

Equality Impact Assessment: Conversation Screening Tool

[Use this form to prompt an EIA conversation and capture the discussion. This completed form or if needed, a full EIA report (form 3) will be published as part of the decision-making process **Please delete prompts before publishing**

What is being reviewed?	BCP Greenspace Play and Wheeled Activity Strategy
What changes are being made?	In May 2022 Martin Whitchurch presented a "Play Overview and Next Steps" document to overview and scrutiny. It was agreed that a ten-year Play and Wheel strategy would be developed for the future of the play areas and wheeled sports provision in BCP Council A Key Strategy to support positive health & wellbeing outcomes.
Service Unit:	Environment
Participants in the conversation:	Martin Whitchurch Rebecca Whelan-Edmonds Barbara Uphoff Steve Butcher
Conversation date/s:	21.11.23
Do you know your current or potential client base? Who are the key stakeholders?	Public users of play areas and Greenspaces, includes a range of groups and stakeholders eg schools, youth groups, special needs providers, carers
Do different groups have different needs or experiences?	<p>All demographics should feel able to use play areas. We design play areas and wheeled activity provision's, these sites need to be as inclusive as possible and encourage use by all ages and abilities.</p> <ul style="list-style-type: none"> • age (young/old) – play spaces are designed for a range of ages to use the equipment, there should be no limitation or signage that stipulates who the equipment is for. The police often request 'under 12s play area' to assist with enforcing, but individual needs are not age dependant. An 8 year old may be highly proficient in climbing and be adventurous; a 16 year old may have additional needs and not be able to use challenging equipment. • Disability – designing play areas to be inclusive is important but not all 'disabled equipment' is appropriate, For example, some wheelchair accessible swings take up a lot of space and can be seen as so stigmatised that they are not used. Ground level trampolines and roundabouts, basket swings and platform-accessible multi-play units are the best way to • gender reassignment – no specific comments related to play

	<ul style="list-style-type: none"> • pregnancy and maternity – provision of play areas is important to where people live when they are planning a family, but no specific comments. • race, religion or belief – should not affect use of a play area. Work to encourage people of different races is important in our branding and communication to reflect our inclusivity and accessibility of spaces. • Gender – making space for girls is important in Greenspaces and is a growing area of research and innovation. Girls prefer hang out and performance spaces, as well as traditional equipment. Play spaces can be male-dominated in terms of physical challenge. Addressing this through high-quality design is important • any other factors/groups e.g. socioeconomic status, carers, human rights. – Play areas should be available to all, free of charge and regardless of user.
Will this change affect any service users?	The development of a design guide and strategy will help shape the provision of play and wheeled activity for the next 10yrs across BCP. This will help us to understand our current offer and provide better provision in the future if there is the available funding to do so. This change should be positive to attract more users to play spaces, increase health and well-being and activity levels across all ages.
<p>[If the answer to any of the questions above is 'don't know' then you need to gather more evidence. The best way to do this is to use forms 2 and 3. <i>*Please delete prompts before publishing*</i></p>	
What are the benefits or positive impacts of the change on current or potential users?	<ul style="list-style-type: none"> • Review of our current provision • Better quality play spaces • Better quality equipment, design and function • More accessible to a wider group of users • Aids social cohesion and use of greenspaces • Increase health and well-being and activity levels across all ages.
What are the negative impacts of the change on current or potential users?	Rationalisation of some provision that is in poor repair or failing equipment that is no longer meeting British Standards.
Will the change affect employees?	No
Will the change affect the wider community?	Yes, as above
What mitigating actions are planned or already in place for those negatively affected by this change?	Phase 1 Community Engagement happened in 2022 and findings are being incorporated into the development of the strategy. Phase 2 Community Engagement is planned for March 2024 sharing the vision, strategy and development guide. Strategy being reviewed at Place Overview and Scrutiny committee

Summary of Equality Implications:

Providing play areas is seen as a fundamental requirement of a quality public greenspace. We hope that the provision of a new strategy for Play & Wheeled activity will improve the user experience, increase accessibility, increase usability and ensure the experience is a positive one for all users of the site.

