

Falkirk Council

Title: Review of School Swimming Pools

Meeting: Falkirk Council Date: 31 January 2024

Submitted By: Director of Place Services

1. Purpose of Report

- 1.1 The purpose of this report is to update Council on the review into the secondary school swimming pools as agreed in April 2023. Specifically, this covers the costs, the income and carbon emissions currently, and proposals for increasing usage and income and reducing costs and carbon.
- 1.2 This report aligns with the 2022/27 Council Plan by supporting the strategic enabler of financial sustainability.

2. Recommendations

2.1 It is recommended that Council:

- (i) agree that a new, standardised pricing structure is adopted for the use of all school pools under Falkirk Council control; and
- (ii) agree that an update report on the success of this new income plan comes to an Executive meeting in 2025.

3. Climate Change Implications

- 3.1 Should members agree to adopt the recommendations in this report, officers' assessment is that the school pools will contribute a combined 4780 tonnes of Carbon Dioxide equivalent to the atmosphere over the next 6 years.
 - Members should note that retaining all school pools will have a detrimental effect on the Council's ability to meet its carbon reduction targets.
- 3.2 Officers will proactively take steps to ensure measures which reduce energy use are deployed consistently across all pools. For example, the more rigorous use of pool covers etc. These could have some modest benefits for the Council's carbon footprint.
 - Given the interconnected nature of the school pools within the school building, it is not possible to accurately assess the potential impact of these actions. Officers will monitor the impact of these measures.

4. Background

- 4.1 The Council's Budget report (1 March 2023) highlighted that the Council has a projected funding gap to 2026/27 of £63.7m and provided a range of budget savings proposals that identified actions that if approved would help reduce this funding deficit. These activities include transformation, improvement, service operational reductions, Council tax strategy, service concessions and borrowing requirements. Whilst the Council agreed its 2023-24 budget on 1 March 2023, a significant budget gap remains to be addressed over the period of the Financial Strategy.
- 4.2 On 23 May 2023 Council agreed for a report to be prepared which considered the full Falkirk swimming pool portfolio. This was to specifically consider how to reduce costs, increase usage and income, and reduce carbon emissions.
- 4.3 Due to the absence of the Director of Children's Services, this exercise was passed to the Director of Place Services to take forward. He established a multi-disciplinary working group of officers from across the Council to consider the best way forward.

5. Considerations

- 5.1 Since the summer, officers have conducted an extensive review across all pools in the Falkirk Council portfolio. The approach for this review included:
 - Convening a cross service working group, including specialist staff from Sport and Leisure, Childrens Services, Property, Finance and HR.
 - Direct engagement with all secondary Head Teachers, and considering the feedback submitted during the SPR process.
- 5.2 Consideration was given to the following areas;

Financial Performance

 Energy costs, Staffing cost, Chemicals and Maintenance costs, potential redundancy costs, capital investment required - annually, and over the next 5 and 10 years. Revenue – income by pool, by hour, and user group. Estimated decommissioning and refit costs. Pricing structure.

Operational

 Overall pool use, by school, by user group (Learn to Swim classes, Amateur Aquatics Clubs, public swimming, and commercial operators), combined pool capacity.

Education Data Analysis

 Head Teacher feedback, Impact on school operation, ability to accommodate an alternative PE curriculum in the absence of a pool, School Roll, SIMD, Gender, Additional Support Needs, Looked After and in Care, Free School Meal Entitlement and Geography – the proximity to an alternative pool.

- 5.3 In addition to this analysis officers were able to refer to the undernoted engagements and consultations conducted prior to the original report.
 - 11 Strategic Property Review (SPR) Engagement sessions during which the school swimming pools featured at every meeting;
 - · Parent Council Forums;
 - Individual School briefings;
 - National Swimming Organisations; and
 - Local Swimming Organisations.
- 5.4 A consultation exercise was undertaken with all secondary school Head Teachers, between September 2023 and October 2023. Considering the themes below:
 - (i) PE provision;
 - (ii) Accommodation;
 - (iii) Certification and Qualification;
 - (iv) Alternative Curriculum Requirements; and
 - (v) Relevant Information Schools wished to provide.
- 5.5 Officers identified an opportunity to streamline and standardise our bookings and pricing processes. Currently, across the 8 mainstream secondary schools, bookings are processed by four different organisations. This leads to four different prices being charged for essentially the same facility. This increases to 5 when the leisure pools are considered.
- 5.6 Currently bookings are managed by the Sport and Leisure Team Community Access to Schools, Children's Services Lets team, The Tryst Community Sports Hub, and the management companies on behalf of the Council through the Private Finance Initiative (PFI) agreements.
- 5.7 Officers also conducted analysis into the statutory requirements on local authorities for swimming lessons in schools.

The National Context

- 5.8 There is currently no statutory requirement for local authorities to provide school swimming lessons in Scotland. Instead, swimming lessons are delivered by local authorities in partnership with Scottish Swimming through the National Learn to Swim Framework.
- 5.9 The Learn to Swim National Framework provides a structure in which schemes of work for Scottish Swimming lesson programmes can be developed, and outlines objectives that seek to establish core aquatic skills and wider ranging aquatic competences.

