

EQUALITY IMPACT ASSESSMENT FORM

November 2018

THE COUNCIL'S EQUALITIES STATEMENT

This Council recognises that people have different needs, requirements and goals and we will work actively against all forms of discrimination by promoting good relations and mutual respect within and between our communities, residents, elected members, job applicants and workforce.

We will also work to create equal access for everyone to our services, irrespective of ethnic origin, sex, age, marital status, sexual orientation, disability, gender reassignment, religious beliefs or non-belief, use of Welsh language, BSL or other languages, nationality, responsibility for any dependents or any other reason which cannot be shown to be justified.

The Council is required to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct that is prohibited by the Equality Act 2010
- advance equality of opportunity between people who share a relevant protected characteristic and those who do not
- foster good relations between people who share a protected characteristic and those who do not.

The Act explains that having due regard for advancing equality involves:

- removing or minimising disadvantages experienced by people due to their protected characteristics
- taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

The protected characteristics are:

- | | |
|----------------------------------|----------------------------------|
| • Age | • Race |
| • Disability | • Religion, Belief or Non-Belief |
| • Gender Re-assignment | • Sex |
| • Marriage and Civil Partnership | • Sexual Orientation |
| • Pregnancy and Maternity | • Welsh Language* |

* The Welsh language is not identified as a protected characteristic under the Equality Act 2010, however in Wales we also have to treat Welsh and English on an equal basis as well as promoting and facilitating the use of the Welsh language.

Further advice on completing impact assessments can be found on the equalities pages of Corporate Policy Unit Portal.

THE EQUALITY IMPACT ASSESSMENT

| | |
|---|--|
| NAME OF NEW OR REVISED PROPOSAL* | Changes in VAT Application for Leisure Pricing |
| DIRECTORATE | Communities |
| SERVICE AREA | Communities & Leisure |
| CONTACT OFFICER | Jeff Reynolds |
| DATE FOR NEXT REVIEW OR REVISION | |

***Throughout this Equalities Impact Assessment Form, ‘proposal’ is used to refer to what is being assessed, and therefore includes policies, strategies, functions, procedures, practices, initiatives, projects and savings proposals.**

The aim of an Equality Impact Assessment (EIA) is to ensure that Equalities and Welsh Language issues have been proactively considered throughout the decision making processes governing work undertaken by every service area in the Council as well as work done at a corporate level.

The Council’s work across Equalities, Welsh Language and Human Rights is covered in more detail through the [Equalities and Welsh Language Objectives and Action Plan 2016-2020](#).

When carrying out an EIA you should consider both the positive and negative consequences of your proposals. If a project is designed for a specific group e.g. disabled people, you also need to think about what potential effects it could have on other areas e.g. young people with a disability, BME people with a disability.

There are a number of supporting guidance documents available on the [Corporate Policy Unit Portal](#) and the Council’s Equalities and Welsh Language team can provide advice as the EIA is being developed. Please note that the team does not write EIAs on behalf of service areas, the support offered is in the form of advice, suggestions and in effect, quality control.

Contact equalities@caerphilly.gov.uk for assistance

PURPOSE OF THE PROPOSAL

| | |
|----------|---|
| 1 | What is the proposal intended to achieve? A recent change in relation to the application of VAT to leisure pricing has resulted in additional income to the Council. |
| 2 | Who are the service users affected by the proposal? A small number of Clubs reclaim VAT paid on charges and will not be able to do so now that the VAT change has been applied. Furthermore, a small number of Clubs currently have a VAT exemption through block bookings and these charges have increased to ensure consistency for all customers. Delegated authority has been given to the Interim Director of Communities, in consultation with the relevant Cabinet Member, to deal with any issues arising with these Clubs. |

IMPACT ON THE PUBLIC AND STAFF

| | |
|----------|--|
| 3 | Does the proposal ensure that everyone has an equal access to all the services available or proposed, or benefits equally from the proposed changes, or does not lose out in greater or more severe ways due to the proposals? Leisure Centre provision is not a statutory requirement of Local Government in Wales. The Council subsidises Leisure Centre provision in Caerphilly. This subsidy is not necessarily strategically directed nor applied consistently which results in operational anomalies. At present there are 11 facilities within the portfolio supported by CCBC. Reducing revenue and capital resources need to be balanced against crucial health and well-being priorities and focus on making the most impact possible on health and well-being inequalities, which will facilitate continued provision of a range of opportunities to benefit our residents. Sport & Leisure Services currently support a proactive approach to concessionary pricing with older users receiving a 30% reduction on 'pay & play' activities, with a 25% reduction on monthly membership fees. This is further supported through the provision of free swimming for all customers aged 65+ outside of school holiday periods and every Friday as part of a specific promotion aimed at encouraging participation. Until recently certain affiliated clubs and organisations were able to take advantage of a 20% price reduction through utilising a block booking process or series of 10 lets. This proposal removes that advantage and treats all bookings as equal from a pricing perspective. Actions required: <ol style="list-style-type: none">1. A proactive review of existing customer information to ensure that all customers who are eligible to access concessionary prices are receiving the appropriate concession2. Work and communicate proactively to all clubs and organisations that support engagement with physical activity to maximise access to grant funding |
|----------|--|

