

**Executive**

17<sup>th</sup> March 2016

Report of the Deputy Chief Executive / Director of Customer Business Support Services

## **Community Stadium & Leisure Facilities Report**

### **ANNEX C – Equality Impact Assessment Form (updated at February 2016)**

The Equality Act 2010 came into force on the 1<sup>st</sup> October 2010. Under the Act there is a legal obligation to undertake Equality Impact Assessments (EIAs) as stated in the Public Sector Equality Duty. This duty comes into effect on 6 April 2011 and states that as a public organisation we must have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act
- Advance equality of opportunity between people who share a protected characteristic and those who do not
- Foster good relations between people who share a protected characteristic and those who do not

EIAs **assess the impact** of the council's actions on people from the protected characteristics identified in the Act. In addition they should show how our policies and practices would further or have furthered the above aims. Demonstration of the **engagement** you have undertaken when doing the assessment is a key part of this process. Engagement covers a range of different activities, from formal public consultations to direct engagement with people from protected groups. The level of engagement you undertake will depend on the scale of project/activity you are developing or updating.

To comply with the essence of legislation EIAs should be a comprehensive, formal and structured process and the results should be published. These factors enable us to demonstrate to all stakeholders and regulatory / enforcement bodies (like the Equality and Human Rights Commission) that we have fully addressed equality and diversity within the council.

An Equality Impact Assessment must be done at the **development stage** of any policy, review, project, service change etc, **before any decision is taken**.

1	Name and Job Title of person completing assessment	<b>Paul Forrest Community Stadium Project Officer</b>
2	Name of service, policy, function or criteria being assessed	<b>Construction of a new stadium and leisure complex</b>
3	What are the main objectives or aims of the service/policy/function/criteria?	<b>To provide a new home for football and rugby activities as well as community buildings that encourages and supports people to take part in sport and active leisure. Partner offices and a new leisure complex including swimming, sports hall, gym, outdoor all weather pitches, indoor and outdoor climbing and dance studio areas.</b>
4	Date	<b>06/05/11 updated 01/10/14 updated 10/02/2015 updated and including comment from GLL 20/02/2016</b>

### Stage 1: Initial Screening

5	<p>What evidence is available to suggest that the proposed service/policy/function/criteria could have an adverse impact <b>on quality of life outcomes</b><sup>1</sup> for people (both staff and customers) with protected characteristics? Document the source of evidence, (e.g. past experience; anecdotal; research, including national or sectoral; results of engagement/consultation; monitoring data etc) and assess relevance of impact as: Not relevant / Low / Medium / High.</p>			
<b>Protected Characteristic</b>	<b>Impact</b> Not relevant = NR, Low = L, Medium = M, High = H		Source of <b>evidence</b> that there is or is likely to be adverse impact	
	Staff	Customers /Public	Staff	Customers/Public

Race	L	L	Equalities Human rights commission	Equalities Human Rights Commission Consultation with the Equalities advisory Group July 18 <sup>th</sup> 2011
Religion / Spirituality /Belief	L	L		The main sources of information on current and future residents of the district which helped identify the profile of users were the City of York Council Equality Profile 2010. In addition it draws on information from City of York Cultural Awareness guide. Consultation on this strand was carried out in 2009 at the Equality Impact Assessment fair, and 18 <sup>th</sup> July 2011 at the Equalities advisory Group.
Gender	M	M		Draws on information from the Sex discrimination Act 1945 In addition consultation on this strand carried out in 2009 at the Equality Impact assessment fair, and 18 <sup>th</sup> July 2011 at the Equalities advisory groups. Further consultation with sports fans at Bootham Crescent took place in August 2014.

