

Equality Impact Assessment [version 2.9]



Title: Proposed permanent Gypsy Traveller or Show Person's site, Western Drive, Hengrove	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service	<input checked="" type="checkbox"/> New
<input checked="" type="checkbox"/> Other [please state] <i>Change of designation</i>	<input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Private Housing and Accessible Homes	Lead Officer name: Ian Bowen
Service Area: Gypsy Roma Traveller	Lead Officer role: GRT Service Coordinator

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.

Bristol City Council's Gypsy and Traveller Accommodation Assessment (GTAA) (2020) sets out the Council's responsibility to provide housing, in the form of caravan and motorhome pitches, to Gypsy Traveller and Show Persons communities and was compiled as part of a statutory requirement under section 225 of the Housing Act 2004. The assessment is informed by a full understanding of Gypsy and Traveller accommodation needs; this was completed in Bristol between August 2019 and January 2020 through a combination of desk-based research, stakeholder interviews and engagement with members of the travelling community living on all known sites, yards and encampments.

Within the GTAA, there is a requirement, agreed by Cabinet, to increase the total number of Gypsy Traveller pitches in Bristol as follows:

Need for Gypsy Traveller pitches to rise by an additional 24 permanent pitches by 2024, increasing to a total of 32 pitches by 2036.

Need for Show Persons pitches to rise by an additional 8 permanent pitches by 2024.

This proposal is to open a new permanent Gypsy Traveller site at Western Drive in Hengrove. The site could accommodate between 6 and 8 pitches depending on design. Each pitch would contain hardstanding for living vehicles and driving vehicles, a small area of planting, grass or garden and individual (semi-detached) amenities buildings containing shower room and toilet (combined or separate), kitchen/laundry room plumbed for a washing machine, sink and electric cooker and electric hook ups.

BCC will hand over the processes of planning and applying for grant funding to a preferred housing association who will then also plan and arrange all building works. The site, once completed, will be offered to ethnic English Romany Gypsy and Irish Travellers families to apply for permanent pitches, with these applications being processed by the GRT Team and then facilitated by the housing association.

The Western Drive site would be suitable for either Gypsy Travellers or Show People.

The site is off the A4174, Hengrove Way at the southern end of the main Bristol ring road. The A4174 is a busy trunk road through the city and cuts through a main commercial and industrial area allowing rapid access onto main roads out of the city. The Ring Road leads West and South to the A37, A38 and A370 towards Weston Super Mare, Burnham and Wells or East and North into Bath & North East Somerset, South Gloucestershire and the M4 and M5 motorways. The site itself is at the Northern end of the old airport and, as far as we are aware, has never been built on.

The Western Drive site covers 3,500 square miles (0.9 acres) of bramble and brush filled uneven land, currently inaccessible to vehicles. The wider area around the site is all flat and the site itself is partly raised by tipped soil and hardcore and a formed bank (rising no higher than 1.5m) across the entrance which was most likely put in place many years ago to prevent trespass. The site is fully fenced all round with secure metal fencing and sits at the end of a quiet and little used road. The South West and North West elevations of the site face the small Western Drive industrial estate, separated by secure fencing and brush, the North East elevation runs alongside a footpath entering Hengrove & Whitchurch Park from the A4174 and the South East elevation faces a small triangular copse containing some preserved trees.

The site can be accessed from Western Drive. There is a small turning area at the front on the site that is currently blocked off by bollards.

The proposed site is in the Hengrove & Whitchurch Park Ward, which is served by 3 Councillors: Cllr Andrew Brown, Cllr Sarah Classick and Cllr Tim Kent. It is 150m *[all distances measured in a straight line]* from the nearest residential properties (in Rowberrow, Alverstock and Penrose, Hengrove) and adjacent to an industrial estate. It is 650m from both of the two nearest primary schools (School of Christ The King Catholic Primary in Filwood Ward and Perry Court E-Act Academy in Hengrove & Whitchurch Park Ward), 1200m from the nearest secondary school (Oasis Academy John Williams) and in the Southern Links Children's Centre reach area. The site is 300m from Hengrove Leisure Park, 940m from the nearest grocery and retail outlets at Imperial Park and 870m from Asda in Hengrove. The nearest GP is at Whitchurch Health Centre, 880m away, with South Bristol Community Hospital 560m to the South. The site is a short walk from bus stops on the A4174 with direct routes into the city centre.

If built as a Gypsy Traveller site, each pitch would contain hardstanding for living vehicles and driving vehicles, a small area of planting, grass or garden and individual (semi-detached) amenities building containing shower room and toilet (combined or separate), kitchen/laundry room plumbed for a washing machine, sink and electric cooker and electric hook ups.

If built as a Show Persons' site, pitches would be similarly structured but without amenities buildings as "showmens' wagons" tend to be self-contained with their own facilities. A single shared services building could be considered following discussion.

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 type="checkbox"/> Commissioned services	<input 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.

