

Equality Impact Assessment [version 2.9]



Title: Leisure Investment Strategy Consultation	
<input type="checkbox"/> Policy <input checked="" type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input checked="" type="checkbox"/> New <input type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: People	Lead Officer name: Guy Fishbourne
Service Area: Public Health	Lead Officer role: Manager – Physical Activity & Sport

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](http://sharepoint.com).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

The proposal relates to nine of the Council’s leisure facilities. The contract for running most of the facilities expires shortly and will go out to tender. The Council has a sum of money in the budget to invest, this proposal is to ensure that it can meet the objectives in the Sport & Physical Activity Strategy. By investing in high foot-fall sites where revenue can be generated and will tackle physical inactivity, also investing in wards that experience multiple deprivation and high inactivity levels. The Council proposes to cease operating two of the facilities in order to protect itself from ongoing revenue investment, and low usage which do not contribute to the objectives set out in the strategy. It is hoped that alternative management can be found for these two facilities. The proposals below will go out for consultation before a final decision is made.

The proposal is as follows:

Easton Leisure Centre	Retain	Possible Investment
Horfield Leisure Centre	Retain	Possible Investment
Bristol South Pool	Retain	Possible investment
Henbury Leisure Centre	Retain	
St Paul’s Sports Academy	Retain	
Jubilee Swimming Pool	Stop Operating	Possible alternative management
Kingsdown Sports Centre	Stop Operating	Possible alternative management

Investment levels have been explored and it is possible to invest in:

1. **Easton Leisure Centre** – increasing the dryside provision including a women only section but reducing the number of badminton courts from 4 to 3
2. **Horfield Leisure Centre** – increased gym provision
3. Mechanical equipment and some customer facing improvements at **Bristol South**

There are two other leisure facilities that are not included in this proposal. Hengrove Leisure Centre and Portway Rugby Development Centre. These have different contracts which are not due for renewal.

This EqIA is overarching, a more detailed EqIA will be progressed in the coming weeks when more equality information on their clientele is provided by the leisure centres.

1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community
<input checked="" type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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Step 2: What information do we have?

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

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

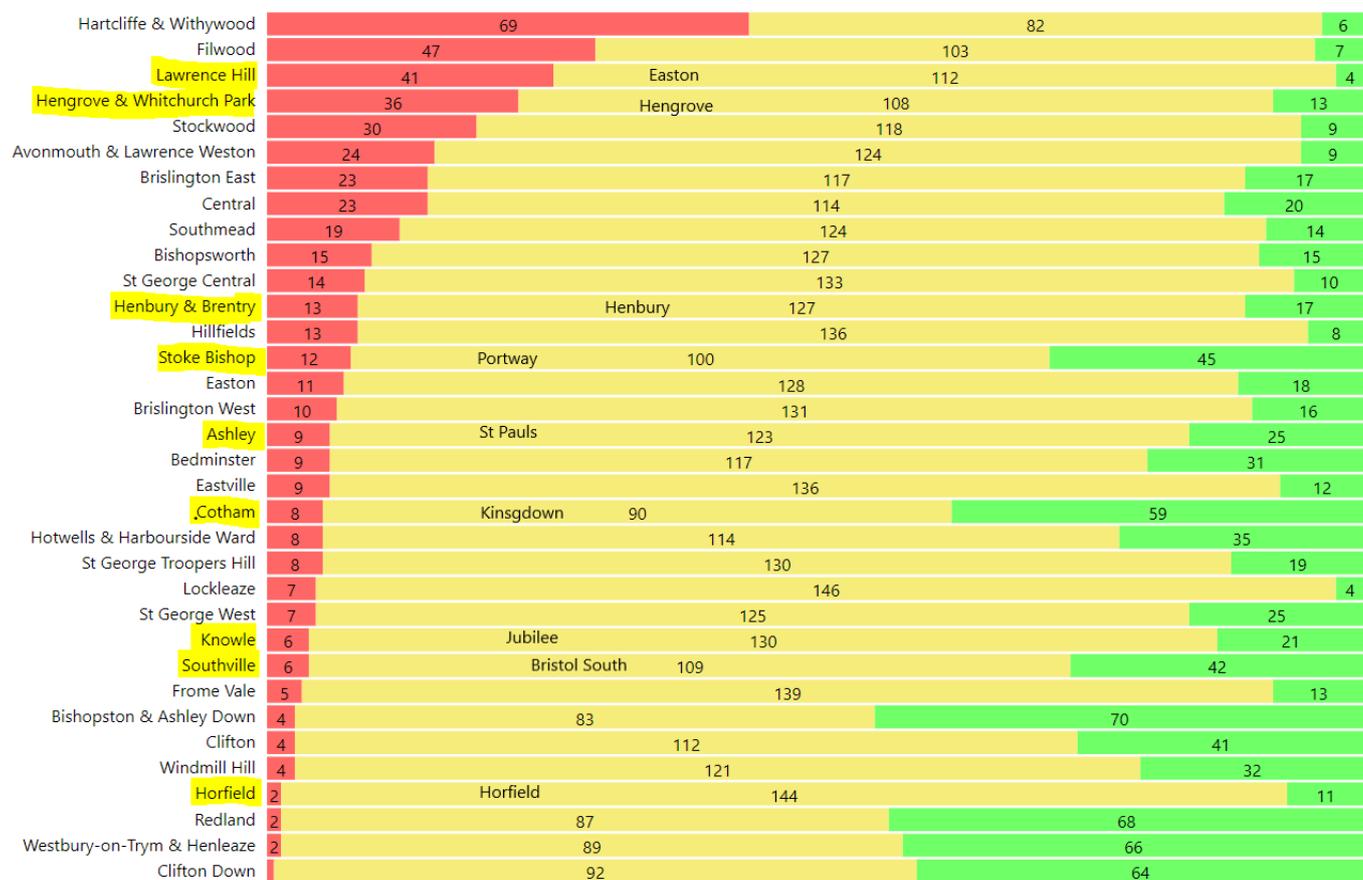
Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

