



Derry City & Strabane
District Council

Comhairle
**Chathair Dhoire &
Cheantar an tSratha Báin**

Derry Cittie & Stràbane
Destrìck Cooncil

Final Equality Impact Assessment Report

for Leisure Pricing Policy

January 2016

Contents

1. Introduction	3
2. Executive Summary	4
3. Background to the Policy	5
4. Socio–Economic Profile of Derry City and Strabane District Council Area	7
5. Consideration of Available Data and Research	15
6. Consideration of Measures to Mitigate any Adverse Impact	28
7. Conclusions	29
8. Monitoring	29
9. Publication of Results	29
<u>Appendices</u>	
Appendix 1 – Consultee List	30
Appendix 2 – Summary of Consultee Responses	35
Appendix 3 – Concessionary Pricing Summary	50

1.0 Introduction

1.1 Section 75 of the Northern Ireland Act 1998 (“the Act”) requires the Council in carrying out its functions, powers and duties to have due regard to the need to promote equality of opportunity:

- ◆ Between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- ◆ Between men and women generally;
- ◆ Between persons with disability and persons without;
- ◆ Between persons with dependants and persons without.

1.2 In addition, without prejudice to its obligations above, the Council shall in carrying out its functions, powers and duties have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group. The Council supports the principles of good relations: equity, respecting diversity and interdependence, and the development of relationships built on trust and respect.

1.3 Derry City and Strabane District Council’s Equality Scheme commits the Council to assess how policy proposals impact on the promotion of equality of opportunity within the terms of Section 75 of the Act.

2.0 Executive Summary

2.1 The aim of any Pricing Policy is to support flexible pricing decisions that can help an organisation respond to customer requirements whilst recouping a reasonable proportion of the Council's expenditure and/or making a satisfactory return on investment. At present Derry City and Strabane District Council aim to:-

- Provide value for money fairly and equally to all and to assist with increasing public access to Council leisure facilities.
- Increase the number of people utilising the leisure facilities and so contribute to the health of the population and the quality of life.
- Ensure that prices are comparable with competitors in the Derry City and Strabane District Council area and on a regional basis.

2.1 In reviewing the Council's current approach to pricing, information was obtained from the leisure departments with the Northern Ireland Councils.

2.2 Information was also gathered from private leisure facilities in the district which gave an insight into provision and standards and charges.

2.3 A Charges Working Group was also established comprising of elected members and Council officers to provide guidance in terms of the price and concessionary rates for leisure services.

2.4 Cognisance was also taken of the fact that the Council provides services to a population base with some of the highest levels of deprivation across Northern Ireland the pricing policy would need to reflect this characteristic in the local market. In reviewing the Council's current approach to pricing, information was obtained from the leisure departments within the Northern Ireland Councils.

2.5 Derry City and Strabane District Council carried out a formal consultation process where it invited written contributions from over 200 consultees (See Appendix 1 for Consultee List). Four face-to-face meetings were also held to allow equality consultee groups/individuals to meet with responsible officers and exchange views.

2.6 Only one written response was received from Disability Action together with verbal contributions from groups and individuals who attended the face-to-face meetings (See Appendix 3).

2.7 Conclusions

Derry City and Strabane District Council has carefully considered the findings of the research and the pre-development and formal consultations. As a result the Council has concluded that the equality impact assessment process has identified potential

differential impacts in relation to all of the Section 75 groups in terms of the provision or non-provision of concessionary rates.

General feedback from the public has been positive in terms of pricing and having analysed consultees' issues Council believe that an awareness raising campaign about the new concessionary rates will allay service users' concerns.

3.0 Background to the Policy

3.1

Within Derry City and Strabane District Council's Corporate Plan there is specific commitments to ensuring that citizens receive improved service delivery and that there is increased participation and engagement in leisure through high quality services provision and sports development programmes delivered in well-managed, fit-for-purpose, sustainable facilities.

3.2

The development of the Sports and Leisure Pricing Policy will govern the range of pricing decisions for Council leisure services. Pricing is considered an integral part of the overall marketing programme, as it will encourage greater access and ultimately increase participation at Council facilities and use of services.

3.3

The previous pricing policies of the legacy councils were inconsistent with different pricing structures evolving over time on a location-by-location basis. Derry City and Strabane District Council deliver its universal services (i.e. supply of wheeled bins, Cemetery services etc.) to everyone who lives within the Council area on a standard price basis, i.e. the same charge is made to all purchasers subject to the nature of the service.

3.4

The Chief Executive will have overall responsibility for ensuring the effective implementation of this policy. Staff, who are working in facility and service areas where a charge is levied, will have responsibility for its operational implementation.

3.5

As already stated the aim of a Pricing Policy is to support flexible pricing decisions that can help an organisation respond to customer requirements whilst recouping a reasonable proportion of the Council's expenditure and/or making a satisfactory return on investment. At present Derry City and Strabane District Council aims to:

- Provide value for money fairly and equally to all and to assist with increasing public access to Council facilities.
- Increase the number of people utilising the leisure and other facilities and so contribute to the health of the population and the quality of life.

- Ensure that prices are comparable with competitors in the Derry City and Strabane District Council area and on a regional basis.

3.6

The proposed policy will contribute towards the achievement of Council's Corporate objectives where is a commitment to ensuring that citizens receive improved service delivery and more effective use of resources while improving the well-being of communities.

3.7

The main stakeholders who will be affected by this policy are local residents, businesses and visitors to the Derry City & Strabane District Council.

3.8

Derry City and Strabane District Council is not aware of any group which might be expected to benefit from the intended outcomes but which do not.

4.0 Socio Economic Profile of Derry City and Strabane District

This section of the report is intended to provide an overview of the socio-economic profile of the Derry City and Strabane District Council area using quantitative data collated from Northern Ireland Research Agency, Police Service for Northern Ireland, Department of Health and Social Services and the Northern Ireland Housing Executive.

4.1 Derry City and Strabane District Council Area Profile

Derry City and Strabane District Council has seven district electoral areas, comprising 40 electoral wards. See Table 1 below for details:-

Table : 1 Derry and Strabane Local Government District			
Number of Wards 40		Total Electorate	104,749
		Ward Electoral Average	2,619
DEA WARDS ELECTORATE		DEA WARDS ELECTORATE	
BALLYARNETT 6 Wards Skeoge 2,597 Shantallow East 2,994 Culmore 2,893 Galliagh 2,857 Shantallow 2,764 Carn Hill 2,430 TOTAL 16,535 <i>Councillor to electorate ratio: 1 to 2,756</i> <i>Deviation from ward electoral average +5.2%</i>		FOYLESIDE 5 Wards Madam's Bank 2,569 Northland 2,973 Springtown 2,608 Ballymagroarty 2,682 Foyle Springs 2,644 TOTAL 13,476 <i>Councillor to electorate ratio: 1 to 2,695</i> <i>Deviation from ward electoral average +2.9%</i>	
ROSEMOUNT 5 Wards Sheriff's Mountain 2,526 Creggan South 2,593 Brandywell 2,700 Creggan 2,835 CityWalls 2,522 TOTAL 13,176 <i>Councillor to electorate ratio: 1 to 2,635</i> <i>Deviation from ward electoral average +0.6%</i>		WATERSIDE 7 Wards Victoria 2,579 Clondermot 2,780 Ebrington 2,608 Caw 2,679 Lisnagelvin 2,568 Kilfennan 2,722 Drumahoe 2,744 TOTAL 18,680 <i>Councillor to electorate ratio: 1 to 2,669</i> <i>Deviation from ward electoral average +1.9%</i>	
FAUGHAN 5 Wards Claudy 2,494 Enagh 2,610 Eglinton 2,761 Slievekirk 2,471 New Buildings 2,762 TOTAL 13,098 <i>Councillor to electorate ratio: 1 to 2,620</i> <i>Deviation from ward electoral average 0.0%</i>		SPERRIN 7 Wards Park 2,479 Dunnamanagh 2,461 Glenelly Valley 2,405 Artigarvan 2,438 Strabane North 2,430 Strabane West 2,426 Ballycolman 2,634 TOTAL 17,273 <i>Councillor to electorate ratio: 1 to 2,468</i> <i>Deviation from ward electoral average -5.8%</i>	
DERG 5 Wards Glenderg 2,445 Castlederg 2,436 Newtownstewart 2,357 Sion Mills 2,550 Finn 2,723 TOTAL 12,511 <i>Councillor to electorate ratio: 1 to 2,502</i> <i>Deviation from ward electoral average -4.5%</i>			

An overview of the Section 75 profile of the new Derry/Strabane Council area is presented below. All data was sourced from the Census 2011 figures, unless otherwise stated.

