

KCC - Growth, Environment and Transport Directorate (GET).

Equality Analysis / Impact Assessment (EqIA) template

Name of decision, policy, procedure, project or service:

Review of the Libraries, Registration and Archives (LRA) fees and charges and proposals for changes to these to come into effect for the financial year 2018-2019

Brief description of policy, procedure, project or service

The fees and charges have not been fundamentally reviewed for a number of years. There have been some changes but due to other transformation and changes in the LRA service the opportunity for a full review has not been possible until now.

Each service within Libraries Registration Archives (LRA) has a range of fees which are either for income generation, statutory fee provision or a combination of both. Statutory fees are fixed and this review, whilst making reference to them, is unable to alter these. In Registration statutory fees are set by the General Register Office for specific services.

Libraries, Registration and Archives will continue to provide free core offers, which include for example:

- Book loans,
- PC use
- Wi-Fi access
- Archive access
- Ask a Kent Librarian service
- Wide range of digital resources including newspapers and e-books
- Activities including talk time, baby rhyme time and storytime, IT support
- Home library access/Touch a new World

This review covers fees and charges for things we already charge for or have in the past.

Date Document Updated 27/02/2018

Full details of the proposals can be found by reviewing the Growth, Economic Development and Communities Cabinet Committee Paper that accompanies this report.

Aims and Objectives

- To review all LRA fees and charges. The following approach was taken to this;
 - Collate existing fees and charges for the service
 - Compare and where possible, benchmark with other authorities
 - Report and recommend the approach to be taken against LRAs fees and charges
- To review the offers that accompany the fees to see if there is an opportunity to either simplify our charges or improve the offer we are providing for customers.
- Look at how we communicate our fees and charges with the aim that they are clear and easy to understand by both staff and customers

JUDGEMENT

Set out below the implications you have found from your assessment for the relevant Protected Groups. If any negative impacts can be justified please clearly explain why.

- **Adjust and continue** - adjust to remove barriers or better promote equality- see Action plan at the end

I have found the Adverse Equality Impact Rating to be Low

GET Document Control

Revision History

Version	Date	Authors	Comment
V0.1	09/02/18	Aisha Affejee	
V0.2	14/2/18	Aisha Affejee	
V0.3	16/2/18	Aisha Affejee/James Pearson/Barbara Bragg	
V0.4	22/2/18	Akua Aguepong	
V0.5	23/2/18	Aisha Affejee & Barbara Bragg	
V1 (this should be assigned to the version the Director signs off)	26/02/2018	Aisha Affejee/James Pearson/Barbara Bragg	

Document Sign-Off (this must be both the relevant Head of Service and the relevant Director)

Attestation

I have read and paid due regard to the Equality Analysis/Impact Assessment. I agree with the actions to mitigate any adverse impact(s) that has /have been identified.

Name	Signature	Title	Date of Issue
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Date Document Updated 27/02/2018

James Pearson		Head of Service	
		Director	

Date Document Updated 27/02/2018

Part 1 – Screening (further information included in the Action Plan)

Regarding the decision, policy, procedure, project or service under consideration,

Could this policy, procedure, project or service, or any proposed changes to it, affect any Protected Group (listed below) less favourably (negatively) than others in Kent?

Could this policy, procedure, project or service promote equal opportunities for this group?

Please note that there is no justification for direct discrimination; and indirect discrimination will need to be justified according to the legal requirements

Protected Group	You <i>MUST</i> provide a brief commentary as to your findings, or this EqlA will be returned to you unsigned			High/Medium/Low Favourable Impact
	High Negative Impact	Medium Negative Impact	Low Negative Impact	
Age			People over 60yrs paying higher overdue charges - many people over 60 years are retired, often resulting in lower incomes. LRA will focus alongside any increases in charges on promoting how easy it is to renew books via phone, in one of our buildings or on the web to ensure	Children and young people continue to pay no fines or reservation fees until they are 18 yrs old Standardising the fees & charges which will make it easier to understand for all ages Clearer information for