Yes **No** [please select]

Gypsy Roma Traveller (GRT) groups are heavily underrepresented in all areas across the UK and have some of the worst outcomes for any group. They have the lowest educational attainment levels of any ethnic group in the country, the worst health outcomes of any group in the UK or Europe and have a life expectancy considerably lower than all other non GRT communities. There are insufficient pitches nationally to house the 28,000 Gypsy Traveller (GT) people who live permanently in caravans, trailers and camper vans and Bristol currently only has a quarter of the pitches that it should have as recommended by Government. Having additional pitches will allow the following:

- Provide a safe base for Travelling communities from which they can access education, health and social care services and in so doing, improve health, social, educational and financial outcomes for Travelling communities.
- Provide Gypsy Traveller and Show People with an address from which they can: register for a GP surgery, health visitors, dentistry, school and other services, register for benefits and provide a base from where they can access services. It will additionally allow them an address from which they can register to vote.
- Health and safety: Provision of fresh water and waste disposal. A site that provides basic amenities as well as allowing registration with health professionals will help demonstrate that the Council is doing all that it can to meet the basic needs of and social responsibilities towards all communities.
- Provide a safe environment away from the side of the highway.
- Provide a safe location from which they cannot be subject to movement as stipulated within the Police, Crime, Sentencing and Courts Act, 2022.
- To reduce the isolation felt by Travelling communities.
- Reduction in numbers of unauthorised encampments of Gypsy Travellers across the city.
- Providing a self-supportive environment and a place where services can come to support people with mental ill health and substance misuse issues.
- Reduce safeguarding risk issues to vulnerable adults, children and young people.
- To lessen the number of complaints received from members of the public about unauthorised encampments.
- Demonstrate that BCC is committed to supporting vulnerable people.

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
BCC (May 2020) Gypsy Traveller Accommodation Assessment (GTAA), BCC.	<p>This report discusses Traveller groups that come under a definition of ethnic Travellers as well as those who come under the Planning Policy definition of “traveller” within the Planning Policy for Traveller Sites (PPTS) (2015).</p> <p>The GTAA provides information on Gypsy, Traveller & Travelling Show People Sites & Population within the city.</p>
Cromarty, H. (2019) Briefing Paper – Gypsies and Travellers. House of Commons Library, Number 08083, 9 May 2019: London	<p>This House of Commons paper provides a comprehensive study exploring the disadvantages faced by Gypsy and Traveller groups in the UK, including sections on:</p> <ol style="list-style-type: none"> 1. Who are Gypsies and Travellers? 2. Inequalities experienced by Gypsies and Travellers 3. Racial discrimination 4. Hate crime 5. Accommodation 6. Planning 7. Unauthorised encampments and developments 8. Health 9. Education 10. Employment and training 11. Benefits and tax credits 12. Criminal justice system
Communities and Local Government. (2008) Designing Gypsy and Traveller Sites: Good Practice Guide. Department for Communities and Local Government: London.	<p>This document sets out good practice guidance in designing new Gypsy Traveller site provision and will be used as the model for any future site design in Bristol.</p> <p>As the document states: <i>The Government believes that everyone should have the opportunity of a decent home. Decent homes are a key element of any thriving, sustainable community. This is true for the settled and Gypsy and Traveller communities alike.</i></p>
Quality of Life in Bristol Survey 2021-22	<p>The Quality of Life (QoL) survey provides an annual snapshot of the quality of life in Bristol using a wide range of indicators. In the last survey 65% of respondents living in Hengrove and Whitchurch Park agreed that people from different backgrounds on well together in their neighbourhood, compared to 70% average for Bristol overall.</p> <p>42.6% in the Ward felt that anti-social behaviour was a problem locally, which is broadly comparable with the city’s 38.5% average. Overall respondents in Bristol who are disabled, minority ethnic, or living in the most deprived areas of the city are more likely to find anti-social behaviour a problem.</p>
Additional comments:	

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

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

We are aware that the vast majority of Gypsy Travellers (GT) in the UK are White people who operate within a patriarchal society. We are further aware that they are the least tolerated minority group in Northern Europe with 58% of UK Travellers stating that they have been a victim of hate crime at some stage.

Travellers are known to marry and start families much younger than the general population with a larger mean number of children. More information is needed around sexual orientation; being anything other than straight/heterosexual has, in the past, not been accepted within communities and individuals report that it can be difficult to come out and be open within Traveller culture and yet still be accepted.

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 GRT Team work closely with a number of individuals, families and the limited number of representative groups that are available for Gypsy Travellers in the city – this is mainly GR8T+, facilitated by SARI and VOSCUR. The GRT Team commission SARI to provide a GRT Community Development Officer to work one day a week alongside the team. Coming from an outside, independent, voluntary organisation, this person is able to develop connection with some Gypsy Travellers who might otherwise be hard to access. We also work closely with our equivalents from neighbouring Authorities and across the UK.

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.

As a team, the GRT Team will continue to engage with as many Gypsy Travellers as possible. Working alongside our partners in the police and Health, we continue to foster new relationships with new groups as well as reaching out personally to individuals wherever possible.

