

Equality & Poverty Impact Assessment 00432 (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 Pavilions - Phase 3	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	No

Who does the Proposal affect?	Service Users	Members of the Public	Employees	Job Applicants
	Yes	Yes	Yes	No

Other, please specify:

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

23/02/2023	The aim is to engage with sports clubs and organisations as stated in stage 3 of SPR to enter into asset transfer agreements to operate pavilions with no financial risk or costs associated to the council.
24/02/2023	No information available on frequency and level of usage by clubs.
06/03/2023	Further consultation required with clubs to establish community asset transfers notes of interest.

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

11/12/2024	<p>The latest recommendations for Pavillions are noted below:</p> <ul style="list-style-type: none">Anderson Road - CATBottom Castle Park - CATGlenpark - CATStirling Road - CATRussell Park - To Close <p>Section 2 - Financial position updated Section 3a - List of Pavilions with no live or current expressions of interest. Added list of pavilions with live pitch permits. Section 3 - Best Judgement section - updated Section 4 - Engagement updated Section 5 & 6 - updated Section 7 - Lead Officers updated</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:	£112,880 net position (excluding central charges) £12,000	2022/23 projected year end position for all pavilions. SPR costs for Phase 3 pavilions only.
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):	31/03/2026	

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, age, sex

Performance data is not captured for usage of pavilions. Football and Rugby clubs apply annually for permits to access pitches across multiple locations for training and matches across the council area.

Pavilions identified for SPR Phase 3 Community Asset Transfer / closure with pitch permits issued for 24/25 season:

Anderson Park - Bonnybridge FC

Bottom Castle Park - Dunipace Juniors

Stirling Road - Camelon Juniors, Stein's Thistle

Glen Park - Westquarter AFC

Russell Park - Stenhousemuir FC

Pavilion with no live expressions of interest in Community Asset transfer:

Russel Park

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 proposals. Email correspondence was also accepted.

No emails received pertaining to these venues

13 survey responses received from user of the facilities (5), resident in the ward (2, on behalf of a community group / organisation (5), not answered (1).

9 respondents stated they would be disproportionately affected by the SPR for pavilions.

Gender of responses received - females 4, male 7, not answered 2.

The age profile of respondents;

25 - 44 years - 3 responses, 45 - 64 years - 7 responses, 65+ years - 1 responses, not answered - 2 responses.

The majority of respondents did not select a protected characteristic

Summary of responses stating protected characteristics;

AGE - 3 responses received, POVERTY - 2 responses, DISABILITY, SEX & ETHNICITY - 1 response

Negative impact on young people and their health and wellbeing, lack of changing facilities and affordability were the most common concerns raised were the pavilions to close with no alternative provision provided. Comments from football clubs that they are of the understanding that they will have sole access to the new pavilions needs to be explored further.

Best Judgement:

Has best judgement been used in place of data/research/evidence?	Yes
Who provided the best judgement and what was this based on?	Financial performance and viability of the venues.
What gaps in data / information were identified?	No information held by sports & leisure operations team on frequency and level of usage by clubs to measure against protected characteristics.
Is further research necessary?	No
If NO, please state why.	Direct communication to all user groups advising of SPR proposals to close pavilions, outlining opportunities for groups to take ownership of named pavilions.

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 complete an online survey. 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.
Display / Exhibitions	No	
User Panels	No	
Public Event	Yes	Council carried out a series of public consultation meetings across the council area enabling communities to provide feedback on SPR proposals.
Other: please specify	Direct communication to all user groups advising of SPR proposals to close pavilions, outlining opportunities for groups to take ownership of named pavilions.	
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?	No	

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>Negative impact on the community and their health & wellbeing.</p> <p>Further work required to understand the impact of pavilion closures.</p> <p>If clubs do not progress with Community Asset Transfer concerns there is no alternative changing and toilet facilities with pitch permits.</p> <p>Dec-24 Update: No impact for those Pavilions progressing with CAT. Impacts will be realised at Russell Park if a successful CAT expression of interest received by 31 March 2025.</p>
Disability			✓	<p>Negative impact the community and their health & wellbeing.</p> <p>Further work required to understand the impact of pavilion closures.</p> <p>If clubs do not progress with Community Asset Transfer concerns there is no alternative changing and toilet facilities with pitch permits.</p> <p>Dec-24 Update: No impact for those Pavilions progressing with CAT. Impacts will be realised at Russell Park if a successful CAT expression of interest received by 31 March 2025.</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:

				<p>Further work required to understand the impact of pavilion closures.</p> <p>If clubs do not progress with Community Asset Transfer concerns there is no alternative changing and toilet facilities with pitch permits.</p> <p>Dec-24 Update: No impact for those Pavilions progressing with CAT. Impacts will be realised at Russell Park if a successful CAT expression of interest received by 31 March 2025.</p>
Ethnicity	✓			No specific impacts have been identified.
Religion / Belief / non-Belief	✓			No specific impacts have been identified.
Sexual Orientation	✓			No specific impacts have been identified.
Transgender	✓			No specific impacts have been identified.
Pregnancy / Maternity	✓			No specific impacts have been identified.
Marriage / Civil Partnership	✓			No specific impacts have been identified.
Poverty			✓	<p>Negative impact on the community and their health & wellbeing.</p> <p>Age, sex and health inequalities are the key protected characteristics to be considered for this group.</p> <p>Further work required to understand the impact of pavilion closures.</p> <p>If clubs do not progress with Community Asset Transfer concerns there is no alternative changing and toilet facilities with pitch permits.</p> <p>Dec-24 Update: No impact for those Pavilions progressing with CAT. Impacts will be realised at Russell Park if a successful CAT expression of interest received by 31 March 2025.</p>
Care Experienced	✓			No specific impacts have been identified.
Other, health, community justice, carers etc.	✓			No specific impacts have been identified.