The Design guide will ensure all future developments across the conurbation will meet with our design expectations including accessibility for all users.

High quality design and inclusivity will also elevate this work to ensure positive public reaction and uptake.

Work following the EIA

Following the writing of the EIA and as the strategic work developed, it was felt useful to seek independent advice and support for this work.

DOTs Disability is an organisation run by and for disabled people, older people and carers. DOTs support BCP consultations and other strategic work and were asked to review drafts of the Plan for Play and design Guide.

A summary of their recommendations is detailed below, and these will be taken forward should the recommendations at BCP Cabinet on 10 December 2024 be approved.

Those comments or recommendations already incorporated or addressed are marked with a tick ☒



1. Accessibility and Readability of The Guide

- Review the document against the RNIB guidance and incorporate ☒
- Develop text only version ☒
- Include ALT tags for images ☒
- This document needs to be accessible to a wide audience therefore it should reflect the Plain English standards <https://www.plainenglish.co.uk/free-guides.html>
- Consider a consistent use of accessible font across departmental documents

2. Equality Requirements and Creating Equitable Spaces

To achieve accessible and inclusive play for disabled children and others who face barriers to play; the concepts of a Social Model of Disability, access and inclusion will need to be sufficiently embedded across all the internal and external documentation and understood. All stakeholders who will be involved in this area of work will need to develop, deliver and monitor within these principles and resource appropriately

The Social Model frames disability as something that is socially constructed. Disability is created by physical, organisational and attitudinal barriers and these can be changed and eliminated. This gives us a dynamic and positive model that tells us what the problem is and how to fix it. It takes us away from the position of "blaming" the individual for their shortcoming. It states that impairment is, and always will be, present in every known society, and therefore the only logical position to take, is to plan and organise society in a way that includes, rather than excludes, Disabled people."

Barbara Lisicki, 2013

Recommendations

The Strategy should:

- Make an explicit commitment to the use of the Social Model of Disability as a framework for understanding and responding to disability to achieve access and inclusion ☒
- Make a resourced commitment to delivering on the definitions of Accessibility and Inclusivity used by PiPA Play ☒
- Make a commitment to ensuring that all associated Equality Impact Assessments (EIAs) are written from a Social Model perspective ☒
- Make an explicit commitment and resource to ongoing, accessible, appropriate and sustainable 'working with' activities local community stakeholders to make joint and informed decisions ☒
- Make clear the parameters of all "working with" activities with community stakeholders. So that people are clear about the extent to which they have opportunity to affect or influence decisions and where they have not
- Make an explicit commitment to a monitored requirement for internal/external statutory, voluntary sector and private partners to develop and deliver goods and services which reflect good EDI practice, reflect Social Model of Disability and the PiPA definitions of access and inclusion
- Language which reflects a Social Model of Disability should be employed consistently across all documentation and communication. Include the wording "Disabled People across the impairment groups and list the following impairment groups: ☒
 - Visual Impairment
 - Hearing Impairment
 - D/deaf people
 - Learning Difficulties
 - Neurodivergence
 - Mental Wellbeing
 - Long term Health Condition
 - Physical Impairment
- The term "people with disabilities" should not be used ☒

3. How will work with Community Stakeholders?

Recommendations

- Decide internally where your department sits on the ladder in terms of this strategy. Clearly, the closer to meaningful and funded co-production the better. Research indicates longer term savings and better social outcomes with this approach ☒
- State this position in the strategy and ensure that all stakeholders understand the parameters and implications of the position ☒
- Acknowledge and commit resources to planning for the work needed to reach those furthest from play

4. Access and the Wider Context

Recommendations

The strategy should state that:

- The presence of access features already in situ should inform prioritisation and decision-making process for both improvement and decommission ☒
- That BCP officers undertaking self-assessment processes have the skills, knowledge and competence to assess key features against the Part M building standards ☒
- Interdepartmental working is central to the achievement of accessible and inclusive play space and commit to developing working practices that exploit the opportunities to increase access
- Due consideration, from a Social Model perspective, is given to actions which prevent the reduction in the accessibility of provision for disabled children and therefore a disproportionate negative impact of this strategy on disabled children and adults