Derry City and Strabane District Council is sixth largest of the eleven District Councils in Northern Ireland, serving a population of approximately 147,720. A large percentage of the council area is rural in nature with 1680 farms¹ registered to addresses in the area in 2013 and a total agricultural labour force at that time of 3316 persons.

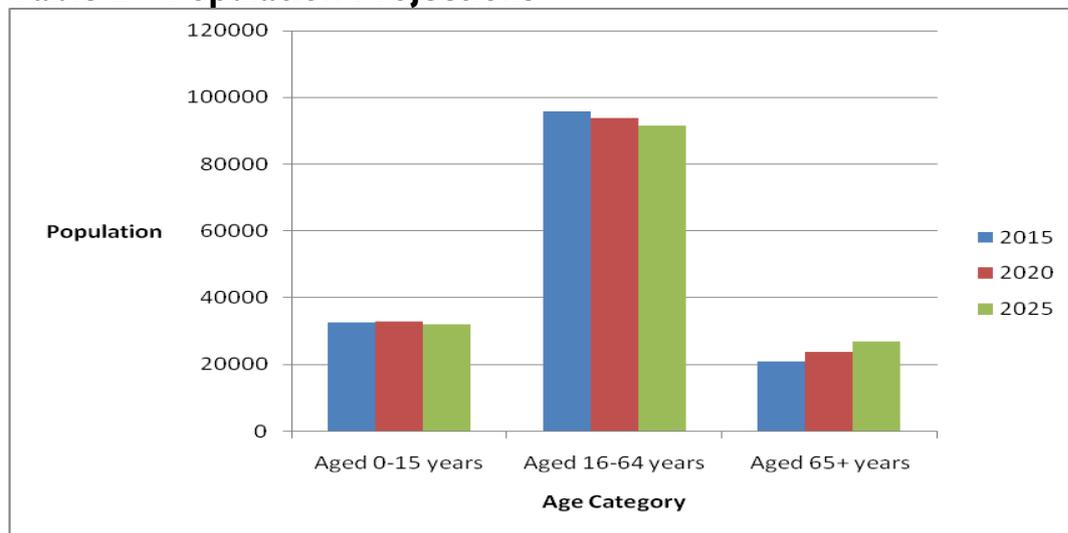
The Council area offers a wide range of attractions for visitors including the historic walls, the Tower Museum, the Sollus Centre and is an important centre for the arts accommodating the Millennium Forum, the Alley Theatre and Conference Centre, the Nerve Centre, the Playhouse and a diverse range of community arts groups.

Sport is well represented with a number of local football, rugby, cricket, GAA and other sporting clubs in the area.

4.2 Key Statistics

The mid-year population estimates for 2013 indicate that the Derry City and Strabane District Council area is home to 148,632 people. Table 2 shows that Population projections indicate that by 2025 the population of the Derry City and Strabane District Council area will be 150,495 persons, with the greatest increase being in the over 65 years age group.²

Table 2 – Population Projections



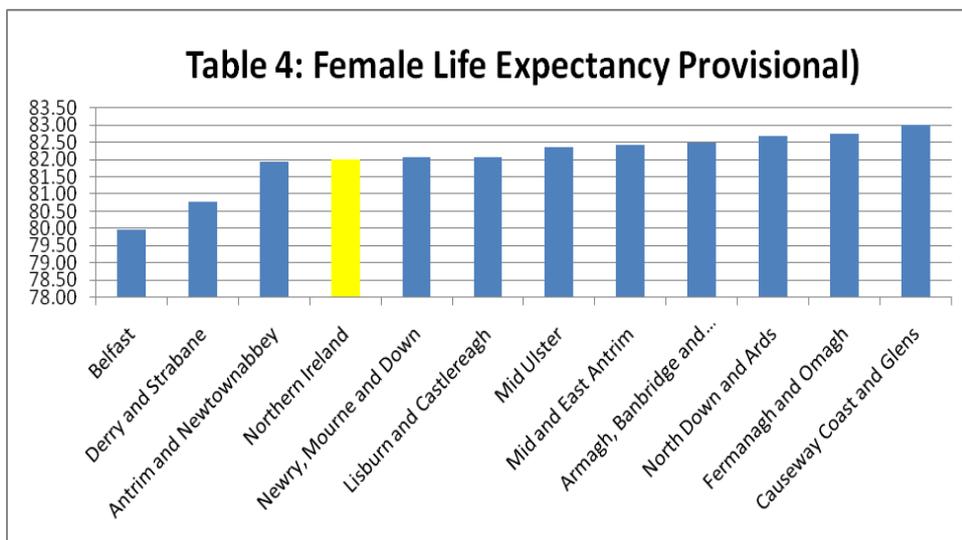
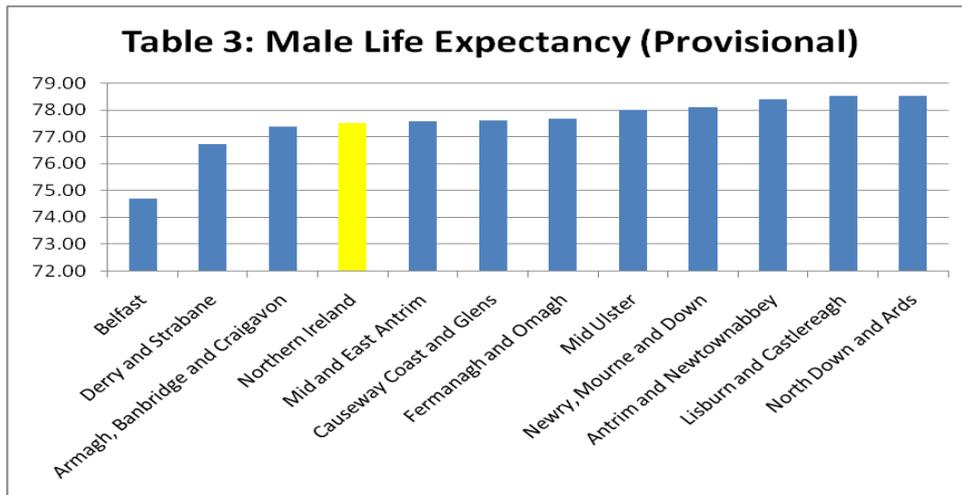
¹ Farm Census 2013 (www.ninis2.nisra.gov.uk/public/pivotgrid.aspx?dataSetVars=ds-5431-lh-73-yn-1999-2013-sk-38-sn-Agriculture%20and%20Environment-yearfilter)

²<http://www.ninis2.nisra.gov.uk/public/Theme.aspx?themeNumber=74&themeName=Population>

4.3 Health

Over the coming years, both the size and the age structure of the population of the Derry/Strabane Council area and indeed Northern Ireland as a whole will alter, potentially changing the demand for health and social care.

Statistics for the period 2009-2011 indicate that the council district has a higher than average mortality ratio. This trend is for both male and female residents – See Tables 3 and 4 below.



Causes of death within the district is detailed in **Table 5** below:

LGD2014	Deaths	Deaths due to Malignant Neoplasms (%)	Deaths due to Circulatory Diseases (%)	Deaths due to Respiratory Diseases (%)	Deaths due to External Causes (%)	Deaths from suicide and undetermined intent (%)
Northern Ireland	14756	28.02	27.11	13.71	4.99	1.88
Derry and Strabane	1089	28.37	26.91	15.34	5.05	2.11

In terms of external causes it would appear that alcohol and drugs are a major contributor – See **Table 6** below:

2013		
LGD2014	Drug Related Deaths (Provisional)	Alcohol Related Deaths (Provisional)
Northern Ireland	115	236
Derry and Strabane	8	29

On Census Day 27th March 2011, in **Derry/Strabane** Local Government District:

- **22.9%** of people had a long-term health problem or disability that limited their day-to-day activities;
- **77.1%** of people stated their general health was either good or very good; and
- **11.3%** of people stated that they provided unpaid care to family, friends, neighbours or others.

