

Equality Impact Assessment (EIA)

Engagement and our equality duty

Whilst [the Gunning Principles](#) set out the rules for consulting ‘everyone’, additional requirements are in place to avoid discrimination and inequality.

Cheshire East Council is required to comply with the Equality Act 2010 and the Public Sector Equality Duty. The Equality Act 2010 simplified previous anti-discrimination laws with a single piece of legislation. Within the Act, the Public Sector Equality Duty (Section 149) has three aims. It requires public bodies to have due regard to the need to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act, by consciously thinking about equality when making decisions (such as in developing policy, delivering services and commissioning from others)
- advance equality of opportunity between people who share a protected characteristic and people who do not share it, by removing disadvantages, meeting their specific needs, and encouraging their participation in public life
- foster good relations between people who share a protected characteristic and people who do not

The Equality Duty helps public bodies to deliver their overall objectives for public services, and as such should be approached as a positive opportunity to support good decision-making.

It encourages public bodies to understand how different people will be affected by their activities so that policies and services are appropriate and accessible to all and meet different people’s needs. By understanding the effect of their activities on different people, and how inclusive public services can support and open up people’s opportunities, public bodies are better placed to deliver policies and services that are efficient and effective.

Complying with the Equality Duty may involve treating some people better than others, as far as this is allowed by discrimination law. For example, it may involve providing a service in a way which is appropriate for people who share a protected characteristic, such as providing computer training to all people to help them access information and services.

The Equality Act identifies nine 'protected characteristics' and makes it a legal requirement to make sure that people with these characteristics are protected from discrimination:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnerships
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Applying the equality duty to engagement

If you are developing a new policy, strategy or programme you may need to carry out an Equality Impact Assessment. You may be able to ascertain the impact of your proposal on different characteristics through desk-based research and learning from similar programmes, but you also need to carry out some primary research and engagement. People with protected characteristics are often described as 'hard to reach' but you will find everyone can be reached – you just need to tailor your approach, so it is accessible for them.

Contacting the [Equality and Diversity mailbox](#) will help you to understand how you can gain insight as to the impacts of your proposals and will ensure that you help the Council to comply with the Equality Act 2010 and the Public Sector Equality Duty.

Section 1 – Details of the service, service change, decommissioning of the service, strategy, function or procedure

Proposal Title	Strategic Leisure Review
Date of Assessment	30.01.2024
Assessment Lead Officer Name	Christopher Allman
Directorate/Service	Place
Details of the service, service change, decommissioning of the service, strategy, function or procedure.	<p>The Strategic Leisure Review is to consider how the council addresses health inequalities across the borough and to explore how to maximise health outcomes for the residents of Cheshire East, from the current value of Council funding towards the delivery of leisure services.</p> <p>It is the "corporate landlord" costs which the council needs to consider in terms of how to fund these costs into the future. As has been felt by all sectors and by residents, costs for utilities have increased significantly over the last 18 months, with no sign of these cost increases stopping.</p> <p>Leisure centres, due to the types of services offered, are some of the most expensive buildings to operate and maintain for the council. The council cannot now afford to continue to fund these costs and hence viable funding alternatives need to be found.</p> <p>As part of the consultation the council is putting forward a number of proposals to change the way Leisure Services are funded in Cheshire East. The council is putting forward these proposals:</p> <ul style="list-style-type: none"> • Changes to the council subsidised options Scheme • Changes to prices for out borough users • Alternative Leisure Services delivery options • Where to focus leisure services as a last resort.

<p>Who is Affected?</p>	<p>Local residents – The main impact will be on (if all or any of the proposals are taken forward) Elderly, people with disabilities, those on certain benefits and young people through the potential reduction in discount options scheme, also the following groups may be affected:</p> <p>Everybody Health and Leisure staff – reduction in the subsidy will potentially impact staffing numbers at those sites.</p> <p>Elected members, town and parish councillors & MPs – Potentially effected through adverse reaction to proposals by constituents.</p> <p>Room hirers/Community Clubs and sports clubs – reducing availability and need to find alternative provision.</p>
<p>Links and impact on other services, strategies, functions or procedures.</p>	<p>The work on the Strategic Leisure review has been co-produced with the councils Public Health team and collaborating closely with the council leisure trust provider, there should be a positive impact in addressing health inequalities in the most deprived areas of the council as identified on Joint Strategic Needs Assessment, as the councils subsidy into leisure services will be targeted according to health need.</p>

