

# Equality Impact Assessment [version 2.9]



Title: R14 Marketing, Communications, Design, Web and Consultation	
<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 checked="" type="checkbox"/> Changing
Directorate: Resources	Lead Officer name: Tim Borrett
Service Area: Policy, Strategy and Communications, comprising: <ul style="list-style-type: none"> <li>• External Communications and Consultation             <ul style="list-style-type: none"> <li>○ External Communications</li> <li>○ Consultation and Engagement</li> <li>○ Bristol Design</li> <li>○ Web Team</li> </ul> </li> <li>• Policy and Public Affairs</li> </ul>	Lead Officer role: Director – Policy, Strategy and Digital

## 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.

## **Budget context**

Every year, the council must agree an annual budget which balances the money we spend with the money we are expecting to receive. Councils across the country are facing financial challenges and based on our current forecasts, we face a funding gap over the next five years (to 2027/28) of up to £87.6 million dependent on the severity of factors such as rising costs of fuel, energy and inflation. This is in addition to the £34.3 million of savings and efficiencies proposals for 2022-2027 outlined in the 2022/23 budget.

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.

To address these challenges we must look again across all of our services to find where we can do things differently to reduce costs, be more efficient in how we do things and, in some cases, stop doing some things entirely.

## **This proposal**

This is a service-wide restructure with the main aim of creating a new Department (Policy, Strategy and Communications) by combining two existing departments – External Communications and Consultation; Policy and Public Affairs. This will include reducing staffing costs as part of overall council-wide efforts to save money due to a projected overall council budget gap of between £37.5m - £87.6m over five years. There is an over-riding and urgent need to make savings in order to ensure that the council remains financially sustainable.

Whilst a figure of £130,000 saving has been published as part of proposals for balancing the council's 2023/24 budget as saving proposal 'R14 Marketing, Communications, Design, Web and Consultation', the actual target for the service is higher because it needs to deliver its share of savings previously committed to by the council in its 'Common Activities Programme' and 'Management and Capacity Review', and also contain pay inflation on behalf of some other small service-areas within the Policy, Strategy and Digital division.

Aside from the urgent business need to become financially sustainable, the specific details of the proposed future structure and functions of the service also seek to address business needs arising from:

- A restructure of the Policy, Strategy and Digital division's third tier management structure as part of the council's Management and Capacity Review,
- The changing shape of the council's policy resourcing following the Common Activities Programme,
- Responding to planning and prioritisation deficits in the services, resulting in a regular outstripping of demand versus capacity and very little outcomes-based evaluation of communications activity,
- Historic over-use of fixed-term and other temporary staffing solutions following a demand-led approach,
- The need to deliver previous/existing savings targets related to Common Activities and the Management and Capacity Review.

To meet these needs and a total savings target of circa £315k, a service wide restructure will be required and this would see a reduction in Full Time Equivalent roles. The detail of this is being prepared for staff and Trade Union consultation, and this EQIA will be updated with this detail as soon as it is ready and shared with affected staff – this will be in time for Full Council's setting of the annual budget.

In terms of rationale for the proposed structure, role deletions and changes, these are necessary to ensure savings are achieved whilst enabling some targeted reinvestment in planning and prioritisation skills.

The new structure is proposed to span three teams:

The restructure can be expected to reduce some elements of the service offered by External Communications, which includes marketing, PR, web and consultation services.

## **1.2 Who will the proposal have the potential to affect?**

<input checked="" 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 checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments: The proposals directly affect the council's staff working across the External Communications and Consultation and Policy and Public Affairs services, and may indirectly affect other colleagues in terms of there being a reduced service offer from the service in future. They may affect the public and stakeholders in terms of a reduced volume of communications produced by the council in future.		

### 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
HR Diversity Dashboard	<p>The HR Diversity Dashboard provides an overview of divisional staff across a range of protected characteristics; however, it does not provide specific detail about specific teams within the affected cohort.</p> <p>At a divisional level:</p> <ul style="list-style-type: none"> <li>• Young employees are under-represented and older employees (from 40+) are over-represented</li> <li>• Black/Black British; Asian/Asian British: and other minoritised ethnic</li> </ul>

employees are slightly under-represented, and there is significant under-representation of these groups within External Communications and Consultation.

