

EQUALITY ANALYSIS - Appendix 2 – Part A

This Equality Analysis considers the effect of Bury Council/ Bury CCG activity on different groups protected from discrimination under the Equality Act 2010. This is to consider if there are any unintended consequences for some groups from key changes made by a public body and their contractor partners organisations and to consider if the activity will be fully effective for all protected groups. It involves using equality information and the results of engagement with protected groups and others, to manage risk and to understand the actual or potential effect of activity, including any adverse impacts on those affected by the change under consideration.

For support with completing this Equality Analysis please contact corporate.core@bury.gov.uk / 0161 253 6592

SECTION 1 – RESPONSIBILITY AND ACCOUNTABILITY	
Refer to Equality Analysis guidance page 4	
1.1 Name of policy/ project/ decision	Bury Market Flexi Hall
1.2 Lead for policy/ project/ decision	Richard Spensley
1.3 Committee/Board signing off policy/ project/ decision	Regeneration Board and Cabinet
1.4 Author of Equality Analysis	<i>Name: Richard Spensley /Molly Sandford-Ward Role: Major Projects Manager/Graduate Regeneration Officer Contact details: r.spensley@bury.gov.uk/m.sandfordward@bury.gov.uk</i>
1.5 Date EA completed	12/10/2022
1.6 Quality Assurance	<i>Name: Adiba Charlesworth Role: Equality, Diversity & Inclusion Manager Contact details: a.charlesworth@bury.gov.uk Comments:</i>
1.7 Date QA completed	? TBC
1.8 Departmental recording	<i>Reference: Date:</i>
1.9 Next review date	<i>RIBA Stage 4 (currently anticipated circa March 2023)</i>

SECTION 2 – AIMS AND OUTCOMES OF POLICY / PROJECT	
Refer to Equality Analysis guidance page 5	
2.1 Detail of policy/ decision being sought	Bury Market is a significant provider of employment and is currently particularly well-used by women and older people, people from lower social grades and those living in deprived neighbourhoods and elderly pensioners living alone. Despite this Bury Market has multiple challenges that it must overcome to continue operating successfully and to realise its full potential, such as poor-quality townscape, dated infrastructure, and an aging consumer base. Project proposals include improved public realm and a variety of flexible spaces, which will support enterprise and entrepreneurship, working with educational institutions, enhance the town’s cultural offer including an extended events programme, recreation, and hospitality, working with new and established small local businesses in these sectors. The Flexi Hall is part of one of Bury’s two Government approved levelling up schemes (but does not constitute the whole scheme as this also encompasses fabric improvements to Bury Market).

2.2 What are the intended outcomes of this?	The project will enhance the vitally important Market, considered a crucial social function for residents of all groups, particularly elderly residents. The Market is an area to meet and socialise, within one of the most deprived parts of the borough and country. It is intended that these proposals will help maintain and enhance these services which are well used by multiple priority groups. The scheme intends to meet the Levelling Up themes of regeneration of the town centre and cultural enhancement.
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SECTION 3 – ESTABLISHING RELEVANCE TO EQUALITY & HUMAN RIGHTS		
Refer to Equality Analysis guidance pages 5-8 and 11		
Please outline the relevance of the activity/ policy to the Public Sector Equality Duty		
General Public Sector Equality Duties	Relevance (Yes/No)	Rationale behind relevance decision
3.1 To eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by Equality Act 2010	Y	The Bury Market Flexi Hall scheme will be an inclusive space that aims to be open and accessible to all.
3.2 To advance equality of opportunity between people who share a protected characteristic and those who do not.	Y	The scheme aims to support the inclusion of those who share any of Bury Council's recognized protected characteristics. In particular, as a Levelling Up scheme, it aims to support those who are socio-economically disadvantaged and to promote opportunity celebrating Bury's cultural diversity. Based on the data regarding the most common users of Bury Market at present, it also aims to respond to the needs of older members of the community and those with health conditions and disabilities.
3.3 To foster good relations between people who share a protected characteristic and those who do not	Y	The design philosophy that underpins the Flexi Hall scheme aims to provide inclusive spaces for the benefit of all including those groups / individuals who possess protected characteristics. We aim to make this implicit, rather than explicit, in the layout and design of spaces. In this regard, these spaces (whether they are internal or external) should be natural to use and not draw unnecessary attention or single out users possessing any protected characteristics.
3.4 Please outline the considerations taken, including any mitigations, to ensure activity is not detrimental to the Human Rights of any individual affected by the decision being sought.		
Respect for the rights of individuals or groups is fundamental to their quality of life and underpins the basic human right that people should be treated with dignity and respect at all times. The design of the Flexi Hall (currently at RIBA Stage 3) has therefore been developed in a manner that aims to respond as best as possible to the needs and requirements of its future end users, including Bury's diverse communities and the groups and individuals within these who possess		