- 5.10 Falkirk Council currently operates an extensive Learn to Swim programme across the area, with classes available at The Mariner Centre, Grangemouth Sports Complex, Bo'ness Recreation Centre, Braes High School, St Mungo's High School, Denny High School and Grangemouth High School.
- 5.11 Falkirk Council currently operate 11 pools, with Bo'ness Recreation Centre currently scheduled to close as part of the SPR process. After its closure, Falkirk would operate 10 pools. With 1 pool per 16,070 residents.
- 5.12 This places Falkirk 8th nationally against other local authorities in Scotland when the swimming pool per capita figure is considered. When considered against neighbouring local authorities, Falkirk has fewer pools per capita than Stirling and West Lothian (after its recent pools closures), and more than North Lanarkshire and Clackmannanshire.

A short briefing note, including per capita figures per pool by local authority, is contained in Appendix 1.

6 Proposals on the way forward

- Officers note the financial pressure on the Council to make significant savings over the next few years. In keeping with the decision of Council in April 2023, officers have looked to develop a strategy that seeks to generate additional income from the swimming pools to mitigate their costs and reflect the fact that Falkirk is well served in terms of swimming pool provision in comparison to other local authorities nationally.
- 6.2 During the consultation exercise and in discussions with stakeholders some scope exists for additional income generation particularly in the following activity areas:
 - Increasing income from Falkirk Councils learn to swim programme.
 - Increasing fees and charges for sports clubs and external organisations who use the pools. Prices are to be brought in line with the national average price for pool hire.
 - Historically amateur aquatics clubs have been charged significantly below the national average price for pool hire in the Falkirk school pools. (<u>Charges for sports facilities - sportscotland the national</u> agency for sport in <u>Scotland</u>)

School Pool Per Hour	£16	£84.23
School Pool 45min session – as booked	£12.50	£63.17

- Members should be aware that there is significant variance in pricing nationally, however the national average is based on responses from 22 local authorities, including all of those in Falkirk's family group for Local Government Benchmarking.
- Aligning school pool hire pricing across all Falkirk Council school pools.
- It should be noted that due to the PFI agreements, Class 98 operate commercial lets at Bo'ness Academy, Braes HS, Graeme HS and Larbert HS. The charges for these lets are set by the management company independently. When these contracts come to an end, the lets in these schools will be brought into alignment with the applicable Falkirk Council price.
- 6.3 Officers considered the income levels, by user group, along with the total number of hours allocated to each group to review the appropriate pricing recommendations which are shown in the table below. This shows that Learn to Swim delivers 83% of all income derived from the school pools, from 39% of the time, with Aquatic Club use being the least efficient user group, delivering 6% of the income, from 42% of the time. This supports the view that the Council must raise the income per hour from amateur aquatic clubs, while reinforcing the importance of continuing to develop and expand the Learn to Swim programme to maximise income.

User Group	Hours	Income 22/23	Income per hour
Learn to Swim Lessons (Falkirk Council only)	1410	£234,896.00	£166.59
Private Lessons	240	£21,700.00	£90.42
Public Swimming (Falkirk Council)	430	£7,904.00	£18.38
Amateur Aquatics Clubs	1540	£16,667.00	£10.82

The table below shows proposed prices for school pools in 24/25, and current rates.

User Group (As booked)	23/24 Fees	24/25 Fees (Proposed)
Learn to Swim Lessons (per month)	£23.35	£24.75
Public Swimming (per swim)	£4.90 - Adult £2.80 - Junior	£5.20 - Adult £3.00 Junior
Private/Commercial Lessons (per hour) (Exclusive Pool Use)	£103.50	£160.00
Aquatics Clubs (per 45min) (Exclusive Pool Use)	£12.50	£63.00

- It is anticipated that there will be a degree of rationalisation across
 the lets currently being used by the aquatics clubs as they adapt to
 the proposed pricing model. Officers note the level of income derived
 from this user group, and while we do not wish to negatively impact
 the amateur aquatics clubs, we have a degree of confidence that any
 reduction in income from the clubs would be balanced out by
 increases overall.
- Positive engagement has been held with representatives from the Tryst Community Sport hub, who recognise both the importance of the pool in Larbert HS, and the necessity to increase income to support its continued operation. An agreement in principle has been reached to align pool pricing in the Tryst with the new 'Falkirk Council' pricing.
- Feedback from senior leadership within Education has been unanimously positive, with all keen to see the revised charging structure and operation to enable pools to become more efficient to run.
- Members are asked to note that the Sport and Leisure fees and charges are now covered under devolved powers to the Director of Place. However, in recognition of the level of increase proposed in this one-off year, and the fact that Council called for a report that reviewed income, officers are keen to seek their approval.
- Sport and Leisure officers will work with colleagues from Children's Services and the Tryst, taking the appropriate steps to align pricing for school swimming pool lets booked directly.
- 6.4 Secondary Head Teachers have committed to working with Sport and Leisure Officers to strategically increase the access to the school pools at the end of the school day. Community access begins from 1800 hours midweek. With

most extra-curricular activities finishing around 1645 hours, an opportunity exists to utilise this time and increase the overall available peak time pool capacity.

