

Equalities Impact Assessment (EIA)

EIAs make services better for everyone and support value for money by getting services right first time.

EIAs enable us to consider all the information about a service, policy or strategy from an equalities perspective and then create an action plan to get the best outcomes for service users and staff¹. They analyse how all our work as a council might impact differently on different groups protected from discrimination by the Equality Act 2010². They help us make good decisions and evidence how we have reached them.³

An EIA needs to be started as a project starts to identify and consider possible differential impacts on people and their lives, inform project planning and, where appropriate, identify mitigating actions. A full EIA must be completed before any decisions are made or policy agreed so that the EIA informs that decision or policy. It is also a live document; you should review and update it along with your project plan throughout.

You should first consider whether you need to complete this full EIA⁴.

Other key points to note:

- Full guidance notes to help you are embedded in this form see the End Notes or hover the mouse over the numbered notes.
- Please share your EIA with your Equalities Champion and the final/updated version at the end of the project.
- Major EIAs should be reviewed by the relevant Head of Service.
- Examples of completed EIAs can be found on the Equalities Hub

1. Responsibility for the EIA	
Title of proposal	Finchley Lido Leisure Centre Redevelopment
Name and job title of completing officer	Cassie Bridger
Head of service area responsible	
Equalities Champion supporting the EIA	
Performance Management rep	N/A
HR rep (for employment related issues)	N/A
Representative (s) from external stakeholders	

2. Description of proposal

Is this a: (Please tick all that apply)	
New policy /strategy / function / procedure / service	Review of Policy /strategy / function / procedure / service
Budget Saving	Other 🖾
If budget saving please specify value below:	If other, please specify below:
	Proposed leisure centre redevelopment – Finchley Lido Leisure Centre

Please outline in no more than 3 paragraphs⁵:

This EqIA is being conducted on the proposed redevelopment of Finchley Lido Leisure Centre. The Outline Business Case included within the Cabinet report (November 2023) includes a number of items which have been assessed for consideration to ensure that a future proposal considers;

- Strategies and Policy (National, Regional and Local)
- Supply and Demand Analysis (undertaken as part of the Strategic Outline Case)

• Public Consultation and Engagement.

A new leisure centre is proposed to replace the existing Finchley Lido Leisure Centre, which is currently located within the Great North Leisure Park (GNLP) site. A new facility is proposed for relocation on the adjacent disused bowling green area, the bowling green has not been leased since 2018/1, it is a secure open space that is not accessible to the public and has been subject to anti-social behaviour issues and vandalism.

The Council has undertaken two public consultation exercises in relation to developing proposals; an initial stage from December 2022 to February 2023 on the refurbishment, redevelopment and relocation of Finchley Lido Leisure Centre. The outcome of this was reported to the Councils Policy and Resources Committee in April 2023, alongside a Strategic Outline Case. Policy and Resources Committee approved retaining a leisure facility on the GNLP site and the future redevelopment of a new building, at this stage Committee requested for officers to undertake further public consultation to support in defining a facility mix.

A second stage of public consultation was undertaken during July – September 2023. This stage of consultation was promoted via a range of methods to optimise feedback via;

- Posters within Council owned leisure centres, including a QR code and web address.
- The Council's website, social media accounts and Engage Barnet platform.
- An email to all 'Better' members signed up to receive e-newsletter updates.
- Letter distribution within radius of existing leisure facility.
- Email update to all partners and Fit and Active Barnet (FAB) Network.
- Updates provided within Barnet First Newsletter.

In addition, the following activities were co-ordinated;

- Targeted workshops hosted during July 2023, held at the Art Depot, Finchley Lido Leisure Centre and Barnet Mencap.
- Drop-in sessions hosted throughout August 2023
- An online survey which ran from July September 2023.

The results of the public consultation and engagement, coupled with the supply and demand analysis, in addition to stakeholder feedback has identified the following facility mix for pursual;

Facility Mix Options		Option B
	Health and Fitness Gym	690 sqm

x F – Equalities inipact Assessine	
Studios	3 studios including cycling studio
Swimming Pool	25m x 6 lanes
Learner Pool	13m x 10m
Leisure Water	Splash pad & leisure pool with waves
Indoor Adventure Zone	Yes
Indoor Climbing	No
Soft Play	Yes
Thermal Spa	Sauna and steam
Party Rooms	Yes x 3
Health consultation rooms	Yes x 3
Café	Coffee shop style
Lido	20m x 3 lane & shallow children's
	pool
Total gross internal floor area (est)	6,950 sqm

It is proposed that a new facility will comply with all the requirements of current legislation, including the Equality Act 2010 and building regulations. Further to this, the Council will ensure that the specification for a new leisure centre takes account of the needs of the broadest range of requirements and needs as possible, through engagement with stakeholders and identified under-represented groups.

