

Equality Impact Assessment / Equality Analysis

(updated May 2021)

Title of service or policy	B&NES Food Equity Action Plan 2022 - 2025
Name of directorate and service	Public Health and Prevention Services
Name and role of officers completing the EIA	Cathy McMahon, Development and Commissioning Manager, Public Health
Date of assessment	27/04/2022

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website.

1.	Identify the aims of the policy or service and how it is implemented.	
	Key questions	Answers / Notes
1.1	<p>Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> • How the service/policy is delivered and by whom • If responsibility for its implementation is shared with other departments or organisations • Intended outcomes 	<p>The B&NES Food Equity Action Plan aims to ensure that everyone living in B&NES can reliably afford and access suitable food to meet their needs for energy, nutrition, and social & cultural connection, with dignity and without resort to emergency food aid</p> <p>The Action Plan will be delivered by the B&NES Fair Food Alliance (BFFA), which is a partnership of over 60 local and regional services and organisations working together to reduce food insecurity. The BFFA is chaired by the Director of Public Health and co-ordination is provided by the public health team supported by funding from St Johns Foundation.</p> <p>The action plan will use a range of KPI’s to help monitor progress including;</p> <p>Increasing uptake of entitlements eg free school meals, pension credits Reducing household food insecurity and children’s experience of hunger Reduction in usage of food banks/other emergency food aid Increase in knowledge, awareness of household food insecurity amongst agencies and how to access support Increase in early intervention on food insecurity Increase in sustainable food/community hubs Reduction in need for emergency financial support</p>

		<p>Increase in use of green spaces for food growing</p> <p>Number of schools in B&NES completing Poverty Proofing Schools Audit</p>
1.2	<p>Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> • Is it a new service/policy or review of an existing one? • Is it a national requirement?). • How much room for review is there? 	<p>The B&NES Fair Food Alliance has been in operation since March 2020 and following a review of progress and consultation with stakeholders, it has refreshed its priorities and has developed a new action plan for the period 2022 – 2025.</p> <p>There is no national requirement for areas to have food equity action plans. The action plan will be presented to the BFFA on a regular basis and is a live document therefore there are ongoing opportunities for review during the life of the plan.</p>
1.3	<p>Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>The aims of the plan link to the Corporate objectives of the Council in terms of its overarching aim ‘to improve people’s lives’ and address inequalities in life experiences. It also aligns with the key themes of prevention and giving people a bigger say and we have specifically commissioned research to understand the needs of those with lived experience of food insecurity to inform the Action Plan.</p>
<p>2. Consideration of available data, research and information</p>		

Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:

- **Demographic** data and other statistics, including census findings
- Recent **research** findings (local and national)
- Results from **consultation or engagement** you have undertaken
- Service user **monitoring data** (including ethnicity, sex, disability, religion/belief, sexual orientation and age)
- Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations
- Analysis of records of enquiries about your service, or **complaints** or **compliments** about them
- Recommendations of **external inspections** or audit reports

	Key questions	Data, research and information that you can refer to
2.1	What equalities training have staff received to enable them to understand the needs of our diverse community?	Members of the public health team who co-ordinate the Alliance have received equalities training as part of their core role. Members of the alliance have access to Dignity in Practice training and several organisations are now taking part in this.
2.2	What is the equalities profile of service users?	The Food Equity Action Plan is delivered by a range of services across the B&NES area. We are currently in the process of collecting data from food projects in B&NES to better understand the profile of service users. The organisations in B&NES receiving food supplies from Fare Share SW and redistributing this to local people are working predominantly with families with children and people on low or no income. Recipients also include people who are homeless, older people and those with a focus on mental health.

		<p>Research from the Trussell Trust¹ in 2017 identified the key groups using emergency food aid as single working age adults without children, lone parents with children, and families with three or more children. Amongst these groups there was also a high proportion of people living with disabilities and/or long-term health conditions.</p> <p>Of those accessing welfare support in B&NES during 21/22 the majority were living in social rented housing (80%) with 13% living in private rented accommodation and 7% other household types.</p>
2.4	Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?	In Autumn 2021 qualitative research was commissioned from University of Bath to help with understanding the lived experience of household food insecurity in B&NES. The initial findings of this research were presented to alliance and community members in April 2022 and a full report is due in May 2022.
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>The consultation process in development of the plan has been ongoing since November 2021. This has involved talking to the task groups of the BFFA – the affordable food network (AFN) and the income maximisation group (IMG), carrying out a virtual workshop with key stakeholders, commissioning research on lived experience from Bath University and presenting the draft plan to the Prevention and Early Intervention Sub Group of the Community Safety and Safeguarding Partnership, alongside engagement with other Council working groups such as the Healthy Start Working Group.</p> <p>During the consultation process stakeholders and local people identified best practices/ideas for engaging both existing service users and reaching out to communities not represented in their services particularly older people, BAME groups and young people 18 – 25 yrs living away from home. These ideas will be made into a guide for local groups to support staff training and awareness of best practice in community engagement.</p>

