

Equality analysis of Covid-19 Secure: Guidance for Managing Playgrounds and Outdoor Gyms, in response to severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) in England

Introduction

This document records the analysis undertaken by the Ministry of Housing, Communities and Local Government on the Covid-19 Secure: Guidance for Managing Playgrounds and Outdoor Gyms. This guidance is advice and does not contain any legal requirements. The guidance provides the owners and operators responsible for playgrounds and outdoor gyms with practical advice on how playgrounds and outdoor gyms can be reopened and managed effectively to enable their use while minimising the transmission risk of COVID-19. This document provides a summary of the analysis of the potential impacts of the Covid-19 Secure: Guidance for Managing Playgrounds and outdoor gyms on groups with protected characteristics in accordance with the Public Sector Equality Duty (PSED) as set out in section 149 of the Equality Act 2010.

Government will keep this guidance and the need for this guidance under review. The guidance will only remain in place for as long as the level of risk is assessed to be sufficient to justify its impact and will be prepared to amend the guidance or policy to address any undue equalities impacts that arise, where appropriate.

The Covid-19 Secure: Guidance for Managing Playgrounds and Outdoor Gyms covers outdoor structures designed for children to play in or on, and the areas around these. They may include equipment such as slides, monkey bars, climbing frames, activity towers, swings, spring rockers, see saws and sandpits. An outdoor gym is defined as an outdoor space containing exercise fixtures and/or machines.

The guidance is intended for the owners and operators responsible for outdoor playgrounds. Outdoor gyms are covered by DCMS and have not been considered in this PSED. This includes, but is not limited to, local authorities, housing associations, private landowners, or businesses. The guidance does not pre-empt any forthcoming changes to this legislation. It is designed to provide the owners/operators of playgrounds and outdoor gyms with practical advice to help them prepare, so that when it is deemed safe for playgrounds and outdoor gyms to reopen (when regulations permit) they are able to do so in a way that is safe and minimises COVID-19 transmission risk. It suggests a number of possible solutions including implementing a regular cleaning regime of equipment and structures that have high traffic touch points, identifying an advisory limit on the number of users able to use a playground at any one time, communications and implementing a digital booking system.

Owners and operators responsible for playgrounds and outdoor gyms will have discretion over when they consider it safe to open for activity permitted by legislation, and may decide to remain closed should they feel they are not able to facilitate the safe usage of the playground or outdoor gym.

In the analysis below we flag that disabled persons and other groups may have additional needs. These call for a balanced approach to the implementation of this guidance by owners and operators responsible for playgrounds.

Analysis

We recognise there could be potential impacts on persons with one or more protected characteristics due to this guidance. We have considered this carefully. If there is any differential impact and the extent of this impact cannot be fully mitigated by measures we advise, we have identified it is our view that the public health reasons justify the approach. As 1 in 8 households in Britain do not have a garden, for many people playgrounds or outdoor gyms are their sole opportunity to exercise. This will be kept under review. Organisations championing the reopening of playgrounds outline the physical and mental benefit to children, particularly those without access to a garden and those from the most disadvantaged backgrounds.

Age

1. The purpose of the social distancing measures recommended in this guidance is to minimise the rate and ease of transmission of coronavirus for persons of all ages.
2. Users of playgrounds are younger children, whilst it may be difficult to ensure younger children adhere to social distancing measures the advice outlined in the guidance seeks to mitigate the impact of these .
3. The reduction of seating in playgrounds and surrounding areas to facilitate social distancing, suggested by the guidance, may cause issues for older age groups by removing areas where they may rest. We are aware that older age groups may use outdoor gym equipment or may accompany grandchildren to playgrounds. The Centre for Policy on Ageing (2016) found that in British people aged over the State Pension Age, 70% report issues with mobility¹. This is balanced against the fact that the reduction of street furniture or reduced amounts of seating due to social distancing marking may assist in decreasing the rate of infection.
4. The use of digital technology to access playgrounds to manage capacity may present problems for some groups who may not have access to the technology to view this information or take advantage of the opportunities it provides - this is particularly the case if the solution relies on the use of a smartphone / phone

¹ https://www.ageuk.org.uk/globalassets/age-uk/documents/reports-and-publications/reports-and-briefings/equality-and-human-rights/rb_may16_cpa_rapid_review_diversity_in-_older_age_disability.pdf