



## Equality Impact Assessment: The Closure of Northbrook Swimming Pool

The Equality Act 2010 includes a general duty which requires public authorities, in the exercise of their functions, to have due regard to the need to:

- **Eliminate discrimination**, harassment and victimisation and any other conduct that is prohibited by or under the Act.
- **Advance equality of opportunity** between people who share a relevant protected characteristic and people who do not share it.
- **Foster good relations** between people who share a relevant protected characteristic and those who do not

In order to comply with the general duty authorities must assess the impact on equality of decisions, policies and practices. These duties do not prevent the authority from reducing services where necessary, but they offer a way of developing proposals that consider the impacts on all members of the community.

Authorities which fail to carry out equality impact assessments risk making poor and unfair decisions which may discriminate against particular groups and worsen inequality.

Committee name and date:	Report Title	Decisions being recommended:	People with protected characteristics potentially impacted by the decisions to be made:
24 <sup>th</sup> June 2025	The Closure of Northbrook Swimming Pool	To close Northbrook Swimming Pool	Race & ethnicity Disability Sex Gender reassignment Religious belief Sexual Orientation Age Pregnancy & maternity Marriage & civil partnership status

**Factors to consider in the assessment:** For each of the groups below, an assessment has been made on whether the proposed

decision will have a **positive, negative or neutral impact**. This is must be noted in the table below alongside brief details of why this conclusion has been reached and notes of any mitigation proposed. Where the impact is negative, a **high, medium or low assessment** is given. The assessment rates the impact of the policy based on the current situation (i.e. disregarding any actions planned to be carried out in future).

**High impact** – a significant potential impact, risk of exposure, history of complaints, no mitigating measures in place etc.

**Medium impact** –some potential impact exists, some mitigating measures are in place, poor evidence

**Low impact** – almost no relevancy to the process, e.g. an area that is very much legislation led and where the Council has very little discretion

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
<b>Race and ethnicity</b> (including Gypsies and Travellers; migrant workers; asylum seekers).	Neutral	Low	<p>Data from the 2021 Census Profile for the ward of Mincinglake and Whipton report that 4% of the local population identified as Asian, Asian British or Asian Welsh, 1.1% identified as Black, Black British, Black Welsh, Caribbean or African. 1.2% of the local population identified as mixed or multiple ethnic groups and 1.5 % identified as another ethnic group. 92% of the local population identified as White.</p> <p>The Local Authority Consultation Report indicates that less than 1% of respondents identified as mixed/multiple ethnic groups. Less than 1% identified as White Irish, and less than 1% identified as any other ethnic group. 2% identified as Asian/Asian British Indian and 4% identified as any other White background. 5% preferred not to respond and 89% of respondents identified as White English/Welsh/Scottish/NI/British.</p> <p>Race and ethnicity characteristics for staff were gathered from a live system at the time of writing this document. Of the data provided, less than 1% identified as Pakistani, less than 1% were recorded as Chinese, less than 1% were recorded as White Asian and less than 1% were recorded as any other white background. Less than 1% stated they were from a mixed background or other ethnic group. 52% were recorded as unknown, 40% were recorded as White British, and 3% were not stated.</p>

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
			<p>Usage data on race and ethnicity is not routinely collected by the leisure management software used by the centre.</p> <p>There is no evidence available of specific impact on those with different races or ethnicities and no targeted provision at Northbrook Swimming Pool in relation to race or ethnicity.</p> <p>Centre activities at Northbrook Swimming Pool are equally accessible to all racial/ethnic groups.</p>
<p><b>Disability:</b> as defined by the Equality Act – a person has a disability if they have a physical or mental impairment that has a substantial and long-term adverse impact on their ability to carry out normal day-to-day activities.</p>	Negative	Medium	<p>Data from the 2021 Census Profile for the ward of Mincinglake and Whipton report that 8.7% of the population identified as disabled under the Equality Act with day-to-day activities limited a lot. 12.6% of the population identified as disabled under the Equality Act with day-to-day activities limited a little. 7.2% reported as not disabled under the equality act but had a long term physical or mental health condition which did not limit day-to-day activities. 71% of the local population identify as not disabled under the Equality Act.</p> <p>The Local Authority Consultation Report indicates that 38% of respondents reported to having a long-term health condition, whereas 56% reported they did not. 6% of respondents preferred not to state whether they had a long-term health condition.</p> <p>Usage data on disability is not routinely collected by the leisure management software used by the centre.</p> <p>Disability characteristics for staff were gathered from a live system at the time of writing this document. Of the data provided 2.3% of staff were recorded as disabled and 35% were recorded as not disabled. 62.5% was unknown.</p>

