

# Equality & Poverty Impact Assessment 00427 (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 - Closure of Polmont Sports Centre	<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>	<p>Parents and guardians of children attending classes and clubs.</p> <p>Separate EPIA required for employees effected by the proposed closure.</p> <p>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.</p>
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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 Sports Centre to determine options for the council going forward. The aim is to identify a net zero operating model with no financial risk to the council.
20/02/2023	Gap in information on sports clubs and coaches 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 commercial performance improvement as the appropriate course of action for Polmont Sports Centre to continue to provide a positive destination for the community to participate in sport and deliver on the councils health & wellbeing objectives.
18/01/2024	Phase 3 property and EPIA will be updated during 2024.

Identify the main aims and projected outcome of this proposal (please add date of each update):	
11/12/2024	<p>Latest recommendation is that Polmont Sport Centre closes from 1 April 2025 in absence of a successful community asset transfer expression of interest by 31 March 2025.</p> <p>Section 2 - financial information updated  Section 3A - Admission updated  Section 3 - Best judgement updated  Section 5 &amp; 6 - Updated  Section 7 - Lead Officer updated  Section 8 - 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:	£105,610 net position (excluding central costs)	2022/23 year end projection
		£133,114	2022/23 year end expenditure
		£99,860	2022/23 year end net position
		£145,395	2023/24 year end expenditure
		£109,201	2023/24 year end net position
		£152,130	2024/25 Projected year end expenditure
		£112,680	2024/25 Projected year end net position.
Reduction to this service budget (£'0000s)	Per Annum:		
Increase to this service budget (£'000s)	Per Annum:		
If this is a change to a charge or concession please complete.	Current Annual Income Total:		
	Expected Annual Income Total:		
If this is a budget decision, when will the saving be achieved?	Start Date:	01/04/2025	
	End Date (if any):	01/04/2027	

**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, disability, sex

2022/23 projected year end total admissions = 18,580 visits

2021/22 total admissions = 14,423 visits

2021/22 General activity admissions = Adult 4,691 (32%), Junior 8,451 (59%) Go Card 1,317 (9%). Gender, age and postcode are not captured for general admissions.

2022/23 Sports Development Classes to end Q3 = 7,182 admissions

Gender split - 31% female, 67% male, 2% not specified.

90% of participants in the sports development programme are aged under 12 years. 9% are aged under 16 years and 1% adults.

Dec 2024 Update

2022/23 Actual admissions = 18,768

2023/24 Actual admissions = 21,051

**B - Qualitative Evidence**

This is data which describes the effect or impact of a change on a group of people, e.g. some information provided as part of performance reporting.

**Social - case studies; personal / group feedback / other**

Council carried out a series of public consultation meetings and online surveys for communities to provide feedback on SPR proposal. Email correspondence was also accepted.

85 survey responses received from users of the facility (72), on behalf of a community group / organisation (1), residents of the ward (10), not answered (2)

Gender of responses received - female 43, male 37, not answered 5.

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

The age profile of respondents

16 - 24 years - 1 responses, 25 - 44 years - 38 responses, 45 - 64 years - 31 responses, 65+ years - 10 responses, not answered 5 responses.

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

Summary of comments received:

Negative impact on the community with the loss of a venue offering a wide range of sports, lack of capacity within existing sports venues, viability of using schools as an alternative location, physical & mental health and wellbeing, access to transport and associated costs to travel were the most common concerns raised.

Summary of responses stating protected characteristics:

**AGE:** 7 responses, 4 state they have a physical or mental health condition expected to last longer than 12 months. Of the 7 responses, 3 are female, 4 male.

45 - 64 years received the most responses with 3, 25 - 44 years and 65+ both received 2 responses.

Negative impact on physical and mental health, ability to travel to an alternative venue and age discrimination against young people and the elderly were the most common concerns raised. Concerns over the viability of accessing schools as an alternative venue were also noted.

**DISABILITY:** 3 responses, all state they have a physical or mental health condition expected to last longer than 12 months. Of the 3 responses, 2 are female, 1 male. All responses were received from 25 - 44 years age category.

Negative impact on ability to travel to an alternative venue was the main concern.

**SEXUAL ORIENTATION. MATERNITY / PREGNANCY:** both received 1 response each. Viability of relocating to alternative venue, impact on physical health and

loss of social interaction were the most common concerns raised.

MARITAL STATUS: 3 response, 2 state they have a physical or mental health condition expected to last longer than 12 months. Of the 3 responses, 2 are female, 1 male. All responses were received from 25 - 44 years age category.

Viability of relocating to alternative venue, impact on physical health and loss of social interaction were the most common concerns raised.

