

Equality Impact Assessment
For
Proposals for the future of Town
Centre Management & BIDs
Development Strategy

January 2016

EQUALITY IMPACT ASSESSMENT FORM

Stage 1 – screening to establish if the function has any relevance to any equality issue and/or monitored group i.e.

- Could the function affect one or more equality group in a different way to another group?
- Establish whether different equality groups have different needs
- Establish whether the function contributes to or hinders equality of opportunity

1a	<p>Please give a brief description of the function and its purpose*</p> <p>A report on the future of the Town Centre Management & Business Support team will be considered by Members at the Renewal and Recreation PDS Committee meeting on 26 January 2016. The report will propose the withdrawal of the Town Centre Management service, resulting in the deletion of two posts, and the refocusing of remaining resources towards the programme of developing Business Improvement Districts (BIDs) in further town centres across the borough.</p> <p>The Council is in the midst of a period of profound change which is driven by the need to find further significant savings. An additional £50m of savings need to be found during the next four years. In this context the Council has to review all services particularly those which are non-statutory. This includes the Town Centre Management (TCM) service. It has always been the Council's intention to replace Town Centre Management with town centre BIDS and the current proposals merely accelerate the process which started in 2013 with the establishment of the Orpington BID. The logical extension of adopting BIDs is for the TCM Service to be withdrawn completely.</p> <p>The proposal will result in the deletion of the remaining Town Centre Manager roles within this team .The Council will no longer provide a traditional TCM service to any Town Centres including Beckenham and Penge. A new project officer role on a fixed two year contract will be created to undertake the initial groundwork, liaison and project management functions necessary to help establish BID especially in town centres and in other locations. It is hoped that significant progress towards the establishment of BIDS in the remaining main town centres can be achieved within this 2 year period, but the post would be extendable if required subject to available funding and member endorsement</p> <p>The practical impact of this proposed change is that the Council will no longer directly provide officer time or funding to deliver a number of town centre initiatives (e.g. special markets, events, Christmas lights, Poppy displays, town centre promotions, community safety projects etc.) or to facilitate existing town centre networks / groups, as these will ultimately become the responsibility of the BIDs. The proposed new post will, as part of the BID establishment remit, retain responsibility for liaison with businesses and local stakeholders (which may involve attendance at stakeholder meetings) and will also continue to offer signposting and advice to local groups requiring support for their town centre initiatives. Where there are major public realm projects ongoing or in prospect, the Council will make separate arrangements to ensure that traders and other stakeholders are kept fully informed</p> <p>Since 2011 it has been the policy of the Council to support the formation of Business Improvement Districts (BIDs), especially within town centres and this approach has been endorsed by Councillors on several occasions. BIDs provide a sustainable and fair method for the businesses based within a town centre to contribute to and lead on the management and improvement of their locality. Establishing a BID in a locality can lever in far in excess of the resources which would be accessible from Council funded Town Centre Management arrangements. For example since its establishment in 2013 the Orpington 1st BID has generated at least £400k of income, all of which has been spent to the benefit of the town centre, and the new Bromley BID is expected to generate at least £3m of investment in the town over its first 5 years.</p> <p><i>*Function can mean process, service, policy or project</i></p>
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1b	<p>How would you classify the function type?</p> <p><input checked="" type="checkbox"/> The service is provided on the basis of an application and /or targeted then go to question 1c</p> <p><input type="checkbox"/> The service is open to all go to question 1d</p>		
1c	<p>Is the function accessible for all groups? Either tick the box 'Accessible to all groups' and provide <u>relevant evidence</u> OR tick the box for each group to whom the function is <u>not accessible</u> or for whom there may be needs or considerations to accommodate.</p> <table border="1" data-bbox="212 409 1433 712"> <tr> <td data-bbox="212 409 842 712"> <input checked="" type="checkbox"/> *Accessible for all groups <input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Gender <input type="checkbox"/> Marriage & civil partnership </td> <td data-bbox="850 409 1433 712"> <input type="checkbox"/> Pregnancy & maternity <input type="checkbox"/> Race <input type="checkbox"/> Religion & belief <input type="checkbox"/> Transgender or Transsexual </td> </tr> </table>	<input checked="" type="checkbox"/> *Accessible for all groups <input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Gender <input type="checkbox"/> Marriage & civil partnership	<input type="checkbox"/> Pregnancy & maternity <input type="checkbox"/> Race <input type="checkbox"/> Religion & belief <input type="checkbox"/> Transgender or Transsexual
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1d	<p>Is it likely that there will be a negative impact on one or more of the equality groups, or is it clear at this stage that it will be equality neutral? (No negative impact on the groups) Please tick in the box equality neutral OR tick the box for the group(s) that will suffer a negative impact. If you have ticked the box 'equality neutral' please provide evidence.</p> <table border="1" data-bbox="212 857 1433 1160"> <tr> <td data-bbox="212 857 842 1160"> <input checked="" type="checkbox"/> Equality neutral –Evidence to support this detailed within this EIA <input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Gender <input type="checkbox"/> Marriage & civil partnership </td> <td data-bbox="850 857 1433 1160"> <input type="checkbox"/> Pregnancy & maternity <input type="checkbox"/> Race <input type="checkbox"/> Religion & belief <input type="checkbox"/> Transgender or Transsexual </td> </tr> </table> <p>If you consider that the impact is Equality Neutral then go to question 1h .Otherwise go to question 1e-</p>	<input checked="" type="checkbox"/> Equality neutral –Evidence to support this detailed within this EIA <input type="checkbox"/> Age <input type="checkbox"/> Disability <input type="checkbox"/> Gender <input type="checkbox"/> Marriage & civil partnership	<input type="checkbox"/> Pregnancy & maternity <input type="checkbox"/> Race <input type="checkbox"/> Religion & belief <input type="checkbox"/> Transgender or Transsexual
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1e	<p>What are the negative impacts associated with this function? Please list and give details then go to question 1f</p> <p>The negative impacts associated with the proposal to withdraw the Town Centre Management Service as part of the re-organisation of this service are listed below</p> <ul style="list-style-type: none"> • One of the two posts holders within the TCM team of two whose roles will no longer be required will be at risk of redundancy. • There will no longer be any dedicated Council Officer time or funding to deliver a number of town centre initiatives or projects. 		
1f	<p>Are there positive impacts associated with this function? If yes, please list and give details.</p> <p>The positive impacts associated with the re-organisation of the Town Centre Management function and the re-focusing of remaining resources towards the programme of developing BIDs across the borough are detailed below</p> <ul style="list-style-type: none"> • Some staff expertise can be retained as a new fixed term post to establish the BID will be created and ring fenced to the two Town Centre Managers • A BID Manager post has been advertised by the new Bromley BID and will be appointed from March 2016. This enhances the career opportunities available to the two staff at risk of redundancy • Establishing a BID in a locality can lever in far in excess of the resources which would be accessible from Council funded Town Centre Management arrangements and can increase footfall and increase customer spend • The new Bromley BID and the other proposed BIDs will offer services required by local businesses e.g. Christmas lights, special events, improved safety initiatives 		

