

# Equality Impact Assessment / Equality Analysis

(Updated December 2022)

| Item name   | Details  |
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| <b>Title of service or policy</b>                   | Combined City of Bath and Great Spa Towns of Europe World Heritage Sites Management Plan (2024-2030) |
| <b>Name of directorate and service</b>              | Sustainable Communities, Planning and Building Control   |
| <b>Name and role of officers completing the EIA</b> | Adrian Neilson<br>City of Bath World Heritage Site Manager   |
| <b>Date of assessment</b>                           | May 2025   |

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.

## 1.1 Identify the aims of the policy or service and how it is implemented

| Key questions   | Answers / notes   |
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| <p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> <li>• How the service/policy is delivered and by whom</li> <li>• If responsibility for its implementation is shared with other departments or organisations</li> <li>• Intended outcomes</li> </ul> | <p>The Combined City of Bath and Great Spa Towns of Europe World Heritage Sites Management Plan (2024-2030). World Heritage Site management plans are not a statutory requirement, however UNESCO require each site to produce a management plan (Operational Guidelines (2021) para 108), to be renewed every six years. The Bath World Heritage Sites (WHSs) Management Plan (MP) describes what the site consists of, why it is of global significance, how it is managed, what challenges it faces and how (through an action plan) these will be addressed. This MP will replace the previous plan covering the period of 2016-2022 and has been drafted to include the second inscription.</p> <p>The MP is a collaborative, working partnership document that advocates and promotes collaborative, partnership working with stakeholders, the community and across the Council. It has been prepared through participatory means and in close cooperation with the WHS Advisory Board, which is made up of key stakeholders including, the National Trust, Bath Preservation Trust, representatives from both universities, Wessex Water, elected local members and B&amp;NES Council officers.</p> |

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|   | <p>There will be ongoing engagement and communication on the MP during the 6-year MP period</p> <p>The MP identifies 6 key priorities:</p> <ul style="list-style-type: none"> <li>• Addressing Climate Change</li> <li>• Development</li> <li>• Public Realm</li> <li>• Traffic, Transport and Mobility</li> <li>• Promotion, Interpretation, Inclusion and Presentation</li> <li>• Natural Setting and Nature Recovery</li> </ul> <p>These priorities are consistent with both UNESCO's and the Council's corporate priorities, including improving people's lives, tackling the climate and ecological emergencies, preparing for the future, delivering for local residents and focusing on prevention.</p> <p>Following Cabinet endorsement, the MP (2024-2030) will replace the previous MP (2016-2022) and the actions will be delivered and involve various Council departments and teams, including Heritage Services, Planning Services, as well as other public service providers and the private sector. The intended WHS management outcomes from the MP will be variously monitored as set out in the Actions section of the MP.</p> |
| <p>1.2 Provide brief details of the scope of the policy or service being reviewed, for example:</p> <ul style="list-style-type: none"> <li>• Is it a new service/policy or review of an existing one?</li> <li>• Is it a national requirement?).</li> <li>• How much room for review is there?</li> </ul> | <p>Local authorities, as identified by UNESCO as 'chief stewards' of WHS, are required to prepare and ensure that an up-to-date MP is in place, which is an international requirement. The UK government identified by UNESCO as the 'state party' and signatory to the World Heritage Convention (1972), through DCMS hands down this requirement. This national requirement is likely to be reiterated in the emerging and forthcoming Historic England guidance on management plans. The MP, as stated above, will replace the previous MP, and represents both a continuum of the core purpose of previous management plans as required by UNESCO, which is to safeguard the Outstanding Universal</p>  |

