

KENT COUNTY COUNCIL
EQUALITY IMPACT ASSESSMENT

Directorate:

Growth, Environment & Transport (GET); Libraries Registration and Archives (LRA)

Name of policy, procedure, project or service

Proposed Kent Charitable Trust model of delivery for LRA services

What is being assessed?

The proposal to transfer LRA Services to a Charitable Trust

Responsible Owner/ Senior Officer

James Pearson
Service Improvement Programme Manager

Date of Initial Screening

December 14

Version	Author	Date	Comment
V1	James Pearson/Liz Taylor	December 15	Initial version which included consideration of ensuring public consultation was as accessible as possible
V2	James Pearson/Liz Taylor	May 15	Revised following consultation. References to how consultation accessible removed from screening grid and feedback from consultation included.

Screening Grid

Characteristic	Could this policy, procedure, project or service affect this group less favourably than others in Kent? YES/NO If yes how?	Assessment of potential impact HIGH/MEDIUM LOW/NONE UNKNOWN		Provide details: a) Is internal action required? If yes what? b) Is further assessment required? If yes, why?	Could this policy, procedure, project or service promote equal opportunities for this group? YES/NO - Explain how good practice can promote equal opportunities
		Positive	Negative		
Age		Low	Low	<p>Proposed new Model of Service Impact</p> <p>Customers in this characteristic group will continue to have equal access to services as now</p> <p>As detailed in the background material on the proposal at this stage it is not proposed to make changes to the service as a result of this proposal.</p> <p>The contract arrangement and service specification the Charitable Trust will have with KCC will ensure that customers of all ages are welcomed and served in the service points and that services continue to reflect the needs of all age groups.</p>	<p>Yes</p> <p>We will use this opportunity to promote all our services to communities across Kent. We will maintain existing services and investigate how they can be further improved for the future, as well as seeking ways to improve community participation within LRA services.</p>
				Proposed new model of service impact	

<p>Disability</p>		<p>Low</p>	<p>Low</p>	<p>Customers in this characteristic group will continue to have equal access to services as now</p> <p>The contract arrangement the Charitable Trust will have with KCC will ensure that customers of all disabilities are welcomed and served in the service points and that services continue to reflect the needs of all disabilities.</p> <p>Through the Charitable Trust we will ensure the Library Registration and Archive (LRA) continue to provide existing services targeted to disabled people, such as audio book postal loans/stocking of a wide range of audio books for blind and partially-sighted people.</p> <p>We will continue to ensure selections of large print and audio books available in all our libraries for people who are visually or print impaired and selections of accessible stock available for people with learning disabilities in main town centre libraries.</p> <p>Continue developing and supporting specialist book groups including VIP, MIND and Beyond Words groups.</p> <p>Continue acknowledging and celebrating diversity awareness and history celebrations.</p>	<p>Yes</p> <p>See above</p>
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				<p>Continue providing an exempt card for people with disabilities ensuring that they will face no barriers when accessing our services.</p> <p>The Charitable Trust will continue to maintain Induction loops available at service points</p> <p>It is proposed that the Charitable Trust will maintain the ICT contract for the first year ensuring that specialist accessibility software will continue to be available on our computers. The trust will need to ensure this is explicitly part of any specification should it market test these services.</p> <p>Any project to improve services or relocate must ensure all equality issues are taken into account at the planning stage.</p>	
Gender		Low	Low	<p>Proposed new model of service impact</p> <p>Customers in this characteristic group will continue to have equal access to services as now</p> <p>The contract arrangement the Charitable Trust will have with KCC will ensure that customers of both genders are welcomed and served in the service points and that services continue to reflect the needs of both genders.</p>	<p>Yes</p> <p>See above</p>

				<p>Through the Charitable Trust we will ensure LRA continue to provide existing services and we will ensure that the stock and services reflect the needs of both genders.</p> <p>The proposed Charitable Trust will provide services for all in the community which will be enforced by the contract with the Trust.</p>	
Gender identity	.	Low	Low	<p>Proposed new model of service impact</p> <p>Customers in this characteristic group will continue to have equal access to services as now</p> <p>The contract arrangement the Charitable Trust will have with KCC will ensure that customers of all gender identities are welcomed and served in the service points and that services continue to reflect the needs of transgender people.</p> <p>Through the proposed Charitable Trust we will ensure LRA continue to provide existing services and we will ensure that the stock and services reflect the needs of this protected characteristic.</p> <p>The proposed Charitable Trust will provide services for all in the community which will be enforced by the contract with the Trust.</p>	<p>Yes</p> <p>See above</p>

