

## Appendix E

### Equality Impact Assessment (EIA)

Name of Policy or Practice	Introduction of an annual fee to the Disability Ffitcard		
Head of Service responsible for the Policy or Practice	Marianne Jackson Head of Community Development Services		
Name of officer (s) completing impact assessment form	Shaun Thompson		
Service	Community Development Services - Active and Creative Lifestyles	Date of Assessment	04/07/2013

EIA Completed by :		EIA Agreed by Head of Service :	
Date	01/11/2013	Date	01.11.2013
Name(s)	Shaun Thompson	Name	J Hardy
Signature(s)		Signature	

### STEP 1 – Identify the Main Aims and Objectives of the Policy or Practice

1. What is being assessed? (**Please double click on the box and select 'checked' as appropriate to cross X**)

- New and revised policies or practices
- New procedures (which modify service delivery or employment practices)
- Service review or re-organisation proposals which affect the community and/or staff
- Efficiency or saving proposals
- Setting budget allocations for new financial year
- Decisions affecting service users, employees or the wider community
- New project proposals affecting staff, communities or accessibility to the built environment, eg, new construction work or adaptations to existing buildings
- Other please explain in the box below :

The results of the screening indicated the need to complete a full EIA concentrating on Disability and Age.

2. What are the overall aims and objectives of the policy or practice ?

Introduce an annual subscription/administration fee to the Disability Ffitcard. It is recommended that this be introduced when the Disability card is next renewed.

3. Who is the policy or practice intended to help or benefit (stakeholders) ?

Conwy community, as a whole and partners through the development of a policy pricing framework for activities within leisure centres and swimming pools.

4. Who are the main consultative groups or communities of interest ?

The Disability Sports Officer, Leisure Centre Managers and Sports development Officers. Conwy is particularly keen to seek the views of the community to help encourage and facilitate the use by all groups, of the authorities facilities.

## **STEP 2 - Consider Existing Information and What This Tells You**

When completing this section, you need to consider if you have sufficient information with which to complete your EIA, or whether you need to undertake a period of engagement/consultation before continuing. The legislation relating to the EIA process requires you to **engage and involve people who represent the interests of those who share one or more of the protected characteristics and with those who have an interest in the way you carry out your functions**. This needs to be proportionate to the policy or practice being Equality Impact Assessed. You may have already recently undertaken consultation specifically on this policy or practice. Other officers within CCBC may have carried out engagement work which will be relevant to this EIA and you can review the Community Involvement Database to find out what engagement activities have taken place in Conwy and establish if this is relevant. If you have very little or no information from previous engagement that is relevant to this EIA, you should consider undertaking some engagement work with your stakeholders and with relevant representative groups to ensure that you do not unwittingly overlook the needs of each protected group.

5. What do you already know about the impact on each protected characteristic from your experience of current service delivery or previous engagement or consultation? You could refer to the Initial Equality Impact Assessment Screening Form and the Community Involvement Database.

<b>Protected Group</b>	<b>Relevance of the policy / practice by protected characteristic</b>
Race	Of a population of 79,701 within a 10 mile radius, the 2001 Census details that 78,718 are white, 355 are of mixed race, 281 are Asian or Asian British, 88 are black or Black British, 259 are Chinese or other Ethnic Groups. Currently no issues have been identified.
Disability	Of a population of 109,596 within Conwy County, the 2001 Census details that there are 25,743 people within a limiting long-term illness, of which 10,535 are working age. The leisure centres currently have 667 Disability Ffitcard holders.
Sex	Of the population of 79,639 within a 10 mile radius, the 2001 Census details that there are 37,835 males and 41,804 females. Of the 667 Disability Ffitcard holders there are 318 female and 338 male and 11 information unknown.

Age	Of a population of 109,590 within Conwy County, the 2001 Census details that there are 24,910 aged 0-19, 59,375 aged 20 - 64, and 25,305 aged 65 and over. There are 667 Disability Ffithcard holders age ranges from 161 aged 0 - 19, 460 aged 20 - 64, and 46 aged 65 and over.
Religion & Belief	Of a population of 79,683 within a 10 mile radius, the predominant religion is Christian (61,372), followed by No Religion (11,738), Religion not Stated (5,779), Muslim (247), Other Religion (206), Buddhist (159), Hindu (86), Jewish (78) and Sikh (18). Currently no issues have been identified.
Sexual Orientation	No data is currently available
Gender Reassignment	No data is currently available
Marriage & Civil Partnership	No data is currently available
Pregnancy & Maternity	No data is currently available
Welsh Language	Of a population of 106,316 within Conwy County, the 2001 Census details that there are 31,042 people in total who are Welsh speakers. Signage will be bi-lingual to comply with Conwy's policies. Staff will be available to respond in Welsh language. Instruction can be made available in the Welsh language.
Other (please state)	N/A

