

FULL EQUALITY IMPACT ASSESSMENT

Name of Policy, Decision, Strategy, Service or Function, Other: (please indicate)	Haslingden Pool Options: 1. Transfer responsibility for the pool to another organisation 2. To close the pool and consider site disposal options	
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Date Assessment:	Commenced: May 2012	Completed: Ongoing

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:
A number of options have been considered by 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 either of the following options be pursued: Option 1: Transfer responsibility for the pool to another organisation. Option 2: To close the pool and consider site disposal options.
This EIA has been carried out in accordance with the evidence available at this current time and has been informed by the outcome of 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. Details are set out in the EIA Evidence Appendices.

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

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Current users of Marl Pits might also be affected as a result of possible reprogramming of water time as a consequence of either option.

GP referrals currently using Haslingden Pool may also be affected as they may have travel issues in relation to accessing the nearest alternative.

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:	
<p>Haslingden Swimming Pool Options Consultation. The consultation ran from January to end of March 2013.</p> <p>Respondents can be identified into three types:</p> <ul style="list-style-type: none"> - General HSP user / other interested parties (635) - HSP swim session users (114) - Schools (15) <p>784 consultation questionnaire responses received, including 18 comments received from Marl Pits users via the specific comments form at this facility.</p> <p>In addition, 5 individual responses have been submitted to the council outside of the consultation questionnaire. These have been noted and responded to where appropriate/required.</p> <p>Sent to: [see consultation plan via the Council's website] 769 Citizen's Panel members Neighbourhood Forums Key partners / stakeholders 34 schools Awareness raising generally throughout RBC/RLT websites</p>	<p>Key messages / headline points – overview of all respondents:</p> <p>General HSP swim users / other interested parties (635 - 83.1%) Of the general users who responded:</p> <ul style="list-style-type: none"> • The majority use only HSP to swim • 72% use it at least weekly • 66% travel to the pool by car • 39% also use other leisure facilities in the borough to swim • 80% of users or over support Option 1 (transfer) • 52% of users believe that Option 1 would have a direct impact on them, positive and negative <ul style="list-style-type: none"> - Mainly that the pool will stay open but that prices may increase • There is a willingness to accept small changes to prices, water time allocation and opening times • 72% of respondents felt that they would be affected by Option 2 closing the pool (9% for non users) • 36% would be able to use another pool nearby <ul style="list-style-type: none"> - 46% would not <p><u>Feedback from general user/interest parties also identified the following:</u></p> <ul style="list-style-type: none"> - Ensure the new owners have a clause to state the hours of opening and the costs cannot go over a certain % within a set length of time. - Impact on current concession passes for uses? What provision has been / will be put in place as part of the transfer agreement. - Consider a community project for running the pool. - Give some financial help to any new owners - Have conditions in relation to prices and opening hours - Any transfer should include a 'none worsening' clause in the contract. <p>Swim session group users (114 - 14.9%) Of the swim session users who responded:</p> <ul style="list-style-type: none"> • 80% use the pool only (19% use the pool and health suite) • 98% use the pool at least weekly • 62% travel to the pool by car

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and posters in the borough in key community facilities.

- 20% also use other leisure facilities in the borough to swim
- 84% agree with Option 1 (transferring ownership)
- 55% believe Option 1 would have a direct impact on them, positive and negatives are identified
 - Mainly that it would ensure that they could continue swimming but that costs may increase
- There is a willingness to accept changes to opening times and water time allocation, but lower willingness to accept price increases
- 89% would be highly affected by closing the pool
- 21% would be able to use another pool nearby
 - 58% would not
- 41% would/could not attend any alternative swim time arranged for them at Marl Pits

Schools (15 - 2%)

Of the Schools who responded:

- 82% travel to the pool by bus
- 33% use other Leisure Trust facilities in the borough to swim
- 80% support Option 1 (transfer of ownership)
- 53% believe that Option 1 would have a direct impact on their school
 - Mainly due to increased costs and reduced availability of time slots
- There is a willingness to accept changes to opening times but a lower willingness to accept changes to prices and water time allocation
- 80% of schools would be affected by closing the pool
- 40% would be able to use another facility nearby
 - 33% felt they would not
- The majority (11 schools) would like the council to re-arrange their swim sessions if the pool was to close. Only 3 schools did not want to be considered in re-programming of water time. One school did not answer.

