



Equality Impact Assessment

Title: Leisure Facilities Investment and Leisure Procurement Strategies	
<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 \(EqIA\) \(sharepoint.com\)](#).

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.

This relates to the proposed Leisure Facilities Investment Strategy. 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 Leisure Facilities Investment Strategy and the Leisure Procurement Strategy are aligned to the objectives in the Sport & Physical Activity Strategy. It is proposed in the Leisure Facilities Investment Strategy that the council invests its capital in Easton Leisure Centre and aspires to attract a Leisure Contractor which will invest in Horfield Leisure Centre and/or Bristol South Pool. This EqIA will focus its mitigations on these facilities where appropriate. This will achieve the objective of 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 to protect itself from ongoing revenue investment and usage which does not contribute to the objectives set out in the strategy. It is hoped that alternative management can be found for these two facilities.

The proposal is as follows:

Easton Leisure Centre	Retain	Investment of council capital
Horfield Leisure Centre	Retain	Possible Investment by operator
Bristol South Pool	Retain	Possible investment by operator
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.

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
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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.

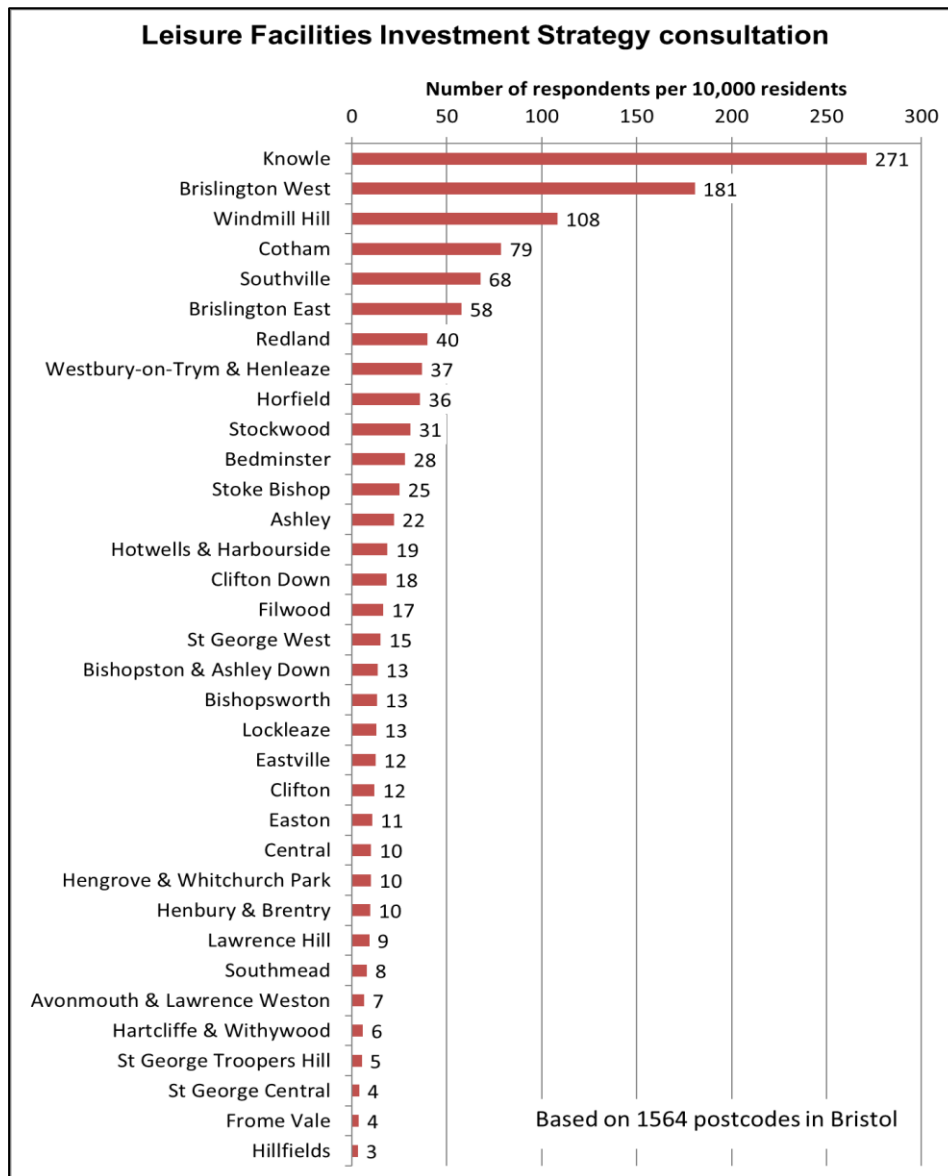
Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics](#)

