

Equality Analysis Form

1. Introduction

1.1 Purpose of Equality Analysis

The Council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

2. Proposed change

Directorate	PLACE
Title of proposed change	Closure of Purley Leisure Centre
Name of Officer carrying out Equality Analysis	Robert Hunt/ David White

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Purley Leisure Centre is proposed for closure, built in 1982 it is an aging leisure facility where repairs and maintenance costs escalate year on year because the infrastructure has reached the end of its serviceable life. Prior to March 2020 Purley Leisure Centre was operating at a cost of £120k-£180k per year loss to the leisure partnership. Due to the economic downturn the Council are no longer in a position where Purley Leisure Centre can be subsidised by other facilities in the partnership.

Greenwich Leisure Limited (GLL) have experienced some short term financial challenges due to prolonged periods of closure and reduced capacity at their leisure facilities. This has resulted in GLL's London Borough partners providing financial support to cover unavoidable costs during this period. Croydon has provided GLL with a £279,000 interest free loan.

Purley Leisure Centre has remained closed since March 2020. The centre has remained closed for health and safety reasons and because much of the original infrastructure has reached the end of its serviceable life. The ventilation system is awaiting repair at an estimated cost of £200,000. A full refurbishment of the mechanical and electrical plant equipment is expected to cost £2,000,000, with a further £1,000,000 to improve the building.

Permanent closure of Purley Leisure Centre appears to be the most viable option, with users being directed to nearby alternative leisure facility in New Addington and Waddon. The Council will consider evidence from a range of sources, namely: Croydon Observatory data, GLL membership data, feedback from complaints, freedom of information requests and elected member enquiries.

There are other GLL operated leisure facilities and activities at Waddon (1.9 miles) and New Addington (5.7 miles) in the south of the borough. We acknowledge that the leisure centre has been in the local community for decades and are very much established and valued in their local communities, especially by older residents and those accessing swimming activities. During the early stages of the Covid-19 pandemic when leisure centres were allowed to re-open work was undertaken to relocate the Purley Leisure Centre Health & Fitness members and Swim School pupils, with a high number moving their memberships to either Waddon or New Addington.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Deciding whether the potential impact is positive or negative

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.																									
Protected characteristic group(s)	Positive impact	Negative impact			Source of evidence																				
Age	Health & Fitness members and Swim School pupils at Purley Leisure Centre have already been offered to transfer memberships to another Better Leisure Centre (Waddon or New Addington Leisure Centre's are most local). Waddon and New	<p>Purley Leisure Centre is the boroughs southernmost public leisure centre. Whilst the facility is located in the community council area of Purley & Woodcote it should be acknowledged that it provides the primary public leisure facility for many residents living across the boroughs eleven community council wards located south of Croydon town centre.</p> <p>Croydon: Croydon residents 386,710 (ONS 2019):</p> <ul style="list-style-type: none"> • 22.2% (85,672) aged 0-15 • 64.1% (247,841) aged 16-64 • 13.8% (53,197) 65 and over <p>Table 1: Percentage breakdown of resident's age groups living in Coulsdon, Purley & Woodcote and Croydon as a whole.</p> <table border="1"> <thead> <tr> <th>Age Category</th> <th>% Coulsdon Residents</th> <th>% Purley Residents</th> <th>% Croydon Residents</th> <th>Coulsdon/ Purley Avg. v Croydon Difference</th> </tr> </thead> <tbody> <tr> <td>Persons age 0 - 4</td> <td>6.2</td> <td>6.7</td> <td>7.2</td> <td>-0.75</td> </tr> <tr> <td>Persons age 5 - 9</td> <td>6.5</td> <td>5.5</td> <td>7.1</td> <td>- 1.1</td> </tr> <tr> <td>Persons age 10 - 14</td> <td>6.1</td> <td>6.2</td> <td>6.7</td> <td>-0.55</td> </tr> </tbody> </table>	Age Category	% Coulsdon Residents	% Purley Residents	% Croydon Residents	Coulsdon/ Purley Avg. v Croydon Difference	Persons age 0 - 4	6.2	6.7	7.2	-0.75	Persons age 5 - 9	6.5	5.5	7.1	- 1.1	Persons age 10 - 14	6.1	6.2	6.7	-0.55			<p>GLL Active Users Report July 2021 covering period 2019-2020</p> <p>Croydon Observatory data.</p>
Age Category	% Coulsdon Residents	% Purley Residents	% Croydon Residents	Coulsdon/ Purley Avg. v Croydon Difference																					
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Addington are more modern and accessible facilities for families and older residents.

