

Equality Impact Assessment

Purpose of the Equality Impact Assessment process:

The Equality Act 2010 (the Act) introduced the [Public Sector Equality Duty](#) (PSED) requiring public bodies to give due regard to the need to:

- Eliminate unlawful discrimination
- Advance equality of opportunity
- Foster good relations

Consideration must be given to the protected characteristics covered by the Act. Assessments should consider relevant evidence relating to persons with protected characteristics in relation to assessments of potential impact.

The purpose of an Equality Impact Assessment (EIA) is to ensure that policies, functions, plans or decisions (hereafter referred to as 'policy/decision') do not create unnecessary barriers for people protected under the Act. Where negative impacts are identified these should be eliminated or minimised, and opportunities for positive impact should be maximised. An EIA is not required for a decision in relation to an individual.

Screening is a short exercise to determine whether a policy/decision is relevant to equalities, and if so, whether a full EIA should be conducted.

Section 1: Equality Impact Assessment Screening

Basic Details	
Title and description of the policy/decision:	Leisure Strategy – Active Together 2026-2030
Job title of the person(s) undertaking the assessment:	Operations Manager – Leisure
Council service:	Leisure
Date of assessment:	26 th May 2026

What are the aims, purposes, objectives and proposed outcomes of the policy/ decision?
The Leisure Strategy sets out the service aims to create a more inclusive and sustainable service reaching more people and engaging with a wider ranging audience.

Further Details	
Who may be affected by the policy/ decision?	Residents and visitors to Mid Devon, leisure service users.
How have stakeholders been involved in the development of the policy/ decision? E.g. a consultation exercise	Engagement with Active Devon, UK Active, external consultants TA6 (Alliance Leisure)
Will there be scope for prompt, independent reviews and appeals against decisions arising from the policy/decision?	Yes

To which part(s) of the Public Sector Equality Duties is the policy/ decision relevant:	Yes	No	Details
1. Eliminate unlawful discrimination	☒	☐	The strategy actively works to remove barriers, promote equal access, and ensure that no individual or group is treated less favourably, thereby contributing to the elimination of unlawful discrimination.
2. Advance equality of opportunity	☒	☐	Removal of barriers
3. Foster good relations between different groups	☒	☐	Close working partnerships with other agencies and community groups.

Which of the protected characteristics is the policy/ decision relevant to?
Tick and briefly describe any likely equalities impact (positive, negative, or neutral)

Characteristic	Positive	Negative	Neutral	Comments
Sex	☒	☐	☐	The strategy seeks to ensure that everyone, regardless of background or circumstance, has a fair and equal opportunity to access leisure services and achieve positive health outcomes.
Age	☒	☐	☐	The strategy seeks to ensure that everyone, regardless of background or circumstance, has a fair and equal opportunity to access leisure services and achieve positive health outcomes.
Disability	☒	☐	☐	The strategy seeks to ensure that everyone, regardless of background or circumstance, has a fair and equal opportunity to access leisure services and achieve positive health outcomes.
Religion or Belief	☒	☐	☐	The strategy seeks to ensure that everyone, regardless of background or circumstance, has a fair and equal opportunity to access leisure services and achieve positive health outcomes.
Race	☒	☐	☐	The strategy seeks to ensure that everyone, regardless of background or circumstance, has a fair and equal opportunity to access leisure services and achieve positive health outcomes.
Sexual Orientation	☒	☐	☐	The strategy seeks to ensure that everyone, regardless of background or circumstance, has a fair and equal opportunity to access leisure

Characteristic	Positive	Negative	Neutral	Comments
				services and achieve positive health outcomes.
Gender reassignment	☒	☐	☐	The strategy seeks to ensure that everyone, regardless of background or circumstance, has a fair and equal opportunity to access leisure services and achieve positive health outcomes.
Pregnancy/ maternity	☒	☐	☐	The strategy seeks to ensure that everyone, regardless of background or circumstance, has a fair and equal opportunity to access leisure services and achieve positive health outcomes.
Marriage and Civil partnership*	☒	☐	☐	The strategy seeks to ensure that everyone, regardless of background or circumstance, has a fair and equal opportunity to access leisure services and achieve positive health outcomes.