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			<p>There is no targeted provision at Northbrook Swimming Pool in relation to disability. Northbrook Swimming Pool is not Disability Discrimination Act (DDA) compliant and there are no disabled changing spaces or disabled access into either the building or the swimming pool itself.</p> <p>However, Local Authority Consultation reported that there were health and wellbeing impacts for those with a disability who access the swimming pool. This included physical impacts in relation to general health or managing their condition as well as mental wellbeing impact if social interaction was lost.</p> <p>Northbrook Swimming Pool was reported to be a lifeline to some users in difficult and trying times in their lives, whilst others reported they had come to depend on the swimming pool in supporting their routines for positive mental and physical health. People with neurodivergence reported that Northbrook Swimming Pool was a welcoming place that helped them tackle loneliness and isolation.</p> <p>People with disabilities who use Northbrook Swimming Pool also felt more reluctant to use alternative centres due to their larger size. The other swimming pools in the city were reported as intimidating, overwhelming and anxiety inducing by some respondents, with a sense that these issues would be exacerbated for those with mental health conditions or those with neurodivergence. People with disabilities reported that the small size of Northbrook meant they felt more comfortable and more able to use the facility as it is quieter and more personal.</p> <p>During the consultation, of those who stated they suffer from a long-term health condition, a number of responses indicated that it was daunting to</p>

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
			<p>think about joining another leisure centre and that it wouldn't be easy to travel to alternative provision.</p> <p>Furthermore, it was also reported that the closure of Northbrook Swimming Pool would also impact SEND children who use the swimming pool for lessons as Northbrook provides a quieter environment which is beneficial to their needs.</p> <p><b>Mitigating Actions:</b>  Signpost users of Northbrook to alternative provision within the city - there are two DDA compliant leisure centres available in the City Council's portfolio, both of which have access to accessible changing areas and swimming pool equipment such as pool lift platforms and hoists.</p> <p>Carry out a full audit of current activity within the leisure portfolio to identify potential gaps in provision for disabled users, with a focus on the involvement of disabled people and disability groups in shaping any alternative provision.</p>
<b>Sex</b>	Negative	Medium	<p>Data from the 2021 Census Profile for the ward of Mincinglake and Whipton report that 52% of the local population were female and 48% were reported to be male.</p> <p>The Local Authority Consultation Report indicates that 75% of respondents were female and 21% were male.</p> <p>Of those that provided the data, Leisure management software report that 46% of users at Northbrook Swimming Pool are female and 13% of users are male. 41% of users did not specify a gender.</p> <p>Sex characteristics for staff were gathered from a live system at the time of writing this document. 55.8% were reported as female and 43.9% were</p>

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
			<p>reported as male, therefore there would be a slightly higher impact on female staff.</p> <p>There is no targeted provision in relation to sex/gender at Northbrook Swimming Pool and centre activities are accessible to all sex/genders. However, those who have identified themselves as 'female' have higher usage levels at Northbrook Swimming Pool and so a closure may have a higher impact on those groups.</p> <p>Of those who completed the survey, more females than males stated that travel to an alternative location wouldn't be easy, and that it was too expensive to travel by public transport. Furthermore, more females than males stated it was daunting to think about joining a different leisure centre.</p> <p><b>Mitigating Actions</b> Carry out a full audit of current activity within the leisure portfolio to identify potential gaps in provision for sex, with a focus on the involvement of local groups in shaping any alternative provision.</p>
<b>Gender reassignment</b>	Neutral	Low	<p>There is no data available from either the 2021 Census Profile or the Local Authority Consultation.</p> <p>Usage data on gender reassignment is not routinely collected by the leisure management software used by Northbrook Swimming Pool.</p> <p>There have been no disclosures from staff members in relation to gender reassignment.</p> <p>There is no evidence available of specific impact and no targeted provision at Northbrook Swimming Pool in relation to gender reassignment.</p> <p>Centre activities at Northbrook Swimming Pool are equally accessible to all people who have undergone gender reassignment.</p>