Marl Pits users (18 comments forms responses received)

- Strong preference to keep Haslingden pool open to avoid over-crowding at Marl Pits.
- Concerns about impacts of existing Marl Pits' school and children's lessons
- Bring sauna and steam room facilities to Marl Pits
- Sell the pool to a developer and build a new pool in Haslingden with the money raised.

General consultation findings (784 total number of respondents)

- Fairly even split of male/female respondents
- Largely the age range of respondents was similar to the borough actual, except for the under 30s for whom we had a lower response rate.
- The percentage of disabled respondents was proportionate with the profile of the borough. 18% identified as disabled.
- The majority of respondents were White British. BME respondents only accounted for 2%. This is below the percentage of the boroughs BME population.
- The majority of respondents (38%) were in full time work, followed by 29% being retired. Only 2% were unemployed and 3% identified as a carer or unable to work.

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- The majority travel to HSP by car, with schools travelling by bus. However between 18-30% across all three respondent types walk to the facility.
- The majority do not use any other facilities.
- The majority across the board agreed with Option 1 (transfer). Although about half did say that this option would have an impact on them, the impacts identified were both positive and negative.
- The majority said that they would support possible small changes opening times, price and water time allocation for Option 1. Although schools were generally less inclined to support price changes.
- A high percentage of the general public and swim session users said that Option 2(closure) would have a 'high' impact on them. But only 47% of schools said it would have a 'high' impact on them. 7% of school said it would impact on the 'not at all'.
- In relation to Option 2 (closure) a third of schools said they would not be able to use another facility but 40% said they would. Over half of swim session users said that they would not be able to use another facility nearby, but a fifth said yes, they could. For general users, just under half said that they could not use another facility nearby, although just over a third said yes, they could use another facility.
- The geographical location / spread of general public respondents identified 1%, were from outside of the borough. The majority of general public respondents were from Helmsore, Greenfield and Longholme.
- Of all respondents, over half said they did not use HSP to swim. Of those that did use HSP, 80% use it for the pool only, 19% for the pool and health suite and only 2% for the health suite.
- 18% of swim session users said that helping to find them alternative water time would 'not at all' reduce the impact on them.
- 48% of current users would still use other alternative facilities if they could be accommodated.
- 41% of swim session users would not attend any identified swim time as an alternative facility if option had to be pursued. This is higher for women aged 50-59 and users without a disability.
- 58% of swim session users said that they would not be able to use another facility nearby if Option 2 had to be pursued; this is higher for users with a disability. However, when asked whether trying to re-accommodate users at alternative facilities would reduce the impact on them, over half of swim session users said yes. This is higher for men aged under 30 and for users with a disability.

Key findings from equality groups

It should be noted that some data when broken down by equality group are small numbers, with common impact themes which include travel, additional costs and the suitability / capacity of Marl Pits to accommodate those impacted on at HSP.

BME (9): Despite efforts to engage the Asian community, and in particular Asian women by attending local groups, the response rate was very small, therefore the statistical validity of the findings need to be considered in light of small number of responses.

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Of those BME residents that did respond, the majority were male .The majority of BME users access the pool by car. Half of BME respondents said they also use other RLT facilities too. A third of BME respondents said they would be able to use another facility nearby to swim, the same proportion said that they would not and did not know if they could use another facility. This suggests there is a need for further awareness raising/ signposting support with this group should Option 2 have to be pursued. Consultation also identified the need to ensure the needs of Asian women were taken into account when considering re-programming and/or transfer of ownership.

Women (424): Half of women respondents said they used HSP once a week with 28% using it most days. The majority (68%) access HSP by car and 29% walk, 3% use the bus. 66% of women users said they only use HSP, while a third of women said that they did use other facilities to swim too. 81% of women said that it would impact on them 'a lot' if HSP was to close. Just over half said they would not be able to use another pool facility, but 29% said that they could use another facility. 17% felt that they did not know if they would be able to use another facility. This suggests there is a need for further awareness raising/ signposting support with this group should Option 2 have to be pursued. Over half of women said that it would help reduce the impact 'a lot or 'a little' if the Council / Trust tried to help find an alternative pool facility / water time. 24% of women felt that this would not reduce the impact at all. Half of women respondents said they still would not go to alternative sessions if we could look to re-provide, but 48% said they would.