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 impacts from the proposal. However we are aware of significant existing disparities for Gypsy Travellers which we will aim to mitigate where possible.	
There is 62% illiteracy amongst GT adults. Health across children and adults is generally poor, with a shorter life expectancy, even after adjusting for socio-economic status, with a life expectancy of 10 to 20 years lower than the general population. There are high levels of imprisonment – less than 1% of the UK population are GT and yet they represent 5% of the prison population. Deaths from respiratory diseases, cardiovascular diseases and suicides are more markedly increased in GTs compared to the general population. Levels of Domestic Abuse within the Traveller communities are nearly twice as high as in non-traveller (62% as opposed to 33%).	
We are also aware that the setting up of any new site may be resisted from the local non Gypsy Traveller population. In some instances, this is due to anti-Gypsyism, but there is also a fear of the unknown and a fear that sites could lead to an increase in unauthorised encampments in the local area.	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Gypsy Traveller families have a higher mean average number of children to non-travellers (4.3 compared to 2.6). GT children are amongst the lowest performing groups in terms of achievement and engagement at school. 55% of GT pupils are eligible for free school meals (compared with 26% of children generally within Bristol), are twice more likely than any other groups to be excluded from primary school and four times more likely to be excluded in secondary school.
Mitigations:	The establishment of a new site would lead to a more positive impact on the safety of children and young people. See above re. proximity to local primary and secondary schools.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Accommodation is a crucial issue for older Gypsy Travellers, and difficulties in this area have a great impact upon health and wellbeing ¹ .
Mitigations:	A permanent base will allow better and more consistent access to local services and carers support opportunities
Disability	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Despite the constraints of living in a caravan, there are many Travellers with physical disabilities who live in trailers.
Mitigations:	Having a site on flat, level ground with access to facilities and the security of not having to constantly move would provide an environment that enables them to live comfortably as opposed to unauthorised encampments that lack security and may be subject to constant movement and pressures from local residents, vehicle traffic and passing foot traffic.
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

¹ [working_with_older_gypsies_and_travellers.pdf \(nationalgypsytravellerfederation.org\)](#)

Potential impacts:	
Mitigations:	Generally speaking, we have found a relatively even number of male and female Gypsy Travellers accessing the city.
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Gypsy Travellers who have come out as anything other than straight/heterosexual have often stated that they feel outcast and isolated from their familial groups as a result. If they came out while living on a permanent site, they may not feel able to safely remain in that location.
Mitigations:	Whilst outside the scope of this specific proposal, we commission SARI to provide a GRT Community Development Officer, and where we are aware any harassment is specifically on the grounds of disability, sex, race or ethnicity, religion or belief, sexual orientation, gender identity or gender expression, then this will be reported and recorded as appropriate. We will always take the impact of hate motivated abuse seriously and signpost victims to Bristol Hate Crime and Discrimination Services for support. https://www.bhcds.org.uk/report
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Gypsy Travellers are known to generally marry and start families younger than in non-travelling communities, often while they are travelling
Mitigations:	Being able to live on a permanent site will allow expectant women and mothers of younger children a safe place from which to access consistent services such as midwives, GPs and health visitors.
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	As Sexual Orientation above Trans people may be outcast and isolated in GT communities.
Mitigations:	As Sexual Orientation above
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	As above – there is a risk that setting up of any new site may be resisted from the local non Gypsy Traveller population due to anti-Gypsyism, prejudice and lack of understanding.
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:	Gypsy Travellers are amongst the poorest ethnic groups within the UK with some of the worst employment opportunities.
Mitigations:	Having a permanent site will allow a fixed address which in turn makes applying for work and/or benefits easier.
Carers	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Gypsy Travellers have higher numbers of carers for dependent relative(s) with chronic illness or disability than non-travellers (16% compared to 8%)
Mitigations:	A permanent base will allow better and more consistent access to local services and carers support opportunities
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

The proposal will aim to advance equality of opportunity for GT people who are protected in the Equality Act 2010 under the characteristic of Race².

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:

There is the potential that a new permanent gypsy traveller site might be met with objection from within the pre-existing local community. In all instances we liaise closely with local elected members, Community Development and the Police over this, as well as liaising with SARI (the GRT Team commission SARI to provide a GRT Community Development Officer to work one day a week alongside the team).

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

The presence of the site can bring a new use to an abandoned area of land, bring a different diversity into the area and can hopefully develop and new and strengthened community in the area that incorporates the new site.

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?

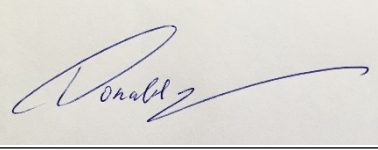
How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

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

² English and Welsh Romany Gypsies and Scottish Travellers were recognised as a distinct ethnic group within the Race Relations Act 1976 following the case of Commission for Racial Equality v Dutton [1989]. Irish Travellers were established as an ethnic group within The Race Relations (Amendment) Act 2000. This legislation has now been replaced by the Equality Act 2010.

impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director³.

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off: Director Housing and Landlord Services 
Date: 13/5/2022	Date: 11/01/2023

³ 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.