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
<b>Religion and belief</b> (includes no belief, some philosophical beliefs such as Buddhism and sects within religions).	Neutral	Low	<p>Data from the 2021 Census Profile for the ward of Mincinglake and Whipton report that 46% of the local population were reported to have no religion or belief, followed by 43% who reported to be Christian. 16.9% of people identify as Buddhist, Muslim, Hindu, Jewish or Sikh and 5.9% failed to answer.</p> <p>There is no data available from the Local Authority Consultation in relation to religion and belief.</p> <p>Usage data on religion/belief is not routinely collected by the leisure management software used by Northbrook Swimming Pool.</p> <p>There have been no disclosures from staff members in relation to religion or belief.</p> <p>There is no evidence available of specific impact and no targeted provision in relation to religion or belief.</p> <p>Centre activities at Northbrook Swimming Pool are equally accessible to all religion/belief groups.</p>
<b>Sexual orientation</b> (including heterosexual, lesbian, gay, bisexual).	Neutral	Low	<p>Data from the 2021 Census Profile for the ward of Mincinglake and Whipton report that 5.3% were reported to identify as either gay, lesbian, bisexual, pansexual, asexual, queer or other sexual orientation. 82.6% of the local population identified as either straight or heterosexual. 8.5% failed to answer.</p> <p>There is no data available from the Local Authority Consultation in relation to sexual orientation.</p> <p>Usage data on sexual orientation is not routinely collected by the leisure management software used by Northbrook Swimming Pool.</p>

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
			<p>There have been no disclosures from staff members in relation to sexual orientation.</p> <p>There is no evidence available of specific impact and no targeted provision in relation to sexual orientation.</p> <p>Centre activities at Northbrook Swimming Pool are equally accessible regardless of sexual orientation.</p>
<p><b>Age</b> (children and young people aged 0-24; adults aged 25-50; younger older people aged 51-75/80; older people 81+; frail older people; people living with age related conditions. The age categories are for illustration only as overriding consideration should be given to needs).</p>	Negative	Medium	<p>Data from the 2021 Census Profile for the ward of Mincinglake and Whipton report that the majority of people (19.5%) were aged between 50 and 64 years. 13.8% were between the ages of 25 to 34, 18.5% were between the ages of 35 to 49. 16% of the local population were aged between 65 and 85 years and 2.6% were 85+ years. 12% were reported to under the age of 24 years.</p> <p>The Local Authority Consultation Report indicates that the majority of respondents were between the ages of 55 and 64 years (22%). 10% were aged between 25 and 34 years, 21% were between the ages of 35 and 44 years and 18% were between the ages of 45 and 54. 13% were between the ages of 65 and 74, and 12% were 75+. Respondents had to be over the age of 16 to complete the consultation, therefore only 2% of respondents were between the ages of 16-24 years.</p> <p>Leisure management software report that 12% of the users at Northbrook Swimming Pool are between the ages of 0 and 24, 13.7% between the age of 25 and 34, 28.9% between the ages of 35 to 49, and 23% aged between 50 and 64. 16.1% of users are between the ages of 65 and 74 and 4.1% of users are aged 75+.</p> <p>Age characteristics for staff were gathered from a live system at the time of writing this document. 2.3% reported to be under the age of 18, 68.3%</p>

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
			<p>reported to be between the ages of 18 and 30, 9.6% reported to be between the ages of 31 and 40, 10% reported to be between the ages of 41 and 50, 5.7% reported to be between the ages of 51 and 60, and 4.1% reported to be over the age of 60.</p> <p>Users of all ages will be negatively impacted by the closure of Northbrook Pool, however, children and young people, and older people may be especially so.</p> <p>Northbrook Swimming Pool provides limited activity targeted specifically at children and young people (school holiday splash sessions) and older people (Water Exercises for the Elderly (WFTE)) which may further impact those age groups by a lack of targeted provision in the locality.</p> <p><b>Older People</b> Local Authority Consultation identified that among users of all ages, but particularly those in older age groups, there was concern that closure would mean an impact to their friendships and support networks that they have built over time. There was concern that the community, social connections and networks of support could not be picked up and transferred to a different location within the city.</p> <p>For many people, but again particularly users in an older age group, there was a strong feeling that closure would take away their only option in the city to swim for exercise with any regularity, as well as diminishing a long-held hobby. There was a clear preference for swimming over other types of exercise due to it being low impact, good for joint health and positive recovery from illness. Not being able to swim locally would take away this option because of an inability to get to other pools.</p>