- Officers will work closely with school staff to develop plans to, safely, expand the Learn to Swim programme during this time.
- 6.5 Recognising the role swimming plays in the physical, emotional, and mental health of our communities the price of public swimming has been protected.
 - Limiting the price increase for public swimming to 30p in 24/25.
 - GoCard holders, the council's concessionary membership scheme, continue to receive free swimming, in all public swimming sessions.
 - GoCard membership is free to join, with no other fees attached to card holders who do not wish to access the Health and Fitness gyms.
 - The criteria for GoCard membership are aligned with the Council's Charges and Concessions policy.
- 6.6 In addition to potential income generation there are a number of actions that have been identified that would make savings:
 - Reinforce the need to consistently use pool covers daily, which will help reduce ongoing energy costs, including during school holiday use.
 - Careful management of pool temperatures to reduce the associated utility costs.
 - Reviewing lifeguarding provision to ensure all sessions run as efficiently as possible.

It is difficult to quantify the contribution of these changes until officers have had the opportunity to monitor it over an extended period of time. This information can be reported back to Members at a future point.

- 6.7 In reviewing this proposal the following information has been considered:
 - the public and stakeholder consultation responses.
 - collated results benchmarking exercises.
 - the financial challenges the Council faces.
 - the potential to generate additional income and additional savings.
 - the estimate of potential additional energy costs the Council faces over the next few years.
 - the Council's target to reduce carbon emissions to meet the 2030 Net Zero target.
 - Along with the significant range of Financial, Operational and Education data points highlighted earlier in section 5.1. An overview of this can be found in Appendix 2.
- 6.8 Considering the above, it is proposed Council takes the following actions:
 - Adopts a new pricing policy for all school pool users. This will cover, public swimming, Learn to Swim and club and commercial lets.

 Review the current relationship with Falkirk Council and The Tryst Community Sports Hub. Taking steps to ensure the continuing success of this organisation and allowing the Council to benefit from its use of Larbert HS facility.

7. Implications

Financial

- 7.1 If the above proposals are agreed then the planned £400k budget saving is estimated to be achieved by 2025/26. This will require ongoing review and potentially further changes to the current proposals.
- 7.2 To help mitigate the financial position officers will consider what additional steps can be taken to generate additional income and reduce operational costs based on the suggestions that were reported from the consultation exercises and progress these as required.
- 7.3 Officers have identified the areas of income generation across the programme set out in the table below. Members should note the significant increases in revenue that will be delivered from 25/26 onwards following the return of Graeme HS and Bo'ness Academy to the Council. Following this they will be managed as part of the community access to schools' programme.

	22/23	23/2	4	24/	25	25/2	26	TOTAL
	Actual	Additional	Forecast	Additional	Forecast	Additional	Forecast	INCREASE
LTS	£234,896	£44,289	£279,185	£25,711	£304,896	£112,810	£417,706	£182,810
Private Lessons	£21,700		£21,700	£16,700	£38,400	£1,800	£40,200	£18,500
Public Swimming	£7,904		£7,904	£1,000	£8,904	£500	£9,404	£1,500
Amateur Aquatics Clubs	£16,667		£16,667	£31,843	£48,510	£3,465	£51,975	£35,308
Lets in Graeme HS						£125,000	£125,000	£125,000
Lets in Bo'ness Academy						£48,600	£48,600	£48,600
TOTAL	£281,167	£44,289	£324,456	£75,254	£400,710	£247,886	£692,885	£411,718

ADDITIONAL Income is generated as follows:

- LTS Expansion of programme once more availability opens up with school lets earlier access to schools.
- Private Lessons charges increasing to £160 in 24/25 and to £167 in 25/26
- 7.5% price increase in Public Swimming charges and additional access.
- Aquatics club biggest increase in 24/25 to take it to Scottish Average and thereafter reverting to increases broadly in line with other services – approx.
 7% - going from £63 to £67.
- Following PFI hand back, in August 2025, new income from the commercial lets at the Class 98 schools, which currently goes to the school management operators.

Consultation

- 7.4 To assist in the preparation of this report the undernoted engagements and consultations have taken place:
 - Local Swimming Organisations January, September & November 2023.
 - National Governing Body for Sport (sportscotland) January, August & November 2023.
 - National Governing Body for Swimming (Scottish Swimming) January & November 2023.
 - Secondary Head teachers between September and November 2023.
 Via the Secondary Head Group, with all schools providing feedback.
 - Tryst Community Sports Club October 2023
- 7.5 A series of meetings were undertaken with the local Aquatics Forum with representatives from all local clubs, Scottish Swimming, and sportscotland from January 2023 onwards. Officers provided context around the challenges faced currently by the council. Both in the relation to the wider SPR, and specifically around the need to reduce the operating deficit within the pools.
- 7.6 Culminating in a meeting on 8th November 2023, with representatives from the Amateur Aquatics clubs, and Scottish Swimming. During which officers briefed those present on the recommendations contained within this report. A copy of the recommendations was shared electronically to the wider aquatics' forum afterwards for their consideration.
- 7.7 The consultation and engagement sessions highlighted the following concerns:

Key Themes

- Swimming is a life skill: all pupils should have equal access to swimming lessons.
- Schools place great value on their swimming pool: which play an important role in their ability to deliver PE, and contribute positively to the health and wellbeing of school pupils.
- Concerns that price increases may result in increased financial pressure on clubs. Potentially resulting in fewer sessions per week, and increased charges for club members.

