have additional needs may not be in receipt of FSM and therefore may miss out on activities and food provision over the holidays
Mitigations:	15% of the funding can be used to support these children. We will work with organisations that work closely with these children to ensure they are included where appropriate.

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

Offering nutritious and healthy food, fun activities, and a safe space to play during the school holidays will create a significant benefit for children of low-income families, particularly those in areas of high deprivation that statistically have higher numbers of people with protected characteristics.

The programme also provides an opportunity to engage with the families of these children and young people and offer advice on and, support and access to health, employment, skills, and housing services.

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:

More work will need to be done to identify children and young people with protected characteristics who may not currently be in receipt of FSM either because they are in Early Years or Key Stage 1, or their family income currently hovers just above the threshold which leaves them vulnerable to holiday hunger. There is a risk that we will not be able to achieve our intention of ensuring that no child should go hungry during the school holidays unless we do more to promote the importance of applying for FSM in Early Years and Key Stage 1.

By focusing on the 13 highest wards for disadvantage there is a risk that vulnerable children in other areas of the city miss out on this offer. Improving the way we use data and understand the needs of families in other areas of the city will ensure we develop a model that works for the whole city.

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

Increased engagement from children, young people and their families who may have historically not engaged in holiday activities due to the high cost

Support the delivery of the Belonging and Food Equality Strategies

Increase the number of healthy activities taking place in areas with the highest need

Strengthen the youth infrastructure in priority areas – potential to increase physical and mental health and reducing anti-social behaviour in local areas

Improve transition points between primary and secondary education – potential to increase attendance and attainment.

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
Undertake a marketing and communications campaign to raise awareness of the need to apply for FSM in Early Years/Key Stage 1 - focusing efforts in areas of high deprivation - Tailored marketing to children who do not have English as a first language	Kathleen Manson	September 2022
Work with city partners to develop an operating model that goes beyond the Governments minimal expected standard of providing provision to FSM children and young people only. The main focus for this work will be on BAME communities and those with Special Educational Needs and Disabilities (SEND).	Tommy Jarvis	March 2022
Increase our understanding of the number of FSM children in remaining parts of the city ensuring activities and food are provided in a way that meet their needs.	Tommy Jarvis	July 2022

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.

Comprehensive qualitative and quantitative information will be collected throughout the delivery of this project including, but not limited to the number of children reached, areas of high and low take up and number of families that have engaged with support services. Where possible demographic data in line with BCC guidance will be captured and used in line with GDPR compliance.

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: Alison Hurley
Date: 12/01/22	Date: 12.01.21

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.