

FULL EQUALITY IMPACT ASSESSMENT

Name of Policy, Decision, Strategy, Service or Function, Other: (please indicate)	Haslingden Pool Option 4: To close the pool and consider site disposal options	
Lead Officer Name(s):	Helen Lockwood and Martin Kay	
Job Title & Location:	Chief Executive of the Council and General Manager of Rossendale Leisure Trust	
Department/Service Area:	-	
Telephone & E-mail Contact:	01706 252428 helenlockwood@rossendalebc.gov.uk	
Date Assessment:	Commenced: May 2012	Completed: As at 15.11.12

We carry out Equality Impact Assessments to analyse the effects of our decisions, policies or practices. The EIA should be undertaken/started at the beginning of the policy development process – before any decisions are made.

1. OVERVIEW

The main aims/objectives of this policy¹ are:
There are a number of options being considered but the Council and Rossendale Leisure Trust to reduce the costs of leisure provision in the valley.
This impact assessment considers the impact on protected equality groups should the option to close the pool and consider site disposal options be pursued.
This EIA has been carried out in accordance with the evidence available at this current time and will be reassessed as appropriate throughout the consultation process to inform final decision making.

Is the policy or decision under review (please tick)

New/proposed

Modified/adapted

Existing

The main intended people or groups that will be most affected by this policy are:
Current users of the Haslingden Pool facility (including the health suite), this includes local residents, schools, and specific swim session groups. Specifically the organised user groups for specific swim sessions. Details are set out in Appendix 2 and 3 of the evidence Appendices.
GP referrals using Haslingden Pool may also be affected as they may have travel issues in relation to accessing the nearest alternative.

¹ Policy refers to any policy, strategy, project, procedure, function, decision or delivery of service.

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2. FINDINGS / EVIDENCE

FINDINGS/EVIDENCE: The following information/data has been considered in developing this policy/decision (including any consultation or engagement):	
Information/data obtained and/or Consultation/engagement carried out (please state who with)	What does this tell us? / What does it say?
Please note that the full details of the evidence used is set out in the Evidence Appendices – summary points of which had been highlighted here as follows:	
Appendix 1 Haslingden Swimming Pool background information	<p>A 25 by 8 yard 4 lane swimming pool built in 1936.</p> <p>Currently used by disabled users, however there are restrictions; specifically there is no accessible toilet or changing facilities nor adequate access to the spectator area. Any further accessibility works is not currently economically viable.</p> <p>There is assigned disabled parking.</p>
Appendix 2 Facility usage data (provided by Rossendale Leisure Trust (RLT)) <ul style="list-style-type: none"> - Overall usage - Usage comparison across RLT facilities - Break down of user groups 	<p>Tables 1&2 show a steady decline in usage figures year on year since 2007/08 for Haslingden Swimming Pool.</p> <p>Table 3 shows that general swimming aside, the top 3 highest head count on a weekly basis is: Children's Lessons – 416 PW Primary Schools – 300 PW Swimming Club – 220 PW</p>
Appendix 3 user groups potentially affected and mitigating actions considered / alternatives considered	<p>It is likely that the majority of the current user groups for specific swim sessions could be accommodated at other facilities/locations.</p> <p>In particular there are 4 disabled users week who currently access one to one swimming sessions as HSP for whom would be impacted, but consultation to accommodate these users is currently is being explored.</p> <p>There are two special needs schools on a weekly from outside of the Borough would also use the pool on a weekly basis and two special needs schools within the borough that use the pool on an had hoc basis. Alternatives will be explored during consultation.</p> <p>Where other protected equality groups identified as a possible impact appropriate mitigating actions are being considered to accommodate them at alternative locations to reduce the impact. Full details of other affected groups and mitigating actions considered are explored in Appendix 3 of the Appendices.</p> <p>Further action and discussion would be needed to fully explore</p>

