

# Everyone different, everyone matters



## Equality & Community Cohesion Impact Assessment (EIA)

<b>Directorate:</b> Public Services <b>Service Area:</b> Sport	<b>Lead Officer:</b> David Brook <b>Date completed:</b> 29 Nov 2022
<b>Service / Policy / Function or Procedure to be assessed:</b> The future of Calderdale Parks' Tennis Provision	
<b>Is this:</b> New / Proposed <input checked="" type="checkbox"/> Existing/Review <input type="checkbox"/> Changing <input type="checkbox"/> (Please tick appropriate box)	<b>Review date:</b> Nov 2023 (dependent on approval of proposal)

## Part A - Initial Assessment to determine if a full Impact Assessment is required

### What are the aims and objectives/purpose of this service, policy, function or procedure?

To provide a sustainable model that protects Calderdale's tennis courts for the future; to ensure the facilities are affordable and accessible for all residents and to support the Local Authority with activation and programming opportunities to engage local communities.

In October 2021, the Lawn Tennis Association (LTA) announced that over £30 million was to be invested into public park tennis courts across Britain to bring back to life poor or unplayable courts for the benefit of their local communities.

Calderdale has been identified as an area where the LTA believes participation can be increased through a programme which aims to bring existing tennis courts back up to a good playable standard. The Council will be expected to sign up to a long-term agreement, likely to be 10 years, which will detail the terms and conditions of the funding offer and an overview of expectations in terms of the operating model, sustainability plan and the rollout of the LTA tennis programmes delivery.

This equality impact assessment considers the potential impact on protected equality groups should funding be accepted, a future funding model be agreed (see options available below, with recommended option Model 2 Option 1) and charging policy be affected.

**Model 1: Local Authority owns and operates all activities, including court booking and coaching programme**

**Model 2: Local Authority owns court booking opportunities and outsources the provision of a coaching programme**

**Option 1** Outsource to National Operator

**Option 2** Outsource to local tennis club

**Model 3: Local Authority outsources the booking opportunities and the provision of a coaching programme.**

**Option 1** Outsource to National Operator

**Option 2** Outsource to local tennis club

### Please indicate its relevance to equality by selecting yes or no

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment	X	
Advancing equality of opportunity	x	
Fostering good community relations	X	

**If not relevant and this is agreed by your Head of Service**, the Impact Assessment is now complete - please send a copy to your Directorate Equality Champion & to the Cohesion and Equality Team. **If relevant**, a full Impact Assessment needs to be undertaken (PART B below).

## **PART B: Full Impact Assessment**

### **Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)**

<b>What outcomes are sought and for whom?</b>	<p>To:</p> <ul style="list-style-type: none"> <li>• Drive participation and increase use of facilities and provision by all equality strands across park tennis sites</li> <li>• Ensure future sustainability of facilities through minor improvements to facilities and the implementation of an affordable charging policy.</li> <li>• Ensure facilities are accessible to all in terms of cost and facilities as far as is reasonably practicable</li> </ul>
<b>Are there any associated policies, functions, services or procedures?</b>	<p>Calderdale's Playing Pitch Strategy that identifies the need to improve tennis courts</p> <p>CMBC Equality and Diversity Policy Statement</p> <p>Health and Safety Policies and Procedures</p> <p>Procurement and Commissioning Frameworks and Procedures</p>
<b>How will this service be delivered? (e.g. direct service delivery, commissioned/outsourced etc)</b>	<p>The capital works will be procured by the LTA through their framework. The recommendation in the Cabinet report is that the Local Authority will own court bookings and outsource the delivery of the coaching programme via sport services.</p>
<b>If partners (including external partners) are involved in delivering the service, who are they?</b>	<p>As above the LTA are the funder and key partner. If agreed the coaching programme will be outsourced to a yet unknown provider.</p>

### **Step 2 – What does the information you have collected, or that you have available, tell you?**

**What evidence/data already exists about the service and its users?** (in terms of its impact on the 'equality strands', i.e. age, disability, gender identity, race, religion or belief, sex, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

The Playing Pitch Strategy of 2017 identified that there were 94 tennis courts identified across 32 sites. Of these only 54 are available for community use. The general quality of courts on public local authority sites is poor; there are 20 courts deemed unplayable. The majority of private clubs do not offer pay and play. The recommendations included for us to consider quality over quantity, particularly on local authority sites and explore options to provide a hub site approach to provision while improving court quality where possible.

National research shows that there are many areas of the country where park courts remain dilapidated and unappealing with 45% of park courts categorised as being in a poor or unplayable condition. Critically, half of these are in the most socially deprived areas of the country

The Council currently has 8 sites that currently provide 20 tennis courts for the public to play on year-round. These are located at:

Centre Vale Park

Crow Wood Park

Holmefield Recreation Ground

Millfold Recreation Ground

Mixenden Park

Shelf Hall Park

Northowram Recreation Ground

Wellholme Park

#### **Introduction of fees for Tennis and Charging Mechanism**

At present, most Council managed courts in Calderdale are free to use and are not gate access controlled. The courts at Brighouse Leisure Centre and in Centre Vale Park are free for our Active Lifestyles Members, but there is a charge of £6.70 at Centre Vale and £6.40 at Brighouse. Northowram Tennis Club have a long term lease for the tennis courts and have their own pricing/membership packages.