Disability	H	H		<p>Draws information from the Community Stadium Project Design and Access statement, and the Sports England Accessible Sports Facilities document.</p> <p>Alongside these documents was consultation with York Independent Living Network, the Equalities impact Assessment fair 2009 and 18<sup>th</sup> July 2011 Equalities advisory Group.</p> <p>Further consultation was undertaken with an Officer from the Federation of Disability Sport and detailed talks with a disabled representative.</p> <p>Further consultation with sports fans at Bootham Crescent took place in August 2014.</p> <p>Further consultation was undertaken with the Equalities Advisory Group and feedback sought in December 2014.</p>
Sexual Orientation	L	L		<p>Draws on information from Homophobia in Sports</p> <p>Further consultation was undertaken at the Equalities advisory group with a group representative</p>
Age	M	M		<p>Draws on information from 1989 Children's act</p> <p>Collected information from The Equalities Impact Assessment fair 2009 and 18<sup>th</sup> July 2011 Equalities advisory Group.</p> <p>In addition there were consultations with specific groups who identified additional issues to address, such as the City of York Youth Council in September 2011.</p> <p>Further consultation with sports fans at Bootham Crescent took place in August 2014.</p> <p>Further consultation was undertaken with the Equalities Advisory Group and feedback sought in December 2014.</p>

Pregnancy/maternity	M	M		Draws on information from Equality legislation: Equality Act 2010 and the breastfeeding rights.
Gender Reassignment	M	M		It draws on information from Stonewall and Gender shift. Alongside these documents was consultation at the Equalities advisory Group with a group representative
Marriage and Civil Partnership	N R	NR		N/A
Carers of older and disabled people	M	M		Draws on information discussed in the City of York Council Carers strategy 2009-2011 and the Home Government Equalities Office Alongside a consultation on the 18 <sup>th</sup> July Equalities Advisory Group. Further consultation with sports fans at Bootham Crescent took place in August 2014.

If you assess the service/policy/function as **not relevant across ALL the characteristics**, please proceed to section 11.  
If you assess the service/policy/function as **relevant for ANY of the characteristics**, continue to Stage 2, Full Equality Impact Assessment.

## Stage 2: Full Equality Impact Assessment

Are there any concerns that the proposed or reviewed service/policy/function/criteria may be discriminatory, or have an adverse impact on members of the public, customers or staff with protected characteristics? If so record them here (expand the boxes to take up as much room as you need). See the [2 EIA Guidance documents](#) on Colin for help as to what the issues may be.

**Race :**  
**Customers**

The EIA fair 2009 raised the concern that there could be a communication barriers to some communities ; lack of information in different languages- so people don't know enough about what is on offer'. This is especially true when English is not the first language spoken. If alternative languages and format is not provided, it could reduce the accessibility of the facility to certain groups. GLL's leisure guide can be made available to customers in a number of languages.

Measures will be put in to place for all information and signs to be available in alternative languages to make sure the community stadium effectively communicate with all potential users.

Statistics from York Equality profile 2006 identified that there is 9.12 % BME within the York district. The social mix in York illustrates the need for multicultural activities and diversity within the community stadium. Whilst it is not known the diverse users who potentially would use the community stadium, the evidence from equality profile shows the need to acknowledge and accommodate for different users. The community stadium must actively coordinate activities, courses and classes to suit all users of the facility.

A wide and varied programme of use will be on offer at the NSLC making use of all the available facilities. A key focus of the new Community Sports Manager post will be to assess all the needs of the community and ensure that appropriate programmes of activity are in place.

Through the consultation process, an Equalities advisory Group (EAG) representative emphasised the positive impact the Community Stadium could bring to York and the surrounding areas. There are spaces within the proposed Community Stadium building which could potentially be used as religious meeting points.

	<p>Along with a number of meeting rooms, a dedicated Faith Room has also been provided in the Community Hub.</p> <p>An example given at the meeting was the opportunity for proposed spaces in the Community Building to be used for different meeting points.</p>
<p><b><u>Religion</u></b> <b><u>Customers</u></b></p>	<p>Certain times, days and dates may restrict different religions from participating or watching activities at the stadium site. The Community Stadium needs to be aware of the different religions and be sensitive to dates, days and times when arranging and putting on courses, facilities and other activities.</p> <p>The facility will attract visitors from inside and outside York. To accommodate for all users there is a need for a contemplation space within the facility. The provision of a contemplation space has not been identified as a facility however further work may identify that this is necessary.</p> <p>Through consultation numerous concerns were raised over safety. It was acknowledged at the EIA fair in 2009, and raised at the Equalities advisory group that the community stadium needs to be safe, within the facility and on the way to and from the car park.</p> <p>The fears over safety and harassment especially for certain communities could have potentially prevented people using the community stadium. However measures will be put into place to reduce not feeling safe. There will be a car park and bus stop outside the Community stadium. In addition there could be another new bus stop placed on the redirected Kathryn Avenue which will be in closer proximity to the Community Stadium.</p> <p>In addition the 2009 EIA fair raised concern over the different needs of the community to which the community stadium needs to accommodate for. The community stadium will actively incorporate different traditions and beliefs of religions/spirituality. Without this people may feel discriminated against or unwelcome at the new Community stadium.</p>