1g	<p>At this stage, what plans could be built in to address any negative impacts, and/or to add measures which promote a positive impact, or could you consider an alternative approach which may better achieve the promotion of equality?</p> <p>This review is being considered due to financial constraints so no alternative approach is under consideration. Given the already limited and reducing level of Council funding available for non-statutory services, the proposal is that the limited remaining TCM resource (one post) within the TCM team will be re-focussed away from the day to day management of the remaining town centres towards managing the development and roll out of BIDs across the borough – starting in Beckenham and Penge, but also taking in other areas where there is a demonstrable interest from local businesses and other stakeholders</p> <p>The following actions have been built in to address the possible negative impacts which were identified in section 1e</p> <p>Staff at risk of redundancy</p> <ul style="list-style-type: none"> • Two staff are at risk of redundancy as a result of this proposal. One 2 year fixed term post has been created which is ring fenced to these two staff, limiting the risk of redundancy to one member of staff if a redeployment opportunity cannot be found. • Additionally a BID manager post has been advertised which both staff can apply for if they wish to reducing the risk of redundancy though TUPE regulations do not apply so this will result in an external application process . • Staff to be signposted towards training and assistance with interview preparation <p>Continued provision of activities and events for local businesses</p> <ul style="list-style-type: none"> • Although the services to businesses will be subject to change, the new Bromley BID, once established, will offer services required by local businesses which they were given the opportunity to highlight during recent Bromley BID consultation and which form the basis of the business plan for the BID. For town centres where BIDs are yet to be established, businesses will be fully consulted regarding the services to be provided by any future BID. • Statistics provided by the British BIDS survey 2014 (a professional organisation supporting BIDs) show there over 200 established around the country which is increasing rapidly. The last count of London BIDS totalled 30. (GLA) Some advantages are detailed above in section 1f positive impacts. Other proven advantages cited by successful BIDs which would benefit Penge and Beckenham Town Centres include increased footfall, improved staff retention, improved competitiveness against other locations and improvements to physical surroundings and is fair to small businesses
1h	<p>The Council has a responsibility to promote positive attitudes to equal opportunities in public life. Has this responsibility been discharged in the application of this function? If yes give examples.</p> <p>The proposal supports the responsibility of the council to promote positive attitudes to equal opportunities in public life. Examples of how this has been discharged are detailed below</p> <p>The process of developing a BID involves extensive consultation with businesses to establish what improvements they want and may be prepared to pay for. A BID Proposal is then produced and a 28 day postal ballot is held where businesses vote for or against the proposed programme</p> <p>For a BID to go ahead two conditions must be met. A majority of those voting have to vote yes and secondly those voting yes have to represent more than 50% of the total rateable value of all votes cast. This process ensures the interests of both large and small businesses are protected to promote equality. The Bromley BID had a majority of 85.8% by number, and 90.4% by rateable value. This indicates that there are no equality based impact from the introduction of the Bromley BID as those affected by the changes to the Town Centre Management had the opportunity to vote no in the ballot. Before BIDs are formed in further Town Centres across the borough, the same procedures will be followed</p>

