

# **Equality Impact Assessment / Equality Analysis**

(Version 4)

| <b>Item name</b>                                     | <b>Details</b>                             |
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| <b>Title of service or policy</b>                    | Bath Christmas Market 2025                 |
| <b>Name of directorate and service</b>               | Place Directorate – Community & Compliance |
| <b>Name and role of officers completing the EqlA</b> | Tilley Sheridan: Event Operations Manager  |
| <b>Date of assessment</b>                            | 26.09.2025                                 |

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 people and different groups within our community. The main aim is to identify any adverse impacts (i.e. discriminatory or negative consequences for a particular group or sector of the community, and to identify areas where equality can be better promoted). Equality impact Assessments (EqIAs) 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 (EqIA) or Equality Analysis. **Not all sections will be relevant – so mark N/A 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 following relevant service lead approval.

## 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 Bath Christmas market is an annual open access free public event held in the city of Bath between Mid-November and Mid-December (<i>Thursday 27<sup>th</sup> November to Sunday 14<sup>th</sup> December 2025</i>). The event is managed and delivered by the B&amp;NES Event Operations Team, with support from colleagues in statutory services, i.e., Highways, Parking, Licensing. Site and Production support is contracted by B&amp;NES to an external company, Muddy Dog</p> <p>It is a council run event that has been granted full planning consent until January 2027 and is scrutinised as part of the Safety Advisory Group for Events process.</p> <p>The event provides an uplift to the regional economy through, tourism, accommodation, F&amp;B and retail sectors.</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> </ul>  | <p>The event has been operating since 2001, making 2025 the 25<sup>th</sup> Anniversary, although this is the fourth year of operation through Bath and North East Somerset Council, previously the event had been organised by Visit Bath.</p>   |

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| <ul style="list-style-type: none"> <li>• Is it a national requirement?).</li> <li>• How much room for review is there?</li> </ul> | <p>It is not a public service or national requirement.</p> <p>The event is reviewed annually, and a visitor survey is carried out both online and face to face, reports and findings are shared and reviewed with any recommendations taken forward for consideration.</p>  |
| 1.3 Do the aims of this policy link to or conflict with any other policies of the Council?  | The event does not directly conflict with other council policies, and its sustainability statements are reviewed annually, to support the Council's Climate and Ecological Emergency, with both contractors and traders, expected to comply; along with messaging to use sustainable transport options and eco-friendly generators, where absolutely necessary. |

## 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 equality focussed training have staff received to enable them to understand the needs of our diverse community?                              | <p>All public facing contractors, particularly our Security and stewards, are required to undertake or have proof of having undertaken Equalities training, alongside Customer Services training. It is mandatory for all B&amp;NES council officers to undertake Equality and Diversity training.</p> <p>In addition, it is a compulsory requirement that all staff have undertaken ACT training.</p>                 |
| <b>2.2</b> What is the equality profile of service users?  | People who live in, work in and visitors to Bath could access the market. We are unable to accurately identify the equalities profile of all users, however, we anticipate that all protected characteristics will need to be considered.  |
| <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>Yes, the event is reviewed annually, and a visitor survey is carried out both online and face to face, reports and findings are shared and reviewed with any recommendations taken forward for consideration.</p> <p>We made sure that all security and stewarding staff had a card with a scannable QR code with information about accessible parking and toilets. This came out of feedback from visitors who</p> |

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|  | <p>required extra assistance. All our staff were, and will be, briefed to make sure that they assist anyone with any additional help they may need.</p> <p>We will be making sure that information is available on our website, and social media channels about who to speak to at the event if you need any additional assistance.</p> <p>Our visitor survey from 2024 included some questions around accessibility, of which results can be found <a href="#">here</a>. The survey showed us that we need to do more to share information on the accessibility of the event; getting here, places to park etc., and advertise the fact that this information is available more. This is something we aim to do for this year's event.</p> <p>This year we have decided to continue to print site maps of the event, as it was raised that only having a digital copy of the map wasn't accessible to everyone. This proved popular in 2024.</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>No formal consultation or engagement has taken place, but we are constantly reacting to feedback we receive. We hope to incorporate more accessibility questions into our visitors survey for this year's event.</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 equality considerations within this? | <p>Yes. Ongoing annual review with council departments will take place after the event has finished. We will also continue to monitor any feedback we receive before, during, and after the event itself.</p> <p>Feedback after the event has be submitted via a multitude of ways; through council connect, online, in person (this can be arranged in advance if needed), email through our event inbox and via council officers.</p> <p>We provide translation and interpretation services on request.</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 equality groups

| <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 | <p>Physical changes to the event site and infrastructure have been carried out to give access to all members of the public. This includes operating a clear kerb policy and additional temporary kerbs built to enable wheelchair access to all areas. Some Chalets have been modernised with lower counters for access by wheelchair users. There is an ongoing maintenance programme to reduce the heights of all chalet counters within the next three years and to introduce open style chalets that can be accessed from all sides.</p> <p>Public information around visiting the market is on the Bath Christmas Market website. Key messaging is around the best times to visit to avoid busy periods.</p> <p>The website gives information about planning your journey and advises on travel and transport to and from the city.</p> |  |