*Applies only to Employment and the duty to give regard to the elimination of discrimination.

Decision by Corporate Manager to recommend this policy/ decision for an Equality Impact Assessment?

Yes/ No

If the answer is “Yes”, please continue to the Section 2 and complete the Equality Impact Assessment. If the answer is “No”, please give a brief reason here.

The policy has the potential to directly and indirectly affect groups with protected characteristics and has clear positive equality implications.

EIA Screening Complete

Section 2: Equality Impact Assessment

Evidence and Consultation

What existing sources of information have you gathered to help identify how people covered by the protected characteristics may be affected by this policy/ decision? E.g. consultations, national or local data and/or research, complaints or customer feedback. Please identify any gaps in the available information that might make it difficult to form an opinion about the effect of the policy on different groups.

A range of existing data, research and engagement has been used to understand how people with protected characteristics may be impacted by the Leisure Strategy. These include:

- Local demographic data, including a latent demand report and local population profiles, to understand the composition of the Mid Devon district in terms of age, disability, ethnicity, and other protected characteristics.
- Public health data and needs assessments, such as Sport England Active Lives data and local health profiles, to identify inequalities in physical activity levels and health outcomes.
- Service usage data from existing leisure facilities, including membership, attendance and participation trends, which helps identify which groups are underrepresented.
- Customer feedback and consultation findings, including surveys and engagement with residents, user groups and community organisations.
- National policy and best practice guidance, including Sport England strategies and equality guidance, to benchmark inclusive approaches to leisure provision.
- Partner insights, including input from health partners, community groups and voluntary sector organisations who work directly with underrepresented populations.

Despite this, there are some gaps and limitations in the available information:

- Incomplete or limited data on certain protected characteristics, particularly for sexual orientation, religion or belief, and gender reassignment, where data is not routinely collected.
- Limited qualitative insight from some harder-to-reach groups, meaning their specific barriers and experiences may not be fully understood.
- Data gaps in casual or pay-and-play usage, where detailed demographic information is less consistently captured.
- Potential underrepresentation of non-users, as much of the available data relates to existing customers rather than those who do not currently engage with leisure services.

These gaps mean that, while a broad assessment can be made, there may be some uncertainty about the full impact of the strategy on all protected groups. The strategy therefore includes a commitment to ongoing monitoring, improved data

Evidence and Consultation
collection, and continued engagement to strengthen understanding and ensure that any inequalities are identified and addressed over time.

Please complete this table for all the Protected Characteristics. If you have identified any negative impacts you will need to consider how these can be justified or where possible mitigated either to reduce or remove them. (Please add rows where needed)

Protected Characteristic	Potential Impacts/ Issues Identified/ Opportunities identified	Mitigation required (action) or Justification	Lead Officer and target completion date	What is the expected outcome from the action?
Sex	The strategy supports increased and more equitable participation across sexes, helping to reduce inequalities in physical activity levels and associated health outcomes.	Monitor participation by gender and ensure inclusive promotion.	Leisure Operations Manager – Andy Mackie Ongoing	Improved wellbeing across all sexes and an inclusive environment.
Age	By offering inclusive, age-appropriate opportunities and addressing barriers such as confidence and accessibility, the strategy supports increased participation and improved wellbeing across the lifespan.	Monitor participation and membership take up to identify peaks and troughs in age groups.	Leisure Operations Manager – Andy Mackie Ongoing	Improved wellbeing across all ages and an inclusive environment.
Disability	The strategy has a positive impact on people with disabilities by promoting inclusive design and ensuring reasonable adjustments are embedded within facilities and services. This includes accessible environments,	Monitor participation, seek opportunity to collaborate with other community groups.	Leisure Operations Manager – Andy Mackie Ongoing	More inclusive facilities for all and inclusive timetabling.