- Women are significantly over-represented within External Communications and Consultation.
- Christian: 19% compared to Bristol working age population 43.5%

**External Communications and Consultation**

	% EC&C	% Bristol City Council	% Bristol Economically Active Citizens
Age 16-29	17.0	12.3	39.0
Age 30-39	34.0	21.0	24.0
Age 40-49	28.3	23.7	16.0
Age 50-64	20.8	39.6	21.0
Age 65+	0.0	3.4	-
Disabled	11.3	9.1	12.0
Asian/Asian British	0.0	2.8	5.8
Black/Black British	0.0	5.1	5.3
Mixed ethnicity	0.0	3.6	2.9
Other ethnic groups	0.0	0.4	1.0
White	92.5	79.8	85
Female	60.4	60.3	49
Male	39.6	39.2	51
Civil Partnership	0.0	0.2	-
Married	11.3	12.7	-
Christian	15.1	26.6	43.5
Other religion/belief	11.3	6.5	7.3
No religion/belief	56.6	40.7	41.5
LGB	5.7	5.8	9.1
Trans	0.0	0.1	-

Primary knowledge (direct interaction)

Some sensitive diversity information disclosed by employees on confidential HR records is only reportable at service area level and is redacted in filtered reporting for data protection purposes.

Employees may well hold protected characteristics which are not visible or disclosed.

**Additional comments:** Higher % of unknown or not disclosed data in relation to Marital Status (average 60% undisclosed), Trans (approx. 58% undisclosed).

Due to the small size of the team, detailed statistical breakdown is not available for Policy and Public Affairs, though it is known that in this team gender balance is broadly equal and older age-groups (40+) are under-represented.

**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.

There is a gap relating to circa 5.6FTE employees due to transfer to the Policy function from other teams. Several of these posts are likely to be vacant.

There are also gaps in knowledge relating to Pregnancy/Maternity and some gaps in relation to disclosed data relating to Marital Status and Trans.

Data is only available at a broad service level, so impacts within particular teams will need to be considered by managers using primary knowledge.

### 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 council's Managing Change Policy is being followed, and this workforce is aware of the intention to restructure.

The dates for consultation have been shared by email.

Trade Unions have been notified of the intention to restructure and consult colleagues.

### 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.

Staff will be briefed during the launch of proposals and will have 121 meetings with managers to provide feedback and clarify anything during the consultation period.

There will be ongoing communication and engagement via individual meetings (both formal 121s and ad-hoc) and collectively at management team meetings.

Trade Union representatives will be sent the proposals, business case and EQIA at the launch of the consultation, with further discussion offered and job paperwork, job evaluation questionnaires to follow. Regular weekly meetings are in place with Trade Unions at a council-wide level and we can attend when required to discuss this proposal.

## 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

We have not identified any significant negative equality impacts from the proposal at this stage, which is prior to staff consultation and confirmation of Methods of Appointment. However, we are aware of existing issues and disparities for Council employees on the basis of their protected and other relevant characteristics which we will aim to mitigate and address where possible through our management of change approach.

Aside from specific impacts by protected characteristic, the whole workgroup may be affected by anxiety or stress resulting from change management; particularly those who may be at risk of redeployment or redundancy, and those ringfenced competitively and/or potentially taking on larger remits. This risk is relatively low within this cohort, as there are a large number of vacancies which reduces the risk of redundancy in many instances.

For any new or revised roles we will review job paperwork including job descriptions and employee specification to make sure: it is asking only for the skills, experiences and qualities needed to do the job; there is a requirement to implement equality and respect diversity, with all applicants being assessed against this; there are no discriminatory statements or requirements; and that language is not biased<sup>1</sup>.

If competitive interview is required as part of any future restructure after consultation – we will ensure there is a diverse recruitment panel and request Diverse Recruiters; consider the additional needs of any staff who have been on any extended leave so they are not to indirectly disadvantaged (see below); routinely shortlist and interview all disabled applicants who meet the essential criteria; ensure tests, assessments and interview processes are accessible and ask in advance whether candidates require any reasonable adjustments (even if they have not disclosed they are a disabled person).

