

<b>Name of the activity being assessed</b>	Future of Daisyfield Pools, November 2023				
<b>Directorate / Department</b>	Environment & Operations	<b>Service</b>	Leisure	<b>Assessment Author</b>	Martin Eden
<b>Is this a new or existing activity?</b>	<input type="checkbox"/> New <input checked="" type="checkbox"/> Existing	<b>Responsible manager / director for the assessment</b>		Martin Eden	
<b>Date EIA started</b>	26/10/2023	<b>Implementation date of the activity</b>		21/11/2022	

**SECTION 1 - ABOUT YOUR ACTIVITY**

<p><b>How was the need for this activity identified?</b>  i.e. Why are we doing this activity?</p>	<p>Daisyfield Pools was closed to the public on 19<sup>th</sup> August 2023 due to serious health and safety concerns relating to positive legionella readings having been found in various parts of the building and the management and condition of the pool plant which resulted in the pools being open for use with little or no chlorine in the pools.</p> <p>On 20<sup>th</sup> October, the Council terminated the existing arrangement with the current operator of Daisyfield Pools, Half Fish HQ CIC, in relation to its occupation and operation at Daisyfield Swimming Pools. The Council has taken possession of the building and it remains closed to the public.</p> <p>A building conditions survey report on Daisyfield Pools has been completed which estimates that the Council would need to spend in excess of £3.135M to undertake significant repairs and maintenance work to make the building fit for purpose. Spending in excess of £3.135M on a swimming pool facility which was originally constructed in 1905 would not pass a value for money test and it is highly likely that further costs would be incurred in addition to the budget estimate of £3.135m due to the age, size and condition of the building.</p> <p>The Council's Revenue Estimates Summary for 2015/16 estimated that Daisyfield Pools would operate with a cash limited budget of £419,200. When the pools were transferred to Half Fish, the revenue budget for Daisyfield Pools was removed from the portfolio's overall budget, therefore the portfolio has no revenue funding available to operate Daisyfield Pools.</p> <p>It is therefore recommended that the building be permanently closed.</p>
<p><b>What is the activity looking to achieve?</b></p> <p><b>What are the aims and objectives?</b></p>	<p>To permanently close Daisyfield Pools and relocate the users to other swimming pools in the Borough, i.e. Blackburn Leisure Centre and Darwen Leisure Centre. The relocation of users from Daisyfield Pools to the Council's other leisure centres and swimming pools will ensure that the aquatic activities take place locally and in a safe environment.</p> <p>The increase in attendances and occupancy levels in the swimming pools at Blackburn Leisure Centre and Darwen Leisure Centre will support our modern swimming pool facilities to remain financially viable.</p>

<b>Services currently provided</b> (if applicable)	<p>The Council provides main pool and small pool facilities at Blackburn Leisure Centre and Darwen Leisure Centre. Additionally, the council provides leisure services at Witton Park Arena, 3 x BSF Community Use schools and outdoor courts and pitches.</p> <p>Through the Leisure Review, Audley Sports &amp; Community Centre asset transferred on 25 year FRL to Jamia Ghosia Association in 2017. The Audley Centre remains open for public use but there are no swimming pool facilities at the site</p>
<b>Type of activity</b>	<input type="checkbox"/> Budget changes <input checked="" type="checkbox"/> Decommissioning <input type="checkbox"/> New activity <input type="checkbox"/> Change to existing activity <input type="checkbox"/> Commissioning <input type="checkbox"/> Other <a href="#">[please state here]</a>

**SECTION 2 - UNDERSTANDING YOUR CUSTOMER****What resources will support in undertaking the equality analysis and impact assessment?**

*Please identify additional sources of information you have used to complete the EIA, e.g. reports; journals; legislation etc.*

The results of the public consultation process and feedback from 294 members of the public has been used to form the basis of the Equality Impact Assessment. Of those who responded to the consultation, 5 stated that they had never used Daisyfield Pools, with regards to the other 289 respondents, 66% had used Daisyfield Pools within 1 month of the closure date; 16% had used Daisyfield Pools between 1-3 months before closure and 16% had used Daisyfield Pools 4 or more months before closure.

