

Equality & Poverty Impact Assessment 00416 (Version 1)

SECTION ONE: ESSENTIAL INFORMATION

Service & Division:	Place Services Growth, Planning & Climate	Lead Officer Name:	Carol Whyte
		Team:	Sport & Leisure
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Proposal:	SPR - Stenhousemuir Gym	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>Separate EPIA required for employees effected by the proposal. Potential impact on candidates applying for jobs in a venue that has been identified within SPR. This could negatively impact the delivery of health and well being agenda.</p>
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Identify the main aims and projected outcome of this proposal (please add date of each update):

07/02/2023	Review operating model of Stenhousemuir Gym to determine options for the council going forward. The aim is to identify a net zero deficit with no financial risk to the council.
20/02/2023	Gaps in information on pay as you go customers against protected characteristics.
20/02/2023	Further engagement required with H & F, Active Forth members and PAYG customers
06/03/2023	SPR update to elected member on 29th March 2023 is proposing to close the venue. The S & L team recommend mitigation of commercial performance improvement as the appropriate course of action for Stenhousemuir Gym to avoid closure of the venue.
15/01/2024	SPR update report to elected members will advise of new business approaches being explored for this venue to make it financially viable. There is no further EPIA impact at this time.

SECTION TWO: FINANCIAL INFORMATION

For budget changes ONLY please include information below:			Benchmark, e.g. Scottish Average
Current spend on this service (£'0000s)	Total:	£119,060 net position (excluding central charges)	2023 projected year end position.
		£96,769 net position	2022/23 Actual 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:	01/04/2025	
	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 - disability, age, poverty, sex

2021 /22 admissions = 85,562 visits per annum. Visits include members signed up at other council venues.

2022/23 yearend projected admissions = 86,800 visits

As at 09/02/2023, the live membership total signed up at Stenhousemuir Gym is 1,900 members.

Gender split 51% female and 49% male.

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 13%

Young Adult (16/17 years) 8%

Active Forth

The Active forth programme is Falkirk exercise referral programme it provides guidance and support to inactive individuals with health conditions to help them increase physical activity and understand how best to exercise for them while managing the specifics needs of their health and wellbeing. The programme aims to assist people into independent exercise over a 6 month period. Working closely with NHS health providers the programme is a key link into community-based exercise to improve health and wellbeing.

78 Active Forth Programme Members.

4% of the overall Stenhousemuir Gym membership base.

Jan2024 Update

2022/23 ACTUAL admissions = 85,607

2023/24 year end projected admissions = 82,000

As at 15/01/24 Members =1,798

% of membership by category (Adult = 64%, Active Forth = 6%, Go Card = 11%, Teen = 19%)

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.

4 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 of Go Card concessionary pricing and negative impact on mental and physical health.

Disability - 1 response - Impact on disadvantaged groups using the gym for rehabilitation.

Gender - Female predominant provider of childcare with limited time to travel for fitness.

266 Survey responses received from users of the facility (215), resident of the ward (49), on behalf of a community group /organisation (1), not answered (1).

Gender of responses received - female 174, male 85, not answered 6.

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

The age profile of respondents

Under 16 - 3 responses, 16 - 24 years -13 responses, 25 - 44 years - 103 responses, 45- 64 years - 121 responses. 65+ years - 22 responses, not answered - 4 responses

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

Summary of comments received:

Negative impact on health & wellbeing, social engagement, people with disabilities having access to suitable adapted facilities, age discrimination, ability to travel to an alternative venue, public transport network, affordability, 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:

DISABILITY - 23 responses, 20 state they have a physical or mental health condition expected to last longer than 12 months. Of the 23 responses, 14 are female and 8 male, 1 not answered. 45 - 64 years received the most responses with 9, closely followed by 25 - 44 years with 8 responses. Under 16 years is the only age category not to respond.

Suitability of location and access to the venue, negative impact on health and wellbeing and the ability to travel to an alternative venue if it were to close were the most common concerns raised. Concerns over social engagement and affordability were also noted.

AGE - 22 responses, 9 state they have a physical or mental health condition expected to last longer than 12 months. Of the 22 responses, 14 are female and 7 male, 1 not answered. 45 - 64 years received the most responses with 10, closely followed by 65+ years with 7 responses, Under 16 years is the only age category not to respond.