<p>Race</p>		<p>Low</p>	<p>Low</p>	<p>The contract arrangement the Charitable Trust will have with KCC will ensure that customers of all races are welcomed and served in the service points and that services continue to reflect the needs of the local communities.</p> <p>Through the Charitable Trust we will ensure LRA continue to provide existing services and we will ensure that the stock and services reflect the needs of this protected characteristic through stock the promotion of diversity history months.</p>	<p>Yes</p> <p>See above</p>
<p>Religion or belief</p>		<p>Low</p>	<p>Low</p>	<p>Proposed new model of service impact</p> <p>Customers in this characteristic group will continue to have equal access to services as now</p> <p>The contract arrangement the Charitable Trust will have with KCC will ensure that customers of all religions and beliefs are welcomed and served in the service points and that services continue to reflect the needs of the local communities.</p> <p>Through the proposed Charitable Trust we will ensure LRA continue to provide existing services and we will ensure that the stock and services reflect the needs of this</p>	<p>Yes</p> <p>See above</p>

				<p>protected characteristic.</p> <p>The proposed Charitable Trust will be setup to ensure that services continue to be as now - faith neutral and the library stock will continue to provide information covering all faiths and belief systems. This will also be covered in the staff training.</p>	
Sexual orientation		Low	Low	<p>Proposed new model of service impact</p> <p>Customers in this characteristic group will continue to have equal access to services as now.</p> <p>The Charitable Trust will be expected to have policies in place to comply with all equality and diversity legislation.</p> <p>It is proposed that the Charitable Trust will continue to provide services for all customers including books for the LGBT community and promotion of LGBT History Month and LGBT Book groups.</p>	<p>Yes</p> <p>See above</p>
Pregnancy and maternity		Low	Low	<p>Proposed new model of service impact</p> <p>Through the Charitable Trust we will ensure LRA continue to provide existing services and we will ensure that the stock and</p>	<p>Yes</p> <p>See above</p>

				<p>services reflect the needs of this protected characteristic.</p> <p>The Charitable Trust will continue to provide services for all customers ensuring customers will be welcomed in its service points including breastfeeding mothers</p> <p>Making the consultation material available online may have helped this group to more easily participate in the consultation.</p>	
Marriage and Civil Partnerships		Low	Low		<p>Yes</p> <p>See above</p>
Caring responsibilities		Low	Low		<p>Yes</p> <p>See above</p>

Part 1: INITIAL SCREENING

Proportionality - Based on the answers in the above screening grid what weighting would you ascribe to this function

Low	Medium	High
Low relevance or Insufficient information/evidence to make a judgement.	Medium relevance or Insufficient information/evidence to make a Judgement.	High relevance to equality, /likely to have adverse impact on protected groups

State rating & reasons

Low- The public should experience no change in how the service is delivered as a result of these proposed changes.

Background

In October 2013, the Library Registration and Archive Service (LRA) was identified as part of a group of services to be reviewed under the council's Facing the Challenge Programme, a whole council transformation programme designed to meet our financial challenges and set an ambitious vision for transforming the way KCC operates and delivers its services.

The review of the LRA Service has looked at potential alternative service delivery models and it was been agreed that KCC's preferred proposed model which will go out to public consultation will be a Charitable Trust.

Public consultation took place from 12th January and ran for twelve weeks concluding on 8th April 2015.

The consultation focused on:

- The proposed mission statement that KCC has for Libraries, Registration and Archive Services now and for the future.
- The proposal for the LRA service to be delivered by a Charitable Trust.

Options Considered

The other options included:

- to retain services in-house and accelerate the existing transformation programme
- to outsource service delivery
- to enter into a partnership or joint venture with a private or public sector partner

The key benefits of this model:

- The Trust model would offer some operational freedoms and flexibilities to the management of the service and allow the service to grow the business
- The trust would be able to respond more rapidly to market forces and changes to legislation
- The Trust model provides flexibility in terms of grant funding and identifying other sources of income which can be reinvested into the service.
- The establishment of a Kent Trust would promote and encourage community involvement in service design and delivery, in part through the Board of Trustees who would be selected from local people.
- The charitable nature of the Trust would align with KCC's commitment to maintain and improve these critical community services.
- The creation of a Charitable Trust as the vehicle to deliver the services would enable business rates relief, which would deliver savings year on year.
- The transfer to a Trust model would enable KCC to continue to fund a wide range of LRA services, including non-statutory but popular provision, into the future.
- Any parts of the service not eligible for charitable status could sit within a non-charitable trading arm of the Trust.

Information on the proposal

Customers should not see any changes to how they can use our Libraries, Registration and Archives services, should any of these proposals be implemented.