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

The public consultation on the Draft Leisure Investment Strategy ran from 17th Sept 2021 to 7th Nov 2021 and attracted 1988 responses. The postcode data provided by the respondents indicate that there was a distinct over-representation from the south of the city, reflecting the popular and organised 'Save Jubilee' campaign that ran alongside the public consultation. Please see Figure 1

Figure 1 – responses received to public consultation shown by ward.



The consultation was predominantly online, although paper copies were made available through the Save Jubilee campaign, local councillors and all leisure centres and libraries across the city. Posters were also distributed encouraging people to request the consultation documents in different formats and languages. The consultation was translated into Mandarin as a result of one such request. A telephone number and email address were also supplied to enable people to contact the council to make requests for assistance with the consultation.

Responses were monitored throughout the consultation and because of the low numbers of respondents from younger people and from specific wards – predominantly those with areas of high deprivation, efforts were made by the council's external communications team to reach out to these specific communities.

Responses were under-represented in terms of population proportion from young people under 24-year-olds, Black and Minority Ethnic groups. Disabled people were also underrepresented. 17% of Bristol residents are disabled, this includes citizen whose activities are limited a lot, and those whose activities are limited a little. 8 % of disabled citizens responded to the questionnaire.

Please see Figures 2, 3 and 4.

Figure 2 – responses to public consultation by age

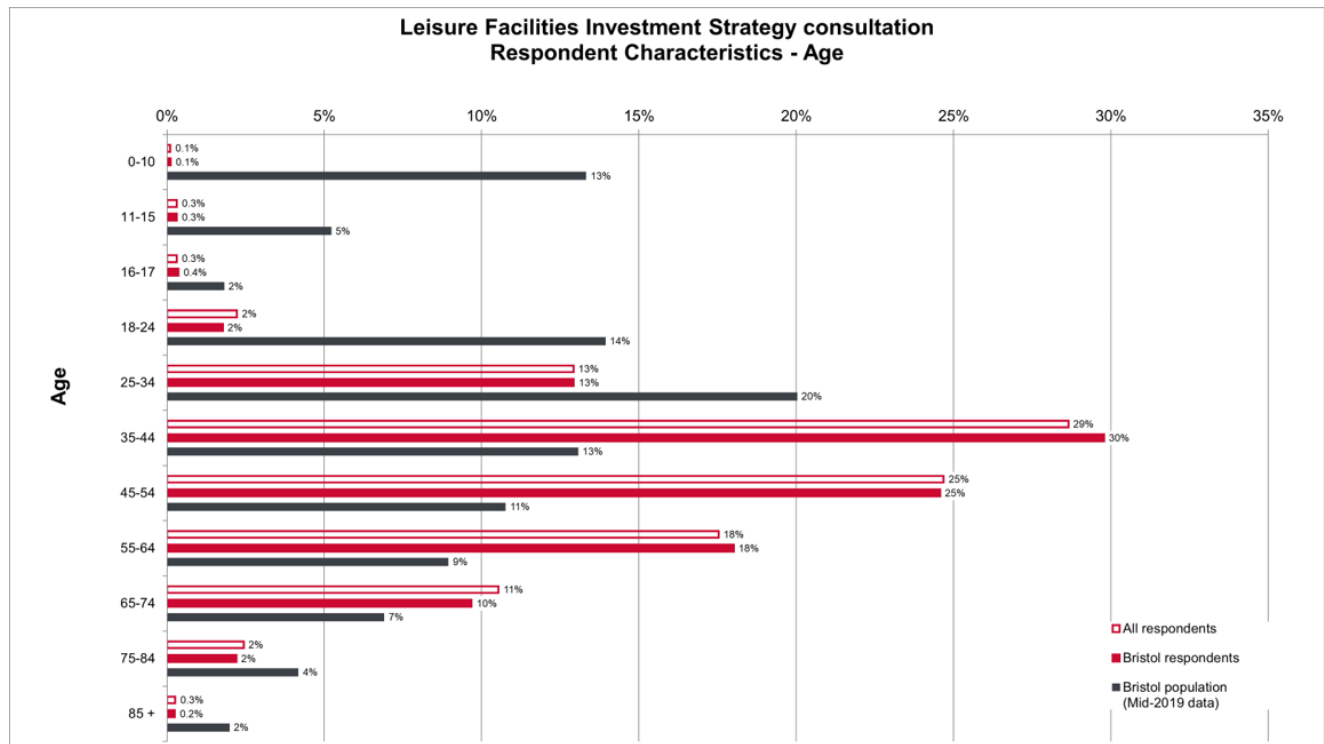


Figure 3 Ethnicity of respondents to the consultation

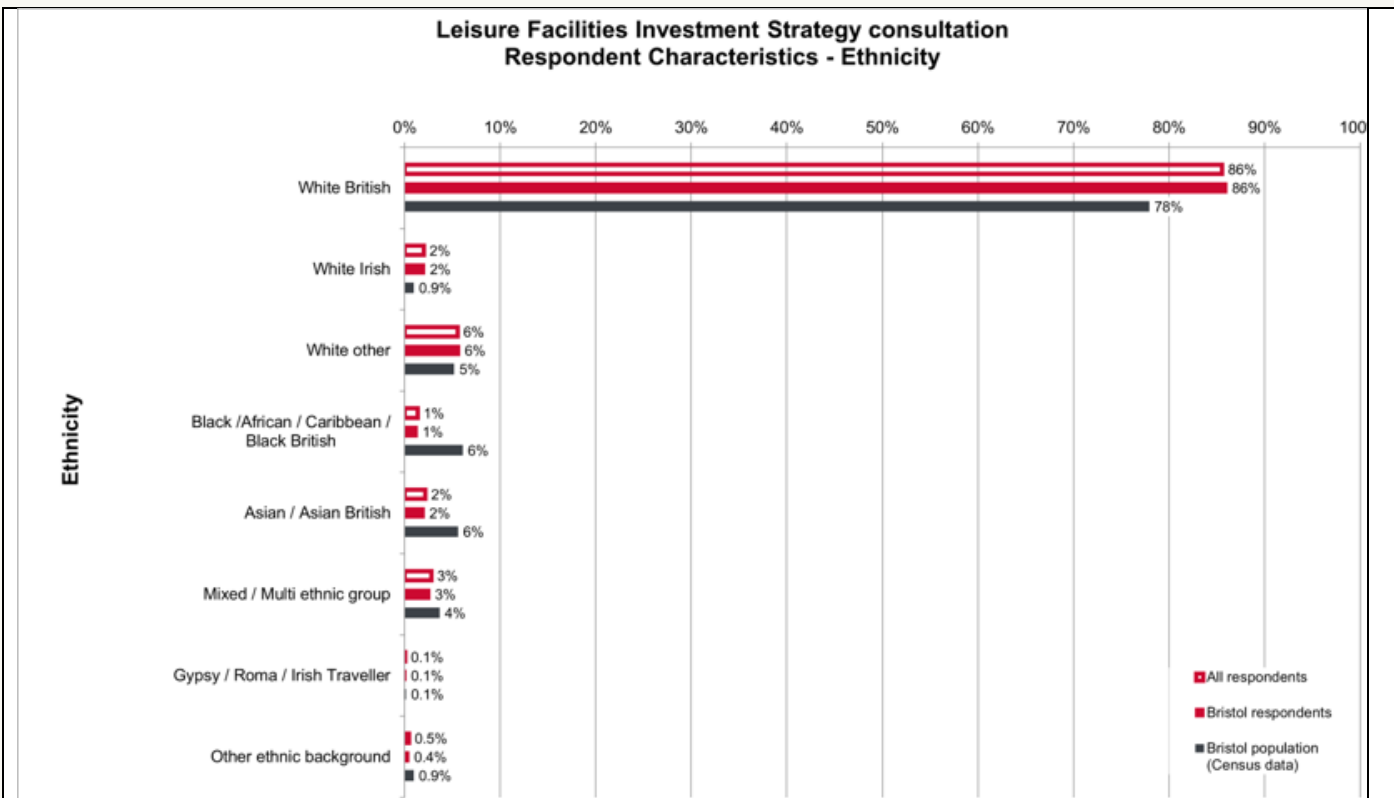
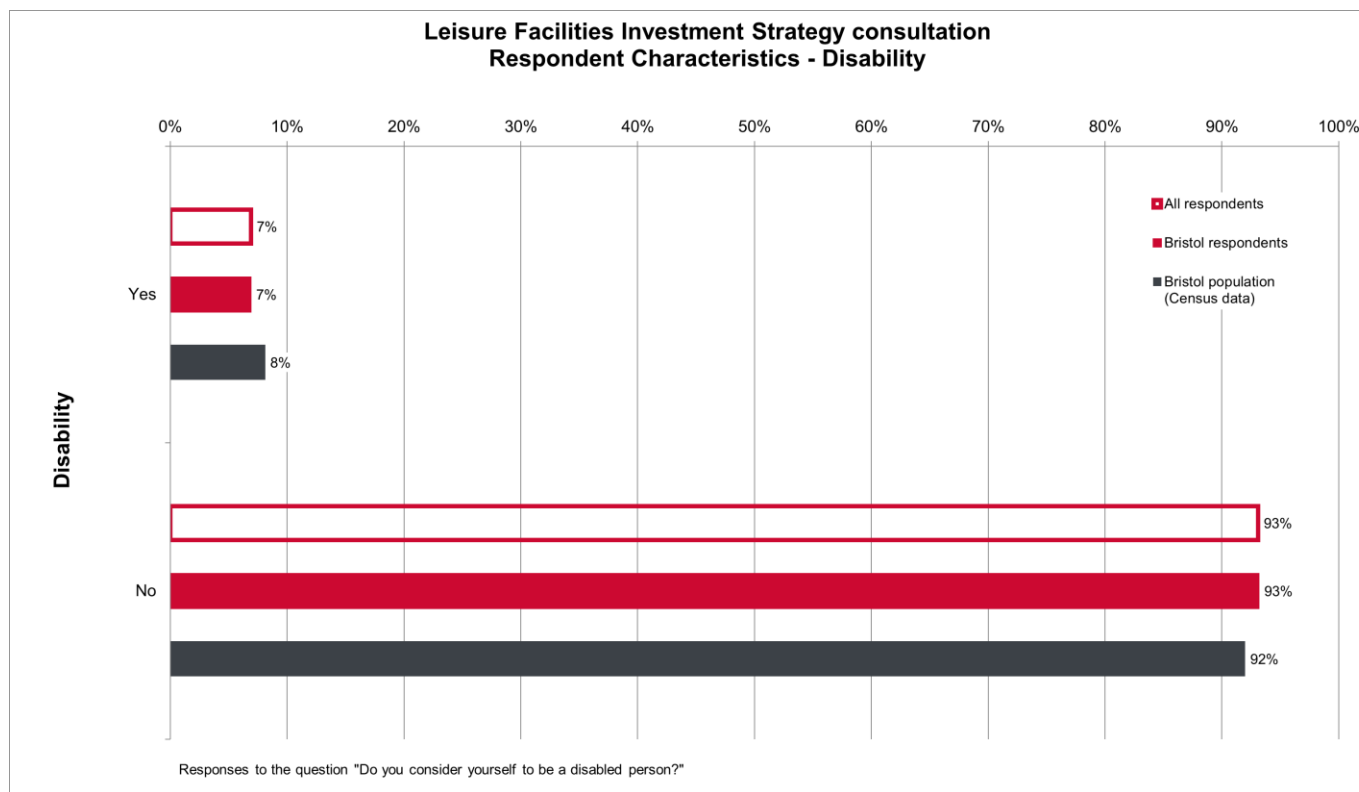