	<p>as the formation of a BID is not an enforced decision but a democratic process determined by ballot.</p> <p>In terms of the Levy to be paid the following concessions apply, charitable organisations that are subject to relief on their business rates liability will pay 75% of the levy that would otherwise apply. Only properties or hereditaments with a rateable value of £15,000 or more will be eligible for payment of the levy to ensure they are not disadvantaged. These levy rules apply to the Bromley BID – but may be different where BIDs are formed in other locations.</p> <p>The existing TCM Team do not currently offer targeted services aimed at the equalities groups. The establishment of BIDs will improve facilities for all members of the public using Bromley, Beckenham and Penge Town centres including the equalities groups</p> <p>The Council has a policy of avoiding compulsory redundancies wherever possible and all efforts will be made to find redeployment for post holders at risk. Employees will have an opportunity to apply for voluntary redundancy, or in the case of employees who are 55 or over and have an occupational pension, early or flexible retirement. These requests will be considered in line with Council policy.</p>
1i	<p>Are there any Human Rights Issues? If so what are they? No, this proposal does not interfere with human rights</p>
1j	<p>Is a full impact assessment required? <input checked="" type="checkbox"/> YES – If you have established that there may not be equality of opportunity in 1c or assessed that there would be negative impact on an equality group in 1 d go to Stage 2 <input type="checkbox"/> NO - please sign off the process (stage 3) and fill in any actions identified, if any in the action plan. <input type="checkbox"/> Don't know. i.e. not enough evidence. Please go to stage 2.</p>
<p>Stage 2 – full impact assessment</p>	
2a	<p>Does the function affect or impact on the public, whether directly or indirectly? <input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> Don't know</p>
	<p>Provide any relevant information here.</p> <p>Indirect impact-This proposal will indirectly impact on the 430 businesses within the smaller town centres who are not beneficiaries of the current TCM Service .This equates to 28% of the overall total of 1530 businesses which are located in both smaller and larger town centres in the borough</p> <p>Direct impact-There are 1100 businesses in the 4 larger town Centres. However only those businesses in Beckenham and Penge who are currently the main clients of the TCM Service will be directly affected by this proposal. There are currently 350 ground floor businesses (i.e with shop frontage) in Beckenham and Penge which equates to 31% of the larger town centre total of businesses.</p> <p>BIDS are of great benefit to large and small businesses alike. The fact that in the UK for a BID to go through, the ballot must be won on two counts by both a straight majority and also a majority of rateable value ensures that the interests of both large and small businesses are protected .There is no data available relating to the number of small businesses located in Beckenham or Penge Town Centre or to the equalities characteristics of the businesses and their employees. The existing TCM Team supports all businesses in these areas and do not work specifically with any targeted groups from equalities groups within the Beckenham and Penge areas.</p>
2b	<p>Have complaints or feedback been received about the function and its effect on different equality groups? <input type="checkbox"/> yes <input checked="" type="checkbox"/> no <input type="checkbox"/> Don't know</p>

