

Equality impact assessment form

Directorate: Communities and Place

Service area: Allestree Golf Course

Name of policy, strategy, review or function being assessed: Potential closure of Allestree Golf Course

Date of assessment: January 2020

Name of Director/Head of Service signing it off

Decision of Cabinet, Personnel Committee or Chief Officer Group

Date published on website

January 2019



Derby City Council



Equality impact assessment – please read this section first before you do the assessment

This is our equality impact assessment form to help you equality check what you are doing when you are about to produce a new policy, review an older one, write a strategy or plan or review your services and functions. In fact you need to do an equality impact assessment whenever a decision is needed that affects people and **before** that decision is made.

So why do we need to do equality impact assessments? Although the law does not require us to do them now, the courts still place significant weight on the existence of some form of documentary evidence of compliance with the **Public Sector Equality Duty** when determining judicial review cases. This method helps us to make our decisions fairly, taking into account any equality implications, so yes we still need to do them.

The Public Sector Equality Duty is part of the Equality Act 2010 and this Duty requires us as a public body to have '**due regard**' to eliminating discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act. It requires us to advance equality of opportunity and foster good relations between people who share a '**relevant protected characteristic**' and people who don't.

Having 'due regard' means:

- removing or minimising disadvantages suffered by people due to their protected characteristics
- taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people
- Encouraging people with certain protected characteristics to participate in public life or in other activities where the participation is disproportionately low.

The protected characteristics are:

- age
- disability
- gender identity
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

This completed form should be attached to any Chief Officer Group, Cabinet or Personnel Committee report to help elected members make their decisions by taking the equality implications into account. Equality impact assessments **must be done before** decisions are made. Include the Cabinet or Personnel Committee's decision on the front sheet when you know it.

You'll find that doing these assessments will help you to:

- understand your customers' and communities needs
- develop service improvements
- improve service satisfaction
- demonstrate that you have been fair and open and considered equality when working on re-structuring
- Make sure you pay due regard to the requirements of the Public Sector Equality Duty.

Don't do the form by yourself, get a small team together and make sure you include key people in the team such as representatives from our Diversity Forums and employee networks and you could invite trade union representatives too – the more knowledge around the table the better. You also need to decide how and who you will consult with to help inform the equality impact assessment. Our Lead on Equality and Diversity can help with useful contacts – we have a team of people who are used to doing these assessments and can help with information on barriers facing particular groups and remedies to overcome these barriers.

You'll need to pull together all the information you can about how what you are assessing affects different groups of people and then examine this information to check whether some people will be negatively or positively affected. Then you'll need to look at ways of lessening any negative effects or making the service more accessible – this is where your assessment team is very useful and you can also use the wider community. Against every negative impact you will need to complete the mitigation section to explain how you will lessen the impact.

Agree an equality action plan with your assessment team, setting targets for dealing with any negative effects or gaps in information you may have found. Set up a way of monitoring these actions to make sure they are done and include them in your service business plans.

When you have completed the assessment, get it signed by your Head of Service or Service Director and **send it to our Lead on Equality and Diversity for checking and to publish on our website**. It is a public document so must not contain any jargon and be easy to understand.

Remember, we need to do these assessments as part of our everyday business, so we get our equality responsibilities right and stay within the law – Equality Act 2010.

Equality groups and protected characteristics

These are the equality groups of people we need to think about when we are doing equality impact assessments and these people can be our customers or our employees and job applicants...