protected characteristics. This design approach, including proactive and effective engagement and communication with stakeholders, will continue as the design of the Flexi Hall evolves and develops further as the scheme progresses into the next phase of its development (RIBA Stage 4 – detailed design). The needs of all will be considered as part of this.

SECTION 4 – EQUALITIES DATA			
Refer to Equality Analysis guidance page 8			
Protected characteristic	Outcome sought	Base data	Data gaps (to include in Section 8 log)
4.1 Age	The Market is currently well-used by elderly residents and older people living alone. This project aims to ensure the viability and vitality of the Market is maintained so that it can continue to serve its users. It is intended that both the proposed public realm enhancements and the internal spaces within the Flexi Hall will make it more accessible and convenient to older people, whilst encouraging increased dwell time and enhancing opportunities for community cohesion. This will be further embedded through the delivery of event programmes within the Flexi Hall aimed at elderly residents and older people living alone. We also hope to provide more services / programmes within the Flexi Hall for young people, who do not currently use the Market as much.	The Council is continually collecting and monitoring the views of Market traders, residents, other visitors to the Market and businesses, including via the Market Operations team, project specific activities building on earlier engagement undertaken through the Markets Task Force group. This cumulative and collated feedback directly shaped the development of the successful application for Leveling Up funding from the UKG and shaping the project, providing robust evidence of need for further modernisation and future proofing of the existing Market facility and the regeneration of its wider area: to deliver lasting socio-economic and other associated benefits and outcomes for the diverse communities across Bury. The identification and collation of baseline data is continuing to ensure the project remains aligned with achieving national as well as corporate policy objectives, especially Bury's 2030 Community	We have a number of gaps in our knowledge of Bury's demographic, socio economic data (in terms of identifying accurate baseline information and forecast target data that fully aligns with achieving both national and importantly local / corporate policy priorities). We are looking into finding out more about this to inform project and operational decisions, and are seeking further guidance and direction from senior officers at Bury Council.
4.2 Disability	The public realm around the Market is to be improved which will make the market more accessible, safer, convenient and legible for all users, including disabled users. The		

	<p>design and layout of internal spaces and facilities (including 1st floor lift access, Changing Places and DDA compliant WCs) have also been designed with disabled groups / individuals in mind. Wayfinding and signage will be improved with a view to accommodating disability needs (including individuals who have dyslexia, visual impairment). Health and community programming in the Flexi Hall could also be tailored to support opportunity for disabled people as well as other groups.</p>	<p>Strategy and Corporate Plan.</p> <p>Examples of this include:</p> <ul style="list-style-type: none"> • Bury Market Research Report, User / Trader results – A market research report identified that both users and traders considered Bury Market a success however, there were areas for improvement including better promotion, linkages, additional offering, and weather protection. 	
<p>4.3 Gender</p>	<p>The Market is particularly well-used by women. This project aims to ensure the viability and vitality of the Market is maintained and future proofed so that it can continue to serve its existing users whilst providing new opportunities encouraging other groups and individuals who may not currently use the Market.</p>	<ul style="list-style-type: none"> • Visitor / Coach trip data survey analysis – Coach trips have been vital to Bury Market's success, hence why proposals retain much of the offering but instead upgrades the buildings. These plans align with recent survey data, which demonstrated 0.5% of respondents considered the products and shopping experience 'acceptable' or 'poor', whilst 11.4% of the respondents considered the facilities 'acceptable' or 'poor'. The survey data demonstrated the lack of youthful visitors, with only 12% of visitors aged 45 or under. 	
<p>4.4 Pregnancy or Maternity</p>	<p>The health and community programming in the Flexi Hall may support those who are pregnant or are postpartum. We will review this at the next EqIA review (RIBA 4 stage). We will consider how the project can best support those who are breastfeeding or need baby change facilities (the designs currently provide baby changing facilities).</p>		