KCC will retain the statutory accountability for the service including compliance with the Equality Act 2010. KCC through the contract and the specification will make clear that the proposed trust through the delivery of its services will enable KCC to demonstrate that it is meeting its equalities duties. The delivery of these statutory duties and equality issues will be at the core of the way the charity delivers its services for KCC.

The Charitable Trust will be expected to have policies in place to comply with all equality and diversity legislation.

Any significant changes/ improvements to the services that a Trust might want to propose in future would need to observe KCC's equality duty as set out in the Equality Act 2010. This duty cannot be transferred and will remain with KCC.

It is proposed that if any reductions to KCC's minimum requirements as defined in the service specification could only be made following discussion,

and agreement in principle with KCC, followed by a public consultation and a decision by KCC. Requirements for future decision making will be written into any contract with KCC.

This proposal will ensure that

- KCC meets its statutory obligations in relation to all LRA Services including the Equality Act 2010.
- To ensure the key role LRA services play in local communities continues to be safeguarded and can be enhanced with local communities being meaningfully engaged. This in turn will lead to innovation and creative solutions.
- To deliver a sustainable service for KCC that will be customer focused, provide efficiencies and opportunities for growth in a rapidly changing environment and deliver the required savings as detailed in KCCs Medium Term Financial Plan

Through the commissioning arrangements and ongoing contract monitoring KCC would specify the service outcomes and minimum criteria it expected the Trust to deliver. KCC will retain accountability for its statutory obligations. There will be clear performance management targets within a clear performance management framework.

Delivery of libraries through a Trust model has been tried and tested by other councils and has delivered significant benefits. There are also examples of archives services delivered by Charitable Trusts. Learning from visits to other local authorities (e.g. Suffolk and York) has informed this proposal.

The Charitable Trust will need to have a whole range of procedures put in place including a recruitment procedure which will ensure that all staff and volunteers will be appointed through a recruitment process which will be subject to references and a Disclosure and Barring Service check (DBS)

All staff and volunteers will complete a training programme which will include equalities and diversity. All staff and volunteers will be line managed and subject to performance management.

The expected governance model for the proposed Charitable Trust also offers opportunity for representatives of the community to get involved. It is expected that the Charitable Trust will have a board of trustees who will be volunteers and have a range of skills and expertise and backgrounds.

Registration services

Under current UK law, registration services must be delivered via a Local Government approved scheme, and because of this, we are working with the statutory regulator to understand how Kent could deliver registration services under this new model and what the timeline for this outcome might be.

It is possible that moving registration services into a Charitable Trust may take longer than moving across library and archive services and we will have to take a phased approach to implementation with a move to a Library and Archive trust happening first.

Whatever option moves forward, it is KCCs intention that customers will still be able to access the same services in the same place as currently, irrespective of who is delivering them. This would mean for example that birth and death registrations would be delivered at the 28 library locations where they are currently.

Beneficiaries

Residents of Kent will benefit from the sustained continuation of Library, Registration and Archive services and by the opportunity to shape the development of these services in the future

Consultation and data

Due to the nature of the services provided LRA touch everyone's lives at some point, in particular through birth and death registration.

LRA services are accessed by a variety of means;

- 99 libraries
- Kent's historic archive collection at Kent History and Library Centre, Maidstone
- 11 mobile libraries
- six register offices
- home library service for housebound users and a postal audio book service to visually impaired customers
- information services, including access to resources in libraries and from home, and Ask a Kent Librarian: a business and general enquiry service
- online services: book computers and appointments; reserve and renew books; download e-books and audio books on home computers and mobile devices; plus WIFI in 35 libraries
- 654 computers with free internet access, scanning and printing facilities and accessible software including NVDA

Information about our customers

Kent County council area data- source www.kent.gov.uk/research

The 2013 mid-year population estimates show that Kent is the most populous county council area in the South East region with a population of 1,493,500 people

The 2011 Census indicates that 257,038 or 17.6% of Kent's residents have a health problem or disability that limits their day to day activities

Updated 12/05/2015 –post consultation

KCC/EqIA2012/

Libraries and Archives customers from our library management system

Active Borrowers by Gender

Gender	2013-2014	2014-2015
Female	63%	54%
Male	36%	31%
Left blank	1%	15%

Active Borrowers by Age

Age	2013-2014	2014-2015
0-10	24%	25%
11-19	13%	13%
20-29	6%	6%
30-39	10%	10%
40-49	12%	11%
50-59	8%	8%
60+	25%	25%
Age unknown	2%	2%

Active Borrowers by Disability

Disability	2013-2014	2014-2015
No	99.80%	99.77%
Yes	0.20%	0.23%

Active Borrowers by Ethnicity

Ethnicity	2013-2014	2014-2015
Not answered/declined to say	61%	62.6%
White British	34%	32.1%
Other Ethnic Origin	5%	5.2%

