

<b>ARMAGH BANBRIDGE CRAIGAVON DISTRICT COUNCIL</b>	
<b>Document Reference Number:</b>	<b>SC/P6.0/V1.0</b>
<b>Title of Policy:</b>	<b>Concession Policy Leisure Services</b>
<b>No of Pages (including appendices):</b>	<b>18 (including policy screening)</b>
<b>Version:</b>	<b>Version 1</b>
<b>Issue Date:</b>	<b>1 April 2015</b>
<b>Policy Nominated Officer:</b>	
<b>Equality screened by:</b>	<b>Stephanie Harte (Policy Development Officer – Craigavon Borough Council)</b>
<b>Equality screening date:</b>	<b>October 2014</b>
<b>Amendment Version</b>	
<b>Issue Date:</b>	
<b>Sent out by:</b>	
<b>Approved by:</b>	<b>Services Committee meeting 5 November 2014 Item 5.2</b> <b>Adopted by Council 18 December 2014</b>
<b>Review Date:</b>	

#### **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**

In the Corporate Strategy the Armagh Banbridge Craigavon Council has identified the goal to actively engage in an inclusive manner with local communities. They want young people to realise their full potential and to provide a safe and affordable place for families and older people. The Council wants to recognise the importance of providing high quality Health and Wellbeing services and to encourage all citizens to fully utilise its facilities.

The "Making Life Better" report published by the Executive in July has brought together much of the recent research which demonstrates that "health to a larger extent is affected by economic, social and environmental factors". This document identified Councils as a key partner to deliver a reduction in Health Inequalities in a number of Outcomes focused on Older People and Children and Young People.

Leisure Services can play an important role in ensuring that Older People experience a high quality of living and social integration and minimise the risks of isolation. The participation of young people in sport and physical activity is similar and enables them to benefit from lifelong participation.

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 and their carers	Receipt of Disability Living Allowance (DLA) or holder of a 'Blue Badge'	Disability
Unemployed People	Those in receipt of Job Seeker Allowance, Income Support Employment and Support Allowance	N/A

The recommended procedure is that unemployed people should make a declaration (subject to proof as above) and this “unemployed” status will remain on record systems for 2 calendar months –the user will be required to repeat the declaration and proof process every two months.

### **Proposed Concessionary Rate**

Research has been carried out to determine the average % concession which is applied across 10 Councils’ leisure facilities across Northern Ireland, by comparing the published concessionary price with the price of that activity for a (non-concessionary) adult (Appendix A).

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 who are required to directly accompany a disabled person as a necessary aid to help the disabled person carry out their activity

### **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 is more problematic and receipt of Disability Living Allowance has been used previously as evidence of disability and Disability Action NI have advised that this method remains the best and most up to date way of determining eligibility. The Jobs and Benefits Office has advised on the best method for confirming whether a person is unemployed or not.

### **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 councils

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 (i.e. where the carer is fully involved in assisting the disabled person and gains no benefit from the activity themselves).

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 implemented on 1 April 2015**

## Policy Screening Form

### Policy Scoping

**Policy Title:** Concession policy for ABC Council Leisure 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. This is a new policy.

**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 "Making Life Better" report published by the Northern Ireland Executive in July 2014 has brought together much of the recent research which demonstrates that "health to a larger extent is affected by economic, social and environmental factors". This document identified Councils as a key partner to deliver a reduction in Health Inequalities in a number of Outcomes focused on Older People and 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 (lone parenthood, 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>
Project team representing Armagh City & District, Banbridge District and Craigavon Borough Councils	Leisure managers and staff of new ABC council.

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

None identified. All three councils already offer concessionary rates so impact on income should not be significant and will be monitored. 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 offered by the three existing councils; 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

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

<b>2. Are there opportunities to better promote equality of opportunity for people within the Section 75 categories?</b>		
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)

<b>3. To what extent is the policy likely to impact on good relations between people of different religious belief, political opinion, or racial group?</b>		
Category	Details of Policy Impact	Level of impact (major/minor/none)
Religious belief		None
Political opinion		None
Racial group		None

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

The adoption of a standard concession rate of 65% may result in some small increase or decrease for customers from the Armagh, Banbridge and Craigavon council areas and the impact of this will be monitored and reviewed.

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
Stephanie Harte	Policy Development Officer	October 2014
Approved by	Position/Job Title	Date
Roger Wilson	Chief Executive	November 2014

**Please forward a copy of the completed form with policy attached to XXX Officer 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.**