

**ARMAGH CITY, BANBRIDGE AND CRAIGAVON BOROUGH COUNCIL**

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<b>Policy Nominated Officer:</b>	<b>Joanne Grattan – Customer Services Manager</b>
<b>Equality screened/Rural Impact Assessed by:</b>	<b>Joanne Grattan – Customer Services Manager</b> <b>Mary Hanna – Policy &amp; Diversity Officer</b>
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## AMENDMENT RECORD SHEET

Remove and destroy old pages. Insert new pages as indicated.

<b>Revision Number</b>	<b>Page Number</b>	<b>Date Revised</b>	<b>Description of Revision</b>

## Concession Policy Leisure Services

### Background

The Council's Concession Policy is to ensure a consistent and transparent approach to charging for its services. This paper sets out the rationale for concession prices, the groups that will be included and the recommended discount that is proposed.

### The rationale for concessions prices

The Borough Community Plan 'Connected' 2017–2030, has identified 'healthy communities' as a priority, with the goal to actively engage in an inclusive manner with local communities with healthy communities being a key target; to help:

- People have a greater understanding of the benefits of adopting healthy lifestyle choices and how to protect, manage and improve their physical health.
- People feel more comfortable talking about mental health and understand the importance of achieving emotional wellbeing and positive mental health throughout their lifetime.
- The adoption of a more collaborative approach, centred on community knowledge, skills and resources has increased our understanding of health in disadvantaged populations to focus our resources where they are most needed.

The Council's Corporate Plan reflects the long term outcomes identified in the Community Plan. Commitments in our Corporate Plan include:

- Working with partners to reduce inequalities in health
- Providing a range of quality opportunities for everyone to be active and healthy.

Council wants to recognise the importance of providing high quality Health and Wellbeing services and to encourage all citizens to fully utilise its facilities.

There are a number of publications published by our partnership agencies such as the **Active Ageing Strategy -Dept of Communities 2016-2021, Making-Life-Better-Strategic-Framework-2013-2023, NI Executive, Active-Living-No-Limits-Action-Plan-2016-2021, Sport NI, Active Living: No Limits 2021, Action Plan; Disability Sport NI**; these demonstrated that "health to a larger extent is affected by economic, social and environmental factors".

These publications have identified Councils as a key partner to deliver a reduction in health inequalities in a number of outcomes focused on Older People, those with a Disability, Children and Young People.

Concessionary rates should be in place to better assist and encourage those groups of people who are less likely to use the leisure facilities provided by the Council as a result of having less disposable income or as a group who are at risk of poorer health outcomes.

## Included Groups

This should be determined by considering all of the following factors;

- The potential to increase the levels of physical activity of targeted groups of people.
- The opportunity to improve health and reduce health inequalities.
- The opportunity to improve physical and mental wellbeing of people of all ages.
- The potential to reduce the risk of groups being excluded because of a lack of disposable income to access facilities.
- The opportunity to impact on groups of people where the benefit of physical activity will have a significantly higher impact.
- Consideration of the promotion of equality of opportunity (Section 75).
- Ensuring that the criteria used to determine entitlement to a concessionary rate can be determined clearly and fairly.

It is proposed that the following groups be included in the ABC concessionary category:-

<b>Concessionary Group</b>	<b>Entitlement Criteria ( which may be requested)</b>	<b>Section 75 Category</b>
Adults of 60 years of age and over	Documentary proof of identification and age	Age
Children of 17 years and under	Documentary proof of identification and age	Age
Students	Documentary proof of student status	Students in full time or part – time education (secondary or higher or further education )
Children of 4 years of age and under	Documentary proof of identification and age	Age
Disabled People	Receipt of Personal Independence Payment (PIP) or holder of a 'Blue Badge'	Disability
Those in receipt of benefits	Those in receipt of benefits; documentary proof required (proof to be produced every 2 months)	N/A

## **Proposed Concessionary Rate**

Benchmarking has been carried out to determine the average % concession which is applied across 11 Councils' leisure facilities across Northern Ireland, by comparing the published concessionary price with the price of that activity (Appendix 1).

As a result of this research, it is proposed that for all activities where concession prices apply across ABC Leisure that each and every concessionary price should be 65% of the normal adult price for that activity.

The only exceptions to this are no charge will be applied to the following users:

- (a) Adults of 60 years of age and over for each swim session during public swimming times.
- (b) Children of 4 years and under for each swim session during public swimming times.
- (c) Carers will be able to avail of swimming activities free when accompanying those with a disability.
- (d) Those with a disability for each swim session during public swimming times.