Risk (Identify other risks associated with this change)	<p>Reputational damage to the council on the impact of closing pavilions will have on its ability to deliver its physical and mental health & wellbeing agenda as stated in the council plan.</p> <p>Community Impact - If clubs do not progress with Community Asset Transfer teams may not meet terms and conditions of leagues to participate in league and cup competitions.</p> <p>Dec-24 Update: No impact for those Pavilions progressing with CAT. Impacts will be realised at Russell Park if a successful CAT expression of interest received by 31 March 2025.</p>
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	Evidence of Due Regard
Eliminate Unlawful Discrimination (harassment, victimisation and other prohibited conduct):	<p>The closure of these facilities will affect users and some negative impacts on specific protected characteristic groups have been identified, however there is little scope for mitigation.</p> <p>Dec-24 Update: No impact for those Pavilions progressing with CAT. Impacts will be realised at Russell Park if a successful CAT expression of interest received by 31 March 2025.</p>
Advance Equality of Opportunity:	<p>Community Asset Transfer as opposed to closure ensures the identified protected groups above still have access to facilities and continuity in their activities. Community engagement was undertaken to ensure the views of all interested parties were considered.</p>
Foster Good Relations (promoting understanding and reducing prejudice):	<p>If clubs do not progress with Community Asset Transfer the proposals do not create scope to foster good relations between different protected characteristics groups. There is some risk that the proposals may reduce the capacity to do so by removing assets used by communities.</p>

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 local economy
Councils	Yes	Impact on the council's ability to deliver its physical and mental health & wellbeing agenda as stated in the council plan.
Education Sector	No	
Fire	No	
NHS	Yes	Impact on the council's ability to deliver its physical and mental health & wellbeing agenda as stated in the council plan. Impact on NHS services. NHS representation at Sport & Leisure Board.
Integration Joint Board	Yes	Impact on the council's ability to deliver its physical and mental health & wellbeing agenda as stated in the council plan. Impact on IJB services.
Police	No	
Third Sector	Yes	Sports Clubs- Direct communication to all user groups advising of SPR proposals to close pavilions, outlining opportunities for groups to take ownership of named pavilions.
Other(s): please list and describe the nature of the relationship / impact.	Sportscotland & sports governing bodies - impact on participation in grass roots sports.	

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	Community	<p>Mitigate against closure through delivery of a community asset transfer to community groups.</p> <p>Explore notes of interests from community groups to take on ownership of pavilions.</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 against protected characteristics for customers, clubs and the wider community.</p> <p>Dec-24 Update: Continue to engage with clubs to bring forward a CAT expression of interest for those pavilions currently without.</p>	R Hammond 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 through delivery of a community asset transfer to community groups.</p> <p>Explore notes of interests from community groups to take on ownership of pavilions.</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 against protected characteristics for customers, clubs and the wider community.</p> <p>Dec-24 Update: Continue to engage with clubs to bring forward a CAT expression of interest for those pavilions currently without.</p>	<p>R Hammond</p> <p>R Macaloney</p>		Falkirk Plan

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Sex	Community	<p>Mitigate against closure through delivery of a community asset transfer to community groups.</p> <p>Explore notes of interests from community groups to take on ownership of pavilions.</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 against protected characteristics for customers, clubs and the wider community.</p> <p>Dec-24 Update: Continue to engage with clubs to bring forward a CAT expression of interest for those pavilions currently without.</p>	<p>R Hammond</p> <p>R Macaloney</p>		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	<p>Mitigate against closure through delivery of a community asset transfer to community groups.</p> <p>Explore notes of interests from community groups to take on ownership of pavilions.</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 against protected characteristics for customers, clubs and the wider community.</p> <p>Dec-24 Update: Continue to engage with clubs to bring forward a CAT expression of interest for those pavilions currently without.</p>	<p>R Hammond</p> <p>R Macaloney</p>		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 report to elected members. Council meeting 30th January 2025 SPR update report 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	No	
Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups	Yes	SPR proposal is for community asset transfer of pavilions to sports clubs with no financial risk or costs associated to the council. Progress discussions with sport clubs to operate pavilions, Deadline for expressions of interest from community groups remains open until 31/03/25. As stated in SPR report, if no expressions of interest are received by the deadline the named pavilions will move to closure and surplus property procedures.
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:	12/12/2024
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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 limited data but it shows an impact on sex, disability and people on low incomes, Views have been expressed that in particular highlight the need for buildings to help improve help and well-being	
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: Community Asset transfer (CAT) is proposed to mitigate the impact of closure for these buildings. As the CAT is developed the impact on communities should continue to be assessed and monitored
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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	Dec-24 Update: No impact for those Pavilions progressing with CAT. Impacts will be realised at Russell Park if a successful CAT expression of interest received by 31 March 2025. Continue to engage with clubs to bring forward a CAT expression of interest for those pavilions currently without.
LOW	Yes / No	

SECTION ELEVEN: CHIEF OFFICER SIGN OFF

Director / Head of Service:			
Signature:	<i>Michael McGuinness</i>	Date:	09/01/2025