

Equality & Poverty Impact Assessment 00426 (Version 1)

SECTION ONE: ESSENTIAL INFORMATION

Service & Division:	Place Services Growth, Planning & Climate	Lead Officer Name:	Carol Whyte
		Team:	Sport & Leisure
		Tel:	07872828983
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Proposal:	SPR - Proposed Closure of Bo'ness Recreation Centre.	Reference No:	

What is the Proposal?	Budget & Other Financial Decision	Policy (New or Change)	HR Policy & Practice	Change to Service Delivery / Service Design
	Yes	No	No	Yes

Who does the Proposal affect?	Service Users	Members of the Public	Employees	Job Applicants
	Yes	Yes	Yes	Yes

Other, please specify:	<p>Bo'ness Recreation Social Club access to facilities located within BRC.</p> <p>Various sports clubs will be affected by the proposal.</p> <p>Parents and guardians of children participating in activities will be affected.</p> <p>Separate EPIA required for employees effected by the proposed closure.</p> <p>Potential impact on candidates applying for jobs in a venue that has been identified for closures. This could negatively impact the delivery of sports development classes in the interim period.</p>
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Identify the main aims and projected outcome of this proposal (please add date of each update):

10/02/2023	Review operating model of Bo'ness Recreation Centre to determine the position for the council going forward. The aim is to close the venue and relocate services to Bo'ness Academy.
20/02/2023	Gap in customer information to measure against protected characteristics.
20/02/2023	Further engagement required with H & F, Active Forth members and PAYG customers.
20/02/2023	Gap in Bo'ness Recreation Social Club usage. Should BRC close there is no alternative location identified to relocate to.

Identify the main aims and projected outcome of this proposal (please add date of each update):

06/03/2023	<p>Mitigate closure by approving investment for Bo'ness Academy to make it fit for purpose for public use,</p> <p>Agree public access arrangements during the school day and out with school hours to relocate BRC customers and staff.</p> <p>Investment required for adoptions to the school estate to make the school fit for public use and meet customer expectations.</p>
10/01/2024	<p>Social Club has intimated plans to relocate to an alternative venue.</p> <p>Performance information updated to reflect 2022/23 actuals and 2023/24 projections.</p> <p>Elected Members agreed to move BRC from phase 2 into phase 3 of the SPR at the December 23 Council meeting. Director of Place Services will provide an update to Falkirk Council on Bo'ness Recreation Centre at the January 2024 Council meeting.</p> <p>Mitigation remains relocating activities where possible to Bo'ness Academy and alternative council venues.</p>

SECTION TWO: FINANCIAL INFORMATION

For budget changes ONLY please include information below:			Benchmark, e.g. Scottish Average
Current spend on this service (£'0000s)	Total:	£903,330 net position (excluding central charges)	2023 projected year end position.
		£1,475,464	Expenditure 2022/23 actual year end position.
		£1,441,110	Expenditure 2023/24 budgeted year end position
		£1,481,980	Expenditure 2023/24 projected year end position.
Reduction to this service budget (£'0000s)	Per Annum:		
Increase to this service budget (£'000s)	Per Annum:		
If this is a change to a charge or concession please complete.	Current Annual Income Total:		
	Expected Annual Income Total:		
If this is a budget decision, when will the saving be achieved?	Start Date:	01/04/2024	
	End Date (if any):		

SECTION THREE: EVIDENCE

Please include any evidence or relevant information that has influenced the decisions contained in this EPIA. (This could include demographic profiles; audits; research; health needs assessments; national guidance or legislative requirements and how this relates to the protected characteristic groups.)

A - Quantitative Evidence

This is evidence which is numerical and should include the number people who use the service and the number of people from the protected characteristic groups who might be affected by changes to the service.

Protected characteristics - poverty, disability, sex, age

2022/23 projected year end total admissions = 114,878.

