



Equality Impact Analysis

Title of policy, function or service	Improvements to Watford's Adventure Playgrounds
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Type of policy, function or service:	New/Proposed X
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1. Background

UPDATE

A proposal has come forward to enhance the play offer for young people in Watford at two adventure playgrounds (APGs), combined with the withdrawal of staff who currently supervise the APGs. This proposal was originally considered by Watford Borough Council's Cabinet on 4 July 2016 and subsequently upheld by the council's Overview and Scrutiny Committee on 21 July 2016.

Since this time, the council has received a letter from solicitors acting on behalf of a user of the current service threatening a legal challenge to the decision taken by Cabinet on 4 July 2016 (and which was subsequently upheld by Call-in on 21 July 2016), in relation to the proposals for investment in its adventure playgrounds at Harebreaks and Harwoods on a number of grounds.

The council has considered the content of the letter carefully and has taken the view that it would be prudent to retake the decision on the future of the Adventure Playgrounds at its Cabinet meeting on 10 October 2016.

Also in response to the legal challenge, the equality impact analysis has been reviewed and updated where appropriate and where additional information has been made available that is relevant to the issues raised.

Overview of improvements to Watford's Adventure Playgrounds

Whilst significant investment has been made in the town's play areas as part of the delivery of the borough's Green Spaces Strategy, these improved facilities meet the needs predominantly of a younger age range (under 12s).

Extension of provision

A gap in provision has been identified for adventurous play for an older age range than is currently catered for within Watford's play areas. This provision needs to have a wide appeal and meet the demands of today's young people for outdoor play facilities

In addition, a review of the council's two Adventure Playgrounds (APGs) at Harebreaks and Harwoods identified that, whilst offering a good service for those young people who did attend, take up was limited in comparison to the number of young people within the age range of 5-15 years across the borough, with a significant correlation between users and their proximity to the site.

Furthermore, the facilities themselves are outdated, with substantial investment required to bring them up to an acceptable and, in the long term, safe standard. The buildings had a limited life span when erected, which they have now far exceeded.

Financial pressures

The reduction and then removal of the Revenue Support Grant by Central Government means that the council has to make savings of approximately £3m by April 2019. At the same time the council wishes to create an improved play offer that is high quality, modern, sustainable and more accessible.

The Proposal

A company called Southern Green was commissioned to provide design possibilities for the two APGs, with a brief including:

- making the Adventure Playgrounds accessible at all times, for ages 5 – 15 years
- modern, innovative and challenging play experiences
- designs to take into account health and safety guidance
- play areas to be durable and sustainable and equipment to have a 20 year lifespan
- providing a destination for families from across the borough
- specifically in relation to Harebreaks to work with the existing natural environment

This has given rise to outline designs, which, whilst developing towards a final, agreed design, at this stage, are still outline proposals and could be subject to change.

The design proposals in summary:

The playgrounds at Harwoods will include a number of play zones which encourage different types of adventurous play opportunities in different environments:

- a welcoming space for families gathering together, seating, and play equipment for younger children so that there is a full family offer provided
- a climbing wall
- an iconic tower with aerial tunnel, slides, and bridge
- adventure trail challenges
- double zip wire
- exciting swing area and natural play areas

This will all be integrated and linked to the existing MUGA and other outdoor areas. The whole area will be connected by a landscaping scheme including new planting and walkways. It will be necessary to remove some trees from this site in consultation with the council's Arboricultural Officer.

For Harebreaks playgrounds the same design criteria remain, however the proposals are tailored to the existing habitat. The play zones will include:

- a welcoming space for families gathering together
- woodland transition, to encourage and intrigue visitors to venture within the woodland
- an iconic fixed play structure to excite and challenge young people
- adventure trail challenges
- some of the former play area reverting back to a more natural habitat

Again this will be linked to existing outdoor areas such as the existing playground.

The above proposals will lead to improved facilities at the playground sites that can be enjoyed all year round by children and families. This can be contrasted with the current opening times for the APGs, which are as follows:

April to October (summer opening hours)

Harebreaks Adventure Playground

	MON	WEDS	THURS	FRID	SAT	SUN
Term Time	3.30 to 6pm	3.30 to 6pm	3.30 to 6pm	3.30 to 6pm	11am to 5pm	11am to 5pm
School Holidays	10am to 5pm	10am to 5pm	10am to 5pm	10am to 5pm	11am to 5pm	11am to 5pm

Harwoods Adventure Playground

	MOND	TUES	THURS	FRID	SAT	SUN
Term Time	3.20 to 6pm	3.20 to 6pm	3.20 to 6pm	3.20 to 6pm	11am to 5pm	11am to 5pm
School Holidays	10am to 5pm	10am to 5pm	10am to 5pm	10am to 5pm	11am to 5pm	11am to 5pm

November to March (winter opening hours)

Harebreaks Adventure Playground

	MON	THURSDAY	SAT	SUN
Term time	3.30 to 5.30pm	3.30 to 5.30pm	11.30am to 4pm	11.30am to 4pm
School holidays	12.30 to 3pm	12.30 to 3pm	11.30am to 4pm	11.30am to 4pm