Borrowers Ethnicity Breakdown from the Library Management System 2014-2015	
Blank	84,655
E - White British (English, Welsh, Scottish, Northern Irish)	57,078
E- Not answered	26,747
E- Other Ethnic Group	3,201
E- White – Other	2,154

E- Asian/Asian British – Indian	882
E- Black/Black British – African	751
E- Asian/Asian British – Other	683
E- White – Irish	299
E- Asian/Asian British – Chinese	211
E- Declined to say	210
E- Black/Black British – Other	188
E- Mixed/Multiple – Other	182
E- Asian/Asian British – Bangladeshi	149
E- Black/Black British – Caribbean	127
E- Asian/Asian British – Pakistani	106
E- Mixed/Multiple – White and Asian	98
E- Mixed/Multiple – White and Black African	92
E- Mixed/Multiple – White and Black Caribbean	57
E - White - Gypsy or Irish Traveller	53
E- Arab	19
Grand Total	177,942

Registration

We do not have About You information on Registration customers as this data is collected by the Government and we do not have access to it.

Update following Consultation

Consultation summary

Proposed Kent Charitable Trust model of delivery for LRA services consultation

Promotion

To ensure that the consultation reached a wide range of people and to ensure everyone who wanted to had the opportunity and the means to contribute to the consultation we have promoted by:

- ✓ All libraries and registration offices having displays and documents to complete
- ✓ All mobile libraries having posters and documents to complete
- ✓ We held 6 Approved Premises Seminars to our licensed venues and encouraged them to comment
- ✓ Regular Twitter and Facebook coverage to encourage and promote
- ✓ The KCC website www.kent.gov.uk included a consultation page with all documentation, a main banner on the homepage and a digital countdown display of days left.
Number of downloads:
 - Consultation document (PDF) – 3763
 - Easy Read – 943
 - Options appraisal – 408
 - Consultation document (Word) – 609
 - Questionnaire (Word) – 612
 - Q&A –2052
 - Roadshow Timetable – 850
 - EqIA – 440
 - Inspires report – 286
- ✓ Sent a global 'MailChimp' email to customers (who give us permission to contact them) Email was successfully delivered to 3,411 people (out of 3,465 on the list) of these
 - 1,960 opened the email
 - 940 clicked a link in the emailSince the email went out on 6 March:
 - Pageviews for the consultation page spiked at 1,792 views on 6th (9 times the traffic the page had been getting during the week leading up to the emailer)
 - Pageviews for the consultation questionnaire also spiked at 147 views on 6th (8.2% conversion)
 - Of the 147 that went to the form, 51 submitted a response (35%)
- ✓ Held Roadshows across the 12 districts of the county on different days, times and locations. A total of 27 Roadshows held in shopping centres, town centres and libraries where we talked to **1,085** people with a further **664** approached but did not want to engage with the consultation..
- ✓ Targeted a wide variety of stakeholders and groups to ensure people were made aware and encouraged to contribute. Contacted by letters and emails including:

- Surgeries
 - Authorised persons and vicars
 - Hospitals hospices
 - Surgeries in Kent and Bexley Bexleyheath GPs
 - Hospitals and Hospices
 - Maternity Units
 - Funeral Directors
 - Individual Stakeholders
 - Districts identified and contacted their own partners and customers including people who are vulnerable and hard to reach and people with protected characteristics.
- ✓ Staff events – 3 Q+A roadshows across Kent and one of these sessions was filmed and made available to staff for those who could not attend.
- ✓ Replies sent to all customer- letters and emails
- ✓ We investigated ways in which people would have difficulty in engaging with the consultation because of print impairment or because of little or no literacy skills or English. We provided alternative formats of the consultation- online as well as a paper copy including an Easy Read version. Alternative formats requested and provided included:
- Large Print
 - Audio
 - Braille
- **2143** completed the consultation document **42** of these were the Easy Read version
- ✓ We wanted to make sure that vulnerable and hard to reach people and those with protected characteristics were included in the consultation. We included *About You* questions in the questionnaire so that we would capture the data about those who responded:

