

**Section 75 and Schedule 9
The Northern Ireland Act 1998**

**The Pricing Policy
for
Belfast City Council**

**An Equality Impact
Assessment**

March 20th 2002

The Pricing Policy for Belfast City Council

An Equality Impact Assessment

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The Pricing Policy for Belfast City Council

An Equality Impact Assessment

1: Introduction

Under the statutory duties contained within Section 75 of the Northern Ireland Act 1998, Belfast City Council gave an undertaking to carry out an equality impact assessment (EQIA) on each policy or group of co-joined policies where screening had indicated that there may be significant implications in relation to one or more of the nine equality dimensions.

This draft report has been made available as part of the **Formal Consultation** stage of the EQIA relating to the **Pricing Policy** and we would welcome any comments which you may have in terms of this EQIA and our preliminary recommendations with regard to measures to mitigate adverse impact and alternative policies.

If you have any queries about this document, and its availability in alternative formats (including Braille, disk and audio cassette, and in minority languages to meet the needs of those who are not fluent in English) then please contact:

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Deadline for comments will be **date to be added.**

Following consultation the Final Report will be made available by **date to be added.**

Section 75 and the Statutory Duties

Section 75 of the Northern Ireland Act 1998 requires each public authority, when carrying out its functions in relation to Northern Ireland, to have due regard to the need to promote equality of opportunity between nine categories of persons, namely

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- between men and women generally;
- between persons with a disability and persons without; and
- between persons with dependants and persons without

Without prejudice to its obligations above, the public authority must also have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

The Equality Commission for Northern Ireland approved Belfast City Council's Equality Scheme in April 2001. The Scheme outlines how the Council proposes to fulfill its statutory duties under Section 75. Following approval of the Scheme, existing policies were screened to assess impact on the promotion of equality of opportunity or the duty to promote good relations using the following criteria:

- Is there any evidence of higher or lower participation or uptake by different groups?
- Is there any evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy issue?
- Is there an opportunity to promote equality of opportunity between the relevant different groups, either by altering the policy, or by working with others in government or in the larger community, in the context of the policy?
- Have consultations with relevant groups, organisations or individuals indicated that policies of that type create problems specific to any relevant group?

A report describing the results of the screening process is available from the Council's Equality Officer.

Following screening, a schedule of EQIAs was drawn up and including the EQIA on the Pricing Policy which was scheduled for assessment in Year One.

Belfast City Council

Belfast City Council is the largest of the 26 district councils in Northern Ireland, serving a population of approximately 284,400 people (Registrar General's Office Statistics, 1999). The Council spends more than £100 million each year and directly employs more than 2,400 people.

The Council is responsible for the delivery of key services within Belfast and in particular those relating to:

- Refuse collection and disposal,
- Street cleansing,
- Health and environmental services,
- Community services,

- Indoor and outdoor leisure,
- Parks and recreational facilities,
- Support for the arts, tourism and economic development.

The City Council is structured around seven Departments, namely:

- Chief Executive's
- Client Services
- Contract Services
- Corporate Services
- Development
- Health and Environmental Services
- Legal Services

The Council operates through 102 operational locations across Belfast (for further details of these locations please contact the Policy Services Section, Belfast City Council)

Of these 102 locations, a considerable number are of relevance to the Pricing Policy insofar as a scale of charges operates for the use of facilities or services at that location (see below).

2: The Pricing Policy

In the Year 4 Update of the Corporate Plan, the Council commits itself to a vision of, 'working for and encouraging the continuous improvement of the City so that all its citizens can see Belfast becoming better' (Vision Statement, p.12).

In pursuance of this vision, the Council gives a commitment to work to make Belfast a place:

- Where there is effective civic leadership;
- Where customer focused council services are provided fairly for all;
- Where the views and concerns of all communities are sought and represented by the Council in its dealings with other bodies;
- Which is attractive with a high standard of health, cleanliness and consumer safety;
- Where there is a vibrant economy with all development carried out on a sustainable basis.

The Council is also committed to becoming a 'Best Value' organisation. This will involve subjecting all Council services to the requirements of the Best Value initiative. Under this initiative the Council must aim to, 'use public money more effectively: The right services need to be provided in the most efficient way. Our prices and charges must be competitive.'

In pursuance of the mission of the Council, and mindful of its Best Value objectives, the aim of the Council's pricing policy is:

'To operate a tariff of charges for the provision of facilities and services so as to recoup a reasonable proportion of the Council's expenditure while acting in a fair and equitable manner towards both residents and visitors to the City.'

For the purposes of this EQIA, the policy has been restricted to those facilities and services where the Council is able to operate some discretion in the levying of charges. Therefore services which operate a scale of charges according to statutory provisions (e.g. Building Control, Registry Office) are not included.

The following services and facilities are considered within the scope of the Pricing Policy:

- **Community Centre Charges** (Ardoyne; Concorde; Dee Street; Divis; Donegall Pass; Duncairn; Finaghy; Glen Road; Hammer; Highfield; Horn Drive; Inverary; Knocknagoney; Ligoniel; Markets; Morton; North Queen Street; Olympia; Sandy Row; Suffolk; Whiterock; Woodvale)
- **Leisure Centre Charges** (Andersonstown, Whiterock, Olympia, Beechmount, Falls, Shankill, Ballysillan, Loughside, Grove, Maysfield, Ozone/Tennis Arena/Laserquest, Avoniel, Ballymacarrett)
- **Ulster Hall / Group Theatre Charges**
- **Belfast City Hall**
- **Belfast Zoo Charges**
- **Belfast Castle Charges**
- **Malone House Charges**
- **Cemeteries and Crematoria Charges** (City, Dundonald, Roselawn)
- **Cave Hill Adventure Playground Charges**
- **Nature Study Centre Charges**
- **Blanchflower Stadium Charges**
- **Belfast Parks Golf Course Charges**
- **Outdoor Leisure Charges** (Alexandra Park, Ballysillan P/F, Botanic Park, Boucher Road P/F, City of Belfast P/F, Cherryvale P/F, Clara Park P/F, Cliftonville P/F, Dixon P/F, Falls Park, Grove P/F, King George V P/F, Loughside P/F, Mallusk P/F, Musgrave Park, Orangefield P/F, Ormeau P/F, Shore Road P/F, Strangford

