

# Equality & Poverty Impact Assessment 00425 (Version 1)

## SECTION ONE: ESSENTIAL INFORMATION

<b>Service &amp; Division:</b>	Place Services Growth, Planning & Climate	<b>Lead Officer Name:</b>	Carol Whyte
		<b>Team:</b>	Sport & Leisure
		<b>Tel:</b>	07872828983
		<b>Email:</b>	carol.whyte@falkirk.gov.uk
<b>Proposal:</b>	SPR - Polmonthill Snow Sports Centre proposed closure	<b>Reference No:</b>	

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

<b>Other, please specify:</b>	Separate EPIA required for employees effected by the proposed closure. 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.
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### Identify the main aims and projected outcome of this proposal (please add date of each update):

16/02/2023	Review operating model of Polmont Snow Sports Centre to determine the position for the council going forward. The aim is to close the venue, adopt a different operating model or community asset transfer to the clubs with no financial risk or costs associated to the council.
20/02/2023	Gap in information on Snow Sports Centre users to measure against protected characteristics.
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 community asset transfer as the appropriate course of action for Polmonthill Snow Sports Centre.
06/03/2023	Further engagement with Snow Sports Clubs, Snow Sports Scotland, Sportscotland to establish the viability of progressing asset transfer of the venue,
16/01/2024	Ski Club registered interest in CAT.



## SECTION TWO: FINANCIAL INFORMATION

For budget changes ONLY please include information below:			Benchmark, e.g. Scottish Average
Current spend on this service (£'0000s)	Total:	£116,060 net position (excluding central charges)	2022/23 year end projection
		£175,836	2022/23 Year end expenditure
		£82,822	2022/23 Year end net position
		£259,590	2023/24 Budgeted expenditure
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 - poverty, age

2021 /22 total admissions = 8,775

2022/23 projected year end admissions = 10,002

% split across the following categories: adult 3,294 (39%), Junior 5,172 (61%). Gender, age and postcode are not captured for general admissions.

2022/23 Sports Development Classes to end Q3 = 2,162 admissions

Gender split - 32% female, 38% male, 30% not specified.

79% of participants in the sports development programme are aged under 12 years. 19% are aged under 16 years and 2% adults.

#### Jan 2024 Update

2022/23 total admissions = 11,280

2023/24 projected year end admissions = 16,120

2023/24 Sports Development Classes to end Q3 = 2,373 admissions

Gender split - 42% female, 58% male,

80% of participants in the sports development programme are aged under 12 years. 14% are aged under 16 years and 6% adults.

#### **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 the SPR proposals. Email correspondence was also accepted.

2 emails received.

Poverty - Concern over low income families ability to continue snow sports activities should the venue close.

AGE - Closure of the venue would discriminate against children and young adults

### **Snow Sports Scotland (SSS)**

The venue is at the heart of SSS 2026 Strategic plan to get people more active. The strategy is key to supporting underrepresented groups, equality, diversity and achieving inclusion targets

POVERTY: closure of a purpose built venue, affordability and ability to travel to alternative location were the venue to close the most common concerns raised. Concerns over viability of an asset transfer to clubs and the councils decision making process were also noted.

70 survey responses received from users of the facility (60), on behalf of a community group / organisation (3), residents of the ward (7),

Gender of responses received - female 41, male 25, not answered 3. other 1.

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

The age profile of respondents

Under 16 years - 2 responses, 16 - 24 years - 1 responses, 25 - 44 years - 38 responses, 45 - 64 years - 25 responses, 65+ years - 1 responses, not answered - 3 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 community with the loss of snow sports venue, age discrimination against young people, ability to travel to an alternative venue, viability of an asset transfer to clubs and the councils decision were the most common concerns raised.

Summary of responses stating protected characteristics:

**AGE** - 7 responses, Of the 7 responses, 4 are female, 3 male. 25 - 44 years received the most responses with 4, closely followed by 45 - 64 years with 3 responses.

**DISABILITY:** 3 responses, 1 states they have a physical or mental health condition expected to last longer than 12 months. All 3 responses were from females in the 25 - 44 years age category.

**SEX:** - 3 responses, Of the 3 responses 2 are female, 1 male. All 3 responses are from the 25 - 44 years age category.

The remaining protected characteristics received 1 or no response. Negative impact on the loss of sport specific venue, age discrimination against young people, ability to travel to an alternative venue, and viability of an asset transfer to clubs were the most common concerns raised.