4.5 Race	The scheme doesn't discriminate and has been developed to be open and inclusive to all, including supporting the continued use of the Market by BAME users. We will also investigate the potential for promoting the Flexi Hall venue for Asian weddings (amongst others).	<ul style="list-style-type: none"> • Civic venue public consultation – Feedback from a review of Bury's civic venues identified issues relating to current provision compared to their need, with a recognised deficiency in flexible spaces for events and groups. 	
4.6 Religion and belief	The Flexi Hall is designed to be flexible and adaptable for its users and open and inclusive to all. For example, the operational planning of the building could help provide opportunity for quiet contemplation and prayer space.	<ul style="list-style-type: none"> • Businesses / resident engagement – Email correspondence with businesses throughout Covid-19 highlighted a need for digital skills improvements for businesses and adults, as well as an improved awareness of the importance of leisure and healthy eating from residents. 	
4.7 Sexual Orientation	The Flexi Hall is designed to be flexible and adaptable for its users and open and inclusive to all.		
4.8 Marriage or Civil Partnership	The Flexi Hall is designed to be flexible and adaptable for its users and open and inclusive to all. We will also investigate the potential for promoting the Flexi Hall venue for weddings including civil partnership ceremonies.	Additionally, Bury College have voiced their support for proposals, particularly in creating collaborative opportunities at the demonstration and incubator space within the Flexi-hall for students and businesses alike.	
4.9 Gender Reassignment	The health and community programming in the Flexi Hall has the potential to provide programmes targeted to particular groups, including those who are impacted by the personal process of gender reassignment. The design of spaces within the Flexi Hall (including the provision	Enhancing these synergies is crucial for maximising the success of the investment. This research relates to issues across the protected characteristics.	

	of self-contained WC's) also reflects an ongoing consideration of gender recognition.		
4.10 Carers	The health and community programming in the Flexi Hall has the potential to provide programmes targeted to particular groups, including Carers.		
4.11 Looked After Children and Care Leavers	The health and community programming in the Flexi Hall has the potential to provide programmes targeted to particular groups, including looked after children and care leavers.		
4.12 Armed Forces personnel including veterans	The health and community programming in the Flexi Hall has the potential to provide programmes targeted to particular groups, including members of the armed forces reflecting amongst other aspects, Bury's strong historical links to the armed services.		
4.13 Socio-economically vulnerable	Bury is ranked in the top 10% most deprived parts of the country. Bury Market is a significant provider of employment and is particularly well-used by people from lower social grades and living in deprived neighbourhoods, including elderly people and those living alone. This project aims to ensure the Market is maintained and is sustainable over the long term so that it can continue to serve its traders and users as well as providing a		

	location for bringing people together and fostering stronger social cohesion. It also aims to deliver greater floorspace, therefore generating additional FTE jobs that will benefit the local workforce, local businesses and its local supply chains.		
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SECTION 5 – STAKEHOLDERS AND ENGAGEMENT

Refer to Equality Analysis guidance page 8 and 9

	Internal Stakeholders	External Stakeholders
5.1 Identify stakeholders	The organization that wins the tender to operate and manage the Flexi Hall (TBD, procurement exercise underway); councilors, equality groups within council (look into this), Council Transformation, Wellness, Culture, Economic Development, Public Health, Adult and Children’s services (for programs)	Market traders; market users; Bury residents; those who work in Bury centre; local community groups; third sector organizations (delivering programs)
5.2 Engagement undertaken	Markets Operations, Parking Service, Property Services, Planning, Councilors	Market traders (meetings), markets task force, will be more in future, public consultations in future
5.3 Outcomes of engagement	Broad consensus for scheme, operational discussions to continue including preferred approach to the operation and management of the Flexi Hall and ensuring the project outcomes are fully aligned with Corporate policy objectives	Broad consensus for scheme, suggestions made for specific features, further engagement to continue
5.4 Outstanding actions following engagement (include in Section 8 log)	To continue to involve these groups in the Flexi Hall design development and associated events and community programmes, to secure a fit for purpose model for operating and managing the facility.	To engage further with external stakeholders to ensure we’re responding to the needs of Bury’s diverse communities.