Savings made on closure will enable the partnership to generate an operating surplus. 20% of that surplus is re-invested into improving and maintaining Croydon's Leisure offer for all residents.

Persons age 15 - 19	5.2	5.4	5.7	-0.4
Persons age 20 - 24	4.1	4.6	5.1	-0.75
Persons age 25 - 29	3.9	6	6.5	-1.55
Persons age 30 - 34	4.6	7.3	7.7	-1.75
Persons age 35 - 39	6.4	7.2	7.7	-0.9
Persons age 40 - 44	6.5	6.5	7.2	- 0.7
Persons age 45 - 49	5.9	6.9	6.7	-0.3
Persons age 50 - 54	7.7	6.8	7.1	0.15
Persons age 55 - 59	8.3	7	6.6	1.05
Persons age 60 - 64	6.2	5.8	5.1	0.9
Persons age 65 - 69	5.9	4.7	4	1.3
Persons age 70 - 74	6.2	4.7	3.5	1.95
Persons age 75 - 79	4.3	2.9	2.5	1.1
Persons age 80 - 84	2.7	2.6	1.9	0.75
Persons age 85 and over	3.4	3.1	1.9	1.35

Purley & Woodcote ward has an overall population of 15,831 residents of which there is an above the Croydon average of residents aged 40 years and over. The percentage of over 50's increases against the Croydon average further south into the borough in Council wards such as Coulsdon.

Purley Leisure Centre usage: During the period April 2019 to March 2020 there were 748 registered memberships and 3,003 pay & play users. This amounted to 135,640 unique visits, 6,261 activities, 73,965 gym visits and 93,453 swim users.

Table 2: Breakdown age groups using Purley Leisure Centre

Note: Limitations in the data. Number of users that indicated their age upon registration. Figures do not represent where users reside.

Age Range	Croydon Population	% Croydon Population		Purley LC Users	% Purley LC Users	Purley LC Members as % Croydon Population
0-9	54952	14.00%		742	19.78%	0.22%

10-19	47985	12.06%		611	16.29%	0.18%
20-29	44820	11.04%		266	7.09%	0.08%
30-39	59423	15.03%		311	8.29%	0.09%
40-49	53552	13.09%		293	7.81%	0.09%
50-60	53052	13.70%		353	9.41%	0.11%
60-69	35305	9.04%		686	18.29%	0.21%
70-79	22819	6.00%		390	10.40%	0.12%
80+	14802	3.08%		99	2.64%	0.03%
Totals:	333158			3751		1.13%

The age demographics of Purley and Coulsdon's population is also reflected in centre users. 38.5% of centre users are adults aged 50 years and over, with the majority of the users being over 60 years old. Further support to this figure is highlighted in table 3.

Table 3: The number of older adults accessing free swimming programmes.

Centre	2018 - Over 60's Free Swimming	2018 - Under 16's Free Swimming	2019 - Over 60's Free Swimming	2019 - Under 16's Free Swimming
Purley	16,658	2,978	16,630	2,657
Waddon	7,891	2,814	7,971	3,002
New Addington	6,769	2,260	7,677	2,398
Thornton Heath	4,980	4,282	6,413	4,451
South Norwood	4,756	3,056	5,059	3,199

There is evidence to suggest that user groups have migrated their memberships to other leisure facilities. Furthermore efforts have been made to accommodate services provided at Purley Leisure Centre at other facilities. Given the high proportion of older adults and juniors using the facility it is highly probable that these user groups will be affected the most by permanent closure of Purley Leisure Centre.