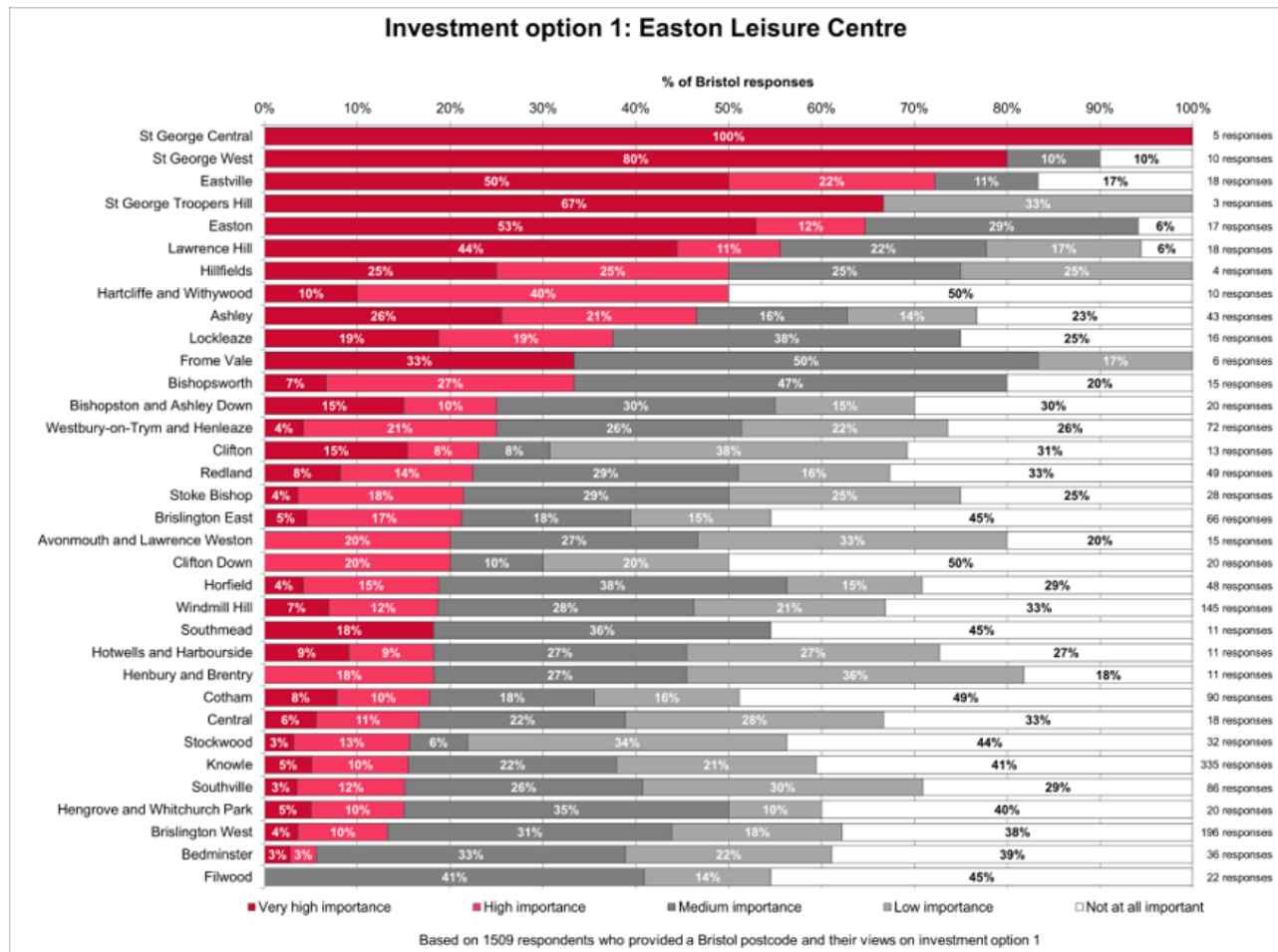
Figure 4 – Disability



The consultation illustrates that people are interested in their local facilities and that some communities are less likely to engage in public consultation meaning that the response is not fully representative of the whole population. The postcode data shows us very clearly that people value investment in their own communities. For example, for the option to invest in Easton Leisure Centre, respondents in St George Central, St George West, Eastville, Trooper's Hill, and Easton all placed a high level of importance in this option. Similar local responses can be seen on the other two investment options and this localised response can also be seen in relation to the proposed transfer or closure of Jubilee and Kingsdown.