	What does the data tell you ⁶ ?	What do people tell you ⁷ ?
Protected group	Provide a summary of any relevant demographic data about the borough's population from the Joint Strategic Needs Assessment or data about the council's workforce	Provide a summary of relevant consultation and engagement including surveys and other research with stakeholders, newspaper articles correspondence etc.
Age ⁸	The table below shows the percentage breakdown of the total population within Barnet (Census 2021)	 As part of the strategic outline case and feasibility study, the demographic profile and local catchment was assessed. Findings from this, alongside engagement and demand analysis helped to establish a core facility mix, incorporating findings such as a need to increase swimming, fitness and provision for young people in the borough. A new facility is proposed to include an increased range and enhancement to the existing offer, improving the quality and experience of all users. The proposed location of a new facility will remain accessible and provide improved connectivity to Glebelands Open Space, enhancing the relationship between indoor and outdoor leisure activities. Feedback throughout the consultation process endorsed this approach, rather than locating at the front of the GNLP site, which was viewed to create a disconnect and a possible impact on experience.

	What does the data tell you ⁶ ?	What do people tell you ⁷ ?
Protected group	<i>Provide a summary of any relevant demographic data about the borough's population from the <u>Joint Strategic Needs Assessment,</u> <i>or data about the council's workforce</i></i>	Provide a summary of relevant consultation and engagement including surveys and other research with stakeholders, newspaper articles correspondence etc.
Disability ⁹	New figures from Census 2021 show 14.2% of Barnet's population are disabled under the Equality Act (2010), with their day-to-day activities being limited a little (7.8%) or a lot (6.4%). The Sport England Active Lives Survey (Nov 21/22) demonstrates that 61.8% of adults with a disability and/or long-term health condition are active in Barnet for at least 150 minutes per week.	Finchley Lido has benefited from investment to improve accessibility, including a dedicated changing places area. However, the existing facility does not fully lend itself or incorporate the design requirements that would enable it to meet the full requirements of the Equalities Act. For example, limited viewing areas, narrow access throughout circulation areas.
		Whilst there is a high level of usage by disabled users, a new facility would encompass a range of design and building features that would support increased participation and user experiences.
		The project team will engage with key stakeholders to understand scheme specific requirements to maximise the functionality for all users.
Gender reassignment ¹⁰	Active Lives Data Not Reportable	The current building does not include any design features that encourage service users who are undertaking, or who have undertaken, gender reassignment to make use of the facilities.
		No issues were raised throughout the consultation periods.

	What does the data tell you ⁶ ?	What do people tell you ⁷ ?			
Protected	Provide a summary of any relevant demographic data about the	Provide a summary of relevant consultation and engagement			
group	borough's population from the Joint Strategic Needs Assessment,	including surveys and other research with stakeholders,			
	or data about the council's workforce	newspaper articles correspondence etc.			
		The project team will engage with key stakeholders, such as			
		the Councils existing leisure operated to learn more about			
		new leisure centre build projects which have considered and			
		incorporated design elements to ensure that a new facility			
		incorporates an appropriate changing room design.			
Marriage and	Active Lives Data Not Reportable	No issues were raised during the consultation.			
Civil		There is no anticipated impact in respect of residents who are			
Partnership ¹¹		or are not married or in a civil partnership.			
	Active Lives Data Not Reportable	The project team will utilise best practice and engage with			
Pregnancy		key to ensure that a new facility can fulfil specific needs,			
and		including changing room privacy, (where preferred) areas for			
Maternity ¹²		private breastfeeding, and safe spaces to oversee children			
		while they participate in activities, e.g. swimming or soft play			
	Allowing for rounding, the table below show the percentage breakdown	The Project Team will continue to engage with community			
	of people in Barnet by race/ethnicity (Census 2021):	groups and religious communities to ensure that any specific			
	Race/ethnicity %	design requirements are known and, where appropriate,			
Race/	Asian 19.3%	included in the final build. The consultation and engagement			
Ethnicity ¹³	Black 7.9%	programme will specifically seek to identify specific needs. It			
	Mixed/Other 15.2% White 57.7%	is also noted that gender specific provision (see section on			
	Total 100.1%	sex below) may be helpful in terms of facilitating access and			
	100.1%	use by specific ethnic groups.			