Resources

7.8 There will be no compulsory redundancies linked to this proposal and the existing workforce will be able to deliver on the recommendations of this report.

Legal

7.9 There are no legal considerations or implications in agreeing this proposal.

Risks

- 7.10 The risks highlighted and associated with this proposal are:
 - The Council may not realise the targeted savings. This is mitigated by a significant focus on income maximisation across the pool estate.
 Primarily by investing additional officer time and resources in expanding the current Learn to Swim programme;
 - The amateur aquatics community have expressed significant concerns in their ability to absorb the proposed price increases. This may result in a reduction of lets, and ultimately result in fewer opportunities for club swimmers. This will be mitigated by officers committing to provide support to the local amateur aquatics' community, to review their current scheduling, investigating opportunities for clubs to combine sessions where practicable, to reduce the financial pressures they face; and
 - There is a risk that residents of Falkirk Council will be surprised by the significant percentage increase in fees for use. This will be mitigated through a communications campaign that outlines the exceptionally low starting base.

Equalities

7.11 A full Equality and Poverty Impact Assessment (EPIA) has been completed in relation to this proposal. A copy of the EPIA is available at Appendix 3.

Officers have determined this proposal as being low impact overall. The increases proposed will have a low impact on those accessing Learn to Swim programmes and public swimming. These groups represent the significant majority of overall service users. The prices with the largest proposed increases will only impact commercial operators and aquatics club organisations. The Council's concession scheme remains in place and has been expanded to offer further support to those eligible. Ensuring swimming remains accessible to those in lower income households.

8. Conclusions

- 8.1 Following a comprehensive review of the full pool portfolio across Falkirk Council, further engagement and assessment work with stakeholders it is recommended that Council:
 - (i) agree that a new, standardised pricing structure is adopted for the use of all school pools under Falkirk Council control; and
 - (ii) agree that an update report on the success of this new income plan comes to the December 2024 Council.

Director of Place Services

Author: Cameron Reid, Team Leader Sports Development

Date: 22 January 2024

Appendices:

Appendix 1 – Briefing note pool provision nationally.

Appendix 2 - Financial Analysis & School Demographic Information

Appendix 3 – Equality and Poverty Impact Analysis

List of Background Papers:

None

1. Pool Provision Comparison

A review of swimming pool provision was undertaken examining the level of provision across two sample groups of Scottish Local Authorities. Group 1 (Appendix 1a - Data Table 1) reflects a small sample group of different authorities as a static point of reference used in earlier reviews of pool provision, whilst Group 2 (Appendix 1b - Data Table 2) reflects all 32 Scottish Local Authorities, not including 6 local authorities who did provide details.

Both comparisons show that Falkirk currently retains a high level of pool provision relative to population size and is currently positioned within the top-third nationally.

Appendix 1a

Data Table 1 – Pool Provision Comparison Table (Sample Group 1)

Local Authority	Total number of pools	Population (MYE 2021)	Number of persons per pool	Ratio	Ranking from most swimming pools per head of population	Ratio Rank
West Lothian	19	183,820	10,212	9,675	1	1
Stirling	7	93,470	13,353	13,353	3	2
Falkirk	11	160,700	14,609	14,609	2	3
Fife	14	374,730	26,766	26,766	4	4
Glasgow	20	635,130	31,757	31,757	5	5
North Ayrshire	4	134,220	33,555	33,555	6	6
Renfrewshire	5	179,940	35,988	35,988	7	7
Perth	4	153,810	38,453	38,453	8	8
East Ayrshire	3	122,020	40,673	40,673	9	9
North Lanarkshire	7	341,400	48,771	48,771	10	10
Clackmannanshire	0	51,540	-	-	11	11

Data Table 2 – Pool Provision Comparison Table (Sample Group 2)

Council	No. of Pools	Population	Ratio	Rank
10%				
Orkney Islands	6	22540.0	3756.7	1
Na h-Eileanan Siar	6	26640.0	4440.0	2
West Lothian	16	185580.0	11598.8	3
20%				
Stirling		93470.0	13352.9	4
Dundee City	11	147720.0	13429.1	5
Scottish Borders	8	116020.0	14502.5	6
30%				
Aberdeenshire	18	262690.0	14593.9	7
Falkirk (current)	11	160700.0	14609.1	8
East Lothian	6	109580.0	18263.3	9
40%				
Moray	5	96410.0	19282.0	10
City of Edinburgh	26	526470.0	20248.8	11
Argyll and Bute	4	86220.0	21555.0	12
50%				
South Ayrshire	5	112450.0	22490.0	13
Midlothian	4	94680.0	23670.0	14
Dumfries and Galloway	6	148790.0	24798.3	15
60%				
Inverclyde	3	76700.0	25566.7	16
Fife	14	374730.0	26766.4	17

