

# Equality Impact Assessment [version 2.9]



Title: Frome Catchment Innovation Programme	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input checked="" type="checkbox"/> Other [please state] Programme of projects	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Economy of Place	Lead Officer name: Matthew Sugden
Service Area: City Transport	Lead Officer role: Principal Flood Risk 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 programme aims to demonstrate how practical innovative actions can work to improve resilience to flooding. It is needed because the River Frome has been identified as a priority catchment by the Environment Agency (EA) and Bristol Avon Catchment Partnership (BACP), and hydraulic modelling indicates that the flood risk posed from the Frome in Bristol will go from being relatively manageable today, to a significant risk to people and property as we progress through the century. The objectives of the programme are to:

- Increase the resilience of communities and infrastructure at risk of flooding in the Frome catchment
- Demonstrate and quantify the benefits of natural flood management measures and retrofitting SuDS
- Support sustainable growth and regeneration throughout the Frome catchment area
- Improve local monitoring systems in central Bristol to increase flood resilience
- Engage with residents and businesses to understand flood risk and measures they can take to improve their resilience to flooding
- Engage with businesses to facilitate innovative funding mechanisms to contribute towards nature based solutions

### 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:		

### 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"/> <b>Yes</b>	<input type="checkbox"/> <b>No</b>	[please select]
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Please note that individual projects sitting within the programme are likely to require their own individual equality impact assessments at a later stage. This will be identified in project specific Full Business Cases to be developed post OBC approval.

## 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
<p><b>% who find it difficult to manage financially (Quality of Life Survey 2020/21):</b></p> <p>Bristol average: 6.8%</p> <p>Lockleaze: 10.5%</p> <p>Frome Vale: 1.9%</p> <p>Eastville: 6.4%</p> <p>Ashley: 7.9%</p> <p>Easton: 7.4%</p>	<p>The population of citizens in Lawrence Hill that find it difficult to manage financially is more than double the Bristol average. This tells us that citizens in Lawrence Hill ward may benefit more than other areas within the river Frome catchment from measures that increase those citizens' resilience to flooding. This is because people who find it difficult to manage financially are likely to be more adversely affected by flooding due to the financial impacts that recovering from flooding can have. The population of citizens in Frome Vale who find it difficult to manage financially is far lower than the Bristol average. This tells us that there may be more opportunity to help those communities to work with us to increase flood resilience using measures that they may be able to</p>

Lawrence Hill: 14.3%	contribute towards either financially or in kind.
<p><b>% whose home has been flooded during heavy downpours (Quality of Life Survey 2020/21):</b></p> <p>Bristol average: 1.6%</p> <p>Lockleaze: 0.8%</p> <p>Frome Vale: 0.5%</p> <p>Eastville: 0.0%</p> <p>Ashley: 0.7%</p> <p>Easton: 0.0%</p> <p>Lawrence Hill: 2.7%</p>	Lawrence Hill is the only ward within the river Frome catchment with a population of citizens whose home has been flooded during heavy downpours. This tells us there may be more of a need in Lawrence Hill ward in comparison to other wards in the Frome river catchment to increase resilience to flooding.
<p><b>% whose local roads have been flooded during heavy downpours (Quality of Life Survey 2020/21):</b></p> <p>Bristol average: 13.6%</p> <p>Lockleaze: 13.9%</p> <p>Frome Vale: 11.8%</p> <p>Eastville: 10.6%</p> <p>Ashley: 16.2%</p> <p>Easton: 15.3%</p> <p>Lawrence Hill: 12.6%</p>	The percentage of local roads that have been flooded during heavy downpours does not vary particularly significantly across wards in the Frome river catchment. This tells us there is a largely equal need across the area to increase the resilience of the road network to flooding.
<p><b>% whose day-to-day activities are limited (disability) (2011 Census):</b></p> <p>Bristol average: 16.7%</p> <p>Lockleaze: 19.5%</p> <p>Frome Vale: 22.3%</p> <p>Eastville: 16.5%</p> <p>Ashley: 12.5%</p> <p>Easton: 15.2%</p> <p>Lawrence Hill: 17.8%</p>	The need to design measures that do not adversely impact upon disabled people will need to be addressed at the design stage. The statistics show that this will be necessary across all wards, and may be particularly important in Frome Vale where the percentage of citizens whose day-to-day activities are limited is notably higher than the Bristol average.
<p><b>% whose main language is not English (2011 Census):</b></p> <p>Bristol average: 8.5%</p> <p>Lockleaze: 12.9%</p>	The percentage of all wards within the Frome river catchment with the exception of Frome Vale have a population of citizens whose main language is not English is higher than the Bristol average. Engagement with communities must be accessible to people who

Frome Vale: 7.9% Eastville: 14.1% Ashley: 13.8% Easton: 17.5% Lawrence Hill: 29.8%	cannot communicate or find it difficult to communicate in English. This is particularly important in the Lawrence Hill ward where the population of citizens whose main language is not English is over three times the Bristol average.
<b>Additional comments:</b>	

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

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

Although we have good data from QoL survey etc. there are gaps in citywide diversity data especially where this has not historically been required for statutory reporting. There may be some instances where we do not have enough information about the particular needs of disabled people to enable informed decision making around the detailed designs of certain measures without further engagement and consultation.