OPTION 1: Easton Leisure Centre - Remodel within the current building footprint and limiting this to dry-side areas only. There is no increase in the size of the current pool area and instead, a focus is placed on a remodelling of the dry-side areas of the centre (sports hall, gym, reception area). This option results in a new and larger health and fitness suite, including a dedicated female-only area. The ground floor allows for additional community uses of the facility.

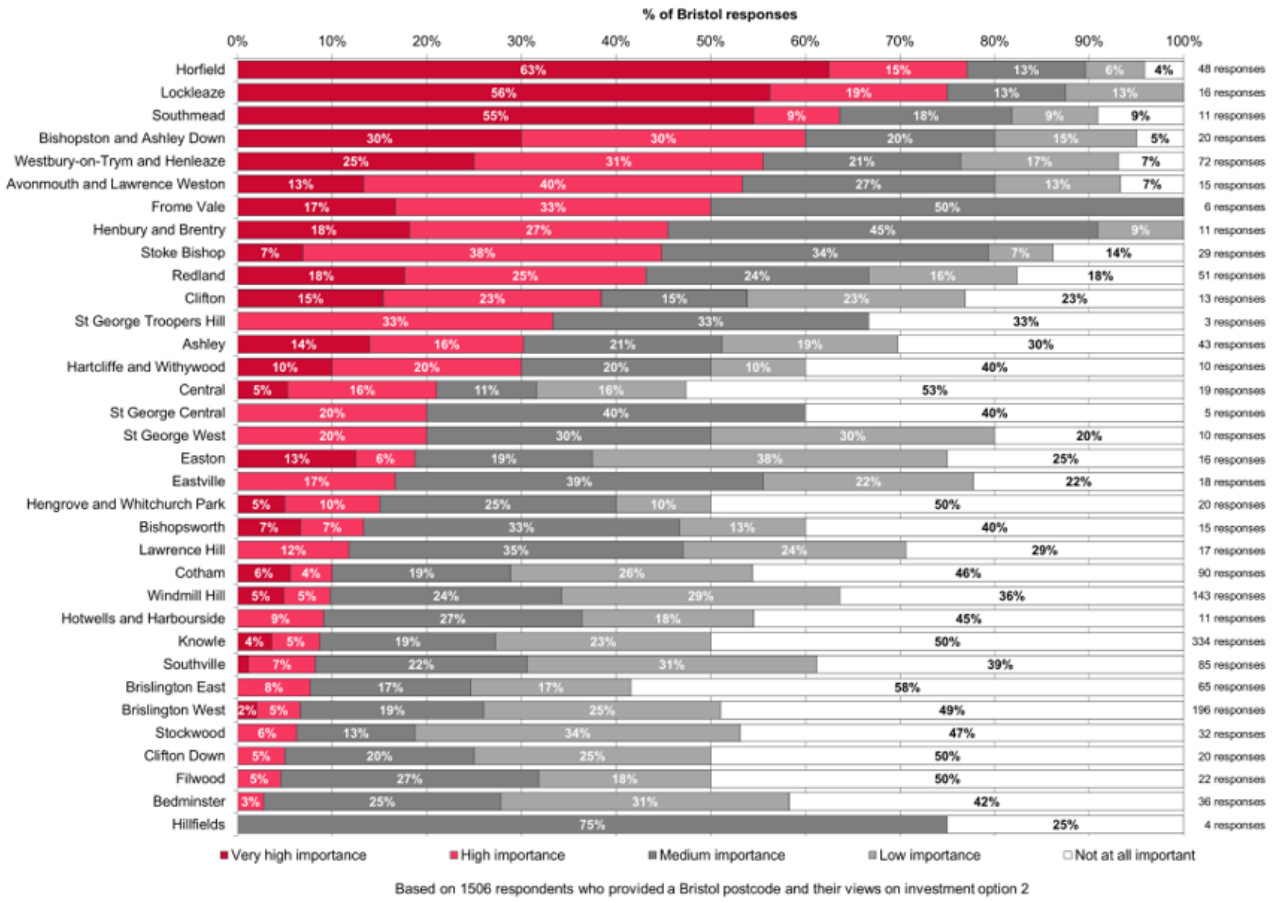
Responses to the option to invest in Easton Leisure Centre shown by ward.