6. Summarise the additional relevant data, research and performance management information you already have:

<b>Data / Information</b>	<b>Examples</b>
<p>Conwy has 667 disability Ffitcard Holders.            Of the 667 there are 318 Female and 338 Male and 11 information unknown.            There are: 161 aged 0 - 19, 460 aged 20 - 64, and 46 aged 65 and over.</p> <p>Service User Data – Collected from Active and Creative Lifestyles Management Information System (MIS)</p> <p>Total attendance: 887,551            Total Ffit card members: 12,928            Total Disability Ffit card members: 667            Total number of free swims per week of school holidays: 6,291            Total number of casual swimming attendances excluding Junior free swim: 127,853</p> <p>Breakdown of Ffit card holders:            Adult: 40%            Junior: 38%            Senior Citizen: 14.5%</p>	<p>Initial EIA Screening            Complaints            Compliments            Service User data            Service User Feedback            Inspections or Audits</p>

Student: 1.5%

Disabled: 6%

Gender Breakdown:

Male: 44%

Female: 56%

Nationality:

British: 43%

Welsh: 39%

English: 12%

Scottish: 1%

Irish: 1%

Other: 4%

Ethnicity of members:

White: 95.1%

Asian Indian: 0.8%

Asian Bangladeshi: 0.2%

Black African: 0.4%

Asian Pakistani: 0.2%

Black Caribbean: 0.0%

Asian other: 1.7%

Black other: 0.0%

Chinese: 0.4%

Mixed white and black Asian: 0.3%

Chinese other: 0.1%

Mixed white and Asian: 0.2%

Gypsy traveller: 0.1%

Mixed other: 0.1%

Other: 0.1%

Consulation found that this user group would be happy to pay an adminstration fee although would not be happy to follow neighbouring authorities by charging a monthly rate.

<p>The group stated how important it was that the proposed changes were advertised well in advance and highlighted an issue where previously a Disability Ffit Card holder was incorrectly refused free admission which resulted in the Ffit Card holder stating they would contact the Equality and Human Rights Commission regarding a case for discrimination before the issue was resolved.</p> <p>The group also highlighted the benefits of the Disability Ffit Card and how use of the facilities can increase the functional ability, increase confidence and assist in disabled members learning life skills, such as learning to swim.</p>	
<p><b>Research or Comparative Information</b></p>	<p><b>Examples</b></p>
<p>Other authorities charge a monthly rate which is then discounted this amount varies between authorities please see examples:</p> <p>List of 22 authorities below of those two including Conwy do not charge.</p> <ul style="list-style-type: none"> <li>• Blaenau Gwent</li> <li>• Bridgend</li> <li>• Caerphilly</li> <li>• Cardiff</li> <li>• Carmarthenshire</li> <li>• Ceredigion</li> <li>• Conwy</li> <li>• Denbighshire</li> <li>• Flintshire</li> <li>• Gwynedd</li> <li>• Isle of Anglesey</li> <li>• Merthyr Tydfil</li> <li>• Monmouthshire</li> <li>• Neath Port Talbot</li> <li>• Newport</li> <li>• Pembrokeshire</li> <li>• Powys</li> <li>• Rhondda Cynon Taf</li> </ul>	<p>Service User Surveys  Studies by Government departments or professional bodies  Census data  Service based projects and research  How Fair Is Wales (EHRC data)</p>

- Swansea
- Torfaen
- Vale of Glamorgan
- Wrexham

Having contacted Disability Sports Officers from the following Local Authorities regarding their access schemes.

Denbighshire County Council: membership's prices range from £20.50 to £29.50 per month. These are payable on a month by month basis therefore no commitment is required. Currently offering a "gym and swim" membership which provides disabled customers with a saving of £3.00 per month on usage of the fitness suites and swimming pools across the County.

Cardiff : have a card which gives discounts for people on particular benefits which includes people on disability benefit. No free access cards though and nothing specifically for disabled people.

Neath Portalbot: A 1+1 scheme. Our leisure providers are not LA, they are within a Trust.