P/F, Suffolk P/F, Victoria Park, Wedderburn Park, Woodvale Park, Woodlands P/F)

- **Allotments Charges**
- **Barbecues Charges**
- **Belfast Waterfront Hall Charges**
- **Management Agreements:**
 - **Mary Peters Track Management Agreement with Athletics (UK) Ltd**
 - **Tommy Patton Memorial Park Management Agreement with East Belfast Football Club**
 - **Ulidia Playing Fields Management Agreement with Rosario Youth Club**
 - **Shore Road Playing Fields Management Agreement with Grove United Football Club**
- **Ormeau Golf Club Leasing Agreement with the Trustees of Ormeau Golf Club**
- **Shaftesbury Centre Leasing Agreement with Lower Ormeau and Markets Community Forum**
- **Grosvenor Centre Leasing Agreement with Roden Street Community Development Group Ltd**

For the majority of these facilities the pricing schedule strives to maintain a fair balance between generating income and encouraging participation. Accordingly it is recognised that many facilities or services may continue to operate at a net cost to the Council.

Exceptional arrangements are listed below:

Belfast City Hall

The Council does not charge for City Hall tours. The Council permits the use of the City Hall for functions. It charges for non-civic functions held outside normal hours or at the weekend or bank holiday to recover costs necessarily incurred (i.e. extra security, lighting, electricity). At present the charges are £650 for Reception and Banquet Hall and £1250 for Reception, Banquet Hall and Great Hall (the Head of Civic Buildings and Property Care has a discretion to make a smaller nominal charge for example if the function is for two hours only in the Reception Hall).

Belfast Waterfront Hall

Although operating at a net cost to the Council, the Waterfront Hall operates within a commercial environment, charges are set to reflect the Hall's position in the marketplace, taking into account the need to be competitive and to ensure adequate income is generated to operate within the financial targets agreed by Council.

Management Agreements

Mary Peters Track

In 1998 the Council entered into a three year Management Agreement with Athletics (NI) Ltd such that the Council pays an annual fee to the company in

consideration of the company managing the track. Members of the public, sporting clubs and groups are still entitled to use the facilities of the track, subject to payment of entry charges fixed by the Council. Any public charges collected directly by Athletics (NI) are retained in part consideration of the company undertaking all administrative responsibilities in connection with the public use of the track.

Tommy Patton Memorial Park

In August 2000 the Council entered into a similar management agreement with East Belfast Football Club such that the Council pays an annual management fee to the Club. Members of the public, sporting clubs and groups can continue to use the facilities, subject to user charges fixed by the Council.

Shore Road Playing Fields

In August 1998 the Council entered into a management agreement with Grove United Football Club such that the Council pays an annual management fee to the Club. . Members of the public, sporting clubs and groups can continue to use the facilities, subject to user charges fixed by the Council.

Ulidia Playing Fields

In August 2000 the Council entered into a management agreement with Rosario Youth Club such that the Council pays an annual management fee to the Club. Members of the public, sporting clubs and groups can continue to use the facilities, subject to user charges fixed by the Council.

Ormeau Golf Club

In 1990 the Trustees of the golf club leased the land from the Council for an annual rent. Members of the public can play the course on payment of a green fee, which is determined by the Council in consultation with the Club.

Shaftesbury and Grosvenor Centres

The leases require the lessees to pay a yearly rent to the Council. The leases do not contain any clauses relating to charges.

Relevant Legislation

Other than the equality and community relations duties placed on the Council under the existing anti-discrimination legislation and Section 75 of the Northern Ireland Act 1998, the following specific pieces of legislation are also of relevance to the Pricing Policy:

The Local Government Act (Northern Ireland) 1972 outlines the principal functions of Councils but does not make any direct reference to charging for services or facilities.

The Recreation and Youth Service (NI) Order 1986 requires each district council to secure the provision of adequate facilities for recreational, social, physical and cultural activities and for that purpose may, either alone or together with another district council or any other person –

- (a) establish, maintain and manage any such facilities;
- (b) organise any such activities
- (c) assist, by financial contributions or otherwise, any person to establish, maintain and manage any such facilities or to organize any such activities;
- (d) provide, or assist by financial contribution or otherwise in the provision of, leaders for such activities; and
- (e) defray or contribute towards the expenses of any persons taking part in any such activities.

Private Sector Franchises

While the Council is able to operate discretion in the scale of charges which apply to the use of its facilities, a number of franchises have been granted to private sector organisations for the provision of services at various Council locations (e.g. catering). The charges which these companies operate are not under the control of the Council although the Council would consider the proposed charges as part of the tendering process in terms of the appropriateness for the facility. (The general operation of these franchises will be considered in greater detail as part of the Council's equality impact assessment dealing with procurement.)

3: Consideration of Available Data and Research

In conducting this EQIA the Council took fully into account data and research findings from the following sources.