Protected Characteristic	Potential Impacts/ Issues Identified/ Opportunities identified	Mitigation required (action) or Justification	Lead Officer and target completion date	What is the expected outcome from the action?
	adapted equipment, and targeted programmes to support participation. It also focuses on reducing barriers such as confidence, transport, and awareness, enabling disabled people to engage in physical activity and benefit from improved health and social outcomes.			
Religion or Belief	By promoting an inclusive environment and working with communities, the strategy helps ensure that services are accessible and appropriate for people of all faiths and beliefs.	Can be difficult to determine usage so consideration needs to be given to ensure inclusivity.	Leisure Operations Manager – Andy Mackie Ongoing	Improved wellbeing for all regardless of religion or belief and an inclusive environment.
Race	The strategy promotes equality for people from all ethnic backgrounds by working to reduce disparities in participation. It supports inclusive programming, culturally appropriate engagement, and community	Can be difficult to determine usage so consideration needs to be given to ensure inclusivity.	Leisure Operations Manager – Andy Mackie Ongoing	Improved wellbeing for all regardless of race and an inclusive environment.

Protected Characteristic	Potential Impacts/ Issues Identified/ Opportunities identified	Mitigation required (action) or Justification	Lead Officer and target completion date	What is the expected outcome from the action?
	outreach to ensure that leisure services are accessible and welcoming to diverse communities.			
Sexual Orientation	Staff training and clear policies help ensure that all individuals feel safe and respected when accessing leisure services. This encourages participation from LGBTQ+ communities and supports equal access to the benefits of physical activity.	Can be difficult to determine usage so consideration needs to be given to ensure inclusivity.	Leisure Operations Manager – Andy Mackie Ongoing	Improved wellbeing for all and an inclusive environment.
Gender Reassignment	By promoting inclusive, safe, and respectful environments within leisure facilities. It ensures that policies, staff training, and service delivery are non-discriminatory and inclusive, helping individuals feel confident and welcome when accessing services. This contributes to equal access	Signage changes and following UK Active guidance for leisure operators to ensure those who have undergone or are undergoing gender reassignment feel confident and comfortable in our centres.	Leisure Operations Manager – Andy Mackie Ongoing	Improved wellbeing for all and an inclusive environment.

Protected Characteristic	Potential Impacts/ Issues Identified/ Opportunities identified	Mitigation required (action) or Justification	Lead Officer and target completion date	What is the expected outcome from the action?
	and participation regardless of gender identity.			
Pregnancy/ maternity	The strategy positively impacts those who are pregnant or new parents by recognising their specific health and wellbeing needs. It supports access to appropriate activities, such as low-impact exercise and postnatal programmes, and promotes flexible participation options. This helps individuals maintain physical and mental wellbeing during and after pregnancy while reducing barriers to returning to activity.	Ensure appropriate classes and sessions are available.	Leisure Operations Manager – Andy Mackie Ongoing	Improved wellbeing for all and an inclusive environment.
Marriage and civil partnership*	The strategy ensures that individuals are not disadvantaged based on their marital or civil partnership status. Access to employment opportunities and services,	Can be difficult to determine usage so consideration needs to be given to ensure inclusivity.	Leisure Operations Manager – Andy Mackie Ongoing	Improved wellbeing for all and an inclusive environment.

Protected Characteristic	Potential Impacts/ Issues Identified/ Opportunities identified	Mitigation required (action) or Justification	Lead Officer and target completion date	What is the expected outcome from the action?
	pricing, is applied fairly and consistently, ensuring equal treatment for all users regardless of their circumstances.			

*(Applies only to employment and the duty to give regard to the elimination of discrimination).

Please provide details of arrangements to monitor and review the policy/decision and any mitigating actions or actions to promote equality:

The strategy and its success will be monitored through participation data, partner feedback, and routine service reviews. Any identified barriers will be addressed through targeted outreach and service adjustments to ensure the service remains inclusive, sustainable, and promotes equality.

Please state where the EIA will be published (e.g. on the Mid Devon District Council website):

**PDG report June 2026 – Leisure Strategy
Cabinet report July 2026 – Leisure Strategy**

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Equality Impact Assessment Sign off

For completion by Corporate Manager

Are you prepared to agree and sign off the EIA?

☒ **Yes** ☐ **No**

If “No”, provide details of why and next steps:

Name: Andy Mackie

Job Title: Leisure Operations Manager

Date: 27/05/26