Council	No. of	-	Ratio	Rank
Classes City	Pools	Population	24750 5	40
Glasgow City	20	635130.0	31756.5	18
70%				
East Renfrewshire	3	96580.0	32193.3	19
North Ayrshire	4	134220.0	33555.0	20
South Lanarkshire	9	322630.0	35847.8	21
80%				
Renfrewshire	5	179940.0	35988.0	22
Perth and Kinross	4	153810.0	38452.5	23
East Ayrshire	3	122020.0	40673.3	24
90%				
North Lanarkshire	7	341400.0	48771.4	25
Clackmannanshire	0	51540.0	-	26
Unknown				
Aberdeen City	-	227430.0	-	
Angus	-	116120.0	-	
East Dunbartonshire	-	108900.0	-	
Highland	-	238060.0	-	
Shetland Islands	-	22940.0	-	
West Dunbartonshire	-	87790.0	-	

Appendix 2 – Financial Analysis & School Demographic Information

			School pools indicative costs				
School pools	Energy costs (electricity and gas)	Staffing	Chemicals	Maintenance	Total	5 year costs	
Bo'ness Acadamy	£75,341.37	£27,910.00	£5,040.00	£7,800.00	£116,091.37	£662,891.34	
Braes High School	£75,341.37	£69,230.00	£5,040.00	£7,800.00	£157,411.37	£873,626.02	
Carrongrange high school	£75,341.37	£27,910.00	£5,040.00	£7,800.00	£116,091.37	£662,891.34	
Denny High School	£75,341.37	£70,700.00	£5,040.00	£7,800.00	£158,881.37	£886,663.83	
Falkirk (Gateway)	£75,341.37	£27,910.00	£5,040.00	£7,800.00	£116,091.37	£662,891.34	
Graeme (Class 98)	£75,341.37	£27,910.00	£5,040.00	£7,800.00	£116,091.37	£662,891.34	
Grangemouth (Gateway)	£75,341.37	£51,520.00	£5,040.00	£7,800.00	£139,701.37	£786,361.04	
Larbert High	£75,341.37	£36,240.00	£5,040.00	£7,800.00	£124,421.37	£706,453.50	
St Mungo's High School	£75,341.37	£86,700.00	£5,040.00	£7,800.00	£174,881.37	£970,336.64	
Total	£678,072.36	£426,030.00	£45,360.00	£70,200.00	£1,219,662.36	£6,875,006.40	

			Leisure	Centres - indicative costs		
Site	Energy costs	Staffing	Chemicals	Maintenance	Total	5 year
Grangemouth	£86,545.23	£158,200.00	£27,100.00	£7,800.00	£279,645.23	1,157,776.58
Mariner Centre	£86,545.23	£242,990.00	£30,000.00	£7,800.00	£367,335.23	2,715,514.55
Income per school pool						
Bo'ness Academy	£0.00					
Braes High School	£99,400.00					
Carrongrange high school	£0.00					
Denny High School	£77,900.00					
Falkirk (Gateway)	£10,600.00					
Graeme (Class 98)	£0.00					
Grangemouth (Gateway)	£27,000.00					
Larbert High	£28,300.00					
St Mungo's High School	£99,640.00					
Total	£342,840.00					

Secondary School	School Roll	SIMD bottom 20%	Females	ASN	LAAC	FME	Distance from Alt Pool Miles
Falkirk HS	1164	35.14%	48.45%	43.64%	4.64%	23.88%	1.96
Graeme HS	1133	24.45%	48.98%	48.28%	3.88%	20.12%	2.87
Grangemouth HS	816	23.90%	50.12%	33.82%	2.82%	22.79%	1.43
St Mungo's HS	1229	18.39%	53.13%	46.70%	1.63%	15.22%	1.96
Denny HS	1390	10.79%	47.63%	31.80%	4.96%	21.01%	7.84
Bo'ness Academy	836	7.78%	50.36%	36.60%	2.63%	17.22%	8.71
Braes	1051	6.66%	48.14%	29.97%	2.28%	11.42%	3.49
Larbert HS	2048	6.15%	50.83%	35.25%	2.39%	12.99%	3.64

User Group	Hours		Income 22/23		Income per hour
Learn to Swim					
Lessons					
(Falkirk Council only)	1410	£	234,896.00	£	166.59
Private Lessons	240	£	21,700.00	£	90.42
Public Swimming					
(Falkirk Council)	430	£	7,904.00	£	18.38
Aquatics Clubs	1540	£	16,667.00	£	10.82

Equality & Poverty Impact Assessment 00653 (Version 1)

SECTION ONE: ESSE	NTIAL INFORMATION	V				
Service & Division:	Place Services			Lead Officer Name	: Cameron Reid	
	Growth, Planning &	Climate		Team	: Sport and Leisure	
				Te	l: 07577969207	
				Emai	l: cameron.reid@falkirk.gov	.uk
Proposal:	Review of School Sv	vimming Pools		Reference No		
What is the Proposa	ıl?	Budget & Other Financial Decision (New		Policy v or Change)	HR Policy & Practice	Change to Service Delivery / Service Design
		Yes		No	No	No
Who does the Proposal affect?		Service Users	Membe	ers of the Public	Employees	Job Applicants
		Yes		No	No	No
Other, please specif	y:					

Other, please	specity:						
Identify the m	Identify the main aims and projected outcome of this proposal (please add date of each update):						
01/12/2023	To implement a new, stand	dardised pricing structure for the use of all school pools under Falkirk Council control.					