- Age equality – the effects on younger and older people
- Disability equality – the effects on the whole range of disabled people, including Deaf people, hearing impaired people, visually impaired people, people with mental health issues, people with learning difficulties, people living with autism and people with physical impairments
- Gender identity – the effects on trans people
- Marriage and civil partnership equality
- Pregnancy and maternity equality - women who are pregnant or who have recently had a baby, including breast feeding mothers
- Race equality – the effects on minority ethnic communities, including newer communities, Gypsies and Travellers and the Roma community
- Religion and belief or non-belief equality – the effects on religious and cultural communities, customers and employees
- Sex equality – the effects on both men and women and boys and girls
- Sexual Orientation equality – the effects on lesbians, gay men and bisexual people

Contact for help

Ann Webster – Lead on Equality and Diversity

ann.webster@derby.gov.uk

Tel 01332 643722 Minicom 01332 640666 Mobile 07812301144

The form

We use the term ‘policy’ as shorthand on this form for the full range of policies, practices, plans, reviews, activities and procedures.

Policies will usually fall into three main categories...

- Organisational policies and functions, such as recruitment, complaints procedures, re-structures
- Key decisions such as allocating funding to voluntary organisations, budget setting
- Policies that set criteria or guidelines for others to use, such as criteria about school admissions, procurement methods, disabled facilities grants, on street parking bays

If in doubt – it’s better and safer to do an Equality Impact Assessment than not to bother! You never know when we may get a legal challenge and someone applies for Judicial Review.

What’s the name of the policy you are assessing?

The proposed closure of Allestree Park Golf Course

The assessment team

Team leader’s name and job title –

Richard Hemstock, Outdoor Sports Team Leader

Other team members

Name	Job title	Organisation	Area of expertise
Duncan Cowie	Head of Service	Derby City Council	Council Plan
Clive Barker	Vice Chairman	Allestree Park Golf Club	Member of Golf Club

Name	Job title	Organisation	Area of expertise
Mick Finn	Club Committee member	Allestree Park Golf Club	Member of Club
Pam Thompson		Derby City Council	Equality and diversity
Howard Birchall		Access Equality and Inclusion Hub	Visual impairment
Som Bhalla		Access Equality and Inclusion Hub	Race equality and older people's equality issues

Step 1 – setting the scene

Make sure you have clear aims and objectives on what you are impact assessing – this way you keep to the purpose of the assessment and are less likely to get side tracked.

- 1 What are the main aims, objectives and purpose of the policy? How does it fit in with the wider aims of the Council and wider Derby Plan? Include here any links to the Council Plan, Derby Plan or your Directorate Service Plan.**

The Council's Cabinet met on 11 September 2019 and approved a report in connection with the Disposal of Allestree Hall and future operation of Allestree Park golf course. The report set out that a preferred bidder had been identified for the purchaser of Allestree Hall and the implications for the future operation of the golf course. It was decided:

- To dispose of Allestree Hall to the proposed bidder.
- To consult with relevant stakeholders on the potential closure of the golf course.
- To provide an opportunity for third party organisations to make viable business proposals which offer a sustainable future for the golf course by way of an Expression of Interest (Eoi) exercise.

The full report can be viewed via the following link:

<https://cmis.derby.gov.uk/CMIS5/Document.ashx?czJKcaeAi5tUFL1DTL2UE4zNRBcoShgo=WlaD%2bHZwjYOnEdMA8XswB4mePIsWwRsZP5IGiNov7tMRoBEpil6iJQ%3d%3d&rUzwRPf%2bZ3zd4E7lkn8Lyw%3d%3d=pwRE6AGJFLDNih225F5QMaQWCtPHwdhUfCZ%2fLUQzgA2uL5jNRG4jdQ%3d%3d&mCTIbCubSFfXsDGW9IXnlq%3d%3d=hFflUdN3100%3d&kCx1AnS9%2fpWZQ40DXFvdEw%3d%3d=hFflUdN3100%3d&uJovDxwdjMPoYv%2bAJvYtyA%3d%3d=ctNJFf55vVA%3d&FgPIIEJYlotS%2bYGoBi5oIA%3d%3d=NHdURQburHA%3d&d9Qjj0ag1Pd993jsyOJqFvmyB7X0CSQK=ctNJFf55vVA%3d&WGewmoAfeNR9xqBux0r1Q8Za60lavYmz=ctNJFf55vVA%3d&WGewmoAfeNQ16B2MHuCpMRKZMwaG1PaO=ctNJFf55vVA%3d>

The main aim of the Council's consultation and the implementation of the report to Cabinet is to ascertain the impact of the potential closing of Allestree Park Golf Course, the only remaining Council-operated course in Derby City, on the users who fall under the protected characteristics of the equality Act. The Council also owns Sinfin Golf Course which is part-way through a 15-year Lease to Sheffield City Trust which commenced in 2015.

