

# Equality Impact Assessment [version 2.10]



Title: Professional Services & Consultancy Contract Rebate	
<input checked="" type="checkbox"/> Budget Proposal	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Resources	Lead Officer name: Niotia Ferguson
Service Area: Procurement & Contract Management	Lead Officer role: Head of Procurement & Contract Management

## 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 continuing to face financial challenges and based on our current forecasts, we face a funding gap over the next five years (to 2028/29) of up to £81.2 million dependent on the severity of factors such as inflation, funding changes, and unavoidable service pressures. This is in addition to the £17.7 million of savings and efficiencies proposals for 2024-2028 outlined in the 2023/24 budget and assumed delivery of 2023/24 savings in the current year.

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 are looking across all of our services with a focus on:

- maximising our transformation programmes – where we are looking to improve services whilst achieving the best value for money
- income opportunities – where we are looking to improve our external income and most effectively apply that income
- targeted reviews – where we are looking at services that are comparatively high in cost compared to other councils to see 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

Bristol City Council (BCC) requires compliantly procured contract to deliver Professional Services requirements across the authority.

### Professional services

Professional services are provided by an individual or business to help us achieve a goal or run a project. They're provided by people who have specific knowledge and skills in that area of work to fulfil the responsibilities of particular roles. Individuals will be expected to show certification, registration or a license if they're providing a certain type of service.

### Consultancy

Consultants:

- conduct research and collate data to identify issues with an organisation's process
- present their findings to the client
- provide recommendations and implement the changes
- prepare business proposals, manage projects and lead team members

The procured contract has been awarded to Constellia for 2 years expiring in April 2025. One of the terms of the contract award was a cashable benefit to BCC.

As part of their proposal Constellia offered a financial rebate payable to BCC on award of any contract they secure. The rate agreed is 2% of the awarded contract value.

Currently the Council spend is approx. £12 million a year of professional services. This work is often awarded in an inconsistent way without approaching the market to compete their requirements which does not evidence value for money or compliance with Procurement rules/regulations.

Contracts are currently awarded to the same repeated suppliers, reducing the opportunity for other suppliers to quote specifically local, diverse and MSME's (Micro, Small Medium Enterprises) to be awarded contracts. Often contracts are awarded without including Key Performance Indicators or proper Contract Management arrangements which is largely due to time and resource constraints.

The awarded contract will result in:

- Compliantly awarded contract via the SEWTAPS (South East Wales Technical and Professional Services ) Framework
- Dedicated resource (extension of Procurement Team)
- No cost to Bristol City Council
- Compliance with BCC procurement rules and procurement regulations
- Increase and focus on awarding to Local and Diverse suppliers, specifically MSME, Voluntary and Social Enterprise
- Online platform to monitor contract delivery and social value

The awarded contract will ensure our spend is compliant but also that there is evidence of value for money and that the spend aligns to all Corporate priorities.

## 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 checked="" type="checkbox"/> Commissioned services	<input type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

## 1.3 Will the proposal have an equality impact?

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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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.

## 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-diversity)

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.sharepoint.com/Data-Statistics-and-Intelligence). 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 \(sharepoint.com\)](https://www.sharepoint.com/HR-Analytics-Power-BI-Reports) 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
<a href="#">Census 2021</a>	The Census details the demographic profile of Bristol.
<a href="#">The population of Bristol</a>  <a href="#">Bristol Key Facts 2022</a>	Updated annually. The report brings together statistics on the current estimated population of Bristol, recent trends in population, future projections and looks at the key characteristics of the people living in Bristol.  Population Profiles for Equalities Groups bring together detailed analysis looking at equalities groups and how they differ in relation to age, health, employment, education and housing, and maps the distribution of equalities groups across the city.

<p><u>An evaluation of the Bristol Race Equality Covid-19 Steering Group</u></p> <p><u>Designing a new social reality - Research on the impact of covid-19 on Bristol's VCSE sector and what the future should be – Black South West Network 2020</u></p> <p><u>Delivering an inclusive economy post COVID-19</u></p>	<p>Report focusing on how co-production using a One City approach has been used to respond to the disproportionate impact of the Covid-19 pandemic on our marginalized ethnic communities.</p> <p>Local research has highlighted how long-term underinvestment and lack of equity in funding and procurement has eroded the local Voluntary and community sector.</p> <p>Our local partners have conducted research into the ongoing impact of COVID-19 for women and have provided recommendations on what service providers can do to reduce impact further impact.</p>
<p>SPARNET - Percentage of procurement spend with 'Micro, Small and Medium sized Enterprises' (MSME's)</p>	<p>This measures the percentage of Bristol City Council's overall procurement expenditure committed to Micro, small and medium sized enterprises. (MSMEs). The aim is to support BCCs policy to ensure that SMEs have the opportunity to bid for and win council contracts. BCC's annual target is 40% currently we are reporting as 51.9% which is significantly higher than target.</p>

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

<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.

Although our corporate approach is to collect diversity monitoring for all relevant characteristics, there are gaps in the available local diversity data for some characteristics, especially where this has not always historically been included in census and statutory reporting e.g. for sexual orientation.