			<p>no barriers to borrowing created.</p> <p>Some older people have little or no experience with digital resources. By offering charges on hard copy reminder letters, it could be viewed older people are being penalised for this lack of knowledge but LRA will focus on promoting ways to avoid overdues in the first place and also highlight that LRA can assist with access to digital and has IT buddies who can support people for example in setting up an email account</p> <p>Change in law requiring all young people to be in a form of education until they are 18yrs old. This</p>	<p>staff to ensure that those who qualify for different age categories (0-4yrs, 5-17yrs, Adult, Over 60) know what it entitles them to</p>
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			<p>means that young people born in the September are disadvantaged compared to their peers in their year group born in the following August, as the former will not receive the same offer although they are in the same year at school / college / apprenticeship. This is a wider issue than fees and charges so will be looked at by LRA in conjunction with our work to review our offers.</p> <p>Upper limit of fines reduced to £5, Once this limit was reached customers would be unable to access the computers, Wi-Fi or take out library stock – However this is also preventing people building up in effect a</p>	
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			<p>debt on their ticket, encouraging prompt payment. It is also clear what services incur a charge and we will also review our promotion of the new fees and charges. We also propose to have a 3 month period before the limit comes into effect allowing customers the chance to bring their accounts in line with the £5 limit.</p> <p>Increased charges for ILL (Inter Library Loans) outside of SELMS (South East Library Management Authorities)- could become a barrier for people trying to access wider material including students for their studies. Kent does have a wide access to stock both in Kent and across the SELMS authorities.</p>	
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			The charges also reflects what Kent is charged by the body loaning us the material.	
Disability			Upper limit of fines reduced to £5, Once this limit was reached customers would be unable to access the computers, Wi-Fi or take out library stock – However this is also preventing people building up in effect a debt on their ticket, encouraging prompt payment. It is also clear what services incur a charge and we will also review our promotion of the new fees and charges. We also propose to have a 3 month period before the limit comes into effect allowing customers the chance	Standardising the fees & charges makes it easier to understand for people with learning and print disabilities Clearer information for staff to ensure that those who qualify for an Exempt card and know what it entitles them to. Communication with our staff and customers about the changes will be a variety of formats, ensuring that all are able to access the information: Face to face with our

			<p>to bring their accounts in line with the £5 limit.</p> <p>People with disabilities and long term illnesses may find themselves in the lower income bracket due to not being able to work full time or at all. LRA will focus on promoting how easy it is to renew books via phone, in one of our buildings or on the web to ensure no barriers to borrowing created.</p>	<p>staff, Hard copy posters displayed around the libraries at prominent points, On our website & via our social media pages, which will be accessible when using our free computers and accessibility software Offer of alternative formats will be included in all of our communications of the changes</p>
Gender	N/A	N/A	N/A	N/A
Gender identity/ Transgender	N/A	N/A	N/A	N/A
Race			Upper limit of fines reduced to £5, Once this limit was reached customers would be unable to access the	Unpaid charges reduce to £5, preventing customers with this amount on their card to access

			<p>computers, Wi-Fi or take out library stock – However this is also preventing people building up in effect a debt on their ticket, encouraging prompt payment. It is also clear what services incur a charge and we will also review our promotion of the new fees and charges. People from different cultural backgrounds may find themselves in the lower income bracket for a variety of reasons, such as some only having basic English. LRA will focus on promoting how easy it is to renew books via phone, in one of our buildings or on the web to ensure no barriers to borrowing created. We also propose to have a 3 month period before the limit comes into</p>	<p>the computers, wi-fi or library stock - this would help support people to pay off charges earlier and not building large amounts on their accounts</p> <p>Communication with our staff and customers about the changes will be a variety of formats, ensuring that all are able to access the information: Face to face with our staff, Hard copy posters displayed around the libraries at prominent points, Offer of alternative formats will be included in all of our communications of the changes On our website & via our social media pages,</p>
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			<p>effect allowing customers the chance to bring their accounts in line with the £5 limit.</p> <p>Increased charges for ILL(Inter Library Loans) outside of SELMS (South East Library Management Authorities)- could become a barrier for people trying to access wider material including in different languages, In mitigation Kent does have community language stock and access to this across the SELMS authorities. Our charges also reflect the charges Kent gets from the body loaning the material to us.</p> <p>Demand for specific languages are monitored by stock team and collection</p>	
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			adjusted according to need so that Kent always maintains a collection for customers to take out.	
Religion and Belief	N/A	N/A	Cease 'Naming/ Welcoming' ceremonies due to constant low take up - This does reduce potential options for 'welcoming' ceremonies for people outside of religious ceremony but despite marketing there is no demand for this offer based on take-up last year. .	N/A
Sexual Orientation	N/A	N/A	N/A	N/A
Pregnancy and Maternity			Cease 'Naming/ Welcoming' ceremonies due to constant low take up - This does reduce potential options for 'welcoming' ceremonies for people outside of religious	