¹ https://www.trusselltrust.org/wp-content/uploads/sites/2/2017/07/OU_Report_final_01_08_online2.pdf

		The Bath University research referred to above will be published as a report on the B&NES website and the recommendations incorporated into the Action Plan.				
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	We plan to continue our conversation with local residents to involve them in the development and delivery of the action plan. We will use the feedback received so far and the guide referred to above to inform our approach.				
3. Assessment of impact: ‘Equality analysis’						
	Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy: <ul style="list-style-type: none">Meets any particular needs of equalities groups or could help promote equality in some way.Could have a negative or adverse impact for any of the equalities groups					
		<table><tr><th>Examples of what the service has done to promote equality</th><th>Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this</th></tr><tr><td><p>3.1 Issues relating to all groups and protected characteristics</p><p>The Action Plan is applicable to all groups in the community who are experiencing food insecurity. The alliance terms of reference clearly state the equalities principles in which it will work. These include;</p><p>The Right to Food</p><p>The Right to Food is about ensuring that all people regardless of their gender, race, immigration status or age are able to access food in a dignified way. The United Nations Convention on Human Rights, to which the UK government is a signatory, declares that it is the State that</p></td><td></td></tr></table>	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this	<p>3.1 Issues relating to all groups and protected characteristics</p> <p>The Action Plan is applicable to all groups in the community who are experiencing food insecurity. The alliance terms of reference clearly state the equalities principles in which it will work. These include;</p> <p>The Right to Food</p> <p>The Right to Food is about ensuring that all people regardless of their gender, race, immigration status or age are able to access food in a dignified way. The United Nations Convention on Human Rights, to which the UK government is a signatory, declares that it is the State that</p>	
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		<p>has an obligation to fulfil the right to food.²</p> <p>The Right to Food is defined by former United Nations Special Rapporteur Jean Ziegler as: “The right to have regular, permanent and unrestricted access, either directly or by means of financial purchases, to quantitatively and qualitatively adequate and sufficient food corresponding to the cultural traditions of the people to which the consumer belongs, and which ensure a physical and mental, individual and collective, fulfilling and dignified life free of fear.”</p> <p>The UK has ratified a number of international treaties that refer to the Right to Food and broader socioeconomic rights. These include the International Covenant on Social, Economic and Cultural Rights, the convention on the rights of the child and the convention on the rights of people with disabilities.³</p> <p>By adopting this principle, the alliance is looking to raise awareness of the universal right to access food, with the aim of specifically empowering those with lived experience.</p> <p>Addressing health inequalities</p> <p>Food insecurity disproportionately impacts on women and children and those with long term conditions and disabilities. By developing a food equity action plan in partnership with a wide range of local stakeholders and partners, we will strengthen collective action to support residents experiencing food poverty and through a focus</p>	
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² <https://www.ohchr.org/en/issues/food/pages/foodindex.aspx>

³ https://www.sustainweb.org/resources/files/reports/Why_we_need_the_right_to_food.pdf

		<p>on preventative action contribute towards addressing health inequalities longer term. It must also be acknowledged that the impact of the COVID 19 pandemic will affect a wider proportion of the population and broaden the profile of those experiencing food poverty in the short to medium term.</p> <p>Social perspective of poverty</p> <p>Food insecurity is driven by of a combination of structural issues relating to the security and cost of housing, quality of employment, adequacy of welfare provision and the cost of living generally.</p> <p>A social perspective of poverty is concerned with the structures and organisation of society and how it relates to social problems and individual lives, looking at the issue of poverty through the lens of how society is organised rather than a focus solely on individuals' behaviour and choices.</p> <p>Involving those with life experience</p> <p>This work will be guided by the meaningful involvement of people with life experience of food insecurity. Those with lived experience will be actively involved at all levels to identify and develop local solutions as well as advocating for longer term sustainable action both locally and nationally.</p> <p>Community engagement</p> <p>Engagement with local residents, communities and the 3rd sector is essential to understanding need and developing sustainable solutions to food insecurity. This work will reflect the principles in the Council' Community Engagement Charter.</p>	
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		<p>Safeguarding</p> <p>This principle relates to our moral duty of care to provide a healthy food system for all.</p> <p>Future proofing</p> <p>This means taking into account how local responses to food insecurity can be resilient to local, national and global change including the transition of residents to Universal Credit, the impact of COVID 19, Brexit and climate change for example.</p>	
3.2	Sex – identify the impact/potential impact of the policy on women and men.	Women with children are disproportionately impacted by food insecurity. The work of the alliance has a significant focus on families with children e.g 16/35 projects within the affordable food network are working directly with households with children.	
3.3	Pregnancy and maternity	The Healthy Start scheme is a key benefit for those who are pregnant and on low income and uptake of this scheme is actively promoted by the alliance.	
3.4	Gender reassignment – identify the impact/potential impact of the policy on transgender people	<p>Stonewall research indicates that trans people can be at risk of homelessness due to discrimination in accessing housing.</p> <p>The Action Plan is applicable to all groups in the community who are experiencing food insecurity.</p>	
3.5	Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health)	Those with long term health conditions are at risk of food insecurity if they are on low income or unable to work due to their condition or have additional expenses due to their health needs for example. The Action Plan has identified the need to engage further with groups supporting those with disabilities to ensure awareness and access to local affordable food and financial support.	