2021/22 total admissions = 80,766 visits

General activity admissions = 53,857 (67%) split across the following categories: adult 26,685 (58%), Junior 20,865 (90%) Go Card 4,307 (45%). Gender, age and postcode are not captured for general admissions.

Health & fitness admissions = 26,909 (33%). split across the following categories: adult 19,283 (42%), junior 2,273 (10%), Go Card 5,353 (55%)

As at 09/02/2023, live membership total signed up at BRC is 729. The gender split is 50% male, 50% female.

Go Card is a concessionary card which can be used throughout leisure and culture facilities for free or discounted access to a range of services and activities.

% members with Go Card

Adult 9%

Young Adults (16/17 years) 3%

57 Active Forth Programme Members.

8% of the overall Bo'ness membership base.

2022/23 Sports Development Classes to end Q3 = 1,009 admissions

Gender split - 43% female, 49% male, 8% not specified.

77% of participants in the sports development programme are aged under 12 years. 23% are aged under 16 years.

JAN 2024 Update

2022/23 Actual year end position = 127,379 admissions.

2023/24 Projected year end admissions = 145,546

Membership as at end Q3 = 824

Adult =42%

Active Forth = 5%

Go Card = 33%

Teens = 20%

2023 /24 Sports Development Classes to end Q3 = 3,081 admissions

Gender split - 6% female, 7% male, 87% not specified.

88% of participants in sports development programme are aged under 12 years.

B - Qualitative Evidence

This is data which describes the effect or impact of a change on a group of people, e.g. some information provided as part of performance reporting.

Social - case studies; personal / group feedback / other

Council carried out a series of public consultation meetings and online surveys for communities to provide feedback on SPR proposal. Email correspondence was also accepted.

11 emails received.

Poverty - 2 responses - Negative impact on low income families, concern over increased activity charges, cost to travel to an alternative venue, potential to remove Go card concessionary pricing, physical health and social isolation.

Age - 3 responses - Negative impact on Go car users, young people and Gymnastics club

Age & Disability - 4 responses - Negative impact on health, social isolation, proposed access to Bo'ness Academy will restrict access.

Disability - 1 response - Ability to access other venues and location

Gender - 1 response - Negative impact on women aged 50+, lack of public transport to an alternative venue.

711 survey responses received from users of the facility (486), residents of the ward (185), on behalf of a community group / organisation (36), not answered (4)

Gender of responses received - female 477, male 214, not answered 18. other 2.

627 respondents stated they would be disproportionately affected by the SPR proposal for this venue.

The age profile of respondents

Under 16 years - 9 responses, 16 - 24 years - 22 responses, 25 - 44 years - 241 responses, 45 - 64 years - 308 responses, 65+ years - 113 responses, not answered - 18 responses.

The majority of the responses received did not select a protected characteristic when completing the survey.

Summary of comments received:

Negative impact on the loss of sport specific venue, health & wellbeing, people with disabilities having access to suitable adapted facilities, age discrimination against young people and the elderly, ability to travel to an alternative venue, public transport network, viability of accessing Bo'ness Academy or other schools, and lack of capacity in other venues for those that are able to travel were the most common concerns raised.

Summary of responses stating protected characteristics:

AGE - 108 responses, 36 state they have a physical or mental health condition expected to last longer than 12 months. Of the 108 responses, 72 are female, 33

male, 3 not answered. 65+ years received the most responses with 61, 45 - 64 years received 27 responses, all other age groups and not answered received less than 10 responses in each age group.

DISABILITY -55 responses, 46 state they have a physical or mental health condition expected to last longer than 12 months. Of the 55 responses, 40 are female, 14 male, 1 not answered. 45 - 64 years received the most responses with 24, closely followed by 25 - 44 years with 20 responses. Under 16 years is the only age category not to respond.

SEX - 29 responses, 7 state they have physical or mental health condition expected to last longer than 12 months. Of the 29 responses 26 are female, 2 male. 45 - 64 years received the most response with 14. all other age groups were represented receiving less than 10 responses in each age group.