## **Entitlement Criteria**

It is important that the system for concessionary rates is not abused and persons seeking to obtain a concession should be able to clearly demonstrate that they meet the criteria. This is also important for staff at operational level who frequently have difficulty in dealing with customers claiming entitlement:

- Age is easily demonstrated.
- Disability can be demonstrated by showing evidence that the person is in receipt of P.I.P; this method remains the best and most up to date way of determining eligibility.
- Benefits: evidence can be produced that a person is in receipt of a benefit.

## **Policy Screening**

The pricing policy, particularly with regard to the concessionary rates, has been screened in accordance with equality procedures.

Evidence used in the policy screening has included:-

Review of any complaints/comments made regarding concessionary rates across the three council areas, these have been addressed through harmonisation of prices.

Feedback from customer/residential surveys and previous consultations (particularly in relation to the production of Disability Action Plans). There has been generally very little comment or complaint made with regard to concessionary rates, except with regard to the need for a concession for carers of the severely disabled which has been addressed.

The policy screening has identified no significant adverse impact and equality impact assessment is not recommended at this time. However, feedback following the introduction of new rates will be kept under review

**AGREED that**

**(a) The Concession Policy for Leisure Services for ABC Leisure Prices is approved;  
and**

**(b) A Concession Rate of 65% of full activity price is applied**

Appendix 1:

	Public Swimming						
Council Area	Adult	Adult C/cession	Over 60	Free Toddler	Disability	Family	Family C/cession
Antrim and Newtownabbey Borough Council	£5.00	£3.00	FREE	Under 5	£3.00	£12.00	N/A
Ards and North Down Borough Council (Ards)	£4.00	£2.50	£2.50	Under 5	£2.50	£11.00	N/A
Ards and North Down Borough Council (Bangor)	£4.00	£2.75	£2.50	Under 3	£2.75	£11.50	£8.00
Armagh City, Banbridge and Craigavon (Currently)	£3.60	£2.35	FREE	Under 5	FREE	£9.00	N/A
Belfast City Council	£4.50	£1.75	£1.75	Under 3	£1.75	£9.90	£7.50
Causeway Coast and Glens Borough Council	£3.70	£2.50	£2.50	Under 5	£2.50	£10.70	N/A
Derry City and Strabane District Council	£2.50	£1.90	Over 65	Under 5	£1.90	N/A	N/A
Fermanagh and Omagh District Council	£3.10	£2.10	£1.60	Under 5	£2.10	£8.80	N/A
Lisburn and Castlereagh City Council	£3.60	£2.50	FREE	Under 5	£2.50	N/A	N/A
Mid and East Antrim Borough Council	£3.40	£2.35	Over 65	Under 5	£2.35	£10.00	N/A
Mid Ulster District Council - Dungannon	£3.40	£1.60	£1.70	Under 3	£1.55	£8.90	N/A
Newry, Mourne and Down District Council	£3.20	£2.50	£2.40	Under 4	£2.50	£9.60	N/A

Fermanagh and Omagh District Council offer over 60 FREE Friday 8.30 - 9.30

Fermanagh and Omagh District Council offer diasabilty FREE last Friday month 1 hour

## Policy Screening Form

### Policy Scoping

**Policy Title:** Concession policy for ABC Council, Health and Recreation prices

**Brief Description of Policy (please attach copy if available). Please state if it is a new, existing or amended policy.**

The policy sets out the rationale for concession prices for ABC council leisure activities, the groups that will be included and the recommended discount that is proposed.

**Intended aims/outcomes. What is the policy trying to achieve?**

The policy aims to achieve a fair and transparent approach to concessions. Concessionary rates should be in place to better assist and encourage those groups of people who are less likely to use the leisure facilities provided by the council as a result of having less disposable income or as a group who are at risk of poorer health outcomes.

### Policy Framework

Has the policy been developed in response to statutory requirements, legal advice or on the basis of any other professional advice? Does this affect the discretion available to Council to amend the policy?

The Borough Community Plan 'Connected' 2017–2030, has identified 'healthy communities' as a priority, with the goal to actively engage in an inclusive manner with local communities with healthy communities being a key target.

Commitments in our Corporate Plan include:

- Working with partners to reduce inequalities in health
- Providing a range of quality opportunities for everyone to be active and healthy.

Council wants to recognise the importance of providing high quality Health and Wellbeing

services and to encourage all citizens to fully utilise its facilities.

There are a number of publications published by our partnership agencies such as the **Active Ageing Strategy -Dept of Communités 2016-2021, Making-Life-Better-Strategic-Framework-2013-2023, NI Executive, Active-Living-No-Limits-Action-Plan-2016-2021, Sport NI, Active Living: No Limits 2021, Action Plan; Disability Sport NI**; these demonstrated that “health to a larger extent is affected by economic, social and environmental factors”.

