

Equality Impact Assessment / Equality Analysis

Title of service or policy	Swimming Pool Provision in Bath and North East Somerset
Name of directorate and service	Place, Environmental Services
Name and role of officers completing the EIA	Martin Pellow
Date of assessment	Oct 2017 (reviewed 24/9/20)

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 different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version (including the action plan section) being published on the Council’s and NHS Bath and North East Somerset’s websites.

1. Identify the aims of the policy or service and how it is implemented.		
	Key questions	Answers / Notes
1.1	Briefly describe purpose of the service/policy e.g <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	Greenwich Leisure Ltd is contracted by Bath and North East Somerset Council from July 2015 for 20 years. Responsibility for the implementation of the policy sits with both the Council and GLL. The schedule outputs detail the expected outcomes with regard to equalities. The contract is monitored by the Council; The Contract Manager inspects the facilities on a monthly basis to ensure that the contract outputs are adhered to.
1.2	Provide brief details of the scope of the policy or service being reviewed, for example: <ul style="list-style-type: none"> ● Is it a new service/policy or review of an existing one? ● Is it a national requirement?). ● How much room for review is there? 	The Scope of the policy is effectively the contract which runs from 1st July 2015 until 30th June 2035
1.3	Do the aims of this policy link to or conflict with any other policies of the Council?	No

2. Consideration of available data, research and information

Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources:

- **Demographic** data and other statistics, including census findings
- Recent **research** findings (local and national)
- Results from **consultation or engagement** you have undertaken
- Service user **monitoring data** (including ethnicity, gender, disability, religion/belief, sexual orientation and age)
- Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations
- Analysis of records of enquiries about your service, or **complaints** or **compliments** about them
- Recommendations of **external inspections** or audit reports

	Key questions	Data, research and information that you can refer to
2.1	What is the equalities profile of the team delivering the service/policy?	<p>The equalities profile of the staff delivering the service for the contract (all sites) is as follows:</p> <p>The makeup of the staff broadly reflects the local demographics</p> <p>This information is obtained through staff completing an Equal Opportunity Monitoring form upon joining the company</p>
2.2	What equalities training have staff received?	<p>All managers and supervisors are expected to actively promote equality of opportunity and awareness of diversity issues in their own area of responsibility.</p> <p>Management consult with relevant user groups on issues they may raise.</p> <p>Relevant staff receive disability awareness training; pool hoist training and training on ramp access for disabled users. Accessibility issues are discussed at General Manager's meetings and filtered down to Duty</p>

		<p>Manager and shift meetings.</p> <p>New staff members are encouraged to attend a GLL Equality and Diversity workshop.</p>
2.3	What is the equalities profile of service users?	<p>Male 46.1% Female 49.1% Unknown 4.9% Disabled 0.8%</p> <p>Ethnicity (2016) Asian 4.6% Black 0.7% Mixed 1.0% Other 0.1% White 93.7%</p> <p>Average of 35,322 pool users per month across partnership (2016) (figures based upon membership data)</p> <p>Sample of data collection shown in appendix</p>
2.4	What other data do you have in terms of service users or staff? (e.g. results of customer satisfaction surveys, consultation findings). Are there any gaps?	Customer Satisfaction Surveys, membership application captures the data to generate the KPI's. Customer Panel meetings, Access audits, Quarterly review of programming.
2.5	What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	<p>Consultation with all swimming groups conducted for the refurbishment plans.</p> <p>Regular warm water swimming group views have been considered.</p>
2.6	If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	Customer survey to be conducted annually as part of benchmarking process
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:	

	<ul style="list-style-type: none"> ● Meets any particular needs of equalities groups or helps promote equality in some way. ● Could have a negative or adverse impact for any of the equalities groups ● 		
		Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1	Gender – identify the impact/potential impact of the policy on women and men.	<p>No gender bias in marketing demonstrated by the KPI's.</p> <p>Clothing policy: T-shirt while swimming and towels on poolside.</p> <p>Children under 8 when supervised can use either changing room</p> <p>Balanced programme provides an opportunity for all.</p> <p>Female only swimming classes –This Girl can Swim</p> <p>Changing village with cubicles and separate male & female showers</p>	
3.2	Pregnancy and maternity	<p>Female only swimming classes –This Girl can Swim</p> <p>Low intensity classes in pool – aquafit</p> <p>T-shirt can be worn while swimming</p> <p>Keynsham Leisure Centre hold a weekly warm water pre-school session, with a poolside facilitator, on Thursday mornings.</p>	