ETHNICITY - 1 response received from a male, 45 - 64 years.

SEXUAL ORIENTATION - 5 responses received of which 3 are male, 2 female. Under 16 years and over 65+ are the only age categories with no responses.

PREGNANCY / MATERNITY - 4 responses received, 25 - 44 years

Increased travel, impact on health, suitability of alternative venues for young babies and affordability were the main concerns raised were this venue to close.

MARITAL STATUS - 10 responses, 1 state they have a physical or mental health condition expected to last longer than 12 months. Of the 10 responses 8 are female, 2 male. 25 - 44 years received the most responses with 6, 45 - 64 years and 65+ years receiving 2 responses each.

POVERTY - 15 responses, 10 state they have a physical or mental health condition expected to last longer than 12 months. Of the 15 responses, 10 are female, 3 male, 2 not answered. 25 - 44 years received the most responses with 8, the remaining age categories received 3 or less responses. Under 16 age category is the

only age group not to respond.

Best Judgement:	
Has best judgement been used in place of data/research/evidence?	No
Who provided the best judgement and what was this based on?	
What gaps in data / information were identified?	Gaps in customer information to measure against protected characteristics. No information on Bo'nness Recreation Social Club usage. Jan 24 Update - Admissions data does not identify the number of unique users or record protected characteristics.
Is further research necessary?	Yes
If NO, please state why.	

SECTION FOUR: ENGAGEMENT

Engagement with individuals or organisations affected by the policy or proposal must take place

Has the proposal / policy / project been subject to engagement or consultation with service users taking into account their protected characteristics and socio-economic status?	Yes	
If YES, please state who was engagement with.	Service users and the local community has the opportunity to feedback in a series of council led public engagement meetings or completing an online survey. Emails were also accepted.	
If NO engagement has been conducted, please state why.		
How was the engagement carried out?	What were the results from the engagement? Please list...	
Focus Group	No	
Survey	Yes	Council online survey for interested parties to provide feedback on SPR proposals. 711 Survey responses received from; users of the facility (486), resident of the ward (185), on behalf of a community group /organisation (36), not answered (4). 627 respondents stated they would be disproportionately affected by the SPR proposal for this venue.
Display / Exhibitions	No	
User Panels	No	
Public Event	Yes	Council officers carried out a series of public meetings across the council area enabling communities to feedback on the SPR proposals, including the closure of Bo'ness Recreation Centre.
Other: please specify	11 comments received to the SPR email - Gender - 1, Poverty - 2, Disability -1, Age & Disability -3, Age - 3 Customer survey carried out Jan - Feb 2023. Results due end March.	
Has the proposal / policy/ project been reviewed / changed as a result of the engagement?	No	
Have the results of the engagement been fed back to the consultees?	No	

Is further engagement recommended?

Yes

SECTION FIVE: ASSESSING THE IMPACT

Equality Protected Characteristics: What will the impact of implementing this proposal be on people who share characteristics protected by the Equality Act 2010 or are likely to be affected by the proposal / policy / project? This section allows you to consider other impacts, e.g. poverty, health inequalities, community justice, carers etc.

Protected Characteristic	Neutral Impact	Positive Impact	Negative Impact	Please provide evidence of the impact on this protected characteristic.
Age			✓	Negative impact on physical and mental health, social interaction, ability to travel to an alternative venue and access public transport were the most common concerns raised. Concerns over access and suitability of Bo'ness Academy as an alternative venue, affordability, lack of amenities for new housing, assessment of public engagement meetings and the councils decision making process were also noted.
Disability			✓	Negative impact on physical health and transport were the most common concerns raised closely followed mental health. Concerns over mental health, affordability, social isolation and suitable disabled facilities being available at alternative venue were also noted.
Sex			✓	Negative impact on young females participation in sport, physical & mental health and social interaction were the most common concerns raised were the venue to close with no suitable alternative. Concerns over travel and affordability were also noted.
Ethnicity			✓	Concern that there is no alternative venue within the council area with facilities to meet the needs of his sport.
Religion / Belief / non-Belief				
Sexual Orientation			✓	The main concern for for this groups is access to travel should the venue close and no suitable alternative venue be available locally.
Transgender				
Pregnancy / Maternity			✓	Increased travel, impact on health, suitability of alternative venues for young babies and affordability were the main concerns raised were this venue to close.