To summarise, it is concluded that there would be a disproportionate impact on the following age groups if the proposed closure took place:

- Families with young children (time, logistics, cost)
- Seniors who might find it difficult to travel (cost, fear of crime, fear of injury)

Disability	<p>Health & Fitness members and Swim School pupils at Purley Leisure Centre have already been offered to transfer memberships to another Better Leisure Centre (Waddon or New Addington Leisure Centre's are most local).</p> <p>Waddon and New Addington are more modern and accessible facilities which have hosted a number disability and inclusive sport and physical activity sessions providing wider availability and choice of services.</p>	<p>Purley LC Database:</p> <ul style="list-style-type: none"> Out of 3,751 Purley LC users, 176 have declared a disability (4.6% of users). <p>Table 4: Percentage breakdown of Purley Leisure Centre users by Long Term Health Condition (LTHC) or Disability classification.</p> <table border="1" data-bbox="548 336 996 834"> <thead> <tr> <th>LTHC/ Disability</th> <th>% Breakdown of Purley LC Users with Declared Disability</th> </tr> </thead> <tbody> <tr> <td>LTHC</td> <td>25.30%</td> </tr> <tr> <td>Hearing</td> <td>6.60%</td> </tr> <tr> <td>Learning</td> <td>42.90%</td> </tr> <tr> <td>Multiple</td> <td>6.50%</td> </tr> <tr> <td>Physical</td> <td>17.60%</td> </tr> <tr> <td>Visual</td> <td>1.10%</td> </tr> <tr> <td>Not Specified</td> <td>4.73%</td> </tr> </tbody> </table> <p>Table 5: Breakdown of Purley Leisure Centre and Croydon residents whose day-to-day activities are limited by either a LTHC or Disability.</p> <table border="1" data-bbox="548 1038 1899 1321"> <thead> <tr> <th>LTHC / Disability</th> <th>Croydon Residents</th> <th>% Croydon Residents</th> <th></th> <th>Purley LC</th> <th>% Purley LC Users</th> <th>Difference</th> </tr> </thead> <tbody> <tr> <td>Day-to-day activities limited</td> <td>53,113</td> <td>14.60%</td> <td></td> <td>176</td> <td>4.60%</td> <td>-10.00%</td> </tr> <tr> <td>Day-to-day activities not limited</td> <td>310,265</td> <td>85.40%</td> <td></td> <td>3575</td> <td>95.40%</td> <td>+10.00%</td> </tr> </tbody> </table> <p>Whilst this represents a lower than Croydon population average of users with a disability at Purley Leisure Centre these residents will be disproportionately affected by the closure of facility.</p>	LTHC/ Disability	% Breakdown of Purley LC Users with Declared Disability	LTHC	25.30%	Hearing	6.60%	Learning	42.90%	Multiple	6.50%	Physical	17.60%	Visual	1.10%	Not Specified	4.73%	LTHC / Disability	Croydon Residents	% Croydon Residents		Purley LC	% Purley LC Users	Difference	Day-to-day activities limited	53,113	14.60%		176	4.60%	-10.00%	Day-to-day activities not limited	310,265	85.40%		3575	95.40%	+10.00%	<p>Active Users Report June 2020 covering users 2018-2020</p> <p>Croydon Observatory -ONS 2019.</p> <p>Elected Member Enquiries.</p>
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Savings made on closure will enable the partnership to generate an operating surplus. 20% of that surplus is re-invested into improving and maintaining Croydon's Leisure offer for all residents.

Table 6: Centre users registered as Disabled and/or Long Term Health Condition at other Croydon Leisure Centres.

Disability	Waddon LC	New Addington LC	South Norwood LC	Thornton Heath LC
Total Members	5301	3647	3576	3729
Total LTHC/ Disability	320	223	152	182
LTHC	23.10%	33.20%	36.80%	38.50%
Hearing	7.50%	6.30%	10.50%	4.90%
Learning	41.30%	22.40%	18.50%	28.60%
Multiple	7.50%	14.30%	3.90%	4.40%
Physical	17.20%	18.40%	24.40%	21.40%
Visual	3.40%	5.40%	5.90%	2.20%

Feedback from elected member enquiries and Save Purley Pool campaign have stated that closure would have a disproportionate impact on local residents with a disability because of the additional distance to required to travel to New Addington and Waddon Leisure Centres.