Harwoods Adventure Playground

	TUES	FRID	SAT	SUN
Term time	3.20 to 5.30pm	3.20 to 5.30pm	11.30am to 4pm	11.30am to 4pm
School holidays	12.30 to 3pm	12.30 to 3pm	11.30am to 4pm	11.30am to 4pm

Easter and summer holiday play activities

The upgraded APGs would not be restricted to specific opening hours and would not require staffing. It is proposed that in addition, play activities will be commissioned for the two week Easter break and for six weeks in the summer holiday period. These activities would support use of the two new playgrounds, Watford's parks and open spaces, the Big Events programme and other locations in the borough. Following the decision in July, informal engagement was undertaken at two sessions in August with users of the two playgrounds to seek their feedback on what could be included in the Easter and summer holiday activities programme as well as their views on the playground designs.

Maintenance

Regular inspection and maintenance of the new play grounds will become part of the contract with Veolia. Appropriate signage will be placed at the entrances to the play grounds welcoming visitors and advising on use of the equipment.

Impact on current staffing

The major staffing change delivered by these proposals is that the playgrounds will no longer be supervised, which means the members of staff employed to deliver the current service will be affected. Engagement with the staff was initiated in advance of Cabinet in July. Since the decision in July, statutory consultation has been undertaken with staff and, subsequently, redundancy notices have been issued. The threatened legal action has not affected these notices, although if Cabinet decides not to proceed with the proposals the redundancy notices will be withdrawn.

Drop in sessions: July 2016

The proposals will provide play facilities for older children across the borough. In view of this, it was expected that there would be community interest in what is planned at the two sites and people would want to find out more. Two information events were held in July 2016 These were 'drop in' and gave people an opportunity to view the plans, which were also made available via the council's website and to provide suggestions for the Easter and summer programme of play activities

2. Focus of the Equality Impact Analysis

This EIA, therefore, considers the potential equality related impacts, both positive and negative of the investment in Watford's adventure playgrounds on the people in the groups or with the characteristics protected in the Equalities Act 2010.

These are:

1. Age
2. Disability
3. Gender Reassignment
4. Pregnancy and maternity
5. Race
6. Religion or belief
7. Sex (gender)
8. Sexual Orientation
9. Marriage and Civil Partnership

4. What we know about the Watford population

The proposals for the investment in the APGs focus on providing broader adventurous play opportunities for 5-15 year olds.

Age

In terms of Watford, the most recent population figures (mid 2015 estimate) show there are the following numbers of young people in this age category:

5-9 years	6,740
10-14 years	5,692
TOTAL	12,432

This equates to around 12.9% of the population (96,400 in total). We also know that there are 7,424 0-4 year olds in Watford as of 2014. These children will move into the 5-9 years category over the next 5 years, which shows a rising number of young people in the borough within the target age range for these play facilities (the 0-4 years who will be 5-9 years are greater in number than the 10-14 years who will be leaving the 5-15 year age range)

Ethnicity

In terms of Watford overall, the Census 2011 shows the following breakdown for the top five ethnicity groups: White British (61.9%), White other (7.7%), Pakistani (6.7%), Indian (5.5%) and Other Asian (4.4%).

Religion

In Watford overall, the religious breakdown in the Census 2011 between the main belief groups was: Christian (54.1%), Muslim (9.8%), Hindu (4.8%), with no religion stated at 21.4%.

Health

In terms of health, we know that as of 2014/15, 30% of Watford children were classified as 'overweight'. The link between a healthy weight and physical activity (as well as healthy eating) is well signposted.