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|   | <p>Accessible parking facilities will be highlighted and included in the market map that can be downloaded for free, or on our printed version which will be made available on site at the event, or can be posted in advance. We will make sure that all staff have access to these, and that accessible facilities are highlighted via a QR code.</p> <p>After much consideration we came to the conclusion that it was not viable to add changing place facilities to the events footprint, but rather we will highlight where all changing places facilities are located within Bath along with opening times. We will look into ways in which we might be able to keep these spaces open for the full duration of the events opening hours.</p> |   |
| <b>3.2 Sex</b> – identify the impact/potential impact of the policy on women and men. | The event is open and free to all regardless of sex.   | Poor lighting in the city could pose a risk to woman and girls, especially in areas where CCTV does not cover. We aim to make our site as well-lit as possible. |
| <b>3.3 Pregnancy and maternity</b>  | <p>The event is open and free to all members of the public. Additional seating has been introduced for those requiring rest and recuperation, and for those feeding babies and children.</p> <p>Baby changing facilities are available in the accessible toilet units across site.</p>   |   |

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|   | Physical changes to the event site have been carried out. This includes operating a clear dropped kerb policy and adding additional temporary sloped kerbs to enable better access for pushchairs and prams.  |  |
| <b>3.4 Gender reassignment</b> – identify the impact/potential impact of the policy on transgender people   | The event is open and free to all members of the public, regardless of gender. There are no known risks.  | Poor lighting in the city could pose a risk to people at increased risk of hate crime, especially in areas where CCTV does not cover. We aim to make our site as well-lit as possible. |
| <b>3.5 Disability</b> – identify the impact/potential impact of the policy on disabled people (ensure consideration of physical, sensory and mental health needs/differences) | <p>Physical changes to the event site have been carried out to give access to all members of the public. This includes operating a clear dropped kerb policy and additional temporary kerbs built to enable wheelchair access to all areas. Some Chalets have been modernised with lower counters for wheelchair users. Many of the chalets are of a barn door style and can be accessed by both wheelchair users and people with limited mobility.</p> <p>Accessible toilet units are located in two locations within the event footprint, and on our market map we will also highlight the locations for other toilets, including accessible and changing places toilets.</p> <p>Additional stewards are on hand to assist members of the public who may have</p> |  |

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|   | <p>reduced mobility or physical, sensory and/or mental health needs. The 'Mobility Helpers' will be on call to help, guide and assist anyone in need during the events operational period. Market users will be able to identify those who are able to help, as they will be wearing a branded hi-vis jacket.</p> <p>Additional provision for accessible parking is created nearby to the event in Quiet Street, Royal Avenue and Broad Street car park. Wherever possible accessible parking is maintained in the city centre.</p> <p>We are very aware that the event takes place in a world heritage city, with some areas being more cobbled than others making it difficult for prams and individual wheelchairs and mobility aids to get around some areas. In these areas, we have not included any activation of the paved walkways to allow a more accessible route around. This is something we continue to monitor.</p> |   |
| <b>3.6 Age</b> – identify the impact/potential impact of the policy on different age groups | The event is open and free to all members of the public. Midweek visits are promoted to those who may wish to visit during less busy periods.  | <p>Consider the impact on mobility for the elderly.</p> <p>Include this: Additional seating has been introduced (where possible) for those requiring rest and recuperation.</p> |