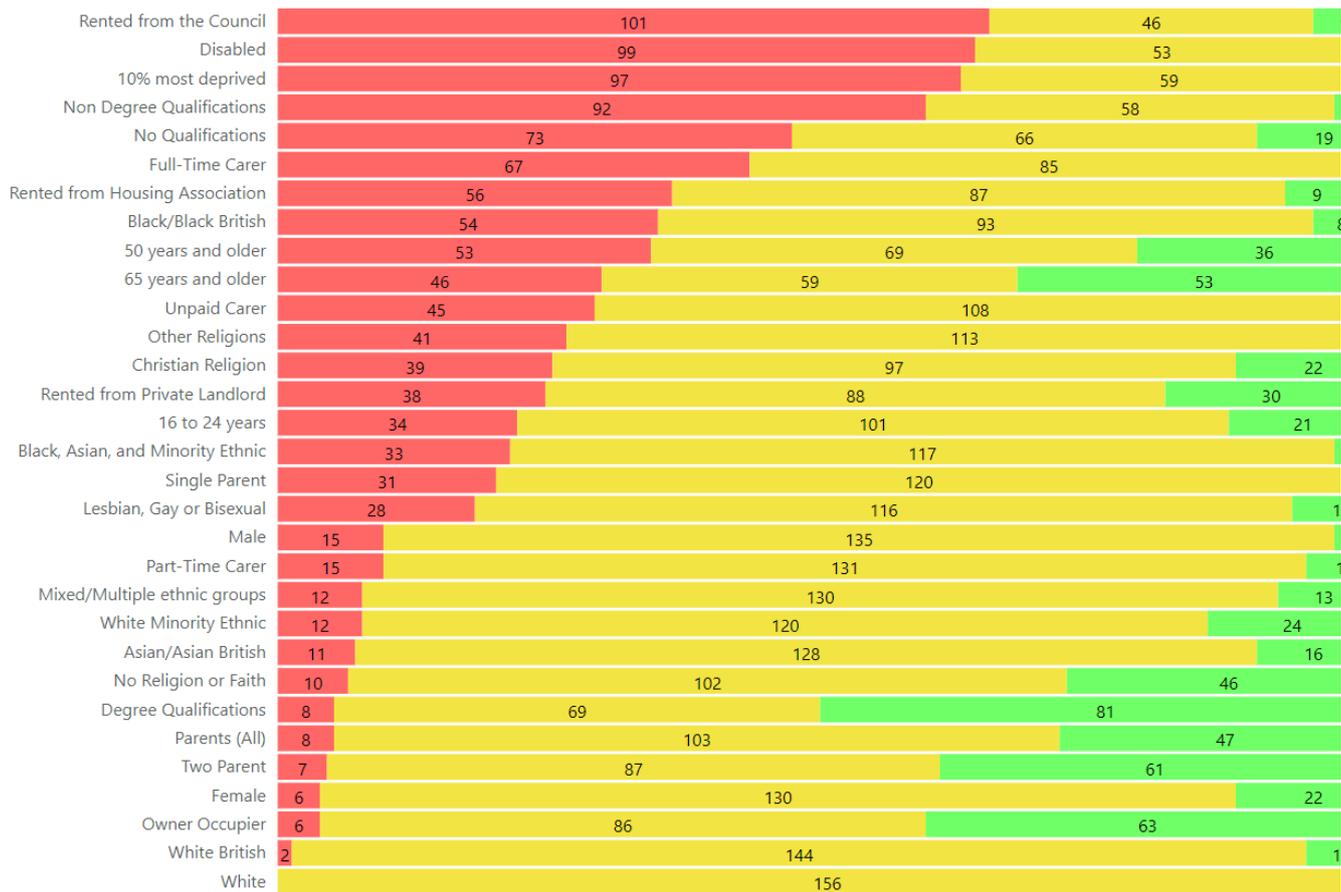
Data / Evidence Source

Bristol Quality of Life Survey 2021

This shows the wards of the facilities and the indices of deprivation and whether they are significantly higher (red) or lower (green) than the Bristol Average



This shows deprivation by group. We are aware that levels of deprivation are indicative of the wider determinants of health and therefore are aware that there is likely to be a relationship between deprivation and levels of physical inactivity.



The above information will inform the consultation process and we will attempt to reach out to those groups with the greater number of indices that are worse than the Bristol average. We will actively seek the views of organisations that represent these groups.

	Bristol	Kingsdown Cotham	Easton Lawrence Hill	Horfield	Henbury Henbury & Brentry	St Pauls Ashley	Bristol South Southville	Hengrove Hengrove & Whitchurch Park	Portway Stoke Bishop	Jubilee Knowle	
Life Expectancy	82.7	88.13	82.2	84.9	83.2	85.04	78.13	83.7	84.41	84.31	Public Health
Premature Mortality	377.5	210.4	600.1	270.2	384.1	343.6	537.4	356.3	212.8	350.1	Public Health
% who say they are in good health	87.12	92.14	80.7	83.9	89.4	85.1	90.6	82.3	93	89.8	Quality of Life
% overweight or obese	46.5	24.9	49.4	55.1	52.7	36.1	35.8	65.4	49	48.6	Quality of Life
% who do enough regular exercise per week	68.2	74.8	66	73	59.5	72.2	74.8	52.1	78.8	70.6	Quality of Life
% who are inactive	8.1	2.8	6.5	9.4	11.7	2.4	5.9	11.4	5.4	4.3	Quality of Life
Age		16-24 0-15 40-54 55-64	0-15 55-64 65+				25-39	55-64 65+	25-39 65+	40-54	ONS 2019