The closing of the golf course would offer an annual revenue cost saving to the Council of an estimated £69,000 and assumes that the course would be maintained as park-land should it cease to provide a golf course.

2 Who delivers/will deliver the policy, including any consultation on it and any outside organisations who deliver under procurement arrangements?

Cabinet has allocated delegated authority to the Council's Strategic Director of Corporate Resources and the Strategic Director of Communities and Place in consultation with the Cabinet Member for Governance and Licensing and the Cabinet Member for Leisure, Culture & Tourism to:

- Agree terms for the disposal of Allestree Hall.
- Undertake consultation on the proposals for the future operation of the golf course.
- Undertake the Expression of Interest Exercise for the golf course.
- Agree and approve the criteria for assessing the viability of any submitted business proposal which offers a sustainable future for the operation of the golf course.
- Determine whether a viable proposal has been submitted.
- Agree the closure of Allestree Park golf course if no viable business proposals are submitted.

The Council's formal consultation is being led the Council's Consultation, Estates and Parks teams.

Both the consultation and an Eol exercise in respect of Allestree Golf course was launched on 16 December 2019 on the Council's Website. The closing date for both is 12 noon on 23 March 2020. For the further details of the consultation and Eol, the link to the relevant page on the website follows:

<https://www.derby.gov.uk/council-and-democracy/consultations/your-city-your-say-latest-consultations/allestree-golf-course-consult/> and the **live link** to the consultation survey is [here](#).

Paper copies of the consultation document are available at both the Golf Course office at Allestree Park and at Allestree Library.

Media and marketing support is also being provided by the Council's communications team to ensure that awareness of the consultation is promoted. For example, the Council's Newsroom has featured an article to promote the consultation and Eol process; see below for a link.

