


Equality Impact Analysis (EIA) – impact on residents, service users and wider community

Section 1: Introduction

Name of proposal
For the purpose of this document, 'proposal' refers to a policy, function, strategy or project
Leisure Recommissioning
Service area and Directorate responsible
Sport & Physical Activity – Children and Culture
Name of completing officer
Michael Coleman, Interim Leisure Programme Director
Approved by (Corporate Director / Divisional Director/ Head of Service)
James Thomas, Corporate Director of Children and Culture
Date of approval
14/07/2022

Conclusion

Conclusion	Current decision rating (see Appendix A)
Based on the finding of the EIA, the proposal can proceed so long as mitigating actions are taken to ensure the existing engagement with residents and other stakeholders is ongoing through the development of the specification for the contract model. If it is decided not to use outsourcing as the delivery	

model for the Leisure Service from 1/5/2024 onwards, a formal consultation will be needed to gain views on the proposed use of an alternative.	
--	--

The Equality Act 2010 places a ‘General Duty’ on all public bodies to have ‘due regard’ to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between those with ‘protected characteristics’ and those without them
- Foster good relations between those with ‘protected characteristics’ and those without them

This Equality Impact Analysis provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above. For more information about the Council’s commitment to equality, please visit the Council’s [website](#).

Section 2: General information about the proposal

Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010
--

The Council is committed to meeting four physical activity and sports priorities, as set out in the Physical Activity and Sports Strategy 2019-24:

1. Developing young interest
2. Driving health change
3. Shaping places and communities
4. Physical activity and sport as a community engagement tool

These priorities are in part met through the physical assets that the Council owns – its leisure centres. The Council has 7 leisure centres (‘the leisure estate’) across the Borough, currently operated by GLL under a contract that expires in April 2024.

The recommendations set out in the report being presented to Cabinet on 1 August are for a new outsourced contract to be procured, which will contribute to delivering the priorities set out above.

Leisure Service Management Contract Model

The Council’s Leisure Service is currently run by GLL, as an outsourced contract. A number of options have been reviewed, as set out below, for the future management of the estate. These have been tested using a rigorous options appraisal process that has applied balanced criteria to test how well they would deliver in the context of Tower Hamlets, in

particular in meeting the Council's objectives, and the potential impact upon different users.

Option	Description
Outsourcing	The Council procures a third-party operator to manage the Leisure Service on a fixed term contract basis (currently assumed to be for 10 years).
Full insourcing	Bring the management of the Leisure Service contract under direct Council control as part of an existing directorate
Joint venture (JV)	Create a joint venture with a third party or parties, which could include other local authorities and/or one or more private sector providers
Trust (Non-Profit Distributing Organisation)	Set up an independent trust (e.g. a charitable trust, or potentially a Public Service Mutual) to run the estate at 'arm's length'
Local Authority Trading Company (LATC)	Set up a wholly owned subsidiary of the Council, delivering the Council's specification
Dispose of leisure centre sites	Remove the leisure centres and associated facilities from Council ownership by selling off the assets. The leisure offer would in effect cease.
Long-term lease	Enter into a long-term lease for the buildings in the estate, but without an overarching management operation contract in place. Again, the leisure offer would in effect stop.
Extend the existing contract with GLL	This is included as a 'do minimum' option although it may need to be considered if there is insufficient time to put a replacement management service in place before 30 April 2024.

These options were then assessed using the following methodology:

Category	Criteria	Weighting
Financial		
Cost	<i>Extent of Council responsibility for/exposure to:</i>	30%
	Income generation	
	Economies of scale for key costs, including utilities	
	Salary levels (not relating to LGPS)	
	Overhead management costs	
	Profit	
	VAT treatment	
	Non-National Domestic Rates (NNDR)	
	Pension liabilities	
Risk transfer (commercial)	<i>Extent to which the Council has ownership of or influence over key risks:</i>	10%
	Day-to-day operations (e.g. costs resulting from unavailability of areas of a building)	
	Change of customer demand	
	Local competition	
	Change in law affecting operation/cost/ facility specification	
	Utility cost (tariff) changes	
	Utility cost (consumption) changes	
Uninsured risks		
Non-Financial		