A number of actions and proposed actions to mitigate the impact of closing Daisyfield Pools have been included in the Executive Board report - November 2023. The actions including making changes to the pool programme at Blackburn Leisure Centre, introducing additional swimming lessons and taking steps to ensure that customers attending the women only swimming sessions can do so in a private environment. We are also recruiting permanent and casual lifeguards and have received applications from several qualified female lifeguards, so there is a potential opportunity to lifeguard the women's swim sessions with female lifeguards.

**Who are you consulting with? How are you consulting with them? (Please insert any information around surveys and consultations undertaken)****Members**

Ongoing consultation and discussion with Executive Member and two Assistant Executive Members for Public Health and Wellbeing

All councillors are aware of the current closure of Daisyfield Pools – an initial report was considered at Executive Board in September 2023 and Executive board agreed that the building should remain closed until a public consultation process had been undertaken.

Briefings for the Daisyfield and Bastwell ward councillors affected by the decision

**Public & Stakeholders**

A public consultation process took place between Monday 18th September 2023 and Sunday 15th October 2023 to determine the impact on users of the continued closure of Daisyfield swimming pools. An online form was available for users to complete anonymously and paper copies of the consultation form were also available at all 5 libraries, for members of the public to complete. A total of 294 responses to the consultation were received including views from local residents, casual users, parents or guardians of young people who use the pools, local schools, swim clubs, trainee swimmers, and more. The results of the public consultation are detailed in a report which is publically available.

All seventeen schools which used Daisyfield Pools prior to the closure on grounds of health and safety were written to and were provided with a web link to the public consultation survey and a paper copy of the survey. Eleven schools responded to the survey.

Sport England – The Executive Member and Assistant Executive Members for Public Health and Wellbeing and council officers are scheduled to meet with senior officers from the Place Directorate including the facilities team of Sport England in November 2023. The purpose of the meeting is to discuss the closure Daisyfield Pools, the reduction in public swimming pool provision and the potential impact on swimming participation in the Borough and any support which may be forthcoming from Sport England.

<b>Who does the activity impact</b>	Service users	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Indirectly
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<b>upon?*</b>	Members of staff	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Indirectly			
	General public	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Indirectly			
	Carers or families	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Indirectly			
	Partner organisations	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Indirectly			
<b>Does the activity impact positively or negatively on any of the protected characteristics as stated within the Equality Act (2010)?*</b>  <b>The groups in blue are not protected characteristics (please refer to p. 3 of the guidance notes)</b>	Positive impact	<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input checked="" type="checkbox"/> Gender reassignment	<input type="checkbox"/> Marriage & Civil Partnership	<input type="checkbox"/> Pregnancy & maternity	<input type="checkbox"/> Vulnerable groups
		<input type="checkbox"/> Race	<input type="checkbox"/> Religion or belief	<input type="checkbox"/> Sex	<input type="checkbox"/> Sexual orientation	<input type="checkbox"/> Deprived communities	<input type="checkbox"/> Carers
	Negative impact	<input type="checkbox"/> Age	<input type="checkbox"/> Disability	<input type="checkbox"/> Gender reassignment	<input type="checkbox"/> Marriage & Civil Partnership	<input type="checkbox"/> Pregnancy & maternity	<input type="checkbox"/> Vulnerable groups
		<input checked="" type="checkbox"/> Race	<input checked="" type="checkbox"/> Religion or belief	<input type="checkbox"/> Sex	<input type="checkbox"/> Sexual orientation	<input checked="" type="checkbox"/> Deprived communities	<input type="checkbox"/> Carers
	No impact	<input type="checkbox"/> Age	<input type="checkbox"/> Disability	<input type="checkbox"/> Gender reassignment	<input checked="" type="checkbox"/> Marriage & Civil Partnership	<input checked="" type="checkbox"/> Pregnancy & maternity	<input checked="" type="checkbox"/> Vulnerable groups
		<input type="checkbox"/> Race	<input type="checkbox"/> Religion or belief	<input checked="" type="checkbox"/> Sex	<input checked="" type="checkbox"/> Sexual orientation	<input type="checkbox"/> Deprived communities	<input checked="" type="checkbox"/> Carers