facility; building, information, and transport. Disabled people are one of the existing Users of Huntington Stadium and facility therefore needs to be a high priority within design and consultation.

The NSLC will be fully accessible and the Leisure Centre will achieve IFI accreditation within the first 18 months of operation.

Part of the community stadium is a hospital outpatient service and wellbeing centre. These will have positive impact on all the strands. Alongside these facilities, it was raised at the EIA fair 2009 the potential amenities that the community stadium had to offer all users, which could have a positive impact; for example there is a potential for hosting 'Disabled sports/Olympics – opportunities locally, nationally, internationally. Disabled Games'.

However during the consultation numerous issues were raised, which need to be addressed to reduce any negative effects. The community stadium project will be a positive impact on disabled users if action is carried out to prevent potential adverse impacts.

During the construction and demolition phase, approx. 18 months, there may be a an adverse impact on certain groups with some disruption to swimming classes and teams due to the demolition of the Waterworld facility. However, CYC officers will work to move all classes to other venues around York and the long term replacement facilities will be of a much higher standard and able to accommodate more classes and programmed swimming classes. In view that there will be a period of time when the Water world will be closed, efforts will be made to advertise alternative facilities in the interim via various methods eg webpage, stadium website, posters in other leisure facilities across the city, leaflets in Waterworld leading up to the closure to alert customers to alternative venues in advance of the closure, discounts at other leisure sites in York to maintain custom in the short term.

## **Design**

A number of responses received commented on issues of design of the facility for example ensuring that the any new facilities were DDA compliant and offered a good visitor experience for disabled people.

Disabled people are reliant on easy movement throughout the stadium. The Equalities Advisory Group raised the concern that without easy movement throughout the stadium, it would discourage disabled people from using the stadium. The main issues raised at the consultation are outlined below;

Some disabled people have difficulties reading information, and signage. Information of leaflets signs and need to be available to all, otherwise they will less likely to be able use the facility.

Alternative formats will be in easy read and Braille format, following the Royal National of Institute of Blind People (RNIB) and City of York Council Guidelines for communications. Whilst the City of York Council will not be managing the stadium after construction, they will carry on working in partnership – to encourage the stadium management to adopt City of York Council guidelines for accessible information.

The Sport England Accessible stadium document together with the Equalities advisory Group Consultation acknowledged that many stadium and leisure are designed with little thought for the different heights to allow everyone to use all the facilities easy – for examples ticket desk and the use of a drop down counter. To ensure easy access, the Community stadium will be designed to the standard height according to RNIB guidelines.

A disability officer expressed concern over the lack of provision for visually impaired and hearing impaired users of other stadiums (Bootham Crescent and Huntington Stadium). The stadium needs to put in hearing loops according to the RNIB guidelines to make sure all disabled users can access the Stadium.

The design and access statement identified the use of different tiers within the stand. Steps and different levelled floors can present challenges to disabled people. There needs to be accessible for everyone by lifts. A group representative stated that fire exits accessible for disabled people will need to be incorporated within the design process.

Many have also expressed concern that minimum requirements will be fulfilled for spectating but not the same level for participating. The facility will be compliant to the Equality Act 2010: All lifts will be accessible, tactile surfaces, low level lighting, the contrasts of colours, design of the doors and entrance will allow for an inclusive stadium.

