

# 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 Estate Investment Plan
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
28/01/2022

## 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 monitor swimming capacity at other leisure centres in the period prior to a new pool being opened in the southwest of the borough, and to introduce	

<p>a programme of engagement with residents, current users, clubs, community groups and organisations that represent residents with protected characteristics to develop the proposals for swimming in the southwest of the borough and the estate in general.</p>	
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**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**

<p>Describe the proposal including the relevance of proposal to the general equality duties and protected characteristics under the Equality Act 2010</p>
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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.

These sites offer a range of activities from buildings in variable condition. The Council wants to invest in the leisure estate to improve both the quality and quantity of these facilities. This will make physical activity and sport more accessible through increasing the supply of facilities, and improving the existing buildings, both in terms of their physical condition and their suitability to meet the

needs of residents, including those with protected characteristics under the Equality Act 2010.

The immediate priority of this leisure estate investment plan is to restore swimming provision in the south-west of the borough, which has been reduced due to the closure of St George's Leisure Centre since March 2020, and thus return to having five pools open in the borough.

The recommendation is to invest c. £35m in a new facility on the St George's site that will provide a 6 lane 25m swimming pool, a teaching pool, a 4 court sports hall, 150 fitness gym stations, two studios, and potentially a soft play area, café and creche. This will replace the existing building that is now over 50 years old and includes a 6 lane 33m pool, a teaching pool, 33 fitness gym stations and one studio.

It is proposed that a new building will be provided that will comply with all the requirements of current legislation, including the Equality Act 2010 and Building Regulations. Further to this, the Council intends to engage with residents to ensure the specification for a new leisure centre takes account of the needs of the broadest range of requirements and needs as possible. This is explained further in sections 3 and 5.

The construction of a new facility will take about 5 years from Cabinet approval, during which time the current St George's building will continue to remain closed, pending demolition. This temporary reduction in provision will impact on some users, so that the Council has considered options to address these where possible. These are set out below.

A detailed process was undertaken to assess a range of options for the future provision of leisure services in the south-west of the borough. These included:

- Do nothing – leave St George's closed and not re-provide elsewhere.
- Refurbishing the existing building on the St George's site.
- Constructing a new leisure centre on the St George's site.
- Providing a new leisure centre on the John Orwell Sports Centre site.
- Adding a pool to the existing buildings on the John Orwell site.

Each option has implications for the general equality duties and protected characteristics under the Equality Act 2010.

The option of reopening the existing leisure centre is technically possible, could be completed in 2-3 years, but was not judged to offer good value for money at the estimated costs identified through detailed survey work (c. £9.9m to reopen, an additional £3.5m for up to 5 years extra life and an extra £10m for up to 20 years additional life). This option offers a relatively short extension of its life at

considerable cost, the risk that this additional time may not be deliverable, and no enhancements to provision. Options to extend the building, with an additional building and/or adding to the current structure, are not being taken forward as they would either not be technically deliverable or the space available is not suitable (either due to being too small or the wrong shape). The risks outweigh the reduction in closure time and the quality of facilities thus provided would be suboptimal compared to a new build. The difficulties in adding more capacity on this site with the current building remaining in situ also present a challenge – the available space within the site boundary that could be used is the wrong size and shape to accommodate the facilities (e.g. a 4 court sports hall) that a new build could.

Extending the John Orwell building would involve some disruption to the existing facilities on that site, would provide a quantum of facilities that would not be commensurate with a brand new leisure centre, and would take a similar time to construct compared to an entirely new facility due to phasing issues. It would also take facilities away from Shadwell, to the detriment of residents in that vicinity, a population with a higher proportion with protected characteristics than within the immediate catchment of the John Orwell site.

The same issue would apply should a new leisure centre be built on the John Orwell site to replace the existing facility, even if enhancing provision overall. This would also impact on the use of the John Orwell site during construction, while St George's would remain closed. This would maximise disruption for all service users, whether with protected characteristics or not.

We have a duty under the Equality Act to “Advance equality of opportunity between those with ‘protected characteristics’ and those without them”. The Council has considered the implications of building a new leisure centre for all users, with particular regard to protected characteristics. The new centre will improve the range and quality of facilities for all users, following a period during which the existing leisure centre will remain closed.

As it will take about 5 years to replace the current building with a new leisure centre, there will be a reduced level of provision locally and for the borough as a whole. This mainly affects those individuals, clubs and schools that made use of the St George's Leisure Centre pools prior to its closure. The Council has analysed this impact and how it can, where possible, be mitigated.