(i) *Baseline Data*

Each year the Council prepares a 'baseline profile' of Belfast, bringing together statistical information from a variety of sources. In terms of Section 75 obligations, the following summary statistics may be of interest:

- Belfast contains a higher proportion of members of ethnic minority groups than Northern Ireland as a whole. For example, It is estimated that 40 per cent of the NI Chinese community, 25 per cent of the Pakistani community and 10 per cent of the Indian community live in Belfast
- Belfast has a higher proportion of households with no earners and a lower proportion of two income households compared with the rest of Northern Ireland
- A quarter of Belfast's population is under 16 years old and almost 20 per cent are over 65. The structure of the population has changed little in the past nine years
- Belfast contains nine of the top ten most deprived wards in Northern Ireland in terms of multiple deprivation.
- 12 of the 51 wards account for 40 per cent of unemployment in the City
- The 10 worst wards in Northern Ireland in terms of poor health are in Belfast City
- The majority of Belfast people feel that the worst things about living in the City are the levels of violence and sectarianism.

- The number of reported racist crimes in the City increased from 39 in 1996 to 195 in 1999.

(ii) **Service Reviews**

The Council is mid-way through a five-year programme of service review, using a methodology developed by the Council and based on best practice across the UK. These reviews address the 5 Cs of best value (challenge; consult; compare; compete; collaborate). For example, the Year Two service reviews for Client Services and Corporate Services have identified measures to increase visitor numbers and income for the zoo and new procedures in relation to marketing/promoting the City Hall. Both these changes may have an impact on the Pricing Policy and will be considered within the EQIA.

The Best Value Review of the Parks and Amenities Section of the Council has identified increasing income as an improvement priority. The charge rates for the crematorium were found to be the lowest in the United Kingdom. An analysis of the number of burials and expenditure indicated that overall the 321 authorities had an average of 55% for income as a percentage of expenditure compared with 23% for Belfast. It is significant that consultation of users indicated that Belfast's combined service was ranked joint 2nd in terms of the Charter for the Bereaved.

Performance Improvement Plans have been adopted for both Outdoor and Indoor Leisure.

For Indoor Leisure, the Plan commits to, 'continually measure performance data and the management processes against appropriate benchmarking partners.' (p.43) Benchmarking has taken place with 19 other councils and this indicates that Belfast's gross leisure spend per head of population was the third highest of councils in NI and net expenditure per head was the second highest and 52% above the NI Council average. The Council's income as a proportion of its expenditure in 1998/99 was 24.35%.

For Outdoor Leisure, the Plan commits to an improvement of the present system of budgetary control. Benchmarking has taken place with other councils (i.e. Castlereagh, Derry and Lisburn) and indicates that although hiring rates for grass pitches are highest in Belfast, for bowling Belfast has the second lowest annual subscription for people over 60 and overall, 'the charges levied are significantly short of the total costs of providing the facility.' (p.30). The plan commits to further benchmark with councils already mentioned, province-wide and in the UK.

For the Waterfront Hall, a Best Value consultation exercise is due for completion in April 2002. This should provide relevant information on pricing.

A recent meeting of the Waterfront Hall Disabled Working Group considered the Hall's pricing structure. One of the participants felt it was unfair that people

- Leisure Centres (*Andersonstown, Whiterock, Olympia, Beechmount, Falls, Shankill, Ballysillan, Loughside, Grove, Maysfield, Ozone/Tennis Arena/Laserquest, Avoniel, Ballymacarrett*)
- Ulster Hall / Group Theatre
- Allotments
- Barbecues
- Belfast Zoo
- Belfast Castle
- Malone House
- Cemeteries and Crematoria (*City, Dundonald, Roselawn*)
- Cave Hill Adventure Playground
- Nature Study Centre
- Blanchflower Stadium
- Belfast Parks Golf Course
- Outdoor Leisure (*City of Belfast P/F, Cherryvale P/F, Clara Park P/F, Dixon P/F, Grove P/F, King George V P/F, Orangefield P/F, Ormeau P/F, Shore Road P/F*)
- Belfast Waterfront Hall

(A common schedule of charges applies to each of the groups of facilities and/or services which has been listed above. Where no charges are levied then that facility or service has not been included.)

Within these groups, with regard to the nine equality categories the following differential charges have been extracted:

Community Centres:

Room hire – The Council operates a unique set of hire charges for each of the 22 Community Centres listed. For Main Halls these range from £1.80 per hour to £6.70 at peak times. Halls may be hired for use between 9.00am and 7.00pm with higher peak rates applicable between 7.00pm and midnight (off peak rates are approximately 60-65% of the peak rates). The higher rates charged for evening use are due to higher staff costs plus additional heating and lighting costs.

The Council imposes charges for community centre use which aim to recover 25 per cent of the gross cost to the Council of running each centre. This cost comprises the following:

- Notional rental value
- Staff costs
- Heating, lighting, cleaning
- Rates (if any)
- Repairs
- A percentage of the capital cost of equipment
- Insurance
- Ground rent
- Miscellaneous expenses

Groups involved in community development activities qualify for free use of facilities. Community development activity is defined as:-

The Project/Group is meeting an identified need in the local area, this will include relevant sporting and cultural activities.

The Project/Group promotes positive responses to local needs (this means there is no element of personal financial gain for the organisation).

The Project/Group involves local participation /voluntary input.

The Project/Group is not a duplication of an existing facility.

The Project/Group is of clear benefit to the local community.

The Project/Group is non profit making.

The Project/Group is not in receipt of grant aid.

Groups who attract grant aid for running costs or have an income are charged at normal rate. Statutory organisations are charged at double rate and Commercial Groups are charged at 4 times normal rate. Alcohol functions are restricted to Community Centre Committee or User Group functions and are charged at half normal rate. Any outside of normal opening hours use for a community development activity is free. Any other outside of normal opening hours use is charged the appropriate rate plus the relevant staff overtime costs.

