

Bristol City Council Equality Impact Assessment Form

(Please refer to the Equality Impact Assessment guidance when completing this form)



Name of proposal	Sports Asset Transfer
Directorate and Service Area	Growth and Regeneration. Parks and Green Spaces
Name of Lead Officer	Richard Fletcher

Step 1: What is the proposal?

Please explain your proposal in Plain English, avoiding acronyms and jargon. This section should explain how the proposal will impact service users, staff and/or the wider community.

1.1 What is the proposal?

In May 2018 the council adopted a proposal to operate "chargeable sports facilities and other facilities in public parks only when they generate no cost to the council".

Following public consultation, cabinet is being asked to:

- approve the transfer of a number of sports facilities in parks and green spaces to be operated by third parties; and
- approve a revised charging regime for sports sites in parks (excluding the Downs) not subject to transfer such that they are operated at no cost to the Council.

Step 2: What information do we have?

Decisions must be evidence-based, and involve people with protected characteristics that could be affected. Please use this section to demonstrate understanding of who could be affected by the proposal.

2.1 What data or evidence is there which tells us who is, or could be affected?

The proposals act on cricket, football and bowls played in publicly accessible parks and green spaces owned and managed by the council.

Bowls:

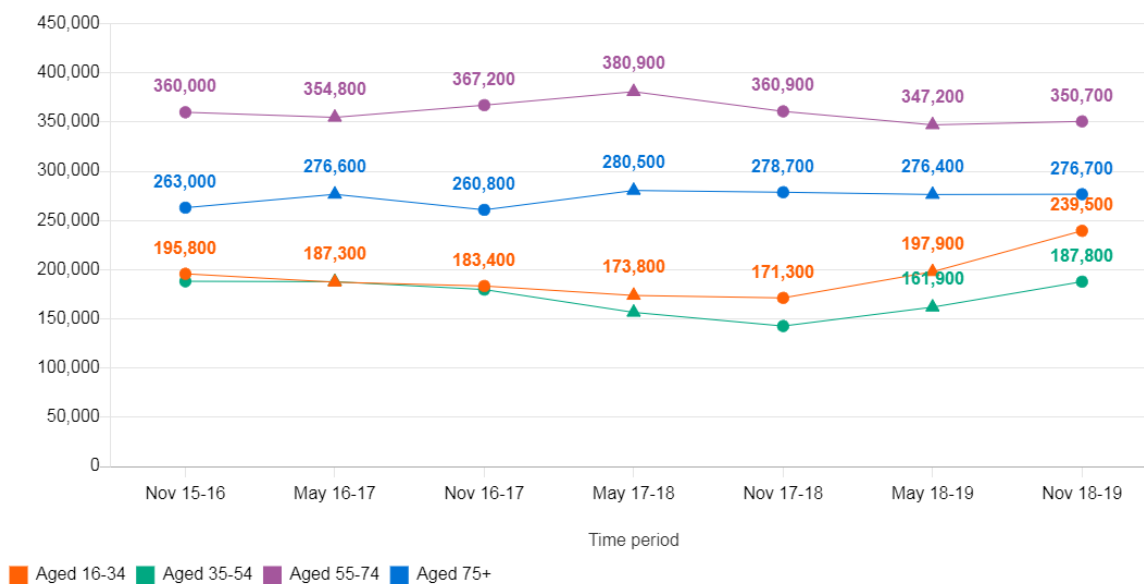
The Bowls Development Alliance is funded by Sport England to support Bowls England (BE) and the English Indoor Bowling Association (EIBA) to develop the sport of flat green bowls. Its Play Bowls Strategy 2017 – 2021 gave national participation figures as:

Age range	2018 England population projection (ONS) %	BDA age participation breakdown 2017 - %
55 and under	69.99	7.66
55 and over	30.01	92.3
55-64	11.82	11.1
65-74	9.91	49
75 and over	8.27	32.2

This is supported by separate data available from Sport England:

Participation in the last year - yes or no - Participated in the last year

Bowls



The BDAs Play Bowls Strategy also gave participation figures for disabled people as 41.4% of those who play (2015). The relevant 2011 Census figures for comparison are:

- Day-to-day activities limited a lot = 9%
- Day-to-day activities limited a little = 9%
- Day-to-day activities not limited = 82%

The Strategy identified the gender split of participants to be:

- 66.8% Male

- 33.2% Female

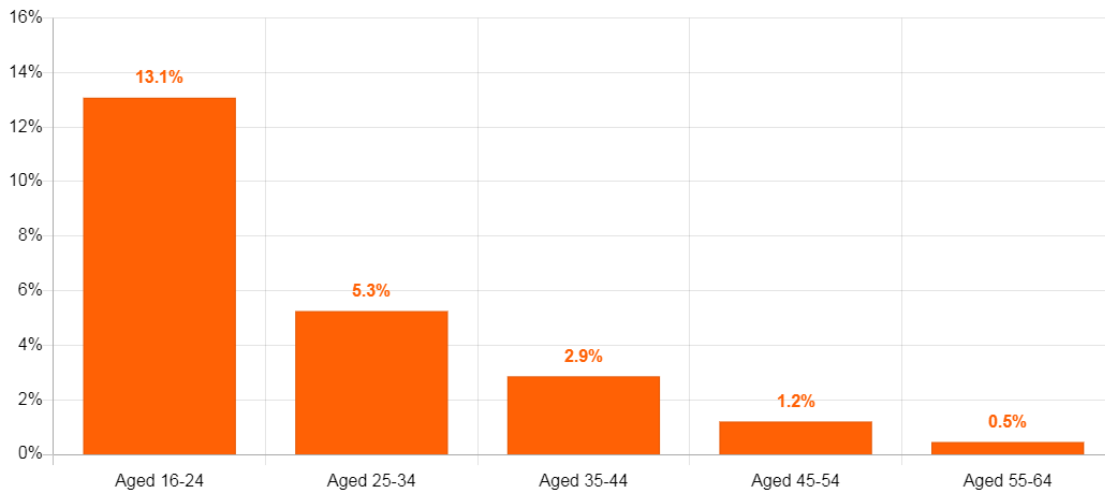
The public consultation exercise on the sports asset transfer that took place in the summer of 2019 strongly suggested the age profile for the six bowls clubs primarily affected by the proposal (estimated membership 250 [Gloucestershire Bowls Association, 2019]) is comparable to the national picture. A selection of qualitative comments made include:

- *“Average age group of bowlers is 60 years +.”*
- *“My interest as a Pensioner is around the bowls facilities.”*
- *“Bowls is generally a game for persons aged 60 and over and with the retirement age increasing to 65 +, players are not coming into bowls until even older.”*
- *“At present the club has 51 members 11 of which are 80 plus with the eldest being 97.”*
- *“Bowling is the one thing that can be played by older people with limited fitness and one of the active things that they can participate in.”*
- *“[Bowls] - a sport enjoyed by countless members of the community, a large proportion of whom are in the older age bracket and for whom exercise is essential.”*
- *“...it is arguable that the greatest impact would be likely amongst the older and often financially-less-well-off members of the community.....the Council may be in danger of removing the one sport that is accessible to older people.”*
- *“The sports facilities offered are key to the success of the parks they attract participants and spectators bowls is particularly helpful in keeping older citizens active physically and socially....”*
- *“Many Clubs have an ageing membership are finding it difficult to recruit sufficient new Members, particularly in the under 60s age Group which is so necessary to sustain the sport in future.”*
- *“Bowls is a sport that can be played by all age groups, unlike most other sports - anyone from age 6-100. However, it would be fair to acknowledge that the age profile is heavily skewed towards the older age groups, because this is indeed a game that they are still able to play. Bowls is not a sport for older people, but a sport that can be played by older people, and there are VERY few such sports.”*
- *“Increasing numbers of older (+ 65) people are in fact playing the game. The Bowls Development Alliance (BDA) – Sport England’s vehicle for development of the sport - actually ran, successfully, a scheme to*

promote the game to Over 50s in 2017 (to try to get people still at work to think about what healthy activities they might take up in later life)."