Flintshire: An 'activ plus 1' membership- disabled person pays full price however carer/support can access free of charge- taking into consideration support ratios. i.e. if someone requires 2 to 1 or even 3 to 1 ratio in some instances then all are free. They are in the middle of doing some work with this at the moment as numbers seem to be low as people are misinterpreting the eligibility criteria (DLA, attendance allowance and/or disability working tax credits) - they think we want to know how much they receive- rather than that they are in receipt of appropriate benefits.

Wrexham: Runs what they call the DASH scheme (Disability Access to Sport and Health). A concessionary DASH fitness membership is offered at £13.75 a month Direct Debit or £120.00 Annual Fee (Both equate to 50% off the standard membership fee). Pay as you go sessions are also offered at 50% off, this includes hire of facilities such as squash courts, 5-a-side, Basketball, etc. In order to qualify for DASH the client must be in receipt of Disability Living Allowance and must provide proof of this. Running alongside this is an offer for Carers, if someone is a carer and receives Attendance Allowance or some kind of carers allowance they can visit AVOW (Association of Voluntary Organisations in Wrexham) within Wrexham and receive a carers card which will then entitle them to receive a DASH fitness membership to utilise for themselves as they wish in order to give them some respite from caring. The DASH membership is the same as a full membership in that there are no restrictions upon use and users can use fitness suites, classes, swimming and health suites at all



5 Wrexham Leisure sites. For the pay as you go option the client just pays an annual renewal fee of £5.00 to activate their card.

Monmouthshire: They run a passport to leisure scheme based on what income support such dla, job seekers etc and they get a discount of 25% or 50% depending on the individuals circumstances.

Newport: There is concessionary leisure card scheme operating in Newport that gives a discount on selected activities to disabled people.

Vale of Glamorgan: Do not have a specific disability card but if a disabled person joins the local fitness membership they will get a concession price. It varies what discount they get with each activity.

Powys: We have a similar scheme to Conwy, free swim and gymnasium for disabled person, plus a carer, once they have paid the gym membership, also we have a scheme for free access to facilities for talented athletes.

Merthyr: A passport to leisure this is open to disabled people and allows half price use of leisure facilities. At present though this only applies between the hours of 7am and 4pm and does not include any specific classes, just the use of the facilities e.g. pool, gym etc.

Rhondda Cynnon Taff: Disabled users are entitled to a discounted morecard which give a level 2 discount access to all facilities. A level 2 user has the same rates as juniors and oap's for all products

Denbighshire County Council - membership's prices range from £20.50 to £29.50 per month. These are payable on a month by month basis therefore no commitment is required. Currently offering a "gym and swim" membership which provides disabled customers with a saving of £3.00 per month on usage of the fitness suites and swimming pools across the County.

Gwynedd - Offer a full direct debit package which includes unlimited use of pool, fitness room, fitness classes for £28.00 or discounted for disabled users at £18.00.

The Equalities Act 2010 and update published in March 2011 places a specific duty on public sector bodies in relation to equality. Conwy County Borough Council has a duty to:

a. remove or minimise disadvantages suffered by people due to their protected characteristics.

b. take steps to meet the needs of people from protected groups where these are different from the needs of

<p>other people.</p> <p>c. encourage people from protected groups to participate in public life or in other activities where their participation is disproportionately low.</p> <p>In addition Conwy County Borough Council must publish sufficient information to demonstrate its compliance with the general equality duty across each of its functions.</p> <p>The new duty covers eight protected characteristics: age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.</p>	
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7. Have you complied with the duty to Engage as described at the start of this section and are you sufficiently informed to proceed?

Yes  No  **(please cross as appropriate X)** If Yes, please proceed to Step 3

If No, you may wish to consider pausing at this point while you undertake engagement activities (which you should add to your action plan – Step 6). Please incorporate any information you have obtained from this additional activity in the box below and state what the key findings were :

Conwy's Disability Ffit Card and the scheme to give disabled people free access to leisure facilities has a significant impact on the physical activity levels of disabled people in Conwy. If this was withdrawn or if there was a monthly charge put in place then it would have a negative affect on the amount of disabled people in Conwy taking part in regular physical activity and exercise.

The Disability Ffit Card is a good example of where Conwy are proactive in tackling the barriers that disabled people face and provides the necessary incentive for an individual to want to visit a leisure facility and take part in sport or physical activity. Some of the barriers disabled people face include; attitudes and perceptions of others and those within public settings. Therefore it can be the case that disabled people will stay within their comfort zone at home unless there is an incentive for them to take in activities. The disability Ffitcard holder's age range 2 – 85 with a large majority of 460 being between the ages of 20 – 65. The group expressed if Conwy adopted a

similar route to other authorities charging a monthly rate it was felt user numbers would decrease.