Leisure Centres:

Membership – Annual membership fees for adults are £237 (peak) and £106 (off-peak), for juveniles (defined as under 18 for all leisure activities unless specified) £67.50 (peak) and £30.00 (off-peak) and for full-time students £115.00 (any time). Family membership has been abandoned as no longer required due to the introduction of the “additional family member” concession which provides a 50% reduction in full cost for the appropriate category (for example, each additional adult family member will be charged at 50% of the appropriate adult rate). Annual swimming membership fee for adults is £93.25 and “additional family member” 50% reduction rates apply as outlined above.

Hall hire – Hall hire charges vary from £57.60 (peak) and £42.75 (off-peak) at Maysfield and Shankill, to £43.20 (peak) and £32.00 (off-peak) at Andersonstown, Avoniel and Ballysillan, to £33.00 (peak) and £26.75 (off-peak) at Beechmount and £21.60 (peak) and £16.00 (off-peak) at all other centres except Grove Top Hall (£13.50 & £9.75), Minor Hall and Maysfield lagan Suite (£17.50 & £13.50), Maysfield Long Hall (£16.50 & £12.50) and the Committee Room (£12.50 & £10.50)

The rate charged for sports hall hire is based on the number of badminton courts in that particular sports hall. All sports halls in every Leisure and Recreation Centre are marked out for a number of sports, but always for badminton. The minimum unit which can be booked out at one time, is one badminton court. Therefore, if a hall has 4 badminton courts the cost of hire of the entire hall is - *Cost of 1 badminton court × 4.*

Grove – Special charges apply for Irish/Ulster Water Polo Squad Training (£35.00).

Outdoor facilities – For hard porous pitch, pitches with lights, synthetic surfaces, lit and unlit 5-a-side courts, and tennis courts all juvenile rates are half the adult rate. The athletic track rate per session is: adult £44.50 (peak), £33.50 (off-peak). The juvenile rate is £27.25 (peak) and £20.50 (off peak)

Indoor activities – For squash, handball, badminton and the health and fitness suite, juvenile rates are half the equivalent adult rates. For table tennis the juvenile rate at peak times is 50% of the adult rate but at off peak times the adult rate is £ 1.80 and the juvenile rate is £1.10. For swimming, adult rates are £2.20 (peak) and £1.70 (off-peak); juvenile rates are £1.20 (peak) and £0.90 (off-peak). People over 60 years and persons with a disability are £0.80 at peak times and free use is given at off peak times during week days only. General activity sessions of 1-2 hours, Tier 1 – adult £3.20, juvenile £1.80, students /unemployed £1.70, Tier 2 adult £2.80, juvenile £1.60 student / unemployed £1.60, Tier 3 adult £2.30, juvenile £1.70, students / unemployed £1.50. For swimming, family sessions (family of four including at least one adult), £4.65, learn to swim (8 weeks) adult £32.00, juvenile £24.50. Centre-based swimming club, 8 week session £24.75 with no juvenile concession. Centre based swimming club per lesson £1.75 with no juvenile concession. A juvenile group swim rate for groups of 10 or more £1.00. Disabled groups may be offered free use of facilities within centres for one hour per week. There is no concessionary rate for juveniles in relation to snooker/billiards, bowls, sauna/steam room/spa pool or sunbeds.

Tennis arena – Annual membership fees for adults are £262.50 (peak) and £108 (off-peak), for juveniles £165 (peak) and £51.50 (off-peak) and for full-time students £112.50 (any time). Guest charges for adults and juveniles, £4.10 peak and £2.15 off-peak. Court hire for adults £15.50 (peak) and £8.65 (off-peak), juveniles / concessionary (the unemployed, people with a disability and those aged 60 or over, £15.50 (peak), £4.30 (off-peak), family price (must have at least one juvenile player) is 75% of the adult rate £11.65 (peak), £6.45 (off-peak), school groups are at the adult rate £15.50 (peak), £4.30 (off-peak). Wheel chair coaching £11.65 (peak). Beginner/improver courses, adult £39.00 (peak), £30.25 (off-peak), juvenile, student, unemployed, people over 60, £30.30 (peak), £19.50 (off-peak). Advanced courses, adult £49.50 (peak), £38.75 (off-peak), juvenile, student, unemployed, those aged 60 or over ??? (peak), £30.25 (off-peak).

Ozone Climbing Wall - Annual adult membership £205 (peak), £72.00 (off-peak), juvenile £110.00 (peak), £37.00 (off-peak). For the joining fee and session charges the juvenile fee is 50% of the adult fee. Guest charges for adults are £0.80, juveniles £0.60, while group rates for adults are £2.75, juvenile £1.75, courses (8 week) adult £40.00, juvenile £20.00.

Ulster Hall / Group Theatre:

For single sessions, commercial events £1210, public, voluntary charity event £605, rehearsals £470, 'Sunday Religious Services' £200.

Belfast Zoo:

Adults £6.00 (summer), £5.00 (winter); people over 60, people with a disability, those aged under 4, free; children aged 4-18, £3.00 (summer), £2.50 (winter). Adult season ticket £18.00, child season ticket £9.00, family season ticket £49.50. Family day ticket (2 adults, 2 children) £16.50 (summer), £13.50 (winter)

Belfast Castle / Malone House:

20% reductions for wedding receptions Monday-Wednesday (20% discount in general Jan – Feb)

Cemeteries and Crematoria:

Separate tariffs for Belfast residents and non-residents. Surcharge of £59 levied on all cremations on Saturdays and public holidays. Cremation of child under one, £35.00; 1 – 16 years, £75.00; over 16 £135.00 (Belfast residents)

Outdoor Leisure:

Bowling – season ticket for adults £34.50, for those aged over 60 £11.40 (limited use £5.70), juvenile £10.30, unemployed £11.40.