	Provide evidence by documenting all reliable up to date information. No complaints or feedback has been received about this function
2c	Outsourced services - if the function is provided by external organisations/agencies on behalf of the Council please detail any arrangements you have to ensure that the function promotes equality; this may include contract conditions.
	Provide evidence by documenting all reliable up to date information. n/a
2	Does the function have employment implications for Council staff <input checked="" type="checkbox"/> yes <input type="checkbox"/> no <input type="checkbox"/> Don't know Provide evidence by documenting all reliable up to date information. <p>The proposal does have employment implications for the two FTE staff currently employed as Town Centre Managers as their current roles are no longer required and therefore the two staff in post will be at risk of redundancy, although one fixed term two year post is being created which is ring fenced only one will be successfully appointed .Additionally the post of BID Manager has been advertised and it is expected that this appointment will be made and the post holder in place by early March. Both Town Centre Managers have the opportunity to apply for this external post and demonstrate that they have the appropriate skills and knowledge to succeed at the selection process . TUPE regulations do not apply to this post as the BID Manager will be employed by Bromley BID Ltd not Bromley Council and there is no contractual arrangement between the Council and Bromley BID Ltd for the provision of services. If one member of staff at risk of redundancy is successfully appointed to the fixed term post and the other to the BID manager post, or redeployed to another suitable alternative post with the Council, then there will be no employment implications resulting from this as no redundancies will be made</p> <p>Both Individual and staff meetings will be arranged for staff directly affected by these proposals. Additional meetings can also be arranged at the request of staff with their line manager/Human Resources. Meetings with trade unions and departmental representatives will also be offered as the process progresses. The staff affected will be dealt with in accordance with the Council's Managing Change protocols .These proposals will impact on individual members of staff differently. If staff wish to discuss the proposals they should contact their line manager directly</p>
2e	If you have established that the function does have an adverse impact on one or more of the groups, then you must identify whether this is justifiable. If not, then the function must be changed. Please set out the adverse impact and the business justification for continuing with this situation. <p>The function has been identified as equality neutral as it will have no adverse impacts on the public or on the businesses based in TCM managed towns or in larger or smaller town centres in the Borough as the information contained within this EIA and highlighted in 2a shows .The practical impact for the 350 businesses in Beckenham and Penge Town Centres is that the Council will no longer provide officer time or funding to deliver town centre initiatives. As these functions will be provided by BIDs. However the proposed new BID Project Officer post will, as part of the BID establishment remit, retain responsibility for liaison with businesses and local stakeholders (which may involve attendance at stakeholder meetings) and will also continue to offer signposting and advice to local groups requiring support for their town centre initiatives. In additional, as part of the wider Growth Agenda the post holder may also be expected to facilitate some business support initiatives – engaging with businesses across the borough, not just in town centres.</p> <p>The existing TCM Team do not currently offer targeted services aimed at the equalities groups. The establishment of BIDs will improve facilities for both large and small businesses and for all members of the public using Bromley, Beckenham and Penge Town centres including the equalities groups</p>

	<p>The justification for this service change is that the Council is in the midst of a period of profound change which is driven in the main by the need to find significant financial savings. In this context the Council has to review all services, particularly those which are non-statutory such as the Town Centre Management (TCM) service. Since 2011 it has been the policy of the Council to encourage the formation of Business Improvement Districts (BIDs), especially within town centres and this approach has been endorsed by Members, Furthermore, in January 2015 Executive agreed a range of savings to be achieved by the end of 2015/16, which included efficiency savings within the Town Centre Management & Business Support team .This underpins the decision to withdraw the TCM Service and refocus remaining resources towards developing further BIDs.</p>			
2f	<p>Monitoring – give details of any monitoring being carried out on existing functions.</p> <p>The following monitoring is carried out on existing functions</p> <ul style="list-style-type: none"> • Footfall data for Bromley, Beckenham and Orpington • Information on vacant Units • Attendance figures at special events and in some cases feedback surveys from participants 			
2f (i)	<p>If this is a new function, or not currently monitored, are you planning to monitor the impact of the function</p> <table border="1" data-bbox="204 808 1433 882"> <tr> <td data-bbox="204 808 612 882"><input checked="" type="checkbox"/> yes</td> <td data-bbox="612 808 1023 882"><input type="checkbox"/> no</td> <td data-bbox="1023 808 1433 882"><input type="checkbox"/> Don't know</td> </tr> </table> <p>If yes add details to action plan If no please explain why it is not considered appropriate to do so. See action plan for details</p>	<input checked="" type="checkbox"/> yes	<input type="checkbox"/> no	<input type="checkbox"/> Don't know
<input checked="" type="checkbox"/> yes	<input type="checkbox"/> no	<input type="checkbox"/> Don't know		
2g	<p>Consultation – If you have not carried out consultation, or if you need to carry out further consultation who will you be consulting with and by what methods?</p> <p>Add details to action plan</p> <p>A consultation process is underway in order to formally consult with the staff directly affected by these proposals from the equalities groups identified, and also to communicate with all staff that will be indirectly affected by the proposed changes. In line with the Council's procedures for managing organisational change, a copy of the proposal is also being sent to the Trade Unions and Departmental Representatives as part of the formal consultation process, which will last for a period of 30 calendar days from the date of this document. Feedback from the staff consultation will be provided to Members at the January PDS Committee and should be submitted by 5pm on January 19th 2016,</p> <p>The consultation has been extended to include ward Councillors and all relevant Town Centre and residents organisations The purpose of this consultation is to make them aware of the proposed changes. The Comments regarding to the proposals should be submitted by Friday 8th January. An e mail was sent to Councillors in the borough and to the Chairs of the relevant groups including</p> <ul style="list-style-type: none"> • Beckenham Business Association • Beckenham Society • Beckenham Churches Together • Beckenham Town Centre Team • Bromley North Village Team • Bromley Safer Neighbourhood team • Central Beckenham Residents Association • Chislehurst Society • Copers Cope Residents Association • Penge Forum/Penge Town Centre Team • Penge Partners • Safer Neighbourhood Team Penge • Safer Neighbourhood Team Beckenham • WBRA 			