4.4 Economic Growth and Deprivation

The Derry/Strabane Council area has experienced low levels of economic activity and in 2011, it was well below the economic activity rates in Northern Ireland with 68.75%. (The NI figure for the same period was 72.5%.)³

	Northern Ireland		Derry City Council		Strabane District Council		Derry/Strabane District Council	
	No. (000s)	rate	No. (000s)	rate	No. (000s)	rate	No. (000s)	rate
Total economic activity	837	72.50%	49	70.90%	17	62.7%	66	68.75%
Men	452	79.10%	27	76.20%	11	76.1%	38	80.50%
Women	385	66.10%	22	65.30%	6	47.9%	28	46.50%
Economically inactive	317	27.50%	20	29.10%	10	37.3%	30	27.90%

Table 8 shows the unemployment rate for the Derry/Strabane area, which was 8.7% as compared to the Northern Ireland average of 5.4%.⁴

District	Number of Claimants			% Of Working Age		
	Males	Females	Total	Males	Females	Total
Derry	4,252	2,021	6,273	12.3%	5.6%	8.9%
Strabane	1,390	673	2,063	10.9%	5.3%	8.1%
Derry/Strabane	5,642	2,694	8336	11.9%	5.5%	8.7%
NI TOTAL	43,446	19,847	63,293	7.5%	3.4%	5.4%

From 2000 to 12th December 2014, there were 4801 redundancies the Derry City Council district with only Belfast City Council recording a higher figure.⁵ Strabane had

³<http://www.detini.gov.uk/deti-stats-index/stats-regional-analysis.htm> (September 2013) - dc briefing 57

⁴ <http://www.detini.gov.uk/deti-stats-index/stats-surveys/stats-claimant-count.htm> (Table 3.8)

⁵ http://www.detini.gov.uk/dca_breakdown_november_2014.xls?rev=0

1173 confirmed redundancies in the same period thus making the total number of confirmed redundancies for the new Council area 5974.

The final results of the Northern Ireland Multiple Deprivation Measure 2010 (NIMDM 2010) were published in summer 2010. The report identifies small area concentrations of multiple deprivations across Northern Ireland. The results for the Derry and Strabane Council areas show that the districts have an Extent of 43% and 44% respectively: this means that 43% of the population of the Derry district and 44% of the population of the Strabane District live in the most deprived Super Output Areas in Northern Ireland⁶. This shows a slight improvement from the Multiple Deprivation Measure 2005 when the Derry City Council area had an Extent of 46% and a significant change for the Strabane District Council area where in 2005 it had an Extent of 54%.

The Income Scale shows that there are 55,881 people in the Derry/Strabane district experiencing income deprivation, while the Employment Scale shows that a total of 16,487 people in the joint council district experience employment deprivation. Both the income and employment deprivation can be presented as rates of the relevant population. 37% of the population have been identified as income deprived while 18% of the population are identified as employment deprived. This can be compared to Northern Ireland as a whole where 25% were identified as being income deprived and 13% identified as being employment deprived.

Table 9: Multiple Deprivation Comparisons	Strabane (LGD) Score	Derry (LGD) Score	Derry/Strabane (LGD) Score
Income Scale	14,394	41,487	55,881
Employment Scale	4,603	11,884	16,487
Percentage of total population income deprived	36%	38%	37%
Percentage of working age population employment deprived	20%	18%	18%

⁶ www.ninis.nisra.gov.uk/mapxtreme/pf_report.asp?Level=Dc&sID=MM&sName=Derry

4.5 Education

- On Census Day 27th March 2011, considering the population aged 16 years old and over in Derry/Strabane Council area:
- **20.3%** had a degree or higher qualification (N.I. Average 23.65%); while
- **46.48%** had no or low (Level 1*) qualifications (N.I. Average 40.63%).

School Leavers

- There were 2,201 school leavers in 2010/11
- Over half of school leavers (54.5%) achieved 2+ A levels (NI 53.3%)
- Over two thirds of school leavers (1552 or 70.5%) had achieved at least 5 GCSE's at grades A-C (or equivalent) (NI 73.2%)
- Just over 60% of school leavers achieved at least 5 GCSE's at grades A-C which included English and Maths (NI 62%)
- 2.27% of the 2,201 school leavers achieved no GCSE's (NI 2.2%).⁷

Table 10: School Leavers Report 2010/11

LGD	School Leavers	2+ A-levels (or equiv)	2+ A-levels (or equiv) %	At Least 5 GCSE's grades A*-C (or equiv)	At Least 5 GCSE's grades A*-C (or equiv) %	No GCSEs	No GCSEs %
Northern Ireland	23160	12342	53.29	16949	73.18	521	2.25
Derry/Strabane Area	2201	1200	54.5	1552	70.5	50	2.27

In 2011 Only 4.2% of school leavers in the Derry/Strabane progressed into employment, this falls well below the Northern Ireland averaged of 6.2%.

Table 11: Destination of School Leavers 2010/11

LGD	School Leavers	Higher Education	Further Education	Employment	Training	Unemployed / Unknown
Northern Ireland	22568	9557	7808	1393	2510	1300
Derry/Strabane	2130	864	770	89	267	140

⁷ http://www.deni.gov.uk/qualifications_and_destinations_1011_revised_aug_12.pdf

4.6 Housing and Transport

According to the findings from the Census 2011 there were

- 65.6% were owner occupied and 32.6% were rented properties in the Derry/Strabane City Council area; 1.8% live rent free.
- 24.6% homes were owned outright – (28.5% NI)

The average household size in 2011 was 2.6 for the new joint Council area, compared to 2.5 for NI as a whole.

Table 12: Average Household Size

LGD	All households	1 person	2 people	3 people	4 people	5 people	6 people	7 people	8 or more people	Average household size
NI	703275	19641 4	21228 6	11792 0	10313 7	49370	18209	3919	2020	2.54
Derry	40779	11366	11364	7079	6130	3129	1239	304	168	2.61
Strabane	14817	3981	4040	2504	2354	1255	530	100	53	2.67
Derry/Strabane	55596	15347	15404	9583	8484	4384	1769	404	221	2.6

Car Registration

In 2011, 7.3% (63604) of all cars registered in Northern Ireland were licensed to addresses in the Derry/Strabane Council area. 12.1% of which were cars registered to a disabled driver or for transporting disabled people⁸ as compared to the Northern Ireland average of 8.35%.

Table 13: Car Registration

	Cars Registered	Cars Registered to a Disabled Driver or for Transporting Disabled People	Cars Registered to a Disabled Driver or for Transporting Disabled People (%)
Northern Ireland	870439	72684	8.35
Derry	44437	5367	12.08
Strabane	19167	2332	12.17
Derry/Strabane	63604	7699	12.1

The average rates bill in the Derry district in 2013/14 was £ 796 with average for Strabane District being £716 - This compares to NI average of £862. The average new house price in the Derry in 2012 was £139,600, the average for Strabane was 124,600 – this compares to a NI average of £144,100⁹.

8. <http://www.ninis2.nisra.gov.uk/public/pivotgrid.aspx?dataSetVars=ds-3153-lh-37-yn-2003-2006,2008-2011-sk-118-sn-Travel%20and%20Transport-yearfilter-->

9 <http://www.ninis2.nisra.gov.uk/public/pivotgrid.aspx?dataSetVars=ds-5782-lh-37-yn-2004-2013-sk-10-sn-People%20and%20Places-yearfilter-->

5.0 Consideration of Available Data and Research

5.1 In conducting this preliminary EQIA the Council took fully into account data and research findings from the following sources.

Primary Research

- Comparative Pricing Research with Leisure Venues in Northern Ireland

Secondary Research

- NISRA,
- Museum Survey – Northern Ireland Museums Council, April 2004
- Wise Up to Child Poverty –Derry Children’s Commission, July 2005
- Fair Employment Return – July 2005
- Equality Database
- Labour Force Survey
- Northern Ireland Anti-Poverty Network, 2002
- Developing Audiences – Heritage Lottery Fund, 2000

5.3 Findings of research carried out among leisure facilities in the region

Research was conducted among leisure facilities in the region. The competitor information provides guidance in terms of prices for facilities. A summary of the information is detailed below in Table 14.

Table 14: Leisure & Sports Services – Schedule of Charges
Local Authority price comparisons:

	Derry & Strabane Proposed	Banbridge	Coleraine	Cookstown	Limavady	Omagh	Armagh	Lisburn
Adult Swim	£2.50	£4.25	£3.50	£2.85	£3.60	£3.00	£3.40	£3.10
Junior Swim	£1.90	£3.05	£2.50	£2.00	£2.00	£2.00	£2.05	£2.00
Pool Hire (25m x 6 lane)	£35.00	£40.00	£50.00	£44.00	£45.00	£40.00	£40.00	n/a
Junior Swim Lessons (per class)	£4.50	£5.60	£5.75	£3.50	£4.75	£6.00	£5.53	£6.00
Adult Swim Lessons (per class)	£4.50	£6.66	£5.75	£3.95	£6.50	£6.00	£6.00	£6.00
Group Exercise (per session)	£4.00	£5.00	£4.00	£4.50	£4.80	£4.50	£3.90	£4.20
Sauna, Steam & Swim	£4.00	£5.20	£5.70	£4.95	£4.80	£5.00	£4.80	£4.50
Gym/Fitness Suite Session	£5.00	£6.00	£6.00	£5.00	£5.50	£5.00	£4.50	£5.80
Gym/Fitness Suite Monthly Membership	£25.00	£35.00	£25.00	£30.00	£30.00	£24.00	£33.00	£34.00
Main Hall Hire (4 badminton court size)	£38.00	£38.00	£34.00	£28.00	£27.00	£25.00	£33.50	£35.00
Squash	£5.50	£6.55	£7.00	£5.80	£4.50	£5.00	£7.00	£5.30
Synthetic Pitch (full size)	£45.00	£52.00	£32.00	£40.00	£38.00	£38.00	£42.00	£35.00
With floodlights	£55.00		£45.00	£55.00		£52.00		
Grass Pitch Adult (full size)	£34.00		£39.50			£35.00	£32.50	£30.00
Junior ½ price								