Cricket – juvenile rates are half the adult rate for hire of all pitches

Cycling – Adult season ticket £10.80, juvenile £5.50, per session adult £1.30, juvenile £0.80

Grass sports pitches – Grade A pitches adult fee per 2 hours £27.90 (with lights £68.40), juvenile £14.50 (with lights £47.80). Grade B pitches juvenile rates are half adult rates.

Golf course – Adult membership fee £224.50, juvenile £97.80, over 60 years £106.10. Daily green fees, adult £7.50, juvenile £4.00, over 60s £4.50.

Weekend and holidays, £10.00 for all. Putting, adult £1.20, juvenile £0.90.

Belfast Waterfront Hall

Reduced rates for registered charities. 10% supplement for Friday/Saturday/Sunday.

Concessionary rates are set where the Waterfront Hall management itself promotes a concert. These are based on a reduction of between £0.50 and £2.00 off the full ticket price. Those eligible for concessionary ticket prices are defined as follows:

- Persons aged 60 years and over
- Persons with a disability
- Unemployed
- Students (those in full-time education)
- Children (aged 16 years and under)

In addition a family ticket price can be set for appropriate shows. This covers a maximum of four tickets – 2 adults, 2 children or 1 adult, 3 children. The actual price set for this type of ticket would normally be no more than the cost of three standard face value tickets.

Children under the age of three are not admitted to events except to productions aimed specifically at children.

Student standby tickets on selected performances are available 15 minutes prior to commencement for £5.00.

Mary Peters Track:

Adults per peak session £43.25 (£32.45 off-peak), juveniles £26.50 (£18.80 off-peak)

(v) Users' Monitoring Data

All available data relating to the profile of current users of each facility or service is included in Section 4, wherever possible broken down by the nine equality categories. This information is significant not only for identifying those who use the services but also those who do not.

(vi) Public Consultation Surveys 1999 & 2001

In 1999 and again in 2001 the Council commissioned public consultation exercises with 1,500 citizens of Belfast. The face-to-face interview survey, carried out in the respondent's home, was designed to obtain views about:

- How well the Council performs as an organisation
- The importance of and satisfaction with services provided
- What does, or could, make Belfast a better place to live

Both survey samples were structured by age, gender, religion, social class and electoral ward, and were followed up by focus groups with residents' groups.

The 1999 survey revealed that 68 per cent of residents sampled were satisfied with the work of the Council and only 13 per cent felt that the Council did not provide value for money. The only notable difference in overall satisfaction was seen in the Lower Falls area where only 37 per cent said they were satisfied with the Council but none of the issues raised were related to the Council's Pricing Policy.

With particular reference to the question, 'How strongly do you agree or disagree with the statement that BCC provides ratepayers with good value for money?', 46 per cent of respondents agreed that the Council provided good value for money. Of the 13 per cent who disagreed with the statement, the highest proportion was in the Lower Falls (20%) and Castle (24%) electoral wards. The Lower Falls focus group mentioned poor appearance of pavements, the general appearance of the area and delays in repairs to wheelie bins while Castle residents highlighted litter and the general appearance of their area but neither made spontaneous reference to pricing issues. In terms of general satisfaction with the City and their area it is noteworthy that no mention was made of pricing. Eight focus groups, selected on the basis of the introduction of Section 75, were set up in total, with four looking at issues which were important from the perspective of:

- Persons with a disability
- Ethnic minorities

- Gay / Lesbian
- Young People

Once more no issues relating to pricing emerged, other than those people with a disability felt they would like to have a say in the decisions that affect them and young people felt that facilities could be better targeted towards their age group. Overall, although the survey did not specifically address pricing issues the absence of comment in relation to the pricing policy should not be ignored.

In 2001 the Council conducted its second consultation exercise with 1523 residents of Belfast, followed by ten focus groups. Overall satisfaction with the Council had increased to 71 per cent and while a number of significant issues did emerge, once more pricing was not highlighted. For example, when asked to comment on satisfaction with indoor leisure services and outdoor sports grounds, cleanliness, maintenance and availability were signaled but no mention was made of pricing.

On this occasion the focus groups were deliberately structured with all Section 75 categories in mind (i.e. ethnicity, disability, older people, younger people, people with dependants, sexual orientation). Participants with dependants maintained that they would like to see the Council implement changes related to the provision of more indoor facilities and for a wider range of organised activity at these centres. It was suggested that the Council should tell young people what is happening in their areas (at leisure centres etc.) so that they would have more knowledge of the choice of activities being made available. A further group (sexual orientation) mentioned that the cost of leisure services was too high and, even taking into account concession prices, remained too expensive.

Overall, pricing issues did not emerge spontaneously during discussions on many occasions, other than one person who felt that facilities should be free for those aged over-65s and one person who commented positively on the price-freeze at leisure centres, and that they offered 'good value'.

More generally in both surveys there was a feeling that there were few facilities available for younger people. While this finding may not relate directly to the Pricing Policy, it may have implications for the current pricing schedules.

(viii) Complaints

A systematic review of all complaints received by the Council since 1998 was undertaken to determine levels of dissatisfaction with existing arrangements for pricing. Unfortunately at the present time the Corporate Complaints Procedure does not incorporate complaints specifically about pricing. (This is an issue which is taken up under 'Consideration of Measures to Mitigate any Adverse Impact' below.)