**\*If no impact is identified on any of the protected characteristics a full EIA may not be required. Please contact your departmental Corporate Equality & Diversity representative for further information.**

**Does the activity contribute towards meeting the Equality Act's general Public Sector Equality Duty?** *Refer to p.3 of the guidance for more information*  
***A public authority must have 'due regard' (i.e. consciously consider) to the following:***

DUTY	DOES THE ACTIVITY MEET THIS DUTY? EXPLAIN
<b>Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act</b> <i>(i.e. the activity removes or minimises disadvantages suffered by people due to their protected characteristic)</i>	If Daisyfield Pools was to permanently close, there are main pool and small pool facilities at Blackburn Leisure Centre which is located 1 mile away from Daisyfield Pools and at Darwen Leisure Centre which is located c.6 miles from Daisyfield Pools.
<b>Advance equality of opportunity between those who share a protected characteristic and those who do not</b> <i>(i.e. the activity takes steps to meet the needs of people from protected groups where these are different from the needs of other people)</i>	The pool facilities at Blackburn Leisure Centre and Darwen Leisure Centre are modern and fit for purpose and have access to modern equipment and facilities that better supports access for all customers.
<b>Foster good relations between people who share a protected characteristic and those who do not</b> <i>(i.e. the function encourages people from protected groups to participate in public life or in other activities where their participation is disproportionately low)</i>	Services at all other Council owned leisure facilities will still be provided for all customers including those who share protected characteristics.

ASSESSMENT	Is a full EIA required?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
Please explain how you have reached your conclusion <i>(A lack of negative impacts must be justified with evidence and clear reasons, highlight how the activity negates or mitigates any possible negative impacts)</i>			
<p>Whilst we understand that closing Daisyfield Pools will be a change to the current access to leisure in the borough; provision of safe facilities is paramount g. The high standards of provision at both Blackburn Leisure Centre and Darwen Leisure Centre will improve the customer experience of current users of Daisyfield Pools.</p> <p>We will still be providing accessible leisure provision and adhering to our requirement as a local authority under the Equality Act 2010.</p>			

<b>Author Signature</b>		<b>Date</b>	
<b>Head of Service/Director Signature</b>		<b>Date</b>	
<p><i>The above signatures signify acceptance of the ownership of the Initial EIA and the responsibility to publish the completed Initial EIA as per the requirements of the Equality Act 2010.</i></p>			

<b>Departmental E&amp;D Lead Signature</b>		<b>Date</b>	<b>23/10/2023</b>
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**FULL EQUALITY IMPACT ASSESSMENT****SECTION 3 – ANALYSIS OF IMPACT**

Does the activity have the **potential** to:

- **positively** impact (benefit) any of the groups?
- **negatively** impact/exclude/discriminate against any group?
- **disproportionately** impact any of the groups?

Explain how this was identified – through evidence/consultation.

Any negative impacts that are identified within the analysis need to be captured within the action plan in **Section 4**

**N.B.** Marriage & Civil Partnership is only a protected characteristic in terms of work-related activities and NOT service provision