### **STEP 3 - Procurement and Partnerships**

The public sector General Duty means all public authorities need to consider the needs of different groups when designing and delivering public services. This duty also applies to private sector organisations who deliver a public function on our behalf and we need to ensure that those organisations exercise those functions by ensuring our procurement and monitoring of those services complies with the General Duty.

8. Is this policy or practice to be carried out wholly or partly by contractors or in partnership with another organisation(s)?

Yes  No  ***(please cross as appropriate X)*** If No, please proceed to Step 4

9. If yes, how will you comply with Equality, Human Rights and Welsh Language Legislation? Think about :

#### **Procurement**

- Setting out clear equality expectations in Tendering and Specification documentation
- On what you based your decisions in the award process
- That contract clauses cover legislative equality requirements
- Performance and Monitoring measures are included to monitor compliance

#### **Partnerships**

Who is responsible for :

- Equality Monitoring relevant data
- Equality Impact Assessment
- Delivering the actions from the EIA
- Ensuring that equality, human rights and Welsh Language legislation is complied with by all partners

#### **STEP 4 - Assessing the Impact**

10. Is there any evidence of higher or lower take-up or satisfaction by any group(s), and if so, how is this explained?

To be monitored when introduced. This strategy is for those with a Disability Ffitcard.

11. Does the geography or demography of any groups reveal anything?

Conwy has 11 Leisure sites centres.  
667 Disability Ffitcard holders age ranges from 2 - 85.  
There are 161 aged 0 - 19, 460 aged 20 - 64, and 46 aged 65 and over.

12. Do any rules or requirements or the way the policy or practice is delivered prevent or reduce the likelihood of any groups from use or access or are any other barriers created for them?

Eg: due to limited income, location, times of availability, access to buildings, information or language, eligibility rules, dress code, cultural issues

This income is reoccurring annually however the consultations believed this to be the best way to implement this administration fee, based on other authorities implementing schemes and monthly charges where as Conwy will continue to provide free use of facilities to this user group once the card has been purchase.

13. Can any of these limitations be justified on the grounds of advancing equality of opportunity or fostering good relations between those who share a protected characteristic and those who do not?

Feedback from consultation indicated an understanding behind the administration charge. The group were also informed the £6.50 fee is charged at a further reduced concessional cost to the standard Ffitcard rate of £9.50. the group were also aware that neighbouring authorities offered monthly charges for use with discounts which varied between authorities Conwy will continue to offer the use of facilities free of charge to this user group.

14. Do any of these limitations amount to unlawful discrimination?

Yes  No  Not Sure   
**(please cross as appropriate X)**

If you answered Yes or Not Sure, please state on the table below, which protected group(s) it applies to and if possible explain why (including likely impact or effects of this proposed change):

Race	Black Minority Ethnic groups Gypsies / Travellers Language
Disability	Mobility Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities
Sex	Men Women
Age	Older People Children Young People
Religion & Belief	Faith communities
Sexual Orientation	Gay Lesbian Bi-sexual Heterosexual
Gender Reassignment	A person who proposes to, starts or has changed his or her gender
Marriage & Civil Partnership	
Pregnancy & Maternity	

Human Rights	Right to Education, Private and Family Life, Protection of property, etc
Welsh Speaking Communities	
Other socially excluded groups or communities (please state)	

15. If you answered No to Question 14, do the barriers and limitations amount to a differential impact for certain groups?

Yes  No  Not Sure   
**(please cross as appropriate X)**

16. If you answered Yes or Not Sure to Question 15, please give details in the box below and explain why

Yes it is an impact however in order to mitigate this fee of £6.50 it is a one off fee which is paid on an annual basis and thereafter leisure facilities will remain free of charge.

17. Do you have enough information to make an informed judgement?

Yes  No  **(please cross as appropriate X)**

If you answered Yes, please justify:

Consultation undertaken and maintain free access to classes and activities .

If you answered No, what information do you require about protected groups?

18. Is it possible to get the information needed quickly and easily, or should data collection be included in the action plan? Please give details below:

The figures have been taken from our MIS system

## **STEP 5 – Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice**

In this section, you will consider whether there are any measures to reduce or remove any adverse impact. You should also explore other ways of achieving the same goal and / or alternative means of delivering a service to meet the needs of different groups.