3.6	Age – identify the impact/potential impact of the policy on different age groups	<p>AFN members are working with all age groups in the community.</p> <p>The Action Plan consultation has identified a need to better understand the barriers to food security for older people and those aged 18 – 24 yr who are living away from home.</p>	
3.7	Race – identify the impact/potential impact on across different ethnic groups	<p>The BFFA has engaged proactively with BEMSCA to support active engagement in the affordable food network and understanding of specific food needs and preferences.</p> <p>The AFN have developed a list of Ukrainian foods to encourage provision by projects where appropriate</p> <p>The AFN has proactively engaged with Bath Welcome Refugees to help with support to asylum seekers in B&NES</p>	
3.8	Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	<p>The alliance action plan is looking to benefit everyone experiencing food insecurity.</p> <p>Some research suggests LGBT young people are at higher risk of homelessness due to conflict within the family linked to coming out.</p> <p>The action plan has identified a need to better understand the needs of young people living away from home.</p>	
3.9	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	The action plan priorities treat married and civil partnered people equally.	
3.10	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also	The alliance has active representation from a range of Christian organisations and has been working to reach out to organisations representing the Muslim community to better understand needs.	

	upon those with no religion.		
3.11	Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).	The alliance action plan is aimed at specifically supporting those on low incomes to access affordable food and advice and support to maximise their income, manage debt, access employment support and skills and support with digital inclusion.	
3.12	Rural communities* identify the impact / potential impact on people living in rural communities	<p>Rural communities experiencing food insecurity are disadvantaged by the additional costs associated with transport and purchasing goods from small local/convenience stores in particular. Provision of local support services in rural areas is also likely to be less frequent and less accessible.</p> <p>The alliance actively works to ensure provision of advice, information and support is available across the whole of B&NES and maps to areas of high risk of food insecurity. There is good representation from rural areas in the affordable food network.</p>	
3.13	Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services will soon be required by law to pay due regard to the Armed Forces Community when developing policy, procedures	<p>Armed forces community are not represented on the alliance as a body but the work of the alliance members will benefit anyone experiencing financial and food insecurity including members of the armed forces community.</p> <p>Recording participation from the armed forces community is an area for development.</p>	

	and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).		
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*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, when the Armed Forces Bill becomes law there will be a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
The need for improved equalities data for people accessing food projects in the community	Working with Fare Share SW and the Affordable Food Network to gather service user data where available	Data collection process agreed with AFN	Cathy McMahon	Sept 22

Understanding the needs of older people in terms of food insecurity	Use existing or newly formed networks to raise awareness of support in the community for older people experiencing food insecurity	Increased representation from agencies working directly with vulnerable older people in the BFFA	Cathy McMahon	Sept 22
Continue to work on reducing stigma attached to accessing support	<p>Promotion of culturally sensitive and nutritionally balanced and accessible food provision via food banks/clubs/pantries</p> <p>Work with AFN members and 3SG to offer Dignity in Practice training and practice development workshops</p> <p>Proactive engagement of agencies working with marginalised and vulnerable groups, young people living away from home, BAME communities and those with disabilities.</p>	<p>Dignity in practice training plan</p> <p>Increased representation of agencies working with vulnerable groups on BFFA</p>	Cathy McMahon	March 23
Earlier identification of food and financial insecurity in the community	Develop a training package, building in existing resources used by IMG and AFN members, to support induction and staff awareness of early identification and support available	Number of workers trained in early identification	Cathy McMahon	Nov 22
Continue to build local knowledge of need and involvement of those with lived experience	<p>Review report on research findings from University of Bath and incorporate recommendations into FFA action plan as appropriate.</p> <p>Use research findings to develop</p>	<p>Publication of report on website</p> <p>Dissemination of findings</p> <p>Production of community engagement guide</p>	Cathy McMahon	Jun 22

	<p>a resource for local agencies to inform further work on community engagement.</p> <p>Disseminate research and consultation findings to internal and external stakeholders to inform other partnership strategies</p>			
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5. Sign off

Signed off by: Rebecca Reynolds, Director of Public Health and Prevention

Date:04/05/2022