Football:

Sport England have produced participation figures at a national level with some applying to the Bristol area. However participation figures for people who may be affected directly by the proposals are not available:

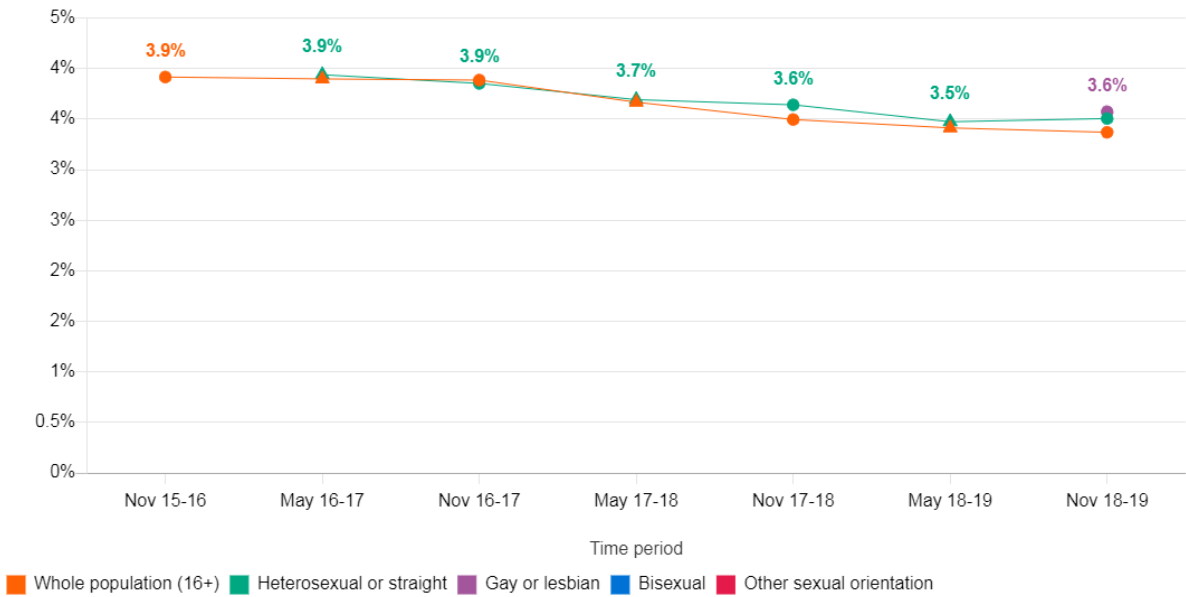


■ 11 a-side football

The table above identifies the percentage of people from the given age bracket that play 11-a-side football in England. We can compare this with the ONS 2018 population prediction for England:

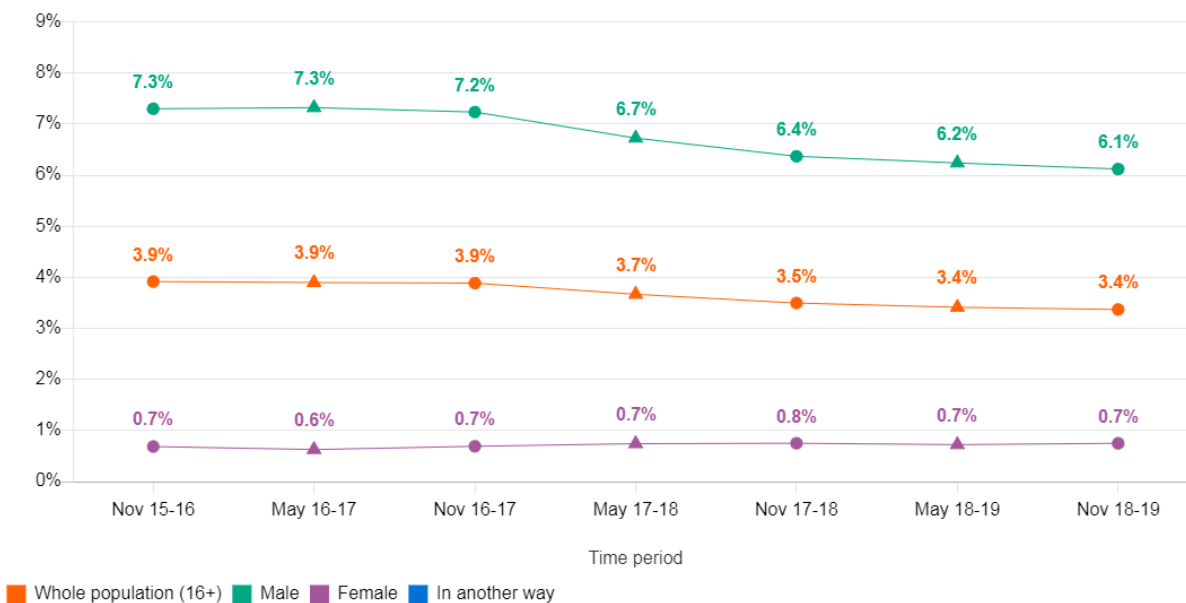
Age range	2018 England population projection (ONS) %	% of people that play 11-a-side football
Aged 16-24	29.93	13.1
Aged 25-34	13.58	5.3
Aged 35-44	12.70	2.9
Aged 45-54	13.78	1.2
Aged 55-64	11.82	0.5