Service delivery	Relative ability of each model to:	30%
	Deliver the Council's current strategic objectives for next 10 years	
	Work with other Council departments, e.g. Public Health, Parks, etc.	
	Deliver excellent customer service	
	Meet the Council's net zero objectives	
	Increase participation in the most economically and sustainable way	
	Engage with the most vulnerable groups within the borough	
Operational flexibility (for Council)	Ability to adapt to changes to the service within the period	20%
	Opportunities for cross-Council initiatives, e.g. joined up IT solutions across leisure/IDEA stores	
	Extent to which arrangement protects service in long-term (10 years)	
Risk transfer (operational)	Extent to which the Council has ownership of and influence over key risks:	10%
	Health and safety	
	Managing, recruiting and retaining staff	
	Planned preventative maintenance, including compliance checks	
	Investment to improve the estate	

The full methodology is set out in Appendix 3a of the Cabinet Report - Leisure Recommissioning & Investment Strategy. The non-financial analysis specifically considers equalities implications under the Service Delivery criteria in particular, although the relative flexibility of each option is also relevant in ensuring that the Leisure Service continues to meet the Council's duty under the Equality Act (as set out below). The current recommendation is to procure a new outsourced contract that would be operational from 1 May 2024. This was the stated objective when the Council undertook its consultation on the future of the Leisure Service (please see section 3 for further details).

Duty under the Equality Act

We have a duty under the Equality Act to "Advance equality of opportunity between those with 'protected characteristics' and those without them". To that end, officers have engaged with groups of residents and relevant organisations and health professionals to understand what specific design and/or operational issues need to be considered to meet this duty. A number of those identified to date include (but not exclusively):

- Changing facilities – separate facilities for men and women should be available in every building for all activities.
- Women only sessions should be available for key activities, e.g. swimming. These should ideally be run/overseen by female staff.
- Women only gyms should be provided in more facilities.
- Female changing rooms should be as close as possible to the facilities that it is anticipated will be used once changed.

- Building design should limit the extent of overlooking into areas being used by women to exercise.
- Specific sessions (e.g. studio-based physical programmes) to be considered for older residents only to boost participation by reducing self-consciousness.
- Leisure centres should, where practicable, provide spaces for social engagement as well as physical activity, e.g. a café or seating area that allows users to interact away from the gym, pool, etc. This will assist to address social isolation, particularly when combined with other initiatives to increase use by older residents.
- Seek to increase youth participation by investigating how to make access affordable and include a range of suitable activities to boost interest.
- Work with local Primary Care Networks on a more hyperlocal basis to improve opportunities for social prescribing. This operates currently but in a less systematic way than all parties would prefer.
- Investigate, alongside NHS colleagues, whether it is possible to make greater use of leisure centres by staff for treatment, e.g. physiotherapists having access to fitness gym equipment to assist with rehabilitation regimes.

Officers will continue to engage with residents, community and sports organisations, Public Health and NHS colleagues, and any other groups that represent residents with specific interests in how the Leisure Service operates. This engagement will assist to inform the full specification and contract model for the future operation of the Service, and the development of design proposals for the estate itself.

Section 3: Evidence (consideration of data and information)

What evidence do we have which may help us think about the impacts or likely impacts on residents, service users and wider community?

Sufficiency of the current leisure estate

The Council commissioned a study in 2017, **Indoor Sports Facilities Strategy**, to assess how closely its current provision of leisure facilities met current and anticipated future demand for leisure activities in the Borough, to determine whether there was sufficient provision for each activity that requires a given facility (e.g. a pool or a sports hall) and, if not, what the additional capacity required is. This demonstrated an overall shortfall in all recommended levels of provision for different activities, so that increasing available facilities would provide real benefit by addressing this shortfall. The tables below from the report illustrates the anticipated gap between existing and required facilities:

Figure 3: Table showing supply and demand projections for sports halls in Tower Hamlets for 2016, 2026 and 2031 –