We also know there are some under-reporting gaps in our workforce diversity information - where personal and confidential information is voluntarily requested from staff.

We do not currently record:

- If a supplier is a diverse supplier
- How many Diverse suppliers we contract with

*The questions we will be asking bidders are (for information only):*

*Would you define your company/organisation/charity etc as a diverse supplier?*

Definition – (please tick which definition applies to your company/organisation/charity):

- I confirm that I am from a Black, Asian or other minority ethnic background OR our directorship is at least 51% Black, Asian or minority ethnic.
- I confirm that 51% of trustees and governing members are from Black, Asian or minority ethnic

Additional:

- Are you majority-led by Black and minoritized communities (75% Trustees and/or 50% senior staff)?

We are currently working on changing questions asked in our e-tendering portal to capture this data from suppliers.

In order to track the delivery of this proposal and impact on the local community and supply chain this will need to be implemented.

## 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 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.

We launched a public consultation on our budget proposals between 09<sup>th</sup> November 2023 to the 21<sup>st</sup> December 2023. This consultation set out all the savings proposals we had identified to produce a balanced budget in the context of reduced available funding and increasing financial pressures.

## 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.

All responses to the Budget Consultation will be analysed and included in the Council's Budget report that will be published on the Bristol City Council website in early 2023. We will take Budget consultation responses into account when developing this and other final proposals to put to the Cabinet and a meeting of the Full Council for approval. The final decision will be taken by Full Council at its budget setting meeting in February / March 2024.

Following the setting of the overall budget envelope We meet quarterly with a local community group of suppliers via the Black South West Network as part of our commitment to make Procurement & Contract Management more accessible.

Full consultation and scrutiny was completed on the Procurement & Contract Management Strategy with input from .

Procurement Engagement workshops will continue to be held quarterly which is held and advertised externally via Black South West Network.

Supplier engagement days are scheduled jointly with Constellia to bring awareness to the contract and help local suppliers register so they can be included in any requests for quotes. This will be advertised via BCC Website, social Media, Federation of Small Businesses and Chamber of Commerce.

This will help to ensure that our services and actions are informed by the views and needs of all our citizens.

### 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)

Even when we plan to consult in more detail on specific service delivery proposals at a later time, we must ensure that any budget setting decisions that are likely to affect future services are informed by sufficient consultation and proper analysis. This is so that decision makers can have due regard to any likely disproportionate or negative impact on the basis of their protected and other relevant characteristics at the time the budget is approved – not afterwards<sup>1</sup>.

Decision makers will have the ability to make changes to the individual spending plans following further consultation as appropriate and detailed evaluation of the impact of specific proposals. Within the proposed budget envelope there will be financial mitigation put aside for any non-delivery or amendments to proposals which may occur due to future consideration of equalities issues or other factors.

As well as identifying whether budget changes will have a disproportionate impact on particular groups (e.g., because they are over-represented in a particular cohort), we need to pay particular attention to the risk of indirect discrimination: when an apparently neutral decision puts members of a given group at a particular disadvantage compared with other people because of their different needs and circumstances.

We are also aware of existing structural inequalities and particular considerations, issues, and disparities for people in Bristol based on their characteristics, which we will take into account.

Whilst there is no direct impact on people with protected characteristics – there is an impact on the Bristol Local Community and supply chain. The contract has a clear commitment to supporting local workforce and awarding more contracts to local suppliers. As shown above in the Census data we have a diverse population of 18.9% who could all be positively affected by us awarding more contracts locally and to diverse suppliers.

To determine a 'diverse supplier' we ask: *"Would you define your company/organisation/charity etc as a diverse supplier?"*

Definition – (please tick which definition applies to your company/organisation/charity):

- I confirm that I am from a Black, Asian or other minority ethnic background OR our directorship is at least 51% Black, Asian or minority ethnic.
- I confirm that 51% of trustees and governing members are from Black, Asian or minority ethnic
- Are you majority-led by Black and minoritized communities (75% Trustees and/or 50% senior staff)?", hence the considerations made below.