Disability* (128): There is a fairly even split of male/female disabled respondents. 50% of disabled respondents use HSP once a week and 29% said they use the pool most days. The majority (46%) of disabled users access HSP by car. Just under a third walk and a fifth by bus. The majority of disabled respondents (77%) only use HSP, just over a fifth do use other facilities. 85% of disabled users said that closure of the pool would impact on them 'a lot'. While over half of disabled respondents said that they would not be able to use another facility, about a fifth said they would be able to use another facility, and another fifth said they didn't know. This suggests there is a need for further awareness raising/ signposting support should Option 2 have to be pursued. Over half of disabled users said that help from Council/Trust to try to find alternative facilities/ water time would reduce the impact on them 'a lot'. The majority of disabled respondents said they would attend alternative sessions elsewhere if we could look to re-provide, however 37% said they would not. Feedback from special needs schools identified that 'any changes should be kept to a minimum and that swimming time should be made available in the week time as it is part of the children's education'.

*NB: it should be noted that this accounts for respondents who identified themselves as disabled within the equality monitoring section of the consultation questionnaire.

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GP referrals: RLT are not able to provide details in relation the number of users at HSP from GP referrals. Therefore with the information available it is not possible to identify the level of potential impact option 1 or 2 might have on this group. However, it is recognised that there may be a cross cutting impact in relation to travel and cost impacts on this group.

Schools (Children & Young People): Of the 34 schools directly contacted during the consultation, only 15 formal responses to the consultation questionnaire were received (two did not provide the school name). One fifth of schools who did respond, said they currently walk to HSP. A third said that they also use other RLT facilities already. Where schools identified concerns with Option 1 and 2, the main reasons where due to concerns about increased costs, staffing changes, reduced availability of time slots and increased time out of school travelling to an alternative.

27% of schools still didn't feel they knew what the impact would be on them if HSP had to close. While nearly half the schools that responded felt they would be impact 'a lot' if HSP had to close, a third said while they would be affected by the closure, they would be able to find a way of using an alternative facility. Further, despite a third also saying they felt that they could/would not be able to access another pool nearby, the majority (11 of the 14) of schools that responded confirmed that they would like to be considered in the re-programming review. Work with RLT and schools is on-going to determine actual school demand for swimming in the year ahead to complete re-programming. Awaiting confirmation from schools.

Feedback from schools and parents was to 'keep costs the same; provide free transport; set up 'double lessons' to justify the additional time and cost of travel; ensure private swim times; have later after school swimming sessions to take account of extra travel time needed'.

Older people 50+ (464):

The majority of older respondents were female (56%). The majority of respondents said that they did not use HSP to swim (67%). Of those that do use HSP 43% use it once a week and 38% use it most days. The majority access HSP by car, a third walk and 6% use the bus. The majority of older people who responded only use HSP to swim, but 30% said that they use other facilities to swim too. 54% felt that Option 1 (transfer) would still have an impact on them, while 46% felt that it would not. 82% of older people felt that Option 2 (closure) would impact on them 'a lot'. While over half said they would not be able to use another facility should Option 2 have to be pursued, 26% said they could use somewhere else. 17% of older respondents didn't know if they would be able to use somewhere else. This suggests there is a need for further awareness raising/ signposting support with these groups should Option 2 have to be pursued. Just over half of older respondents felt that it would help reduce the impact on them if the Council / Trust tried to help them find an alternative facility / water time. A fifth said that this would not help them at all. 53% said they would not attend other sessions elsewhere if we could look to re-provide, however

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46% would.

Cross cutting factors /impacts

There are a number of factors identified throughout the consultation that are recognised as cross cutting impacts.

Transport / Travel & Costs

It is recognised that if Option 2 (closure) was to be pursued, transport/travel and associated cost issues to alternative locations/facilities could have an impact for some current user groups.

If users had to move to Marl Pits (MP) suggestions arising from consultation include:

- Providing free transport / bus transfer to MP
- Reduce the cost of swimming at MP to compensate for additional travel costs.
- Improve transport connections to MP
- Possible discussions with Rossendale Transport to support an improved bus service to MP from Haslingden?
- Provide subsidised transport

Cost of travel and access to swimming / price increases

- Extra costs for RLT members to use a pool locally that isn't part of their membership fee as run by someone else
- Wouldn't be able to use smyl card
- Increased costs for those on low/tight incomes – wouldn't be able to swim

Other facilities becoming busier / customer satisfaction

Consultation identified concerns about possible effects on how busy other facilities would become and customer satisfaction.