<b>Best Judgement:</b>	
<b>Has best judgement been used in place of data/research/evidence?</b>	No
<b>Who provided the best judgement and what was this based on?</b>	
<b>What gaps in data / information were identified?</b>	Admissions data does not identify the number of unique users or record protected characteristics.
<b>Is further research necessary?</b>	Yes
<b>If NO, please state why.</b>	

**SECTION FOUR: ENGAGEMENT**

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

<b>Has the proposal / policy / project been subject to engagement or consultation with service users taking into account their protected characteristics and socio-economic status?</b>	Yes	
<b>If YES, please state who was engagement with.</b>	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.	
<b>If NO engagement has been conducted, please state why.</b>		
<b>How was the engagement carried out?</b>	<b>What were the results from the engagement? Please list...</b>	
<b>Focus Group</b>	No	
<b>Survey</b>	Yes	Council online survey for interested parties to provide feedback on SPR proposals.  70 survey responses received from users of the facility (60), on behalf of a community group / organisation (3), residents of the ward (7),  5 respondents stated they would be disproportionately affected by the SPR proposal for this venue.
<b>Display / Exhibitions</b>	No	
<b>User Panels</b>	No	
<b>Public Event</b>	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.
<b>Other: please specify</b>	Two comments received to the SPR email, Poverty - 1,Equalities - 1	
<b>Has the proposal / policy/ project been reviewed / changed as a result of the engagement?</b>	No	



<b>Have the results of the engagement been fed back to the consultees?</b>	No
<b>Is further engagement recommended?</b>	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 loss of sport specific venue were the most common concerns raised. Concerns over age discrimination against young people, affordability, viability of an asset transfer to clubs were also noted.
Disability				Negative impact on the loss of sport specific venue, age discrimination against young people, ability to travel to an alternative venue, and viability of an asset transfer to clubs were the most common concerns raised.
Sex			✓	Negative impact on the loss of sport specific venue, age discrimination against young people, ability to travel to an alternative venue, and viability of an asset transfer to clubs were the most common concerns raised.
Ethnicity				
Religion / Belief / non-Belief				
Sexual Orientation				
Transgender				
Pregnancy / Maternity				
Marriage / Civil Partnership				
Poverty			✓	See evidence in section 3 on Poverty .
Care Experienced				
Other, health, community justice, carers etc.				

**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:**

	<b>Evidence of Due Regard</b>
<b>Eliminate Unlawful Discrimination (harassment, victimisation and other prohibited conduct):</b>	
<b>Advance Equality of Opportunity:</b>	Community engagement was undertaken to ensure the views of all interested parties were considered.
<b>Foster Good Relations (promoting understanding and reducing prejudice):</b>	

**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.
<b>Business</b>	Yes	Potential impact to the local economy. Attracting visitors from out with the council area to use facilities.
<b>Councils</b>	No	
<b>Education Sector</b>	No	
<b>Fire</b>	No	
<b>NHS</b>	No	
<b>Integration Joint Board</b>	No	
<b>Police</b>	No	
<b>Third Sector</b>	No	
<b>Other(s): please list and describe the nature of the relationship / impact.</b>	Snow Sports Scotland – Would lose an important asset within their sporting network.	

## 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.</p> <p>Develop action plan to deliver asset transfer. Further discussion required with ski clubs and Snow Sports Scotland to establish interest and viability.</p> <p>Ski Club registered interest in CAT.</p>	<p>P Finnie</p> <p>R Macaloney</p>		<p>Council Plan</p> <p>Supporting stronger &amp; healthier communities.</p>
Sex	Community	<p>Mitigate against closure through delivery of a community asset transfer.</p> <p>Develop action plan to deliver asset transfer. Further discussion required with ski clubs and Snow Sports Scotland to establish interest and viability.</p> <p>Ski Club registered interest in CAT.</p>	<p>P Finnie</p> <p>R Macaloney</p>		<p>Council Plan</p> <p>Supporting stronger &amp; healthier communities.</p>

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Poverty	Community SIMD	Mitigate against closure through delivery of a community asset transfer.  Develop action plan to deliver asset transfer. Further discussion required with ski clubs and Snow Sports Scotland to establish interest and viability.  Ski Club registered interest in CAT.	P Finnie  R Macaloney		Council Plan  Supporting stronger & healthier 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.

Council meeting 31st January 2024 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	No	
Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups	Yes	SPR proposal is to close the venue, the mitigation to avoid closure is to approve community asset transfer to the snow sports clubs with no financial risk or costs associated to the council.  Ski Club registered interest in CAT.
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**

<b>OVERALL ASSESSMENT OF EPIA:</b>	<b>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?</b>	Yes
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<b>ASSESSMENT FINDINGS</b>	Evidence shows that this will have a negative impact on age, sex and disability . It also shows that snow sports scotland consider this venue vital to increase diversity in snow sports participation nationally	
<b>If YES, use this box to highlight evidence in support of the assessment of the EPIA</b>		
<b>If NO, use this box to highlight actions needed to improve the EPIA</b>		

<b>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>?</b>	Yes / No	If YES, please describe: the mitigation to closure is to develop an alternate operating model in partnership with Snow Sports Scotland . As this model is developed it is important to continue to monitor and assess impact of this on community
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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	SPR proposal is to close the venue which will have impact on some groups defined within the assessment. However, the mitigation to avoid closure is to approve community asset transfer to the snow sports clubs with no financial risk or costs associated to the council. The Ski Club have registered interest in CAT and this will be progressed with a view to avoiding full closure.

**SECTION ELEVEN: CHIEF OFFICER SIGN OFF**

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