APPENDIX X

INITIAL EQUALITY IMPACT ASSESSMENT AND ANALYSIS (EqIAA) REVIEW OF THE STREET TRADING POLICY

Please Note:-

This document describes an initial assessment of equalities impacts in relation to the *"Review of the Street Trading Policy"*

The council has a statutory duty to consider the impact of its actions in relation to the following protected characteristic groups:-

1. Age
2. Disability
3. Gender Reassignment
4. Marriage and Civil Partnership
5. Pregnancy and Maternity
6. Race
7. Religion or Belief
8. Sex
9. Sexual Orientation

In addition, council policy includes consideration of the impact of its actions in relation to 'socio-economic groups', the 'Armed Forces Community' and 'Care Leavers'.

Therefore, the council wishes to hear and proactively consider any comments in relation to how any aspect of the options presented may impact on any sections of the community as listed above. Any feedback in relation to equalities and any point raised within this document will inform a full Equality Impact Assessment and Analysis of the Annual Review of Hackney Carriage Fares proposals.

You can find out more at **consultation@southglos.gov.uk**

or sending your comments to:

Executive Director - Place, Licensing Service, PO Box 1954, Bristol, BS37 0DD or to Taxis@southglos.gov.uk,

Phone: 01454 868154

Copies of the consultation are available from your local library or one stop shop.

The consultation starts on 31st July 2026 for a 12 week which closes on 23rd October 2026

SECTION 1 - INTRODUCTION

The purpose of the revised Street Trading Policy is to update the Council's approach to the regulation of street trading within South Gloucestershire. The revised policy modernises administrative processes, reflects current legislation and regulatory best practice, introduces a proportionate and risk-based approach to renewals and improves transparency in the determination of applications while continuing to protect public safety, prevent public nuisance and support local businesses.

What are the main changes?
The principal changes include:

- updated policy objectives reflecting proportionate regulation;
- expanded decision-making criteria to improve transparency and consistency;
- updated enforcement principles reflecting the Regulators' Code;
- inclusion of complaints handling and UK GDPR provisions.

What is the intended outcome?
To provide an up-to-date, transparent and proportionate Street Trading Policy which supports economic activity whilst safeguarding public safety, protecting local amenity and ensuring fair and consistent decision-making.

SECTION 2 - RESEARCH, ENGAGEMENT AND CONSULTATION

NB. This section will be updated post consultation.

Evidence used
The following information has informed the review of the policy:

- The existing South Gloucestershire Street Trading Policy (2019).
- The Local Government (Miscellaneous Provisions) Act 1982.
- Equality Act 2010.
- Regulators' Code.
- Operational experience gained through administering the current policy.
- Review of current street trading practices and procedures.

Consultation undertaken
The draft policy has been prepared following a review of the existing policy and operational practices.

Consultation will be undertaken as identified within Appendix 4 of the draft policy, including:

- Existing Street Trading Consent holders.
- Avon and Somerset Police.
- Relevant Responsible Authorities.
- South Gloucestershire Town and Parish Councils.
- Elected Members.
- Local business representatives.
- Residents' groups and other interested parties.

Any responses received through the consultation process will be considered before the final policy is presented for adoption by the Regulatory Committee.

Summary of consultation findings
Overall, the proposed amendments are intended to simplify administrative processes whilst maintaining appropriate safeguards for public safety and local amenity.

Data and evidence gaps

No evidence has been identified to suggest that the revised policy will adversely affect any group sharing a protected characteristic. Equality impacts will continue to be monitored through complaints, applications, enforcement activity and future policy reviews.

SECTION 3 - IDENTIFICATION OF DISPARITIES, IMPACTS, AND ISSUES

NB. This section will be updated post consultation.

Identified Disparities and Impacts
Age, Impact: Neutral

The revised policy applies equally to applicants regardless of age. Existing provisions preventing the grant of a Street Trading Consent where it would contravene the Children and Young Persons Act 1933 remain unchanged. The policy does not introduce any additional age-related restrictions.

Disability, Impact: Neutral

No specific impacts have been identified.

Sex, Impact: Neutral

The policy applies equally to all applicants irrespective of sex. No differential impacts have been identified.

Gender Reassignment, **Impact:** Neutral

No specific impacts have been identified.

Pregnancy and Maternity, **Impact:** Neutral

No specific impacts have been identified.

Race, **Impact:** Neutral

The policy applies equally regardless of race or ethnicity.

Applicants are required to demonstrate their entitlement to work in the United Kingdom where required by legislation. These requirements arise from national immigration legislation rather than local policy and apply consistently to all applicants.

Religion or Belief, **Impact:** Neutral

The policy continues to allow consideration of the suitability of trading locations, including where proposals may affect places of worship. Decisions will continue to be made on an evidence-based and proportionate basis and no adverse impacts have been identified.

Sexual Orientation, Impact: Neutral

No impacts have been identified. The policy applies consistently to all applicants.

Marriage and Civil Partnership, Impact: Neutral

The policy does not distinguish between applicants based upon marital or civil partnership status.

Other Communities or Groups

Small Businesses and Sole Traders, **Impact:** Positive

The revised policy is expected to reduce administrative burdens for compliant traders through the introduction of streamlined renewal arrangements and proportionate consultation requirements. This should reduce costs and unnecessary delays whilst maintaining appropriate regulatory oversight.

Community Organisations and Event Organisers, **Impact:** Positive

No specific impacts have been identified.

Local Residents, Impact: Neutral to Positive

The policy retains existing safeguards relating to highway safety, environmental protection, public nuisance and consultation. It also provides clearer decision-making criteria, helping to ensure that residents' concerns continue to be considered consistently and transparently.

Summary of Equality Impacts

No evidence has been identified that the revised Street Trading Policy will have a disproportionate adverse impact on any protected characteristic under the Equality Act 2010.

The changes are largely administrative and procedural in nature. Overall, the revised policy is expected to deliver modest positive impacts by reducing unnecessary administrative burdens, improving transparency in decision-making, and maintaining appropriate safeguards to protect the public and local communities. Monitoring will continue through the Council's complaints procedures, licensing activity and future policy reviews.

This approach is balanced and evidence-based, which is generally what South Gloucestershire's EqIAAs aim for. It recognises genuine positive effects where they exist rather than simply recording "neutral" across all characteristics.

SECTION 4 - ACTIONS TO BE TAKEN

NB. This section will be updated post consultation.

At this stage, consultation is being conducted.

1. All feedback will analysed and this EqIAA document will be updated to reflect all feedback received.

SECTION 5 - EqIAA OUTCOME

NB. This is an initial EqIAA, therefore, there is no outcome at this stage until all consultation feedback has been analysed and considered and this EqIAA updated.

Outcome	Response	Reason(s) and Justification
Outcome 1: No major change required.	☐	

Outcome 2: Adjustments to remove barriers or to better promote equality have been identified.	☐	
Outcome 3: Continue despite having identified potential for adverse impact or missed opportunities to promote equality.	☐	
Outcome 4: Stop and rethink.	☐	