Ethnicity		White British BAME	White British BAME	Indian		White British BAME	White Irish	White British Other White Other Asian Arab Mixed			Census 2011
Religion		Christian Jewish No Religion	Christian Sikh No religion	Hindu Sikh		Christian Buddhist Muslim		Christian Buddhist	Christian Jewish		

We have looked at various indicators of healthy lifestyle and demographic information from several sources (final column above) and have indicated them as per the charts above where the figures are significantly greater than the Bristol average are in red and those significantly smaller in green.

Our proposal suggests investment into Horfield (high footfall and high-income generation and adjacent to areas of multiple deprivation) Easton (based in Lawrence Hill – very high on the chart of multiple deprivation and with high levels of BAME citizens and Bristol South where life expectancy is low and premature mortality high). Our proposals are in line with the Councils corporate commitment to ensure that nobody is left behind.

2.2 Do you currently monitor relevant activity by the following protected characteristics?

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Age | <input checked="" type="checkbox"/> Disability | <input checked="" type="checkbox"/> Gender Reassignment |
| <input checked="" type="checkbox"/> Marriage and Civil Partnership | <input checked="" type="checkbox"/> Pregnancy/Maternity | <input checked="" type="checkbox"/> Race |
| <input checked="" type="checkbox"/> Religion or Belief | <input checked="" type="checkbox"/> Sex | <input checked="" type="checkbox"/> Sexual Orientation |