The sustainable charging mechanism will need to be flexible with all sites having times where free play is available with a proposed standard charge for pay and play of £5 per session and season tickets (that can be used at all sites) charged at £30 per annum to achieve the agreed income target. The proposed charging mechanism assumes that Mixenden Park will be free to use, although booking will still be required.

Case Studies from Burnley evidences that Gate Access enhances participation levels and the customer experience for residents, and provides access for more players, which has contributed to Burnley health and well-being objectives. It also shows that affordable pricing is not a barrier and helps to raise court quality in a sustainable way.

Operating models from Nottingham City Council, Doncaster Council, Manchester City Council, Salford City Council, Burnley Council, Bury Council, Sheffield City Council and Rotherham Council have informed the proposed local approach as below.

**Model 1: Local Authority owns and operates all activities, including court booking and coaching programme**

Nottingham City Council were operating their parks in line with this model but have decided to look at outsourcing to a third party once their parks are upgraded next year. Doncaster Council are exploring how this model may work for them.

**Model 2: Local Authority owns court booking opportunities and outsources the provision of a coaching programme**

**Option 1** Outsource to National Operator

**Option 2** Outsource to local tennis club

We do Tennis (WDT) a national operator have expressed an interest in working with Calderdale Council in line with the recommended Model 2 Option 1 proposal. This model is in place in Manchester with Manchester Active managing bookings and working with We Do Tennis who deliver the coaching. A similar model is being discussed with Salford City Council where Salford Community Leisure will manage bookings and WDT will deliver coaching. <https://clubspark.lta.org.uk/mcrparkstennis>.

This is also the proposed model in Burnley where the Local Authority will manage the court bookings and work with Burnley Leisure to outsource the coaching to a local tennis club.

**Model 3: Local Authority outsources the booking opportunities and the provision of a coaching programme.**

**Option 1** Outsource to National Operator

**Option 2** Outsource to local tennis club

Model 3 is in place in Bury who have just confirmed an initial 12 month pilot across their 11 park sites with WDT .

<https://clubspark.lta.org.uk/Bury> . This model is also in place in Sheffield and Rotherham with Premier Tennis, one of the LTA's other national operators.

The LTA would recommend a formal tender process and consultation with other operators and clubs in Calderdale to ensure the best fit for the opportunity is secured.

**Has there been any consultation with, or input from, service users, staff or other stakeholders?** If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

The Lawn Tennis Association are the key stakeholder that have been driving this project with us. They have researched the current standards of Calderdale courts and made recommendations in line with IMD insight.

Following assessments of the tennis courts by LTA, they are proposing to invest in 6 of our 8 existing courts, with the other 2 being assessed as good quality courts already. LTA are proposing the following works in each location:

Centre Vale Park – resurface, nets and posts, lite gate entry system

Crow Wood Park – rebind and paint, fencing, nets and posts, lite gate entry system  
Holmfield Recreation Ground – rebind and paint, fencing, nets and posts, lite gate entry system  
Millfold Recreation Ground – Access gate system  
Mixenden Park – resurface, fencing, nets and posts and lite gate entry system  
Shelf Hall Park – resurface, fencing, nets and posts and lite gate entry system  
Funding will only be granted on the condition that the Council agrees to a sustainable operating model with gate access in place. The operating model will include tennis programme delivery, be it internally or through an external agency/organisation, delivering a number of LTA participation programmes. This is so that upgraded courts see a real growth in usage and local authorities can continue to invest in their courts over the long term.

**Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?**

As above

### **tep 3 – Identifying the impact**

#### **a. Is there any impact on individuals or groups in the community?**

(think about age, disability, gender identity, race, religion or belief, sex, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups)

#### Barriers:

The main barrier to all the equality strands is that the courts either aren't available, bookable or of poor quality.

Other than the weather, places to play (45%) is the main barrier to taking part more often.

A well as places to play, lack of support for affordable people to play in the form of coaching and community initiatives is a barrier amongst equality groups.

In relation to potential consideration of outsourcing of coaching provision to local tennis clubs, club members may wish to restrict access to membership holders only

#### Solutions:

This program is both capital and revenue and therefore will improve the standard of local authority tennis courts in high IMD areas. It will also provide a sustainable coaching programme to encourage and support more participation from individual groups. Should coaching be outsourced to local tennis clubs, the Council will ensure access is not restricted to club membership only.