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SECTION TWO: FINANCIAL INFORMATION						
For budget changes ONLY please include infor	Benchmark, e.g. Scottish Average					
Current spend on this service (£'0000s)	Total:					
Reduction to this service budget (£'0000s) Per Annum:						
Increase to this service budget (£'000s)	Per Annum:					
If this is a change to a charge or	Current Annual Income Total:	£342840.00	Combined income across Secondary Estate.			
concession please complete.	Expected Annual Income Total:	£462383.00	Uplifts based on the Average fee for Swimming Pool Hire (Exclusive Use per Session) for Juvenile swimmers in 2022			

01/04/2024

Start Date:

End Date (if any):

If this is a budget decision, when will the

saving be achieved?

was £84.23.

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SECTION THREE: EVIDENCE	Please include any evidence or relevant information that has influenced the decisions contained in this EPIA. (This could include
	demographic profiles; audits; research; health needs assessments; national guidance or legislative requirements and how this relates to the
	protected characteristic groups.)

A - Quantitative Evidence

This is evidence which is numerical and should include the number people who use the service and the number of people from the protected characteristic groups who might be affected by changes to the service.

This change will impact 4 main user groups.

- 1 Participants in Falkirk Councils Learn to Swim Programme there are circe 2500 members of this programme.
 - Approximately 95% of these swimmers are children. As such would be defined under the characteristic of age.
- 2 Members of the Amateur Aquatics Community There are circa 350 members of these organisations.
 - It is anticipated that around 85%, or 297 of the swimmers within these clubs are children. As such would be defined under the characteristic of age.
- 3 Casual Swimmer (Informal/Unaffiliated members of the public)- There were around 3313 individual swims taken by members of the public in the past year.
- This equates to 82 swims per week. We do not hold any information on these users. It is anticipated that some of these users will have some form of protected characteristic, however we do not hold any information which would allow us to ascertain the impact.
- 4 Commercial Swim Providers We do not hold any information on the customers of these organisations.

A general statistic across the UK is that one in five people have a disability - https://www.childline.org.uk/get-involved/articles/hidden-disabilities/ - therefore a negative impact on this characteristic is possible.

B - Qualitative Evidence

This is data which describes the effect or impact of a change on a group of people, e.g. some information provided as part of performance reporting.

Social - case studies; personal / group feedback / other

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Analysis

Pricing proposals utilised the recognised industry standard report on the charges for sport & leisure facilities - https://sportscotland.org.uk/about-us/our-publications/archive/charges-for-sports-facilities/

This contributes to the work undertaken by the prices working group, which contains representatives from Sport and Leisure, Business Development, Marketing and Finance.

Formal engagement

A meeting with officers was undertaken with representatives of the amateur aquatics community to discuss the proposed pricing that clubs would pay.

They have voiced significant concerns around the impact on their organisations. specifically in their ability to sustain their current programme should prices increase to the extent proposed.

They have raised concerns that a price increase may result in less club sessions, potentially fewer members and ultimately less children able to participate in the sport competitively.

Best Judgement:					
Has best judgement been used in place of data/research/evidence?	Yes				
Who provided the best judgement and what was this based on?	Sport and Leisure Officers have had to make determinations on the ability of casual swimmers to absorb the proposed price increases. While we do not hold data on the users of the school pools, we do hold information on users of the leisure pools. This was considered alongside national benchmarking data to determine the proposed prices.				
What gaps in data / information were identified?	The council does not hold user information on casual/pay-to-swim customers. The council does not hold information on the users of the commercial swim providers.				
Is further research necessary?	No				
If NO, please state why.	Pricing proposals utilised the recognised industry standard report on the charges for sport - https://sportscotland.org.uk/about-us/our-publications/archive/charges-for-sports-facilities/ This contributes to the work undertaken by the prices working group, which contains representatives from Sport and Leisure, Business Development, Marketing and Finance.				