5.4 Evidence of impact of policy on Religious Belief

Table 15 illustrates the 2011 Census figures breakdown of people by religious belief in the Derry City and Strabane District Council area as being:

Table 15	All usual residents	Catholic	Protestant and other Christian	Other religions	None
Northern Ireland	1,810,863	817,385 (45.14%)	875,717 (48.36%)	16,592 (0.92%)	101,169 (5.59%)
Derry & Strabane	147,720	106,600 (72.16%)	37,527 (25.40%)	940 (0.64%)	2,653 (1.80%)

The 2011 Census showed differences in general health according to religion. Those who were or had been brought up as Catholics were typically more likely than those who belonged to or had been brought up in Protestant denominations to assess their general health as either 'bad' or 'very bad'. The relative differences were more noticeable in the older age groups.¹⁰

In relation to persons with different religious beliefs using the leisure facilities there may be specific requirements such as Muslim women can only avail of the service where there is female only staff during the Ladies Only sessions.

The Continuous Household Survey (CHS) 2011-12 showed that there was no difference between levels of participation in sport between people from a Catholic background and those from a Protestant background.

It is not anticipated that Council's sport and leisure pricing policy would have an adverse impact on this Section 75 category as pricing is applied equally across all leisure facilities in the Council area.

¹⁰ http://www.nisra.gov.uk/census/detailedcharacteristics_stats_bulletin_2011.pdf

5.5 Evidence of impact of policy on Political Opinion

The political opinion of the Council's elected members is as follows:

Sinn Féin	16 seats
SDLP	10 seats
Democratic Unionist	8 seats
Independents	4 seats
Ulster Unionist	2 seats

This breakdown is taken as an approximate representation of the political opinion of people within the Derry City and Strabane District Council area.

Leisure charges are fixed regardless of this s75 grouping and will thus have no differential impact on this category.

5.6 Evidence of impact of policy on Racial Group

Table 16 illustrates the composition of racial groups in the Derry City and Strabane District Council area (NISRA 2011)¹¹ as follows:

Table 16: Racial Profile of Derry City and Strabane District Council

Total Usual Residents	147720
White	145546
Chinese	301
Irish Traveller	116
Indian	670
Pakistani	48
Bangladeshi	23
Other Asian	222
Black Caribbean	53
Black African	86
Black Other	41
Mixed	462
Other	163

Cultural barriers are a particular concern of Muslim women. As is the case with Muslim women, the attitude of service providers and others towards these perceived 'differences' can negatively impact participation rates. A study commissioned by Sporting Equals notes the existence of racism, both institutional and on an individual basis, in sport and PE,

¹¹ Table K506 Ethnic Group, NINIS, NISRA, 2001.

which can have a damaging effect on individuals and their participation levels.¹²

With regard to leisure research, limited access to resources is a commonly cited constraint among racially and ethnically diverse groups. Access manifests itself mainly through cultural needs, transportation, and suitable activities.

5.7 Evidence of impact of policy on Age (Consider each age group – Under 16, 16-25years, 26-65 years and 65+)

Table 17 shows the age composition of the population in the Derry City and Strabane District Council area as follows:

Age Profile	NI	Derry and Strabane
0-4	124382	10259
5-7	67662	5653
8-9	43625	3858
10-14	119034	10904
15	24620	2363
16-17	51440	4729
18-19	50181	4443
20-24	126013	10399
25-29	124099	10481
30-44	373947	30635
45-59	347850	28082
60-64	94290	7475
65-74	145600	10775
75-84	86724	5876
85-89	21165	1217
90+	10231	571

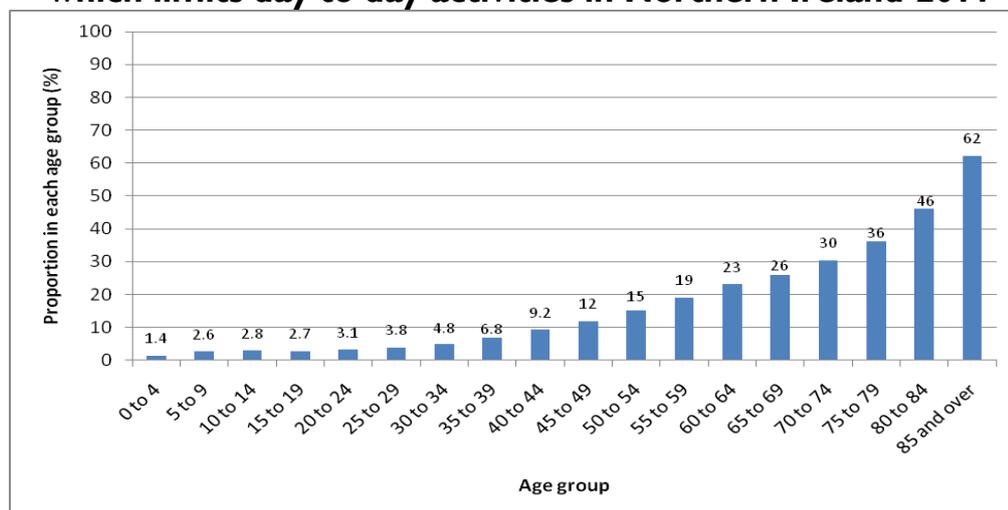
According to the “End Child Poverty” Report (October 2014) Derry and Strabane district council areas have the highest levels of child poverty (after housing costs) out of the existing 26 councils at 31.17% and 29.35% respectively

Table 18 below shows that the incidence of people having a long-term health problem or disability which limited their day-to-day activities rises continuously with increasing age. For example, whereas 1.4 per cent of those aged 0-4 had a long-term health problem or disability which limited their day-to-day activities ‘a lot’, this rises to approximately one person in fifteen (6.8 per cent) among those aged 35-39, approximately one person in eight (12 per cent) among those aged 45-49 and

¹² Prof Owen Hargie, Dr Ian Somerville, Dr David Mitchell *Social Exclusion and Sport in Northern Ireland 2015 – University of Ulster*

approximately one person in three (36 per cent) among those aged 75-79. Over three-fifths (62 per cent) of those aged 85 and over had a long-term health problem or disability which limited their day-to-day activities 'a lot' ¹³

Table 18: Incidence of persons with long-term health problems which limits day to day activities in Northern Ireland-2011



The Council offers separate prices for

- Persons between five and eighteen years of age (Child)
- Persons over eighteen years of age (Adult)
- Concessionary rates for senior citizens (persons over 65 years of age)

During the EQIA formal consultation process one of the participants questioned why Council opted for the higher qualifying age criterion for concessionary rate for older people (i.e. over 65 years as opposed to over 60 years) – If this is based on retirement age will it move from 65 to 66/67 and even 68 to keep in line with this criteria – Feedback shows that some service users believe that this is a grave injustice to the older members of our community and that it should be restored to 60+

Given that the concessionary rates, which Council have in place, take cognisance of the earning capacity at various ages and it is therefore considered that the pricing policy would have a differential impact in terms of age.

¹³ http://www.nisra.gov.uk/census/detailedcharacteristics_stats_bulletin_2011.pdf

5.8 Evidence of impact of policy on Men and Women (including boys, girls, transgendered and transsexual people)

Table 19 below shows the gender breakdown of residents in the Derry City and Strabane District Council area according to the Census 2011 data.

Table 19: Gender Profile of Derry City & Strabane District Council

LGD	Male	Female
Northern Ireland	887323	923540
Derry and Strabane LGD	72475	75245

According to the DCALNI report on “Experience of sport and physical activity by adults in Northern Ireland” for 2013/14 men were more likely to state that there was nothing that acted as a barrier to sports club membership (22%) than women (16%).

Leisure prices do not have a differential impact on people of different genders as they are applied consistently across all genders however other factors such as programming or activities offered are having an impact on the user profile of facilities.