Protected group	What does the data tell you ⁶ ?Provide a summary of any relevant demographic data about the borough's population from the Joint Strategic Needs Assessment, or data about the council's workforceThe Sport England Active Lives Survey (Nov 21/22) demonstrates	What do people tell you ⁷ ? Provide a summary of relevant consultation and engagement including surveys and other research with stakeholders, newspaper articles correspondence etc.
	that 69.9% of residents that identify as White British, 66.4% White Other and 54.7% Asian (excluding Chinese) are active for at least 150 minutes per week.	
	The Sport England Active Lives survey is unable to report participation levels amongst any other BAME groups due to the limited sample size recruited (500 random sample)	
	The Sport England Active Lives Survey (Nov 21/22) demonstrates that 75.6% No Religion, 60.5% Christian are active for at least 150 minutes per week.	The Project Team will continue to engage with community groups and religious communities to ensure that any specific design requirements are known and, where appropriate,
Religion or belief ¹⁴	The Sport England Active Lives survey is unable to report participation levels amongst any Faith groups due to the limited sample size recruited (500 random sample).	included in the final build.
Sex ¹⁵	The table below shows the percentage of the Population of Barnet by sex (Census 2021).	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

Protected group	Provide a summary of any relevant demographic data about the borough's population from the Joint Strategic Needs Assessment, or data about the council's workforceF		ssessment, including surveys and other research with stakeholders, newspaper articles correspondence etc.
Sexual Orientation ¹⁶	Active Lives Data Not Re	portable	No issues were raised during the consultation, however any new adopted programme / provision within a new facility will be reviewed by the Council and the operator to ensure it meets the needs of all Barnet residents.
Other relevant groups ¹⁷	Active Lives Data Not Re	portable	None

Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Is there an impact on service	a)	Negative impact		act
	deliver? Is there an impact on customer satisfaction? Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Minor	Major	No impact
Age	Will assist in meeting increasing demand. A wide range and increase number of facilities are proposed, which consider the results of the public consultation. This is in addition to dedicated spaces such as health consultation rooms which can be utilized for more targeted interventions.				
Disability	A new leisure centre will adopt an inclusive design approach, which will be reflected in functionality, equipment, signage and facilities.				
Gender reassignment	No reported impact				
Marriage and Civil Partnership	No reported impact				
Pregnancy and Maternity	No reported impact				
Race/ Ethnicity	New facilities will need to consider any specific needs in a proportionate manner. It is expected that new, improved facilities will provide opportunities for residents to become more active.				
Religion or belief	New facilities will need to consider any specific religious or cultural beliefs in a proportionate manner. It is expected that new, improved facilities will provide residents to become more active, this will be achieved through improved design				

What does the evid Protected characteristic	ce tell you about the impact your proposal may have on groups with protected chara For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Is there an impact on service		? Negative impact		act
	deliver? Is there an impact on customer satisfaction? Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Minor	Major	No impact
	and functionality of certain zones and spaces, including the provision available within the facility (eg changing rooms, single sex swimming classes).				
Sex	No reported impact				
Sexual Orientation	No reported impact				

5. Other key groups Are there any other vulnerable groups that might be affected by the proposal?	e L		ative bact	pact
These could include carers, people in receipt of care, lone parents, people with low incomes or unemployed	Positiv impact	Minor	Major	No imp

Key groups	None known		\boxtimes

6. Cumulative impact¹⁹

Considering what else is happening within the council and Barnet could your proposal contribute to a cumulative impact on groups with protected characteristics?

Yes No

7. Actions to mitigate or remove negative impact Only complete this section if your proposals may have a negative impact on groups with protected characteristics. These need to be included in the relevant service plan for mainstreaming and performance management purposes.								
Group affected	Potential negative impact	Mitigation measures ²⁰ If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	Monitoring ²¹ How will you assess whether these measures are successfully mitigating the impact?	Deadline date	Lead Officer			
All								

8. Outcome of the Equalities Impact Assessment (EIA)²²

Please select one of the following four outcomes

Proceed with no changes

The EIA has not identified any potential for a disproportionate impact and all opportunities to advance equality of opportunity are being addressed

Proceed with adjustments

Adjustments are required to remove/mitigate negative impacts identified by the assessment

☐ Negative impact but proceed anyway

This EIA has identified negative impacts that are not possible to mitigate. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below

Do not proceed

This EIA has identified negative impacts that cannot be mitigated and it is not possible to continue. Outline the reasons for this and the information used to reach this decision in the space below

Reasons for decision

Sign-off

9.Sign off and approval by Head of Service / Strategic lead ²³						
Name Cassie Bridger	Job title Service: Assistant Director- Greenspaces & Leisure					
Tick this box to indicate that you have approved this EIA		Date of approval:				
Tick this box to indicate if EIA is to be published IF REQUIRED	Date of next review:					