OPTION 2: Horfield Leisure Centre - 2-storey extension to fitness gym (up to 80 additional stations) and provision of 2 new group exercise studios. No other investment included in this option

Responses to the option to invest in Horfield Leisure Centre shown by ward.

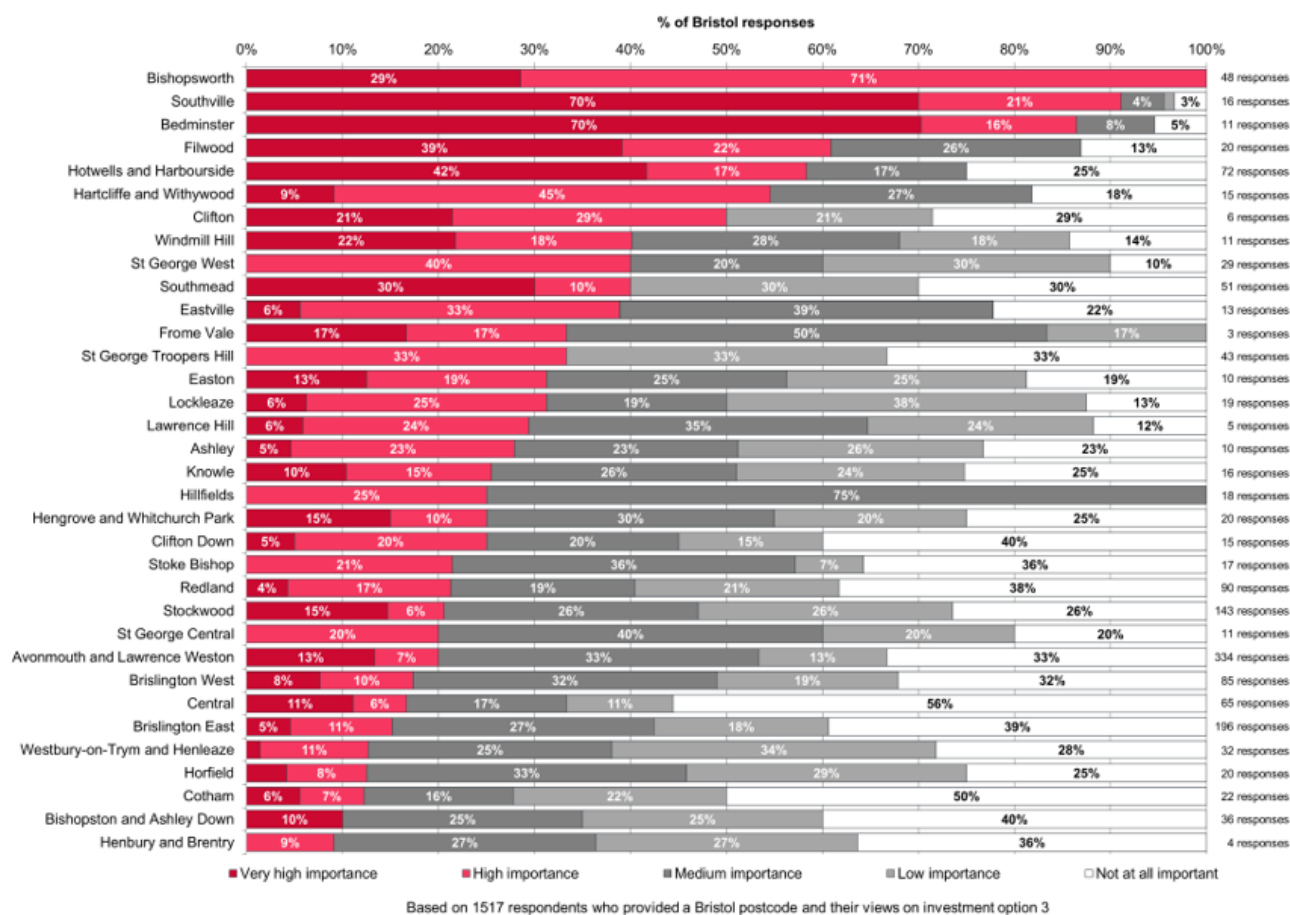
Investment option 2: Horfield Leisure Centre



OPTION 3 Bristol South Pool - A basic refurbishment which would provide some plant improvement and replacement and general cosmetic and condition improvements to customer facing areas.