5.9 Evidence of impact of policy on People with/without a disability

- **People with/without a Learning disability**
- **People with/without a sensory disability**
- **People with/without a physical disability**

According to the 2011 Census 22.95% of people in the Derry and Strabane LGD have a long-term health problem or disability that limits their day-to-day activities See Table 20 below;

Table 20: Incidence of persons with long-term health problems which limits day to day activities in new Council area-2011

	All usual residents	Day-to-day activities limited a lot	Day-to-day activities limited a little	Day-to-day activities not limited
Northern Ireland	1810863	215232 (11.89%)	159414 (8.8%)	1436217 (79.31%)
Derry and Strabane	147720	20710 (14.02%)	13193 (8.93%)	113817 (77.05%)

As part of the formal EQIA consultation process Council received specific comments with regards to cost barriers for people with a disability. These can be summarised as follows:

- Regarding people with disabilities one respondent agreed with a means tested system for concessions however would point out that many people with disabilities in employment are on low incomes due to the nature of jobs and cognisance must be taken of this disadvantage by the Council to ensure equality of opportunity for all.
- Additionally, there is a need for some people with disabilities to be offered concessionary rates. Various studies show that families with a disabled member may have higher outgoings and expenses. Individuals with a disability may also encounter higher living expenses, for example needing to use a taxi where public transport is unsuitable and the fact that fares are higher for suitably modified taxis.
- Disability Action believes that concessions for disabled people should be based on the ability to pay and should therefore be available to those with a disability who are in receipt of certain state benefits or are financially dependent on someone who themselves qualify for the service at a concessionary rate, for example, a senior citizen.
- Where a disabled person may, for reasons related to their disability, be prevented from gaining full and equal access to a service or building, or from fully participating in an event, it should be recommended that a concessionary rate be available.
- A service user with a disability stated that he did expect a reduced rate from other users who do not have a disability due to the limitations of what he can use – The service user would like the gym membership fee to be reviewed to reflect what can be used within the facilities

People with mental health problems tend to have significantly higher rates of long-term physical health problems. There is also some evidence to suggest that obesity may be more prevalent among disabled people.

People with learning disabilities may experience a risk of dementia because of premature ageing. People with Down's syndrome have an increased genetic risk of developing dementia.

In terms of employment the latest figures show that just over a third (37.6%) of disabled persons are in employment compared to 74.7% of non-disabled persons. Only about one fifth of people with mental ill-health or learning disability are in employment, despite the fact that research in the USA suggests that up to 58% of adults in this category are able to work.

The Poverty Site - Poverty is based on a household's income level. A much higher proportion of families receive DLA or AA in NI (20 per cent) than in the rest of GB (13 per cent). The DWP (2013)¹⁴ report states that disabled people are more than twice as likely as non-disabled people to experience material deprivation, as measured by indicating which goods they cannot afford on a deprivation scale.

¹⁴ Department for Work and Pensions (2013) Fulfilling Potential: Building a deeper understanding of disability in the UK today. London: Department for Work and Pensions.

Twice the proportion (12%) of disabled adults live in persistent poverty compared to non-disabled adults (6%). Persistent poverty is defined as spending three or more years, out of any four-year period, in a household with an income below 60% of median income (DWP 2013).

Research carried out by the University of Ulster also cited cost as one of the barriers facing individuals with disabilities. Persons with disabilities noted that ‘membership and transportation costs are the primary economic barriers directly affecting their ability to access recreation and fitness facilities’. This was often accentuated by having ‘fewer economic resources compared to their non-disabled counterparts’.¹⁵

As a result of these data, it is clear that people with disabilities would be proportionately more likely to be entitled to access concessionary rates. It is noted that some Councils within the region give concessionary rates/free access to carers accompanying people with a disability when using Council facilities so as to enable them to participate and enjoy the activity.

In overall terms the Leisure Pricing Policy may have a potential differential impact on this s75 grouping depending on the implementation of concessionary rates.

5.10 Evidence of impact of policy on People with/without dependants

According to the 2011 Census 37.65% of households in the Derry and Strabane LGD have a dependants as compared to the Northern Ireland average of 33.85% households – See Table 21 below;

Table 21: People with Dependants in Derry City and Strabane District Council area

	All households	Married or in a registered same-sex civil partnership couple: Dependent children	Cohabiting couple: Dependent children	Lone parent: Dependent children	With dependent children
Northern Ireland	703275	138677 (19.72%)	16186 (2.3%)	64228 (9.13%)	18980 (2.7%)
Derry and Strabane	55596	10370 (18.65%)	1097 (1.97%)	7284 (13.1%)	2187 (3.93%)

There is a significant proportion of one parent families (13.1%) who reside in the Derry City and Strabane District Council area – affordability may be a factor in

¹⁵ Prof Owen Hargie, Dr Ian Somerville, Dr David Mitchell **Social Exclusion and Sport in Northern Ireland 2015 – University of Ulster**

their ability to participate in the Council leisure services - the findings from the DCAL research “Barriers to Participation in Culture Arts and Leisure – Final Report” supports this as it highlighted that service providers should consider reducing the cost of services in order to encourage participation by groups such as families, the elderly, those on low incomes and the unemployed.

At present the Council has identified ‘family membership’ in certain instances as 2 adults and 2 children but the application of this concession is not uniform as for example in the heritage and museum service where a family pass is for 2 adults and 3 children.

Sport NI raised an issue stating that it was recognised that there is a drop in participation in sports after children are born. Whenever a busy lifestyle becomes hectic, people have less time for themselves. They also face the additional problems of getting childcare and crèche facilities and finding the personal space to get out and be active. [This point is linked to the issue of women not prioritising themselves and being reluctant to devote time and money to their own well-being.¹⁶

Difficulties with the actual cost of accessing provision seemed to be particularly applicable to people on relatively low incomes, but just above the eligibility threshold for exemptions or concessions. For example, parents on low incomes said that they found it difficult to take the whole family to leisure centres since the entrance costs mount up when there are 4 or 5 people.¹⁷

The census data above highlights that there is a significant number of lone parents in Northern Ireland and the concessionary ‘family pass’ may have a potential differential impact on this grouping.

There is therefore a large target audience for increasing the participation of under-represented groups by providing high quality, accessible and affordable facilities and activities.

Council have made provision for carers to avail of concessionary rates where they are fully involved in assisting a disabled person to participate in a leisure activity and gains no benefit from the activity themselves.

¹⁶ http://archive.niassembly.gov.uk/culture/2007mandate/reports/report73_09_10r.htm#footnote-323133-44-backlink

¹⁷ <http://www.ofmdfmni.gov.uk/barriers.pdf>

5.11 Evidence of impact of policy on Marital Status

Table 22 below illustrates the marital status profile of the Derry and Strabane LGD:

Table 22: Marital Status Profile of Derry City and Strabane District Council area.

Marital Status	Derry and Strabane LGD	NI
All usual residents: Aged 16+ years	83663	1431540
Single (never married or never registered a same-sex civil partnership): Aged 16+ years	46326 (40.39%)	517393 (36.14%)
Married: Aged 16+ years	49218 (42.92%)	680831 (47.56%)
In a registered same-sex civil p'ship: Aged 16+ years	93 (0.08%)	1243 (0.09%)
Separated (but still legally married or still legally in a same-sex civil p'ship): Aged 16+ years	5886 (5.13%)	56911 (3.98%)
Divorced or formerly in a same-sex civil partnership which is now legally dissolved:	6179 (5.39%)	78074 (5.45%)
Widowed or surviving partner from a same-sex civil partnership: Aged 16+ years	6981 (6.09%)	97088 (6.78%)

Leisure charges are fixed regardless of this s75 grouping and will thus have no differential impact on this category.

5.12 Sexual Orientation

Analysis of the Census 2011 indicates that between 2% and 10% of the population may be lesbian, gay or bisexual.

There are no official statistics in relation to the number of gay, lesbian or bisexual people in Northern Ireland. However, research conducted by the HM Treasury shows that between 5% - 7% of the UK population identify themselves as gay, lesbian, bisexual or 'trans' (transsexual, transgendered and transvestites) (LGBT). This is a sizeable proportion of the population here in Northern Ireland.

Research commissioned by the UK Sports Councils in 2009¹⁸ concluded that there is no reliable evidence to allow analysis of the extent to which Lesbian Gay and Bisexual (LGB) people undertake different levels of sports participation but that there was anecdotal evidence that non-

¹⁸ 2 A systematic review of the literature on Black and Ethnic Minority Communities in Sport and Physical Education, 2009

inclusive attitudes, homophobia and self-censorship exist. This is supported by research carried out by University of Ulster whereby it was found that many LGB people face significant obstacles to engaging in sport and leisure – this related mainly to perceptions and attitudes rather than cost or accessibility. Testimony from LGB interviewees confirmed existing research regarding the gendered nature of certain team sports and how this can create a culture which is conducive to homophobia. Moreover, LGB interviewees reported that open plan changing rooms and showers were intimidating places, in part because they afforded no privacy and in part because they lent themselves to bullying. Almost one in five (19%) of the survey respondents said they would feel uncomfortable using a changing room at the same time as a gay or lesbian person.¹⁹

It is noted that when considering the definition of ‘family pass’ Council must be mindful to be inclusive so as not to have an adverse impact on this category. Council must also ensure that when the concessionary ‘couple’ rate which is in place within the fitness suites across the leisure centres that the definition of ‘couple’ extends to same-sex partners.