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 venue.
What gaps in data / information were identified?	Gaps in information on pay as you go customers, sports clubs and coaches to measure against protected characteristics. Admissions data does not identify the number of unique users or record 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 venue.

**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	<p>Council online survey for interested parties to provide feedback on SPR proposals.</p> <p>85 survey responses received from users of the facility (72), on behalf of a community group / organisation (1), residents of the ward (10), not answered (2)</p> <p>71 respondents stated they would be disproportionately affected by the SPR proposal for this venue.</p>
<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 Polmont Sports Centre.
<b>Other: please specify</b>		
<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>	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.
<b>Age</b>			✓	<p>See evidence in section 3 on split of age groups.</p> <p>Further work required to understand the impacts on each age group should the venue close.</p> <p>Dec 2024 Update: Whilst the majority of the wider Sports Development Programme participants are young people (&lt;12yrs), the closure will impact users of all ages. Opportunity for community asset transfer of properties and proposals for new sport and leisure facilities to be considered at Braes High School.</p>
<b>Disability</b>			✓	<p>See evidence in section 3 on Disability. Health inequalities, age and poverty are the key area identified.</p> <p>Further work required to understand the impact on customers with disabilities, their carers should the venue close.</p> <p>Dec 2024 Update: Whilst detailed information on users with disabilities is not available, it is anticipated that those who may have disabilities will be impacted by the closure of the venue and the requirement to travel for alternative facilities. Opportunity for community asset transfer of properties and proposals for new sport and leisure facilities to be considered at Braes High School.</p>
<b>Sex</b>	✓			No specific impacts have been identified. Whilst the majority of service users are male, the closure will affect members of both sexes.
<b>Ethnicity</b>	✓			No specific impacts have been identified.
<b>Religion / Belief / non-Belief</b>	✓			No specific impacts have been identified.
<b>Sexual Orientation</b>	✓			No specific impacts have been identified.



**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>Marriage / Civil Partnership</b>	✓			No specific impacts have been identified.
<b>Poverty</b>			✓	<p>See evidence in section 3 on Poverty . Health inequalities, and disability are the key area identified for this group.</p> <p>Further work required to understand the impact on income SIMD demographics, customers should the venue close.</p> <p>Concern over potential price increases and cost of travel will result in user no longer being able to afford to continue in sporting activities.</p> <p>Dec 2024 Update: Whilst detailed information on users economic circumstances is not available, it is anticipated that those experiencing the affects of poverty may be impacted by the closure of the venue and the requirement to travel for alternative facilities. The Polmont area is noted on the SIMD to be within some of the least deprived areas. Opportunity for community asset transfer of properties and proposals for new sport and leisure facilities to be considered at Braes High School.</p>
<b>Care Experienced</b>	✓			No specific impacts have been identified.
<b>Other, health, community justice, carers etc.</b>	✓			No specific impacts have been identified.
<b>Risk (Identify other risks associated with this change)</b>	<p>Reputational damage to the council on the impact of the closure will have on its ability to deliver on its physical and mental health &amp; wellbeing agenda as stated in the council plan.</p> <p>Young people do not have the opportunity to start early habits of physical activity that they carry on with them into later life.</p>			

**Evidence of Due Regard**

<b>Eliminate Unlawful Discrimination (harassment, victimisation and other prohibited conduct):</b>	<p>The closure of this venue will affect all users and some negative impacts on specific protected characteristic groups have been identified, however there is little scope for mitigation.</p> <p>Dec 2024 Update: Opportunity for community asset transfer of properties and proposals for new sport and leisure facilities to be considered at Braes High School.</p>
<b>Advance Equality of Opportunity:</b>	<p>Detailed information required to understand the impact to customers and the wider community against each of the protected characteristics.</p> <p>Community engagement was undertaken to ensure the views of all interested parties were considered.</p> <p>Dec 2024 Update: Opportunity for community asset transfer of properties and proposals for new sport and leisure facilities to be considered at Braes High School.</p>
<b>Foster Good Relations (promoting understanding and reducing prejudice):</b>	<p>Closure of this venue would reduce opportunities for people to come together in an informal setting.</p> <p>The proposal do not create scope to foster good relations between different protected characteristic groups. There is some risk that the proposals may reduce the capacity to do so by removing assets used by communities.</p> <p>Dec 2024 Update: Opportunity for community asset transfer of properties and proposals for new sport and leisure facilities to be considered at Braes High School.</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.
<b>Business</b>	Yes	Businesses operating out of the venue. Out with the community consultation process there has been no engagement with local businesses.
<b>Councils</b>	Yes	Negative impact on the council's ability to deliver on its physical and mental health & wellbeing agenda as stated in the council plan.  Dec 2024 Update: Proposals for new sport and leisure facilities to be considered at Braes High School.
<b>Education Sector</b>	No	
<b>Fire</b>	No	
<b>NHS</b>	Yes	Closure of the venue will impact on the council's ability to deliver its physical and mental health & well being agenda as stated in the council plan. Additional strain on NHS Services. Out with the community consultation process there has been no engagement with NHS.  Dec 2024 Update: Proposals for new sport and leisure facilities to be considered at Braes High School.
<b>Integration Joint Board</b>	Yes	Closure of the venue will impact on the council's ability to deliver its physical and mental health & well being agenda as stated in the council plan. Additional strain on IJB Services. Out with the community consultation process there has been no engagement with IJB.  Dec 2024 Update: Proposals for new sport and leisure facilities to be considered at Braes High School.
<b>Police</b>	No	
<b>Third Sector</b>	Yes	Sports Clubs - Direct communication to all user groups advising of SPR proposals to close pavilions, outlining opportunities for groups to take ownership of venue.  Dec 2024 Update: Proposals for new sport and leisure facilities to be considered at Braes High School.