Participation in the last year - yes or no - Participated in the last year
11 a-side football



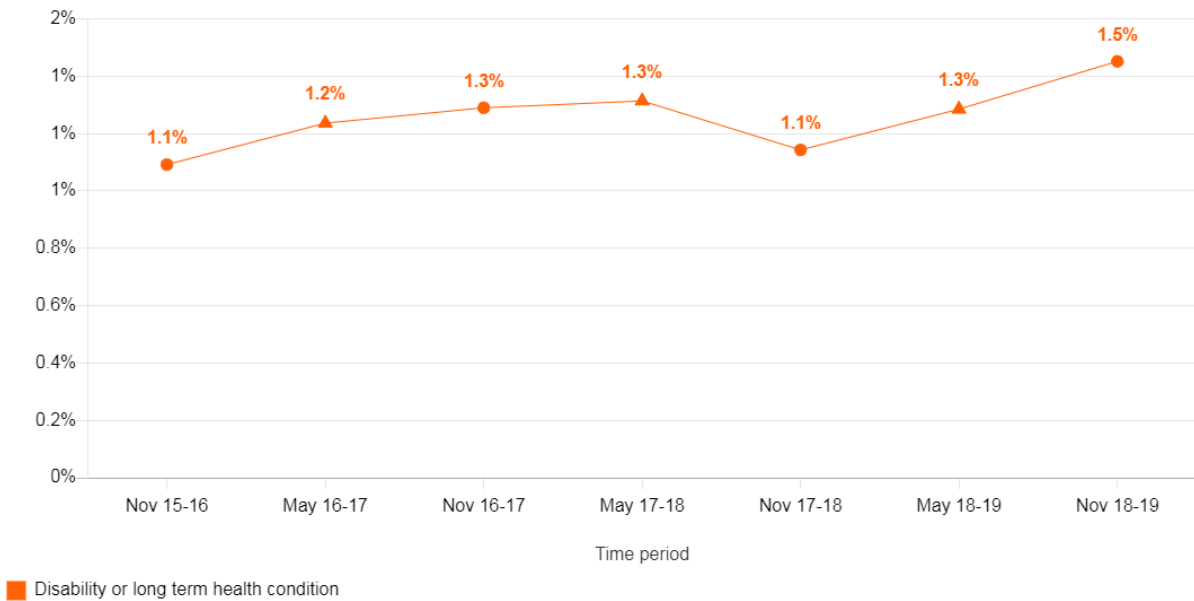
The table above identifies that nationally, participants in football who identify themselves as gay or lesbian, bisexual or another sexual orientation are less than those who identify themselves as heterosexual or straight over a four-year period.