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|  | <p>Value (OUV) of the WHS, i.e. the special characteristics that are of global importance that form the basis for WHS inscription or designation. However, the key differences from this MP to the previous MP (2016-2022) are that it includes the Great Spa Towns of Europe inscription (Bath is one of only 22 of the 2223 WHS globally to be inscribed twice, and this will be the first ever combined MP), and a number of additional actions, including those carried over from the previous MP.</p>  |
| 1.3 Do the aims of this policy link to or conflict with any other policies of the Council? | <p>As stated above, the key priorities of the MP are regarded as being entirely complementary and in alignment with the Council's own priorities and objectives outlined with the Council's Corporate Strategy, including:</p> <ul style="list-style-type: none"> <li>• <b>Tackling the Climate &amp; Ecological Emergencies:</b> 2 of the 6 key priority objectives identified in the Plan relate to these critical issues - Addressing Climate Change; Natural Setting and Nature Recovery, together with actions including research in identifying and understanding the risks posed by climate change, to both the WHS and the community, and the actions and interventions required as a result; also preserving, enhancing and promoting the Green Setting of the WHS, supporting nature recovery initiatives.</li> <li>• <b>Giving People a Bigger Say:</b> the preparation of the Management Plan though 'participatory means' is a key UNESCO concept and requirement. Public consultation on the Management Plan is therefore an essential stage of its preparation and will provide the opportunity for the local and wider community to have their say and contribute. At the heart of the Management Plan and the World Heritage Site inscriptions is the founding concept of World Heritage Sites being for all, promoting participation, inclusivity, accessibility and equality.</li> <li>• <b>Delivering for Local residents:</b> the Management Plan recognises that Bath is a living, dynamic city with a local population and community that live within the WHS that,</li> </ul> |

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|  | <p>unusually, covers the entire city. It recognises that there are both local community needs as well as those of visitors. Through its priority objectives and associated actions, the Management Plan promotes and supports many initiatives and projects that improve and enhance the quality of life and well-being of the city's residents, including improvements to both the built and surrounding natural environment.</p> <ul style="list-style-type: none"> <li>• <b>Preparing for the Future/Focusing on Prevention:</b> the Management Plan focuses on enhancing and improving the WHS and futureproofing, closely aligning with these two Council priorities and also with <b>Tackling the Climate &amp; Ecological Emergencies</b>.</li> </ul> |
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## 2. Consideration of available data, research and information

| Key questions  | Data, research and information that you can refer to  |
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| <b>2.1</b> What equalities training have staff received to enable them to understand the needs of our diverse community? | Service deliverers within the Council have received corporate equalities training. Equalities training is now mandatory for all B&NES employees.  |
| <b>2.2</b> What is the equalities profile of service users?  | <p>The MP covers the City of Bath WHS Council local authority area. Link to the most up to date for the B&amp;NES area (including Equalities data) can be found at:<br/> <a href="https://beta.bathnes.gov.uk/strategic-evidence">https://beta.bathnes.gov.uk/strategic-evidence</a></p> <p>The MP includes some analysis of the socio-economic makeup of the City of Bath.</p> |

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| <p><b>2.3</b> Are there any recent customer satisfaction surveys to refer to? What were the results? Are there any gaps? Or differences in experience/outcomes?</p>             | <p>This report seeks endorsement of the MP. Customer satisfaction will be considered as part of the delivery of the actions within the MP.</p>   |
| <p><b>2.4</b> What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?</p>   | <p>The MP has been reviewed following extensive consultation with key stakeholders over a year and a half period, and members of the public during an 8-week public consultation. Comments and advice from all have resulted in significant amendments to the MP.</p>  |
| <p><b>2.5</b> If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?</p> | <p>There will be ongoing engagement and communication on the MP and its priorities and actions throughout the MP period of six years. It is envisaged that this process will provide opportunities for communities and stakeholders, including seldom-heard groups to be involved. The overall intended outcome is to ensure that all communities and stakeholders are involved, including local, national and international consistent with the UNESCO's core principle of WHS being for everyone regardless of national boundaries.</p> <p>The MP will be made available on the Council's website in an accessible format consistent with legal requirements regarding accessible online content and information, and there will be a variety of opportunities to provide feedback, and Equalities data and feedback will continue to inform how we measure performance and improvement in relation to equality and diversity.</p> |

### 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:

- 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

## **Combined City of Bath and Great Spa Towns of Europe World Heritage Site Management Plan (2024-2030)**

Throughout the public engagement process the equalities impact of the MP will be carefully considered. The MP includes priorities relating to climate change, the natural environment and nature recovery, local economy, health, well-being of communities, heritage and design, sustainable development, sustainable transport.

| <b>Key questions</b>   | <b>Examples of what the service has done to promote equality</b>   | <b>Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this</b> |
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| <b>3.1 Issues relating to all groups</b> and protected characteristics | Opportunities for the MP to address equalities issues and needs of people with protected characteristic include through its actions include: <ul style="list-style-type: none"><li>- sustainable development</li><li>- inclusive design within the public realm</li><li>- promote the WHSss for everyone</li><li>- inclusive access for older people, students, disabled people, service families etc.</li><li>- addressing climate change, identifying risk and required mitigation, and support sustainable energy and residents with rising energy costs to benefit all</li><li>- support nature recovery initiatives and to ensure access for all to green infrastructure, open spaces and nature recovery opportunities to benefit well-being of all, including the local community and visitors alike.</li></ul> |  |