The other recommendations of the Cabinet report include undertaking a review of the leisure estate to identify how further improvements could be made. This is an enabling recommendation and does not reach a decision on specific proposals and is not, therefore, considered to have any immediate direct or indirect equalities impact at this stage – any proposals will, of course, be taken forward with direct reference to ensuring their compliance with the Council's duty under the Equality Act.

There are further recommendations to approve funding to undertake this review, and to meet the costs of undertaking design work for a new leisure centre on the St George's site – the latter is directly linked to the proposed rebuilding and, as such, is treated as part of that recommendation.

### 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 <sup>2</sup>	3,345m <sup>2</sup>	(1,413)m <sup>2</sup>	4,398m <sup>2</sup>	(2,466)m <sup>2</sup>	4,462m <sup>2</sup>	(2,530)m <sup>2</sup>
	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
<b>Health and Fitness Gyms</b>	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. The Leisure Estate Investment Plan (including the proposal for a new leisure centre at St George's) will seek to address some of this shortfall, available funding and sites allowing, and ensure existing provision is maintained. In the case of the proposed rebuilding of St George's, this will specifically be achieved by adding a sports hall, increasing gym stations from 33 to 150, and providing an additional studio. It is also proposed that the main pool will be re-provided (as a 6 lane 25m pool, not in its current 33m format), as will the teaching pool. In the longer term, therefore, providing additional facilities will benefit all who choose to use the facilities that will be provided on the St George's site, although it is estimated that this will take at least about 5 years to deliver, and the existing building would not reopen in that time. The implications of this are considered below. A new leisure centre would, in due course, provide enhanced facilities, and allows for engagement with previous and potential users on the design of the successor building. These enhancements, and the engagement to inform their specific form, would involve residents and leisure service users with protected characteristics, as set out in the action plan in Section 5.

### **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
Fitness (Gym)	50,595	101,695	34,304	8,370	23,972	36,697	42,418	<b>298,051</b>
Group Workout	5,341	24,609	4,374	213	1,477	6,006	12,627	<b>54,647</b>
Swimming lessons	n/a	100,688	60,546	75,955	25,256	n/a	70,188	<b>332,634</b>
Swimming activities	4,677	86,586	41,301	52,095	20,512	10,788	83,097	<b>299,056</b>
Sports Hall use (or studio as equivalent)	27,770	34,794	30,256	946	437	23,687	135	<b>118,025</b>
Outdoor activities	7,667	230,184	4,369	102	1,756	35,483	852	<b>280,413</b>
Other activities	56,042	182,353	71,447	13,675	10,150	11,660	197,026	<b>542,353</b>
<b>Total</b>	<b>152,092</b>	<b>760,909</b>	<b>246,597</b>	<b>151,356</b>	<b>83,560</b>	<b>124,322</b>	<b>406,343</b>	<b>1,925,179</b>
<b>% of total</b>	<b>7.9%</b>	<b>39.5%</b>	<b>12.8%</b>	<b>7.9%</b>	<b>4.3%</b>	<b>6.5%</b>	<b>21.1%</b>	<b>100%</b>

All leisure centres were open until 23<sup>rd</sup> 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
<b>TOTAL (all LCs)</b>	<b>197127</b>	<b>110439</b>	<b>44.0</b>
<b>TOTAL (fully open LCs)</b>	<b>132483</b>	<b>107009</b>	<b>19.2</b>

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.

### Impact of closure of St George's

There are two significant implications from the closure of St George's that need to be considered in respect of their equalities impact:

- The absolute loss of the current facility in the long term, once demolished and replaced.
- The temporary loss of capacity (estimated to be for about 5 years) while it remains closed, pending the construction of a new facility.

The absolute loss of the existing facility will allow a net increase in the capacity of the Borough's leisure estate, given that a new building will include more and new facilities. The new building will demonstrate quality improvements in key areas, e.g. changing rooms. It is expected to see a reduction in the length of the pool from a 7-lane 33m main pool to a 6-lane 25m, the latter being considered the standard provision for a wet/dry leisure centre of the size suitable for the St George's site. Ongoing engagement with residents and users will take place to inform the design of any replacement space, should Cabinet approve the recommendation to build a new leisure centre on the St George's site.