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SECTION FOUR: ENGAGEMENT Engagemen	t with individual	ls or organisations affected by the policy or proposal must take place	
Has the proposal / policy / project been subject to engagement or consultation with service users taking into account their protected characteristics and socio-economic status?	Yes		
If YES, please state who was engagement with.	Officers engaged directly with representatives from the Amateur aquatics clubs. Annual Fees and Charges is subject to national benchmarking and considers industry analysis and feedback from expert consultants around the market.		
If NO engagement has been conducted, please state why.			
How was the engagement carried out?		What were the results from the engagement? Please list	
Focus Group	No		
Survey	No		
Display / Exhibitions	No		
User Panels	No		
Public Event	No		
Other: please specify	•	meeting was convened with representatives of the Amateur Aquatics clubs - specifically to discuss ag. With club presidents and treasurers invited to attend. The presentation was shared with those .	
Has the proposal / policy/ project been reviewed / changed as a result of the engagement?		No	
Have the results of the engagement been fed back to the consultees?		Yes	
Is further engagement recommended?		No	

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SECTION FIVE: ASSESSING THE IMPACT

Equality Protected Characteristics:

What will the impact of implementing this proposal be on people who share characteristics protected by the Equality Act 2010 or are likely to be affected by the proposal / policy / project? This section allows you to consider other impacts, e.g. poverty, health inequalities, community justice, carers etc.

Protected Characteristic	Neutral Impact	Positive Impact	Negative Impact	Please provide evidence of the impact on this protected characteristic.
Age			✓	With a significant number of users children, the impact of price changes will ultimately impact on this group more. We have no evidence, either formal or anecdotal, which suggest that older users represent a large part of the users in school pools. As such it is not anticipated that this group will be significantly impacted.
Disability			✓	Whilst there are no specialist disability groups who use the school pools, there is a probability that users of mainstream clubs may have hidden disabilities, and therefore these changes may impact them.
Sex	✓			This group will not be specifically impacted by this change.
Ethnicity	✓			This group will not be specifically impacted by this change.
Religion / Belief / non-Belief	✓			This group will not be specifically impacted by this change.
Sexual Orientation	✓			This group will not be specifically impacted by this change.
Transgender	✓			This group will not be specifically impacted by this change.
Pregnancy / Maternity	✓			This group will not be specifically impacted by this change.
Marriage / Civil Partnership	✓			This group will not be specifically impacted by this change.
Poverty			✓	Cost is a barrier to participation in sport and physical activity. As such any increase in price is likely to have a greater impact on those living in poverty.
Care Experienced	✓			This group will not be specifically impacted by this change.
Other, health, community justice, carers etc.	✓			This group will not be specifically impacted by this change.
Risk (Identify other risks associated with this change)				

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Public Sector Equality Duty: Scottish Public Authorities must have 'due regard' to the need to eliminate unlawful discrimination, advance quality of opportunity and foster good relations. Scottish specific duties include:

	Evidence of Due Regard
Eliminate Unlawful Discrimination (harassment, victimisation and other prohibited conduct):	All services will continue to be accessible to everyone regardless of individual characteristics or circumstances.
Advance Equality of Opportunity:	Recognising the role swimming plays in the physical, emotional, and mental health of our communities, the concession scheme has been expanded and will continue to support residents to access services.
Foster Good Relations (promoting understanding and reducing prejudice):	The service remains universal and available to all. The proposals recommended this report do not offer any further opportunity to foster good relations between different protected characteristic groups.

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SECTION SIX: PARTNERS / OTHER STAKEHOLDERS					
Which sectors are likely to have an interest in or be affected by the proposal / policy / project?		Describe the interest / affect.			
		There are a number of commercial swim providers/swim teachers that operate from Falkirk Council swimming pools. As ongoing users they will be interested in the annual price review.			
Councils	No				
Education Sector	No				
Fire	No				
NHS	No				
Integration Joint Board	No				
Police	No				
Third Sector	Yes	There are a number of Amateur Aquatics clubs that operate from Falkirk Council swimming pools. As ongoing users they will be interested in the annual price review.			
Other(s): please list and describe the nature of the relationship / impact.					

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SECTION SEVEN: ACTION PLANNING

Mitigating Actions:

If you have identified impacts on protected characteristic groups in Section 5 please summarise these in the table below detailing the actions you are taking to mitigate or support this impact. If you are not taking any action to support or mitigate the impact you should complete the No Mitigating Actions section below instead.

Identified Impact	To Who	Action(s)	Lead Officer	Evaluation and Review Date	Strategic Reference to Corporate Plan / Service Plan / Quality Outcomes
Low income households will be negatively impacted by an increase in prices.	Low income households	Recognising the role swimming plays in the physical, emotional, and mental health of our communities the price of public swimming has been protected. • Limiting the price increase for public swimming to 30p in 24/25. • GoCard holders, the council's concessionary membership scheme, continue to receive free swimming, in all public swimming sessions	Cameron Reid	31/03/2025	The Falkirk Plan - Poverty - Mental Health and Wellbeing.
Youth aquatics clubs may be impacted by an increase in the cost of lets.	Club members (younger people)	Officers will provide support to clubs to ensure clubs can work together to share lets where possible. Minimising the cost impact to those clubs. It is anticipated that there will be a degree of rationalisation across the lets currently being used by the aquatics clubs as they adapt to the proposed pricing model.	Cameron Reid	31/03/2024	The Falkirk Plan - Working in Partnership with Communities Poverty - Mental Health and Wellbeing.

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No Mitigating Actions						
Please explain why you do not need to take any action to mitigate or support the impact of your proposals.						
Are actions being reported to Members? Yes						
If yes when and how ?	Executive January 2024. A follow up report is to be provided to members on the impact of the recommendations					
	in the pools report. To be presented by Director of Place after 1 year.					