Whilst GLL have accommodated regular Purley Leisure Centre disability swimming group Enterprise into the Waddon Leisure Centre, it should be considered if there is sufficient disabled car parking bays available. Furthermore, additional distance for families travelling from the south of the borough should be considered.

Parking: All developments with associated car parking should have at least two parking bays for use by people with a disability. The appropriate number of bays will depend on the size and nature of the development and boroughs should take into account local issues and estimates of local demand in setting appropriate standards. At present Waddon Leisure Centre has four disabled parking bays out of 34 and New Addington Leisure Centre has two disabled parking bays out of 45.

There is no statutory requirement under the Equality Act 2010 to make provision for a certain number of disabled parking spaces either in a building in its construction or during the course of its subsequent use

This proposal may also impact on service users with invisible disabilities, such as mental health conditions who use the leisure centre to manage such conditions. Use of physical activity to manage mental health conditions is often advised by support organisations, this use may have increased since the Covid 19 restrictions.

		<p>It should also be noted that service users with disabilities are only eligible for a blue badge if they receive Disability Living Allowance or receive Personal Independence Payment and are unable to walk for more than 50 metres. Therefore service users who do not meet this criteria but have mobility issues will be affected by this proposal.</p> <p>In addition some disabled people are allocated Blue badges because of their inability to plan and follow journeys because it may cause psychological distress, such service users would also be affected by the proposals.</p>													
Gender	<p>Health & Fitness members and Swim School pupils at Purley Leisure Centre have already been offered to transfer memberships to another Better Leisure Centre (Waddon or New Addington Leisure Centre's are most local).</p> <p>The new leisure centres, such as Waddon and New Addington, offer a comprehensive range programmes and activities as well as</p>	<p>There were a higher number of females using Purley Leisure Centre than males. The percentage of female representation in user figures exceeds that of the Croydon average. Furthermore, there is a less than 50% female population in the eleven southernmost community council areas in Croydon.</p> <p>Table 7: The makeup of Croydon's population in comparison to Purley Leisure Centre.</p> <table border="1" data-bbox="551 576 1274 863"> <thead> <tr> <th>Gender</th> <th>% Breakdown of Croydon Residents</th> <th>Purley LC Users</th> <th>% Breakdown of Purley LC Users</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>51.5</td> <td>1,966</td> <td>52.40%</td> </tr> <tr> <td>Male</td> <td>48.5</td> <td>1,785</td> <td>47.60%</td> </tr> </tbody> </table> <p>GLL's safeguarding policy recognises that all children, young people and adults at risk have an equal right to protection and are committed to applying the standards laid out consistently, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.</p> <p>When considered that steps have been taken to re-locate memberships and services to other leisure centres there has at no stage been any complaints raised about a disproportionate impact on male or female users.</p> <p>Though no complaints have been raised at this stage, it is possible that female service users may not wish to travel to other centres because of fear of crime, in particular female users who use the leisure centre in the evening.</p>	Gender	% Breakdown of Croydon Residents	Purley LC Users	% Breakdown of Purley LC Users	Female	51.5	1,966	52.40%	Male	48.5	1,785	47.60%	<p>Active Users Report June 2020 covering users 2018-2020</p> <p>Croydon Observatory -ONS 2019.</p>
Gender	% Breakdown of Croydon Residents	Purley LC Users	% Breakdown of Purley LC Users												
Female	51.5	1,966	52.40%												
Male	48.5	1,785	47.60%												