19. What measures can you introduce to the policy or practice which could reduce or remove any unlawful impact or disadvantage?

This is a reduced fee of £6.50 thereafter usage of facilities will remain free of charge.  
All Leisure centre sites will advertise these changes clearly with posters well in advance of the introduction to give the public as much notice as possible. During this period public reaction will be monitored considering any feedback from this user group.

20. What measures could be included to strengthen the policy/practice and foster good relations and advance equality of opportunity?

It is proposed to be introduced throughout all Conwy Leisure site with a 3 month high profile advertising campaign once a launch date has been confirmed

21. What actions could you take to achieve the same goal by an alternative means?

We could explore introducing a similar charging process to neighbouring authorities which tend to offer a monthly fitness membership with a small reduction to their standard monthly rate.



## **STEP 6 – Action Plan**

Please outline below the actions you will take to progress your proposal. These might involve carrying out additional Engagement/Involvement activities, collecting Equality data where this was not readily available to help with this EIA, undertake data analysis from future data obtained to monitor the impact of this policy/practice on an ongoing basis, any actions you need to take to ensure procurement complies with the General Duty, any arrangements you need to put in place to monitor and review the impact of this policy/practice in future, and so on.

<b>Action</b>	<b>Measure of Success</b>	<b>Timeframe</b>	<b>Lead Responsibility</b>	<b>Add to Service Plan (✓)</b>
<b>Actions to be taken before EIA and policy/practice can be signed off</b>				
Date of introduction to be agreed	Date agreed once signed off	1 months	John Hardy	
Once launch date has been agreed a 3 month advertising campaign to ensure feedback can be monitored in the lead up to its introduction	To be measured by Feedback received within this period	3 months	John Hardy	
<b>Actions after EIA and policy/practice signed off</b>				
To further engage with the people that could be affected by this proposals.	To be measured by Feedback received within this period	Annually	John Hardy	
To consult with the Corporate Equalities and Legal teams to ensure that all reference to equality legislation is adhered to if any procurement and	Partners and suppliers have agreement in	When the need arises	John Hardy	

partnerships are undertaken	place to include commitment to equalities.			

**STEP 7 – Decision To Proceed**

22. Using the information you have gathered in steps 1 – 5 above, please state on the table below whether you are able to proceed with the policy or practice and if so, on what basis?

*(please cross as appropriate X)*

Decision		Action
<input type="checkbox"/> Yes	Continue with policy or practice in its current form	Complete the Monitoring and Review section (Step 8) to ensure the outcomes are monitored and regularly reviewed
<input checked="" type="checkbox"/> Yes	Continue with policy or practice but with amendments for improvement	Complete Action Plan and Monitor and Review sections (Steps 6 & 8) to continually assess impact
<input type="checkbox"/> Yes	Continue with policy or practice but with amendments to remove any areas of adverse impact as identified in Step 5	Complete Action Plan (Step 6) to address any areas of adverse impact and Monitor and Review (Section 8) to continually assess impact
<input type="checkbox"/> No	Abandon this policy or practice as it is not possible to	Complete Action Plan to address any issues resulting

	address the adverse impact, and consider alternative ways of addressing the issues	from abandoning policy and to deal with the adverse impact identified
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**STEP 8 – Arrangements for Monitoring Outcomes and Reviewing Data**

The EIA process is an ongoing one that doesn't end when the policy/practice and EIA is agreed and implemented. There is a specific legal duty to monitor the impact of policies/practices on equality on an ongoing basis to identify if the outcomes have changed since you introduced this new policy or practice.

23. Please outline below what arrangements you will make to monitor and review the ongoing impact of this policy or practice :

<b>Monitoring and Review arrangements</b> (including where outcomes will be recorded)	<b>Timeframe &amp; Frequency</b>	<b>Lead Responsibility</b>	<b>Add to Service Plan (✓)</b>
Proposal linked into the business plan	Quartely	John Hardy	
Focus Groups and MIS to monitor feedback and usage increase or decrease	Quartely	John Hardy	
Ensure sales are monitored through the MIS system to record data for comparison..	Quartely	John Hardy	

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**STEP 9 – Publishing the Equality Impact Assessment**

**Please arrange for this completed EIA to be agreed by your Head of Service, refer to the EIA Policy regarding publishing arrangements and return a copy to the HR and Equality Officer.**