			ceremony but despite marketing there is no demand for this offer based on take-up last year. .	
Marriage and Civil Partnerships			<p>Increases in Ceremony fees could present a concern across the protected characteristic groups. In mitigation there are options to suit what people want to pay across the range of ceremony options including the statutory fee of £46 which is not changing and then the fee bands proposed offer customer choice based on size of room/number of guests that looking at.</p> <p>Increase in licensing may deter venues for applying for a license, potentially reducing the number of venues available in the county</p>	

			but this is felt unlikely due to the fact that ceremonies are a good income potential for many businesses and the licences are for 3 years and Kent does offer that any ceremonies booked will be covered representing a very good offer to the venues.	
Carer's Responsibilities				Clearer information for staff to ensure that those who qualify for this card are able to have it and know what the concessions it holds

Part 2 - Full Equality Analysis /Impact Assessment

Information and Data used to carry out your assessment

- For libraries a yearly report is published by CIPFA called “Fines and Charges in Public Libraries in England and Wales” The report for 2017 has been used in completing this review. Where possible, we have also pulled borrower data against each of the protected characteristics to help inform our assessment.
- For Registration the charges, outside of statutory fees are set by individual authorities. Kent is a member of the South-Eastern Registration Board (SERB) who periodically collate and circulate their fees. This gave us access to compare the fees of authorities with a similar profile to Kent, namely Hampshire, Buckinghamshire, Oxfordshire, East Sussex, West Sussex.

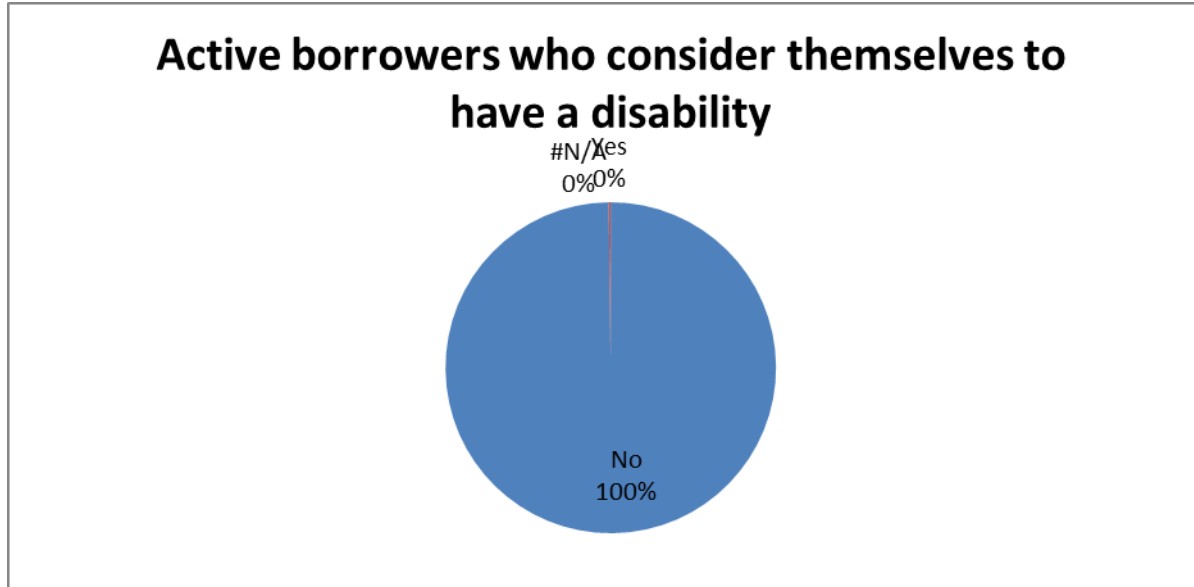
Who have you involved consulted and engaged with?

We have worked on revisions to our fees and charges within LRA and used the sources covered above to benchmark our fees and charges against other authorities.