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	<p>how best groups can best be accommodated in order to reduce the impact as far as is reasonably possible. This would take place during the consultation stage.</p> <p>General cross cutting factors to take into account are:</p> <ul style="list-style-type: none"> - Transport/travel issues to alternative locations might also be a consideration. - Possible affect on how busy other facilities would become and customer satisfaction.
Appendix 4 details of Schools using Haslingden Pool (Provided by RLT)	<p>12 primary schools use HSP for weekly school swimming sessions, for which 13 separate swim sessions are run weekly. 2 of these schools are Rossendale Special Needs schools and 2 of the schools are Special Needs schools from outside of the Borough. In addition, 6 secondary schools use the pool on an ad hoc basis (2 of which are special needs schools within the borough).</p> <p>If a decision was made to close HSP, the Council and RLT would work with the schools affected to identify alternative arrangements as far is as reasonably possible to accommodate them at alternative locations.</p>
Appendix 5 comparison of services available at each swimming pool facility within Rossendale (Provided by RLT)	<p>If a decision was taken to close Haslingden Swimming Pool, this information would be utilised to raise awareness and signpost customers to services at alternative facilities/services within Rossendale. In addition, actions to support the current user groups to be accommodated at alternative venues or find alternative sessions would be undertaken.</p>
Appendix 6 Alternative pool facilities within Rossendale and neighbouring areas (Provided by RLT)	<p>There are a number of swimming pools serving the community, both within Rossendale and the neighbouring areas:</p> <p>Marl Pits, Rawtenstall - 2.7 miles Ramsbottom – 4.2 miles Hyndburn Leisure Centre, Hyndburn – 5.7 miles Shadsworth Leisure Centre, Blackburn – 7 miles Mercer Hall Leisure Centre, Hyndburn - 7.8 miles Padiham Leisure Centre, Burnley – 8.3 miles Castle Leisure Centre Bury - 8.8 miles Whitworth Leisure Centre (CLAW), Whitworth – 9.3 miles St Peters Leisure Centre, Burnley - 9.3 miles</p>
Appendix 7 bus routes information to local facilities and location of swimming pool users – 2006 survey by PM consulting.	<p><u>Bus route data:-</u></p> <p>Data is not available to determine what proportion of current HSP users use public transport in order to determine a specific impact. However it is recognised that any decision to close HSP might impact on public transport users.</p> <p>Initial bus route data indicates that additional bus journeys might be required should the option to either build an alternative pool or to close Haslingden Swimming Pool is pursued.</p>

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	<p>Specific bus route journey details will be completed and made available as the consultation continues.</p> <p><u>The survey on location of pool users:-</u> While the majority of Haslingden pool users live in Haslingden, data usage suggests that there is some cross over between Marl Pits and Haslingden Pool sites i.e. customers for who Haslingden is most local, may use Marl Pits and vice versa. Based on this information, should Haslingden pool close it is likely that some customers may start to use Marl Pits.</p> <p>This suggests that Marl Pits is a viable alternative for some users to be relocated / accommodated at, as some people already use both facilities or live in Haslingden but use Marl Pits.</p>
Appendix 9 Local ethnicity data	<p>This data show that:</p> <ul style="list-style-type: none"> • The majority of the population across Rossendale and more locally within the Haslingden area is white British. • Haslingden has one of the highest BME populations within the Borough. <p>HSP do not offer BME specific sessions therefore with the information available at this time no impact can be identified for this protected equality group.</p>

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3. EQUALITY IMPACT

Using the table below please indicate whether the policy/strategy/decision has a positive, negative or no impact from an Equalities perspective on any of the protected equality groups listed below. **Please also give consideration to wider equality of opportunity and community cohesion impacts within and between the groups identified.** See EIA Guidance