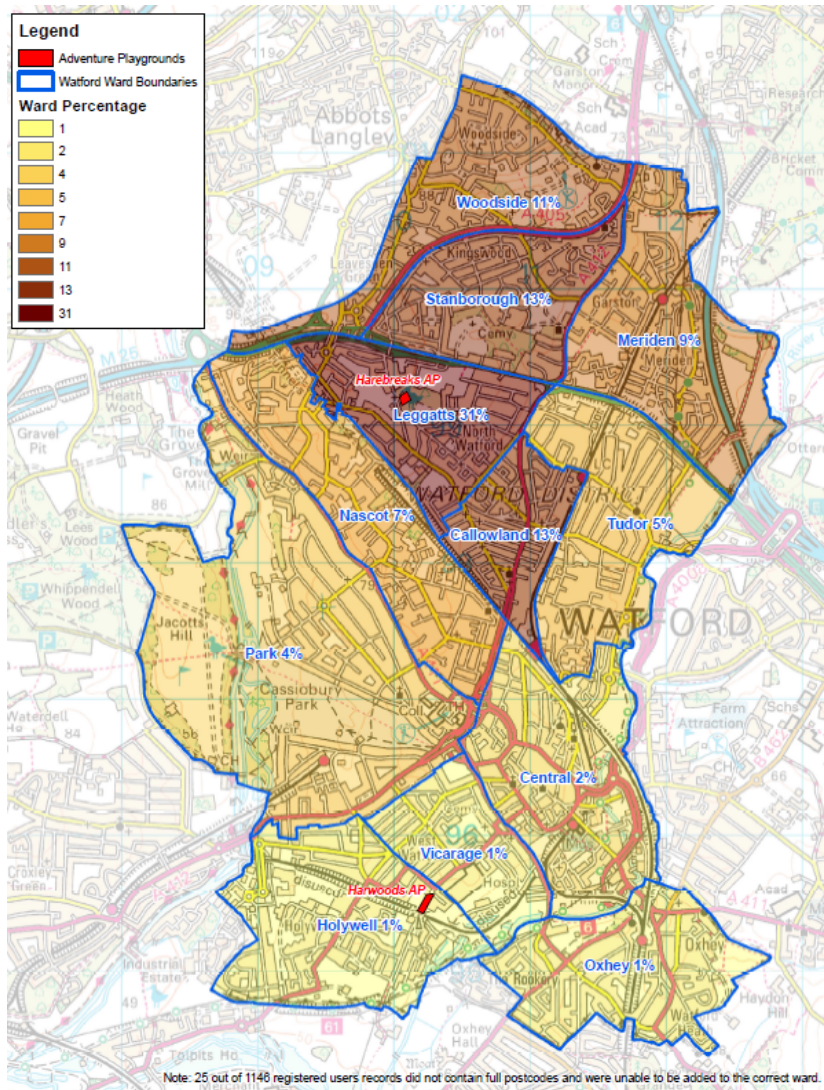
5. What we know about current users

i. Harebreaks

As of end of June 2014 there were 1614 children registered at Harebreaks Adventure Playground. Of these 433 (27%) were not Watford residents.

From the data provided the following is the ward breakdown of registered users who were Watford residents (i.e. the 1171 registered users who stated they were Watford residents 25 did not give details of their ward/postcode):

Callowland	150 (13%)	Oxhey	14 (1%)
Central	28 (2%)	Park	45 (4%)
Holywell	13 (1%)	Stanborough	153 (13%)
Leggatts	361 (31%)	Tudor	57 (5%)
Meriden	105 (9%)	Vicarage	10 (1%)
Nascot	82 (7%)	Woodside	128 (11%)

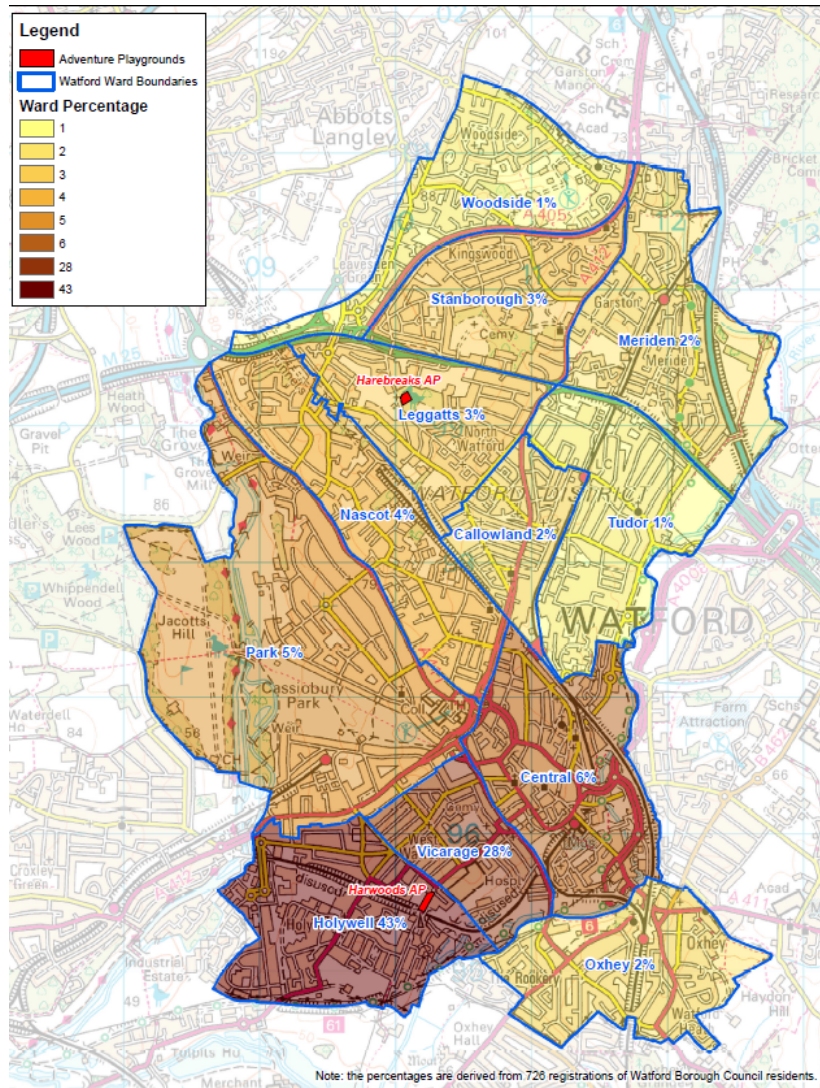


ii. Harwoods

As of end of June 2014 there were 876 children registered at Harwoods Adventure Playground. Of these 133 (15%) were not Watford residents.