With regard to the current closure of St George's, the Council has also considered the most recent usage figures for this site, to inform its analysis of the impact of the leisure centre remaining closed pending construction of a new facility:

Usage Type	Unit	2015/16	2016/17	2017/18	2018/19	2019/20
Total Attendances	Number of users	222,132	229,755	184,343	199,713	170,658
	% of 2015/16 Baseline	100%	103%	83%	90%	77%
Total Swimming Pool Use	Number of users	196,252	216,641	170,968	168,826	121,151
	% of 2015/16 Baseline	100%	110%	87%	86%	62%
Adult Swim Membership	Number of users	205	207	197	184	196
	% of 2015/16 Baseline	100%	101%	96%	90%	96%

It should be noted that the figures for 2019/20 are, as mentioned above, impacted by the reduction in attendances in the final quarter of that financial year, when the Covid-19 pandemic was emerging as a significant public health issue. The downward trajectory in pool use since 2016/17 is believed to be directly linked to the opening of Poplar Baths, which is approximately 20 minutes from St George's by public transport. Poplar Baths is not at 'full' capacity and is therefore able to provide access to swimming beyond its pre-pandemic usage levels.

Statistics for pool use in October to December 2021 for the two open pools, Mile End and Poplar, are shown below, compared to the same period in 2019:

Mile End	October	November	December
2019	5855	4831	3364
2021	6508	5196	3492

Poplar Baths	October	November	December
2019	2978	2830	1993
2021	3739	2985	1864

The combined usage at both centres was 5% greater in this three month period in 2021 than the same period in 2019, 24130 visits versus 22984 respectively, a total increase of 1146. It is not known whether these users were previously using St George's, Tiller or York Hall, or were new users, nor whether the pandemic affected potential numbers. It is difficult to identify a direct causal link with any variable that might affect swimming use in the period since the pandemic began, outside of the obvious fact that fewer pools were open.

The Council has also considered the impact of this upon schools in the vicinity that would previously have used the pools at St George's. The table below shows recent annual usage by local schools:

Academic Year	Total Hours per Week	Number of Schools
2014-2015	39	26
2015-2016	38	24
2016-2017	33	24
2017-2018	33	23

2018-2019	32	21
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Of the 21 schools that had used St George's in the 2018/19 year, 7 had not made alternative arrangements for swimming as of November 2021. Primary schools are required to teach swimming as part of the Key Stage 2 curriculum. The Council has, therefore, put in place a number of measures to mitigate the temporary loss of swimming at St George's for school pupils:

- It has provided transport to take pupils from these seven schools to other pools in the Borough, free of charge, from January 2022 onwards.
- GLL is providing intense swimming courses at half terms, and for year 6 pupils in the final month of the summer term. Intensive swimming "catch up" courses for year 7 and year 8 pupils are also planned.
- An option to provide a demountable pool has been considered. This remains a possibility, assuming that a site could be made available and sufficient funding (capital for construction and revenue for running costs) allocated – neither has been confirmed to date. If this option is pursued as an interim measure prior to a new permanent facility opening, it would still take up to 2 years to gain planning for, procure and construct a sufficiently robust demountable pool to last for a further 3 years.

### Consultation

The Council has undertaken a consultation exercise to seek the views of residents on the proposed leisure estate investment plan. 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 results were being reported to had been pushed back, and then to 12 January following an outage on the consultation portal 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 9<sup>th</sup> 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?
<b>Protected</b>				
<b>Age</b> (All age groups)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Providing a new leisure centre will ultimately benefit all ages due to the improvement in the quality and range of facilities. It will take c. 5 years from a decision before a new leisure centre could be open, during which time the current leisure centre would remain closed. Some mitigations for this are set out in section 3 above. The Council's analysis of the condition needs of St George's concludes that significant investment is needed before it could reopen, so there would be at least a 2 year hiatus <i>if</i> the building was to be reopened. This would not, however, provide an improvement to the range of activities.
<b>Disability</b> (Physical, learning difficulties, mental health and medical conditions)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The current facilities at St George's have received some investment to improve accessibility, including the installation of a lift. The building was designed in the 1960s and does not, therefore, incorporate design requirements that would enable it to meet the full requirements of the Equalities Act. For example, the viewing area on the middle balcony of the existing pool has a narrow access which makes wheelchair access

				<p>difficult. The studio's public access is off the car park, not through the building. A new facility would be built to meet the needs of all service users, with full accessibility throughout the building, and designed in features to assist participation. The project team will engage with users to understand scheme specific requirements, as well as bringing experience of other projects to bear, to maximise the building's functionality for all users. A fully compliant changing places toilet will be included that can be accessed by the community not only building users.</p>
<b>Sex</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>A new building will be designed to ensure that facilities meet gender-specific needs. This will include changing facilities that offer appropriate privacy and security to all users. Similarly, the activities and facilities mix will be sufficient to allow single gender use where engagement with service users and residents indicate a demand for the same.</p>
<b>Gender reassignment</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The current building includes no design features that encourage service users who are undertaking, or who have undertaken, gender reassignment to make use of the facilities. A new leisure centre will, for example, include more private changing room facilities, and the proposed engagement programme the Council proposes will seek to include the views of residents who have or intend to undergo gender reassignment.</p>
<b>Marriage and civil partnership</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>There is no anticipated impact in respect of residents who are or are not married or in a civil partnership.</p>