It is recognised that if the Option 2 (closure) was to be pursued, a potential impact could be that the relocation of users to other locations, namely Marl Pits, could become much busier/full and have an impact on customer satisfaction / service provision to existing customers. However, it should be noted that this is not specifically in relation to impacting on a particular protected equality group that we are aware of currently.

The consultation identified that both HSP users and Marl Pits users were concerned about the capacity at Marl Pits and not being able to accommodate everyone from MPs. Suggestions include extending the opening hours of MPs to help accommodate increased demand.

Options for disposal – overview

All respondents were asked to consider what they felt should be done with the site should the option to close the pool have to be pursued: aside from the desire for the pool to either remain open or a new pool to be built on the same site or at HSC. There is a diverse perspective on what should be done with the site if Option 2 was pursued, responses include

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	<p><u>Ideas of future use of the site</u></p> <ul style="list-style-type: none"> - A sports field for all - Keep the site sports related - Swap with HPS field on St. Peter's Avenue - Another sports facility that is cheaper to run - Affordable housing / community / social housing - Adventure playground - Facility for local recreational use - An alternative type of privately owned leisure facility - Green area - Community garden / meeting place / vegetable patch - Demolition and clearance of site would be expensive...sell site 'as is' for redevelopment - Car parking for Haslingden Primary School - Further health beneficial equipment/area suitable for all the family - Low level bungalows - Housing for older / vulnerable people - Replace with a community centre for the local area - Utilise for some sort of leisure from a private organisation – e.g. soft play, climbing centre, lazer quest etc. - Astra turf surface for ball games - Sell it and use the money to help build a new one at HSC. - Make sure the money from sale goes into the community of Haslingden nowhere else. - Skate park - Something beneficial to the local community / people of Haslingden - Just leave as an open space - Something for young people / Haslingden youth - Community centre with children's playground - Something for women and children like a community centre with reasonable rates - A cultural facility - Site should still have physical activities available for the local community - Sports hall or community centre for young people <p><u>Concerns / things people do not want to see done.</u></p> <p>Don't allow it to become vandalised Don't just leave it boarded up Anything but another piece of tarmac like the Valley Centre No more housing or takeaways No pubs or off licences Not a supermarket Do not sell for private development For full details of consultation response see HSP Options Consultation Report in background documents.</p>
Health bodies – consultation feedback	As part of the consultation, feedback was received from Lancashire County Council (LCC) and NHS East Lancashire Clinical Commissioning Group (CCG). Both responses concluded while there were health benefits of swimming activity, they would not be able to support future funding to support continued operation of Haslingden Swimming Pool. They also stated that Haslingden Swimming Pool was

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	not considered a high public health / CCG priority at the moment.
Expressions of Interest received for Option 1 – Transfer responsibility for the pool to another organisation	<p>In order to support the consultation process, in particular to facilitate / support Option 1, during March – April 2013 the opportunity for interested parties to submit expressions of interest to take over the management/operation of Haslingden Swimming Pool was opened up.</p> <p>Two expression of interest were received and one Community Asset Transfer Expression of Interest was received. All parties have been asked to submit a detailed business case by 9th August 2013.</p> <p>The consultation identified that there a majority of those that responded, 80% or more across all types of respondents, agreed with option 1 (transfer of ownership). Although about half of all types of respondents felt that Option 1 would still have some kind impact on them, the qualitative responses indicate both positive and negative impacts were identified as identified in the EIA and Evidence Appendices.</p> <p>When asked if, in order to keep the pool open via a third party organisation, would people support a small increase in price, changing of opening times and changes water time allocation, the majority said they would support small changes to these aspects.</p> <p>It should be noted that schools were less inclined to support a change to price and water time allocation and specific swim session users were a less inclined to support prices changes.</p>
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 - Break down of user groups 	<p>Tables and usage figures year on year for Haslingden Swimming Pool.</p> <p>A steady decline since 2007/08. The 2012-13 headcount shows a slight increase. This is due to Marl Pits being closed for refurbishment for six weeks during the summer of 2012.</p> <p>Table 2 shows that general swimming aside, the top 3 highest head count on a weekly basis is:</p> <p>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>From ongoing discussions between the Borough Council and Leisure Trust, the Trust have identified if it is likely that the majority of the current user groups for specific swim sessions at HSP could be accommodated at other facilities/locations. However it is recognised that as far as is reasonably possible, it will not be possible to re-accommodate all current users as detailed below. Other cross cutting impacts such as travel/costs/inconvenience are also noted. See above.</p>

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In particular the following is recognised:

Confirmed displaced

- 3 disabled users (1 hour per week, per user)
- 2 special needs schools from outside the Borough (1 hour per week per school)

There are 3 disabled users from outside the borough who currently access one to one swimming sessions at HSP on a weekly basis who would be impacted on should the pool have to close. All need the sole use of the pool to accommodate their specific needs.