Equality		Positive Impact (It could benefit)	Negative Impact (It could disadvantage)	Reason and any mitigating actions already in place (to reduce any adverse /negative impacts or reasons why it will be of positive benefit or contribution)	No Impact
Age	Older people	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Potential negative impact on this group has been identified however the over 50s swim sessions could be accommodated at Marl Pits. There are other Health Suites outside of RLT facilities.</p> <p>Impact would have to be determined and explored in further detail as part of the consultation if this is pursued as a viable option.</p> <p>Also possible travel issues in relation to the nearest alternative.</p> <p>Appendix 3 sets out possible mitigating actions.</p>	<input type="checkbox"/>
	Younger people and children	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Potential negative impact on this group has been identified - parent and toddlers / children's swim sessions and school swim sessions, some could be accommodated at Marl Pits. Impact would have to be determined and explored in further detail as part of the consultation if this is pursued as a viable option.</p> <p>Also possible travel issues in relation to the nearest alternative.</p> <p>Appendix 3 sets out possible mitigating</p>	<input type="checkbox"/>

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Equality		Positive Impact (It could benefit)	Negative Impact (It could disadvantage)	Reason and any mitigating actions already in place (to reduce any adverse /negative impacts or reasons why it will be of positive benefit or contribution)	No Impact
				actions.	
Disability	Physical/learning/mental health	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Potential negative impact on this group has been identified – disabled one to one user sessions and specific special school swim sessions, which we are currently exploring how and where these users could be accommodated. Impact would have to be determined and explored in further detail as part of the consultation if this is pursued as a viable option.</p> <p>Also possible travel issues in relation to the nearest alternative.</p> <p>Appendix 3 sets out possible mitigating actions.</p>	<input type="checkbox"/>
Gender Reassignment	Transsexual people	<input type="checkbox"/>	<input type="checkbox"/>	Based on information available at this time, no impact has been identified for this group.	<input checked="" type="checkbox"/>
Pregnancy and Maternity		<input type="checkbox"/>	<input type="checkbox"/>	Currently no aqua natal sessions offered at Haslingden Pool, therefore there has been no impact identified for this group.	<input checked="" type="checkbox"/>
Race (Ethnicity or Nationality)	Asian or Asian British people	<input type="checkbox"/>	<input type="checkbox"/>	Based on information available at this time no impact has been identified for this group. Assumes no significant BME user profile. Ethnicity data of customers is not collected.	<input checked="" type="checkbox"/>
	Black or black British people	<input type="checkbox"/>	<input type="checkbox"/>	As above	<input checked="" type="checkbox"/>
	Irish people	<input type="checkbox"/>	<input type="checkbox"/>	As above	<input checked="" type="checkbox"/>
	White British	<input type="checkbox"/>	<input type="checkbox"/>	As above	<input checked="" type="checkbox"/>
	Chinese people	<input type="checkbox"/>	<input type="checkbox"/>	As above	<input checked="" type="checkbox"/>
	Gypsies & Travellers	<input type="checkbox"/>	<input type="checkbox"/>	As above	<input checked="" type="checkbox"/>
	Other minority communities not listed	<input type="checkbox"/>	<input type="checkbox"/>	As above	<input checked="" type="checkbox"/>

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Equality		Positive Impact (It could benefit)	Negative Impact (It could disadvantage)	Reason and any mitigating actions already in place (to reduce any adverse /negative impacts or reasons why it will be of positive benefit or contribution)	No Impact
	above (please state)				
Belief or Religion		<input type="checkbox"/>	<input type="checkbox"/>	Based on information available at this time, no impact has been identified for this group.	<input checked="" type="checkbox"/>
Gender	Women	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Potential negative impact on this group has been identified for the ladies only swim sessions, but could be accommodated at Marl Pits. Impact would have to be determined and explored in further detail as part of the consultation if this is pursued as a viable option. Also possible travel issues in relation to the nearest alternative. Appendix 3 set out possible mitigating actions.	<input type="checkbox"/>
	Men	<input type="checkbox"/>	<input type="checkbox"/>	Based on information available at this time, no impact has been identified for this group.	<input checked="" type="checkbox"/>
Sexual Orientation	Lesbian women , gay men and bisexual people	<input type="checkbox"/>	<input type="checkbox"/>	Based on information available no impact has been identified for this group.	<input checked="" type="checkbox"/>
Marriage and Civil Partnership (employment only)		<input type="checkbox"/>	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Contribution to equality of opportunity		<input type="checkbox"/>	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Contribution to fostering good relations between different groups (people getting on well together – valuing one another, respect and understanding)		<input type="checkbox"/>	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Human Rights http://intranet/site/scripts/documents_info.php?categoryID=86&documentID=251		<input type="checkbox"/>	<input type="checkbox"/>	Any Council decisions will be undertaken in line with the Human Right Act 1998.	<input checked="" type="checkbox"/>