Participation in the last year - yes or no - Participated in the last year
11 a-side football

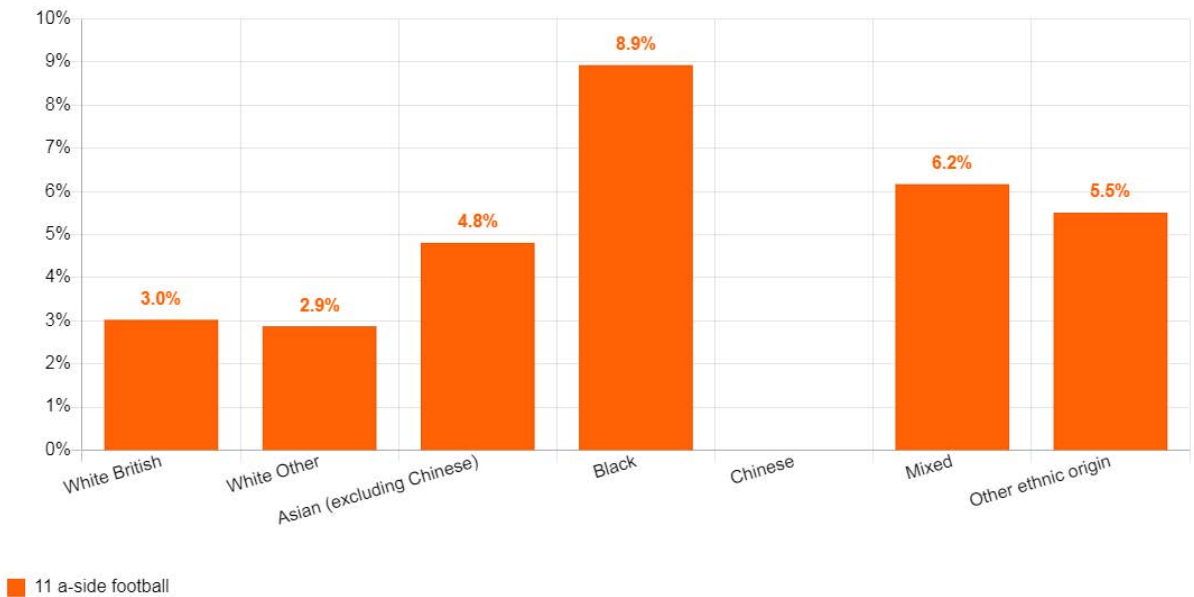


The table above identifies that nationally, a higher proportion of participants in football are male.

Participation in the last year - yes or no - Participated in the last year
11 a-side football



The table above identifies that nationally, a lower proportion of participants in football consider themselves as disabled or with a long-term, limiting health condition. This is much lower than the population average in England.



This table represents the % of the relevant ethnic group who play football (rather than the % of the total football playing population) nationally. This demonstrates that football is played by a proportionately higher percentage of Black, Asian and minority ethnic people than White British people.

Cricket:

There are only three teams that play cricket on council-operated pitches that are within scope of the proposal. Only two pitches are available. These are all male teams with a predominantly Black, Asian and minority ethnic background.

2.2 Who is missing? Are there any gaps in the data?

Direct, relevant quantitative data relating to participation in sport at the specific facilities in-scope is not available.

Direct, relevant quantitative data relating to participation in sport at a city resolution has not been found.

Missing data (not found) at a national resolution:

- Bowls – gender reassignment, race, religion or belief, sexual orientation, marriage and civil partnership, pregnancy and maternity.
- Cricket – across all protected characteristics;
- Football – marriage and civil partnership, pregnancy and maternity, gender reassignment.

Direct quantitative, data is not available to identify those who may wish to participate in the sport locally and who may be encouraged to do so were the proposals to be implemented. There is some qualitative data available from BCC public consultations and engagement exercises that inform us that the low quality of the assets in scope is a barrier to their use.

Direct quantitative, data is not available to determine whether the proposals would have a deleterious impact on participation levels in Bristol as a whole or locally (e.g for football, pitches are bookable annually and teams commonly migrate across sites).