Public Sector Equality Duty: Scottish Public Authorities must have 'due regard' to the need to eliminate unlawful discrimination, advance quality of opportunity and foster good relations. Scottish specific duties include:

				interaction, the outcome of the council public engagement meetings and the councils decision making process were also noted.
Poverty			✓	The council ability to meet the Scottish Government's Health and Physical Activity Plans, World Health Organisation Objectives and its own plans for health and wellbeing in the council plan and the impact on SIMD are the most common concerns for this group. Concerns over public transport, additional costs and impact on the general health of the community were also noted.
Care Experienced				
Other, health, community justice, carers etc.				
Risk (Identify other risks associated with this change)				

	Evidence of Due Regard
Eliminate Unlawful Discrimination (harassment, victimisation and other prohibited conduct):	The proposed mitigation that service transfer to the local high school will ensure that services to continue to be available to all. The new proposed venue will offer improved accessibility.
Advance Equality of Opportunity:	As above, the proposed mitigation that service transfer to the local high school will ensure that services to continue to be available to all. The new proposed venue will offer improved accessibility.
Foster Good Relations (promoting understanding and reducing prejudice):	Community engagement was undertaken to ensure the views of all interested parties were considered.

SECTION SIX: PARTNERS / OTHER STAKEHOLDERS

Which sectors are likely to have an interest in or be affected by the proposal / policy / project?		Describe the interest / affect.
Business	Yes	Impact on the the local economy. Local businesses operating out of the venue. Public transport infrastructure. Potential loss of income to council from members opting to cancel membership.
Councils	No	
Education Sector	No	
Fire	No	
NHS	Yes	Impact on the delivery of Active Forth programme.
Integration Joint Board	No	
Police	No	
Third Sector	No	
Other(s): please list and describe the nature of the relationship / impact.		

SECTION SEVEN: ACTION PLANNING

Mitigating Actions: If you have identified impacts on protected characteristic groups in Section 5 please summarise these in the table below detailing the actions you are taking to mitigate or support this impact. If you are not taking any action to support or mitigate the impact you should complete the No Mitigating Actions section below instead.

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Age	All age categories	<p>Mitigate against closure by relocating activities to Bo'ness Academy</p> <p>Develop action plan to relocate activities and staff. Public access arrangements during the school day and out with school hours are key to the success of proposed mitigation.</p> <p>Investment required for adaptations to the school estate to make the school fit for public use and meet customer expectations.</p> <p>Relocating activities will provide the community with a positive destination to participate in sport and deliver on the councils health & wellbeing objectives.</p> <p>Further analysis required on impact of closure or limited access to the school against protected characteristics for customers, clubs and the wider community.</p> <p>No mitigation to relocate Bo'ness Social Club.</p>	R Macaloney		Falkirk Plan

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Disability	Community	<p>Mitigate against closure by relocating activities to Bo'ness Academy</p> <p>Develop action plan to relocate activities and staff. Public access arrangements during the school day and out with school hours are key to the success of proposed mitigation.</p> <p>Investment required for adaptations to the school estate to make the school fit for public use and meet customer expectations.</p> <p>Retaining the venue will provide the community with a positive destination to participate in sport and deliver on the councils health & wellbeing objectives.</p> <p>Further analysis required on impact of closure or limited access to the school against protected characteristics for customers, clubs and the wider community.</p> <p>No mitigation to relocate Bo'ness Social Club.</p>	R Macaloney		Falkirk Plan