Analysis

We have fees and charges in place currently so these already impact on all protected characteristic groups. For registration services this could have impact on a much wider scale but only those who are looking to take up any of these service offers in the future. Looking at the data we have on impact for libraries we have looked at the proportions of our customers that fit into the different protected characteristic groups as recorded on our Library Management system Spydus. This tells us the following;

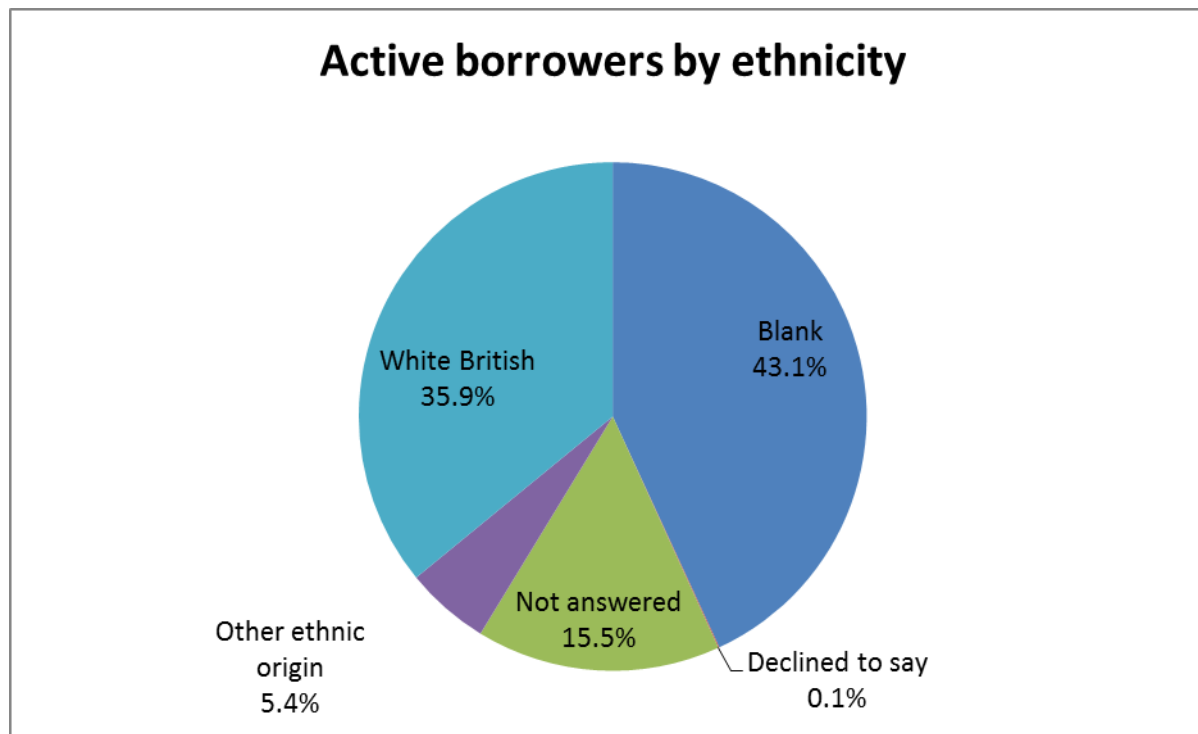
Disability



Count of Borrower ID	Total	Percentage
Disability - General		
No	65,408	99.81%
Yes	120	0.18%
#N/A	6	
Grand Total	65,534	