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

Demographic information is collected by the leisure providers by the use of 'loyalty' cards where people provide demographic and equalities information when they subscribe. This information is reported through the contract management process. It should be noted that the current information may still be skewed by closures through the Covid 19 lockdown and potentially, reluctance by some groups – for example older people- to use the facilities currently. We are currently waiting for information from the providers on their clientele, and a separate EqIA will be completed for each leisure centre.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

The public consultation will be sent directly to interest, representative groups and clientele of leisure centres based on lists supplied by the Consultations and Communications teams. The public consultation link will be emailed to all members of the facilities by the current operator. Specific engagement is likely to be undertaken with "Friends of" groups. The views of the Mayoral Working Group on Participation in Sport & Physical Activity (the acknowledged voice of physical activity in the city) will be sought. We will ensure that communication will be accessible formats for those who ask, and information leaflets are available in Leisure centres.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

We are happy to undertake engagement with stakeholders and liaise with the Equalities Team and the Consultation Team to ensure that appropriate groups are contacted (please see associated consultation comms plan).

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010.

Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc. [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)	
The comments below relate predominantly to those facilities that the council will cease to operate. The impacts may be lessened or negated if alternative management options are found for these facilities.	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We see from ward data that there is a statistically significant number of young people in the ward where Kingsdown is situated.
Mitigations:	There is alternative provision in the area including the facilities operated by Bristol University There is a possibility for the facility to be transferred to an alternative operator
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Jubilee is operated at a higher temperature than the other facilities. We know from the previous consultation that older people prefer the smaller, more compact facility at Jubilee. According to Bristol City Council's ward data, the only age group which is statistically significantly different to the Bristol Average is the 40-54 age group, but we are aware from the previous consultation and the membership data that the pool is used by older people who prefer this facility.
Mitigations:	Negotiations will be undertaken with the management at Hengrove Leisure Centre to provide warmer sessions in their 20m pool and to proactively engage with those current members at Jubilee to enable them to feel comfortable using the larger facility. Although travel times and costs may increase for some users if alternative management options are not realised, conversations have been undertaken with WECA to ensure that there is sufficient public transport to alternative facilities. There is a possibility that management of Jubilee can be transferred to a different operator
Disability	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We know from the previous consultation that some disabled people prefer the warmer water at Jubilee We know from the previous consultation that some people with autism prefer the smaller, more intimate facility at Jubilee to the larger noisier Hengrove.
Mitigations:	Hengrove is a more accessible facility for physically disabled people being compliant with the Inclusive Fitness Initiative and designed and build with accessibility in mind. Work will be undertaken with the management at Hengrove to ensure that the staff are well trained, well informed and welcoming. Pool programming will be addressed to allow for appropriate specific, quieter and warmer sessions There is a possibility that Jubilee can be transferred to a different operator.
Sex	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

Potential impacts:	
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	If alternative management is not achieved for Jubilee Pool, travel time and costs may increase for users.
Mitigations:	
Carers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
Other groups [Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Looked after Children / Care Leavers; Homelessness]	
Potential impacts:	
Mitigations:	

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

Women only provision at Easton will be increased to take account of cultural and religious preference.
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Step 4: Impact

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

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:
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Although travel times and costs may increase for some users if alternative management options are not realised, conversations have been undertaken with WECA to ensure that there is sufficient public transport to alternative facilities.

Supply and Demand analysis on the local provision of pool water space and sports hall provision has been undertaken with several variables both now and including future planned provision and this had indicated that there is sufficient pool water space and sports hall provision across the city and is accessible.

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

Through the public consultation, we hope to engage those groups who are not currently users of the council's leisure facilities and, with the greater understanding provided by the public consultation, inform and shape the procurement strategy for the upcoming re-procurement and provision of leisure services in Bristol. We can then update the EqIA once the community, users of these facilities and stakeholders have had a chance to comment. Each leisure sites will have a detailed EqIA and will include information on groups who use the facilities , and will be used to detail the consultation feedback.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Separate EqIA for each site with details of user demographic	Guy Fishbourne	ASAP
Consultation feedback should be used to update the separate EqIA's	Guy Fishbourne	3 months

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

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

We will closely monitor the leisure contract and will keep the demographic and equalities information collected by the leisure operator under review.
We will use the information from the public consultation to inform the service specification for the new contract

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the Equality and Inclusion Team before requesting sign off from your Director¹.

<p>Equality and Inclusion Team Review: Reviewed by the Equality and Inclusion Team</p>	<p>Director Sign-Off:  Christina Gray, Director for Communities and Public Health</p>
Date: 1 September 2021	Date: 1 September 2021

¹ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.