Responses to the option to invest in Bristol South Swimming Pool shown by ward.

Investment option 3: Bristol South Pool



Although the highest number of respondents to the consultation use Jubilee swimming pool and Kingsdown Sports Centre, we know from the data that we collect from the Leisure Operator that this does not reflect the actual usage proportions in our Leisure Facilities and, again, reflects the local interest in leisure facilities.

A Community Asset Transfer process is underway in respect of Jubilee Swimming Pool.

A number of organisations have expressed an early interest in running Kingsdown Sports Centre.

An encouraging 62% of respondents indicated that it is important for exercise classes to take part in their local park, endorsing the 'Active Communities approach which will encourage the leisure operator appointed following the procurement exercise to provide activities in the local communities as well as in the leisure facilities.

64% of all responses were from women and 36% were from men. 0.2% were from people who identified as 'other'. These percentages exclude the 5% of respondents who answered 'prefer not to say'.

4% of respondents identified as bisexual, 2% as a gay man, 2% as a gay woman or lesbian and 0.7% as other. 0.1% had undergone gender reassignment. 3% of respondents were pregnant and 0.1% were refugees or asylum seekers.

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 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.

The public consultation closed in November and the final report will be available for publication with the with the report to Cabinet in February 2022. The Leisure Facilities Investment Strategy will be informed by the public consultation, and this will, in turn, inform the Procurement Strategy for the new contract to run the leisure centres.

We are using the information from the consultation strategy to feed into the Service Specification for the new leisure contract, working with colleagues from across the council for advice and assistance to ensure that minority groups, and those whose voices were not heard in the public consultation are able to feed into the service spec.

We will work with the Mayoral Working Group for Participation in Sport and Physical Activity, which has the remit to be the voice of physical activity in the city. We will engage with Access Sport – a disability organisation with which we have a partnership agreement who will advise us on the views of the disabled community. We will also liaise with colleagues in CYPs (Children and Young Peoples Services) and those who work with refugees and travellers and vehicle dwellers. We are speaking with Family Support and Liaison and with our colleagues in the community team who are advising us which groups to speak with to ensure the voice of the Black and Minority Ethnic community is included.

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 was 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 was 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) was sought. We

offered the consultation document in accessible formats for those who asked, and information leaflets were available in Leisure centres and libraries across the city.

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 are 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 reaching out to under-represented groups through colleagues in other services within the council to assist in the preparation of the service specification for the new leisure contract. We are preparing for specific services to be included and for concessionary prices to be available for groups for whom we have identified price as being a barrier.

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
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 that the pool is used by older people who prefer this facility. In fact, 21% of the respondents to the consultation were over 55 years.
Mitigations:	Support is being given to the 'Friends Of' group at Jubilee Pool to assist with their application for a Community Asset Transfer of the Pool. 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 (West of

	England Combined Authority) to ensure that there is sufficient public transport to alternative facilities.
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 people who are physically disabled 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
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 checked="" 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.

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:

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:

In addition to the improvements that are proposed for the Leisure Centres, the proposed women only provision at Easton Leisure Centre should contribute significantly to the engagement of women and girls from the surrounding community which is one with high levels of deprivation, physical activity, and cultural appropriateness.

The Leisure Procurement Strategy also provides for a new leisure operator to reach out to and engage with communities outside of the leisure centres and swimming pools, to take physical activity opportunities into those communities who are not currently users of the leisure facilities.

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
We have identified equality groups who have not responded to the consultation. We will seek their views further to support us create a specification working with the council's community development team to do so.	Jacq Abraham	30 th April 2022

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 are using the information from the public consultation to inform the service specification for the new contract, in addition to seeking the views of underrepresented groups where we know we have a gap.

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.

Equality and Inclusion Team Review: Reviewed by the Equality and Inclusion Team	Director Sign-Off: Christina Gray, Director of Communities and Public Health
Date: 24/12/2021	Date: 14/1/2022

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.