SECTION 6 – CONCLUSION OF IMPACT

Refer to Equality Analysis guidance page 9

Please outline whether the activity/ policy has a positive or negative effect on any groups of people with protected inclusion characteristics

Protected Characteristic	Positive/ Neutral Negative/	Impact (include reference to data/ engagement)
6.1 Age	Risks/opp ortunities	Opportunities: As the Market is well used by older people, there are opportunities to create positive enhancements to internal and external environments for older people, as well

		<p>as developing targeted programmes including health and wellbeing events / activities provided in the Flexi Hall and as a meeting place (improving dwell time, safer, more accessible and convenient spaces encouraging greater social cohesion). We need to ensure that people 55+ continue to feel comfortable in the new Flexi Hall by providing spaces and events open and welcoming to them. Young people currently do not use the Market as much as other groups. The Flexi-hall will aim to deliver improved leisure and cultural facilities for younger people as well. Improved linkages to Bury College and better design of the public realm and built form should also make the Market and Flexi hall spaces more attractive and welcoming to young people.</p>
<p>6.2 Disability</p>	<p>Risks/opp ortunities</p>	<p>Opportunities: There are many opportunities within this project to make the market and surrounding public realm more accessible, safer and convenient to people with disabilities. There are also risks involved if the structural and interior design does not take the needs of disabled people adequately into account. Currently, the project aims to make the public realm and internal spaces more accessible, navigable and understanding to physically disabled people and more legible for those with SEN, dementia and neurodivergence for example. Wayfinding will be improved and a CPT will be included in the Flexi Hall to support those with complex needs. The health and community programme that is to be planned to be delivered from the Flexi Hall should also have a positive impact for disabled and chronically ill users.</p> <p>Risks/things to consider: We will consider coloured, pictorial and braille signage/wayfinding for those with dyslexia and visual impairment. No specified safe space – we will investigate how this can be mitigated operationally as we move into the RIBA 4 detailed design stage.</p>
<p>6.3 Gender</p>	<p>Risks/opp ortunities</p>	<p>Opportunities: As women are key users of the space, we need to continue to ensure that the Flexi Hall design fosters a welcoming space for them. Equally, there should be opportunities for men to be fully involved in the space's programming.</p> <p>Risks/things to consider: The needs of women and the needs of those who have undergone gender reassignment or are impacted by the 'personal process' associated with gender re-assignment, should continue to be consider. Recent examples include the expanded provision of self-contained W/Cs. We will continue to recognize the potential conflicts in balancing the needs of these and other groups.</p> <p>The provision of sanitary products will be considered at an operational level Baby changing facilities have been designed e in both male and female W/Cs.</p>

6.4 Pregnancy or Maternity	Risks/opp ortunities	<p>Opportunities: The health and wellbeing programming may be able to support specific groups, such as those who are pregnant or post-partum.</p> <p>Risks/things to consider: No specified breastfeeding space – we can look into this operationally. Baby changing facilities are available in both female and male spaces.</p>
6.5 Race	Risks/opp ortunities	<p>Opportunities: The Flexi Hall will be a space which is open to and inclusive of all.</p> <p>Things to consider: We should consider whether any programming can be targeted as ethnic minorities/refugees (and whether there is a need for this). We should consider wayfinding and signage (easy, clear English for those whose first language isn't English).</p>
6.6 Religion and belief	Risks/opp ortunities	<p>Opportunities: The Flexi Hall will be a space which is open to and inclusive of all. If the Hall were to be licensed as a wedding venue, all faiths of weddings would be welcome.</p> <p>Risks/things to consider: We acknowledge that, in terms of toilet provision, there may be a conflict between the needs of some religious groups and the needs of those who have undergone gender reassignment. We are providing single occupancy toilets as well as male and female WCs. There is currently no specific space for use as a prayer / contemplation room – we will investigate how this can be mitigated operationally as we move into RIBA 4.</p>
6.7 Sexual Orientation	Risks/opp ortunities	<p>Opportunities: The Flexi Hall will be a space which is open to and inclusive of all, regardless of sexual orientation. If the venue is licensed for weddings, it would welcome LGBT+ weddings. The health and wellbeing programming may be able to provide services for specific groups.</p>
6.8 Marriage or Civil Partnership	Risks/opp ortunities	<p>Opportunities: We are looking into the possibility of the space being available as a wedding/civil partnership venue.</p>
6.9 Gender Reassignment	Risks/opp ortunities	<p>Opportunities: The Flexi Hall will be a space which is open to and inclusive of all, regardless of gender identity. The health and wellbeing programming may be able to provide services for specific groups.</p> <p>Risks/things to consider: The needs of women and the needs of those who have undergone gender reassignment or are impacted by the 'personal process' associated with gender re-assignment, should continue to be consider. Recent examples include the expanded provision of self-contained W/Cs. We will continue to recognize the potential conflicts in balancing the needs of these and other groups. To make the space further welcoming to trans people / gender recognition, we will investigate the provision of sanitary bins in the male toilets.</p>