5.13 Evidence of impact on Good Relations

The Leisure Pricing Policy aims to arrive at a scale of charges for its services, which is consistent, fair and equal to all its residents and visitors, with no adverse impact on any section of its community. There has been no feedback from the formal EQIA consultation process which conflicts with the aims of this policy in terms of impact on Good Relations.

5.14 Evidence of impact on sustainable development

The long-term financial sustainability of Derry City and Strabane District Council is dependent on the optimisation of available opportunities for the generation of income. Wherever possible this optimisation is achieved by the setting of discretionary fees and charges for services provided in a fair and equal manner so as to provide value for money for the service user whilst recouping a reasonable proportion of the Council’s expenditure.

5.15 Summary of Impacts

The EQIA process has identified that a number of Section 75 groupings have different barriers to participation in sports and leisure activities, albeit to varying degrees. The groups potentially affected by pricing/cost barriers are;

- Age
- People with/without a disability
- People with/without dependants

¹⁹ Prof Owen Hargie, Dr Ian Somerville, Dr David Mitchell **Social Exclusion and Sport in Northern Ireland 2015 – University of Ulster**

5.13 Evidence of impact on Good Relations

The Leisure Pricing Policy aims to arrive at a scale of charges for its services, which is consistent, fair and equal to all its residents and visitors, with no adverse impact on any section of its community.

5.14 Evidence of impact on sustainable development

The long-term financial sustainability of Derry City and Strabane District Council is dependant on the optimisation of available opportunities for the generation of income. Wherever possible this optimisation is achieved by the setting of discretionary fees and charges for services provided in a fair and equal manner so as to provide value for money for the service user whilst recouping a reasonable proportion of the Council's expenditure.

5.15 Summary of Impacts

The EQIA process has identified through primary and secondary research that this policy may impact on a number of Section 75 groupings, albeit to varying degrees. The groups potentially affected are;

- Racial Grouping
- Age
- Marital Status
- Gender
- Sexual Orientation
- People with/without a disability
- People with/without dependants

6.0 Consideration of Measures to Mitigate any Adverse Impact

- 6.1** The Council has committed to applying concessionary prices for the following categories which it is felt may mitigate against some of the adverse impacts in relation to its Sports and Leisure Pricing Policy (See Appendix 3 for full details):
- **Under 5's (Free Swimming)**
 - **Under 18's**
 - **Full time Student**
 - **Over 65's (Free Swimming and Health Suite)**
 - **Off Peak**
 - **Economically Disadvantaged/User with a disability**

7.0 Conclusions

- 7.1 Derry City and Strabane District Council has carefully considered the findings of the research and consultation. As a result the Council has concluded that the data collated indicates that this final equality impact assessment report has identified potential differential impacts in relation to the aforementioned Section 75 groups in terms of the provision or non-provision of concessionary rates.
- 7.2 With this in mind it is felt that the steps taken to mitigate against the identified adverse impact

8.0 Monitoring

The EQIA process raised issues and it is hoped that the mitigating measures will have minimised those adverse impacts identified. However Council will collate quantitative and qualitative data on a periodic basis so as to monitor the impacts of this policy.

9.0 Publication of the Results of the Equality Impact Assessment

- 9.1 A summary of the key findings of the EQIA including consultation results were presented to elected members in February 2016 to help inform decision-making.
- 9.2 A copy of the final Equality Impact Assessment Report will be forwarded to all those who took part in the consultation exercise, upon request.
- 9.3 The final Equality Impact Assessment Report will also be made available through the Council's web-site : www.derrystrabane.com and on request, in any format.

NAME	ADDRESS 1	ADDRESS 2	TOWN	POSTCODE
Action on Hearing Loss	Embassy Building	3 Strand Road	DERRY	BT48 7BH
Action on Hearing Loss NI	Harvester House	4-8 Adelaide Avenue	BELFAST	BT2 8GA
Active Citizens Engaged	c/o 11 Manning Way	Waterside	DERRY	
African Caribbean Group	One World Centre	4 Shipquay Street	DERRY	
Age NI	3 Lower Crescent		BELFAST	BT7 1NR
All Saints Caring Assoc.	21 Glendermott Rd	Waterside	LONDONDERRY	BT47 6BB
Alliance Party of NI	88 University Street		BELFAST	BT7 1HE
An Munia Tober	12/2 Balckstaff Complex	77 Springfield Road	BELFAST	BT12 7AE
Ancient Order of Hibernians	23 Foyle Street		DERRY	BT48 6AL
Apprentice Boys of Derry	Memorial Hall	Society Street	LONDONDERRY	BT48 6PJ
Autism Northern Ireland (PAPA)	Donard, Knockbracken Healthcare Park	Saintfield Road	BELFAST	BT8 8BH
Aware Defeat Depression	Philip House	123-137 York Street	BELFAST	BT15 1AB
Baha' I Faith	Baha'I Centre	5 Clarendon Street	DERRY	BT48 7EP
Ballymacgroarty and Hazelbank Community Partnership	19 Merriman Court	Ballymagroarty	DERRY	BT48 02G
Ballymagroarty Community Assoc/Youth Assoc.	Ballymagroarty Community Centre	Shaw Court	DERRY	
Belfast Islamic Centre	5 Fortwilliam Gardens		BELFAST	
Bob Harte Memorial Trust	16-18 George's Street		LONDONDERRY	BT48 6RP
Bridge Accessible Transport	58 Strand Road		DERRY	BT48 7AJ
NAME	ADDRESS 1	ADDRESS 2	TOWN	POSTCODE
CALMS	12 Asylum Road		DERRY	BT48 7DX
Cancer Focus Northern Ireland	40 - 44 Eglantine Avenue		BELFAST	BT9 6DX
Cara Friend	9-13 Waring Street		BELFAST	BT1 2DX
Carers National Association	58 Howard Street		BELFAST	BT1 6PJ

Equality Impact Assessment (EQIA) Consultation Response

Sports and Leisure Pricing Policy		
Name of Respondent	Comments	Action Taken/Response
Catherine O'Donnell, Off the Streets Youth Community Initiative	Are Concessionary rates still in existence as they have been invaluable in getting the group users to use numerous activities in TSC? – Previously have received school rates and whilst they accept that they do not fit into the 'school' category they would like to see a concessionary category for community/voluntary groups.	<ul style="list-style-type: none"> • Concessionary rates are available as per concessionary summary sheet. (Appendix 1) • There is not a specific concession category for community and voluntary groups • Current prices are heavily subsidised/discounted by council with community and voluntary groups being able to avail of non-commercial rates currently set well below market values. (Appendix 2) • Any additional discounts for these groups would have a significant impact on the sustainability of facilities and services due to the significant amount of Non Commercial user groups currently using facilities. (Appendix 3) • If an additional subsidy/discount was applied it is anticipated that this may lead to general public bookings being able to become categorised (simply by booking under a club/community name) further impacting on the sustainability of service and facilities. • The new pricing policy has an off peak rate that is discounted at 25% from the already subsidised peak rate. Over 70% of non-commercial (including community and voluntary groups) use our facilities at off peak times and therefore receive a discount on already subsidised rates. (Appendix 4)

		<ul style="list-style-type: none"> • Value for money membership packages have been introduced and are available for all users, including vouchers and discounted corporate memberships are also available. • In the interests of alignment, the majority of prices in the Derry City area have decreased since the new pricing policy was implemented in April 2015. E.g. No Off peak rates previously and therefore a Main Hall was £36.30 and is now 28.50 off Peak. Gym admission was £5.15 and is now £3.57 Off Peak and £5.00 Peak. Child swim was £2.10 and is now £1.45 Off Peak and £1.90 Peak. • A number of community facilities are availed of as alternatives to Council Leisure Facilities.
<p>Catherine O'Donnell, Off the Streets Youth Community Initiative</p>	<p>The whole ethos of Council is to have facilities suitable for use by the residents within the community – given that we are living in one of the most deprived areas in Northern Ireland with high rates of economic inactivity then you are in some ways discouraging the use of these facilities as prices are too expensive – as community groups we are endeavouring to improve the confidence, health and wellbeing of young people and attending activities in the Council's Sports Complex is core to the work we do - not being able to afford to carry out some of our programmes would be damaging to our young people.</p>	<ul style="list-style-type: none"> • According to price comparison surveys carried out prior to implementation of the pricing policy, Derry City & Strabane District Council have one of the lowest local government and private sector schedule of charges in Northern Ireland. • The new pricing policy has an off peak rate that is discounted at 25% for all users. • The new pricing policy has an off peak rate that is discounted at 25% from the already subsidised peak rate. Over 70% of non-commercial (including community and voluntary groups) use our facilities at off peak times (see Appendix 1) and therefore receive a discount on already subsidised rates. • In the interests of alignment, the majority of prices in the Derry City area have decreased