- 2 children with various conditions who use the pool on a weekly basis weekly
- 1 adult who is blind and has learning/ behavioural difficulties

Consultation has been undertaken with these users and their carers to understand their needs. Currently Rossendale Leisure Trust cannot re-provide for these disabled one-to-one user within Trust facilities due to their specific need for whole facility use. Discussions are being had with CLAW to see if Whitworth Pool can accommodate these user's needs. Further discussions are needed between RLT, the users and the relevant Social Services to determine whether suitable alternatives could be found and sign posting to private swimming providers has been shared with these users.

There are two special needs schools from outside of the Borough that currently use HSP on a weekly basis as part of the set school sessions programme, they are:

- Linkway House Residential School, Burnley
- Oswaldtwistle School

Rossendale schools, Belmont School and Tor View School are now accommodated at other facilities within the Borough.

With re-programming, weekend water time access has been offered at Marl Pits as an alternative to the special needs schools, however this was not compatible with their desire to keep swimming within the mainstream education programme for its pupils. Therefore, RLT cannot re-provide for the two current school users. However, signposting to private swimming providers has been provided to the schools to help them identify alternative facilities within their local authority areas or elsewhere. Discussions are also being had with CLAW to see if Whitworth Pool can accommodate these user's needs.

Possibly displaced

- Dive club (1hour per week for 10 weeks per year) *not a protected equality group

The minimum depth for diving training is not specified but some of the training components need a minimum depth. The diving club has advised that 2.5m (depth of Haslingden Pool) is just enough to achieve this. Therefore, unfortunately the dive club could not be accommodated at Marl Pits Pool. Many diving clubs train in pools of 3m depth.

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RLT will continue to support this group in their efforts to find an alternative venue, as far as is reasonably possible. Possible alternative for this group have been identified at Bury Pool, Hyndburn Pool and Padiham Pool. All host diving clubs and signposting information has been shared with the clubs for them to consider.

- Haslingden Swimming Club (7 hours per week) *not a protected equality group

Haslingden swimming club are the largest of the Rossendale Swimming clubs and currently have significant pool time at HSP. Discussions are continuing with the borough's 3 swimming clubs via the swimming forum to find the most effective way to accommodate the clubs. A joint solution is being explored for one club rather than 3 separate clubs in order to make maximum use of the limited time available within the programme for club swimming. The outcome of this will also have an impact on what other swim sessions can be accommodated in the re-programming.

- Some children's lessons (up to 52 x 1 hour per week)

Children's lessons are available at other alternative locations: Marl Pits, Ramsbottom, Whitworth and Hyndburn pool, so these user groups could be accommodated at other locations. As of November 2012, Whitworth Swimming operates swimming lessons for 23 hours per week. As of November 2012 Ramsbottom Swimming Pool are operating 20 hours per week.

Scheduling of more swimming lessons at Marl Pits pool to accommodate the children's lessons would need to be considered. This is still being explored and it is depended on a joint solution being identified for the borough's 3 swimming clubs.

- Some schools(up to 12 x 1 hour per week)

School lessons are available at both Marl Pits and Hyndburn pool as alternatives. Work to determine the capacity in the pool re-programming is still under development by the Leisure Trust in close consultation with all schools who currently use RLT facilities to swim.

We are still awaiting full confirmation from all schools as to whether they wish to book water time for the year ahead. Once the schools have clarified their demand to RLT, reprogramming can be completed in discussion with the schools directly to determining timings. The Trust is confident that it will be able to accommodate all schools can be re-provided for.

It should be noted that there has been a slight reduction in school bookings due to their own efficiency savings challenges.

Where other protected equality groups identified as a possible impact mitigating actions have been explored /put in place as far as possible to provide as alternative sessions for these groups. Full details of other affected groups and mitigating actions considered are explored in the EIA Evidence Appendices.