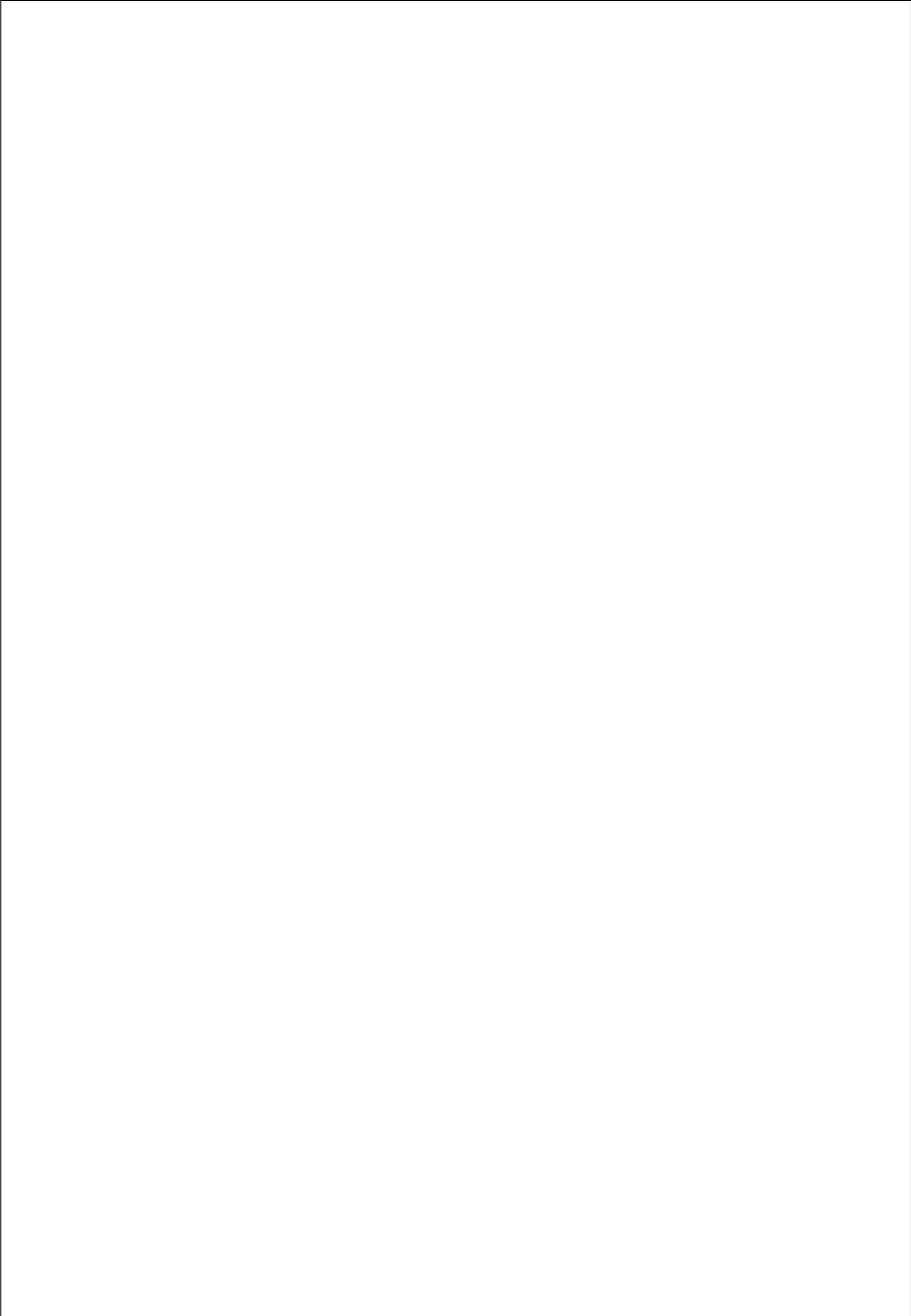
<https://news.derby.gov.uk/allestree-golf-course-consultation/>

The Eol opportunity has also been promoted nationally via the Leisure Opportunities digital magazine tenders section.

3 Who are the main customers, users, partners, employees or groups affected by this proposal?

The main customers and groups who will be affected by this decision are:

- Over 16,000 rounds played at Allestree in the year 2018/19. Made up of pay and play, season Tickets and online bookings
- Golfers who play regularly at Allestree Park Golf Course. This group ranges from regular to occasional/infrequent golfers; the regular players includes around 140 season ticket holders who pay an annual price to play golf for 12 months.
- Season ticket holders of Allestree Park are made up of the following groups: (Data Source of 128. 4 people did not put down their Date of Birth on the form)
 - 6.2% identify as Female
 - 15% are under the age of 50 years old
 - 20% are between 50 and 60 years old
 - 65% are over 60
- People who have used promotions at Allestree Park Golf Course where we have collected data are: (data Source of 88 People)
 - 17% Identified as Female
 - 52% were under 50 years old
 - 16% were between 50 and 60
 - 32% were over 60
- Potential customers who might be looking to take up the sport of golf as Allestree Park Golf Course is an accessible course to all in terms of it being “pay and play” i.e. membership is not being required.
- The 6.6 full-time equivalent (FTE) staff based at the golf course are affected by the potential closure of the golf course as they would be at risk of redundancy if it is decided that the course would close.
- Allestree Park Golf Course also supports a private business of a clubhouse which provides drinks and snacks for all people who use the park.



- The clubhouse is not exclusive to golfers and has always had an open door policy
- Allestree Park Golf club will also be affected by the closure as they will have to disband and a vital lifeline for some of the older members (40 years + of membership to the club) will be removed from them.