For any potential changes to work locations or patterns we will consider the impact of on those who may be more reliant on car parking, public transport, have caring responsibilities or other duties etc.; provide and support access to funding for workplace adaptations and aids to enable disabled people to obtain and retain their employment; Promote flexible working patterns wherever possible to maximise opportunities for people with caring responsibilities and those from faith groups.

#### PROTECTED CHARACTERISTICS

<b>Age: Young People</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	There is already significant under-representation in the 16-29 age category and so reductions in posts may be more likely to compound this further.
Mitigations:	<ul style="list-style-type: none"> <li>• Introduction of more entry-level and developmental roles are proposed</li> <li>• Targeted recruitment activity for vacancies</li> <li>• Exploration of partnerships to on-board younger colleagues, such as with colleges and universities</li> </ul>
<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	/

<sup>1</sup> For example by using [Gender Decoder: find subtle bias in job ads \(katmatfield.com\)](#)

Mitigations:	/
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>Statistically, Disabled people are less likely to be employed in a managerial or professional occupation, and Disabled people are more likely to work part time.</li> <li>There is a broadly representative % of Disabled people within the service compared to the economically active population, and there may be colleagues requiring reasonable adjustments to consultation or selection processes.</li> </ul>
Mitigations:	<ul style="list-style-type: none"> <li>Offer additional time or alternative phasing of consultation if required</li> <li>Consider reasonable adjustment requirements relating to accessing the consultation and selection processes</li> <li>Access to Employee Assistance Programme 24/7</li> </ul>
<b>Sex</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	<ul style="list-style-type: none"> <li>Women are over-represented within ECCO and so may be statistically more likely to face potentially stressful competitive selection processes than male colleagues.</li> <li>However, as men are under-represented, any role reductions impacting male staff may compound this under-representation further and at a statistically disproportionate rate.</li> </ul>
Mitigations:	<ul style="list-style-type: none"> <li>Targeted recruitment advertising for any vacant posts.</li> </ul>
<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 checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Christians are significantly under-represented and so any role reductions impacting Christian staff may compound this further and at a statistically disproportionate rate.
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 type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	/
Mitigations:	/
<b>Carers</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Being a carer can be a major barrier to maintaining employment and changes to workplace arrangements and working hours/flexibility can have a disproportionate impact on carers (who are also more likely to be women).
Mitigations:	Consider individual impact of proposals as part of 121 interviews / staff consultation.
<b>Other groups:</b> N/A	

### 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

There are likely to be a small number of new or vacant roles affording the opportunity to target recruitment to under-represented groups, including internally from the council's talent development programmes for under-represented groups.

## 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:**

Risk of compounding existing under-representation, particularly amongst men, younger employees and those of Christian faith; to be mitigated where possible via targeted recruitment activities and exploration of new on-boarding pipelines for younger talent.

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

Opportunity to use any recruitment activities to attract a more representative workforce.

### 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
Review EQIA to take account of draft Structure, Methods of Appointment and specific impacts on teams / characteristics that may arise from these.	Director: Policy, Strategy and Digital	January - February 2023
Consult staff including 121s	Interim Head of External Communications and Consultation  Head of Equality and Inclusion (pp Head of Policy and Public Affairs)	January 2023
Consult Trade Unions on proposals	Director: Policy, Strategy and Digital	January 2023
Consider appropriate targeting of any arising recruitment opportunity to under-represented groups.	Interim Head of External Communications and	February 2023



Improvement / action required	Responsible Officer	Timescale
	Consultation  Head of Equality and Inclusion (pp Head of Policy and Public Affairs)	
Update equality impact assessment with any emerging issues identified as part of management of change consultation	Gavin Arbuckle	February 2023 and ongoing

### 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.

- Process completed in line with Managing Change Policy.
- Follow-up 121 meetings with staff to evaluate and seek lessons learned.
- Achievement of financial savings.
- Successful recruitment to any new or changed roles.
- Review of HR Diversity Dashboard data and updating of Workforce Plan and Equality Action Plan ahead of conclusion of the council's 2023/24 Service Planning exercise.

## 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>2</sup>.

<b>Equality and Inclusion Team Review:</b> <i>Reviewed by Equality and Inclusion Team</i>	<b>Director Sign-Off:</b> Tim Borrett, Director: Policy, Strategy and Digital
Date: 4/1/2023	Date: 4/1/2023

<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.