

Improving People's Lives

# **Equality Impact Assessment / Equality Analysis** (Updated Oct 2024)

Item name	Details
Title of service or policy	Women's Night-Time Safety Charter
Name of directorate and service	People and Change, Community Safety
Name and role of officers completing the EIA	Emily Patterson, Community Safety Business Support Officer
Date of assessment	28.10.2024

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
<ul> <li>1.1 Briefly describe purpose of the service/policy e.g.</li> <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>	The Women's Night-Time Safety Charter is a voluntary commitment for businesses in the night-time economy to adopt practices that enhance women's safety in public spaces. The charter outlines core principles for safer, more inclusive environments between 6pm and 6am, targeting venues such as pubs, clubs, restaurants, hotels, leisure facilities, competitive socialising and transport services including private hire and other night-time establishments. Signatories will receive a certificate and have access to a full toolkit and resources. There is also a training offer to groups and businesses that pledge their support to the Charter. <a href="https://www.ntesacademy.com/bundles/Bystander-Intervention-Training-Avon-and-Somerset">https://www.ntesacademy.com/bundles/Bystander-Intervention-Training-Avon-and-Somerset</a> .
	The charter's delivery is a collaborative effort, between the local authorities of Bath and North East Somerset, Somerset, North Somerset, South Gloucestershire, the Office of the Police and Crime Commissioner (OPCC) and night-time economy businesses  Under the Safer Streets 5 Funding initiative, the Office the police and crime commissioner (PCC) directly manage funds to work alongside local authorities in deploying targeted, community-oriented interventions.

The main goal of the charter is to reduce violence against women and girls (VAWG), by encouraging businesses to commit to safety-focused practices. It aims to create safer, more welcoming spaces at night, reduce incidents of harassment, and empower staff and bystanders to act. The charter also seeks to improve trust between the public, businesses, and local authorities, creating a network dedicated to community safety and inclusivity.

- 1.2 Provide brief details of the scope of the policy or service being reviewed, for example:
  - Is it a new service/policy or review of an existing one?
  - Is it a national requirement?).
  - How much room for review is there?

Following the council's <u>cross-party motion on safety for women and girls in public spaces</u> 2021, the combined local authorities of Bath and North east Somerset, North Somerset, Somerset, South Gloucestershire, the Office of the Police and Crime Commissioner (OPCC), and night-time economy, applied for and secured funding through a Safer Streets 5 bid.

<u>The Safer Streets fund</u> is a Home Office initiative, of which one of the key areas of focus is on addressing Violence Against Women and Girls (VAWG).

Following a successful bid and building on the existing Women's Safety Charters from different local authority areas, a group was established to oversee the implementation of the Safer Streets 5 A&S VAWG proposal, with a specific focus on developing and promoting a Women's Safety Charter.

Group representatives include:

- Avon and Somerset OPCC (Chair)
- Community Safety Partnerships (CSPs): Local authority representatives from the community safety teams.
- Local Authorities: Relevant departments including licensing, communications, and community safety.
- Partner Organisations: Any other partner agencies considered relevant by the above.

Under the Safer Streets 5 bid terms of reference, local authorities have the following key responsibilities:

 To consider the best ways to embed the Charter locally, including how it will be hosted on their websites.

- To promote the Charter through local authority channels and engage businesses in the NTE to sign the pledge.
- To utilise the social media campaign provided by OPCC.
- To manage signatories and track registrations through designated platforms.

To use the mobilisation fund to support communications campaigns and web development for local Charter promotion.

## 1.3 Do the aims of this policy link to or conflict with any other policies of the Council?

The Women's Night-Time Safety Charter supports the governments <u>Tackling Violence</u> <u>Against women and Girls Strategy 2021</u>, which highlights the need to make the safety of women and girls a top priority.

The aims of the Women's Night-Time Safety Charter strongly align with several existing council policies and priorities. It supports the following:

Joint Community Safety Plan 2022-2025: The plan places priority in protecting the most vulnerable from harm, with a focus on male violence against women and girls, specifically domestic abuse, sexual offences, stalking and harassment (which sit under the umbrella term of VAWG). – Key objectives being, to implement the Government's Safer Streets programme, delivering targets and to budget, and to support the Police VAWG plan through the joint 'Night Time Economy Operations' and BCSSP sub-group activities.

The plan also prioritises strengthening and improving local communities to improve outcomes for local people, with a focus on supporting victims of crime and anti-social behaviour as well as carrying out public engagement – particularly with underrepresented groups. Key objectives of which, are to work alongside partners to promote safety on our streets particularly in response to national campaigns regarding women's safety in public areas.