## 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.

To date the proposals have been informed by engagement undertaken by the Initial Frome Gateway community engagement and place principles work in 2019. This identified draft Place Principles which included "Opening up access to the River Frome", which influenced the inclusion of the lower Frome river restoration work stream. More recently, community engagement events held by the Frome Gateway team on the 17<sup>th</sup> and 19<sup>th</sup> February 2022 was attended by officers from the Frome Catchment Innovation Programme, and initiated conversations regarding the potential for river restoration and associated potential changes to Riverside Park.

In South Gloucestershire, land owners and farmers in areas that could be affected by natural flood management measures have been engaged through work supported by the Farming Wildlife Advisory Group and Bristol Avon

## 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.

We will continue to engage with stakeholders throughout the course of planning and delivery by the means set out in the stakeholder engagement framework. The draft engagement framework is attached. One of the objectives of the engagement framework is to reach audiences less often heard from, to gain their participation with the programme and understand their appetite for physical interventions on the river. We will seek to identify and define hard to reach communities through existing networks and champions. These community members are those that have not engaged in flooding initiatives or conversations about the topic in the past. These may include community members with low levels of literacy, low levels of English, disabled people, young people and those with caring responsibilities. We will identify specific organisations to help us consider the best approaches and understand best practise to ensure our engagement is meaningful. We will build on our existing knowledge and understanding from previous engagement work in some areas. For example we know that over 30% of children live in poverty in the Frome Gateway area, safety outdoors is a concern for several different groups and in an area where car ownership is low, access to public transport is an issue. Approaches may include getting literature translated in community languages, holding workshops at a time and location that will make it accessible for these community members, having a presence at community events and creating relevant materials that will engage different communities such as increased use of social media for young people.

## 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 significant negative impact from the proposal. However see evidence in section 2.1 above which details significant disparities in outcomes relating to flood resilience for people in Bristol on the basis of their protected characteristics and where they live, which we will aim to address through accessible and inclusive delivery of the programme.

#### PROTECTED CHARACTERISTICS

<b>Age: Young People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Changes to the built environment could have a negative impact for disabled people if they reduce accessibility or cause significant disruption during works.
Mitigations:	Designs to be informed by local engagement and project specific qualities impact

	assessments
<b>Sex</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Sexual orientation</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Pregnancy / Maternity</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Gender reassignment</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Race</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Religion or Belief</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Marriage &amp; civil partnership</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>OTHER RELEVANT CHARACTERISTICS</b>	
<b>Socio-Economic (deprivation)</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	People living in higher levels of socio-economic deprivation are likely to be less resilient and disproportionately impacted by flooding.
Mitigations:	Options appraisal to consider beneficiaries and give higher weighting to options that benefit citizens with higher levels of socio-economic deprivation
<b>Carers</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Other groups</b> [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

Improved flood resilience could have a particularly positive impact to people who have higher levels of socio-economic deprivation. These benefits can be maximised by applying a higher weighting to options that deliver benefits to citizens with a higher level of socio-economic deprivation. The proposal would therefore support our public sector equality duty to advance equality of opportunity between people who share a protected characteristic and those who don't.

## 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.

<b>Summary of significant negative impacts and how they can be mitigated or justified:</b>
Changes to the built environment could have negative impacts on accessibility for disabled people. Designs to be informed by local engagement and project specific qualities impact assessments
<b>Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:</b>
Improved flood resilience could have a particularly positive impact to people who have higher levels of socio-economic deprivation.

### 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 community level engagement and where necessary formal consultation on design options / proposals to gather necessary intelligence about specific disability needs that may need to be incorporated in to design solutions	Matthew Sugden	2022-27


### 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.

The Outline Business Case includes a monitoring and evaluation strategy that aims to monitor the benefits expected from the programme. An additional aim of the strategy will be included to monitor the impact of the interventions on people with protected characteristics.
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## 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 Director<sup>1</sup>.

<b>Equality and Inclusion Team Review:</b> <i>Reviewed by Equality and Inclusion Team</i>	<b>Director Sign-Off:</b> 
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<sup>1</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.

Date: 9/3/2022

Date: 11/03/2022