From the data provided the following is the ward breakdown of registered users who were Watford residents (i.e. the 726 registered users who stated they were Watford residents). From the data provided (i.e. not all gave postcodes), the following is the ward breakdown of registered users – 71% of registered users are from two wards (Holywell and Vicarage).

Callowland	15 (2%)	Oxhey	18 (2%)
Central	43 (6%)	Park	35 (5%)
Holywell	315 (43%)	Stanborough	22 (3%)
Leggatts	19 (3%)	Tudor	6 (1%)
Meriden	17 (2%)	Vicarage	202 (28%)
Nascot	28 (4%)	Woodside	7 (1%)



iii. Equalities related data available at the time of developing this revised EIA

The following data has been collated from new registrations in 2015/16 at the two adventure playgrounds. It provides the most up to date equalities related information available on users of the centre across: sex, age, disability, ethnicity and religion.

Harebreaks APG

Total registration forms received: 769

a. Sex

	Male	Female	Not reported
Actual	412	353	4
%	54%	45%	1%

There is a slightly higher percentage of males registered than in the population overall.

b. Age

Years	5	6	7	8	9	10	11	12	13	14	15	Not reported
Actual	103	104	100	92	92	76	94	43	39	17	4	5
%	13%	13%	13%	12%	12%	10%	12%	6%	5%	2%	1%	1%

This data shows that the average (mean) age of the children attending is just over 8.5 years – towards the lower end of the age range provided for at the playground. The median age is 8.

c. Ethnicity

Ethnic group	Number	Percentage
White British	444	58%
White Irish	5	1%
White other	49	6%
Indian	26	3%
Pakistani	18	2%
Bangladeshi	0	0%
Chinese	3	0.5%
Other Asian / Asian British	11	1%
African	17	2%
Caribbean	10	1%
Other Black / Black British	0	0%
Mixed	49	6%
Not recorded	137	18%

The level of ‘not recorded’ means that it is difficult to assess the ethnicity data against that for the area and Watford overall.

Harebreaks is within Leggatts ward; from the registration data in 2014 just over 30% of those registered came from this ward. At the time of the Census 2011 Leggatts had the following ethnic make up (largest 3 groups): White British: 61.4%, Pakistani: 11.1% and White Other: 5.9%. The take up shown above for the Pakistani community would be expected to be higher (data shows 2%)

given the population in the immediate area (Leggatts: 11.1% Pakistani residents) from which the highest percentage of registrations is drawn.

d. Disability

	Yes	No	Not reported
Actual	24	703	42
%	3%	91%	6%

There is no breakdown between physical and learning difficulties within the registration information.

e. Religion

Religion	Number	Percentage
Buddhist	0	0%
Christian	256	33%
Hindu	22	3%
Muslim	25	3%
Jewish	8	1%
Sikh	2	1%
Other	45	6%
Not recorded	411	53%

The registration form did not allow for a 'no religion' option, which was an option in the Census 2011 and registered a significant response in both wards.

In terms of the options available, the main religions in the Leggatts ward were Christian (52.6%) and Muslim (13.8%).

Harwoods APG

Total registration forms received: 324

a. Sex

	Male	Female	Not reported
Actual	183	130	11
%	56%	40%	4%

There is a higher percentage of males registered than in the population overall.

b. Age

Years	5	6	7	8	9	10	11	12	13	14	15	Not reported
Actual	48	50	33	45	43	31	34	13	16	7	2	2
%	15%	15%	10%	14%	13%	10%	11%	4%	5%	2%	0.5%	0.5%

This data shows that the average (mean) age of the children attending is just under 8.5 years – towards the lower end of the age range provided for at the playground. The median age is 8.

c. Ethnicity

Ethnic group	Number	Percentage
White British	106	33%
White Irish	3	2%
White other	42	13%
Indian	5	1%
Pakistani	47	14%
Bangladeshi	2	1%
Chinese	0	0%
Other Asian / Asian British	6	2%
African	25	8%
Caribbean	7	2%

Ethnic group	Number	Percentage
Other Black / Black British	0	0%
Mixed	28	9%
Not recorded	53	16%

The level of 'not recorded' means that it is difficult to assess the ethnicity data against that for the area overall.

Harwoods is just within Holywell ward in west Watford, which at the time of the Census 2011 had the following ethnic make up (largest 3 groups): White British: 48.5%, Pakistani: 14.4% and White Other: 9.5%. The neighbouring ward – Vicarage – had the following ethnic make up in 2011 (largest 3 groups): White British: 35.8%, Pakistani: 18.5% and White Other: 12.5%

Registration data from 2014 shows that over 70% were from these two wards so the expectation would be that attendance should reflect the community in which the playground is situated. Overall, this is broadly the case.