2.3 How have we involved, or will we involve, communities and groups that could be affected?

The council carried out a public and targeted consultation on options to deliver savings to Parks budgets between 6th November 2017 and 29th January 2018. This specifically consulted on a policy of operating sport in parks at no cost to the council. Sports clubs and equalities communities were targeted as part of promoting the consultation.

The council carried out a public consultation between 28th May and 9th July 2019 on options to deliver the approved policy of operating sport in parks at no cost to the council. Sports clubs were specifically targeted as part of that

consultation as were sports governing bodies (England & Wales Cricket Board, Rugby Football Union, Football Association, Gloucestershire Bowls Association) and the Football Foundation.

Further direct engagement work took place with all the bowls clubs affected and the Gloucestershire Bowls Association from October 2019 to January 2020.

Step 3: Who might the proposal impact?

Analysis of impacts on people with protected characteristics must be rigorous. Please demonstrate your analysis of any impacts in this section, referring to all of the equalities groups as defined in the Equality Act 2010.

3.1 Does the proposal have any potentially adverse impacts on people with protected characteristics?

a) Age

Section 2.1 identifies that the relative age of participants in bowls is significantly higher than the population average for England. This is supported by empirical information from the council's consultation processes. This is measurable nationally and there is strong qualitative evidence that Bristol follows this trend. There is the potential for the proposal to have an adverse impact on older people if:

- i. The proposal leads to the closure of clubs and this in turn leads to participants leaving the sport;
- ii. The proposal leads to an increase in fees and this in turn leads to participants leaving the sport.

Consultation with bowls clubs themselves in Bristol and evidence from the Bowls Development Alliance suggests that an outcome of lower participation may have subsequent impacts on mental and physical health and wellbeing due to lower activity levels and greater social isolation. For example, bowls participants in the city made the following comments:

- *“Benefits - social, meeting with "like" people and a reason to get out the house - mental and physical benefits to keep healthy - keeping more clubs playing in competitions and friendly games throughout the season and encouraging the sport that can be played by people*

up in years. This is across Bristol and South Gloucestershire, the impact of losing clubs will have a wider detrimental affect on people, not just the members of clubs listed."

- *".....as a Pensioner bowls facilities provide me with the exercise and social activities that are recommended for physical and mental health. Withdrawing these units in any way will be detrimental to the health of the community."*
- *"Our club offers a lifeline to many people who live alone and we provide friendship and exercise."*
- *Bowls is generally a game for persons aged 60 and over..... This age group do not necessarily have the finances to pay for the funding suggested and you would be denying this age group the opportunity to keep active and fit..."*
- *"This [bowls] has got to be helping the older members keep active with both their physical and social needs."*
- *"Bowling is the one thing that can be played by older people with limited fitness and one of the active things that they can participate in."*
- *".....Bowls - a sport enjoyed by countless members of the community, a large proportion of whom are in the older age bracket and for whom exercise is essential. Withdrawing the access to such facilities would result in reduced activity at an age when it is essential for older people to be active."*
- *"Although increased charges for local-authority-provided sport might have an adverse impact on participation in all sports, it is arguable that the greatest impact would be likely amongst the older and often financially-less-well-off members of the community. Just at the point in their life when it becomes a struggle to keep people both healthy and happy, because of their age, the Council may be in danger of removing the one sport that is accessible to older people."*
- *"The sports facilities offered are key to the success of the parks they attract participants and spectators bowls is particularly helpful in keeping older citizens active physically and socially the Council is likely to see an increase in social care costs where the elderly become less mobile and isolated."*

Section 2.1 identifies that proportionately more young people play

football on 11-a-side pitches nationally. Assuming this pattern applies to Bristol and to the facilities that are within scope of the proposal, there is the potential for the proposal to have an adverse impact on younger people and young adults if:

- i. The proposal leads to the closure of clubs and this in turn leads to participants leaving the sport;
- ii. The proposal leads to an increase in fees and this in turn leads to participants leaving the sport.

b) Disability

Section 2.1 identifies that the percentage of bowls participants that may consider themselves to be disabled is likely to be significantly higher than the population average in England. This is measurable nationally and it can be presumed this applies locally although there is a lack of data in this respect. There is the potential for the proposal to have an adverse impact on disabled people if:

- i. The proposal leads to the closure of clubs and this in turn leads to participants leaving the sport;
- ii. The proposal leads to an increase in fees and this in turn leads to participants leaving the sport.

