

# Equality Impact Assessment [version 2.12]



Title: Markets Service Income Generation	
<input type="checkbox"/> Policy <input type="checkbox"/> Strategy <input checked="" type="checkbox"/> Function <input checked="" type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Economy of Place	Lead Officer name: Jason Thorne
Service Area: Economic Development – City Centre & High Streets	Lead Officer role: Service Manager – City Centre & High Streets

## 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://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.

It is proposed that Market fees will increase by 5% from April 2024 as per 2023/24, so in line with normal practice. This doesn't require engagement and consultation.

The delivery of additional Markets income beyond the 5% in 2024/25 is subject to a more detailed review of market fees and licenses, including at St Nicholas Market (indoor and outdoor), charges made to market operators under the Markets Charter, use of outdoor space for further markets/events and promotional opportunities.

The review will consider the financial sustainability of St Nicholas Market, ensuring that operational costs are covered and plan for future investment in improvements, which may include better accessibility and ensure the offer serves our more deprived areas. We need to ensure that the markets offer reflects and serves Bristol's diverse communities.

The review will need to recognise the economic benefit of markets and the wider social/community benefits they bring to the city centre and high streets. In terms of St Nicholas Market the benefits are:

- It provides a home to 60 permanent small independent businesses, directly employing over 130 people and supporting businesses and jobs amongst the supply chain.
- It provides a source of trade for up to 50 outdoor traders each week.
- High value as a visitor/tourism destination - the total number of visitors to St Nicholas for the last 52 weeks was 3,600,308, 19.6% up on the previous year. The total number of visitors for the year to date was 2,933,268, 16.7% up on 2022.
- Business rates income from the small businesses.

Engagement and consultation are planned to begin in January 2024 on Market Licences and Markets Charter with market traders, operators and other stakeholders. It will be carried out in line with Markets law and consider

guidance from the National Association of British Market Authorities. A separate EqIA will be carried out for any other issues arising from the review.

## 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 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"/> 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: [How we measure equality and diversity \(bristol.gov.uk\)](https://www.bristol.gov.uk/equality)

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 \(sharepoint.com\)](https://www.bristol.gov.uk/data-statistics). 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](#)

Data / Evidence Source [Include a reference where known]	Summary of what this tells us
Survey of St Nicholas Market indoor traders compared to Bristol CC Equalities Statistics (Population by Ethnic group – ONS Census 2021)	A survey of indoor market traders was carried out between Sept and Nov 2022 received 48 responses, showed the below in terms of equalities. It should be noted that traders could select all those that apply, so some will fall into more than one category. 28 traders (58.3%) responded that they didn't belong to any of the equality groups.

	Group	Number	St Nicks Percentage	Bristol Percentage
	Black & minority ethnic-led (led or controlled by a majority of people who are from a black or minority ethnic background)	10	20.8%	18.9%
	Female-led (led or controlled by a majority of people who are female)	8	16.7%	41.6% (excl. ages 0-15)
	Young people-led (led or controlled by a majority of people who are aged 30 or under)	3	6.2%	15.1%
	LGBT-led (led or controlled by a majority of people who are lesbian, gay, bisexual, or transgender)	1	2.1%	6.07%
	Disabled people-led (led or controlled by a majority of people who are disabled)	1	2.1%	8.4%
Population change: <a href="#">Census 2021</a>	The population of Bristol at the 2021 census was 472,434, an increase of more than 44,000 since 2011 (10.3% against an increase in England and Wales of 6.3%) Bristol was the fastest growing of all the Core Cities in England and Wales over the last decade.			
Ethnic Disparity: 1. <a href="#">Census 2021</a>	1. Bristol's population is increasingly diverse. In 1991 the Black, Asian & Minority ethnic			

<ol style="list-style-type: none"> <li>2. <a href="#">Bristol: a city divided? (Centre on the Dynamics of Ethnicity, 2017)</a></li> <li>3. <a href="#">Impact of the Cost-of-Living Crisis on Black &amp; Minoritised Communities in Bristol (Black South West Network, 2023)</a></li> </ol>	<p>population accounted for 5.1% of the total population; in 2001 this increased to 8.2%, in 2011 to 16% and in 2021 to 18.9%. The largest minority ethnic groups in 2021 were Somali (1.9%), Pakistani (1.9%) and Indian (1.8%)</p> <ol style="list-style-type: none"> <li>2. Bristol ranked 7th out of the 348 districts of England &amp; Wales (1=worst) on the Index of Multiple Inequality.</li> <li>3. 75% of respondents to Black South West Network’s survey believe they are struggling to afford basic items (defined as groceries, foodstuffs, cleaning supplies, and basic hygiene products); 79% of respondents stated they are currently struggling with paying their bills; 55% of respondents made explicit reference to the unaffordability of food and a further 43% of respondents struggling to pay for three or more of their utility bills.</li> </ol>
<p><a href="#">Ward Profile Data</a> (Data for Central ward listed in relation to the city centre)</p>	<p>Central (City Centre): 2nd ranked ward by child poverty (39.8% against Bristol average of 21.8%); 4th ranked by children known to social care (31.9 per 1,000 against Bristol average of 22.0 per 1,000); 2nd ranked by country of birth (37.6% against Bristol average of 18.8%); 1st ranked by crime: burglary (16 per 1,000 against Bristol average of 5.3 per 1,000).</p>
<p><a href="#">Quality of Life Indicators</a> (Data for Central ward listed in relation to the city centre)</p>	<p><b>Central:</b> 25 Quality of Life indicators ranked significantly worse against the respective Bristol average, including in the Community/Living, Crime/Safety, Culture/Leisure, Sustainability/Environment, Transport, Health/Wellbeing and Housing categories.</p>
<p><a href="#">Bristol Key Facts (2022)</a></p>	<ul style="list-style-type: none"> <li>-In the year April 2021 to March 2022 there were 7.6 small business start-ups per 10,000 working age population in Bristol. 183 small businesses started in March 2022, 22.1% lower than the pre-pandemic level of 235 in March 2020</li> <li>-The population of Bristol has become increasingly diverse and some local communities have changed significantly. There are at least 45 religions, 187 countries of birth and 91 main languages spoken.</li> <li>-In Bristol 15% of residents live in the 10% most deprived areas in England, including 19,000 children and 7,800 older people.</li> <li>-Life expectancy for women is 82.7 years and for men 78.5 years (2018-2020) both are lower than the national average. The inequalities gap in life expectancy between the most and least deprived areas in Bristol is 9.9 years for men and 6.9 years for women. Bristol’s healthy life expectancy (years living in good health) is 61.5 years for women and 59.8 years for men (2018-20; significantly lower than the national average of 63.9 and 63.1 years respectively).</li> <li>-In March 22 4% of the city’s working age population were claiming out of work benefits; 15% of these were</li> </ul>