<u>Corporate Strategy's 2023-2027</u>: The Women's Night-Time Safety Charter aligns with the council's corporate strategy, where its main purpose is to improve people's lives, with a key priority of giving people a bigger say. This links to the councils 3 principles, particularly focusing on prevention – investing across all services to tackle inequality and

improve local areas, as well as supporting vulnerable adults and children, securing safe, effective services that meet their needs.

Equality Act 2010: The Equality Act 2010 and its recent amendments introduced a mandatory duty for employers to take proactive measures to prevent sexual harassment in the workplace. This legal obligation requires employers to demonstrate compliance by fostering a safe working environment and actively working to prevent harassment before it occurs. The law also covers harassment by third parties, such as clients or customers, and imposes penalties on employers who fail to meet these obligations.

Introducing the Women's Night-Time Safety Charter aligns with the council's commitments to equality. It supports the night-time economy by focusing on gender-based safety and fostering inclusive public spaces where women feel welcome and safe.

The Women's Night-Time Safety Charter aligns closely with VAWG safeguarding laws and policies. It promotes safe practices for women in public night-time spaces by creating accountability among venues, community organisations and the local authority. It aligns with the following UK Government legislation:

Domestic Abuse Act 2021

Sexual Offences Act 2003

Female Genital Mutilation Act 2003 (Amended 2015)

Modern Slavery Act 2015

Forced Marriage (Civil Protection) Act 2007

Protection from Harassment Act 1997 (Amended by the Protection of Freedoms Act 2012)

Stalking Protection Act 2019

Serious Crime Act 2015

Voyeurism (Upskirting) Act 2019

Safeguarding Vulnerable Groups Act 2006

Children Act 1989 and 2004

Licencing Act 2003 – Public Safety and Prevention of Crime

Clare's Law (Domestic Violence Disclosure Scheme)

### 2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to		
2.1 What equality training have staff received to enable them to understand the needs of our diverse community?	<ul> <li>B&amp;NES Corporate Equality Training</li> <li>OPCC: Home Office approved Supporting Safer Communities training, delivered by the Police and Crime Prevention Academy.</li> <li>OPCC: PTSA training – Inclusive Commissioning</li> <li>Avon and Somerset Police Inclusion and Diversity Plan 2019-2024.</li> <li>Member of the National Equality Standard (NES)</li> <li>Disability Confident Employer</li> </ul>		
2.2 What is the equality profile of service users?	<ul> <li>Disability Confident Employer</li> <li>The equality profile of service users for the Women's Night-time Safety Charter reflects the diversity of those who participate in Bath and North East Somerset's night-time economy. This includes residents, visitors, and workers from a range of backgrounds and demographics.</li> <li>The primary focus of the charter is on women's safety in night-time settings. It acknowledges that women often face distinct safety concerns related to violence, harassment, and fear of assault. Women from various backgrounds, including age, ethnicity, sexual orientation, and disability status, are primary recipients, as they experience vulnerabilities in night-time spaces.</li> </ul>		
	NTE customers span a broad age range. This includes all age groups who frequent pubs, clubs, and entertainment venues. Service users reflect the diversity of the area, and the charter aims to ensure inclusivity for all. It recognises that women from ethnic minority backgrounds may face additional cultural or social barriers when reporting incidents or accessing support.  The charter includes measures to include physical safety and accessibility directly relevant to the safety of Disabled people. Training for staff helps to ensure a sensitive		

approach to users with physical, sensory, or cognitive disabilities who may face unique risks or challenges in night-time settings.

NTE customers come from a variety of economic backgrounds. The charter aims to create a universally welcoming and safe environment regardless of economic status.

Given Bath's popularity as a tourist destination, many visitors may be unfamiliar with local resources and may have additional safety concerns. The charter includes measures to ensure the night-time spaces are visibly safe and accessible.

Whilst the Women's Night-Time Safety Charter targets violence against women and girls, it is important to note that boys and men can also be victims. This equality profile informs the charters principles, ensuring they address a diverse range of needs – to promote inclusive, safe spaces for all members of the community, regardless of their protected characteristic.

**2.3** What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?

This EIA is considered a working document and will be updated with relevant information gained from this process.