In terms of Watford overall, the Census 2011 shows the following breakdown: White British (61.4%), Pakistani (11.1%), White other (5.9%) and other Asian (5%).

d. Disability

	Yes	No	Not reported
Actual	9	277	38
%	3%	85%	12%

There is no breakdown between physical and learning difficulties within the registration information.

e. Religion

Religion	Number	Percentage
Buddhist	0	0%
Christian	110	34%
Hindu	9	3%
Muslim	55	17%
Jewish	4	1%

Religion	Number	Percentage
Sikh	0	0%
Other	137	42%
Not recorded	9	3%

The registration form did not allow for a 'no religion' option, which was an option in the Census 2011 and registered a significant response in both wards.

In terms of the options available, the two main religions in both the Holywell and Vicarage ward were Christian and Muslim with 49.5% Christian and 19.0% Muslim in Holywell and 47.4% Christian and 23.5% Muslim in Vicarage respectively.

Staff

In total, 15 staff would be affected by the change in service provision.

Of these 4 are male and 11 female.

6. Engagement

Engagement and information events were undertaken on 9 July and 11 July to show local people the plans and to take feedback. There was limited attendance at these events and so there is little further information to be added to this analysis.

Overall, feedback received to the council through various routes, such as letters to the Mayor and Mayor's office and in response to the communications sent out on 24 June and 1 July 2016, has been concerned with the loss of the supervised element of the service and the impact this would have on young people. Whilst there will still be opportunities at Easter and summer for young people in the 5-15 years age range to participate in play activities with qualified play workers and without a parent/carer present – thus offering a similar 'discovery' experience, feedback remains concerned with the loss of this service on a daily basis throughout the year.

Easter and summer programme of activities

In August 2016, two sessions were held (one at each APG) to find out young people's views of possible holiday activities. The engagement was informal and the young people were able to choose between a number of activities proposed as well as suggesting any of their own. The engagement highlighted that sports and music related activities were the preferred options for the young people, with sports of particular interest to males.

Also raised were concerns about the age appropriateness of the activities with requests not to mix the younger age group with the older.

Staff

Affected staff were subject to a 30 day consultation period on the proposals from 11 July – 8 August 2016.

7. How will the council ensure equality is promoted through investment in Watford's APGs

Under s 149 of the Equality Act 2010, three areas need to be considered when analysing the equality impact of the investment in Watford's APGs:

The need to:

1. **eliminate** discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
2. **advance** equality of opportunity between people who share a relevant protected characteristic and people who do not share it;
3. **foster** good relations between people who share a relevant protected characteristic and people who do not

Given what we know about the Watford population, the registered users of the APGs and from the feedback that has been received, the following is the assessment of the equality impacts, both positive and negative of the proposed changes to play provision in Watford.

A. Positive impacts

The proposed change to the play provision at Watford's two APGs is likely to have the following positive impacts:

1. **Advance equality of opportunity between people who share a relevant protected characteristic and people who do not share it**

The opportunity provided by the investment means that both playgrounds can be designed to maximise accessibility for children of all ages. This will include not just the equipment installed but also the pathways and access to and around the site.

The play activities commissioned during the Easter and summer holidays will reflect the need to be accessible and to cater for a wide range of young people and abilities. In terms of young people with disability, this will include both physical and learning disabilities. In addition, these activities will be designed to meet the needs and reflect Watford's diverse community. Locations for these activities are yet to be confirmed but they will need to take into account areas which will advance equality of opportunity in terms of diverse neighbourhoods with a high number of young people.

2. **Foster good relations between people who share a relevant protected characteristic and people who do not**

The changes to the playgrounds will broaden the offer available to young people from 5-15 year olds and their families. By providing facilities 24/7 throughout the year there will be more opportunity for young people to use the facilities and to engage with each other through play. As shown in the analysis of registrations there

is a strong correlation between registered users of the facilities and the area in which they are located compared with the overall population of 5-15 year olds in the borough. The aim of the upgraded facilities will be to appeal to a broader range of young people from across the borough thus meeting the duty to foster good relations between people who share a relevant protected characteristic and people who do not.

The quality and range of equipment on offer will also broaden the playgrounds appeal and encourage greater usage from across the borough – ultimately providing a ‘go to’ destination for young people and their families. The proposed designs include integrated picnic areas, a meeting space with seating, which will provide more opportunities for families to gather and be part of the new experience.

3. **Sustainable provision**

As outlined above, the council is facing another period of substantial reductions to its revenue budget. This means that all services are under pressure and long-term sustainability cannot be guaranteed under current financial constraints.

Undertaking this investment will ensure there are good quality facilities available for the 5 – 15 age range for the next 20 years – given the lifespan of the equipment being installed.

B. Negative impacts

The proposed change to the play provision at Watford’s two APGs is likely to have the following negative impacts:

1. **Loss of current amenity**

The APG and Play Ranger service as they are currently delivered will cease from October 2016. This means that current service users will no longer be able to access a supervised play service at the two APG sites. This will have an impact on those young people used to accessing a supervised facility with organised activities. Adventurous play will still be available on both sites along with tailored activities during Easter and summer. However, there will not be a staffed service as at present.