Facilities	2016			2026		2031	
	Supply	Demand	Over or (under) supply	Demand	Over or (under) supply	Demand	Over or (under) supply
Sports halls (badminton courts)	62.75 badminton courts	99.08 badminton courts	(36.33) badminton courts	130.24 badminton courts	(67.49) badminton courts	132.14 badminton courts	(69.39) badminton courts
	Equivalent to 16 sports halls	Equivalent to 25 sports halls	Equivalent to 9 sports halls	Equivalent to 33 sports halls	Equivalent to 17 sports halls	Equivalent to 33 sports halls	Equivalent to 17) sports halls

Figure 7: Table showing supply and demand projections for swimming pools in Tower Hamlets for 2016, 2026 and 2031

Facility Type	2016			2026		2031	
	Supply	Demand	Over / (under) supply	Demand	Over/ (under) supply	Demand	Over/ (under) supply
Swimming Pools	1,932m ²	3,345m ²	(1,413)m ²	4,398m ²	(2,466)m ²	4,462m ²	(2,530)m ²
	Equivalent to 5 pools	Equivalent to 10 pools	Equivalent to (5) pools	Equivalent to 13 pools	Equivalent to (8) pools	Equivalent to 13 pools	Equivalent to (8) pools

Figure 11: Table showing supply and demand projections for health and fitness gyms in Tower Hamlets for –2016, 2026 and 2031 (based on daytime population)

Facility Type	2016	2016		2026		2031	
	Supply	Demand	Over/ (under) supply	Demand	Over/ (under) supply	Demand	Over/ (under) supply
Health and Fitness Gyms	2,228 fitness stations	2,699 fitness stations	(471) fitness stations	3,360 fitness stations	(1,132) fitness stations	3,400 fitness stations	(1,172) fitness stations

The gap between the supply and demand of facilities is typical of many inner London boroughs, where available suitable space and the availability of capital funding constrains what can be achieved. The analysis does, however, indicate a strong need for additional capacity in the borough, where practicable, to serve all residents including, of course, those with protected characteristics.

Levels of use pre-pandemic and post-lockdown

The Council has assessed data on pre and post-lockdown usage of the leisure estate, in particular St George's. This provides information on how many visits were made to each site, for what purpose, over time, as set out below:

Visits 2019/20	John Orwell	Mile End	Poplar	St George's	Tiller	WLC	York Hall	Total	% of total
Fitness (Gym)	50,595	101,695	34,304	8,370	23,972	36,697	42,418	298,051	15.5
Group Workout	5,341	24,609	4,374	213	1,477	6,006	12,627	54,647	2.8

Swimming lessons	n/a	100,688	60,546	75,955	25,256	n/a	70,188	332,634	17.3%
Swimming activities	4,677	86,586	41,301	52,095	20,512	10,788	83,097	299,056	15.5%
Sports Hall use (or studio as equivalent)	27,770	34,794	30,256	946	437	23,687	135	118,025	6.1%
Outdoor activities	7,667	230,184	4,369	102	1,756	35,483	852	280,413	14.6%
Other activities	56,042	182,353	71,447	13,675	10,150	11,660	197,026	542,353	28.2%
Total	152,092	760,909	246,597	151,356	83,560	124,322	406,343	1,925,179	100%
% of total	7.9%	39.5%	12.8%	7.9%	4.3%	6.5%	21.1%	100%	

All leisure centres were open until 23rd March 2020 in the year shown above. Example data for usage taken from one month (July 2021) in the period since the pandemic began, compared to the previous year, is shown in the table below:

Leisure Centre	Av. monthly use Apr-Jan 19/20 incl.	Av. monthly use July 2021	% Reduction
John Orwell	15399	5975	61.2
Mile End	78462	75698	3.5
Poplar Baths	26033	19568	24.8
St George's	15482	0	100.0
Tiller	8424	0	100.0
Whitechapel	12589	5768	54.2
York Hall	40738	3430	91.6
TOTAL (all LCs)	197127	110439	44.0
TOTAL (fully open LCs)	132483	107009	19.2

Please note that demand was reduced markedly in the final two months of the 2019/20 financial year due we believe to concerns about Covid-19, so that data has been excluded as it distorts the pre-pandemic average usage statistics. It should also be noted that Tiller and St George's were both fully closed in July 2021, and York Hall's pools were closed (its 'dry' facilities were open). Tiller has now reopened, and York Hall's pool is due to reopen in April 2022.