Date Document Updated 27/02/2018

Ethnicity

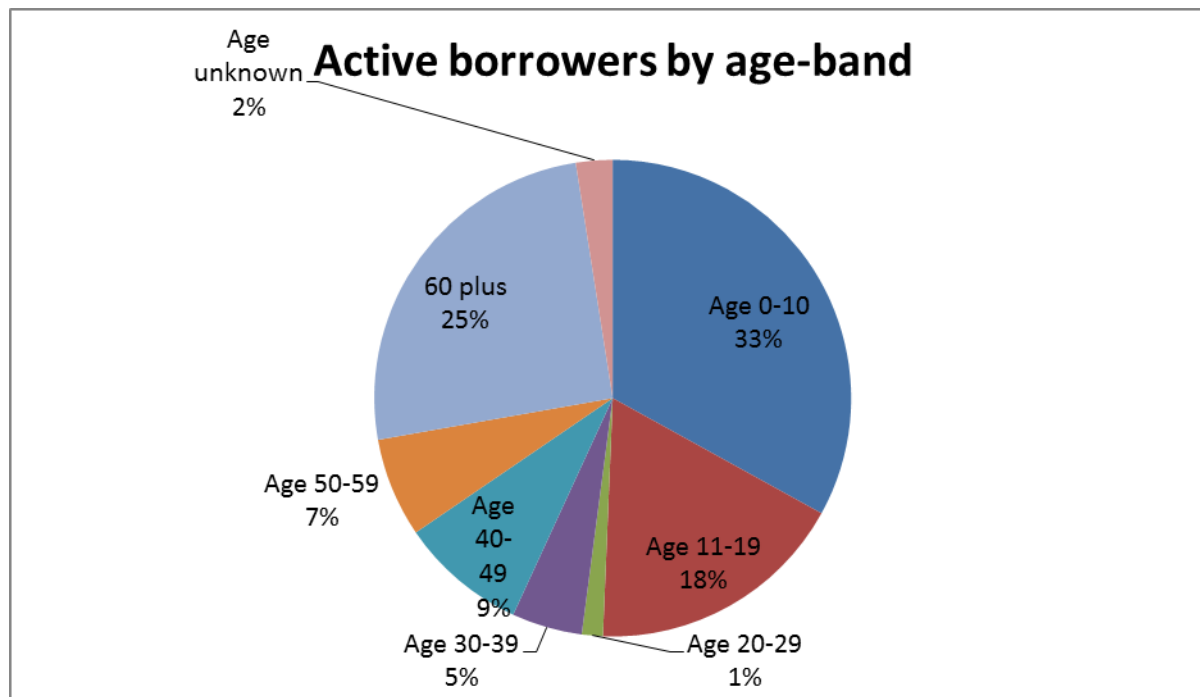


Count of Borrower ID	
Ethnicity - General	Total
Blank	28,250
Declined to say	43
Not answered	10,189
Other ethnic origin	3,516
White British	23,536

Date Document Updated 27/02/2018

Grand Total	65,534
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Age



Count of Borrower ID	
Age Band	Total
Age 0-10	21,640
Age 11-19	11,559
Age 20-29	932
Age 30-39	3,134

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Age 40-49	5,641
Age 50-59	4,411
60 plus	16,587
Age unknown	1,630
Grand Total	65,534

Adverse Impact,

The revisions to the LRA Fees and Charges affect all users including the protected characteristic groups. The areas highlighted where this may have additional impact on the protected characteristic groups are;

Age:

- People over 60yrs paying higher overdue charges - many people over 60 years are retired, often resulting in lower incomes. LRA will focus alongside any increases in charges on promoting how easy it is to renew books via phone, in one of our buildings or on the web to ensure no barriers to borrowing created.
- Some older people have little or no experience with digital resources. By offering charges on hard copy reminder letters, it could be viewed older people are being penalised for this lack of knowledge but LRA will focus on promoting ways to avoid overdues in the first place and also highlight that LRA can assist with access to digital and has IT buddies who can support people for example in setting up an email account
- Change in law requiring all young people to be in a form of education until they are 18yrs old. This means that young people born in the September are disadvantaged compared to their peers in their year group born in the following August, as the former will not receive the same offer although they are in the same year at school / college / apprenticeship. This is a wider issue than fees and charges so will be looked at by LRA in conjunction with our work to review our offers.
- Upper limit of fines reduced to £5, Once this limit was reached customers would be unable to access the computers, Wi-Fi or take out library stock – However this is also preventing people building up in effect a debt on their ticket, encouraging prompt payment. It is also clear what services incur a charge and we will also review our promotion of the new fees and charges.

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We also propose to have a 3 month period before the limit comes into effect allowing customers the chance to bring their accounts in line with the £5 limit.

- Increased charges for ILL(Inter Library Loans) outside of SELMS (South East Library Management Authorities)- could become a barrier for people trying to access wider material including students for their studies. Kent does have a wide access to stock both in Kent and across the SELMS authorities. The charges also reflect what Kent is charged by the body loaning us the material.