(ix) Public Pre-consultation Meeting

During the course of data gathering for the EQIA, a pre-consultation meeting was organised, to which representatives of groups associated with each of the nine equality dimensions were invited. Those in attendance at that meeting specifically represented persons with a disability, different sexual orientations and ethnic minorities.

A number of themes were introduced for discussion and comment. Issues raised by the three representatives in relation to these themes included the following:

The charges for cremations and burials where the Council charges higher rates to non-Belfast residents and additional charges for Saturdays and Bank Holidays.

Comments:

Consultees wished to have the definition of residency clarified so as to include either ratepayers or those residing within the City boundaries. It was felt that the issue of how asylum seekers and nomadic groups (e.g. Travellers) could prove residency should be addressed.

The differential rates for cremation were felt to be unfair as there is only one crematorium available in Northern Ireland. Further consultation with the Interfaith Forum was suggested to obtain information on those religions who cremate their dead, and this will be included at the stage of Formal Consultation. A further issue was raised regarding public health requirements to cremate (e.g. Aids/HIV, CJD).

For older people and especially those suffering from Alzheimer's Disease, the prospect of moving to nursing homes outside the City boundaries may impact on charges.

It was argued that further consultation should be carried out with the Age Sector Reference Group and the Interfaith Forum to identify outstanding issues, and the Council has committed to including these consultees in subsequent rounds of consultation.

The off-peak prices which operate in leisure and recreation centres at certain periods.

Comments:

It was felt that off-peak pricing in general could operate as a positive action measure (e.g. for members of the Chinese community who work in the evenings). It was also felt that the Council could be receptive to approaches from groups for concessionary rates and especially in off-peak periods. It must be ensured that restricted activities (e.g. single-gender sessions, women-only swimming) are not scheduled only in peak times.

The concessionary rates for juveniles, those aged 60 and over, the unemployed and those rates charged to persons with a disability.

Comments

It was argued that the process for classifying those eligible for concessionary rates should be consistent and transparent. This should involve completion of

a standard form which is stamped by the appropriate authority and is then valid for a set period of time.

It was felt that there is a need to publicise the availability of concessionary rates among targeted groups.

Concessionary rates should also be extended to those who are significant carers.

Annual membership fees may disadvantage those who are unemployed or on low wages although there is a monthly direct debit mechanism in place to spread the costs.

General Issues

Comments

It was felt that while a common and consistent charging schedule should continue to operate, the scheme should allow for flexibility in exceptional circumstances.

Desk staff and other 'gatekeepers' must be trained to ensure a standard approach is adopted to pricing across the facilities.

The application process for concessionary rates must be applied systematically to avoid stigma or embarrassment and those responsible for implementing the process must be trained.

Appropriate means of identification should be clarified with all appropriate authorities and including NICEM in the case of asylum seekers.

4: Assessment of Impact

A review of existing data does not suggest that the Council's pricing policy has been a cause for concern among residents of Belfast, and it is not immediately apparent how the pricing schedules may have adversely impacted on any of the nine equality categories. Indeed the actions of the Council, rather than having an adverse impact, have been directed towards providing concessions for a number of the equality categories in order to promote equality of opportunity. This impact assessment primarily will deal with issues arising over the consistency of the Council's practice with regard to concessions. However, mindful of the duty to promote equality of opportunity and good relations it was felt important to review the pricing schedules which operate at each location to consider whether adverse impact may occur.

An assessment of the possible impacts of the Council's Pricing Policy in terms of the nine equality dimensions is set out below.

Religious Belief.

The physical distribution of operational locations across Belfast is not the focus of this EQIA but instead the charges which are levied for facilities and services at each location. In general the charges are based on objective criteria as outlined in section 3 (iv) above and it is not likely that the different charges for Council facilities have an adverse impact on grounds of religion. However, should economic disadvantage in certain areas make it less likely that Council facilities and services will be used then it still may be appropriate to consider the impact of the scale of charges on uptake of facilities and to monitor uptake with this consideration in mind. At the same time while the 1999 Public Consultation survey did indicate higher levels of dissatisfaction in two areas (Lower Falls and Castle), the 2001 survey failed to replicate this finding and in general the lack of reference to pricing may be a significant indicator of general satisfaction with current arrangements. Also, it is important to note that the Council does operate a schedule of concessionary rates and off-peak rates which are designed to target disadvantaged groups. With this in mind it was not felt appropriate to make a recommendation to alter the policy to accommodate this concern.

Historically, the rate charged for the use of the Ulster Hall / Group Theatre for Sunday Religious Services may reflect the position that use of the venue was only sought for these purposes. At the present time, this venue is available for other purposes on Sundays but the Council has yet to fix rates, nor has a rate been fixed for religious services which may not fall on a Sunday. These issues will be addressed as a result of the EQIA.

In the past concessions for the unemployed have been given in some but not all Council facilities. The use of 'unemployed' as a category can result in an adverse impact on Protestants [PLEASE EXPLAIN] and women who are not in employment but are not registered unemployed (i.e. not economically active). The Council provides these concessions as part of its policy to target social need but how this policy operates i.e. who should be granted concessions, what proof of employment status could be used and at which venues, are all issues which should be addressed within this EQIA.

The surcharge of £59.00 for Saturday and public holidays cremations and burials may adversely affect certain religions. The Council is committed to further consultation to consider any possible consequences of particular religious practices which may be associated with burial or cremation.

Political Opinion.

It is not likely that the Council's Pricing Policy will have an adverse impact in terms of political opinion.

Racial Group.