These publications have identified Councils as a key partner to deliver a reduction in health inequalities in a number of outcomes focused on Older People, those with a Disability, Children and Young People.

**Are any Section 75 categories which might be expected to benefit from the policy? If so, please outline.**

The concessions are particularly relevant to people with disabilities, their carers, senior citizens and young people. Concessions also apply to other persons likely to experience economic disadvantage ( unemployment and being a student) who will be multiple identity from a Section 75 viewpoint.

**Who initiated or wrote the policy (if Council decision, please state). Who is responsible for implementing the policy?**

<b>Who initiated or wrote policy?</b>	<b>Who is responsible for implementation?</b>
Joanne Grattan –Customer Services Manager	Leisure managers and staff from the Health and Recreation Department

**Are there any factors which might contribute to or detract from the implementation of the policy (e.g. financial, legislative, other)?**

None identified.

Prevention of misuse of the scheme by those who do not genuinely qualify for a concession will be facilitated through the evidence required before a concession is granted.

**Main stakeholders in relation to the policy**

Please list main stakeholders affected by the policy (e.g. staff, service users, other statutory bodies, community or voluntary sector, private sector)

Service users, particularly those suffering economic disadvantage because of age, disability or other factors.

Council staff.

General population by encouraging more people to engage in sport and leisure with subsequent impact on health and well-being.

**Are there any other policies with a bearing on this policy? If so, please identify them and how they impact on this policy.**

See main policy on Pricing for Leisure Services

### Available Evidence

Council should ensure that its screening decisions are informed by relevant data. What evidence/information (both qualitative and quantitative) have you gathered to inform this policy? Specify details for each of the Section 75 categories.

Section 75 category	Evidence
Religious belief	General demographics only – not monitored for leisure service users. (Note: location of leisure facilities may affect community background of users but this is not relevant to this policy).
Political opinion	General demographics only – not monitored for leisure service users. (Note: location of leisure facilities may affect community background of users but this is not relevant to this policy).
Racial group	General demographics only – not monitored for leisure service users
Age	See note below
Marital status	General demographics only – not monitored for leisure service users

Sexual orientation	General demographics only – not monitored for leisure service users
Men and women generally	General demographics only – not monitored for leisure service users
Disability	See note below
Dependants	See note below

Note: Data used in the development of the policy and its screening include general demographic data, information on take-up of concessions, customer feedback and complaints with regard to pricing generally and concessions in particular; survey results on satisfaction with leisure service provision; benchmarking data on prices and concessions with other councils in Northern Ireland; qualitative and anecdotal evidence from managers and other front line staff delivering leisure services. Consultation with Disability Action regarding concessions and evidence requirements; Consultation with Works & Benefits Office regarding evidence requirements for the unemployed.

### **Needs, experiences and priorities**

Taking into account the information gathered above, what are the different needs, experiences and priorities of each of the following categories in relation to this particular policy/decision?

<b>Section 75 category</b>	<b>Needs, experiences and priorities</b>
Religious belief	Not applicable to this policy
Political opinion	Not applicable to this policy
Racial group	Ethnic minorities may be more likely to suffer economic disadvantage (i.e. be unemployed, particularly if their English skills are poor) but this is considered to be an issue of multiple identity where the relevant users will be able to access concessions under other categories.
Age	Older people and younger people more likely to suffer economic disadvantage (i.e. not in employment)
Marital status	Not applicable to this policy
Sexual orientation	Not applicable to this policy
Men and women generally	More women, particularly those with young children, may not be in work but are not actively seeking employment. However, this has not been identified as an issue to date by users and it may be that such persons can avail of other price reductions (e.g. off peak offers, family tickets) not

	covered in this policy.
Disability	People with a disability more likely to suffer economic disadvantage. They may also need to be accompanied by carers.
Dependants	Those with dependants (e.g. families with children) may be at a financial disadvantage compared with those who do not have dependants. However, this has not been identified as an issue to date by users and it may be that such persons can avail of other price reductions (e.g. off peak offers, family tickets) not covered in this policy.

## Screening Questions

### 1. What is the likely impact on equality of opportunity for those affected by this policy for each of the Section 75 categories?