It will also potentially impact the parents and carers of those young people. This is because parents and carers will, if they feel the age and ability of their children requires it, need to supervise their children’s play at the upgraded facilities unlike the present service where they are not required to provide supervision. This would be similar to the situation at the borough’s other outdoor play facilities. This change may have a greater effect on those lower-income households that rely on the APGs to provide a form of supervised childcare.

Where parents/carers require childcare provision, including after school provision, this is available at other facilities in the borough that have been established with the specific remit for childcare. Many are in the locality of the current APGs albeit there is likely to be a charge to parents / carers.

2. **Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act and possible anti-social behaviour/criminal behaviour**

Unsupervised play means there is potential for unacceptable behaviour not to be dealt with directly. This behaviour could take the form of discrimination, harassment or victimisation or other behaviour prohibited under the Equality Act 2010 and related to protected characteristics. All the borough's outdoor play areas are monitored by the Park Ranger service and the rangers can deal with issues as they arise and as notified. Where incidents are of a more serious nature, the borough has a very effective, multi-agency approach to tackling anti-social behaviour, which has a positive impact when incidents are reported. Any issues that would be deemed anti-social behaviour would be reported through the council's Community Safety Co-ordinator. A contact number for the Park Ranger service could be included on the information boards on both sites.

The play activities that will be commissioned by the council will be designed to address issues around accessibility and inclusion and should also clearly set out to those attending what is expected in terms of behaviours and actions. The council should expect any commissioned/organisation to explain their approach to equalities within any submissions and the council should assure itself that the duties under the Equality Act 2010 are understood and actioned by any commissioned organisations.

3. **Disabilities**

The equalities data has identified that there are some young people with disabilities attending the current service. It is not clear from the data as to the exact nature of their disabilities. There is a potential negative impact on these young people from the loss of the current service provision, although the extent of that impact is difficult to gauge without knowing how many children with disabilities were left at the APGs under the supervision of staff.

For those with physical disabilities, it is recommended that the design and equipment within the new provision takes into account issues of accessibility and suitability of use by young people across the spectrum of physical abilities.

For those with physical and learning difficulties, it is recommended that the activities commissioned for Easter and summer take into account the wide range of needs and abilities of the young people who might choose to attend and to be clear about the commitment to accessibility within any marketing/promotional literature.

For those young people with physical and learning difficulties who access the service during term-time, it is recommended that the council signposts their parents/carers to the alternative provision available.

4. **Ethnicity**

The equalities data has identified the range of ethnicities attending the playgrounds. At Harebreaks the diversity recorded does not reflect the immediate area and it would be hoped that the new provision would encourage more representative use as well as encouraging young people of all ethnicities from across the borough. Given the data, there is no disproportionate impact on any one ethnic group.

At Harwoods, the registrations are more reflective of the surrounding community. The EIA does not find that there is a disproportionate impact on any one ethnic group as a result of the closure as there is not one ethnic group which is disproportionately using the facility (i.e. the percentage of Pakistani users and White non British users is in line with the surrounding community). However, given the level of ethnic minority use, this diversity should be encouraged in terms of the use of the new provision so that there is use by all ethnic groups within the community. This can be supported through the appropriate communications materials and channels to ensure that the messages about the provision are received across the community as a whole and targeted where appropriate to specific groups e.g. through community organisations, places of worship.

In addition, the activities planned for Easter and summer need to reflect the ethnic diversity of the borough and this is recommended as a factor to be taken into account in developing the programme.

5. Data on the family make up of the registered users of the APGs is not available. However, it would be expected that some of the registered users are from single parent families, where it is likely that the parent with the main caring responsibility is female. The change to provision is, therefore, likely to have a greater effect on women who are also the main carers of registered users and whose children use the supervised service. If the proposals go ahead, these parents will be able to access the Easter and summer activities programme proposed by the council as well as facilities in the borough that will be supervised including after school clubs.

6. Vulnerability is not identified as a protected characteristic under the Equality Act 2010 and the provision of children's services is a statutory duty for upper and single tier authorities (rather than a district council like Watford BC). In view of this, ensuring there is adequate identification and support for vulnerable young people in Watford is provided for by other agencies/organisations including Hertfordshire County Council and local schools and colleges. In terms of the activities programme that will be commissioned, the expectation would be that any commissioned organisation or individual is appropriately trained, qualified and checked in order to ensure protection for any young people engaging with the activities provided. In addition, the commissioned organisation or individual should be fully aware of where to signpost any issues relating to vulnerability should they arise whilst the programme is taking place.

7. Staff responsible for running the supervised service will be affected by the proposals. Consultation has been undertaken with the affected staff.