The table above demonstrates that demand continues to be depressed for all sites, with only Mile End approaching pre-Covid levels of use. Even taking into account the closures set out above, there was a 20% decrease in use pre-pandemic compared to July 2021.

Consultation

The Council has undertaken a consultation exercise to seek the views of residents on its proposals for the future provision of leisure services in the Borough. This included providing data on the existing leisure centres, in particular St George's, and access to the feasibility study undertaken to examine how either St George's or John Orwell sites could be used to provide additional facilities or an entirely new leisure centre.

This consultation began on November 15, 2021. It was originally due to end on 3 January 2022 but was extended, first to 9 January when the project team was advised that the Cabinet meeting its results were being reported to had been pushed back, and

then to 12 January due to the consultation portal being offline on 3/4 January 2022.

The consultation was advertised via the following means to seek to maximise its exposure within the borough:

- Posters in all open leisure centres, including a QR code and web address. Paper copies were provided in leisure centres from 21 December 2021.
- The Better webpages for each leisure centre included a link to the consultation at the head of the landing page for each centre.
- The Council's website included links via the Swimming webpage that provides updates on the provision of pools in the Borough and, of course, the consultation portal.
- The Council's social media accounts.
- Information on the consultation was included in the Council's Bengali language newsletter issued on 17 December 2021.
- All schools were contacted via the Headteachers' Bulletin on multiple occasions during the consultation period.
- Direct emails to sports clubs registered at the Council's leisure centres.
- Direct emails to registered leisure centre users.
- Article featured in December edition of Our East End, P41, which goes to every household in the borough
- Notifications via partners of the Council's, such as:
 - Housing associations, e.g. Poplar HARCA, One Housing
 - Tower Hamlets GP Care Group
 - Members of the Health and Wellbeing Board
 - Our Time SEND Youth Forum
- Publicised via articles submitted to e-newsletters to parents and carers and professionals working with families in Tower Hamlets
- Publicised via youth engagement team networks

In addition, the following events were organised:

- Three face-to-face events at venues around the borough, in Shadwell, Mile End and on the Isle of Dogs. These all complied with the prevailing Covid regulations at the relevant time. Attendance at these was 7, 25 and 1 respectively.
- Two public meetings on 15 November and 9 December 2021. The first was intended to be in person and online but the latter did not happen due to technical difficulties, hence the second online only meeting on 9th December being arranged. 13 people attended on each occasion.
- Member only meetings were held:
 - All Shadwell and St Katharine's & Wapping members were invited to an online briefing on 23 November 2021.
 - All Isle of Dogs members were invited to an online briefing on 6 December 2021.
 - All Council members were invited to a briefing on 6 January 2022.

Responses could be submitted online or in writing. A total of 331 were received. The full report is appended to the Leisure Investment Plan Cabinet report. The major themes are summarised below, with the Council's response at the end of each bullet point:

- Loss of pitches on John Orwell site, temporarily or permanently – a number of the hockey clubs that use the pitch at the John Orwell Sports Centre expressed concern that it might be out of use if that site was selected, citing its importance to their development programmes, and its use by the UK's largest LGBTQIA+ hockey club who would be significantly impacted by even its temporary loss. The Council does not intend to use the John Orwell site for a new leisure centre, so the hockey pitch on that site will not be affected.
- Rebuilding a pool on the John Orwell site would remove an important community asset from Shadwell, and would have a smaller catchment area by definition, given its proximity to the river border of the borough. The proposal to rebuild on the St George's site will maintain provision in Shadwell.
- The implications of the ongoing closure of St George's Leisure Centre were reported to include:
 - Disruption to school swimming, with more teaching time lost due to the need for some schools to travel further than when St George's was open. The Council's response to this is set out above.
 - Overall reduction in swimming capacity in the borough, with specific reference to mothers and babies, disabled people and those preferring female only sessions. Specific mother and baby sessions are provided at Mile End and Poplar as multiple sessions in a new programme called 'Swimbies' – these will be extended to Tiller shortly and York Hall when it has reopened. New SEN swimming lessons are now being provided at Mile End and Poplar and will be introduced at York Hall and Tiller in due course. Female only sessions are available at Poplar Baths and Mile End three times a week at both, and will be introduced at Tiller, now it has reopened. With regard to the permanent facility, the Council will engage with residents and users to ensure the needs of all these groups will be considered in its design and operational specification.
 - Preference of some users for a longer pool than the modern standard. At present the Council intends to build to the 25m standard, as this is compliant with Sport England and Swim England requirements for all relevant sports.
 - Other uses not being able to take place at this venue while it is closed, such as canoeing, life saving practice, diving groups (understood to be scuba not board diving), aqua aerobics, etc. The latter activity is available at the other open pools, and GLL will monitor demand going forwards. The Council will seek to engage with all organisations that have recently used St George's for water-based activities, to understand their requirements for the future design of a pool and/or to explore alternative arrangements should that offer a better option.
- Swimming clubs unable to agree with GLL acceptable access to other pools. The

Council will engage with any swimming clubs that used the facility previously to understand their requirements both in the immediate and longer term.

- Overcrowding elsewhere. At present, usage numbers at other facilities remain below pre-pandemic levels, but the Council will continue to monitor the usage levels closely. The option of a demountable pool has been explored and initially not thought to be required, but this is under ongoing review. The Council will monitor usage figures for the open pools against pre-pandemic levels (when 5 pools were open) to ascertain whether there is a need to provide more capacity due to reaching maximum safe usage at the 3 pools open at present, and York Hall when its pool reopens later this year.
- Some respondents advocated a lido on Shadwell Basin. The Council has considered this as one of the options for restoring swimming capacity in the borough. The Council is supportive of such an initiative being brought forward, but does not intend at present to pursue it as it would not be an appropriate replacement for indoor provision, given the seasonality of such a facility. It would not offer a suitable solution for all users with protected characteristics, in particular.
- Other responses have highlighted design features, at St George's or more generally, that are of particular interest:
- Individual changing cubicles are preferred, and mixed changing rooms should be avoided.
- The need to make any new swimming pools as accessible as possible.

Section 4: Assessing the impacts on different groups and service delivery

Groups	Positive	Negative	Neutral	Considering the above information and evidence, describe the impact this proposal will have on the following groups?
Protected				
Age (All age groups)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The new leisure contract will be structured to improve its flexibility to changing priorities and ensure that service quality can be both measured and improved as a result of applying more up to date key performance indicators (KPIs) than in the current contract. The contractor will also need to ensure that it offers classes that are tailored to the needs of different age groups, including sessions that are open only to a specified age range.
Disability (Physical, learning difficulties, mental health and medical conditions)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The new leisure contract will require the operator to take account of the different needs of users, existing and prospective, in structuring their leisure offer. This will relate both to customer service, in ensuring users receive a consistently appropriate and high standard of service regardless of background and needs, and ensuring that need-specific activities are part of the overall programme offered.
Sex	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The future provision of activities will allow single gender use, e.g. existing women's only gyms will be retained, and the contract will stipulate both that women only programming must be included, but that the operator should provide female staff to oversee such activities.

Gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Staff will be trained to ensure that users attending sites who are undergoing or have undertaken gender reassignment are respected and their specific needs understood and catered for in so far as possible.
Marriage and civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	There is no anticipated impact in respect of residents who are or are not married or in a civil partnership.
Religion or philosophical belief	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The new contract will explicitly reference the need for the contractor to ensure all staff receive appropriate training to enable them to understand and respect specific cultural sensitivities. The operator will also be required to identify how it will manage its publicly available information to ensure that it is accessible in different languages at the point of access.
Race	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The new contract will explicitly reference the need for the contractor to ensure all staff receive appropriate training to enable them to understand and respect specific cultural sensitivities. The operator will also be required to identify how it will manage its publicly available information to ensure that it is accessible in different languages at the point of access.
Sexual orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Engagement will continue with local residents, community groups and religious communities to ensure that any specific design requirements on each relevant site are known and, where appropriate, included in the final build.
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Engagement will continue with medical practitioners, pregnant women, and mothers of young children to ensure that Leisure Service