<p>How does the service, service change, strategy, function or procedure help the Council meet the requirements of the Public Sector Equality Duty?</p>	<p>Cheshire East Council, through its partner Everybody Health and Leisure (EHL), provides inclusive facilities that cater for the needs of different people.</p> <p>The councils fund a discount options scheme that allows people that meet a certain criterion to access the facilities at discount rate. These include Age 66 and above, people in receipt of disability living allowance, children under 18.</p> <p>EHL have a stated ambition of providing 'Leisure for Life' and seeks to make participation in any recreational activity an enduring habit from the earliest years to later life, helping people to live well and for longer.</p>
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Section 2 - Information – What do you know?

What do you know?	What information (qualitative and quantitative) and/or research have you used to commission/change/decommission the service, strategy, function, or procedure?
<p>Information you used</p>	<p>The information and data used for the review is as follows:</p> <p>Until such time as the final options are chosen it is difficult to quantify the impact it will have on stakeholders that have one or more protected characteristic.</p> <p>By way of example of the impact, if the discount option scheme % is reduced then this could impact on those people with one or protected characteristics ability to afford to attend the leisure centre.</p>

Gaps in your Information	There is gap in attendance figures in relation to attendances at groups that hire the venues, this is being addressed as part of the consultation and this section will be update post consultation to reflect any impact that it would have.
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3. What did people tell you?

What did people tell you	What consultation and engagement activities have you already undertaken and what did people tell you? Is there any feedback from other local and/or external regional/national consultations that could be included in your assessment?
Details and dates of the consultation/s and/or engagement activities	<p>The consultation was promoted to a wide range of stakeholders including:</p> <ul style="list-style-type: none"> • All local Members of Parliament • All Cheshire East Council Ward Members (Councillors) • All local Town and Parish Councils • All local joint-use school headteachers • All members of a council communications subscriber list (approximately 3,500 people) • All council employees • All users of Cheshire East Council funded leisure centres • All users of Cheshire East Council funded libraries <p>Furthermore, Everybody Health and Leisure (the Charitable Trust which currently delivers leisure services on behalf of the council) conducted their own promotion campaign within its leisure centres.</p> <p>The consultation was promoted through the following mediums:</p> <ul style="list-style-type: none"> • Media releases • The council’s Consultation Portal • Social media • Paper consultation packs and posters distributed in all leisure centres and libraries in the borough • The Town and Parish Council network • Council Members Briefings

	<ul style="list-style-type: none"> • Through 1 to 1 emails and conversations with key stakeholders including local Councillors, Town and Parish Councils, Everybody Health and Leisure and local schools <p>In total there were 3,728 consultation engagements, including:</p> <ul style="list-style-type: none"> • 2,760 online survey responses • 522 social media engagements • 392 email responses • 34 event attendees • 11 letter responses • 9 paper survey responses (from 205 distributed in total)
<p>Gaps in consultation and engagement feedback</p>	<p>The consultation was somewhat biased, with a large proportion of the responses being received from three main locations of Cheshire East.</p>

4. Review of information, consultation feedback and equality analysis

Protected characteristics. groups from the Equality Act 2010	What do you know? Summary of information used to inform the proposal	What did people tell you? Summary of customer and/or staff feedback	What does this mean? Impacts identified from the information and feedback (actual and potential). These can be either positive, negative or have no impact.
Age	The proposal is also propositioning a reduction to the discount for over 66 years and 18 years to 20%, with a further proposed reduction to 15%	For the Options concessionary discount scheme there was strong net support for a reduction in the maximum discount offered from 25% down to 20%, with 68% in support of this proposal, and 18% opposing it.	The proposed reduction in the options scheme discount for older and younger people may have a negative impact on individuals' ability to pay.
Disability	<p>People with long-standing illness or health conditions benefit from accessible sport and leisure activities that can boost their rehabilitation or help them maintain their health and wellbeing as well as social and mental health.</p> <p>The facilities comply with DDA regulations, and any new investment will be compliant with planning regulations and will ensure that all activities available within the new facilities will accommodate users with any disability.</p>	For the Options concessionary discount scheme there was strong net support for a reduction in the maximum discount offered from 25% down to 20%, with 68% in support of this proposal, and 18% opposing it.	The proposed reduction in the options scheme discount may have a negative impact on individuals' ability to pay.