		<p>since the new pricing policy was implemented in April 2015. E.g. No Off peak rates previously and therefore a Main Hall was £36.30 and is now 28.50 off Peak. Gym admission was £5.15 and is now £3.75 Off Peak and £5.00 Peak. Child swim was £2.10 and is now £1.45 Off Peak and £1.90 Peak.</p> <ul style="list-style-type: none"> • Value for money membership packages have been introduced and are available for all users, including vouchers. Corporate memberships are also available for groups of 10+ • Current prices are heavily subsidised by council.
<p>Catherine O'Donnell, Off the Streets Youth Community Initiative</p>	<p>On subject of prices for activities being a part of funding applications – The current economic climate has resulted in a reduction in funding across all areas and even when funding is successful it may not be the full amount – this together with the fact that any application for funding would have been based on rates that group have always received – all of these elements means that fewer group members will be put through the various training activities – this will impact immensely – ultimately this will result in a loss of revenue for Council</p>	<ul style="list-style-type: none"> • External funding is a separate issue. • In the interests of alignment, the majority of prices in the Derry City area have decreased since the new pricing policy was implemented in April 2015. E.g. No Off peak rates previously and therefore a Main Hall was £36.30 and is now 28.50 off Peak. Gym admission was £5.15 and is now £3.57 Off Peak and £5.00 Peak. Child swim was £2.10 and is now £1.45 Off Peak and £1.90 Peak. • The above point means that actually more group members could attend with the same amount of funding. • Value for money membership packages have been introduced and are available for all users, including vouchers. • Current prices are heavily subsidised by council. • The new pricing policy has an off peak rate that is discounted at 25% from the already subsidised

		<p>peak rate. Over 70% of non-commercial (including community and voluntary groups) use our facilities at off peak times and therefore receive a discount on already subsidies rates.</p>
<p>Lisa Moore, Glen Development Trust /Outer West Neighbourhood Partnership</p>	<p>Youth rate has still increased – current participation has increased although it is likely this situation will change due to increase in prices.</p>	<ul style="list-style-type: none"> • In the interests of alignment, the majority of prices in the Derry City area have decreased since the new pricing policy was implemented in April 2015. E.g. No Off peak rates previously and therefore a Main Hall was £36.30 and is now 28.50 off Peak. Gym admission was £5.15 and is now £3.75 Off Peak and £5.00 Peak. Child swim was £2.10 and is now £1.45 Off Peak and £1.90 Peak. • Interventions and initiatives such as Teen Gym, return to sport initiatives are also in place at a discounted rate of £2.00 per head which any groups can avail of and are cheaper than previous. • Concession rates for under 18s and off peak swimming is actually cheaper than previous youth swimming card rate (was £1.68 now £1.45)

<p>Lisa Moore, Glen Development Trust /Outer West Neighbourhood Partnership</p>	<p>In terms of funding – both groups access Council funding for many of its activities and even then they do not get 100% of the amount applied for - so Council are funding the groups to pay it back to them in admittance charges – they are in effect reducing the number of people able to use the facilities.</p>	<ul style="list-style-type: none"> • Funding is a separate issue. • Value for money membership packages have been introduced and are available for all users, including vouchers. • The new pricing policy has an off peak rate that is discounted at 25% from the already subsidised peak rate. Over 70% of non-commercial (including community and voluntary groups) use our facilities at off peak times and therefore receive a discount on already subsidies rates. • The above point means that actually more group members could attend and the same amount of funding. • Current prices are heavily subsidised by council.
<p>Michael Hutton, Derry and District Football Association</p>	<p>How did Council arrive at the concessionary rate – why 75% and not 60% or 50% for example. The increase should be reflective of people’s incomes – is this based on any precedence.</p>	<ul style="list-style-type: none"> • Council services are already heavily subsidised and according to price comparison surveys carried out prior to implementation of the pricing policy, Derry City & Strabane District Council have one of the lowest local government and private sector schedule of charges in Northern Ireland. Taking this into consideration, a discount of 25% was considered reasonable and value for money. • In the interests of alignment, the majority of prices in the Derry City area have decreased since the new pricing policy was implemented in April 2015.

Michael Hutton, Derry and District Football Association

Previously there was a concessionary rate for the Over 60's in DCC facilities – this was for Over 65s in Strabane – why did DCSDC opt for the higher qualifying age criteria given that Derry has a greater population than Strabane – this again will have an impact on a vulnerable group. You say this is based on retirement age however this has shifted from 65 to 66/67 and even 68 in some cases so will this qualifying criteria move also - This is a grave injustice to the older members of our community – it should be restored to 60+

- Previously the concessionary rates for older adults was over 60s in both council areas however swimming only was free of charge in Derry.
- Older people have had to respond to changes in employment legislation, and their own needs in relation to personal finances, by working longer.
- Many older people also want to work beyond traditional retirement age, and so remain in work for this reason.
- Although the number of people working past the traditional pension age is relatively low, a report by the Commissioner for Older People found that this number is increasing, and will continue to increase, as many older people stay in work longer.
- According to the 2011 Census in Northern Ireland there has been a 10% increase in economic activity for those 60-64 years old (2001 – 31% of 60-64 year olds were economically active and in 2011– 41% of the 60-64 year old age group were economically active) – with this in mind Council felt that the concessionary rate for those people at 65+ was appropriate. See attached comparison. (Appendix 5)
- The policy will be reviewed on an ongoing basis and aligned as required. (Appendix 6)
- The new pricing policy has an off peak rate that is discounted at 25% for all users and over 60s are now paying less for activities such as gym usage, badminton and table tennis.

		<ul style="list-style-type: none"> • Current prices are heavily subsidised by council. • Value for money membership packages have been introduced and are available for all users, including vouchers. • In the interests of alignment, the majority of prices in the Derry City area have decreased since the new pricing policy was implemented in April 2015.
<p>Keith Wright (A.C.E., Interfaith forum, Mormon Church, Foyle F.U.C.)</p>	<p>Everyone has to pay for facilities – voluntary groups have supported Council and have put money into their facilities – they are non-profit making groups working for the community – they should get concessionary rates.</p>	<ul style="list-style-type: none"> • Current prices are heavily subsidised/discounted by council with community and voluntary groups being able to avail of non-commercial rates currently set well below market values. • Any additional discounts for these groups would have a significant impact on the sustainability of facilities and services due to the significant amount of Non Commercial user groups currently using facilities. • If an additional subsidy/discount was applied it is anticipated that this may lead to general public bookings being able to become categorised (simply by booking under a club/community name) further impacting on the sustainability of service and facilities. • The new pricing policy has an off peak rate that is discounted at 25% from the already subsidised

		<p>peak rate. Over 70% of non-commercial (including community and voluntary groups) use our facilities at off peak times and therefore receive a discount on already subsidies rates.</p> <ul style="list-style-type: none"> • Value for money membership packages have been introduced and are available for all users, including vouchers and discounted corporate memberships are also available. • In the interests of alignment, the majority of prices in the Derry City area have decreased since the new pricing policy was implemented in April 2015. E.g. No Off peak rates previously and therefore a Main Hall was £36.30 and is now 28.50 off Peak. Gym admission was £5.15 and is now £3.57 Off Peak and £5.00 Peak. Child swim was £2.10 and is now £1.45 Off Peak and £1.90 Peak. • A number of community facilities are availed of as alternatives to Council Leisure Facilities
	<p>On an individual level the prices are very good however when you are dealing with a group situation with limited financial resources this will impact on participation levels.</p>	<ul style="list-style-type: none"> • Groups can avail of off peak pricing for group activities such as 5-aside etc., corporate membership are available to groups of 10 or more. • Constituted groups have the opportunity to access both council and external funding to support leisure and sport based programmes.