8. Overall conclusion

Meeting the Public Sector Equality Duty

This EIA has taken into account the council's public sector equality duty under s149 of the Equality Act 2010 and is intended to assist the council in meeting its duty. The council is required to have due regard to the need to:

- **eliminate discrimination, harassment, victimisation and any other conduct prohibited by the Act**

Although the removal of staff could mean that there is greater scope for anti-social and/or discriminatory behaviour between users of the playgrounds, measures would be put in place to deal with these behaviours should they arise. All the borough's outdoor play areas are monitored by the Park Ranger service (managed by Veolia) and the rangers can deal with issues as they arise and as notified. Where incidents are of a more serious nature, the borough has a very effective, multi-agency approach to tackling anti-social behaviour. Any issues that would be deemed anti-social behaviour would be reported through the council's Community Safety Co-ordinator. Organisations and individual commissioned to run and manage the Easter and summer holiday activities would be expected to demonstrate an understanding and commitment to equalities and the duties as set out in the Equality Act 2010.

- **advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share it**

The opportunity provided by the investment means that both playgrounds can be designed to maximise accessibility for 5-15 years at all times throughout the year. This will include not just the equipment installed but also the pathways and access to and around the site. The provision remains free and so there is no barrier created through affordability, and by creating stimulating, challenging and enjoyable play opportunities within safe, well-maintained environments, the council will be providing a service that will appeal to young people across the protected characteristics.

The play activities commissioned during the Easter and summer holidays will reflect the need to be accessible and to cater for a wide range of young people and abilities. In terms of young people with disability, this will include both physical and learning disabilities. In addition, these activities will be designed to meet the needs and reflect Watford's diverse community. Locations for these activities are yet to be confirmed but they will need to take into account areas which will advance equality of opportunity in terms of diverse neighbourhoods with a high number of young people.

There is likely to be a negative impact on parents/carers who currently leave children at the APGs under the supervision of staff. If the proposals are adopted they will no longer be able to do this, and this is likely to have a greater effect on women, who tend to be the primary carers of children during the day, and lower-income households. There are, however, other child care services in the borough and during the Easter and summer holidays the council will arrange for a programme of play activities.

- **foster good relations between persons who share relevant protected characteristics and persons who do not share it**

The changes to the playgrounds will broaden the offer available to young people from 5-15 year olds and their families. By providing facilities 24/7 throughout the year there will be more opportunity for young people to use the facilities and to engage with each other through play. As shown in the analysis of registrations there is a strong correlation between registered users of the facilities compared with the overall population of 5-15 year olds. The aim of the upgraded facilities will be to appeal to a far broader range of young people from across the borough thus meeting the duty to foster good relations between people who share a relevant protected characteristic and people who do not.

The quality and range of equipment on offer will also broaden the playgrounds appeal and encourage greater usage from across the borough – ultimately providing a ‘go to’ destination for young people and their families. The proposed designs include integrated picnic areas, a meeting space with seating, which will provide more opportunities for families to gather and be part of the new experience.

Overview of EIA findings

The proposals for the APGs are intended to deliver a universal, adventurous and accessible play offer for 5 – 15 year olds within the borough.

Through the installation of the new range of equipment the appeal of the offer in Watford will broaden, with the aim of attracting wider usage from young people across the town. The new provision will be accessible and designed to appeal to young people of all ages and abilities and remain sited at their current locations, minimising the impact to the immediate community whilst extending the offer to appeal to the wider area. The proposals help secure play provision for the older age range at a time when council budgets are under extreme pressure and when difficult decisions are being taken on services by councils across the country.

The absence of staff might mean that there is greater scope for anti-social and/or discriminatory behaviour between users of the playgrounds, but the Park Ranger service will be available to attend to complaints should they arise. For more serious anti-social behaviour, there is the council’s multi-agency approach, which has been successful in tackling incidents in the borough.

There is a potential negative impact for the current users who are accustomed to a supervised facility delivering play activities. However, there will still be arranged activities in the Easter and summer holidays, which are the most popular time for children to participate in organised play programmes. In addition, there are alternative supervised play facilities available in the borough.

The users of these facilities are the young people themselves and it is envisaged that the upgraded equipment and longer opening hours will appeal and strengthen the current play offer. The current playgrounds were not developed to provide childcare, particularly in terms of an after school offer. They are not promoted as such and alternatives are available to parents and carers looking for this type of amenity.

The overall conclusion of the EIA is that the positive impacts of the proposals outweigh the negative impacts, given the aim to expand take up to a wider number of young people within the borough, but there are recommendations to mitigate the negative impacts where possible. The council will seek to ensure the needs of children with disabilities are taken into account as are those of the

borough's diverse community. In particular, the EIA recommends the commissioned Easter and summer play activities actively respond to the equalities requirements of potential users.

Summary of potential positive impacts and ways in which they can be ensured

Positive Impact	Protected characteristics	Ways to ensure the positive impact
<p>1.</p> <p>Ensure the design and layout of the new APG provision are attractive, challenging and accessible to ensure they offer a 'destination of choice' for young people to enjoy with their families and friends</p>	<p>Age – younger people - 5 – 15 years age group</p> <p>Age – parents and carers of children within the 5 – 15 years age group</p>	<p>Challenge design team to develop proposals that will attract young people and adapt to differing abilities.</p>
<p>2.</p> <p>Ensure the equipment and layout of the new APG provision takes into account young people with disabilities</p>	<p>Age – younger people - 5 – 15 years age group</p> <p>Disability</p>	<p>Finalised proposals to include equipment for all abilities and that the layout is accessible. Test designs with appropriate users to ensure there are no barriers to participation either through the design or layout.</p> <p>New designs should be accessible to young people of all abilities within the 5-15 years age.</p> <p>Appropriate council officer should be able to signpost parents/carers of children with disabilities where a need is identified by the parent / carer for supervised provision.</p>