In addition the consultation raised the issue of design of the stadium, and how facilities in the past have been designed poorly in reference to accessibility. The Equalities Advisory Group consultation stated that the Stadium design need to give full consideration to where seating for disabled people would be in respect to other facilities in the stadium – for example fire exits, lifts and entrances. Facilities need to be placed in close proximity to disability seating to allow easy access.

### **Accessibility**

Disabled people along with other strands are reliant on public transport. An identified risk of the York Independent living centre, as well as other facilities moving from a central location, to further out of town as part of the Community Stadium Project has the potential for an adverse impact on disabled people. Firstly it may be harder for disabled people to get to and from the stadium (same for elderly and women with prams). If facilities were to be based at the stadium it will be important that there was good public transport available. However it was raised at the Equalities advisory group that many buses only allow one wheelchair user at a time, which may cause considerable problems to getting to and from the city centre. This needs to be taken into consideration. It may affect how people are able to get the Independent Living centre, and this may affect the benefits they get.

In addition an Equalities Advisory Group representative was concerned that many sporting opportunities for the public and disabled people are segregated, and as a direct result makes disabled people feel unwelcome. This issue is important to address to give the opportunity for everyone to take part in courses, events and games.

Alongside the consultation, to gain additional issues and concerns there was talks with a group representative of disabled people. The representative stated the facilities which are considered before visiting a facility are the parking facilities and whether their personal assistant get in for free or

at concession. This needs to be considered at both the Community Stadium and perhaps information provided on the facilities at away teams Stadiums.

Whilst outlining all the issues that have been detailed above the representative emphasised the need for adequate transport to and from the Community Stadium. Another issue with transport is the Park and Ride bus stop is a long distance away from the Community Stadium. The proposals have outlined an additional bus stop placed at the entrance to the Community Stadium. However if this does not occur, provision needs to be provided such as benches to support the distance from the Community Stadium to the Park and ride.

In addition the buses in York are not suitable for regular use for people in a wheelchair because of the lack of space within the buses. A suggestion by the representative was a disabled forum which will help the Stadium management assess the potential number of disabled people using the Community Stadium – could include questions of the facilities and provision needed to make it accessible.

There is a need staff/management for example stewards who will monitor and manage the provision of service to disabled guests.

Other suggestions to make the Community Stadium more accessible are having section for blind people with live commentary, TV screens.

Overall the Community stadium should be a positive outcome for all strands; however the issues identified in this section need to be adhered to and focused on to get a positive result during the design stage.

The new leisure and play facilities and community hub will be more accessible than any of the current buildings on site, incorporating hearing loops, easy access to lifts and facilities on all floors, and providing safe calm environments.

Staff:

Hearing loops at the reception desk will be provided along with easy access lifts to all floors.

Overall there should be a high positive impact for disabled people with the new facilities as they are more modern and far more accessible than the current facilities. Specific seating areas, linked to easy access and great vantage points will enable disabled spectators to gain a far better match day experience at the new venue than at the current venues. All current design guides will be used to ensure appropriate design and access and all current criteria are used to design a fully compliant modern facility.

Holmes Miller have incorporated the appropriate number of disabled seating within the stadium design.

Positive impact on disabled people due to the greater access to the workplace and the new buildings and office facilities which can help to increase the employment opportunities available to disabled people.

Increased transport options to and from the Community stadium project will help increase employment opportunities.

Young/disabled people can be prevented from getting to employment opportunities due to inadequate or expensive public transport alternatives. To mitigate new services and increased hours of operation are being considered to improve and increase the sustainable transport service available.

The closure of the current pool and gym facilities may impact employment for some groups. To mitigate this, the operator GLL, will look to redeploy staff in other venues near to York and in the long term offer better employment opportunities once the new and expanded leisure complex is complete.

To help mitigate any negative effect staff will undergo equality awareness training as part of their induction.

**Age:**  
**Customers:**

**Younger People:**

Through the consultation process, including direct engagement with the Youth Council, younger people were given the opportunity to express their views on the Community Stadium Project. In particular, where they were supportive of the project, younger people expressed their views on the types of facilities they would like to see provided, for example a youth area and the opportunity it may bring to the area.