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	<p>General cross cutting factors to take into account are (or see above):</p> <ul style="list-style-type: none"> - Difficulties in accessing alternative facilities - Transport/travel issues to alternative locations - Increase costs - Possible affect on how busy other facilities would become and customer satisfaction. - Health and wellbeing (physical, social and mental) impacts
Appendix 4 details of Schools using Haslingden Pool (Provided by RLT)	<p>9 primary schools use HSP for weekly school swimming sessions, for which 12 separate swim sessions are run weekly.</p> <p>In addition, 2 secondary schools use the pool on an ad hoc basis largely for swimming galas. RLT would be able to accommodate this at other RLT facilities within the re-programming. In addition, as an alternative if needed, school lessons are available at both Marl Pits and Hyndburn pool. It may be necessary for RLT to liaise with Hyndburn, Ramsbottom and Whitworth pools to assess whether those pools have any capacity for additional school swimming lessons if needed.</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> 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 and/or those without access to a car.</p> <p>Bus route data indicates that additional bus journeys would be required should Option 2 to close Haslingden Swimming Pool be pursued.</p> <p>Bus route journey details and sample fare information is set out in Appendix 7 of the EIA Evidence Appendices.</p> <p>This data tells us that current users of HSP who do not have access to a car would be required to take either one bus and a walk up an incline</p>

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	<p>between Peel Street and Marl Pits; or two buses direct to Marl Pits. Journeys via public transport to other alternative facilities would also require one or more business journeys of anything between 21 minutes to just over one hour.</p> <p>It is recognised that Option 2 would have a cost and travel time impact for some users with and without protected equality characteristics.</p> <p><u>The survey on location of pool users:-</u> While the majority of Haslinden 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 10 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 users specific sessions therefore with the information available it is not possible to determine the level of potential impact of option 1 or 2 for this group. However, consultation has been undertaken with a very small number of BME Haslingden Swimming Pool users - see above.</p>
RLT Membership & passport to active living and smyl scheme	<p>Rossendale Leisure Trust currently operates two discounted / concessionary membership passes; passport to active living and the smyl card scheme. There are 1,456 members / subscriptions to these. It is recognised that these would be affected should Option 1 to transfer ownership be pursued.</p> <p>As a membership based organisation, RLT membership holders, regardless of whether the have a protected equality characteristic or not, would also no longer be able to access HSP should ownership be transferred to another third party organisation.</p>

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3. EQUALITY IMPACT

OPTION 1: TRANSFER RESPONSIBILITY FOR THE POOL TO ANOTHER ORGANISATION

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 type="checkbox"/>	At this stage no significant adverse impact has been identified for any protected equality group. This would need to be considered further as part of the due diligence and negotiation process with any transferring organisation before a decision is made.	<input checked="" type="checkbox"/>
	Younger people and children	<input type="checkbox"/>	<input type="checkbox"/>	As above.	<input checked="" type="checkbox"/>
Disability	Physical/learning/mental health	<input type="checkbox"/>	<input type="checkbox"/>	As above.	<input checked="" type="checkbox"/>
Gender Reassignment	Transsexual people	<input type="checkbox"/>	<input type="checkbox"/>	As above.	<input checked="" type="checkbox"/>
Pregnancy and Maternity		<input type="checkbox"/>	<input type="checkbox"/>	As above.	<input checked="" type="checkbox"/>
Race (Ethnicity or Nationality)	Asian or Asian British people	<input type="checkbox"/>	<input type="checkbox"/>	As above.	<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 above (please state)	<input type="checkbox"/>	<input type="checkbox"/>	As above.	<input checked="" type="checkbox"/>
Belief or Religion		<input type="checkbox"/>	<input type="checkbox"/>	As above.	<input checked="" type="checkbox"/>
Gender	Women	<input type="checkbox"/>	<input type="checkbox"/>	As above.	<input checked="" type="checkbox"/>
	Men	<input type="checkbox"/>	<input type="checkbox"/>	As above.	<input checked="" type="checkbox"/>
Sexual Orientation	Lesbian women, gay men and bisexual people	<input type="checkbox"/>	<input type="checkbox"/>	As above.	<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 checked="" type="checkbox"/>	<input type="checkbox"/>	Potential positive impact by enabling all groups to continue to utilise the facility.	<input 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"/>

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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 <u>or</u> reasons why it will be of positive benefit or contribution)	No Impact
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 Rights Act 1998.	<input checked="" type="checkbox"/>