	having gender neutral changing facilities.		
Gender Reassignment	Mixed gender changing facilities at New Addington and Waddon leisure centres remove the risk of users having to binary gender identification	<p>GLL's safeguarding policy recognises that all children, young people and adults at risk have an equal right to protection and are committed to applying the standards laid out consistently, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.</p> <p>Transgender and non-binary service users may not wish to travel to other leisure centres because of fear of hate crime.</p>	Review as part of Libraries Consultation
Marriage or Civil Partnership	None known	<p>GLL does not collect information regarding marriage and civil partnership because it is not required for the service and would exceed GDPR limits for collecting data.</p> <p>Consideration of the characteristic of marriage and civil partnerships need only be in respect of eliminating unlawful discrimination. In this regard, the proposed implementation plan would not in any way exclude individuals who are legally married or in a civil partnership. Therefore, this characteristic should not be disproportionately affected under any of the proposed proposals.</p>	
Religion or belief	None known	<p>GLL's safeguarding policy recognises that all children, young people and adults at risk have an equal right to protection and are committed to applying the standards laid out consistently, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.</p> <p>Prior to March 2020 GLL has worked with organisations such as Ummah Sports that offer women only evenings. This provision has not been available at Purley Leisure Centre so there would be no direct impact to this service related to its closure.</p>	
Race		<p>The Croydon population continues to grow from long-term international migration and 17.1% of the population is made up of non-UK born residents according to ONS 2018 estimates. (Borough Profile)</p> <p>Just like other London boroughs, Croydon has a higher proportion of residents from the BAME communities compared to the national average. There was more diversity in the younger age group population in Croydon in 2011.</p> <p>Table 8: Breakdown of 3,751 registered users at Purley Leisure Centre by ethnicity.</p>	

Ethnicity	PLC Users	%		Croydon	%	Difference
Asian	390	10.40%		59,627	16.40%	-6.00%
Black	281	7.50%		73,256	20.20%	-12.7%
Mixed	323	8.60%		23,895	6.60%	+2%
Other	4	0.10%		6,405	1.80%	-1.7%
White	2,753	73.40%		200,195	55.10%	18.30%

There have been no concerns expressed that the closure of Purley Leisure Centre could worsen existing BAME deprivation in the communities it serves.

Table 9: Breakdown of ethnicity of registered users at other Croydon Leisure Centres.

Ethnicity	Waddon LC	New Addington LC	South Norwood LC	Thornton Heath LC
Total Members	5301	3647	3576	3729
Asian	15.80%	5.30%	6.80%	15.50%
Black	15.30%	18.40%	27.40%	37.70%
Mixed	6.40%	4.80%	6.40%	6.30%
Other	1.60%	1.00%	2.60%	3.60%
White	60.90%	70.40%	56.80%	36.90%

Sexual Orientation

None known

GLL does not collect information regarding sexual orientation because it is not required for the service and would exceed GDPR limits for collecting data. There is no clear evidence to suggest why this group would be disproportionately impacted by the closure of Purley Leisure Centre.

GLL's safeguarding policy recognises that all children, young people and adults at risk have an equal right to protection and are committed to applying the standards laid out consistently, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.

Pregnancy or Maternity	<p>GLL have attempted to accommodate all regular Purley Leisure Centre users into Waddon Leisure Centre and New Addington Leisure Centres. These centres host GLL's 'Swimbies' programme (parent and baby swimming). A provision that was not available at Purley Leisure Centre. Waddon and New Addington Leisure Centres are also newer and more accessible facilities.</p>	<p>Travel time and parking should also be given some consideration in line with feedback on age and disability protected groups.</p> <p>There are currently no 'parent and child' parking space information for New Addington and Waddon.</p>	
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Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

3.2 Additional information needed to determine impact of proposed change

Table 2 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	Information source	Date for completion
To what extent is it reasonable to assume residents can travel an additional 20 to 50 minutes to use another local leisure facility. Issues have been raised via media, FOIs and elected member enquiries as to whether additional travel time is acceptable. The council should engage with Transport For London and residents to ascertain whether current transport, car parking and bike storage facilities at local leisure centers (primarily Waddon and New Addington) is practical and proportionate.	A six week consultation exercise with residents and members of Purley Leisure Centre.	11 th October – 21 st November 2021