Footnotes: guidance for completing the EIA template

¹ The following principles explain what we must do to fulfil our duties under the Equality Act when considering any new policy or change to services. They must all be met or the EIA (and any decision based on it) may be open to challenge:

- **Knowledge:** everyone working for the council must be aware of our equality duties and apply them appropriately
- Timeliness: the duty applies at the time of considering proposals and before a final decision is taken
- **Real Consideration:** the duty must be an integral and rigorous part of your decision-making and must influence the process.
- **Sufficient Information:** you must assess what information you have and what is needed to give proper consideration.
- **No delegation:** the council is responsible for ensuring that anyone who provides services on our behalf complies with the equality duty.
- **Review:** the equality duty is a continuing duty it continues after proposals are implemented/reviewed.
- **Proper Record Keeping:** we must keep records of the process and the impacts identified.

² Our duties under the Equality Act 2010

The council has a legal duty under this Act to show that we have identified and considered the impact and potential impact of our activities on all people with 'protected characteristics' (see end notes 9-19 for details of the nine protected characteristics). This applies to policies, services (including commissioned services), and our employees.

We use this template to do this and evidence our consideration. You must give 'due regard' (pay conscious attention) to the need to:

- Avoid, reduce or minimise negative impact: if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately.
- Promote equality of opportunity: by
 - Removing or minimising disadvantages suffered by people with a protected characteristic
 - Taking steps to meet the needs of these groups
 - Encouraging people with protected characteristics to participate in public life or any other activity where
 participation is disproportionately low
 - Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary
- Foster good relations between people who share a protected characteristic and those who don't: e.g. by promoting understanding.

³ EIAs should always be proportionate to:

- The size of the service or scope of the policy/strategy
- The resources involved
- The size of the likely impact e.g. the numbers of people affected and their vulnerability

The greater the potential adverse impact of the proposal on a protected group (e.g. disabled people) and the more vulnerable the group is, the more thorough and demanding the process required by the Act will be. Unless they contain sensitive data – EIAs are public documents. They are published with Cabinet papers, Panel papers and public consultations. They are available on request.

⁴ When to complete an EIA:

- When developing a new policy, strategy, or service
- When reviewing an existing service, policy or strategy
- When making changes that will affect front-line services
- When amending budgets which may affect front-line services
- When changing the way services are funded and this may impact the quality of the service and who can access it
- When making a decision that could have a different impact on different groups of people
- When making staff redundant or changing their roles

Wherever possible, build the EIA into your usual planning and review processes.

Also consider:

- Is the policy, decision or service likely to be relevant to any people because of their protected characteristics?
- How many people is it likely to affect?
- How significant are its impacts?
- Does it relate to an area where there are known inequalities?
- How vulnerable are the people who will be affected?

If there are potential impacts on people but you decide <u>not</u> to complete an EIA you should document your reasons why.

⁵ Focus of EIA: A member of the public should have a good understanding of the proposals being assessed by the EIA after reading this section. Please use plain English and write any acronyms in full first time - eg: 'Equality Impact Assessment (EIA)'

This section should explain what you are assessing:

- What are the main aims or purpose of the proposed change?
- Who implements, carries out or delivers the service or function in the proposal? Please state where this is more than one person or group, and where other organisations deliver it under procurement or partnership arrangements.
- How does it fit with other services?
- Who is affected by the service, or by how it is delivered? Who are the external and internal service-users, groups, or communities?
- What outcomes do you want to achieve, why and for whom? E.g.: what do you want to provide, what changes or improvements, and what should the benefits be?
- What do existing or previous inspections of the service tell you?
- What is the reason <u>for</u> the proposed change (financial, service, legal etc)? The Act requires us to make these clear.

⁶ Data & Information: Your EIA needs to be informed by data. You should consider the following:

- What data is relevant to the impact on protected groups is available? (is there an existing EIA?, local service data, national data, community data, similar proposal in another local authority).
- What further evidence is needed and how can you get it? (e.g. further research or engagement with the affected groups).
- What do you know from service/local data about needs, access and outcomes? Focus on each characteristic in turn.
- What might any local demographic changes or trends mean for the service or function? Also consider national data if appropriate.

- Does data/monitoring show that any policies or practices create particular problems or difficulties for any group(s)?
- Is the service having a positive or negative effect on particular people or groups in the community?

⁷ What have people told you about the service, function, area?