The OPCC have leveraged external and internal expertise where possible, including consultation and advice from key partners and colleagues, incorporating areas where Charters are already in existence. This includes conversations and sharing of knowledge with Bristol, London, Exeter, Swindon and Wiltshire and Dorset. Communications experts including NTES (who helped with the development of the London Charter) have also been consulted, as well as the OPCC's internal communications colleagues, who have advised. In addition to this women's safety perceptions survey was launched, with 300+ responses received. This was used to understand how women and girls felt navigating the Night Time Economy and to identify their concerns. The OPCC have used this feedback to inform the Charter principles and its local flair. The Bath Business Improvement District (BID) has consulted the Safe and Secure Night-Time Economy Group and keeps them updated. There is demand for this type of intervention and the BID and Avon and Somerset Police have previously trained NTE staff from most NTE venues on spiking, it was well attended. The Domestic Abuse Partnership (DAP) have been briefed.

Bath & North East Somerset will continue to identify equality impacts through the assessment process, using data from our dashboard to understand local and regional needs and trends. This approach enables us to monitor key indicators, ensuring our initiatives effectively promote inclusivity for all residents. Our data dashboard brings a number of published data sets together to build a profile of each Community Safety Partnership. It is presented at the following geographic levels:

- Avon and Somerset Police Force area
- Avon and Somerset Community Partnership areas
- Lower-layer super output areas.

**2.4** If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equality considerations within this?

A strategy is in draft responding to the domestic abuse act 2021 to outline current provision of domestic abuse and violence services along with refuge provision.

For future consultations on the Women's Night-Time Safety Charter, equality considerations will be central to ensure the charter meets the diverse needs of all potential services users.

Here's how we plan to incorporate this:

- Data driven approach: Monitoring local trends to identify specific groups that may have heightened safety concerns.
- Engage diverse stakeholders: This will ensure that voices of diverse community members are included and that we address the unique safety concerns of each group.

We aim to ensure the charter is fully inclusive, responsive to diverse needs, and effective in promoting safety for everyone within Bath and North east Somerset's night-time economy.

#### 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 equality groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equality groups

Key questions	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
3.1 Issues relating to all groups and protected characteristics	The women's safety charter is expected to have a positive impact on the safety and inclusivity of night-time economy spaces. Particularly for women, people from marginalised groups, and those at increased risk of hate crime and or discrimination.	The charter is voluntary. This may mean that some businesses may not adopt the principles. This may potentially create inconsistencies in safety standards across venues.
	The charter's principles, toolkit and resources are designed to create safer spaces for women, reduce harassment and predatory behaviour, and empower night-time economy staff to act proactively. It also emphasises	Some smaller businesses might also struggle to implement all the safety measures suggested due to resource constraints.  To mitigate this, the charter toolkit and
	By addressing various forms of harassment and encouraging inclusivity, the charter will promote a more positive experience for all individuals, regardless of gender, race, sexual orientation or any other protected characteristic.	support materials are all free. We will aim to ensure businesses have minimal financial barriers to participation.  Monitoring uptake and evaluating impact over time will help identify gaps and areas for improvement.
	By signing the charter, businesses commit to promoting a safe, respectful environment for all. This approach supports a broader, inclusive culture that benefits everyone. This	

	reduces harm and encourages respect across the night-time economy.	
3.2 Sex – identify the impact/potential impact of the policy on women and men.	The charter directly addresses women's safety, empowering night-time economy businesses to take proactive measures to prevent harassment and violence. By providing guidelines and resources, it promotes a safer environment for women, enhancing their ability to freely participate in the night-time economy.  The Charter's training component will help staff recognise and address gender-based harassment, benefiting women and other individuals who may experience harassment based on perceived gender.  The charter emphasises bystander intervention, empowering men to actively contribute to a safe environment. This involvement helps shift perceptions of responsibility, showing that safety is a shared community goal.  The charter's training provides men with the tools to recognise inappropriate behaviour, reinforcing the importance of support and active intervention. This inclusion helps foster a culture where men are allies in women's safety efforts.	Some men might feel that the focus on women's safety sidelines their safety concerns, leading to resistance against the charter. Additionally, the charter could inadvertently create a negative stereotype around men in nightlife settings. It is also important to note that boys and men can also be victims of gender-based violence.  To mitigate this, we will clearly communicate that the charter aims to create a safe environment for everyone, including boys and men. We have developed initiatives to encourage men to be allies in promoting safety, such as bystander intervention training.
3.3 Pregnancy and maternity	The charter's focus on creating safe environments is crucial for pregnant individuals who may wish to participate in	Night-time venues may not adequately address the specific needs of those who are pregnant, such as seating and

social activities. Venues that are free from harassment and violence can help expectant people feel secure while out in public. Similarly, the charter's emphasis on creating inclusive spaces can lead to improvements in venue accessibility, making it easier for pregnant individuals to navigate. This includes considerations such as seating arrangements, rest areas, lighting and safe transportation options.

safety protocols are not clear.

