

# EQUALITY IMPACT ASSESSMENT FORM

## 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.

<b>NAME OF NEW OR REVISED PROPOSAL *</b>	Disposal of two playing fields within the grounds of the former Bedwellty Comprehensive School.
<b>DIRECTORATE</b>	Communities
<b>SERVICE AREA</b>	Community & Leisure Services
<b>CONTACT OFFICER</b>	Michael Headington

**\*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.**

## INTRODUCTION

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.

It also helps the Council to meet its legal responsibilities under the Equality Act 2010 (Statutory Duties) (Wales) Regulations 2011, the Welsh Language (Wales) Measure 2011 and supports the wider aims of the Well-being of Future Generations (Wales) Act 2015. There is also a requirement under Human Rights legislation for Local Authorities to consider Human Rights in developing proposals.

Specifically, Section 147 of the Equality Act 2010 is the provision that requires decision-makers to have 'due regard' to the equality implications of their decisions and Welsh Language Standards 88-97 require specific consideration of Welsh speakers under the Welsh Language Standards (No.1) Regulations 2015.

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](#).

## PURPOSE OF THE PROPOSAL

<b>1</b>	<p><b>What is the proposal intended to achieve?</b>  <i>(Please give a brief description of the purpose of the new or updated proposal by way of introduction.)</i></p> <p>The Council has identified the need to dispose of two football fields situated within the grounds of former Bedwellty Comprehensive School, Aberbargoed.</p> <p>Bedwellty Comprehensive School was closed in 2005 and subsequently demolished. The playing fields were fallow however; in 2015 these were brought back into beneficial use by CCBC for use by Fleur-de-Lys AFC as the ground conditions at their previous home ground were unsatisfactory.</p>
<b>2</b>	<p><b>Who are the service users affected by the proposal?</b>  <i>(Who will be affected by the delivery of this proposal? e.g. staff members, the public generally, or specific sections of the public i.e. youth groups, carers, road users, people using country parks, people on benefits etc.)</i></p> <p>The disposal of these playing fields would impact on the following:</p> <ul style="list-style-type: none"> <li>• Fleur-de-Lys AFC who are the current and sole users of the facility;</li> <li>• The local residents;</li> <li>• The local community.</li> </ul>

## IMPACT ON THE PUBLIC AND STAFF

3	<p><b>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?</b></p> <p><i>(What has been done to examine whether or not these groups have equal access to the service, or whether they need to receive the service in a different way from other people?)</i></p> <p>The current users of the facility have indicated that they would like to return to playing sport within the heart of their community i.e. at Fleur-de-Lys. This can be accommodated by ensuring that underutilised facilities at Trelyn Park, Fleur-de-Lys are brought back into beneficial use for the community as a whole.</p> <p>In October 2018, formal consultation including key stakeholders and local residents was undertaken in accordance with the Playing Fields (Community Involvement in Disposal Decisions) (Wales) Regulations 2015 and associated Regulations. Three responses were received from local residents who were all supportive of the site being disposed of. One local resident expressed concerns over congestion from car parking during fixtures.</p> <p>A joint response was received from Sport Wales and Fields in Trust who both objected to the potential loss of the facility. The objection centres on the fact that Fleur-de-Lys AFC will be sharing facilities with Fleur-de-Lys RFC and one football pitch cannot be considered equivalent provision. In terms of local provision, there are 2 pitches in Aberbargoed (adjacent to Hanger 81), 1 in Pengam and four within Cefn Fforest. Consequently, there is no shortage of provision within the locality and all the local teams are/can be accommodated. Also reference is made to the relocation of the pavilion, which should have been considered prior to the sale of the adjoining land. As the request to be relocated to Trelyn Park came from Fleur-de-Lys AFC, this was already considered. As set out in initial report to Cabinet on 25<sup>th</sup> April 2018, the pavilion was not fit for purpose and potential relocation costs and car parking provision were estimated to circa £90K, for which the Council has no budget.</p> <p>In 2015, an extensive review of existing recreational facilities was undertaken and no shortfall in provision within this locality was identified. However, the Council has capital monies and proposes to invest in improving the playing surface (drainage works etc.) at The Ynys, which will bring a further field back into beneficial use. This can then be utilised by either Fleur-de-Lys AFC or Fleur-de-Lys RFC or any other club.</p> <p>Despite positive dialogue with Fleur-de-Lys AFC, a written response was also received but related to the facilities at Trelyn Park and not those at Bedwellty. The points raised related to the condition of the playing surface can be addressed by undertaking an enhanced maintenance programme of rolling, chain harrowing, verti-draining etc., which has already commenced.</p> <p>Reference was also made to safeguarding concerns within the pavilion. Officers have already met both clubs on site to consider options to restrict access inside the pavilion. If there are other concerns officers will continue to work with the clubs to</p>
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	resolve any issues where it can.
	<p><b>Actions required:-</b></p> <ol style="list-style-type: none"><li><b>1. Undertake improvement works to the playing surface on the dual use field at Trelyn Park.</b></li><li><b>2. Undertake improvement works to The Ynys, which can then be utilised as an additional facility for any club.</b></li><li><b>3. Continue to work with both clubs in respect of any potential safeguarding issues identified within the pavilion at Trelyn Park.</b></li><li><b>4. Continue to undertake enhanced maintenance of the dual use pitch at Trelyn Park to improve the condition of the ground.</b></li></ol>