	<b>Barriers/Impacts identified</b>	<b>Solutions (ways in which you could mitigate the impact)</b>
<b>Age</b> (including children, young people and older people)	<p>Some service provision may have restricted age access i.e. junior tennis sessions.</p> <p>Availability, cost and potentially low take up of provision by older people who may perceive that tennis isn't accessible to them.</p>	<p>The sustainable charging mechanism will be flexible with all sites having times where free play is available</p> <p>Communications and marketing campaigns will include inclusive design, imagery and positive messaging to promote tennis as a sport for all</p>
<b>Disability</b> (including carers)	<p>Availability, cost and accessibility . challenges may limit access to provision.</p> <p>Facilities are wheelchair accessible however as tennis is physical sport, some disabled people may not be able to take part in the same way as non-disabled people.</p>	<p>The sustainable charging mechanism will need to be flexible with all sites having times where free play is available</p> <p>Communications and marketing campaigns will include inclusive design, imagery and positive messaging to promote tennis as a sport for all</p> <p>Reasonable adjustments will be considered and implemented wherever possible. This will be identified as an outcome within the procurement of the outsourced coaching. Targeted accessible tennis will be explored with Calderdale's Disability Sports Development Officer and partners.</p>
<b>Race</b> (including Gypsies & Travellers and Asylum Seekers)	<p>Availability, cost (specifically in relation asylum seekers) and potentially low take up of provision by</p>	<p>The sustainable charging mechanism will be flexible with all sites having times where free play is available</p>

	<p>some ethnic groups who may perceive that tennis isn't accessible to them</p> <p>Some minority ethnic women may not be confident to use opposite sex coaching provision</p>	<p>Communications and marketing campaigns will include inclusive design, imagery and positive messaging to promote tennis as a sport for all</p> <p>Consideration of some single sex coaching provision being made available/commissioned</p>
<b>Religion or Belief</b> (including people of no religion or belief)	<p>Potentially low take up of provision by some faith groups who may perceive that tennis isn't accessible to them</p> <p>Some women of faith may not be confident to use opposite sex coaching provision</p>	<p>Communications and marketing campaigns will include inclusive design, imagery and positive messaging to promote tennis as a sport for all</p> <p>Consideration of some single sex coaching provision being made available/commissioned</p>
<b>Gender Re-assignment</b> (those that are going through transition: male to female or female to male)	The Equality Act 2010 sets out exceptions which include restricting participation of a transsexual person in a sport, game, or competitive activity but only if this is necessary in a particular case to secure fair competition or for the safety of other competitors	Ensure related management responses to complaints and concerns relating to competitive sport are handled sensitively and guided by legal opinion
<b>Pregnancy and Maternity</b>	No adverse impact identified at this time	
<b>Sex</b> (either male or female and including impact on men and women)	The Equality Act 2010 sets out an exception to provisions for men and women that may apply in relation to a competitive sport, game, or other activity, where physical strength, stamina, or physique are significant factors in determining success or failure. In such cases, the Act permits separate events to be organised for men and for women, this may be viewed as positive or negative	Ensure related management responses to complaints and concerns relating to competitive sport are handled sensitively and guided by legal opinion



	by individuals dependent on the views of individuals.  Some women may not be confident to use opposite sex coaching provision	Consideration of some single sex coaching provision being made available/commissioned
<b>Sexual orientation</b> (including gay, lesbian, bisexual and heterosexual)	No adverse impact identified at this time	

**b. Is there/will there be any impact on staff?**

(think about the diversity of the workforce delivering the service and relevant training and development needs)

<b>Employee Characteristic</b>	<b>Barriers/Impacts identified</b>	<b>Solutions (ways in which you could mitigate the impact)</b>
<b>Age</b>	No adverse impact identified at this time	Management support and access to relevant training will be put in place for staff implementing and administrating the proposed change.
<b>Disability</b>		
<b>Gender reassignment</b>		
<b>Pregnancy &amp; Maternity</b>		
<b>Marriage and Civil Partnership</b>		
<b>Race</b>		
<b>Religion or Belief</b>		
<b>Sex</b>		
<b>Sexual Orientation</b>		

## **Step 4 – Changes or mitigating actions proposed or adopted**

**Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure? What changes or mitigating actions are proposed?**

We will need to ensure that the sustainable charging mechanism is flexible with all sites having times where free play is available. We will review the demographic information of users to ensure equality groups are accessing the provision, where gaps are identified we will work with community groups and relevant stakeholders to support wider participation

## **Step 5 – Monitoring**

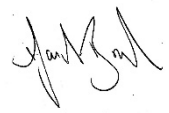
**How are you going to monitor the existing service, policy, function or procedure?**

Quarterly and annual monitoring of bookings and income. Monitoring of the outsourced coaching provision to ensure equality groups are engaged.

## Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale
Cost	Ensure that the sustainable charging mechanism is flexible with all sites having times where free play is available.	David Brook	On commencement of project
Accessibility	Marketing of new courts and associated coaching programme when operational.  Consideration of single sex coaching provision being made available/commissioned	David Brook	On commencement of project
Community perception may self-limit access to provision	Develop inclusive communications and marketing campaigns	David Brook	On commencement of project

### EIA approved by:

 Relevant Head of Service:	Date: 1/12/22
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**Please send an electronic copy of the EIA to the Cohesion and Equality Team and unless the EIA contains sensitive or confidential information ensure the document is uploaded to the EIA Register on the Intranet.**

**A brief summary of the EIA will be placed on the Council's website.**

[Shameem.Suleman@calderdale.gov.uk](mailto:Shameem.Suleman@calderdale.gov.uk), Cohesion and Equality Team