To mitigate this, considerations should be taken in both the Charter and VAWG intervention training to ensure that venue staff have clear guidelines on the unique needs of pregnancy and maternity.

accessibility. Pregnant people may be

hesitant to attend nightlife venues where

New parents, including those on maternity leave, may desire to engage in social settings. The charter can help establish welcoming and inclusive venues where they can connect with others, reducing feelings of isolation during this transition.

**3.4 Gender reassignment** – identify the impact/potential impact of the policy on transgender people

The charters commitment to safety and inclusivity encourages safe spaces for all gender identities. By promoting environments free of harassment, the charter helps ensure that everyone feels welcome and safe.

By encouraging businesses to sign up and adhere to the charter, there is an implicit recognition of the need for safe spaces that respects and affirms diverse gender identities.

By fostering a culture of accountability, the charter can help dismantle prejudices and encourage acceptance in night-time venues.

Transgender and non-binary individuals may feel excluded from safety initiatives that particularly focus on women.

There may be instances of discrimination or misunderstanding in venues if staff are not properly trained.

To mitigate this, we will consider how the charter includes protections and considerations for all gender identities. We will clearly communicate that the charter aims to create a safe environment for everyone.

**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)

The charter encourages safe and inclusive spaces, which can indirectly promote better accessibility within venues.

Ensuring physical environments are accessible could make disabled women feel safer and more included. This includes considerations such as seating arrangements, rest areas and safe transportation options.

Night-time venues may not adequately address the specific needs of disabled people – they may lack adequate accessibility features limiting safe access. Poor lighting or crowded spaces can also present safety concerns.

Safety information and reporting channels may not be accessible to all. Individuals with visual, hearing, or cognitive disabilities might face barriers in accessing information about reporting procedures or bystander assistance.

Loud music, crowded spaces, and poor lighting in venues can pose additional challenges for people with sensory sensitivities. Particularly those with neurodiversity or hearing impairments. Deaf women are twice as likely to experience domestic abuse and are at increased risk of sexual abuse: <a href="https://signhealth.org.uk/for-professionals/domestic-abuse-service/">https://signhealth.org.uk/for-professionals/domestic-abuse-service/</a>.

Disabled people may face greater difficulty accessing safe, reliable, and accessible transport at night. Limited accessible taxis or public transport could increase their vulnerability, as they may be waiting longer in potentially unsafe situations.

To mitigate this, considerations will be taken within the VAWG intervention training to ensure that venue staff are aware of and have clear guidelines on accessibility standards – this includes all options mentioned above relating to safe accessible transport options, information in different formats, well-lit areas or designated quiet spaces. **3.6 Age –** identify the impact/potential Young women often face heightened safety Younger women are often more impact of the policy on different age concerns in nightlife environments. The vulnerable to harassment and may not be groups charters principles and guidance on inclusive fully aware of safe practices or feel and safe spaces will benefit younger empowered to report incidents. Without demographics who frequently engage in the specific outreach or engagement, they may not take full advantage of the charter night-time economy. resources or feel adequately supported in Some older adults may also feel vulnerable night-time environments. in nightlife settings. Inclusive design principles ensure these spaces are To mitigate this, we will be raising accessible and safe for individuals across all awareness on the charter, bystander intervention training, to ensure that it is age groups. accessible and remains relevant to everyone. We will share with our community safety partnership to promote its safety messaging. The charter will encourage venues to adopt inclusivity measures that make spaces feel welcoming for all ages. This includes seating areas, clearer signage, and that staff are trained to support people of all ages.

3.7 Race – identify the impact/potential impact on across different ethnic groups	Businesses signing up to the charter are encouraged to create inclusive spaces, which fosters a safer, more welcoming environment for women and people of all ethnicities and backgrounds.	Women from diverse racial or ethnic backgrounds may experience harassment that intersects with racial or cultural identity. Considerations will be made to address anti-discrimination measures within the bystander intervention training to ensure a more comprehensive response.
3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	LGBTQ+ women may face unique safety concerns in night-time spaces. The charter's focus on challenging harmful behaviour and promoting bystander intervention can improve the experience for LGBTQ+ women and other vulnerable groups.  Businesses signing up to the charter are encouraged to create inclusive spaces, which fosters a safer, more welcoming environment for everyone.	
3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	The charters commitment to a safer night- time environment supports inclusivity for all. This includes those in marriages and civil partnerships – by creating spaces where they can socialise without fear of harassment or violence.  The charter's focus on addressing violence and harassment also signals a broader community commitment to preventing abuse, including within domestic relationships.  By fostering environments where unacceptable behaviour is clearly	