Evidence from the Bowls Development Alliance suggests that an outcome of lower participation may have subsequent impacts on mental and physical health and wellbeing due to lower activity levels and greater social isolation.

c) Gender reassignment

No adverse impact identified.

d) Marriage and civil partnership

No adverse impact identified.

e) Pregnancy and maternity

No adverse impact identified.

f) Race.

Section 2.1 identifies that proportionately more people from Black, Asian and minority ethnic communities play football on 11-a-side pitches nationally. Assuming this pattern applies to Bristol and to the facilities

that are within scope of the proposal, there is the potential for the proposal to have an adverse impact on BAME participants if:

- i. The proposal leads to the closure of clubs and this in turn leads to participants leaving the sport;
 - ii. The proposal leads to an increase in fees and this in turn leads to participants leaving the sport.
- g) Religion or belief
No adverse impact identified.
- h) Sex
No adverse impact identified.
- i) Sexual orientation
No adverse impact identified.

3.2 Can these impacts be mitigated or justified? If so, how?

Participation in sport, on those assets within scope of the proposal, appears to be in decline. Conversations with sports governing bodies and with clubs through the local consultation processes, and information from the council's play pitch strategy, strongly suggest this is because of the condition and standard of the facilities the council is able to offer and the growth in other provision within the city – including the provision of facilities with artificial playing surfaces. Of course there are successful clubs in bowls, cricket and football that are succeeding in attracting new members and are growing; examples being Ashton Boys Football Club and Begbrook Green Bowls Club.

To continue with the current operating model can only lead to further decline and likely less participation and interest in using these sites. The council and its Parks Service is under severe financial pressure and unable to uplift the quality of facilities maintenance and management in the short and medium term.

In seeking a new operating model, the council hopes and expects to drive innovation and ownership from communities to ensure that local sport thrives and is financially sustainable.

To facilitate the preferred option the Council would invest in facilities where sustainable business plans are agreed with third parties and would work in

partnership to realise additional financial support and expertise from sports governing bodies and others.

3.3 Does the proposal create any benefits for people with protected characteristics?

The Council has the opportunity to agree with new operators conditions of service that can and will support participation by those communities and residents with protected characteristics that are currently underrepresented. By accessing external grant funds, particularly those provided by sports governing bodies or similar, a sports development plan is likely to be a pre-condition of a successful application.

The proposal also creates an opportunity for clubs that are run by communities with protected characteristics to put in an expression of interest to operate and manage a facility and the provision of the sport.

3.4 Can they be maximised? If so, how?

See above.

Step 4: So what?

The Equality Impact Assessment must be able to influence the proposal and decision. This section asks how your understanding of impacts on people with protected characteristics has influenced your proposal, and how the findings of your Equality Impact Assessment can be measured going forward.

4.1 How has the equality impact assessment informed or changed the proposal?

The impact assessment has confirmed through qualitative data sources what was understood by service knowledge and through engagement with sports clubs and governing bodies as part of proposal development.

The assessment has highlighted the lack of co-ordinated, collated data on equalities communities use of council facilities. This deficit needs to be corrected through the implementation of the proposal and a requirement of future operators.

4.2 What actions have been identified going forward?

An asset transfer process would begin for third parties with an expressions of interest process. Third parties are likely to be clubs, community organisations,

current sports operators or partnerships of these. This process will test applicants understanding of how their activities and particular sport are accessed by people with protected characteristic and how their proposal to operate will improve and protect participation by these communities.

When assessing the EOIs it is expected that the council will work alongside governing bodies and potentially funding bodies to make a decision to invite to further stages. We will build in a further opportunity to see how applications align with funding programmes and governing bodies strategic aims for participation by diverse communities – and therefore most likely to success with funding and building a sustainable operating model.

Those applicants that progress past the first stage will be invited to put forward a business plan that will be tested and developed with officer support including how their growth plans will include participation that is representative of Bristol's diverse communities.