	<p>young people aged 16-24 years, while 19% were aged 50 years and over.</p> <p>including 3 of the 5 lowest performing neighbourhoods in England.</p> <p>-Only 52% of residents are satisfied with the range and quality of outdoor events in the city (from 74% pre-pandemic).</p>
<b>Additional comments:</b>	

**2.2 Do you currently monitor relevant activity by the following protected characteristics? No, not collected**

<input 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.

We have some equalities data on current market traders within indoor spaces at St Nicholas, but not for outdoor traders. We don't have any information for operators and those who visit/don't visit St Nicholas Market and other markets across the city.

**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.

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 a change process 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.

Full engagement and consultation are planned to begin in January 2024 through online and paper surveys with traders at St Nicholas Market and with those currently holding a Market Charter license. We will also consult with organisations who support current and prospective market traders, operators and residents e.g. National Market Traders' Federation, Federation of Small Businesses, Visit West, Bristol Food Network, Business West, Black South West Network, YTKO, Business Improvement Districts, Traders' Associations, Shopping Centre Managers, Ashley Community Housing (known as ACH), Babbasa, West of England Centre for Inclusive Living (WECIL), community and faith groups.

We have regular meetings with the Bristol branch of the National Market Traders' Federation. We will be supported with the review by the National Association of British Market Authorities.

Consultation will be accessible to all as it will be via multiple channels i.e. both online and physical paper copies. For example, those with English as a second/additional language, translated paper copies will be available upon request (for those who request these formats, consultation timescales will take into account of the production

and circulation of these formats). Large print and braille surveys can also be prepared and circulated if and when required.

If any gaps or groups are identified during the consultation and engagement who are under-represented, targeted engagement will be made with those groups, however at this stage none have been identified and groups are considered to be sufficiently covered by the main consultation.

The equalities characteristics of those consulted with will be monitored during the engagement and consultation.

## 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.

Following consultation, respondents will be continued to be kept informed via email and face-to-face interactions. Targeted work of under-represented groups will not be undertaken due to the nature of this consultations insofar as it relates specifically to the Markets Licence and Markets Charter and will be covered sufficiently by the main consultation.

## 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 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)

Engagement and consultation to review the current Markets Licence and Markets Charter are planned to begin January 2024.

Any increase in market trader and operator fees has the potential to impact all groups. Impacts include viability on and closure of small businesses, which could in turn lead to less income (license fees and business rates) if the increase in fees leads there to being less occupancy at St Nicholas Market and within the wider Old City and City Centre economy.

The financial sustainability of St Nicholas Market and the service is crucial to current and future traders, and other market operators. The existence of St Nicholas Market allows diverse businesses owned by people from a range protected characteristic groups to operate / make an income - changes to fees those businesses are charged could therefore affect those businesses.

#### PROTECTED CHARACTERISTICS

<b>Age: Young People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
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Potential impacts:	
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Mitigations:	
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<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
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Potential impacts:	
Mitigations:	
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Communications need to be provided in alternative formats where required.
Mitigations:	
<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:	May disproportionately impact those from lower socio-economic households/groups
Mitigations:	Consideration of needs throughout the engagement and consultation. These groups are potentially eligible for other in work benefits and tax benefits. We will connect these people to Bristol Business & Enterprise Support.
<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 any other relevant groups as appropriate e.g. asylum seekers and refugees; care experienced; homelessness; armed forces personnel and veterans]	
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

## 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:

The raising of fees does have the potential to negatively impact. The potential raising of fees is justified by the fact that apart from inflationary increases (which were paused between 2021 and 2022), there has not been a fee review or increase in over 10 years. The EqIA has informed this proposal by considering the needs of all, including Disabled people and those to which English is a second/additional language and how this impacts a consultation.

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

Positive impacts include the fact that all market traders will have the opportunity to comment on the planned consultation in order to feedback on proposals. Key organisations will also be consulted with who support current and prospective market traders, operators and residents which represent the broad spectrum of Markets users including those of under-represented groups.

### 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
Consultation surveys available both online and on paper to include section highlighting to those to which English is a second/additional language that translated copies can be provided if required.	Jason Thorne/Jamie Burman	January 2024
Consultation surveys available both in large print and braille copies can be provided if required.	Jason Thorne/Jamie Burman	January 2024
Collect equalities data those responding to consultation	Jason Thorne/Jamie Burman	January 2024

### 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.


Increased Markets service income by at least 10% during 2024/25  
 Increase in occupancy and jobs at St Nicholas Market – indoor and outdoors  
 Increase in licensed markets across the city

## 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> 
Date: 24/11/2023	Date: 27.11.2023

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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.