3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	challenged, the charter can promote awareness and support for healthy relationships across the community.  Some women may have religious or cultural concerns regarding nightlife environments.  The charter can promote cultural sensitivity, helping staff understand diverse needs and feeter a respectful environment for all	
a.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).	foster a respectful environment for all.  Ensuring safer environments may encourage more women from various socio-economic backgrounds to participate in the night-time economy. This includes working individuals or students who may have limited choice in their hours of social engagement.	Smaller, lower-cost venues may not have the resources to fully implement the charters safety measures.  The charter's resources will be offered without charge, reducing barriers for smaller businesses that might struggle to implement safety measures due to limited budgets. The charter is a voluntary pledge, and by signing up, smaller, low-cost venues can still benefit by meeting core safety principles.
		Other potential barriers that businesses may face include time constraints. For this reason, the toolkit will include guidance in bit size segments.
<b>3.12 Rural communities*</b> identify the impact / potential impact on people living in rural communities	For rural communities where travel distances are longer, the charter's focus on safe transport can encourage venues to promote local options or partnerships, helping women return home safely.	Rural businesses may have limited access to the charter's resources, such as training materials, due to location and fewer night-time venues.  Similarly, smaller businesses may face challenges in allocating resources to fully engage with the charter's principles

effectively. Particularly around staff In smaller, close-knit communities, adopting the charter publicly can encourage more training. open dialogue on women's safety. It can engage residents, creating a positive Ensuring remote access and flexibility in community-wide impact. how the charter is implemented can improve uptake and effectiveness in rural areas. 3.13 Armed Forces Community \*\* Members of the armed forces may use Armed forces members may face stigma serving members; reservists; nightlife venues. The charter's focus on when seeking support related to their veterans and their families, including creating safer environments may enhance own safety. the bereaved. Public services are their social experiences, ensuring they can required by law to pay due regard to enjoy leisure time without concerns about To mitigate this, considerations should be the Armed Forces Community when taken within both the Charter and harassment or violence. developing policy, procedures and intervention training to ensure that venue staff are aware of these issues. making decisions, particularly in the The charter promotes a culture of bystander areas of public housing, education intervention and mutual support, which aligns with the values of teamwork and and healthcare (to remove disadvantage and consider special responsibility found in the armed forces provision). community. This may encourage military personnel to actively engage in safety initiatives, fostering a sense of camaraderie and community involvement. 3.14 Care Experienced \*\*\* It is recognised that care leavers are more Care leavers often have unique needs This working definition is currently vulnerable than others, with women and girls due to their life experiences. The under review and therefore subject to who have been in the care system often charter's guidelines may not fully address more likely to be drawn into exploitation and these specific needs, which could leave change: be the victims of VAWG. care leavers feeling unsupported in In B&NES, you are 'carereporting or dealing with harassment. experienced' if you spent any time in The charter promotes safer night-time vour childhood in Local Authority venues, which is particularly beneficial for Considerations for mitigation include care, living away from your parent(s) female care leavers who may have mental health, and trauma awareness for example, you were adopted, lived experienced instability in their lives. Providing training for staff, with a focus on safe spaces allows them to socialise and in residential, foster care, kinship

care, or a special guardianship arrangement.	engage with their peers without the fear of harassment or violence.	recognising and responding to individuals who may need support.
	By encouraging businesses to commit to the charter, care leavers can find supportive environments that foster community connections. This sense of belonging is crucial for individuals who may lack stable social support systems.	

<sup>\*</sup>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.

## 4. Bath and North East Somerset Council 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	By when
			responsible	

<sup>\*\*</sup> 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.

<sup>\*\*\*</sup>The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in May 2024 alongside over 50 other Local Authorities. Although we have data for care leavers and children/young people who are currently in the care of B&NES we do not have wider data on disadvantage experienced through being in care.

Monitoring uptake of charter	Identify which premises haven't adopted the Charter and work with them to make it possible. This includes identifying any premises which make part of the night-time economy (including transport services, private hire, hotels and leisure establishments, competitive socialising etc.)	Ongoing	Inclusive Communities Manager, alongside Safer Streets 5 partners
Publicise charter through our communication channels, engage all relevant stakeholders, services and forums.	Brief the Bath City Area Forum  CCTV and City Centre Security  Project to be briefed	Annually	Community Engagement Team Place Management

### 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 Equality Team (equality@bathnes.gov.uk), who will publish it on the Council's website. Keep a copy for your own records.

Signed off by: Cherry Bennett

**Date:** 06.11.2024