| | | |
|----------|---|------------------------------------|
| | 3. Explore options for complimentary booking practices between clubs and organisations aimed at exploring managed cost reductions | |
| 4 | Is your proposal going to affect any people or groups of people with protected characteristics? | |
| | Protected Characteristic | Positive, Negative, Neutral |
| | Age | Neutral |
| | Disability | Neutral |
| | Gender Reassignment | Neutral |
| | Marriage & Civil Partnership | Neutral |
| | Pregnancy and Maternity | Neutral |
| | Race | Neutral |
| | Religion & Belief | Neutral |
| | Sex | Neutral |
| | Sexual Orientation | Neutral |
| | Relevance of the Policy or Practice The change in the application to VAT pricing affects members of the general public equally irrespective of any protected characteristics. | |

| | |
|----------|--|
| 5 | <p>In line with the requirements of the Welsh Language Standards. (No.1) Regulations 2015, please note below what effects, if any (whether positive or adverse), the proposal would have on opportunities for persons to use the Welsh language, and treating the Welsh language no less favourably than the English language.</p> <p>The changes in the application of VAT in respect of Leisure Centre pricing structures will not have any effects on opportunities for persons to use the Welsh language, and treating the Welsh language no less favourably than the English language.</p> |
|----------|--|

INFORMATION COLLECTION

| | |
|----------|---|
| 6 | <p>Please outline any evidence and / or research you have collected which supports the proposal? This can include an analysis of service users.</p> <p>In 2016 26.9% of people in the county borough aged 16-64 were disabled as defined by the Equalities Act. In the 2011 Census 97.6% of the population are identified as English/Welsh/Scottish/Northern Irish/British. 50.7 are identified as being of Christian religion with 48.32% identified as having no religion or religion not stated. 50.95% of the population of the county borough were female and 49.05% male.</p> <p>Leisure Centre usage for the financial year 2017/18 was 1,212,357 visits across the portfolio of 11 facilities.</p> |
|----------|---|

CONSULTATION

| | |
|----------|---|
| 7 | <p>Please outline the consultation / engagement process and outline any key findings.</p> <p>The change forms part of CCBC draft budget consultation process which will aim to seek the views of Caerphilly County Borough residents and will be updated further or as required upon completion.</p> |
|----------|---|

MONITORING AND REVIEW

| | |
|-----------|---|
| 8 | <p>How will the proposal be monitored?</p> <p>The proposal will be monitored through the use of well-established communication processes for customer engagement and feedback.</p> |
| 9 | <p>How will the monitoring be evaluated?</p> <p>Regular engagement with groups, clubs and organisations using established and robust communication methods</p> |
| 10 | <p>Have any support / guidance / training requirements been identified?</p> <p>No</p> |

| | |
|-----------|--|
| 11 | <p>Where you have identified mitigating factors in previous answers that lessen the impact on any particular group in the community, or have identified any elsewhere, please summarise them here.</p> <p>Not applicable.</p> |
|-----------|--|

| | | | | | | | | | | | | | |
|-----------|--|--|---|---|-----------|--|--|-----------|--|---|-----------|--|--|
| 12 | <p>What outcome does this Equality Impact Assessment suggest you take? You might find that more than one applies. Please explain why you have come to this decision.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%;">Outcome 1</td> <td style="width: 10%; text-align: center;">X</td> <td>No major change needed – the EIA hasn't identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken</td> </tr> <tr> <td>Outcome 2</td> <td></td> <td>Adjust the policy to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?</td> </tr> <tr> <td>Outcome 3</td> <td></td> <td>Continue the policy despite potential for negative impact.</td> </tr> <tr> <td>Outcome 4</td> <td></td> <td>Stop and rethink the policy when the EIA shows actual or potential unlawful discrimination.</td> </tr> </table> | Outcome 1 | X | No major change needed – the EIA hasn't identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken | Outcome 2 | | Adjust the policy to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified? | Outcome 3 | | Continue the policy despite potential for negative impact. | Outcome 4 | | Stop and rethink the policy when the EIA shows actual or potential unlawful discrimination. |
| Outcome 1 | X | No major change needed – the EIA hasn't identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken | | | | | | | | | | | |
| Outcome 2 | | Adjust the policy to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified? | | | | | | | | | | | |
| Outcome 3 | | Continue the policy despite potential for negative impact. | | | | | | | | | | | |
| Outcome 4 | | Stop and rethink the policy when the EIA shows actual or potential unlawful discrimination. | | | | | | | | | | | |
| | <p>Our Assessment is Outcome 1 – Continue the Policy</p> <p>We have reached this conclusion because the EIA has not identified any potential for discrimination or negative impact on groups with protected characteristics. This assessment will be further updated upon completion of the draft CCBC budget consultation exercise.</p> | | | | | | | | | | | | |

| | |
|---------------------------------|-------------------------------------|
| Completed by: | Jeff Reynolds |
| Date: | 12/11/2018 |
| Position: | Sports & Leisure Facilities Manager |
| Name of Head of Service: | ROBERT HARTSHORN |