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SECTION EIGHT: ASSESSMENT OUTCOME						
Only one of following statements best matches your assessment of this proposal / policy / project. Please select one and provide your reasons.						
No major change required	No					
The proposal has to be adjusted to reduce impact on protected characteristic groups	No					
Continue with the proposal but it is not possible to remove all the risk to protected characteristic groups	Yes	Officers note the financial pressure on the Council to make significant savings over the next few years. In keeping with the decision of Council in May 2023, officers have looked to develop a strategy that seeks to generate additional income from the swimming pools to mitigate their costs and reflect the fact that Falkirk is well served in terms of swimming pool provision.				
Stop the proposal as it is potentially in breach of equality legislation	No					
SECTION NINE: LEAD OFFICER SIGN OFF						
Lead Officer:						

Signature:

Date:

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VERALL ASSESSMENT OF EPIA: Has the EPIA demonstrated the use of data, appropriate engagement, identified mitigating actions as well as ownership and appropriate review of actions to confidently demonstrate compliance with the general and public sector equality duties?						
ASSESSMENT FINDINGS If YES, use this box to highlight evidence in support of the assessment of the EPIA			The assessment has been informed by user data on the Councils Learn to Swim Programme and members of the Amateur Aquatics Community. Pricing structures have been informed by recognised industry standard research. Engagement has also been undertaken with the representatives from the Amateur Aquatics clubs.			
is box to nign	light actions needed to improve					
Where adverse impact on diverse communities has been identified and it is intended to continue with the proposal / policy / project, has justification for continuing without making changes been made?			If YES, please describe: In keeping with the decision of Council in May 2023, officers have looked to develop a strategy that seeks to generate additional income from the swimming pools to mitigate their costs and reflect the fact that Falkirk is well served in terms of swimming pool provision.			
PACT: The EF	PIA Task Group has agreed the follow	ing level of im	pact on the protected	l characteristic groups highlighted within th	e EPIA	
	COMMENTS					
Yes / No						
Yes / No						
and these user groups represent the significant majority of c				e users. The vast majority of the proposed in	ncreases to pricing	
SECTION ELEVEN: CHIEF OFFICER SIGN OFF						
Director / Head of Service:						
nature: 09/01/2024						
	is box to high of the EPIA is box to high is box to high is box to high ree impact on dit is intendent, has justifiges been made PACT: The EFI Yes / No Yes / No Yes / No Yes / No Yes	well as ownership and ap general and public sector FINDINGS is box to highlight evidence in support of the of the EPIA is box to highlight actions needed to improve rse impact on diverse communities has been dit is intended to continue with the proposal / ect, has justification for continuing without ges been made? PACT: The EPIA Task Group has agreed the follow COMMENTS Yes / No Yes / No Yes / No Yes / No Yes / Low impact identified. The increase and these user groups represent the will only impact commercial operate been expanded to offer further sup VEN: CHIEF OFFICER SIGN OFF	well as ownership and appropriate reviegeneral and public sector equality duties. TFINDINGS The assessment members of the possible of the EPIA The support of the presentative representative represen	well as ownership and appropriate review of actions to confidence and public sector equality duties? TFINDINGS The assessment has been informed members of the Amateur Aquatics of recognised industry standard resear representatives from the Amateur Aguatics of the EPIA is box to highlight actions needed to improve TYES If YES, please describe in keeping with the conference of swimming pool proposes to mitigate the of swimming pool proposes to mitigate the of swimming pool proposes to mitigate the of swimming pool proposes. Yes / No Yes / No Yes Low impact identified. The increases that will affect those accessing Lear and these user groups represent the significant majority of overall servic will only impact commercial operators and aquatics club organisations. been expanded to offer further support to those eligible. VEN: CHIEF OFFICER SIGN OFF Pact SIGN OFF	well as ownership and appropriate review of actions to confidently demonstrate compliance with the general and public sector equality duties? I FINDINGS The assessment has been informed by user data on the Councils Learn to Swim members of the Amateur Aquatics Community. Pricing structures have been informed by the community of the proposed industry standard research. Engagement has also been undertaken to recognised industry standard research. Engagement has also been undertaken to recognise industry standard research. Engagement has also been undertaken to recognise industry standard research. Engagement has also been undertaken to recognise industry standard research. Engagement has also been undertaken to recognise industry standard research. Engagement has also been undertaken to recognise industry standard research. Engagement has also been undertaken to recognise industry standard research. Engagement has also been undertaken to recognise industry standard research. Engagement has also been undertaken to recognise industry standard research. Engagement has also been undertaken to recognise industry standard research. Engagement has also been undertaken to recognise industry standard research. Engagement has also been undertaken to recognise industry standard research. Engagement has also been undertaken to recognise industry standard research. Engagement has also been undertaken to recognise industry standard research. Engagement has also been undertaken to recognise industry endertates in the experience in the sall structures have been informed by user data on the Councils Learn to Swim programmes and general public so symming pool provision. Yes / No Yes	

SECTION TEN: EPIA TASK GROUP ONLY

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