Category	Policy Impact	Level of impact (Major/minor/none)
Religious belief		None
Political opinion		None
Racial group	Potential positive impact for those not in employment	Minor
Age	Positive impact for older persons and younger persons	Major but positively addressed by policy
Marital status		None
Sexual orientation		None
Men and women generally		None
Disability	Positive impact for persons with a disability and their carers	Major but addressed via policy
Dependents		None

**2. Are there opportunities to better promote equality of opportunity for people within the Section 75 categories?**

Category	If yes, provide details	If no, provide reasons
Religious belief		No
Political opinion		No
Racial group	Yes – for those who are unemployed	
Age	Yes – concessions for those older and younger persons more likely to be at a financial disadvantage	
Marital status		No
Sexual orientation		No
Men and women generally		No
Disability	Yes – concessions for people with a disability and their carers	
Dependents		No – likely to be addressed via other pricing policies (off peak, family ticket offers etc)

**3. To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion, or racial group?**

Category	Details of Policy Impact	Level of impact (major/minor/none)
Religious belief		None
Political opinion		None
Racial group		None

**4. Are there opportunities to better promote good relations between people of different religious belief, political opinion or racial group?**

Category	If yes, provide details	If no, provide reasons
Religious belief		Not applicable
Political opinion		Not applicable
Racial group		Not applicable

**Multiple Identity**

Generally speaking, people fall into more than one Section 75 category (for example: disabled minority ethnic people; disabled women; young Protestant men; young lesbian, gay and bisexual people). Provide details of data on the impact of the policy on people with multiple identities. Specify relevant s75 categories concerned.

Service users cover all nine categories and people gaining a benefit from a concession will fall into a number of categories.

**Disability Discrimination (NI) Order 2006**

Is there an opportunity for the policy to promote positive attitudes towards disabled people?

Yes – through encouraging more people with disabilities to take part in sport and leisure activities

Is there an opportunity for the policy to encourage participation by disabled people in public life?

Through encouraging participation, people with disabilities may be encouraged to also serve on sports forums, user groups etc.

## Screening Decision

### **A: NO IMPACT IDENTIFIED ON ANY CATEGORY – EQIA UNNECESSARY**

Please identify reasons for this below

No adverse impact has been identified on any category – rather the policy will have a positive impact particularly with regard to the categories of disability and age.

The provision of concessionary rates creates a positive impact on certain Section 75 categories (which also covers multiple identity). Pricing and concessionary rates have not been identified through consultation, surveys, complaints or general feedback as an issue.

Advice has been sought from Disability Action and the Jobs & Benefits Office on the provision of documentary evidence to receive a concession (and prevent abuse of the scheme).

### **B: MINOR IMPACT IDENTIFIED – EQIA NOT CONSIDERED NECESSARY AS IMPACT CAN BE ELIMINATED OR MITIGATED**

Where the impact is likely to be minor, you should consider if the policy can be mitigated or an alternative policy introduced. If so, EQIA may not be considered necessary. You must indicate the reasons for this decision below, together with details of measures to mitigate the adverse impact or the alternative policy proposed.

### **C: MAJOR IMPACT IDENTIFIED – EQIA REQUIRED**

If the decision is to conduct an equality impact assessment, please provide details of the reasons.

## **Timetabling and Prioritising**

If the policy has been screened in for equality impact assessment, please answer the following questions to determine its priority for timetabling the equality impact assessment.

On a scale of 1-3 with 1 being the lowest priority and 3 being the highest, assess the policy in terms of its priority for equality impact assessment.

<b>Priority criterion</b>	<b>Rating (1-3)</b>
Effect on equality of opportunity and good relations	
Social need	
Effect on people's daily lives	

The total rating score should be used to prioritise the policy in rank order with other policies screened in for equality impact assessment. This list of priorities will assist the council in timetabling its EQIAs.

Is the policy affected by timetables established by other relevant public authorities? If yes, please give details.

## **Monitoring**

Effective monitoring will help the authority identify any future adverse impact arising from the policy. It is recommended that where a policy has been amended or an alternative policy introduced to mitigate adverse impact, monitoring be undertaken on a broader basis to identify any impact (positive or adverse).

Further information on monitoring is available in the Equality Commission's guidance on monitoring.

Identify how the impact of the policy is to be monitored

Impact of the policy will be monitored through uptake of concessions; feedback and complaints.

## Approval and Authorisation

A copy of the screening form for each policy screened should be signed off by the senior manager responsible for that policy. The screening recommendation should be reported to the relevant Committee/Council when the policy is submitted for approval.

Screened by	Position/Job title	Date
Joanne Grattan-	Customer Services Manager	November 2019
Mary Hanna	Policy & Diversity Officer	
Approved by	Position/Job Title	Date
Mark Parkinson	Strategic Director	November 2019

**Please forward a copy of the completed policy and form to:**

**[mary.hanna@armaghbanbridgecraigvon.gov.uk](mailto:mary.hanna@armaghbanbridgecraigvon.gov.uk) who will ensure that screening forms and policies are available on the Council website.**

**This officer is also responsible for issuing reports on a quarterly basis on those policies “screened out for EQIA”. This allows stakeholders who disagree with this recommendation to submit their views. In the event of any stakeholder disagreeing with the decision to screen out any policy, the screening exercise will be reviewed.**