Age

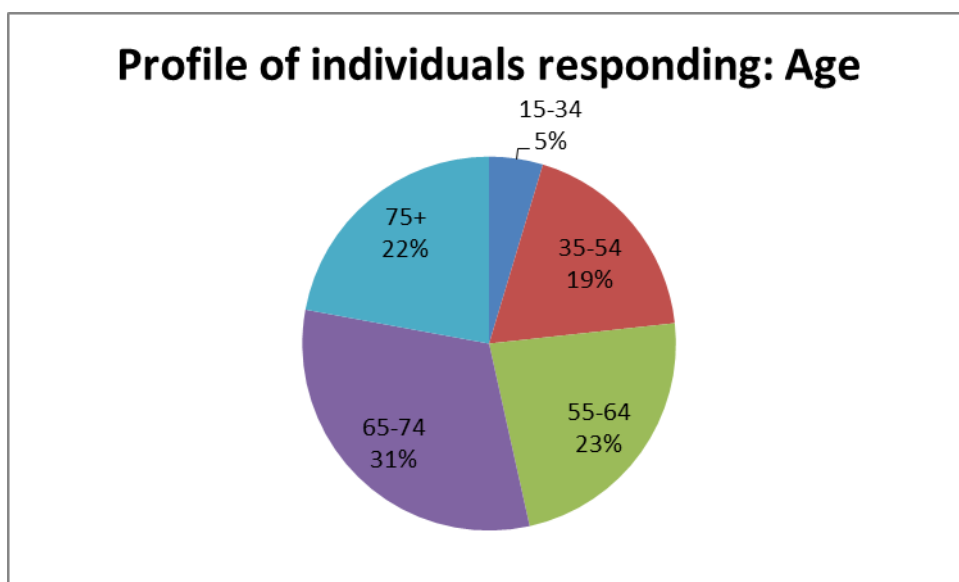
- Care was taken to ensure that the consultation process was communicated in a variety ways and platforms favoured by specific age groups. For example email, Twitter and Facebook as well as face to face at Roadshows. Paper and electronic versions of the consultation documents were also made available.

Method of completion	
Paper	67%
Online	33%

- For the older members of the community we ensured that the consultation posed no barriers by making sure that the sites of Roadshows were accessible with no physical barriers and that the format of the consultation documents were accessible by providing paper documents, large print and audio versions.
- Home Library Service Users received a large print flyer explaining the consultation through their Time2Give volunteer. Volunteers also had a supply of consultation documents and information on how to obtain alternative formats.
- The consultation was promoted through U3A, Age Concern, Older People Forums and Talk Times.
- Younger members of the community were made aware of the consultation, through Kent Youth Services and local youth centres, Kent Youth Forum and schools.

Profile of individuals responding Age:

Although we used a variety of platforms to promote the consultation to make it accessible and attractive to all age ranges the profile indicates that 76% taking part in the consultation were aged 55+



Age	Percentage of response
15-34	5%

35-54	19%
55-64	23%
65-74	31%
75+	22%

Disabilities

- We used existing contacts and partners in the districts to ensure that people with disabilities were included in the consultation. We requested that KAB promoted the consultation on their Talking Newspaper. We also informed Guide Dogs for the Blind and Hi Kent. Locally community development librarians engaged with their local disability/access groups.
- Postal loan service. To make sure our postal loan service users were made aware of the consultation approximately 800 large print flyers were included in the wallets posted out to our customers during the consultation period.

Alternative format provided at district level	District	Date
Large Print	Maidstone customer	13/02/2015
Audio	Gravesend Visually impaired reading group	06/02/2015
Large Print	Gravesend Visually impaired reading group	06/02/2015
Braille	Sevenoaks VIP group	23/02/2015
Large Print	Not known	12/03/2015

- At district level Community Development Librarians used the Easy Read version of the consultation document to engage with their District Partnership Groups, day centres and local Beyond Words Book Groups.
- Hospitals, hospices and doctors surgeries were contacted.

Profile of individuals responding: Disabilities

Disabled as set out in Equality Act 2010

	Individuals responding who consider themselves disabled	Active borrowers on Spydus who consider themselves disabled.
No	77%	99.80%
Yes	12%	0.20%
Prefer not to say / not answered	10%	

Profile of individuals with disabilities responding to the consultation represents a closer figure to the 2011 Census which indicates 17.6% of Kent's residents have a health problem or disability that limits their day to day activities, whilst 7.5% of the population in Kent are claiming a disability benefit.

Type of impairment of individuals responding who considered themselves disabled	
Physical impairment	49% (120)
Long standing illness or health condition	37% (92)
Sensory impairment	24% (59)
Mental health condition	12% (29)
Other	11% (27)
Learning disability	8% (20)
Prefer not to say / not answered	5% (13)

Gender

- As women carry a disproportionate share of childcare, access to the consultation process was seen to be a possible issue. Lone parents were also considered.
- To make the consultation easily accessible to both male and females an online version made available. Roadshows were offered throughout the day and at weekends to take into account work/childcare

commitments and the consultation was promoted at Children’s Centres and Baby Rhymetimes.