<b>Characteristic</b>	<b>Positive</b>	<b>Negative</b>	<b>Don't know</b>	<b>Reasons for positive and/or negative impact</b> Please include all the evidence you have considered as part of your analysis	<b>Action No.</b>
<b>Age</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Council's swimming pool facilities at Blackburn Leisure Centre and Darwen Leisure Centre have modern equipment and facilities that better supports access for all customers, for example both centres have pool hoists to support people with mobility problems to enter the pools.	
<b>Disability</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Council's swimming pool facilities at Blackburn Leisure Centre and Darwen Leisure Centre have modern equipment and facilities that better supports access for all customers.	
<b>Gender reassignment</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Council's swimming pool facilities at Blackburn Leisure Centre and Darwen Leisure Centre have changing cubicles in village changing rooms rather than male and female changing rooms.	
<b>Marriage &amp; Civil Partnership</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Pregnancy &amp; Maternity</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Race</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	A number of respondents to the consultation raised concerns about the women's only swimming sessions and that there was more privacy at Daisyfield Pools as the main pool is not overlooked and that Half Fish always provided female lifeguards for the women only sessions.	<b>1</b>
<b>Religion or Belief</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	A number of respondents to the consultation raised concerns about the women's only swimming sessions and that there was more privacy at Daisyfield Pools as the main pool is not overlooked and that Half Fish always provided female lifeguards for the women only sessions.	<b>2</b>
<b>Sex</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

<b>Sexual orientation</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Vulnerable Groups</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Deprived Communities</b>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The public consultation asked people how they travelled to the site, 75% of users travel to Daisyfield Pools by car and 21% of users either walked or travelled by public transport. Other means of transport used included private coaches and school buses. A comparison of fees and charges at Daisyfield Pools compared to Blackburn Leisure Centre demonstrated that charges are lower at Blackburn Leisure Centre for the majority of aquatic activities. In addition there are 16.5 hours a week of refresh swimming sessions which cost just £1.00.	<b>3</b>
<b>Carers</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
<b>Other [please state]</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

<p><b>Does the activity raise any issues for community cohesion?</b></p> <p><b>Does the activity contribute positively towards community cohesion?</b></p>	A number of respondents to the consultation raised concerns about the women's only swimming sessions and that there was more privacy at Daisyfield Pools as the main pool is not overlooked and that Half Fish always provided female lifeguards for the women only sessions. Action Plans 1 & 2 are intended to address these issues.
<p><b>Does the activity raise any issues in relation to human rights as set out in the Human Rights Act 1998? Details of which can be found <a href="#">here</a></b></p>	No
<p><b>Does the activity support / aggravate existing departmental and/or corporate risk?</b></p>	<p><i>Is the activity on the departmental risk register? If it is not, should it be?</i></p> <p>No</p>

## CONCLUSIONS OF THE ANALYSIS

<b>Action following completion of the impact assessment</b>			
<i>It is important that the correct option is chosen depending on the findings of the analysis. The action plan must be completed as required.</i>			
<input type="checkbox"/> No major change in the activity	<input type="checkbox"/> Adjust activity	<input checked="" type="checkbox"/> Continue with activity	<input type="checkbox"/> Stop and reconsider activity

**Please explain how you have reached your conclusion**

The Council does not have the capital funding or revenue funding available to re-open Daisyfield Pools. Blackburn Leisure Centre has a main pool and a small pool and is located 1 mile from Daisyfield Pools. The pool programme has been amended to increase the number of children's swimming lessons and school swimming lessons and women only swimming sessions. Steps have been taken to ensure the main pool provides privacy for bathers who attend the women only swim sessions. We have undertaken a review of fees and charges and the cost of using Blackburn Leisure Centre for many aquatic activities is less expensive than using Daisyfield Pools. There is also 16.5 hours of refresh swimming sessions available which cost just £1.00 to access with a refresh card. Refresh cards are issued free of charge to residents and people who work or are educated in the Borough or are registered with a BwD GP.