##### **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:	•
Mitigations:	See general comments above
<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	•
Mitigations:	See general comments above
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
	•
Mitigations:	See general comments above
<b>Sex</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	•
Mitigations:	See general comments above
<b>Sexual orientation</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	•
Mitigations:	See general comments above
<b>Pregnancy / Maternity</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	•
Mitigations:	See general comments above
<b>Gender reassignment</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	•
Mitigations:	See general comments above
<b>Race</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>• Ethnic minorities in Bristol experience greater disadvantage than in England and Wales as a whole in education and employment and this is particularly so for Black African people<sup>2</sup>.</li> <li>• In the last census (2011) 16% of the population belonged to a Black, Asian or minority ethnic group and this is likely to be higher now.</li> <li>• The top three countries of birth outside UK for Bristol residents are Poland, Somalia and India.</li> <li>• Although the race or ethnicity pay gap has narrowed in recent years there are still wide pay differences between particular ethnic groups and most minority ethnic groups earn less on average than White British people.</li> <li>• Bangladeshi, Pakistani, and Black ethnic groups are more likely to live in deprived neighbourhoods; and the same groups and Chinese ethnicities are about twice as likely to live on a low income and experience child poverty compared to White groups</li> <li>• Black, Asian and minoritised ethnic households are less likely to own their home and more likely to living in overcrowded housing and intergenerational households. Bangladeshi and Pakistani groups are more likely to live in multi-family households.</li> <li>• Black people in the UK are less likely to hold a driving licence and more likely to rely on public transport.</li> <li>• Black, Asian and minority ethnic groups in Bristol are more likely to find inaccessible public transport prevents them from leaving their home when they want to</li> <li>• Black African young people are disadvantaged in education compared to their White peers<sup>8</sup>. A disproportionately high percentage of Bristol school pupils from Black, Asian and minority ethnic backgrounds are excluded from school and In Bristol pupils with the lowest 'Attainment 8' scores are from Black ethnic background (highest from Chinese ethnic background.)</li> <li>• Organisations may lack cultural competence because minoritised ethnic staff are under- represented.</li> </ul>



	<ul style="list-style-type: none"> <li>• People from Black African, Other, and Black Caribbean groups have persistently high levels of unemployment and almost all ethnic minority groups in Bristol experience employment inequality when compared to White British people.</li> <li>• Black Asian and other minoritised ethnic groups are more likely to be self-employed than the Bristol average and over-represented in low income self-employment including taxis, takeaway restaurants</li> <li>• People from minoritised ethnic backgrounds are underrepresented in political and civic leadership.</li> <li>• People who do not speak English as a main language may require information in plain English and community language translations or videos etc.</li> </ul>
Mitigations:	Hence the focus on increasing suppliers from Black, Asian and Minoritised communities
<b>Religion or Belief</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	•
Mitigations:	See general comments above
<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:	<ul style="list-style-type: none"> <li>• Bristol has 41 areas in the most deprived 10% in England, including 3 in the most deprived 1%. The greatest levels of deprivation are in Hartcliffe &amp; Withywood, Filwood and Lawrence Hill.</li> <li>• In Bristol 15% of residents - 70,800 people - live in the 10% most deprived areas in England, including 19,000 children and 7,800 older people.</li> <li>• There are an estimated 29,045 households living in fuel poverty in Bristol, 14.4% of all households (BEIS, 2022)</li> <li>• 4.6% of households have experienced moderate to severe food insecurity, rising to 11.2% in the most deprived areas of the city (QoL 2021-22)</li> <li>• 34.6% of people in Bristol are dissatisfied with the way the Council runs things, but this is 47.5% for people living in the most deprived areas of the city (QoL 2021-22).</li> <li>• The inequalities gap in life expectancy between the most and least deprived areas in Bristol is 9.9 years for men and 6.7 years for women.</li> </ul>
Mitigations:	See general comments above
<b>Carers</b>	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	•
Mitigations:	See general comments above
<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



The scale of the potential gap in our core funding means that there is very limited opportunity to bring genuine additional benefit to equalities groups in the circumstances. However, we have considered as far as possible the need to: eliminate discrimination, harassment, victimisation and any other conduct prohibited under the Equality Act 2010; advance equality of opportunity between people from different groups; and foster good relations between people from different groups.

Our budget savings proposals are aligned to our Corporate Strategy and although we have limited resources our future focus will be on achieving those priorities, we have identified including tackling poverty and intergenerational inequality.

## 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:

None

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

- Employment: we believe that local people being in high quality employment can transform the lives of individuals, families and communities.
- Local suppliers: we believe we have highly skilled and competitive suppliers in Bristol, and so trying to use them where possible helps these organisations to grow, develop and create more local employment.
- involve community stakeholders, voluntary and community sector organisations and other interested parties when we consult on what service is needed and how it should be delivered.
- Engagement with suppliers and representative groups to help local suppliers understand our procurement processes, decide if public sector contracts are right for them, if they are ready to tender and how they can submit the best possible bids
- Supplier diversity: we believe it's important that the suppliers who deliver services to Bristol support our equality and diversity aims and reflect our city.
- Partnerships: we believe that as part of our One City Approach, we can only achieve our goals for Bristol by working even more closely with a wide range of private, public and voluntary organisations.

### 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
All relevant EqlAs will be published on the Council's website <a href="https://www.bristol.gov.uk/council-spending-performance/council-budgets">https://www.bristol.gov.uk/council-spending-performance/council-budgets</a> and continue to be updated as appropriate.		

### 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.

Our Equality and Inclusion Annual Progress Reports show what we have done to achieve the aims of our Equality and Inclusion policy and strategy, and the progress we have made including reporting on all relevant KPIs and workforce diversity [Equalities policy - bristol.gov.uk](https://www.bristol.gov.uk/equality-and-inclusion-policy)  
[The Procurement And Contract Strategy 2023-2027 action plan will monitor and report progress regularly.](#)

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> <b><i>Reviewed by Equality and Inclusion Team</i></b>	<b>Director Sign-Off:</b> Denise Murray
Date: 14/12/2023	08/01/2024

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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.