- Use service user feedback, complaints, audits
- Conduct specific consultation or engagement and use the results
- Are there patterns or differences in what people from different groups tell you?
- Remember, you must consult appropriately and in an inclusive way with those likely to be affected to fulfil the equality duty.
- You can read LBB<u>Consultation and Engagement toolkit</u> for full advice or contact the Consultation and Research Manager, <u>rosie.evangelou@barnet.gov.uk</u> for further advise

⁸ Age: People of all ages, but consider in particular children and young people, older people and carers, looked after children and young people leaving care. Also consider working age people.

⁹ **Disability**: When looking at disability, consideration should be given to people with different types of impairments: physical (including mobility), learning, aural or sensory (including hearing and vision impairment), visible and non-visible impairment. Consideration should also be given to: people with HIV, people with mental health needs and people with drug and alcohol problems. People with conditions such as diabetes and cancer and some other health conditions also have protection under the Equality Act 2010.

¹⁰ **Gender Reassignment:** In the Act, a transgender person is someone who proposes to, starts or has completed a process to change their gender. A person does not need to be under medical supervision to be protected. Consider transgender people, transsexual people and transvestites.

¹¹ Marriage and Civil Partnership: consider married people and civil partners.

¹² **Pregnancy and Maternity:** When looking at pregnancy and maternity, give consideration to pregnant women, breastfeeding mothers, part-time workers, women with caring responsibilities, women who are lone parents and parents on low incomes, women on maternity leave and 'keeping in touch' days.

¹³ **Race/Ethnicity:** Apart from the common ethnic groups, consideration should also be given to Traveller communities, people of other nationalities outside Britain who reside here, refugees and asylum seekers and speakers of other languages.

¹⁴ **Religion and Belief:** Religion includes any religion with a clear structure and belief system. As a minimum you should consider the most common religious groups (Christian, Muslim, Hindu, Jews, Sikh, Buddhist) and people with no religion or philosophical beliefs.

¹⁵ **Sex/Gender:** Consider girls and women, boys and men, married people, civil partners, part-time workers, carers (both of children with disabilities and older cares), parents (mothers and fathers), in particular lone parents and parents on low incomes.

¹⁶ Sexual Orientation: The Act protects bisexual, heterosexual, gay and lesbian people.

¹⁷ Other relevant groups: You should consider the impact on our service users in other related areas.

¹⁸ **Impact:** Your EIA must consider fully and properly actual and potential impacts against each protected characteristic:

- The equality duty does not stop changes, but means we must fully consider and address the anticipated impacts on people.
- Be accurate and transparent, but also realistic: don't exaggerate speculative risks and negative impacts.
- Be detailed and specific where you can so decision-makers have a concrete sense of potential effects.
- Questions to ask when assessing whether and how the proposals impact on service users, staff and the wider community:
- Are one or more protected groups affected differently and/or disadvantaged? How, and to what extent?
- Is there evidence of higher/lower uptake of a service among different groups? Which, and to what extent?
- Does the project relate to an area with known inequalities (where national evidence or previous research is available)?
- If there are likely to be different impacts on different groups, is that consistent with the overall objective?
- If there is negative differential impact, how can you minimise that while taking into account your overall aims?
- Do the effects amount to unlawful discrimination? If so the plan **must** be modified.
- Does it relate to an area where equality objectives have been set by LBB in our <u>Barnet 2024 Plan</u> and our <u>Strategic Equality Objective</u>?

¹⁹ Cumulative Impact

You will need to look at whether a single decision or series of decisions might have a greater negative impact on a specific group and at ways in which negative impacts across the council might be minimised or avoided.

²⁰ Mitigating actions

- Consider mitigating actions that specifically address the impacts you've identified and show how they will remove, reduce or avoid any negative impacts
- Explain clearly what any mitigating measures are, and the extent to which you think they will reduce or remove the adverse effect
- Will you need to communicate or provide services in different ways for different groups in order to create a 'level playing field'?
- State how you can maximise any positive impacts or advance equality of opportunity.
- If you do not have sufficient equality information, state how you can fill the gaps.

²¹ **Monitoring:** The Equality Duty is an ongoing duty: policies must be kept under review, continuing to give 'due regard' to the duty. If an assessment of a broad proposal leads to more specific proposals, then further monitoring, equality assessment, and consultation are needed.

²² Outcome:

- Make a frank and realistic assessment of the overall extent to which the negative impacts can be reduced or avoided by the mitigating measures. Also explain what positive impacts will result from the actions and how you can make the most of these.
- Make it clear if a change is needed to the proposal itself. Is further engagement, research or monitoring needed?
- Make it clear if, as a result of the analysis, the policy/proposal should be stopped.

²³ **Sign off:** Your will need to ensure the EIA is signed off by your Head of Service, agree whether the EIA will be published, and agree when the next review date for the EIA will be.