5. Specific Feedback - Foreword

Recommendations

- Amend the wording to state: "Inclusive Play and access to play is important for children and families/carers from across all the protected characteristic groups, including disabled people from across all of the impairment groups" ☒
- Wording should reference to the Centre for Inclusive Design and the British Standards Institute, standards for an inclusive public realm. ☒
- It could also reference that working across Parks, Transport, Tourism and other departments is central to an 'Accessible and Inclusive Bournemouth' ☒
- The strategy could reiterate the resource implication at this point. It could also reference the positive long-term community and financial outcomes of a co-production approach
- Consider the following wording: "will identify the physical, information / communication / systemic and attitudinal barriers to play and develop solutions to remove or mitigate these"
- Give a high level of consideration to a review of the facilities mapping exercise report to ensure that access features (present or not) have been fully addressed and where appropriate against the Part M Building Regulations
- Remove move the Chief Medical Officer Quote ☒

- Reference the duty to meet the Single Equality Act, General and Specific Duties and make an overt commitment to delivering on these internally and externally through service standards, contract management and key performance indicators ✓
- Reference Anticipatory Duty and link this to how BCP will work with community stakeholders to undertake EIAs to identify barriers and solutions
- Use the term Inclusive Design and not make statements about meeting 'all need' ✓
- State specifically that DOTS undertook an independent review of the strategy document and made recommendations to mitigate against the risk of discriminatory practice. It is important to demonstrate the independent nature of the commentary but alongside that our commitment to provide a supportive and objectively critical commentary and advice throughout this process ✓
- State that initial conversations with community partners and representatives will inform the development of a range of accessible and inclusive 'working together' approaches. ✓
- State that these approaches will reflect BCPs position on the Coproduction ladder and will be appropriately resourced. To achieve a representative cross section of view, these could include but not be limited to: ✓
 - Ad hoc discussions in parks
 - Organised events in parks or family/community centres
 - Protected Characteristic specific settings
 - Overarching representative advisory group
- Contain a commitment to developing an appropriate Terms of Reference for any Reference Group and explicitly state the extent to when, where and how members can influence decisions
- Commit resources to backfill or recognise/reward unfunded commitment, resources and time to any Reference Group or Advisory Group by the voluntary sector or independent community representatives
- That a rapid review of how disability access was addressed with in the data collection and analysis and its impact on ranking is undertaken
- State of BCP Play section does not address the current locations or condition of 'accessible' play spaces or play spaces which have specific equipment to meet the needs of children with complex needs who cannot transfer out of wheelchairs.
Recommendation: This section should reference the condition and location of play spaces with access features and adapted equipment
- The EIA should comprehensively address the significant potential for disproportionate negative impact of closure of accessible play spaces for families with disabled children
- We welcome the commitment to more accessible spaces and "modern inclusive standards".
Recommendation Rather than use the word "modern" the document should refer to the relevant standards and guidance ✓
- Inclusivity and Disabilities - we noted in the previous report that this language reflects the medical/individual model of disability and does not aid the designers and developers in their thinking.

Recommendation: The section “Inclusivity and Disabilities” must be changed to “Creating spaces inclusive of Disabled People” ☒

- Disability Access and Inclusion should be listed as a theme addressed in “working with” activities with communities ☒
- It is important that full and robust EIA is undertaken to make sure that methodologies for working with communities are accessible and inclusive
- The Strategy should explicitly state what its engagement model is and the parameters of this in terms of its “working “activities with communities ☒

The strategy should:

- Only use the term Co-production if that is the approach you are adopting ☒
- In terms of any Reference or Advisory group; the strategy should make a commitment to ☒
 - Providing Terms of Reference
 - Clarity of parameters of activity
 - Clarity in terms of what influence and power participants have
 - Equitable and sustainable representation across groups and individuals