Negative impact on physical health, recovery from medical conditions, mental health and general well being were the most common concerns raised were the venue to close. Concern over access, travel, affordability, social engagement were also noted.

SEX - 11 responses, 5 state they have a physical or mental health condition expected to last longer than 12 months. Of the 11 responses 9 are female and 2 male. 25 - 44 years received 8 responses and 45 - 64 years received the remaining 3 responses.

Suitability of location within the local community, ability to walk to venue and ability to travel to an alternate location was the most popular response received. Concerns over impact on general physical health, affordability, mental health and general wellbeing and social interaction were also noted.

MARITAL STATUS - 11 responses, 5 state they have a physical or mental health condition expected to last longer than 12 months. Of the 11 responses, 9 are female and 2 male. 45 - 64 years received 6 responses closely followed by 25 - 44 years with 5 responses.

Venue has a positive impact on the community and its ability to stay local by walking to or short travel to the gym, the venue is well used by all age groups encouraging physical activity and active lifestyle were the most common points noted. Concerns over physical health of the community, ability to travel to an alternative location and affordability were also noted.

POVERTY - 7 responses, 2 state they have a physical or mental health condition expected to last longer than 12 months. of the 7 responses 5 are female and 2 male. 16 - 24 years and 25 - 44 years received 2 responses and 45 - 64 years receiving 1 response.

Affordability and ability to travel to an alternative venue were the concerns raised were the venue to close. Concerns a different operating model, price structure and removal of Go Card concessionary pricing were also noted.

SEXUAL ORIENTATION - 6 responses, 5 state they have a physical or mental health condition expected to last longer than 12 months. Of the 6 responses 5 are female and 1 male. 3 recognise as Bi Sexual, 2 Gay / Lesbian, 1 Heterosexual. The 25 - 44 years and 45 - 64 years received 3 responses each.

Suitability of location and affordability were the most common responses were this venues to close. Concerns over mental health, social engagement and disability access were also noted.

PREGNANT / MATERNITY - 3 responses, received from females in the 25 - 44 years.

Suitability of location, ability to travel to an alternative venue, physical& mental health and affordability were the concerns raised were this venue to close.

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?	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 had the opportunity to feedback in a series of council led public engagement meetings or completing online surveys. Email correspondence was 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. 266 Survey responses received from; users of the facility (215), resident of the ward (49), on behalf of a community group /organisation (1), not answered (1). 213 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 Stenhousemuir Gym.
Other: please specify	Four comments received to the SPR email - Gender - 1, Poverty -2, Disability -1 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			✓	<p>See evidence in section 3 on split of age groups. Poverty, disability, health inequalities are the key characteristics identified.</p> <p>Further work required to understand the impacts on each age group should the venue close.</p>
Disability			✓	<p>See evidence in section 3 on Disability. Health inequalities, age and poverty are the key characteristics identified.</p> <p>Further work required to understand the impact on customers with disabilities, should the venue close.</p> <p>The Active forth programme is Falkirk exercise referral programme it provides guidance and support to inactive individuals with health conditions to help them increase physical activity and understand how best to exercise for them while managing the specifics needs of their health and wellbeing. The programme aims to assist people into independent exercise over a 6 month period. Working closely with NHS health providers the programme is a key link into community-based exercise to improve health and wellbeing.</p>

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:

				Further work required to understand the impact on customers should the venue close.
Ethnicity				
Religion / Belief / non-Belief				
Sexual Orientation			✓	See evidence in section 3 on Sexual Orientation . Health inequalities is the the key characteristics identified for this group. Further work required to understand the impact on customers should the venue close.
Transgender				
Pregnancy / Maternity			✓	See evidence in section 3 on Pregnancy / Maternity . Health inequalities is the the key area characteristics for this group. Further work required to understand the impact on customers should the venue close.
Marriage / Civil Partnership			✓	See evidence in section 3 on Marriage/ Civil Partnership . Health inequalities, disability and poverty the key characteristics identified for this group. Further work required to understand the impact on customers should the venue close.