	Facilities also include accessible changing rooms, lifts to falls and pool hoist.		
Gender reassignment	<p>EHL doesn't hold gender re-assignment membership data. Census 2021 data could be used for population gender identity data</p> <p>There is no evidence that there will be a detrimental impact for people with this protected characteristic. However, the public consultation will be available for anyone from the protected characteristic to complete.</p>	N/A	There is no evidence that there will be a detrimental impact for people with this protected characteristic. However, the public consultation will be available for anyone from the protected characteristic to complete.
Pregnancy and maternity	EHL doesn't collect pregnancy membership data	N/A	There is no evidence that there will be a detrimental impact for people with this protected characteristic. However, the public consultation will be available for anyone from the protected characteristic to complete.
Race/ethnicity	EHL doesn't hold full and comprehensive data on race of its members or wider users.	N/A	There is no evidence that there will be a detrimental impact for people with this protected characteristic. However, the public consultation will be available for anyone from the protected characteristic to complete.

Religion or belief	EHL doesn't collect religion membership data. Census 2021 will provide ward data	N/A	There is no evidence that there will be a detrimental impact for people with this protected characteristic. However, the public consultation will be available for anyone from the protected characteristic to complete.
Sex	N/A	N/A	N/A
Sexual orientation	EHL does not collect sexual orientation data.	N/A	There is no evidence that there will be a detrimental impact for people with this protected characteristic. However, the public consultation will be available for anyone from the protected characteristic to complete.
Marriage and civil partnership	EHL does not collect marriage and civil partnership data	N/A	There is no evidence that there will be a detrimental impact for people with this protected characteristic. However, the public consultation will be available for anyone from the protected characteristic to complete.

5. Justification, Mitigation and Actions

Mitigation	What can you do?
<p>Actions to mitigate any negative impacts or further enhance positive impacts</p>	<p>Actions to mitigate any negative impacts or further enhance positive impacts</p>
<p>Please provide justification for the proposal if negative impacts have been identified?</p> <p>Are there any actions that could be undertaken to mitigate, reduce or remove negative impacts?</p>	<p>There are a number of potential ways Cheshire East Council could generate income, or make savings, to meet the income / savings target as set out at the start of the document, the consultation sort the views on a number of areas:</p>

<p>Have all available options been explored? Please include details of alternative options and why they couldn't be considered?</p> <p>Please include details of how positive impacts could be further enhanced, if possible?</p>	<ul style="list-style-type: none"> • Focus on providing a smaller number of core larger leisure sites, withdrawing funding from those sites less well attended • Focus on providing leisure services in the areas of greatest health need, withdrawing funding from sites which by assessment do not meet a minimum threshold level • Implement a differential pricing policy for different grades of membership, like a Gold / Silver / Bronze reflecting the range of service offer. This would allow higher cost activities such as swimming provision to be charged at a different unit rate. • Increase prices across all activities and grades of membership • Reduce opening hours across all leisure sites • Reduce scope of higher unit rate cost services such as swimming offered across all leisure sites • Transfer ownership of leisure sites to other third-party operators, where an interest is expressed and there is a clear business case to do so.
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6. Monitoring and Review -

Monitoring and review	How will the impact of the service, service change, decommissioning of the service, strategy, function or procedure be monitored? How will actions to mitigate negative impacts be monitored? Date for review of the EIA
Details of monitoring activities	The EIA will be update follow the introduction of any proposals and will be reviewed annually
Date and responsible officer for the review of the EIA	January 2025, Chris Allman, Head of Neighbourhood Services

7. Sign Off

When you have completed your EIA, it should be sent to the [Equality, Diversity and Inclusion Mailbox](#) for review. If your EIA is approved, it must then be signed off by a senior manager within your Department (Head of Service or above).

Once the EIA has been signed off, please forward a copy to the Equality, Diversity and Inclusion Officer to be published on the website. For Transparency, we are committed to publishing all Equality Impact Assessments relating to public engagement.

Name	Tom Shuttleworth, Interim Director of Environment and Neighbourhoods
Signature	
Date	

8. Help and Support

For support and advice please contact EqualityandInclusion@cheshireeast.gov.uk