These include many vulnerable older people where the club offers them companionship and a weekly meet and great with long standing friends.

Step 2 – collecting information and assessing impact

- 4 Who have you consulted and engaged with so far about this policy, and what did they tell you? Who else do you plan to consult with? – tell us here how you did this consultation and how you made it accessible for the equality groups, such as accessible locations, interpreters and translations, accessible documents.**

The authority has started a public consultation which is accessible online and via paper copies that can be found in the golf shop at Allestree Park, at Allestree Library and from the Council House reception.

The consultation was launched on 16 December 2019 and closed on 23 March 2020.

Social media - Twitter and Facebook – has been used to inform those who follow Allestree Park golf course feeds to let people know that a consultation is taking place and a link to access the consultation has been provided.

Allestree Park Golf Club officials have been kept informed and have had access to the consultation online and the paper copies.

Spoke to Disability and Equality hub to participate in the Equality Impact Assessment.

Results of consultation:

The consultation was primarily conducted through an online survey with paper versions available at Allestree Golf Course, Allestree Library and The Council House. Different versions and translations were available on request. People were also given the opportunity to write in with any other comments they had.

805 people in total completed the survey, this was made up of:

- 763 people gave their view through the online survey
- 42 people completed a paper questionnaire.

Key findings:

- Three quarters of consultees (75%) believed that it was important to the local area that Allestree continued to have a golf course
- Most people responding to the survey (80.2%) did not mind if it was the Council or other organisations that operated Allestree Golf Course as long as it is of a good standard
- 246 participants commented that the golf course should be kept
- 96 people commented that the golf course should be removed and returned to parkland

Who took part in the consultation?

Gender

- Male 75.9%
- Female 24.1%
- 0.4% of respondents' gender was different to that assigned at birth

Age

- Under 18: 0.1%
- 18-25: 1.6%
- 26-45: 28.2%
- 46-65: 48.3%
- 66-85: 21.7%
- Over 85: 0.1%

Do you consider yourself to be disabled?

- Yes: 5.4%
- No: 94.6%

Ethnicity

	%
Asian or Asian British - Indian	0.5
Asian or Asian British - Pakistani	0.1
Black or Black British - African	0.3
Black or Black British - Caribbean	0.3
Dual Heritage - White and Black Caribbean	0.1
Dual Heritage - White and Asian	0.3
Any other Dual Heritage background	6.6
White - English / Welsh / Scottish / Northern Irish / British	83.5
White - Irish	1.2
White - Gypsy or Irish Traveller	0.4
Any other White background	5.5
Any other ethnic group	1.2
Total	100.0

Sexuality

Heterosexual / straight: 89.6%

Bisexual: 1%

A gay man: 0.8%

A gay woman / lesbian: 0.1%

Other: 0.4%

Prefer not to say: 8.1%

Religious beliefs

Yes: 31.6%

No: 53.2%

Prefer not to say: 15.2%

If yes, which religion?

Christian: 50.0%

Other: 15.6%

Prefer not to say: 34.4%

- 5 Using the skills and knowledge in your assessment team, and from any consultation you have done, what do you already know about the equality impact of the policy on particular groups? Also, use any other information you know about such as any customer feedback, surveys, national research or data. Indicate by a tick for each protected characteristic group whether this is a negative or a positive impact. If it's negative, fill in the mitigation section as well to explain how you are going to lessen the impact.**

Age

What do you already know?	Positive impact	Negative impact	Mitigation
72 of our 130 season ticket holders are over the age of 65. This is the		X	Offer suitable alternatives for exercise

What do you already know?	Positive impact	Negative impact	Mitigation
only exercise that many of them do twice a week			
Lack of Social interaction between older players who will not be able to access other social activities this could lead to loneliness and a lack of social network, which could lead to an impact on NHS/Social worker.		x	Promoting other services within the area. Other health providers who could offer alternative methods of exercise Allestree park will still be accessible for people to use.
Access to golf for beginners particularly younger people will be impacted due to higher costs elsewhere		x	Look at other service providers who could accommodate.