Poverty			✓	<p>See evidence in section 3 on Poverty . Health inequalities, and disability are the key characteristics identified for this group.</p> <p>Further work required to understand the impact on income SIMD demographics, customers should the venue close.</p> <p>Go Card is a concessionary card which can be used through out leisure and culture facilities for free or discounted access to a range of services and activities.</p> <p>Concern over any change to the current operating model will see the Go Card concessionary scheme withdrawn.</p> <p>Concern over potential price increases and cost of travel will result in user no longer being able to afford health & fitness membership.</p>
Care Experienced				
Other, health, community justice, carers etc.				
Risk (Identify other risks associated with this change)	Young people do not have the opportunity to start early habits of physical activity that they carry on with them into later life.			
		Evidence of Due Regard		
Eliminate Unlawful Discrimination (harassment, victimisation and other prohibited conduct):				
Advance Equality of Opportunity:	Detailed information required to understand the impact to customers and the wider community against each of the protected characteristics. Admissions data does not identify the number of unique users or record protected characteristics.			

Foster Good Relations (promoting understanding and reducing prejudice):

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	<p>Limited capacity, if any, in Falkirk council venues being retained to accommodate displacement of members.</p> <p>Potential loss of income to council from members opting to cancel membership due to remaining council gyms being unable to meet their needs. Private gym operators benefiting from members opting to join their facilities instead of travelling to an alternative council venue.</p> <p>Mariner Centre car park is too small for its customer base at present with no capacity to accommodate additional users. Car parking issues could be addressed with the council carrying out a corporate landlord review of the parking restrictions put in place by neighbouring businesses.</p> <p>Potential impact to the local economy with service users no longer frequenting the retail park when attending the gym.</p> <p>Closure of the venue will impact on local businesses employees physical and mental health & wellbeing.</p>
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 through delivery of a commercial performance improvement plan.</p> <p>Develop action plan to increase income generation, reduce costs to achieve net zero subsidy.</p> <p>Retaining the venue will provide the community with a positive destination to participate in health & fitness and deliver on the councils health & wellbeing objectives.</p> <p>Further analysis required on impact of closure against protected characteristics on customers and the wider community.</p>	P Finnie R Macaloney		<p>Council Plan</p> <p>Supporting Stronger & Healthy Communities</p>

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Disability	Members Active Forth	<p>Mitigate against closure through delivery of a commercial performance improvement plan.</p> <p>Develop action plan to increase income generation, reduce costs to achieve net zero subsidy.</p> <p>Retaining the venue will provide the community with a positive destination to participate in health & fitness and deliver on the councils health & wellbeing objectives.</p> <p>Further analysis required on impact of closure against protected characteristics on customers and the wider community.</p>	P Finnie R Macaloney		Council Plan Supporting Stronger & Healthy Communities

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Sex	Female Male	<p>Mitigate against closure through delivery of a commercial performance improvement plan.</p> <p>Develop action plan to increase income generation, reduce costs to achieve net zero subsidy.</p> <p>Retaining the venue will provide the community with a positive destination to participate in health & fitness and deliver on the councils health & wellbeing objectives.</p> <p>Further analysis required on impact of closure against protected characteristics on customers and the wider community.</p>	P Finnie R Macaloney		Council Plan Supporting Stronger & Healthy Communities

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Poverty	Low income	<p>Mitigate against closure through delivery of a commercial performance improvement plan.</p> <p>Develop action plan to increase income generation, reduce costs to achieve net zero subsidy.</p> <p>Retaining the venue will provide the community with a positive destination to participate in health & fitness and deliver on the councils health & wellbeing objectives.</p> <p>Further analysis required on impact of closure against protected characteristics on customers and the wider community.</p>	P Finnie R Macaloney		Council Plan Supporting Stronger & Healthy Communities

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.

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	Yes	Mitigate closure by approving the venues being retained and identified as a commercial performance improvement venue within the SPR. The recommendation is to develop an agreed plan to increase income generation and reduce cost with the aim to achieve net zero subsidy.
Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups	No	
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:	16/01/2024
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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	The consultation shows that closure would have an impact on most of the protected characteristics	
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: The proposed mitigation against closure is to develop a commercial performance improvement plan. This plan should also continue to monitor and assess the impact of this on the community to ensure impact of this minimised
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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 / No	
LOW	Yes	A new business approach is being explored for this venue to make it financially viable. There is no further EPIA impact at this time.

SECTION ELEVEN: CHIEF OFFICER SIGN OFF

Director / Head of Service:		
Signature:	<i>Michael McGuinness</i>	Date: 25/01/2024