**Other(s): please list and describe the nature of the relationship / impact.**

## SECTION SEVEN: ACTION PLANNING

**Mitigating Actions:** If you have identified impacts on protected characteristic groups in Section 5 please summarise these in the table below detailing the actions you are taking to mitigate or support this impact. If you are not taking any action to support or mitigate the impact you should complete the No Mitigating Actions section below instead.

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Age	All age groups	<p>Mitigate against closure through delivery of a commercial performance improvement plan.</p> <p>Develop action plan to increase income generation, reduce costs to achieve net zero subsidy.</p> <p>Retaining the venue will provide the community with a positive destination to participate in sport, health &amp; fitness and deliver on the councils health &amp; wellbeing objectives.</p> <p>Further analysis required on impact of closure against protected characteristics on customers and the wider community.</p> <p>Dec 2024 Update: Proposals for new sport and leisure facilities to be considered at Braes High School. The property will remain available for community asset transfer.</p>	R Hammond R Macaloney		<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
Disability	Community	<p>Mitigate against closure through delivery of a commercial performance improvement plan.</p> <p>Develop action plan to increase income generation, reduce costs to achieve net zero subsidy.</p> <p>Retaining the venue will provide the community with a positive destination to participate in sport, health &amp; fitness and deliver on the councils health &amp; wellbeing objectives.</p> <p>Further analysis required on impact of closure against protected characteristics on customers and the wider community.</p> <p>Dec 2024 Update: Proposals for new sport and leisure facilities to be considered at Braes High School. The property will remain available for community asset transfer</p>	<p>R Hammond 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	<p>Mitigate against closure through delivery of a commercial performance improvement plan.</p> <p>Develop action plan to increase income generation, reduce costs to achieve net zero subsidy.</p> <p>Retaining the venue will provide the community with a positive destination to participate in sport, health &amp; fitness and deliver on the councils health &amp; wellbeing objectives.</p> <p>Further analysis required on impact of closure against protected characteristics on customers and the wider community.</p> <p>Dec 2024 Update: Proposals for new sport and leisure facilities to be considered at Braes High School. The property will remain available for community asset transfer</p>	R Hammond R Macaloney		<p>Council Plan</p> <p>Supporting stronger &amp; healthier communities</p>

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 30th January 2025 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	Community engagement was undertaken to ensure the views of all interested parties were considered.  Dec 2024 Update: Proposals for new sport and leisure facilities to be considered at Braes High School. The property will remain available for community asset transfer.
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

<b>OVERALL ASSESSMENT OF EPIA:</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?	Yes
<b>ASSESSMENT FINDINGS</b>		The consultation showed that closure of this venue most likely to impact on age and sex protected characteristics	
If YES, use this box to highlight evidence in support of the assessment of the EPIA			
If NO, use this box to highlight actions needed to improve the EPIA			
<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	<p>If YES, please describe:</p> <p>It is proposed that a commercial performance improvement plan be used to mitigate against closure of this venue. The impact of this on the community should continue to be assessed and monitored as proposal developed</p> <p>January 2025 - update - there is a proposed mitigation that new sport and leisure facilities are considered at Braes High School, and the property will remain available for community asset transfer.</p>

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	Medium impact identified. Whilst negative impacts have been identified as arising from the proposed closure, these may be mitigated by proposals.
LOW	Yes / No	

## SECTION ELEVEN: CHIEF OFFICER SIGN OFF

<b>Director / Head of Service:</b>			
<b>Signature:</b>	Michael McQuinness	<b>Date:</b>	08/01/2025