3.3	Transgender – – identify the impact/potential impact of the policy on transgender people	At Bath Sport and Leisure Centre and Keynsham Leisure Centre changing village approach produces a positive impact for trans people, in that it “allows male, female and transgender into a mixed change area with separate cubicles”.	
3.4	Disability - identify the impact/potential impact of the policy on disabled people (ensure consideration both physical and mental impairments)	<p>By the end of 2018, warm water swimming will be provided in teaching pools (30-32 degrees) in Bath and Keynsham Centres. Teaching pool warm water facility will be available for public use and for groups to book including groups of disabled people.</p> <p>Continue to heat the main pool at Bath Sports and Leisure Centre to 30°C on Thursday mornings as per the current arrangements. Review afternoon usage in the light of the new provision of the teaching pools.</p> <p>Disabled access to Bath and Keynsham Leisure Centres and in particular the pools will be improved as part of the refurbishment works.</p> <p>Concession pricing policy Carers can attend activities for free After school club for people with disabilities Mencap swimming session Hoists and beds available</p> <p>GLL host Keynsham Seals disability swimming club at Keynsham for a</p>	<p>Depth of teaching pools will be 90cm-1m which will be suitable for children to learn to swim in a safe depth. This depth will also be suitable and safe for disabled children and for disabled adults supported by carers in the water. This facility is in addition to the heating of the main pool at Bath Sports and Leisure Centre.</p> <p>Thermae Bath Spa management confirmed that a discount of 50% applies to any guest who is a blue badge holder/registered disabled.</p> <p>The Council have explored the request for a deeper warm water pool to be provided at the Bath Leisure Centre, and have considered the proposals that have been put forward. However the proposals are not considered to be feasible on the grounds of deliverability and cost. See recommendations to CTE panel 11 January 2017.</p> <p>In considering what adjustments are reasonable for the Council to make - consideration was given to the users of</p>

		discounted rate	<p>the facility and how many would require warmer water at a greater depth than that provided by the new Learning Pools. Consideration was given to the impact that a deeper pool would have on current and potential users, the safety considerations, the costs and practicality of providing these facilities.</p> <p>As detailed in the report - the Council considers that the provision of these facilities constitutes a reasonable adjustment based upon the respective needs of the core user and the needs identified by the WWISE group while maximising the use for all users and minimising the risks to safety of users, capital and revenue impacts and deterioration of premises that operating a permanent dedicated warm water facility would entail.</p>
3.5	Age – identify the impact/potential impact of the policy on different age groups	<p>Concession pricing policy</p> <p>no charge for under 3's</p> <p>Club offer for over 60 will include swim option</p> <p>Keynsham Leisure Centre hold a weekly warm water 50 + session on Thursday mornings</p>	
3.6	Race – identify the impact/potential impact on different black and minority ethnic groups	<p>Usage profile in line with demographics</p> <p>Use of a wide range of promotional</p>	

		images	
		Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.6	Sexual orientation - identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	Use of neutral language in membership application forms. GLL Marketing is carefully designed to appeal to a cross section of the community including customers with different sexual orientations.	
3.7	Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	Yes	
3.8	Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	(Host Indian weddings in the Pavilion) Clothing policy: T-shirt while swimming and towels on poolside.	
3.9	Socio-economically disadvantaged* – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).	Concession pricing GLL work with the following organisations to provide free or reduced price access to their facilities: Carers Centre Bath Rugby Foundation St Philip and St James Church Bath Mencap Curo Housing Association Youth offending Team Youth Services Exercise on referral prices Swimming offered for a pound in various half term promotions.	

		Free swimming sessions for Bath Rugby Foundation's Hitz programme	
3.10	Rural communities* – identify the impact / potential impact on people living in rural communities	Pools are accessible by public transport and marketing of swim programme is across the whole of Bath and North East Somerset area.	

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.

4. Bath and North East Somerset Council & NHS B&NES 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
Pricing is a potential barrier to accessing service	Continued review on annual basis		Martin Pellow	Jan
GLL offer a varied and wide ranging programme to appeal to large range of people	Programme to be reviewed annually		Martin Pellow	Monthly reports

National physical activity data shows that women and ethnic minorities tend to be less active and under-represented in taking up physical activity opportunities	Specific programmes in place in monitored to target these groups		Martin Pellow	Quarterly reports

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 Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by: Martin Shields

(Divisional Director or nominated senior officer)

Date: 4/1/17

Reviewed 24/9/20

I have considered the original EIA and am satisfied that our operating model continues to deliver on the actions outlined.

Facilities remain available to support groups with protected characteristics to access swim facilities. The newly refurbished pools in Keynsham, with improved change facilities, opened during the first half of 2020.

Mandy Bishop. Director of Environment

Appendix

Below is a screenshot of the ethnic origin question asked when a customer takes out a new membership.

The screenshot displays the 'Legend Club Management System' interface. The main window is titled 'New Member Wizard' and is currently on the 'Personal Details' step. The wizard prompts the user to collect personal details for a prospective member, noting that red asterisks denote mandatory fields. The 'Date of Birth' field is set to 01/11/1969 and is marked as mandatory. The 'Ethnic Origin' dropdown menu is open, showing a list of options: Black/British Black(African), Antipodean, Arab, Bangladeshi, Black African, Black Caribbean, Black Other, Black/British Black(African), and Black/British Black(Caribbean). The 'Black/British Black(African)' option is currently selected. The wizard also includes fields for Gender (Male/Female), Marital Status, Employee Details, Occupation, and Employer. At the bottom of the wizard, there are fields for Name, Number, and Check In Note, along with navigation buttons for '< Previous', 'Next >', and 'Finish'. The background shows a Windows desktop with various icons and a taskbar at the bottom.