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|  | <p>The nature of the event gives rise to the possibility of a number of young people on the site; thus a policy for dealing with lost children and other vulnerable persons will be established and communicated to all members of staff:</p> <ol style="list-style-type: none"> <li>1. Any steward or member of staff finding (or being presented with) a lost person or child should immediately contact Event Control (07522 131308) and pass a description of the person, their name, location, and any other relevant information. If a member of production staff makes initial contact, then Event Control shall send a steward to the location.</li> <li>2. Event Control shall alert CCTV control room who will alert the police, and all stewards and site personnel will be informed that a child has been found – in case the parents/guardians present themselves to another member of staff. Recommended timescale 30 minutes prior to contacting police but each case to be assessed on an individual basis according to vulnerability.</li> <li>3. The steward should remain with the child at the initial location for no less than 10 minutes. In all</li> </ol> | <p>Also consider dementia awareness for staff and what support could be available – the same system should be in place as for lost children.</p> |
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|  | <p>likelihood the child will be reunited with their family/carers within this time. Removing the child too quickly can easily escalate an otherwise minor event.</p> <ol style="list-style-type: none"> <li>4. If the child has not been reunited after 10 minutes, Event Control will delegate a DBS checked member of staff to collect the lost child/person who shall then be taken to the Event Control Room. Depending on circumstances a second DBS checked steward may be asked to assist.</li> <li>5. All details of any reported lost child/vulnerable person will be logged.</li> <li>6. Any public announcements will avoid using children's names. Instead, a request will be made for named parents or "anyone who is missing a member of their party to visit Event Control Room.</li> </ol> <p>If a member of the public reports that they have lost a member of their family or group, this information should be immediately conveyed to Event Control. Information that should be gleaned includes name, age, what wearing, height, hair colour, last seen and mobile phone number of parents.</p> |  |
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|  | <p>Event Control will issue a general alert to all stewards and staff to monitor the crowd for the child. Particular attention should be paid to the main entry points (alongside the Abbey and Roman Baths – Kingston Parade, York Street [Bog Island and Stall Street end], Abbeygate Street) to ensure that no unaccompanied minors leave the site.</p> <p>Any child or vulnerable persons still in the facility at the end of the event shall be passed to Avon and Somerset Police</p> <p>A 'Text All' service via Notify, is operated during the event operational phase; this enables the event team to contact and relay messages to all of the stallholders and caterers at the same time with one text message. This gives us the ability to increase the level of surveillance and call for assistance in the event of an incident involving a lost child or vulnerable adult.</p> |  |
| <b>3.7 Race</b> – identify the impact/potential impact on across different ethnic groups | The event is open and free to all members of the public.  | <p>We do not openly offer any translated documents in languages other than English, but this is something we can look at upon request.</p> <p>As above consider safety for people at increased risk of hate crime.</p> |
| <b>3.8 Sexual orientation</b> – identify the impact/potential impact of the policy on    | The event is open and free to all members of the public.  | As above consider safety for people at increased risk of hate crime.   |

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| lesbian, gay, bisexual, heterosexual, questioning people   |   |  |
| <b>3.9 Marriage and civil partnership</b> – does the policy/strategy treat married and civil partnered people equally?   | The event is open and free to all members of the public.  |  |
| <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 Bath Christmas market is open to all people of all religions and faith groups. A service of thanksgiving is held in Bath Abbey on the first Wednesday of the market and welcomes people of all faiths to participate.   |  |
| <b>3.11 Socio-economically disadvantaged*</b> – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances<br><b>(this is not a legal requirement, but is a local priority).</b> | <p>The security teams are briefed to work closely and respectfully with groups of vulnerable people such as rough sleepers and to forge good relationships with those who earn a living through a supported work scheme such as the Big Issue vendors. The objective is not always to displace but assist and respond to those in need.</p> <p>The event is open and free to all members of the public.</p> |  |
| <b>3.12 Rural communities*</b> identify the impact / potential impact on people living in rural communities  | <p>The event is open and free to all members of the public.</p> <p>Bath has a central bus and train station which is accessible to many rural areas. There are also 3 park and rides servicing Bath – these times are extended, and</p>   |  |

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|  | services more regular to meet the demand of people using these services over the market. |  |
| <b>3.13 Armed Forces Community **</b><br>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 event is open and free to all members of the public.                                 |  |
| <b>3.14 Care Experienced ***</b><br>This working definition is currently under review and therefore subject to change:<br><br>In B&NES, you are 'care-experienced' if you spent any time in your childhood in Local Authority care, living away from your parent(s) for example, you were adopted, lived in residential, foster care, kinship care, or a special guardianship arrangement.             | The event is open and free to all members of the public.                                 |  |

\*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.

\*\*\*The Equality Act does not cover care experienced people. B&NES adopted this group as a protected characteristic in March 2024 alongside over 80 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.

## 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 responsible               | By when                       |
|----------------------------|---|--|-----------------------------------|-------------------------------|
| Printed maps for the event | Christmas Market team to continue to deliver a printed map that can be found on site or posted in advance of the event – this to be offered alongside our online interactive map. | Our 2025 map is now in its creation phase, and will be completed and ready to send to the printers beginning of November | Event Manager & Marketing Manager | 3 <sup>rd</sup> November 2025 |
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## 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](mailto:equality@bathnes.gov.uk)), who will publish it on the Council's website. Keep a copy for your own records.

**Signed off by:** L J Deane – Head of Community & Compliance

**Date:** 21 October 2025