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Poverty	Community SIMD	<p>Mitigate against closure by relocating activities to Bo'ness Academy</p> <p>Develop action plan to relocate activities and staff. Public access arrangements during the school day and out with school hours are key to the success of proposed mitigation.</p> <p>Investment required for adaptations to the school estate to make the school fit for public use and meet customer expectations.</p> <p>Retaining the venue will provide the community with a positive destination to participate in sport and deliver on the councils health & wellbeing objectives.</p> <p>Further analysis required on impact of closure or limited access to the school against protected characteristics for customers, clubs and the wider community.</p> <p>No mitigation to relocate Bo'ness Social Club.</p>	R Macaloney		Falkirk Plan

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Sex	All	<p>Mitigate against closure by relocating activities to Bo'nness Academy</p> <p>Develop action plan to relocate activities and staff. Public access arrangements during the school day and out with school hours are key to the success of proposed mitigation.</p> <p>Investment required for adaptations to the school estate to make the school fit for public use and meet customer expectations.</p> <p>Retaining the venue will provide the community with a positive destination to participate in sport and deliver on the councils health & wellbeing objectives.</p> <p>Further analysis required on impact of closure or limited access to the school against protected characteristics for customers, clubs and the wider community.</p> <p>No mitigation to relocate Bo'nness Social Club.</p>	R Macaloney		Falkirk Plan

No Mitigating Actions

Please explain why you do not need to take any action to mitigate or support the impact of your proposals.

Are actions being reported to Members?

Yes

If yes when and how ?

Council meeting 29th March 2023 SPR update to elected members.

Council meeting 31st March 2024 Bo'ness Recreation Centre update report presented to elected members following the motion passed at December 2023 Council Meeting.

SECTION EIGHT: ASSESSMENT OUTCOME

Only one of following statements best matches your assessment of this proposal / policy / project. Please select one and provide your reasons.

No major change required	No	
The proposal has to be adjusted to reduce impact on protected characteristic groups	No	
Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups	Yes	Mitigate closure by approving investment for Bo'ness Academy to make it fit for purpose for public use, including enhanced health and fitness offering. Agree public access arrangement to Bo'ness Academy.
Stop the proposal as it is potentially in breach of equality legislation	No	

SECTION NINE: LEAD OFFICER SIGN OFF

Lead Officer:

Signature:	<i>Carol Whyte</i>	Date:	15/01/2024
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SECTION TEN: EPIA TASK GROUP ONLY

OVERALL ASSESSMENT OF EPIA:	Has the EPIA demonstrated the use of data, appropriate engagement, identified mitigating actions as well as ownership and appropriate review of actions to confidently demonstrate compliance with the general and public sector equality duties?	Yes
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ASSESSMENT FINDINGS	There is information provided that shows the impacts on a wide range of protected characteristics - this reflects the usage of the facility.	
If YES, use this box to highlight evidence in support of the assessment of the EPIA		
If NO, use this box to highlight actions needed to improve the EPIA		

Where adverse impact on diverse communities has been identified and it is intended to continue with the proposal / policy / project, has justification for continuing <u>without making changes been made</u>?	Yes	If YES, please describe: It is proposed as a mitigation that the services provided in the sports centre would be provided in the local high school. The impact of closure will continue to be monitored as detailed proposals for mitigation are developed.
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LEVEL OF IMPACT: The EPIA Task Group has agreed the following level of impact on the protected characteristic groups highlighted within the EPIA

LEVEL		COMMENTS
HIGH	Yes / No	
MEDIUM	Yes	Medium impact identified. Whilst negative impacts have been identified as arising from the proposed closure, these will be mitigated by the planned transition of services to the nearby Bo'nness Academy. However, there will remain groups who are unable to be fully accommodated within the proposed alternative venue.
LOW	Yes / No	

SECTION ELEVEN: CHIEF OFFICER SIGN OFF

Director / Head of Service:			
Signature:	<i>Malcolm Bennie</i>	Date:	19/01/2024