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<b>4. What are the impacts of the proposals?</b>					
Protected Group		Positive Impact?	Negative Impact?	No Specific Impact	What will the impact be? If the impact is negative how can it be mitigated? (action)
<b>Gender</b>	Male	<b>X</b>			
	Female	<b>X</b>			There is potential for the club to expand and be fully inclusive regardless of gender.
	Transgender	<b>X</b>			The Council is sensitive to issues around changing facilities, but has not had any representations' or engagement on this issue to date.
<b>Religion</b>				<b>X</b>	There is no evidence available currently to suggest that there will be a negative impact on any of these protected characteristics. Following the consultation process, this will be reviewed and updated and any impact identified will be mitigated.
<b>Race</b>				<b>X</b>	
<b>Disability</b>				<b>X</b>	
<b>Sexual Orientation</b>				<b>X</b>	
<b>Age</b>	Older People				
	Children and Younger People (Under 25)	<b>X</b>			The relocation of Fleur-de-Lys AFC from Bedwellty School Playing fields to Trelyn Park can only have a positive impact on younger people who participate in sport. The facilities are enhanced and would give opportunities to access other sporting activities such as rugby, which is an integral part of the sport currently played at the park. Having the football club relocated to Trelyn Park could also increase local participation in sport.
<b>Marriage &amp; Civil Partnership</b>				<b>X</b>	There is no evidence available to the Council currently to suggest that there will be a negative impact on any of these protected characteristics. Following the consultation process this will be reviewed and updated and any impact identified will be mitigated,
<b>Pregnancy &amp; Maternity</b>				<b>X</b>	No direct impact.
<b>Socio-economic Background</b>		<b>X</b>			The relocation of Fleur-de-Lys AFC to Trelyn Park could have a positive impact on the local economy. There are opportunities for the two clubs to form a Sport Association and access funding not only to enhance facilities at the park but to grow both clubs and bring more spectators etc. to the locality. In addition, if the land at Bedwellty is sold for affordable housing development, this could bring employment opportunities to the locality and thus enhance the local economy.



	X			<p>This in itself will create a more attractive and safe environment. If both clubs work closer together and form an overarching sporting association, this will also generate community links.</p> <p><b><u>A Wales of Vibrant Culture and Thriving Welsh Language</u></b>  There is no evidence to suggest that the disposal of the playing fields would have any detrimental effect on culture, heritage or the use of the Welsh language. However the re-location of Fleur-de-Lys AFC to Trelyn Park could encourage participation in sport and recreation.</p> <p><b><u>A Globally Responsible Wales</u></b>  The proposed disposal of the playing fields will have a positive impact and make significant contributions to the well-being of residents. If the site is sold for residential development, it will bring employment opportunities to the local area, increase affordable housing levels and thus enhance the local economy. It will also provide opportunities for both clubs to increase participation in sport and physical activity and with increased users at Trelyn Park, create a safer and enhanced environment.</p>
	X			