OPTION 2: TO CLOSE THE POOL AND CONSIDER SITE DISPOSAL OPTIONS

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 <u>or</u> reasons why it will be of positive benefit or contribution)	No Impact
Age	Older people	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Negative impact on this group has been identified however the over 50s swim sessions could be accommodated at Marl Pits or other locations. There are other Health Suites outside of RLT facilities within and outside of the Borough.</p> <p>Possible cross cutting travel /cost impact in relation to the nearest alternatives.</p> <p>Mitigating actions have been put in place as far as possible to provide as alternative sessions for this group. Recognise that we cannot completely remove all impacts to this group.</p> <p>Appendix 3 sets out possible mitigating actions.</p>	<input type="checkbox"/>
	Younger people and children	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Negative impact on this group has been identified - parent and toddlers / children's swim sessions and school swim sessions. With re-programming it is likely that all schools and some of the	<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 <u>or</u> reasons why it will be of positive benefit or contribution)	No Impact
				<p>children’s lessons could be accommodated. Work with RLT and schools is on-going to determine actual school demand for swimming in the year ahead to complete re-programming. Awaiting confirmation from schools.</p> <p>Mitigating actions have been put in place as far as possible.</p> <p>Possible cross cutting travel /cost impact in relation to the nearest alternatives.</p> <p>Recognise that we cannot completely remove all impacts to these groups.</p> <p>Appendix 3 sets out all possible mitigating actions.</p>	
Disability	Physical/learning/mental health	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Negative impact on this group has been identified.</p> <ul style="list-style-type: none"> • 3 disabled users (1 hour per week, per user) • 2 special needs schools from outside the Borough (1 hour per week per school) <p>There are 3 disabled users from outside the borough. All need the sole use of the pool to accommodate their specific needs.</p> <p>Consultation has been undertaken with these uses and their carers to</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 <u>or</u> reasons why it will be of positive benefit or contribution)	No Impact
			<p>understand their needs. Currently Rossendale Leisure Trust cannot re-provide for these disabled one-to-one user within Trust facilities due to their specific need for whole facility use. Discussions are also being had with CLAW to see if Whitworth Pool can accommodate these user's needs. Further discussions are needed between RLT, the users and the relevant Social Services to determine whether suitable alternatives could be found and sign posting to private swimming providers has been shared with these users.</p> <p>There are two special needs schools from outside of the Borough that currently use HSP on a weekly basis as part of the set school sessions programme, they are:</p> <ul style="list-style-type: none"> • Linkway House Residential School, Burnley • Oswaldtwistle School <p>Rossendale schools, Belmont School and Tor View School are now accommodated at other facilities within the Borough.</p> <p>With reprogramming, weekend water time access has been offered at Marl Pits as an alternative to the special needs schools, however this was not compatible with their desire to keep swimming within the mainstream education programme for its pupils.</p>	

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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 <u>or</u> reasons why it will be of positive benefit or contribution)	No Impact
				<p>Therefore, RLT cannot re-provide for the two current school users. However, signposting to private swimming providers has been provided to the schools to help them identify alternative facilities within their local authority areas or elsewhere. Discussions are also been had with CLAW to see if Whitworth Pool can accommodate these user's needs.</p> <p>Possible cross cutting travel/cost impact issues in relation to the nearest alternatives.</p> <p>Mitigating actions have been considered and/or put in place as far as is possible. Recognise that we cannot completely remove all impacts to these groups.</p>	
Gender Reassignment	Transsexual people	<input type="checkbox"/>	<input type="checkbox"/>	No information identified to suggest an adverse impact on this protected equality group. Possible cross cutting travel/cost impact issues in relation to the nearest alternatives.	<input checked="" type="checkbox"/>
Pregnancy and Maternity		<input type="checkbox"/>	<input type="checkbox"/>	Currently no aqua natal sessions offered at Haslingden Pool, therefore no impact has been identified for this group. No information has been identified to suggest an impact on this group. Possible cross cutting travel/cost impact issues in relation to the nearest alternatives.	<input checked="" type="checkbox"/>
Race (Ethnicity or Nationality)	Asian or Asian British people	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Ethnicity data of customers at HSP is not collected. Consultation with a very small number of BME (Asian/Asian British)	<input type="checkbox"/>