<b>Religion or philosophical belief</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Engagement will be undertaken with local residents, community groups and religious communities to ensure that any specific design requirements are known and, where appropriate, included in the final build.
<b>Race</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Engagement will be undertaken with local residents, community groups and religious communities to ensure that any specific design requirements are known and, where appropriate, included in the final build.
<b>Sexual orientation</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Engagement will be undertaken with local residents, community groups and religious communities to ensure that any specific design requirements are known and, where appropriate, included in the final build.
<b>Pregnancy and maternity</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Engagement will be undertaken with medical practitioners, pregnant women, and mothers of young children to ensure that these 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.
<b>Other</b>				
<b>Socio-economic</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The new facility will provide more jobs and encourage access to the immediate area, once open.
<b>Parents/Carers</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	In the short term, parents and carers will need to travel further to access swimming facilities. A new leisure centre will, however, have improved

				facilities for parents and carers to make use of, either alongside those they care for, or opportunities to oversee activities that the latter participate in.
People with different <b>Gender Identities</b> e.g. Gender fluid, Non-Binary etc	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The current building includes no design features that encourage service users with different gender identities to make use of the facilities. A new leisure centre will, for example, include more private changing room facilities, and the proposed engagement programme the Council proposes will seek to include the views of residents with different gender identities to understand what specific design requirements they would like to be considered for the new leisure centre.
<b>Any other groups</b>	<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 a new leisure centre provides suitable, fit for purpose facilities that will enhance provision.	Formal engagement programme with users, both online and (Covid restrictions allowing) face to face to inform aspects of the new leisure centre design and operational specification. Approaches to be made to groups that represent residents and/or existing/prospective users with protected characteristics	April 2022 to commence, with engagement through to end of RIBA 3 in January 2023 for St George's. Similar engagement to be held on proposals for other leisure centres, once confirmed.	Michael Coleman	
Support schools to access swimming at other sites during the period St George's is closed	Free bus travel being provided to 7 schools that have not made other arrangements during the period of closure.	To be reviewed on a regular basis.	Judith St John	
GLL to provide 'intense' swimming lessons for KS2 primary school pupils during half terms at other pools in the borough	Training to be advertised to schools that previously used St George's	Offer to be advertised to schools prior to half terms in spring and summer. Review of take-up levels post-each week	Lisa Pottinger	
GLL to provide 'intense' swimming lessons for Yr6 pupils in final weeks of summer term	Training to be advertised to schools that previously used St George's	Offer to be advertised to schools prior to half term in summer. Review of take-up levels post-period	Lisa Pottinger	
GLL to provide 'intense' swimming lessons for Yr7 and Yr8 pupils who missed KS2 swimming due to closure of pools	Training to be advertised to schools for Yr7 and Yr8 pupils	Offer to be advertised to schools prior to half term in summer. Review of take-up levels post-period	Lisa Pottinger	

Ongoing monitoring of swimming visits at the pools that are open, to ascertain whether these are approaching capacity	Regular monitoring of pool usage, compared against previous levels pre-pandemic. This includes general and specific use (e.g. mother and babies lessons, SEN swimming lessons, female only use, aqua aerobics, etc.)	Ongoing monitoring to assess the pressure on pool provision and inform whether additional demountable capacity is required	Lisa Pottinger	
Demountable pool option to be reviewed	Further review of demountable pool locations and design options to confirm whether feasible, alongside ongoing review of demand	Review to be completed by end of April 2022	Michael Coleman	

## 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 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. GLL will provide data on monthly usage of their open facilities, in particular swimming activities, to measure whether facilities are approaching peak capacity.

The report 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.

A further report is due to be considered by Cabinet in July 2022, setting out the investment strategy for the rest of the leisure estate, which will include an update on the achievement of the action plan set out above.

# 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><b>Suspend – Further Work Required</b></p>	<p><b>Red</b></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><b>Further (specialist) advice should be taken</b></p>	<p><b>Red Amber</b></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><b>Proceed pending agreement of mitigating action</b></p>	<p><b>Amber</b></p> 