5	<p><b>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.</b></p> <p><i>(The specific Policy Making Standards requirements are Standard numbers 88, 89, 90, 91, 92 and 93. The full detail of each Standard is available on the Equalities and Welsh Language Portal)</i></p> <p>The disposal of the two playing fields at the former Bedwellty Comprehensive School 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>
	<p><b>Actions required: None</b></p>

## INFORMATION COLLECTION

6	<p><b>Is full information and analysis of users of the service available?</b></p> <p><i>(Is this service effectively engaging with all its potential users or is there higher or lower participation of uptake by one or more groups? If so, what has been done to address any difference in take up of the service? Does any savings proposals include an analysis of those affected?)</i></p> <p>This proposal only effects the known users of the facility i.e. Fleur-de-Lys AFC.</p>
	<p><b>Actions required: None</b></p>

## CONSULTATION

7	<p><b>What consultation has taken place?</b></p> <p><i>(What steps have been taken to ensure that people from various groups have been consulted during the development of this proposal? Have the Council's Equalities staff been consulted? Have you referred to the Equalities Consultation and Monitoring Guidance?)</i></p> <p>Full public consultation has been undertaken in accordance with the Playing Fields (Community Involvement in Disposal Decisions) (Wales) Regulations 2015 and associated Regulations.</p>
	<p><b>Actions required: None</b></p>



## MONITORING AND REVIEW

8	<p><b>How will the proposal be monitored?</b>  <i>(What monitoring process has been set up to assess the extent that the service is being used by all sections of the community, or that the savings proposals are achieving the intended outcomes with no adverse impact? Are comments or complaints systems set up to record issues by Equalities category to be able analyse responses from particular groups?)</i></p> <p>A 'decisions report', has been formulated and summarise all representations received. This will then be presented to Cabinet on 27<sup>th</sup> February 2019, who will decide whether the playing fields should be disposed of or not. This EIA has been updated accordingly.</p>
	<p><b>Actions required:</b></p> <p><b>If Cabinet are minded to approve the disposal of the playing fields, there are strict measures and timescales (which are set out within the report at paragraph 4.9), which must be followed.</b></p>
9	<p><b>How will the monitoring be evaluated?</b>  <i>(What methods will be used to ensure that the needs of all sections of the community are being met?)</i></p> <p>This will be monitored via the questions included within the consultation.</p>
	<p><b>Actions required: None</b></p>
10	<p><b>Have any support / guidance / training requirements been identified?</b>  <i>(Has the EIA or consultation process shown a need for awareness raising amongst staff, or identified the need for Equalities or Welsh Language training of some sort?)</i></p> <p>No</p>
	<p><b>Actions required: None</b></p>
11	<p><b>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.</b></p> <p>All responses received via the consultation process have been considered and mitigated against (see below) to lessen any potential impact:-</p>

### Summary of Proposed Actions:-

1. Undertake improvement works to the playing surface on the dual use field at Trelyn Park.
2. Undertake improvement works to The Ynys, which can then be utilised as an additional facility for any club.
3. Continue to work with both clubs in respect of any potential safeguarding issues identified within the pavilion at Trelyn Park.
4. Continue to undertake enhanced maintenance of the dual use pitch at Trelyn Park to improve the condition of the ground.
5. If Cabinet are minded to approve the disposal of the playing fields, there are strict measures and timescales (which are set out within the 'decisions report' at paragraph 4.9), which must be followed.

**12** 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.

Outcome 1	X	<b>No major change needed</b> – the EIA hasn't identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken
Outcome 2		<b>Adjust the policy</b> 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		<b>Continue the policy</b> despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are: <ul style="list-style-type: none"> <li>• sufficient plans to stop or minimise the negative impact</li> <li>• mitigating actions for any remaining negative impacts</li> <li>• plans to monitor the actual impact.</li> </ul>
Outcome 4		<b>Stop and rethink the policy</b> when the EIA shows actual or potential unlawful discrimination.

	<p><b>Our Assessment is Outcome 1 – No major change needed</b></p> <p>We have reached this conclusion as no negative impacts have been identified during the process. There are a number of actions proposed and this assessment will be kept under continuing review throughout the process.</p>
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<b>Completed by:</b>	Michael Headington
<b>Date:</b>	3 <sup>rd</sup> January 2019
<b>Position:</b>	Green Spaces & Transport Services Manager