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			<p>users despite efforts to engage this group. The majority of BME users that did respond, said they access the pool by car. Half of BME respondents said they also use other RLT facilities too. A third of BME respondents said they would be able to use another facility nearby to swim.</p> <p>Consultation also identified the need to ensure the needs of Asian women were taken into account when considering re-programming and/or transfer of ownership.</p> <p>Possible cross cutting travel/cost impact issues in relation to the nearest alternatives.</p> <p>Recognise that we cannot completely remove all impacts to these groups.</p>	
	Black or black British people	<input type="checkbox"/>	No information identified to suggest an adverse impact on this protected equality group. Possible cross cutting travel/cost impact issues in relation to the nearest alternatives.	<input checked="" type="checkbox"/>
	Irish people	<input type="checkbox"/>	As above	<input checked="" type="checkbox"/>
	White British	<input type="checkbox"/>	As above	<input checked="" type="checkbox"/>
	Chinese people	<input type="checkbox"/>	As above	<input checked="" type="checkbox"/>
	Gypsies & Travellers	<input type="checkbox"/>	As above.	<input checked="" type="checkbox"/>
	Other minority communities not listed above (please state)	<input type="checkbox"/>	As above	<input checked="" type="checkbox"/>
Belief or Religion		<input type="checkbox"/>	No information identified to suggest an adverse impact on this protected equality	<input checked="" type="checkbox"/>

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				group. Possible cross cutting travel/cost impact issues in relation to the nearest alternatives.	
Gender	Women	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Negative impact has been identified for this protected equality group. However, the ladies only swim sessions could be accommodated at Marl Pits or other facilities as an alternative.</p> <p>Mitigating actions have been considered and/or put in place as far as is possible.</p> <p>Possible cross cutting travel/cost impact issues in relation to the nearest alternatives.</p> <p>Appendix 3 sets out possible mitigating actions.</p> <p>Recognise that we cannot completely remove all impacts to this group.</p>	<input type="checkbox"/>
	Men	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>Negative impact identified for this protected equality group. No current men's only swim sessions are provided. However, alternative adult only, early bird or general public swim sessions are available at Marl Pits and other locations.</p> <p>Possible cross cutting travel/cost impact issues in relation to the nearest alternatives.</p> <p>Mitigating actions have been considered and/or put in place as far as is possible.</p>	<input type="checkbox"/>

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			Appendix 3 sets out possible mitigating actions. Recognise that we cannot completely remove all impacts to this group.	
Sexual Orientation	Lesbian women , gay men and bisexual people	<input type="checkbox"/>	No information identified to suggest an adverse impact on this protected equality group. Possible cross cutting travel/cost impact issues in relation to the nearest alternatives.	<input checked="" type="checkbox"/>
Marriage and Civil Partnership (employment only)		<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
Contribution to equality of opportunity		<input type="checkbox"/>	A potential impact on equality of opportunity in relation to access to swimming services. However, as far is as reasonably possible, alternatives have been provided/signposted to. Possible cross cutting travel/cost impact issues in relation to the nearest alternatives. Recognise that we cannot completely remove all impacts to all groups.	<input type="checkbox"/>
Contribution to fostering good relations between different groups (people getting on well together – valuing one another, respect and understanding)		<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"/>	Any Council decisions will be undertaken in line with the Human Right Act 1998.	<input checked="" type="checkbox"/>

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

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 type="checkbox"/>
<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 checked="" type="checkbox"/> <p>The Council recognises the potential impacts based on the options being considered and has/will as far as is possible put in place mitigating actions to reduce this. However, it recognises that it cannot completely remove all impacts.</p>
<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.</p>	<input type="checkbox"/>

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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
Option 1 (transfer)			
Understand the equality impact of transfer	Clarify / confirm the positive and negative impacts of transfer as a consequence of the due diligence and negotiation process	Helen Lockwood	August/ September 2013
Option 2			
Impact of closure on current users	RLT to clarify/confirm alternative facilities / re-programming for current users potentially affected (awaiting confirmation of schools and swimming clubs);	RLT	July
	RLT to identify current users who require support identifying alternative facilities / signposting	RLT	
	Communication of closure to users	RLT & RBC	TBC
Impact on immediate community if closure pursued	Ensuring that the building is safe and secure.	RBC	TBC
	Communication about this with the local community is vital.	RBC	
	Consideration of disposal	RBC	
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	options would need to be taken into account and possibly a further impact assessment undertaken.		
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Please add more rows if required.

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 has been updated following consultation and will be sued by Elected Members to inform their decision making.

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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