Profile of individuals responding: Gender

Profile of individuals responding is fairly close to the gender of active borrowers - the difference in the profiles could reflect number of people not answering the gender question on our library data- base.

	Gender of individuals responding	Gender of active borrowers
Female	57%	53%
Male	38%	31%
Prefer not to say / not answered	5%	16%

Gender Identity

- Email sent to notify TGPals of the consultation and inviting them to comment.

Sexual Orientation

- UKC LGBT group notified
- Rainbow Group KCC staff forum notified
- Rainbow Reads reading group Kent History Library Centre notified

Ethnicity

- Promoted at *Meet and Practice English Conversation* sessions and visiting ESOL groups held across the county.
- Promoted at local community groups for example to the Nepalese Elders at Cheriton Library.

Profile of individuals responding: Ethnicity
Showing comparison to ethnicity status on Spydus

Ethnicity %		
	Ethnicity of individuals responding %	Ethnicity status on Spydus %
White British	87	33.1

Prefer not to say	8	44.4
White Other	2	2
BME	2	2
White Irish	1	0.2
Black / Black British – Other	0.3	0.01
Asian / Asian British – Indian	0.3	0.05
Asian/ Asian British-Other	0.25	0.4
Mixed Other	0.25	0.09
Mixed White Asian	0.2	0.06
Mixed White & Black Caribbean	0.15	0.04
Black / Black British – Chinese	0.15	
Black / Black British – African	0.15	0.39
Asian / Asian British - Chinese	0.15	0.13
White Gypsy/Roma	0.05	0.03
Mixed White & Black African	0.05	0.06
Mixed Arab	0.05	
Asian / Asian British – Pakistani	0.05	0.05
Black / Black British – Caribbean	0.05	0.68

The profile of individuals taking part in the consultation evidences that we have engaged with a wide range of individuals from the majority of ethnic communities in Kent. More people have answered the ethnicity question in the consultation which is evidenced by the higher *White English* figure and the lower *prefer not to say*

Religion and beliefs

Representatives from all faiths and beliefs contacted through the *Authorised Persons* and *Vicars* spreadsheets – evidenced in the profile of individuals taking part in the consultation and declaring their religion and beliefs

Profile of individuals responding: Religion and Belief

Belong to a particular religion	
Yes	50%
No	36%
Prefer not to say / not answered	14%

Religious beliefs applies for those answering yes Compared to Kent 2011 Census		
	Religion of individuals who responded yes	Census 2011 Religion
Christian	94%	62.52
Buddhist	1%	0.46
Jewish	1%	0.12
Other	2%	0.42
Prefer not to say / not answered	2%	7.3
Muslim	0.3%	0.95
Hindu	0.3%	0.75

Pregnancy and maternity

- Consultation and Roadshows promoted through Doctor's surgeries
Children's Centres and Baby Rhyme-Times

Marriage and Civil partnerships

- Consultation material made available at all registration offices

Carers' responsibilities

- Young Carers and Carers groups made aware and invited their members to take part.
- Consultation documents available on-line
- HLS volunteers briefed to promote the consultation

When asked are you completing the questionnaire on behalf of?

Individual	92%
Group/organisation	6%
Left question blank	2%

Breakdown of responses

Individual	1,969
Group	136
Voluntary, community or faith sector	59
Public Sector Partner	40
Other	27
- Book Reading Groups	14 Book Groups
-Miscellaneous	13
Left question blank	8
Service provider	2
Business organisation	0

The full analysis of the consultation has been completed by Lake Market Research and this details the full analysis of the outcome of the consultation. In summary;

With regard to the mission statement, 52% of people strongly agreed or agreed with the proposed mission statement, 30% strongly disagreed or disagreed with 14% neither agreeing nor disagreeing.

- On the key question of the proposal to establish a charitable trust 38.6% strongly agreed or agreed with the proposal and the freedom and flexibilities that could be provided by a trust model. Of those individuals who did agree with the proposal 60% felt this was the best option of the alternatives to protect and expand services 13% said that it would provide access to additional funding, 9% that it made sense/a sensible suggestion and 9% responded saying that it offered flexibility and the freedom to move forward.
- 42.7% of respondents strongly disagreed or disagreed with the trust proposal with the key concerns being accountability and the future role of KCC; decision making regarding changes to the service including closures; future funding and set up costs; use of volunteers particularly in regard to professional staff; and the quality and future of the archive service.
- Respondents were also asked to suggest anything that they would like to see the service deliver that it does not currently. Of those who responded 21% wanted no additional service or wanted to guarantee the current high quality of services delivered. Other suggestions included having space for community activities, lectures, cafés, and other services and expanded IT. It is recommended that all options are considered in shaping the future direction of the service whether in-house transformation or in an external trust.
- A range of suggestions were put forward for how else we could deliver the savings for the LRA service. While 63% of consultees left this question blank of those who did respond 50% wanted the service to remain KCC run.