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

S e	3	3	6	9
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	2	2	4	6
	1	1	2	3
		1	2	3
Likelihood of Impact				

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Equality Analysis

Table 3 – Impact scores:

Column 1 PROTECTED GROUP	Column 2 LIKELIHOOD OF IMPACT SCORE	Column 3 SEVERITY OF IMPACT SCORE	Column 4 EQUALITY IMPACT SCORE
	<p>Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p>Equality impact score = likelihood of impact score x severity of impact score.</p>
Age	3	2	6
Disability	3	3	9
Gender	2	1	2
Gender reassignment	2	1	2
Marriage / Civil Partnership	2	1	2
Race	2	1	2
Religion or belief	2	1	2
Sexual Orientation	2	1	2
Pregnancy or Maternity	3	2	6

Equality Analysis

4. Statutory duties

4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

- Advancing equality of opportunity between people who belong to protected groups
- Eliminating unlawful discrimination, harassment and victimisation
- Fostering good relations between people who belong to protected characteristic groups

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Important note: Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

Table 4 – Action Plan to mitigate negative impacts. This will be reviewed following outcome of Libraries Consultation after 14 March 2021;

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	176 members of Purley Leisure Centre identify as having a disability. Increased travel time to New Addington or Waddon Leisure Centres.	Consulting with residents for six weeks on the impact of closing Purley Leisure Centre.	Robert Hunt/David White	21/11/2021
		Enterprise Swimming School have already been relocated to Waddon Leisure Centre.	GLL	Complete

Equality Analysis

		Consider increasing disability sport provision in south of borough (RAP Scheme or Palace For Life Foundation sessions) at other local facilities including schools and leisure centres. Investigating disabled parking spaces in neighbouring leisure centres. Investigate access to public transport to visit nearest leisure facilities.	David White David White David White	21/11/2021 21/11/2021 21/11/2021
Race	N/A	Consulting with residents for six weeks on the impact of closing Purley Leisure Centre.	Robert Hunt/David White	21/11/2021
Sex (gender)	N/A	Consulting with residents for six weeks on the impact of closing Purley Leisure Centre.	Robert Hunt/David White	21/11/2021
Gender reassignment	N/A	Consulting with residents for six weeks on the impact of closing Purley Leisure Centre.	Robert Hunt/David White	21/11/2021
Sexual orientation	N/A	Consulting with residents for six weeks on the impact of closing Purley Leisure Centre.	Robert Hunt/David White	21/11/2021
Age	Disproportionate impact on the following age groups if the proposed closure took place: <ul style="list-style-type: none"> Families with young children (time, logistics, cost) 	Consulting with residents for six weeks on the impact of closing Purley Leisure Centre. Investigate access to public transport to visit nearest leisure facilities.	Robert Hunt/David White David White	21/11/2021 21/11/2021

Equality Analysis

	<ul style="list-style-type: none"> Seniors who have told us it is difficult to travel (cost, fear of crime, fear of injury) 			
Religion or belief	N/A	Consulting with residents for six weeks on the impact of closing Purley Leisure Centre.	Robert Hunt/David White	21/11/2021
Pregnancy or maternity	Access to Waddon and New Addington Leisure Centres.	Consulting with residents for six weeks on the impact of closing Purley Leisure Centre. Investigating 'parent and child' parking spaces in neighbouring leisure centres. Investigate access to public transport to visit nearest leisure facilities.	Robert Hunt/David White David White David White	21/11/2021 21/11/2021 21/11/2021
Marriage/civil partnership	N/A	Consulting with residents for six weeks on the impact of closing Purley Leisure Centre.	Robert Hunt/David White	21/11/2021

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter X in column 3 (Conclusion) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.	

Equality Analysis

Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form	
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: XXXXXX Date: XXXXXXXX

7. Sign-Off

Officers that must approve this decision		
Equalities Lead	Name: Date: 27/09/2021	
	Position: Equalities Manager : Denise McCausland,	
Director	Name: Stephen Tate	Date:

	Position: Director for Growth, Employment and Regeneration
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