Positive Impact	Protected characteristics	Ways to ensure the positive impact
<p>3.</p> <p>Ensure that the benefits of the new provision are understood and communicated effectively to maximise take up once open.</p>	<p>Age – younger people - 5 – 15 years age group</p> <p>Age – parents and carers of children within the 5 – 15 years age group</p> <p>Disability</p>	<p>Communications plan to be developed in preparation for launch. Communications to ensure messages relevant to equalities be included and for the design / messages to be developed to ensure inclusion and no barriers to young people taking up the service (e.g. appropriate images / photographs)</p> <p>Undertake on site surveys once opened – recommendation is annually to assess satisfaction of users and to ensure there is take-up across the community.</p>
<p>4.</p> <p>Ensure the commissioned play activities in Easter and summer complement the play offer in the town, are accessible and meet the needs of young people; make sure the council complies with its duties under the Equality Act 2010</p>	<p>Age – younger people - 5 – 15 years age group</p> <p>Age – parents and carers of children within the 5 – 15 years age group</p> <p>Disability</p> <p>Ethnicity</p>	<p>Use data and information on the borough’s profile to support commissioning as well as ensuring a sound understanding of what is already on offer to ensure commissioned services meet the needs in the appropriate locations identified.</p> <p>Programme of activities developed for Easter and summer to take into account the needs of young people with disabilities both in terms of physical and learning disabilities. Also ensure commissioned services are sensitive to cultural and religious requirements and are reflective of the diverse profile of the borough.</p>

Positive Impact	Protected characteristics	Ways to ensure the positive impact
		<p>Feedback received from young people to date (August 2016) indicates an interest in a range of activities and the desire from the young people to ensure they are age appropriate. Location will also need careful consideration in terms of ensuring young people can access activities easily</p>

Summary of potential negative impacts and ways in which they can be removed or mitigated

Negative Impact	Protected characteristics	Ways to mitigate the negative impact
<p>1.</p> <p>The loss of the supervised play service for 5-15 year olds will impact on current users and their families. The new provision will not provide the supervised activities as has been experienced in the past.</p>	<p>Age – younger people - 5 – 15 years age group</p> <p>Age – parents and carers of children within the 5 – 15 years age group</p> <p>Sex – more single parent families have a woman as the main carer</p> <p>Ethnicity – Harwoods APG is situated in an area with a high BME community</p>	<p>Access to challenging and adventurous play for 5- 15 year olds is not diminished by the proposals – it is enhanced given the range of new equipment that will be accessible.</p> <p>Where parents / carers require supervised play provision there is alternative provision across the borough – the council has collated this and is in a position to advise parents / carers if necessary.</p> <p>Where parents / carers require childcare, including after school childcare, there is alternative provision across the borough and within the vicinity of the playgrounds – the council has collated this and is in a position to advise parents / carers if necessary.</p> <p>Continue to provide a programme of play activities during the Easter and summer holidays when young people have free time to take part. These should take into account the needs of young people with disabilities and be sensitive to cultural and religious requirements.</p> <p>Undertake on site surveys once opened –</p>

Negative Impact	Protected characteristics	Ways to mitigate the negative impact
		<p>recommendation is annually to assess satisfaction of users and to ensure there is take-up across the community.</p>
<p>2.</p> <p>Unsupervised play potentially leading to unacceptable behaviour in APGs including ASB and in terms of harassment, victimisation and discrimination and other prohibited conduct under Equality Act 2010</p>	<p>All</p>	<p>Evidence from play areas and parks within the borough shows this is not a major issue in Watford. Where issues do arise, the Park Rangers service run by Veolia is alerted and intervenes. If it is more than a minor incident the council's Community Safety Co-ordinator who helps coordinate a multi-agency response to issues in the borough relating to ASB and criminal activity is alerted and measures are in put in place. Incidents relating to discrimination, harassment victimisation and other prohibited conduct under Equality Act 2010 would be addressed in the same way.</p> <p>It is recommended that the Community Safety Co-ordinator monitors ASB etc and prohibited behaviour (such as discrimination, harassment and victimisation) in the area of the APGs once the supervised service has ended to provide early identification of issues and proactive intervention if necessary.</p> <p>It is also recommended that how to contact the Park Rangers is signposted on the council's website within the section on parks and open spaces and on signage at the playgrounds</p>

Negative Impact	Protected characteristics	Ways to mitigate the negative impact
<p>3.</p> <p>15 staff affected by change.</p>	<p>All</p>	<p>Consultation has taken place with affected staff and they have had an opportunity to feedback their views. The council's relevant policies were applied and assistance provided as requested through the employee assistance programme. Staff redundancy notices have been issued.</p>

This updated EIA has been approved by:

Alan Gough..... Date1 October 2016.....