**ACTION PLAN**

Action No.	What is the negative / adverse impact identified?	Actions required to reduce / mitigate / eliminate the negative impact	Resources required	Responsible officer(s)	Target completion date
1+ 2	A number of respondents to the public consultation raised concerns about the women's only swimming sessions and that there was more privacy at Daisyfield Pools as the main pool is not overlooked and that Half Fish always provided female lifeguards for the women only sessions.	<p>We have arranged to have venetian blinds fitted to the outside of the fitness suite windows so they can be closed for women's only swim sessions are taking place and cannot be adjusted by customers using the fitness suite.</p> <p>We are also fitting blinds to the glazed door leading to the spectator gallery and again these will be closed when the women's only swim sessions are taking place.</p> <p>We will also lock the spectator gallery prior to the women only sessions taking place so no-one can access the gallery and view the main pool.</p> <p>There have been difficulties in guaranteeing female only lifeguards to supervise the women only swim sessions at Blackburn Leisure Centre. However we have recently advertised for permanent and casual lifeguard roles and have received applications from several qualified female lifeguards which provides an opportunity to allocate female lifeguards to supervise these sessions in the future. Any female lifeguards recruited will be rota to work on Tuesday evenings when the women's only sessions take place</p> <p>We will advertise solely for female lifeguards in the next round of recruitment to bolster the number of female lifeguards employed at Blackburn Leisure Centre.</p>	<p>Cost are being obtained and work will be completed</p> <p>Cost are being obtained and work will be completed</p> <p>N/A</p> <p>Lifeguard interviews on 6 November</p> <p>N/A</p>	<p>Kelvin Rutter</p> <p>Kelvin Rutter</p> <p>Ryan Scott</p> <p>Ryan Scott</p> <p>Ryan Scott</p>	<p>9 November 2023</p> <p>9 November 2023</p> <p>Ongoing – Tuesday evenings</p> <p>6 November 2023</p> <p>January 2024</p>

<p>3</p>	<p>Daisyfield Pools is located in a deprived community with low car ownership compared to other areas of the Borough. The public consultation asked people how they travelled to the site, 75% of users travel to Daisyfield Pools by car and 21% of users either walked or travelled by public transport. Other means of transport used included private coaches and school buses.</p>	<p>Blackburn Leisure Centre is located in Blackburn town centre and is a mile from Daisyfield Pools. If users have not got a car, Blackburn Leisure Centre can be accessed by public transport.</p> <p>We will ensure that public transport links are promoted on our website and that receptionist have the information so can respond effectively to any enquiries asking how to access the centre.</p> <p>There is 16.5 hours of re:fresh swimming sessions available at Blackburn Leisure Centre which cost just £1.00 to access with a re:refresh card. Re:refresh cards are issued free of charge to residents and people who work or are educated in the Borough or are registered with a BwD GP. We will promote the re:refresh card and sessions in the Daisyfield and Bastwell ward.</p>	<p>N/A</p> <p>N/A</p> <p>Officer time</p>	<p>Ryan Scott</p> <p>Ryan Scott</p>	

**MONITORING AND REVIEW**

The responsibility for establishing and maintaining the monitoring arrangements of the EIA action plan lies with the service completing the EIA. These arrangements should be built into the performance management framework.

Monitoring arrangements for the completion of EIAs will be undertaken by the Corporate Equality & Diversity Group and the oversight of the action plans will be undertaken by the Management Accountability Framework.

If applicable, where will the EIA Action Plan be monitored?	<p><i>e.g. via Service Management Team; Service Leadership Team; Programme Area Meetings</i></p> <p>The leisure management team will monitor the pool programme and attendances on a monthly basis at the leisure managers meeting to ensure we are the needs of our customers including those who have transferred from Daisyfield Pools.</p>
How often will the EIA Action Plan be reviewed?	<p><i>e.g. quarterly as part of the MAF process</i></p> <p>Quarterly</p>
When will the EIA be reviewed?	<p><i>It should be reviewed at least every 3 years to meet legislative requirements</i></p> <p>Annually – as part of business planning session</p>
Who is responsible for carrying out this review?	<p>Paul Taylor, Head of Commercial Services</p>

<b>Author Signature</b>	<b>Martin Eden</b>	<b>Date</b>	<b>31/10/2023</b>
<b>Head of Service/Director Signature</b>	<b>Martin Eden</b>	<b>Date</b>	<b>31/10/2023</b>
<i>The above signatures signify acceptance of the ownership of the full EIA, the responsibility for the associated Action Plan (if applicable) and the responsibility to publish the completed full EIA as per the requirements of the Equality Act 2010.</i>			
<b>Departmental E&amp;D Lead Signature</b>	<i>Gwen Kinloch</i>	<b>Date</b>	<b>31/10/2023</b>