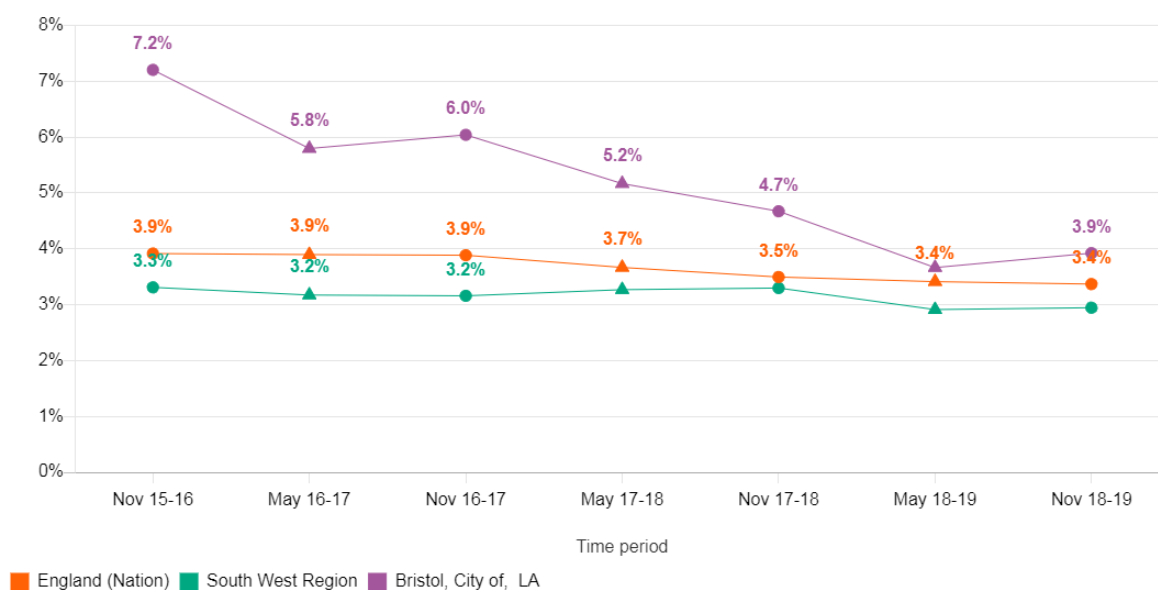
When assets are transferred there is an opportunity to invest in facilities so that they become more inclusive – reasonable adjustments made to improve access for disabled people and signage identifying that information can be provided in other languages for example.

We are currently expecting a high take-up of facilities for operation by third parties. However for those facilities that are not, these may be subject to significant price rises to access. Should this be the case the council will now build in a further round of engagement as to how this might be managed to ensure that clubs that support diverse communities can continue to play either on council or non-council pitches. This will be within the context of the current or a revised playing pitch strategy which maps and predicts supply and demand for sport in the city.

We know that football on 11-a-side pitches is in general decline – in favour of smaller artificial pitches and facilities. This will likely mean less demand for those pitches that are not released to third party operators.

Participation in the last year - yes or no - Participated in the last year

11 a-side football



4.3 How will the impact of your proposal and actions be measured moving forward?

New operators will be subject to a service level agreement that will include a requirement to submit sport and facilities participation data. Should the council set up a single access booking system as part of the transfer process this will also be required to collate participants demographic information.

The council when working with operators will need to bear in mind however that only 47.8% of people in Bristol aged 65+ say they are comfortable using digital services, compared to 81.8% overall (quality of Life in Bristol survey). We need to ensure that wherever possible telephone numbers are provided as an alternative to digital services where face-to-face services are not available.

A revision of the council’s playing pitch strategy will collate, report, predict demand and set strategic objectives for participation levels across all outdoor sport in the city including participation by people with protected characteristics.

Service Director Sign-Off:
Patsy Mellor, Director Management of Place
P Mellor

Equalities Officer Sign Off:
Duncan Fleming

Date: 25th August 2020

Date: 14th August 2020