6.10 Carers	Risks/opp ortunities	The Flexi Hall will be a space which is open to and inclusive of all. The health and wellbeing programming may be able to provide services for specific groups.
6.11 Looked After Children and Care Leavers	Risks/opp ortunities	The Flexi Hall will be a space which is open to and inclusive of all. The health and wellbeing programming may be able to provide services for specific groups.
6.12 Armed Forces personnel including veterans	Risks/opp ortunities	Bury is proud of its history with the armed forces and its veterans. The Flexi Hall will be a space which is open to and inclusive of all. The health and wellbeing programming may be able to provide services for specific groups.
6.13 Socio-economically vulnerable	Risks/opp ortunities	<p>The town contains pockets of serious deprivation and experiences well-documented issues of falling footfall and increasing vacancies. Town centre regeneration is needed to level up key communities that rely on the Market offer. The Levelling Up funding is targeted at alleviating socio-economic deprivation.</p> <p>The Flexi Hall and Market project will provide safe, welcoming convenient spaces for Bury's diverse communities (which in turn will help create new opportunities encouraging people to spend money in Bury's wider local economy). The scheme will help future proof the Market encouraging the future provision of additional jobs both within the Market, new Flexi Hall and wider area.</p>
6.14 Overall impact - What will the likely overall effect of your activity be on equality, including consideration on intersectionality?	We believe that, overall, the Flexi Hall has the potential to be a flagship scheme in terms of providing new opportunities for equality, diversity and inclusivity.	

SECTION 7 – ACTION LOG

Refer to Equality Analysis guidance page 10

Action Identified	Lead	Due Date	Comments and Sign off (when complete)
7.1 Actions to address gaps identified in section 4			
Gaps in demographic data	Molly	November 2022	Discussions will continue with Council internal stakeholders to better identify robust baseline data sources and targets that are fully aligned with national and especially local corporate policy objectives.
7.2 Actions to address gaps identified in section 5			
Continue and expand engagement with external stakeholders	Regen Team	Ongoing	
Continue and expand engagement with internal stakeholders	Regen Team	Ongoing	This includes creating a plan for health and wellbeing programming (see also previous comment about ensuring

			continued alignment with local / corporate policy)
7.3 Mitigations to address negative impacts identified in section 6			
Look into clear signage and way finding (for those with disabilities or ESL)	Regen Team	RIBA 4	
Look into operational ways of delivering safe space/breastfeeding space/prayer room	Regen Team	RIBA 4	
Look at providing sanitary products in women's and men's toilets	Regen Team	RIBA 4	
Check that we are providing baby changing facilities in women's and men's toilets	Regen Team	RIBA 4	
Finalize toilet provision plans (in terms of male, female, disabled and gender neutral options)	Regen Team	RIBA 4	
7.4 Opportunities to further inclusion (equality, diversity and human rights) including to advance opportunities and engagements across protected characteristics			
Included in section 6			

SECTION 8 - REVIEW			
Refer to Equality Analysis guidance page 10			
Review Milestone	Lead	Due Date	Comments (and sign off when complete)

Please make sure that every section of the Equality Analysis has been fully completed. The author of the EA should then seek Quality Assurance sign off and departmental recording.

SECTION 9 – QUALITY ASSURANCE		
Refer to Equality Analysis guidance page x		
Consideration	Yes/ No	Rationale and details of further actions required
Have all section been completed fully?		
Has the duty to eliminate unlawful discrimination, harassment, victimization and other conducted prohibited by the PSED and Equalities Act been considered and acted upon?		

Has the duty to advance equality of opportunity between people who share a protected characteristic and those who do not been considered and acted upon		
Has the duty to foster good relations between people who share a protected characteristic and those who do not, been consider and acted upon		
Has the action log fully detailed any required activity to address gaps in data, insight and/or engagement in relation to inclusion impact?		
Have clear and robust reviewing arrangements been set out?		
Are there any further comments to be made in relation to this EA		