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			<p>There was a section of people who openly found other pool facilities in the city to be intimidating, overwhelming and anxiety inducing. People found the small size of Northbrook and the friendly atmosphere more welcoming than the other larger pools which feel unwelcoming, making a transition to those facilities a barrier. It was reported that this would have more of an impact on older users. During the consultation, there were a number of responses from those over the age of 55 in relation to the statement 'it's daunting to think about joining another leisure centre'.</p> <p>Northbrook Swimming Pool was seen as a welcoming place that helps users from different walks of life tackle loneliness and isolation, and this was particularly true for older people.</p> <p>Being time poor and not being able to fit in extended travel time for swimming exercise was felt across the users including older people. This feeling was exacerbated by the need for many to use buses to travel to alternative pools.</p> <p>There was a strong feeling that closure would present a substantial barrier of affordability when it came to attending different facilities. Northbrook is seen as an affordable local option for many older residents. The increased cost of alternative travel (bus and car) was seen as prohibitive to continuing exercise.</p> <p>Older aged people mentioned that mobility issues would become a major barrier to them easily being able to travel across the city. The consultation highlighted a number of responses from those over the age of 55 regarding the expense of public transport in accessing alternative provision.</p> <p><b>Children &amp; Young People</b></p>

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
			<p>Local Authority Consultation identified an importance in the swimming pools education of children. Feedback identified that Northbrook Swimming Pool played an important role in the education of local children in a priority area of the city. There was concern that if the facility were to close, local children would miss out on vital education.</p> <p><b>Young Mothers &amp; Families</b>  Additional impacts were identified for young mothers and families with young children. These included the risk of isolation and loneliness, and barriers faced with being considered 'time poor' and needing to use a bus to access alternative pools which were reported as being unreliable, expensive and stressful, especially with young children.</p> <p><b>Mitigating Actions</b>  Carry out a full audit of current activity within the leisure portfolio to identify potential gaps in provision for users of different ages, with a focus on the involvement of different age groups in shaping any alternative provision. (There are alternative groups (WFTE) targeted to those in a specific age group (older people) at the two alternative swimming pools within the city. There is also potential scope to introduce swim sessions aimed at children at the alternative swimming pools to mitigate this impact).</p> <p>Work with relevant services to ensure the views of people of all ages are captured and used to help identify future priorities for sport and leisure activities, within available resources.</p> <p>Develop and implement 'Travel Plans' to maximise accessibility to alternative provision by all means of transport.  Introduce familiarity sessions for people of all ages, but particularly those of an older age who may be more fearful of using a larger pool.</p>

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
<b>Pregnancy and maternity</b> including new and breast feeding mothers	Neutral	Low	<p>Consider costs of sessions alongside travel costs to ensure affordability.</p> <p>There is no data available from either the 2021 Census Profile or the Local Authority Consultation.</p> <p>Usage data on pregnancy and maternity is not routinely collected by the leisure management software used by Northbrook Swimming Pool.</p> <p>There have been no disclosures from staff members in relation to pregnancy and maternity.</p> <p>There is no evidence available of specific impact and no targeted provision in relation to pregnancy or new and breast-feeding mothers.</p> <p>Centre activities at Northbrook Swimming Pool are equally accessible regardless of sexual orientation.</p>
<b>Marriage and civil partnership status</b>	Neutral	Low	<p>Data from the 2021 Census Profile for the ward of Mincinglake and Whipton report that 48.7% of the local population were either never married or in a civil partnership, 35.7% were married or in a civil partnership, 1.8% were separated but still married or in a civil partnership, 8.8% were divorced or had a civil partnership dissolved and 5% were widowed or a surviving partner in a civil partnership.</p> <p>There is no data available from the Local Authority Consultation in relation to marriage or civil partnership.</p> <p>Usage data on marriage and civil partnership status is not routinely collected by the leisure management software used by Northbrook Swimming Pool.</p> <p>There have been no disclosures from staff members in relation to marriage and civil partnerships.</p>

Protected characteristic/ area of interest	Positive or Negative Impact	High, Medium or Low Impact	Reason
			<p>There is no evidence available of specific impact and no targeted provision in relation to marriage and civil partnership status.</p> <p>Centre activities at Northbrook Swimming Pool are equally accessible regardless of marriage and civil partnership status.</p>

**Actions identified that will mitigate any negative impacts and/or promote inclusion**

- Carry out a full audit of current activity within the leisure portfolio to identify potential gaps in provision for all protected characteristics, with a focus on the involvement of local groups in shaping any alternative provision.
- Work with relevant services to ensure the views of people of all protected characteristics are captured and used to help identify future priorities for sport and leisure activities, within available resources.
- Develop and implement 'Travel Plans' to maximise accessibility to alternative provision by all means of transport.
- Introduce familiarity sessions for people of all ages, but particularly those of an older age who may be more fearful of using a larger pool.
- Consider costs of sessions to ensure affordability.

**Officer: Ian Collinson – Strategic Director - Place**

**Date: 19.05.25**