Pre-consultation indicated that the current scheme for identifying those entitled to concessionary rates on grounds of employment status and residency may have an adverse impact on certain ethnic minorities (e.g. nomadic groups, asylum seekers), and means for addressing these concerns will be considered further during consultation.

Since most members of ethnic minorities live within Belfast City Council area they are unlikely to be adversely affected by the additional charge levied for burials to those outside Belfast.

Age.

Traditionally, the Council has offered different concessionary rates at different venues and while attempts have been made to standardise procedures over recent years, the EQIA affords an opportunity to harmonise rates across council facilities.

Those who live outside Belfast must pay higher fees for burial or cremation. Pre-consultation suggested that this may have an adverse impact on older people who have moved outside the City boundary for nursing or residential care, and this issue must be addressed. Cremation rates differentiate by age group with a different rate for those aged under 1 year and under 16, and while this difference is noted it was felt to be justifiable on grounds of expenditure costs.

No concessionary rates currently are given on grounds of age in the hire of halls or rooms, equipment, seating.

Marital Status

It is not likely that the Council's Pricing Policy will have an adverse impact in terms of marital status. Issues of family status are addressed under the heading of Dependants.

Sexual Orientation.

It is not likely that the Council's Pricing Policy will have an adverse impact in terms of sexual orientation.

Gender

The use of the term "unemployed" as a concessionary category may adversely impact on women who may not be "in employment" but who are not unemployed. At the stage of Formal Consultation, the Council will seek the views of interested groups on the definition of "unemployed" and whether this could be modified and if so how employment status and entitlement to a concession would be proven. This information will be used to bring forward recommendations in the final published report.

A concessionary rate is offered at leisure centres for those in 'full-time' education. This has the potential to adversely impact on women. The intention of the policy is to provide concessions to those in need therefore the wording of the concession will require re-assessment to deal with those full-time or part-time students who are not in employment. Once more views will be sought through consultation on how entitlement to such a concession would be proven.

Where leisure or community centres offer courses which are specified as being for one gender only then the implications must be explored in relation to

the Pricing Policy. Pre-consultation indicated that if single gender courses are scheduled only during 'peak' times then this may have an adverse impact on those who participate.

Disability.

Concessions in the past have been offered at some venues to those persons with a disability. For example, in leisure centres disabled groups may be offered the free use of facilities (where appropriate but excluding sunbeds) within the centres for one hour per week, and persons with a disability have free admission to the zoo. In the Waterfront Hall a reduction in price is given for persons with a disability.

There is no general definition of disability currently used by the Council. The definition of disability under the Disability Discrimination Act 1995 is a medical test and depends upon each individual's circumstances. It includes both mental and physical impairments. In practice the concession has been offered to those in receipt of Disability Living Allowance, and the Council will seek further views as to which definition is most appropriate in relation to its Pricing Policy, with the objective of applying a standard definition consistently across facilities.

The Council would wish to endorse its current policy of allowing free use of leisure centres to groups of disabled persons where this use is linked to therapeutic measures.

The Council seeks views on whether the zoo concession (i.e. no charge for persons with a disability) should either be continued, discontinued or extended to other facilities, mindful that a concession may be inappropriate and could appear patronising and that a person with a disability who is not in work would be in a position to avail of the concession for those who are not in paid employment. The Council wishes to welcome persons with a disability to use its facilities but wishes to gather further views on the appropriateness of the concessions.

The Council is of the opinion that to offer preferential treatment to persons who have a disability is not an adverse impact rather it is a measure intended to increase equality of opportunity and it is lawful.

Views are welcome on public health concern requirements for cremation and whether this has any adverse impact on grounds of disability.

Dependants.

In its Pricing Policy in relation to leisure the Council has identified 'family membership' as 2 adults and 2 children but at present the application of this concession is not uniform. For example, the above definition applies to the zoo family day ticket but it is not clear whether this applies to the season ticket. The Waterfront Hall identifies a family unit as a maximum of 4, either 2 adults and 2 children or 1 adult and 3 children while for swimming a 'family of four' session must include one adult. No concessions are given for outdoor leisure, tennis, ozone, laser quest and climbing.

The Council is of the opinion that to offer preferential treatment to persons who have dependants is not adverse impact against those who do not have dependants rather it is a measure intended to increase equality of opportunity and it is lawful. The Council will consider whether concessions in this regard are applied uniformly and whether the definition of 'family unit' as currently applied is appropriate. Further opinion is sought on this matter and including the number of children who should be included in any concessionary scheme for families.

Interactions between Categories

Concessions can apply to one or more categories (e.g. unemployed, asylum seekers, people over 60, disabled people, students and children / juvenile). Consultation indicates that the process whereby concessionary rates are made available must be applied systematically to avoid stigma or embarrassment and the criteria for obtaining such rates should be clarified and applied consistently across each facility or service. Staff administering the scheme (including desk staff) should be trained to ensure consistency and fairness.

5: Consideration of Measures to Mitigate any Adverse Impact.

(N.B. The following section to be considered and ratified by the Equality Scheme Steering Group and Chief Officers' Management Team prior to publication.)

The Council has given careful consideration to the measures that may be taken to mitigate any adverse impact which has been identified in the previous section of this report.

The Council will continue to ensure that its Pricing Policy strives to meet its stated aim of recouping a reasonable proportion of the Council's expenditure while acting in a fair and equitable manner towards both residents and visitors to Belfast.