When asked views on the assumptions we have made in the EQIA we received the following feedback?

81%consultees left this question blank

Nothing/no comments	10%
Net: Positive	17%
- Agree with EqIA findings/ positive mentions	17%
Net : Negative	48%
- disagree with EqIA findings/ negative mentions	17%
- EqIA unnecessary/ waste of time/ waste of money	11%

- Not enough clarity/too much jargon/difficult to understand	5%
- Doesn't sufficiently address impact on Elderly/disabled vulnerable	5%
- More information/detail required	5%
- Doesn't sufficiently address impact on Library Staff	4%
- Concerns about accountability and KCC/lack of confidence in	3%
- Consultation process wasting money/flawed/negative mentions	3%
- Doesn't sufficiently address impact on the poor	2%
- Doesn't sufficiently address impact on rural residents	1%
Net: Not Accessed	26%
- Unable to access EqIA/website/no computer access/hard copy should be provided	24%
- Not read document	1%
- Not interested in this type of document	1%

Analysis of the feedback

Analysis of the feedback

The majority of the feedback from the consultation was from service users and one area for the service to explore going forward is the the need to engage a wider audience of non-service users.

As detailed in this report effort was taken to ensure that the consultation was promoted to as many people as possible and the actions identified in the initial EQUIA assessment to cover this were completed. It was hoped that more young people would have engaged in the consultation than has been achieved. The reasons for the low response should be reviewed for any future consultations, to see if any lessons can be learned.

The other feedback on the EQIA question in the consultation raises concerns about the impact on certain groups (Elderly, disabled, rural residents & poor) and while this is noted it is felt that many of these issues can be mitigated in the proposal as detailed in Appendix

Based on the work on the proposal to date any potential impact on protected characteristic groups can be mitigated There has not been any additional information as a result of the consultation to indicate a need to revise the findings of this assessment.

Updated 12/05/2015 –post consultation

KCC/EqIA2012/

Any impacts on staff would be addressed in a separate Assessment to be carried out should the decision be taken to implement a trust model.

There were concerns raised about not being able to access the Equality Impact Assessment, and these are also noted. The document was available from our website and could have been provided in hard-copy from any of our service points or on request. The availability of Equality Impact Assessments will be promoted more clearly in any future consultations.

Potential Impact

The proposal envisages no changes to the range of services customers currently receive.

Adverse Impact:

From the measures detailed in this report and in the action plan it is felt that any negative impacts can be mitigated

Positive Impact:

The consultation was an opportunity to promote Library Registration and Archive services to residents who do not currently use the library. In reality however the consultation was a difficult topic to engage those who do not use our services and the majority of returns being from current customers indicates that we did not reach those who do not use us at present. Going forward there is a real need for wider promotion and marketing of the service and engage in a far wider sense with the people of Kent.

JUDGEMENT

Option 1 – Screening Sufficient	No
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Justification:

Option 2 – Internal Action Required	YES
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Option 3 – Full Impact Assessment affect residents across Kent	Yes- this has potential to
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Equality and Diversity Team Comments

Sign Off

I have noted the content of the equality impact assessment and agree the actions to mitigate the adverse impact(s) that have been identified.

Senior Officer

Signed: James Pearson

Name:

Job Title: Service Improvement Programme Manager

Date:

DMT Member

Signed: Angela Slaven

Name:

Job Title: Head of Libraries Registration and Archives

Date:

**Equality Impact Assessment Action Plan
(To be completed)**

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Cost implications
All	To explore how communities can be more involved with the Charitable Trust e.g. by developing role of library as a community hub, safe place where all parts of the community can come together	To be explored if proposal for Charitable Trust progresses	Charitable Trust plays its role in eliminating discrimination, advancing equality of opportunity and develops a positive relationship with the people of Kent	TBC	TBC	
All	Proposed Charitable Trust needs to report on its equality outcomes and how it is making a difference to KCC	This requirement to be written into the contract of the proposed Charitable Trust if progresses Need to setup Charitable Trust so that it has the means to record and extract this information	Charitable Trust able to demonstrate how it is making positive outcomes	Project team	TBC	

Disability	Ensure accessibility software on computers is maintained	Ensure all contracts for computers explicitly states this as a requirement	Everyone able to make use of the computers	Project Team	TBC	
All	Ensure consultation reaches wide range of people	<p>Roadshow locations in 12 districts and on different days/times and locations</p> <p>About you questions included in the questionnaire so that capture data about those who respond</p> <p>Target wide variety of stakeholders and groups to ensure people aware and encouraged to contribute</p> <p>Investigate ways in which people</p>	Everyone who wants to contribute has the opportunity and the means to contribute to the consultation	Comms team	Completed	