				facilities fulfil their specific needs, including changing room privacy, (where preferred) areas for private breastfeeding, and safe spaces to oversee children while they participate in activities, e.g. swimming or soft play.
Other				
Socio-economic	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The new contract will seek to provide more jobs for residents within the existing estate. Future planned improvements to the estate will assist further in due course.
Parents/Carers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The future contract will build upon existing initiatives to ensure that there is a programme of holiday activities that children of different ages can participate in, as well as ways to increase the participation of families in health and wellbeing activities, possibly by providing dedicated activity times and/or subsidised access (this cannot be confirmed at this time but will be explored).
People with different Gender Identities e.g. Gender fluid, Non-Binary etc	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The future contract will require the operator to treat all users, prospective and existing, with appropriate respect. Staff should, therefore, be trained to understand how to assist people with different gender identities from accessing leisure facilities and activities in line with legal requirements and existing guidance.
Any other groups	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Section 5: Impact analysis and action plan

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Update on progress
Engagement with existing and prospective service users to ensure proposed investment provides suitable, fit for purpose facilities that will enhance provision.	Ongoing formal engagement programme with users to inform aspects of the new operational specification. Approaches have been made to groups that represent residents and/or existing/ prospective users with protected characteristics, and engagement with those who have responded is ongoing	Commenced in April 2022 The specification for the future leisure service will be further developed through 2022	Michael Coleman	Meetings already held with a range of different representative groups, including those benefiting from social prescriptions, or groups that are currently not using centres (older age group, youth cohort, etc.)
Engagement with existing and prospective service users to ensure the service offer captured in the contract is fit for purpose	Ongoing formal engagement programme with users to inform aspects of the service offer that could be included in the final service specification.	Commenced in April 2022 and will continue through to December 2022 to inform the specification	Michael Coleman/ Lisa Pottinger	Meetings already held with a range of different representative groups, including those benefiting from social prescriptions, or groups that are currently not using centres (older age group, youth cohort, etc.)
Formal consultation if the Leisure Service operating model is any option other than outsourcing	A formal additional consultation process will be needed to consult residents on the proposed to change to an alternative operating model. This is not needed if the existing model is being used.	Anticipated that the consultation would last 4 to 6 weeks, both online and with face to face consultation events	Michael Coleman	N/a

Section 6: Monitoring

What monitoring processes have been put in place to check the delivery of the above action plan and impact on equality groups?



A Leisure Procurement Board has already been established, chaired by the Corporate Director of Children and Culture, and attended by senior officers, including the Corporate Director of Place, Director of Legal, etc.

The action plan above will be made a standing item on the agenda of its monthly meetings, so that progress can be reported on an ongoing basis.

The reported progress at each meeting will consist of a summary of activities against the progress milestones set out above, and the deliverables identified. The Board will assess how effectively the action plan is being adhered to and require mitigation measures to be put in place should there be evidence of slippage and/or deviation from the stated requirements of the plan.

Appendix A

EIA decision rating

Decision	Action	Risk
<p>As a result of performing the EIA, it is evident that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a Protected Characteristic under the Equality Act and appropriate mitigations cannot be put in place to mitigate against negative impact. It is recommended that this proposal be suspended until further work is undertaken.</p>	<p>Suspend – Further Work Required</p>	<p>Red</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negative impact (direct, indirect, unintentional or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, there is a genuine determining reason that could legitimise or justify the use of this policy.</p>	<p>Further (specialist) advice should be taken</p>	<p>Red Amber</p> 
<p>As a result of performing the EIA, it is evident that there is a risk that a disproportionately negatively impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing the actions detailed within the <i>Impact analysis and action plan</i> section of this document.</p>	<p>Proceed pending agreement of mitigating action</p>	<p>Amber</p> 