With this in mind the Council will continue to harmonise and standardise its procedures in relation to pricing, and to operate a schedule of concessionary rates so as to make its facilities and services as widely accessible as possible within budgetary constraints. A great many of the Council's existing procedures are in accord with the Council's Section 75 obligations. However, prior to formal consultation the Council offers the following preliminary recommendations which it is felt may mitigate any adverse impact in relation to its Pricing Policy:

1. A consistent concessionary rate of admission and membership* will apply to the Council's leisure centres, outdoor leisure facilities and the Belfast Parks Golf Course. Furthermore the Council will ensure that similar rates of concession will apply to council-owned facilities governed by management agreements.

(*While an annual membership fee may effectively offer a discounted rate of admission for those with the means to pay either annually or by direct debit, it is maintained that this arrangement is justifiable as the discount encourages one-off annual payments which are of financial benefit to the Council and in turn its ratepayers.)

2. In the application of its charges for membership and admission to these facilities, in line with the stated policy aim a concessionary rate of 50 per cent of the full rate should apply for:
 - persons aged 60 years and above,
 - persons aged 4 -18 (DID WE NOT AGREE AGE 17 ie under 18?) years (juvenile),
 - students (in full-time education),
 - students (in part-time education but not in paid employment),
 - persons with a disability (those in receipt of disability-related state benefits),
 - persons “unemployed” or “not in employment” (consultees’ views on means of proof will be welcomed).
3. Children aged 3 and under would be admitted free of charge (however the Waterfront Hall policy in relation to admission of children under the age of 3 would still apply).
4. To ensure consistency, a standard form for completion (with adaptations available to accommodate the needs of affected groups) should be available at all facilities for those seeking concessionary rates. On satisfactory completion of the form, together with validation by an appropriate authority, a concession card including a photograph, will be made available to the person which will be valid for a set period of time (e.g. 12 months) and which can be used in all the Council’s facilities where concessionary rates apply.
5. A consistent concessionary rate for family units will apply to families of four, with at least one and a maximum of two adults. For families with more than two or three children then the standard concessionary rate (50 per cent of the full rate) will apply to any additional children aged 16 (OR IS IT 17?) years and under.
6. Charges for room hire in community centres will continue to endeavour to recoup 25 per cent of the gross cost to the council of running each centre. Off peak rates for hire of both community and leisure centre halls will be approximately 75% of the peak rate.
7. Existing charges for hire of the Ulster Hall/Group Theatre, Malone House, Belfast Castle and Belfast City Hall will continue to operate. Where concessionary rates may apply to groups using these facilities then eligibility will be as defined under 2. above and will operate at the discretion of management.. The rate charged for hire of the Ulster Hall in future should not differentiate between religious / non-religious events.

8. The concessionary rates as described in section 3 (page 11) to groups involved in Community Development Activity will continue to apply.
9. The concessionary rates currently operated by the Waterfront Hall will continue to apply (i.e. reductions offered on full ticket prices). However those eligible for these concessionary prices will now be as defined under 2. 3. and 5. above. Standby tickets, applicable for selected performances 15 minutes before commencement will be available to all members of the public.
10. Given that the charges for burial and cremation are already subsidised by the Council and its ratepayers, a differential rate will continue to operate between Belfast residents and others but the Council will strive to accommodate older people who may have lived in Belfast but have moved away from the City for residential or nursing care. To establish a set of guidelines for qualification it is suggested perhaps that those people aged 60 years or above who had previously lived in Belfast for more than 10 years and had lived outside Belfast for fewer than 5 years at the time of death would qualify for the Belfast residents' rate.
11. The definition of residence for burial and cremation should accommodate nomadic groups and asylum seekers who are living in Belfast.
12. The Council will continue to seek opinion during consultation as to whether the scale of charges for burial and cremation disproportionately affects members of particular religions where special arrangements may be required.
13. The Council will publicise the availability of concessionary rates in all its facilities to ensure wider uptake, and will also contact groups representing relevant equality dimensions.
14. The Council will apply a consistent policy of permitting significantly reduced rates for hire of facilities by groups representing persons with a disability where the use of the facility is linked to therapeutic measures.
15. In circumstances where a carer is accompanying a person who has a substantial disability and which would affect their ability to use the facility without the aid of a carer then the carer will be admitted without charge.
16. All relevant staff will be trained in the Council's policy in relation to the granting of concessionary rates in order to ensure sensitivity and consistency of approach.

17. The Council will endeavour to ensure that events/activities which are restricted to particular groups (e.g. women, men) will not only be scheduled exclusively at peak-rate times.
18. The Council will review its arrangements for the granting of private franchises within Council facilities to ensure that associated pricing schedules are fair and equitable in relation to the nine equality dimensions.
19. The Council will review its complaints procedure to ensure that a mechanism is introduced whereby complaints associated with pricing can be registered and monitored centrally.

6: Formal Consultation.

The Council wishes to consult as widely as possible on the findings included in this equality impact assessment together with the preliminary recommendations offered above. With this in mind the Council proposes to take the following actions:

- A press release will be prepared and submitted to various media outlets;
- Prominent advertisements inviting the public to comment on this matter will be placed in main newspapers in accordance with normal Council practice;
- This report will be issued to all of the consultees listed in the Council's Equality Scheme and to any member of the public on request;
- A copy of this report will be posted on the Council's website;
- Individual consultation meetings will be arranged with representatives of particular interest groups;
- Consultation meetings for the general public will be arranged at suitable, accessible venues in the city;
- Publicity material will be available at each of the Council's operational locations;
- The report will be made available, on request, in alternative formats including Braille, disk and audiocassette and in minority languages for those who are not fluent in English.

The arrangements for consultation are being co-coordinated by **XXX**, to whom all enquiries should be made.

The closing date for responses is XXXX

7: Publication

The outcomes of this EQIA will be published in the press and results will also be posted on the Council's website.