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What course of action does this EIA suggest you take? More than one of the following may apply	Please indicate
<p>Outcome 1: No major change required. The EIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken.</p>	<input type="checkbox"/>
<p>Outcome 2: Adjust the policy to remove barriers identified by the EIA or better promote equality. Are you satisfied that the proposed adjustments will remove the barriers identified? If there is a negative impact identified, you must consider (and evidence/record) what mitigating actions you have or will put in place to reduce the negative impact where/if possible, and to enhance the positive impact. This might include any partnership discussions/working that needs to be undertaken. Complete EIA Action Plan as appropriate.</p>	<input checked="" type="checkbox"/> At this current stage of the development process, with the information available, potential impacts will be explored for further mitigating actions to reduce the impact throughout the consultation process and impact will be reassessed if this is pursued as a viable option.
<p>Outcome 3: Continue the policy despite potential for negative impact or missed opportunities to promote equality identified. You will need to ensure that the EIA clearly sets out the justifications for continuing with it. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact. This might include any partnership discussions/working that needs to be undertaken. Complete EIA Action Plan as appropriate.</p>	<input type="checkbox"/>
<p>Outcome 4: Stop and rethink the policy when the EIA shows actual or potential unlawful discrimination or significant negative impact that can not be justified or mitigated against. <u>You must speak to Liz Sandiford (2452) or Emma Hussain (2451) immediately.</u></p>	<input type="checkbox"/>

4. OUTCOME OF EIA – COURSE OF ACTION TO BE TAKEN

If a negative impact as been identified and there are no sufficient mitigating actions in place or planned. Please see the guidance and you must speak to/ see advice from your Head of Service or Head of People and Policy.

5. EIA ACTION PLAN & REVIEW

Based on the impact assessment, findings/evidence and outcomes identified above, please complete the Action Plan below – these should be actions arising as a result of undertaking the EIA.

The Action Plan should address (not exhaustively):-

- Any gaps in findings/evidence research including any consultation or engagement regarding the policy and its actual/potential affects.
- How you will address any gaps.
- What practical changes/action will help reduce any negative impacts that you have identified.
- What practical changes/action will help enhance any positive contributions to equality?

Further Actions Required: Yes No

EIA Action Plan

Issue	Action required	Lead officer	Timescale
Further consultation	Consultation to be undertaken via: 1. Pool Panel 2. Affected user groups and protected equality groups 3. Wider public consultation		
Impact of closure on current users	Consideration of alternative facility locations for current users potentially affected; identify current users who require support identifying alternative facilities.		
Impact on immediate community if closure pursued	Ensuring that the building is safe and secure. Communication about this with the local community is vital. Consideration of disposal options would need to be taken into account and possibly a further impact assessment undertaken.		

Please add more rows if required.

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Actions arising from the Impact assessment should form part of the business planning process for service areas.

Monitoring & Reviewing the Effect of the Policy

Please state how you will monitor the impact and effect of this policy and where this will be reported:

The impact assessment will be updated as new information is made available and/or issues are raised by Elected Members, facility users, partners and members of the public during the consultation process.

Date of Review²: Ongoing while options are being consulted on to inform a final decision.

² This date will be set on an annual basis as default for review unless otherwise specified by you.

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