Disability

What do you already know?	Positive impact	Negative impact	Mitigation
We have a few players who are disabled people who play at Allestree.		x	Allestree park will still be accessible for people to use
Some visually impaired users of Allestree park would be safer walking around Allestree park if the course was closed Not having to negotiate flying golf balls	x		

Gender identity- trans

What do you already know?	Positive impact	Negative impact	Mitigation
As we are a council operated course, we abide by the equality laws and our own	x		

What do you already know?	Positive impact	Negative impact	Mitigation
<p>Equality, Dignity and Respect Policy.</p> <p>Therefore, no person will be discriminated against on grounds of gender identity. Allestree park will still be accessible for people to use</p>			

Marriage and Civil Partnership

What do you already know?	Positive impact	Negative impact	Mitigation
We have no data on this			Allestree park will still be accessible for people to use

Pregnancy and maternity

What do you already know?	Positive impact	Negative impact	Mitigation
We have no data on this			Allestree park will still be accessible for people to use

Race

What do you already know?	Positive impact	Negative impact	Mitigation
Ethnicity details included above			Allestree park will still be accessible for people to use

Religion or belief or none

What do you already know?	Positive impact	Negative impact	Mitigation
Details of religious beliefs included above			Allestree park will still be accessible for people to use

Sex

What do you already know?	Positive impact	Negative impact	Mitigation
The use of Allestree Golf Course is generally male dominated, however, we do have a regular number of women present. Season tickets held by women is at just over 6%		x	Allestree park will still be accessible for people to use

Sexual orientation

What do you already know?	Positive impact	Negative impact	Mitigation
Sexuality details included above			Allestree park will still be accessible for people to use

Important - For any of the equality groups you don't have any information about, then make it an equality action at the end of this assessment to find out. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. You can get lots of information on reports done from organisations' websites such as the Equality and Human Rights Commission, Stonewall, Press for Change, Joseph Rowntree Trust and so on. Please don't put down that the impact affects 'everyone the same' – it never does!

- 6 From the information you have collected, how are you going to lessen any negative impact on any of the equality groups? How are you going to fill any gaps in information you have discovered?**

With a large array of possible alternatives for customers to go to within a short drive of Allestree Park any player who plays here regularly will be able to play golf if they wish to continue. However, there are a number of issues with this including higher cost and also access.

Allestree Golf Course fills the bottom of the market in comparison to other courses locally; as it is the cheapest option for those who are on low incomes/pensions. Therefore the course provides a gateway to the sport that other clubs locally cannot provide. The course has no dress code, which at private clubs can be a barrier, therefore anyone can turn up to play.

Contact Ian Robson from the Derby LGBT organisations to highlight the consultation and also to try to get feedback in regard to Sexual orientation and Gender identity.

Step 3 – deciding on the outcome

7 What outcome does this assessment suggest you take? – You might find more than one applies. Please also tell us why you have come to this decision?

Outcome 1	No major change needed – the EIA hasn't identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken
Outcome 2	Adjust the policy to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?
Outcome 3	Continue the policy despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are: <ul style="list-style-type: none"> • sufficient plans to stop or minimise the negative impact • mitigating actions for any remaining negative impacts • Plans to monitor the actual impact.
Outcome 4	Stop and rethink the policy when the EIA shows actual or potential unlawful discrimination

Our Assessment team has agreed Outcome number(s)

Outcome 3

Why did you come to this decision?

Due to the decision not showing potential unlawful discrimination.

The policy has negatives affects, as well as the policy unlikely to be altered or changed. Unless someone comes forward in the Expression of Interest opportunity.

Left us with no other decision other than 3.

We hope the Council will work hard with anyone who wishes to put an expression of Interest to keep the golf course open.

If you have decided on **Outcome 3**, then please tell us here the justification for continuing with the policy. You also need to make sure that there are actions in the Equality Action Plan to lessen the effect of the negative impact. This is really important and may face a legal challenge in the future.