Disability

- Upper limit of fines reduced to £5, once this limit was reached customers would be unable to access the computers, Wi-Fi or take out library stock – However this is also preventing people building up in effect a debt on their ticket, encouraging prompt payment. It is also clear what services incur a charge and we will also review our promotion of the new fees and charges. We also propose to have a 3 month period before the limit comes into effect allowing customers the chance to bring their accounts in line with the £5 limit.
- People with disabilities and long term illnesses may find themselves in the lower income bracket due to not being able to work full time or at all. LRA will focus on promoting how easy it is to renew books via phone, in one of our buildings or on the web to ensure no barriers to borrowing created.

Race

- Upper limit of fines reduced to £5, once this limit was reached customers would be unable to access the computers, Wi-Fi or take out library stock – However this is also preventing people building up in effect a debt on their ticket, encouraging prompt payment. It is also clear what services incur a charge and we will also review our promotion of the new fees and charges. People from different cultural backgrounds may find themselves in the lower income bracket for a variety of reasons, such as some only having basic English. LRA will focus on promoting how easy it is to renew books via phone, in one of our buildings or on the web to ensure no barriers to borrowing created. We also propose to have a 3 month period before the limit comes into effect allowing customers the chance to bring their accounts in line with the £5 limit.

- Increased charges for ILL outside of SELMS (South East Library Management Authorities)- could become a barrier for people trying to access wider material including in different languages, In mitigation Kent does have community language stock and access to this across the SELMS authorities. Our charges also reflect the charges Kent gets from the body loaning the material to us. Demand for specific languages are monitored by stock team and collection adjusted according to need so that Kent always maintains a collection for customers to take out.

Pregnancy and Maternity

- Cease 'Naming/ Welcoming' ceremonies due to constant low take up - This does reduce options for 'welcoming' ceremonies for people outside of religious ceremony but despite marketing there is no demand for this offer based on take-up last

Positive Impact:

Age

- Children and young people continue to pay no fines or reservation fees until they are 18 yrs old
- Standardising the fees & charges which will make it easier to understand for all ages
- Clearer information for staff to ensure that those who qualify for different age categories (0-4yrs, 5-17yrs, Adult, Over 60) know what it entitles them to

Disability

- Standardising the fees & charges makes it easier to understand for people with learning and print disabilities
- Clearer information for staff to ensure that those who qualify for an Exempt card and know what it entitles them to.

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Race

- Unpaid charges reduce to £5, preventing customers with this amount on their card to access the computers, Wi-Fi or library stock - this would help support people to pay off charges earlier and not building large amounts on their accounts. We also propose to have a 3 month period before the limit comes into effect allowing customers the chance to bring their accounts in line with the £5 limit.

Carer's responsibilities

Clearer information for staff to ensure that those who qualify for this card are able to have it and know what the concessions it holds

General to all characteristics

We will as part of this work review all the current exemptions and concessions to make this simpler.

If any customer does have an issue around the fees and charges for them personally then they can always raise this locally so that individual circumstances will always be considered.

JUDGEMENT

LRA should review its fees and charges appropriately taking account of the impact this will have. Based on the existing concessions plus the actions put in the actions plan it is our judgement that the Fees and Charges can progress and that we;

- **Adjust and continue** - adjust to remove barriers or better promote equality- see Action plan

Please see action plan below. LRA will going forward review its fees and charges on an annual basis and this EQIA.

Part 3 - Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Resource implications
All	Users not being aware of our new fees and charges	Promotional material to be devised also promotion of the many ways that can be used to avoid library overdue charges in particular.	Users aware of the changes	Barbara Bragg	Users to be notified before new fees and charges come into effect	Staff to devise material and cost to produce.
All	Communicating the changes to our customers and staff	<p>We will use a variety of formats, ensuring that all are able to access the information:</p> <ul style="list-style-type: none"> • Emails to our staff • ASM to raise at staff briefing, ensuring all staff not attending to be aware of changes • Staff to mention to customers when serving, 	Staff and customers to be aware of the changes to the fees and charges, and understand what this means for them	Barbara Bragg	<p>Users to be notified before new fees and charges come into effect</p> <p>Ongoing during the period of change</p>	Staff to devise material and cost to produce.