		<p>who will have difficulty filling in the form can contribute</p>				
	Age	<p>Consultation online as well as paper copy and easy read version, translations available if requested</p> <p>Engage with HLS volunteers to consult with home library service users</p> <p>Engage with Youth County Council, Youth Services and Schools.</p>				
	Disabilities	<p>Use existing contacts and partners to ensure that people with disabilities are</p>				

		<p>engaged with and consulted through partners including KCC Level Playing Field staff forum, Kent Association for the Blind, Hi Kent, District Partnership Groups and local disability groups.</p> <p>Engage with TGPals support group to ensure we reach the transgender community</p> <p>District to identify and involve local faith groups in the consultation.</p> <p>District to identify any relevant LGBT in their districts</p>				
All	Governance arrangements pay due regard to	To be progressed via Governance arrangements if	All Equality act duties are covered	Project Team	TBC	

	Equality Act	proposed Charitable Trust develops				
All	Objects of Charitable trust may be able to identify opportunities to advance opportunities for particular protected characteristics	As above	Future Charitable trust is able to access funding opportunities related to protected characteristics identified in order to advance opportunities for groups which may be enjoyed by the wider community	Potential Charitable Trust	TBC	
All	Promotion of services and messages/updates about proposal whatever moves forward as result of decision process	Need to reach out to wider Kent audience, non-service users about service	Promotion and engagement plans needed	LRA SMT	TBC	
All	Promotion and marketing of service	Extend reach and awareness of services	Wider awareness and participation/use of LRA services	LRA SMT	TBC	

Appendix A -Response to the Consultation

Mitigation to concerns raised by the public about the proposed trust model

Concern	Proposed Mitigation
LRA service should continue to be run by KCC/local government	This is the option put forward in the consultation document and will be evaluated and considered by KCC before a decision is taken on the preferred option.
Services should remain free/will charge for certain services	The core library service will remain a free service as required by statute.
Uncertainty/closure for libraries in rural locations/small villages/concerns about closures	KCC was not consulting on any changes to the number of buildings
Will increase costs/become a money making exercise	The proposed trust will be looking at opportunities to generate the maximum income but the service will also have a clear specification to ensure it continues to deliver the level of service required.
Concerned service will have to be transferred back/trust losing funding	KCC will include appropriate termination provisions within the contract with the trust but there will also be performance management provisions to reduce the risks of any service failure. KCC will include all necessary contractual provisions to ensure that in the worst-case scenario the impact on the public of any transfer is minimised.
Loss of public accountability/FOI exempt/Councillors have no influence	The terms of the contract will ensure that the trust remains fully accountable to KCC and that Councillors will retain influence. By way of example, the trust will be contractually required to fully assist KCC in responding to any to Freedom of Information Act (FOI) requests
Will reduce/degrade services/remove services/negative impact	KCC will include appropriate levels of performance standards and a modern performance management framework in the contract documents.
Volunteers will lack necessary skills and training/may have difficulty recruiting	It is not proposed that there will be a change to the training or use of volunteers and it is not considered that there will be any difficulty in recruiting volunteers by virtue of a trust transfer.
Concerns about stock levels being maintained/range of books will reduce	If there is a transfer to a trust it is proposed that the book/stock fund is ring-fenced that can only be used for its proper purpose.

Limited opening times/reduced accessibility	See previous answers
Group activities may cease/loss of amenities/book clubs/reading groups	See previous answers. This is not proposed.
Will impact strongly on vulnerable groups e.g. the elderly/low income	See previous answers. There is no evidence or reason to believe that this would be the case and the EQIA analysis also does not suggest this as it is not proposed that there will be a reduction in the range of services which are required under the contract.
Mobile service cuts	See previous answers. It is not proposed to cut the mobile library service.
Concerns about Home Library Service	See previous answers. There are no proposals for any changes to the Home library service.
Concerns about preservation of archives/ease of access/Trust will not achieve archive accreditation	See previous answers. KCC will retain the ownership of its archives and the keeper of those that are deposited with the archives. KCC will require the trust to achieve archive accreditation which is the standard for the provision of archive services.
Concerns over professional expertise/librarians losing jobs/pensions	See previous answers. There is no proposal to reduce the level of professional expertise. Any transfer to a trust will be on the basis that the staff would transfer to work for the trust under the TUPE regulations and it is proposed that the trust would become a member of the Local Government Pension Scheme.