Disability Action

Regarding consideration of available data and research Disability Action notes that all primary and secondary research is limited to quantitative data on the 9 groups listed under Section 75.
In particular, the secondary research is generic and was carried out at least 8 years ago.
Disability Action believes that the dated research and complete lack of qualitative information renders this essential element of the EQIA process seriously flawed. (Item 5.1, page 15)

Regarding evidence of impact the Council states that it is particularly keen to hear views on how the Leisure Pricing Policy could promote greater equality of opportunity for people across the 9 categories listed under Section 75. Whilst welcoming Disability Action would advise that it is most likely that representative organisations will respond to this consultation. Disability Action would ask what the Council's plans are in regard to consulting with individuals within the 9 groups listed under Section 75 to enable informed comment to be made. (Items 5.5 – 5.12, pages 18 – 26)

- Council are aware of these issues and due to time constraints during the transition period there was no opportunity to carry out the pre-development consultation. However Council had hoped that this formal consultation process would provide qualitative data to inform this policy - apart from the opportunity to put contributions in writing Council held 4 meetings across the new Council area (during the day and evenings) to accommodate consultee feedback.

- As previously stated Council have held 4 meetings to accommodate consultee input into this process - we have had input from individual service users as well as organisations. Service users have given feedback to staff both verbally and via email.

Disability Action (contd)	Regarding people with disabilities Disability Action agrees with a means tested system for concessions however would point out that many people with disabilities in employment are on low incomes due to the nature of jobs and cognisance must be taken of this disadvantage by the Council to ensure equality of opportunity for all.	<ul style="list-style-type: none"> • There are concessionary rates for economically disadvantaged, of which individuals on low income, including people with disabilities, can access off peak, including 25% discount on membership packages which are already considered value for money and based on an already heavily subsidised service. We will make this more transparent in the economically disadvantaged category of the concession summary.
	Additionally, there is a need for some people with disabilities to be offered concessionary rates. Various studies show that families with a disabled member may have higher outgoings and expenses. Individuals with a disability may also encounter higher living expenses, for example needing to use a taxi where public transport is unsuitable and the fact that fares a higher for suitably modified taxis.	<ul style="list-style-type: none"> • There are concessionary rates for economically disadvantaged, of which individuals on low income, including people with disabilities can access off peak, including 25% discount on membership packages which are already considered value for money and based on an already heavily subsidised service. We will make this more transparent in the economically disadvantaged category. • Transportation to facilities is a separate issue.

	<p>Disability Action believes that concessions for disabled people should be based on the ability to pay and should therefore be available to those with a disability who are in receipt of certain state benefits or are financially dependent on someone who themselves qualify for the service at a concessionary rate, for example, a senior citizen.</p>	<ul style="list-style-type: none"> • There are concessionary rates for economically disadvantaged, of which individuals on low income, including people with disabilities can access off peak, including 25% discount on membership packages which are already considered value for money and based on an already heavily subsidised service. We will make this more transparent in the economically disadvantaged category.
	<p>Where a disabled person may, for reasons related to their disability, be prevented from gaining full and equal access to a service or building, or from fully participating in an event, it should be recommended that a concessionary rate be available. Additionally, a concessionary rate should also be available for essential carers, regardless of their income.</p>	<ul style="list-style-type: none"> • There are concessionary rates for economically disadvantaged, of which individuals on low income, including people with disabilities can access off peak, including 25% discount on membership packages which are already considered value for money and based on an already heavily subsidised service. We will make this more transparent in the economically disadvantaged category. • Where a customer requires a carer to provide assistance to allow them to use/participate in activities within our facilities, access to that carer will be free of charge. • Where the customer only requires the carer to transport them/accompany them to the facility, the carer will be required to pay the appropriate rate for any activities they wish to participate in.

Disability Action (contd)	Disability Action would advise the Council that people with Down Syndrome is the appropriate term and requests that this error be addressed within in the document. Disability Action would also recommend Disability Equality Training for Council staff. (Item 5.9, page 22)	<ul style="list-style-type: none"> • The reference in question was taken directly from Department for Work and Pensions (2013) Fulfilling Potential: Building a deeper understanding of disability in the UK today. London: Department for Work and Pensions. • However as suggested the reference has been amended and a review of all training needs across the service will be completed.
	To ensure equality of opportunity for all and given Disability Action's comments at paragraphs 11 – 14 above Disability Action strongly advocates that people with disabilities be added to the list of groupings identified for concessionary rates. (Item 6.2, page 28)	<ul style="list-style-type: none"> • There are concessionary rates for economically disadvantaged, of which individuals on low income, including people with disabilities can access. • Off peak, including 25% discount on membership packages which are already considered value for money and based on an already heavily subsidised service. We will make this more transparent in the economically disadvantaged category.
Mrs Angela McNutt - Tel No: 07821072863	She feels she has no forewarning about this increase and is finding the current price financially straining for 3 children and would like to talk to you regarding this issue.	<ul style="list-style-type: none"> • Family swims price to be considered for peak times.

<p>Mr Eddie Boyle 6 Ardnalee Park Strabane BT82 9DZ - Tel: 02871884893</p>	<p>Mr Boyle highlighted that for many years he has paid £5 per month for use of the gym as he could only use 2 pieces of equipment due to his disability and he had to use disability toilets for changing area - this price has now been significantly increase due to the pricing review to £18.75 per month. Whilst Mr Boyle feels that an increase was expected he did expect a reduced rate from other users who do not have a disability due to the limitations of what he can use - this situation has not changed - Mr Boyle would like his gym membership fee to be reviewed to reflect what he can use within the facilities</p>	<ul style="list-style-type: none"> • Advice was sought from ECNI (Kevin Oakes) - Council was advised that as long as the gym and its equipment was accessible for anyone choosing to use it then Council are within their rights to charge an appropriate fee. It is noted that people without a disability may choose to only use one piece of equipment and yet have to pay the full price. On this occasion Council need to examine accessibility and options for Mr Boyle to use other equipment should he choose to do so.
<p>Riversdale Otters Swim Club</p>	<p>Following a meeting with the Committee primarily regarding the fee structure we are gravely concerned as to the impact this shall have on the future sustainability of the Club. We feel that the matter needs further discussion and thereafter a meeting with yourself and possibly local Council representatives. It is important that Otters members are treated fairly and equally particularly in relation to other Clubs within the Council area and we would ask for your co-operation in this matter.</p>	<ul style="list-style-type: none"> • There has been minimal change in the club pool hire price in Strabane (£49.35 to £52 per hour for toddler and main pool) a significant decrease in the Derry area (£82.00 to £52 per hour for toddler and main pool). • The pricing policy applies to all sports clubs and groups and the new policy is for the new Council and this should transcend any individual historical discount agreements with organisations from previous legacy Councils. • Current prices are heavily subsidised by council. • Accessibility to facilities is a separate issue.

Commercial Rate

The 300% Commercial Rates are unreasonable and preventing organisations from hiring facilities, even when facilities are not being used.

A review of the current Commercial rate has been completed and it is anticipated going forward there will be alternative options for commercial booking including Start Up prices for set periods and income share options as an alternative to the 300% increase on Non Commercial rate options. (See Appendix 7)

Appendix 3

Concession Pricing Summary Concession Category	Eligibility	Restrictions	Evidence/Proof Required (When appropriate)
1. Free of Charge Use	Children aged 0 – 4 years (under 5 years, until 5 th birthday) Adults aged 65 years and over (Adults who have reached state pension age, only eligible on their 65 th birthday)	Only applies to swimming pool and health suite access. Normal admission polices apply	Proof of age required in the form of a drivers licence, passport, electoral card or birth certificate.
2. Child/Junior/Over 65	Children/Juniors aged 5 – 17 (under 18 years, until 18 th Birthday) Those aged 65 and over.	Only applies to concessions outlined in the schedule of charges Normal admission polices apply	Proof of age required in the form of a drivers licence, passport or birth certificate.
3. Full Time Student	Must be in Full Time tertiary education	Only applies to concessions outlined in the schedule of charges Normal admission polices apply	Photographic Identification in the form of a Full Time Student Pass which must be for current student year. For Example: A: Dated 2014/15 will be accepted until August 2015 B: Dated 2015/16 will be accepted until August 2016
4. Off Peak	All user before 5:00pm, Monday to Friday and all day on Sundays.	Only applies to pay and play access and facility hire including synthetic pitches as outlined in the schedule of charges. Excludes classes, courses and grass pitches.	No proof required; Applies to all users.
5. Economically Disadvantaged	Users who may be in receipt of one of the following benefits: Jobseekers Allowance Income Support Employment and Support Allowance Housing Benefit Working Tax Credit Personal Independence Payment	Excludes the following benefits: Child Tax Credits Guardians Allowance Attendance Allowance Pension Credit Maternity Allowance War Widows Pension	Must be able to and an original 'Letter of Entitlement' from the appropriate government department, and this letter must be dated within 30 days of the concession membership being taken out. Photographic ID required. Membership will only last 6 months and individuals must produce a new 'Letter of Entitlement' in order to renew concession membership.