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| <b>3.2 Sex</b> – identify the impact/potential impact of the policy on women and men.  | Through the delivery of the MP actions, it will support initiatives that ensure the WHSs will benefit all regardless of gender or sex. This is consistent with government strategy on Violence against Women and Girls (VAWG), Safer Streets Strategy, and Open Spaces Design for Women and Girls.   |  |
| <b>3.3 Pregnancy and maternity</b>   | Support for inclusive design and access for all to meet access needs of not only older and disabled people, but the whole community, including pregnant & breastfeeding/feeding parents & parents with pushchairs.<br>- The location and design of development is accessible to all and secure by design, including open space, the public realm and transport infrastructure. |  |
| <b>3.4 Gender reassignment</b> – identify the impact/potential impact of the policy on transgender people  | The MP supports inclusivity and equal access for all within the WHSs.  |  |
| <b>3.5 Disability</b> – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical, sensory and mental impairments and mental health) | The MP supports the delivery of inclusive design within the WHSs.  |  |
| <b>3.6 Age</b> – identify the impact/potential impact of the policy on different age groups  | The MP promotes access and enjoyment of the WHSs for all and inclusivity regardless of age.<br>The risks of digital exclusion particularly for older people will be considered.  |  |



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| <b>3.7 Race</b> – identify the impact/potential impact on across different ethnic groups  | The MP supports inclusivity within the WHSs regardless of ethnicity. There is awareness of the potential requirement for translation services on request and engaging with different ethnicities to enable a global view on the needs of the community who access World Heritage Sites. |  |
| <b>3.8 Sexual orientation</b> – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people   | The MP supports inclusivity within the WHSs regardless of sexual orientation. For instance, engaging with the LGBTQ+ community to understand how to include diversity of thoughts and needs within the design stage of the strategy.  |  |
| <b>3.9 Marriage and civil partnership</b> – does the policy/strategy treat married and civil partnered people equally?  | The MP promotes equality and inclusivity within the WHSs regardless of individual relationship choices.   |  |
| <b>3.10 Religion/belief</b> – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.              | The MP has been prepared in the spirit of UNESCO's founding principles for WHS as being for everyone regardless of differing religious groups and belief systems, including the local Jewish community.   |  |
| <b>3.11 Socio-economically disadvantaged*</b> – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, | The MP promotes access to the WHSs for all regardless of socio-economic status and notes the success of the Council's Discovery Card initiative that provides free access to heritage for all local residents.  |  |

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| employment status can influence life chances<br><b>(this is not a legal requirement, but is a local priority).</b>  |   |  |
| <b>3.12 Rural communities*</b> identify the impact / potential impact on people living in rural communities   | The WHSs are largely an urban site, although it has a formally identified indicative setting that comprises the rural and natural landscape that surrounds the WHSs. However, this is not regarded as disadvantaging those living within the rural areas that the WHSs setting consists of. |  |
| <b>3.13 Armed Forces Community **</b> serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision). | The MP promotes inclusivity and equal access for all, and the WHSs are not regarded as disadvantaging members of the community associated with the armed forces.  |  |

\*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, the Armed Forces Bill (which came in on 22 Nov 2022) introduces 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 Combined City of Bath and Great Spa Towns of Europe World Heritage Sites Management Plan (2024-2030) promotes inclusivity and engagement for all. | The MP to meet the statutory and B&NES Council requirements.  |                     | City of Bath World Heritage Sites Manager | Within the 6-year MP period |
| Accessible format of the MP and on the B&NES website and opportunities for feedback and comments during the 6-year MP period.                         | The MP will be made available on the B&NES website and will be published in an accessible format and include contact details for further accessibility requirements. There will be opportunities to provide feedback. |                     | City of Bath World Heritage Sites Manager | Within the 6-year MP period |

## 5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team ([equality@bathnes.gov.uk](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

**Signed off by:** Sophie Broadfield (Executive Director of Sustainable Communities)  
**Date:** 21 October 2024