	<ul style="list-style-type: none"> West Wickham Traders Association <p>The Head of Town Centre Management and Business Support has also attended meetings of the Town Centre Teams in both Beckenham and Penge to explain the proposed changes.</p>
2h	<p>Evidence- What further evidence do you have about considerations with regard to equality issues that you have made concerning this function? e.g. audit reports, minutes from meetings or survey results</p> <p>The following evidence relates to considerations with regard to equality issues which have been made concerning this function</p> <p>Building a Better Bromley-The success and vitality of the Borough's town centres remains one of the Building a Better Bromley priorities</p> <p>Bromley BID Ballot- The Bromley town centre BID ballot ran from 9th October-5th November 2015.The total number of votes cast was 183 representing a turnout of 33%. In total 85.8% voted in favour representing 90.4% of the rateable value of votes cast</p> <p>Feasibility Study-The ballot took place after an 18 month long process involving a full feasibility study and full consultation with businesses who will be members of the BID</p> <p>Bromley BID Final Consultation Report- Since 2014 the London Borough of Bromley in conjunction with a partnership of town centre businesses created Your Bromley and has been researching if a BID would be of Value in Bromley and what it should deliver. Extensive research and consultation has been carried out in Bromley including contact with 641 businesses in Bromley before the ballot stage.</p> <p>Bromley BID Business Plan and Core Strategies- A business plan has been created outlining what the BID will deliver focussing on the following four core areas of delivery</p> <ul style="list-style-type: none"> Your Bromley made Smarter-improvements being made to the urban environment to enhance the appearance of the town centre including additional cleansing, planting improved signage Your Bromley made Prominent-To drive footfall, provide businesses with the platforms to get involved and widen Bromley's appeal. This will include a calendar of events and various promotional campaigns Your Bromley made Safer-Initiatives to tackle community safety and improve perceptions about Crime and anti-social behaviour. This will include a team of street ambassadors introducing a child safe scheme and crime reduction initiatives Your Bromley made for Business-Supporting businesses in the office sector to improve the business scene through information sharing, networking events.
2i	<p>Publishing – if the equality impact assessment forms part of an overall review then the results should be published as part of any report that goes forward to Elected Members. If not the findings of the impact assessment should be published on our Council's web site.</p> <p>See action plan for details</p>
2j	<p>Training and development - please list any staff training issues that have arisen as a result of conducting the impact assessment</p> <p>See action plan for details</p>

Stage 3 - EQUALITY IMPACT ASSESSMENT ACTION PLAN please list actions that you plan to take as a result of this assessment, continuing on a separate sheet if necessary. If appropriate these actions should be added to any business/service plan for the function.

Issue	Action to be undertaken	Desired outcome	Action owner	Target date
Consultation	Feedback from consultation to be provided to Members at January PDS	Members have sufficient information relating to the outcome of the consultation to make an informed judgement	Martin Pinnell	January 2016
Monitoring	For the following to be collected and monitored <ul style="list-style-type: none"> • Footfall data • Events attendance figures • Vacant units data • Any other relevant monitoring information 	So that comparable data and information is available in order to monitor satisfaction and benchmark the service	Martin Pinnell	quarterly and ongoing
Staff training and development	For both staff at risk of redundancy to receive /be signposted towards training which will enhance their suitability for alternative employment	That staff feel well prepared and confident in a competitive interview situation	Martin Pinnell	ongoing
Publication of EIA	EIA to be published ahead of January PDS meeting so that it can be accessed by Members, staff, and the public.	That members are fully informed of the impact of the proposals before the January PDS	Paula Young	January 2016

Signed: Paula Young
Date: January 2016