The facility mix at the new Leisure Centre provides a number of facilities for younger people; these include:

- 3 x swimming pools
- 4 court sports hall
- Indoor Adventure Play Zone
- Outdoor High Ropes
- 3 x 3G 5-a-side football pitches
- Junior membership for the gym
- Dance studio

The main issues which were raised by the Youth Council were transport and accessibility. They focused on how they would travel to and from the Community Stadium Site – including cycling, buses and cars. Most responses focused on cycling and the need for bike storage and increase bike racks at the site. Included in this, the Youth Council reported that the cycle paths to and from are good; however increased safety may be needed on these routes with better signage outlining the right of way.

Alongside cycling, another form of transport younger people use regularly are buses. One respondent expressed their concern that buses were both expensive, infrequent and intimidating which resulted in worries about safety and security. They suggested that the Community stadium would need to increase and expand the bus links to the Community Stadium site, and suggested shuttle buses could be a way in which this could be done. The community stadium bus links may have another bus stop being placed outside the Community Stadium on Kathryn Avenue, and bus

links are every 10minutes from the city centre.

Accessibility by public transport is particularly important for younger and older people. The EIA fair 2009 illustrated the concerns of '*travel price and poor transport facilities in the area of York*'. Mobility should not be an issue in the accessibility of the community stadium and its travel links.

Other issues which arose were the access within the Community Stadium, clear and visible signage of information. They suggested Stewards in the Community Stadium on match days to help with the flow of people.

In terms of facilities, the Youth Council were asked to provide any suggestions they had for the community stadium in relation to facilities. Main suggestions were the possibility of a Youth Area, a site for concerts and an Explore library. The provisions of these facilities have not at this stage been identified as facilities to be provided as part of the project but further work may identify these as a possibility and necessary.

There may be a negative impact in the closure of Waterworld and on the teenage market that this caters for. New facilities are planned for the site including extreme play and climbing that would appeal directly to this age group to mitigate this impact. In view that there will be a period of time when the Water world will be closed, efforts will be made to advertise alternative facilities in the interim via various methods eg webpage, stadium website, posters in other leisure facilities across the city, leaflets in Waterworld leading up to the closure to alert customers to alternative venues in advance of the closure, discounts at other leisure sites in York to maintain custom in the short term.

Younger children will benefit positively from the new pools planned and the play features within them which are specifically aimed at under 10's and will host new play features not currently available in York.

The new sports hall will provide viewing and seating to enable indoor competition for many sports to take part all year round and enable spectators of all ages to access live sport in a modern facility.

**Older People:**

Responses were received from representatives of older people on the proposals.

A high concern is the communication barrier and how the Community Stadium will communicate information to the users and also the booking process for use of the facilities. The EIA fair 2009 identified the use of technologies as a worry for many people and the need for ease of online and telephone booking for facilities. Without appropriate and alternative ways of communicating information i.e. telephone, internet, face to face older people (along with other strands) may not be able to access and use the facilities.

A key vision for the NSLC project is the cross use of facilities – eg. customers coming into BE Independent will be made aware of the 50+ programme on offer and the range of specific exercise classes that they could benefit from.

The leisure reception will always be staffed giving customers the option to book and obtain information in a face to face environment. Telephone bookings will also be available.

In addition safety in and around the community stadium is crucial to allow and encourage all age groups to use the facilities.

Overall there should be a high positive impact for older people as the transport links will be greater and the more modern facilities will offer a better range of services and be far more accessible than the current buildings, with new services and activities aimed specifically at older people.

As acknowledged earlier Younger and older people are more likely to rely on public transport to get to and from the circuit which may be infrequent or with alternative expensive options they may be disadvantaged in accessing the facility and employment opportunities. However the Community stadium has regular bus routes going to and from so this impact will be significantly reduced.