If you have decided on **Outcome 4** then if the proposal continues, without any mitigating actions, it may be likely that we will face a legal challenge and possibly a Judicial Review on the process - it is really important that the equality impact assessment is done thoroughly, as this is what the Judge will consider.

Step 4 – equality action plan – setting targets and monitoring

8 Fill in this table with the equality actions you have come up with during the assessment. Indicate how you plan to monitor the equality impact of the proposals, once they have been implemented.

Equality Action Plan –setting targets and monitoring

Age

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Offer advice and guidance to all players on where they can continue their golfing	Some may move to another course to continue	September 2020 led by Richard Hemstock	Email sent out to all players who we have contact with
Look at local provision for health and fitness that may help people continue to keep fit	Move some players into other activity	September 2020 Richard Hemstock	Email sent out to all players who we have contact with

Disability

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
No actions			

Gender identity - Trans

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Contact Derbyshire LGBT+ group and ask them to participate in the consultation	Will be able to get further information from a client group who have not been consulted on the issue	Email sent 27/2/2020 to Derbyshire LGBT+ or asking them to circulate to all members	Feedback from Consultation returns

Marriage and Civil Partnership

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
No actions			

Pregnancy and maternity

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
No actions			

Race

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
No actions			

Religion or belief or none

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
No actions			

Sex

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
No actions			

Sexual orientation

What are we going to do to advance equality	What difference will it make	When will we do it and who will lead	Monitoring arrangements
Contact Derbyshire LGBT+ group and ask them to participate in the consultation	Will be able to get further information from a client group who have not been consulted on the issue	Email sent 27/2/2020 to Derbyshire LGBT+ or asking them to circulate to all members Richard Hemstock	Feedback from Consultation returns

We can give you this information in any other way, style or language that will help you access it. Please contact us on: 01332 Minicom: 01332 640666

Polish

Aby ułatwić Państwu dostęp do tych informacji, możemy je Państwu przekazać w innym formacie, stylu lub języku.

Prosimy o kontakt:

Tel. tekstowy: 01332 640666

Punjabi

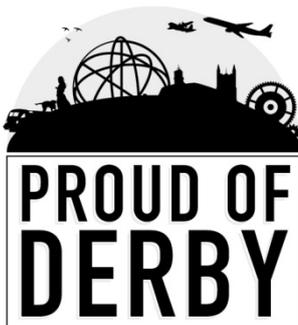
ਇਹ ਜਾਣਕਾਰੀ ਅਸੀਂ ਤੁਹਾਨੂੰ ਕਿਸੇ ਵੀ ਹੋਰ ਤਰੀਕੇ ਨਾਲ, ਕਿਸੇ ਵੀ ਹੋਰ ਰੂਪ ਜਾਂ ਬੋਲੀ ਵਿੱਚ ਦੇ ਸਕਦੇ ਹਾਂ, ਜਿਹੜੀ ਇਸ ਤੱਕ ਪਹੁੰਚ ਕਰਨ ਵਿੱਚ ਤੁਹਾਡੀ ਸਹਾਇਤਾ ਕਰ ਸਕਦੀ ਹੋਵੇ। ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ ਟੈਲੀਫੋਨ ਮਿਨੀਕਮ 01332 640666 ਤੇ ਸੰਪਰਕ ਕਰੋ।

Slovakian

Túto informáciu vám môžeme poskytnúť iným spôsobom, štýlom alebo v inom jazyku, ktorý vám pomôže k jej sprístupneniu. Skontaktujte nás prosím na tel.č: Minicom 01332 640666

Urdu

یہ معلومات ہم آپ کو کسی دیگر ایسے طریقے، انداز اور زبان میں مہیا کر سکتے ہیں جو اس تک رسائی میں آپ کی مدد کرے۔ براہ کرم منی کام 01332 640666 پر ہم سے رابطہ کریں۔



Derby City Council