		<p>having face to face conversations with our customers</p> <ul style="list-style-type: none"> • Hard copy posters displayed around the libraries at prominent points, • Offer of alternative formats will be included in all of our communications regarding the changes • On our website & via our social media pages, 				
Age	<p>Older people:</p> <ul style="list-style-type: none"> • not so many use online resources email • Older people 	<p>Computer Buddies available in most libraries to assist those to get online and develop their computer skills</p>	<p>Give customers confidence and support to be able to access information and services digitally, eventually</p>	Districts	<p>Already in place- ongoing</p>	<p>Staff proactive promoting the computer buddy sessions to people with limited/no digital skills</p>

	<p>over 60yrs may find the higher fines a barrier and put them off borrowing items</p>	<p>Touch a New World scheme available to those who may find leaving the house a barrier due to a disability, health issue or due to caring responsibilities</p> <p>Clearer guidance for staff about different Offers, exemptions and concessions for each category.</p> <p>Promotional material to emphasise the way to avoid paying overdue fines.</p>	<p>allowing them to choose e-reminders with no charges and allow them to renew online</p> <p>This will give staff more confidence and enable them to be proactive in ensuring customers have the correct library card category</p>			<p>Potentially may need more volunteers to supply this service</p>
Disability	<p>Upper limit of fines reduced to £5, People with disabilities and long term</p>	<p>Where possible, offering payment options – local decision</p>	<p>With payment options, customers will aim to pay off any fees,</p>	<p>Districts</p>	<p>Already in place – ongoing</p>	<p>Staff proactive promoting the computer buddy sessions to people with</p>

	<p>illnesses may find themselves in the lower income bracket due to not being able to work full time or at all. This could cause a barrier to accessing library services</p>	<p>Computer Buddies available to assist those to get online and develop their computer skills, to be able to access library online services, information and opportunities e.g. renewing books online</p> <p>Offer training to Computer Buddies to learn more about the accessibility options on the library public computers so would be able to assist somebody with a disability access it and learn to use it</p>	<p>allowing them to continue using Libraries services</p> <p>Give customers confidence and support to be able to access information and services digitally, eventually allowing them to choose e-reminders with no charges and allow them to renew online</p> <p>Computer Buddies will be able to offer help for customers with disabilities will be able to access more information about the library and its services online, allowing customers to increase</p>	<p>Service Innovation Team – BDOs & The Information Team</p>	<p>Training to be produced – 2018</p>	<p>limited/no digital skills</p> <p>Potentially may need more volunteers to support people with disabilities online</p> <p>Staff time to produce the training resource & for those to complete it</p>
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			confidence and ability to manage their library accounts			
		Staff and volunteers to be made aware of the accessibility options on our e-resources such as our eBooks, eMagazines, eAudiobooks & eNewspapers.	This will help allow customers with disabilities to access more services and opportunities at times that suit them. There are no fines or charges involved with e-stock so customers could still access the library services without fear they will incur fines due to not being able to return items to their local library	Service Innovation Team – BDOs & The Information Team	Training to be produced - 2018	
		Clearer guidance for staff about different Offers, exemptions and	This will give staff more confidence and enable them to be proactive in	BDO	April 2018	

		<p>concessions for each category</p> <p>Staff being proactive, ensuring people who are eligible for Exempt card or HLS are offered this option</p>	<p>ensuring customers have the correct library card category</p> <p>Customers will be able to access the service and Offer that is best for their situation</p>	Local District Teams	Ongoing	
Race	<p>Upper limit of fines reduced to £5,. People from different cultural backgrounds may find themselves in the lower income bracket for a variety of reasons, such as some only having basic English, and find this causes a barrier to access the services</p> <p>Increased charges for ILL outside of SELMS</p>	Where possible, offering payment options – local decision	<p>With payment options, customers will aim to pay off any fees, allowing them to continue using Libraries services</p> <p>Where there is an identified demand, community language stock will be hired / purchased, minimising the requirement for ILL.</p>	District	Already taking place - ongoing	

	- could become a barrier for people trying to access different language stock not held within Kent Libraries accessing stock in alternative languages	Community language stock has been moved from a central location to district hubs, making the collection more visible and accessible for customers	Customers with need of community language stock are able to search the catalogue and access it easily			
Pregnancy & Maternity	Cease Naming/ Welcoming ceremonies due to constant low take up - reduce options for 'welcoming'	Options exist for civil 'welcoming' ceremonies performed by agencies outside of KCC	Customers who wish for this can still access this option outside of KCC	N/A		

	babies for people outside of a religion					
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Have the actions been included in your business/ service plan? Not yet but subject to the proposal being approved LRA will develop an action plan to implement the revised fees and charges covering the additional actions covered above.