<p><b><u>Sexual Orientation</u></b> <b><u>Customers:</u></b></p>	<p>During consultation a group representative raised the concern of homophobia within Sport especially football. There is a potential for the fear of homophobia to adversely affect people participating or watching sporting events. Therefore arrangements must be in place to tackle any issues of homophobia in sport, both in the crowds and viewing galleries and for those participating.</p>
<p><b><u>Carers of Older and Disabled people</u></b> <b><u>Customers:</u></b></p>	<p>By association the carers of older people and disabled people have protected characteristics and there is a concern that the Community stadium may adversely affect these carers. Informed by the City of York Council carers strategy 2009-2011, key concerns are access to services and support particularly in leisure and transport. The community Stadium does have the potential to promote sporting and leisure opportunities to all.</p> <p>Carers will be more than welcome to access the leisure facilities and help support older or disabled people with their exercise / activity.</p> <p>The consultation at the Equalities Advisory Group commented on the price of admission for Carers. During the design stage, this will be discussed and considered.</p> <p>Another issue raised was the lack of seats for Carers to sit next to disabled people or elderly in many Stadiums, especially at the York City Football Club stadium at Bootham Crescent. This has been taken into consideration and Carers of older and disabled people will have the opportunity to sit next to one and another.</p> <p>Overall there should be a high positive effect for carers of older or disabled people as the new facilities will be easier to get to due to increased transport links and the new facilities will be more accessible in design and of a far higher standard than the current facilities. Targeted programmes will also offer specific activities designed for disabled or older people to help them become more active and make greater use of the new leisure complex. Seating and access for disabled people to</p>

<p><u>Staff:</u></p>	<p>the stadium will be of a far higher standard and far more accessible and numerous than at either of the current sports ground, a great improvement on current arrangements with a far better customer experience and specific seating for carers alongside spaces for disabled customers.</p> <p>Key barriers for employment are the need for someone to look after the person they usually care for. This will be looked into and taken into consideration.</p>
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<p>N</p>	<p>Can the adverse impact be justified? For example:</p> <ul style="list-style-type: none"> <li>▪ improving community cohesion</li> <li>▪ complying with other legislation or enforcement duties</li> <li>▪ taking positive action to address imbalances or under-representation</li> <li>▪ Needing to target a particular community or group e.g. older people.</li> </ul> <p><b>NB. Lack of financial resources alone is NOT justification!</b></p>
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No, there should not be an adverse impact which can be justified. The community stadium needs to be a holistic approach which promotes equality and participation of all irrespective of age, gender, disability and pregnancy etc.

<p>8</p>	<p>What changes will you make to the service/policy/function/criteria as result of information in parts 5&amp;6 above?</p>
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Invitation to tender process will mention these risks and will invite developers to address them. Developers will be scored out of 10 ( 10 be it the highest mark) depending on their approach. We shall involve community representatives from EAG when we select a developer.

<p>9</p>	<p>What arrangements will you put in place to <b>monitor impact</b> of the proposed service/policy/function/criteria on individuals from the protected characteristics?</p>
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The project board and then the company board ( stadium management company)

<p>10</p>	<p>List below actions you will take to <b>address any unjustified impact and promote equality of outcome (as in appendix 1)</b> for staff, customers and the public from the protected characteristics. The action could relate to:</p> <ul style="list-style-type: none"> <li>▪ Procedures</li> </ul>
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<ul style="list-style-type: none"> <li>▪ Service delivery</li> <li>▪ Training</li> <li>▪ Improvement projects</li> </ul>		
Action	Lead	When by?
<ul style="list-style-type: none"> <li>• Stadium manager will work with EAG during stages 1 &amp;2 in the commissioning process ( i.e. preparation of business case and pre-tender activities to find workable and reasonable solutions to the issues identified above)</li> <li>• Reasonable adaptations that we shall agree will become part of the contract conditions before we sign the contract.</li> </ul>	<p>Tim Atkins</p> <p>Tim Atkins and Legal Services</p>	<p>December 2011</p> <p>Dec 2011</p>
1 1	Date EIA completed	
Author: Position: Date:		
12	Signed off by	<b>By director</b>
<b>I am satisfied that this service/policy/function has been successfully equality impact assessed.</b>		
Name: Position: Date:		
Once your EIA has been completed we shall also add it to the corporate register of EIAs. We use the register to publish an annual EIA report on the council's site.		