

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

### **Equality Analysis / Impact Assessment (EqIA) template**

#### **Name of decision, policy, procedure, project or service: Proposed library tiering proposal and opening hour review**

##### **Brief description of policy, procedure, project or service**

The Libraries, Registration and Archives service are currently developing the strategy for the future direction of LRA services over the next three years. As part of this work we are looking to improve our efficiency of service delivery, focus our resources and standardise our offer. One of the ways we are proposing to do this is through using an evidence-based library tiering model and opening hour review.

##### **Context**

Kent, like all locations, has seen continued change in recent times; from an ever-increasing population to growth in the use of the internet, social media, and increased mobility. The Kent of today is evolving and how people want to access services is changing. This is all in the political context where the money for local government is decreasing and demand for services like Adult Social Care is increasing. Libraries, Registration and Archives, like all local public services, needs to evolve and ensure that it focuses on the best outcomes possible for Kent residents. In order to achieve this, a new direction for the service is required in order to remain innovative and sustainable for the future.

KCC is committed to keeping all 99 libraries open. Our data and evidence and feedback from staff highlights that not all of our opening times are well utilised however. We have not reviewed the opening hours across all libraries for many years and opening when we are not well used is not good use of taxpayer's money.

##### **Aims and Objectives**

Instead of just reducing opening hours we propose a data and evidence led approach, to review and arrange all 99 Libraries in to 5 tiers. The tiering model is a way of grouping libraries that have a similar level of performance. Each tier would have a consistent level of opening hours applied, and the tier would also influence the number of staff, the breadth of stock and the range of events

and activities offered. This would ensure we were focussing our resources optimally, with then the pattern of opening hours tailored to the local community's needs. It would also help us market the Libraries better by making it easier to communicate the offer customers would receive, similar to the approach some supermarkets have taken.

We used data from the calendar year 2017 to devise the model, and the specific data used is as follows:

	Criteria	Why have we used this data?
<b>Usage</b>	<b>Visits per hour</b>	<p>Visits are a key measure of library use as they record everyone who comes into the library not just those who have borrowed an item or used a public computer.</p> <p>We have used 'per hour' as this is a fair way of evaluating all our libraries regardless of how many hours they are open.</p>
	<b>Loans per hour</b>	<p>It is important that we recognise our core role of providing access to books, DVDs, audio books etc.</p> <p>Again, we have used 'per hour' as this is a fair way of evaluating all our libraries regardless of how many hours they are open.</p>
	<b>% unique users</b>	<p>There are some libraries where a lot of customers use only that library and others where people use more than one library. This covers the number of users who only use one library.</p>
	<b>% public computer use</b>	<p>IT (Information Technology) use is an important part of the modern service and wanted to ensure this was taken into account.</p>
	<b>% of customers who attend</b>	<p>Events &amp; activities are another important part of the modern library service and reflect</p>

	<b>events</b>	our role in combating social isolation.
	<b>Building size</b>	The size of library building will to some extent determine the level of stock and facilities that can be made available and the type and number activities and events that can take place.

This data provides effective criteria to evaluate the use of our libraries that recognises the full range of use of the modern library service. As the performance of our 99 libraries, our mobiles, outreach and online services tells us we are providing comprehensive coverage across Kent, we have decided not to incorporate 'need' criteria (for example, deprivation) at this stage.

### The proposed 5 tiers are below

Five Proposed Tiers of Kent Libraries					
	Town Plus	Town	Community Plus	Community	Small Community
Library location	Centrally located in large highly populated towns	Centrally located in large highly populated towns or villages	Conveniently located in small towns, villages and suburban communities	Conveniently located in villages and suburban communities	Conveniently located in smaller villages and suburban communities
Library Building	Large building often co-located with partner services	Large and medium buildings some co-located with partner services	Medium and small buildings some co-located with partner services	Small buildings some co-located with partner services	Small buildings some co-located in community and village centres.
Weekly staffed opening hours	<b>42</b>	<b>37</b>	<b>28</b>	<b>23</b>	<b>15</b>
Stock	Large comprehensive	Good	Range of adult and	Range of adult	Core stock of adult and

available	range of adult and children's fiction and non-fiction books and DVD's for loan. Local history collection	range of adult and children's fiction and non-fiction books and DVD's for loan. Local history collection	children's fiction and non-fiction books for loan, chosen and developed to reflect local need and preferences. Some local history stock	and children's fiction and non-fiction books for loan, chosen and developed to reflect local need and preferences. Some local history stock.	children's fiction and non-fiction books for loan, chosen and developed to reflect local need and preferences.
Access to public PCs and Wi - Fi	✓	✓	✓	✓	✓
Library information and e-resources	✓	✓	✓	✓	✓
Summer Reading Challenge	✓	✓	✓	✓	✓
Community activities, Rhyme Time, Talk Time	✓	✓	✓ subject to volunteer availability	✓ subject to volunteer availability and space	✓ subject to volunteer availability and space

Which libraries are in each tier are detailed in the public consultation document. If implemented as proposed the model would see a reduction on average across the county of 20%. This equates to estimated revenue saving to KCC of up to £1million achieved by a reduction in the number of staff employed in the service.

The public consultation on this model is focussed on the criteria we have used. The actual arrangement locally of the hours by Library would be looked at subject to a decision to move ahead with the tiering model. It is proposed subject to decision that there is localised engagement on this to shape the hours to local need within the parameter that the total number of hours open has been set and we are committed to Saturday opening for all libraries & maintaining Sunday opening where currently delivered.

It is proposed that the model is reviewed every two years so that libraries may move between tiers. By doing so we keep reflecting how our buildings are being used & thus continue to optimise the efficiency moving forward in to the future.

## **JUDGEMENT**

- **MEDIUM**

**I have found the Adverse Equality Impact Rating to be Medium**, as the proposed model could inevitably affect customers from a variety of backgrounds and protected characteristics; however we would put in place mitigations (identified through local engagement and as detailed below in the action plan) to minimise any impacts, so that the impact of any changes are not exacerbated for any particular group or groups. There is also the opportunity through the local engagement to better shape individual library and offer a service tailored to the community. There will be a question on this EQIA and its findings as part of the 10-week public consultation. The findings from this will be used to Update the EQIA to inform any decision on the proposal.

## GET Document Control

### Revision History

Version	Date	Authors	Comment
V0.1	16/10/2018	Darren Smart, Jonathan Carton	First draft.
V0.2	16/10/2018	Jonathan Carton	Tidying up, comments added, submitted to Darren Smart for approval of changes & dissemination to Project Board/Team for comment
V0.3	17/10/2018	Darren Smart	Revised in light of queries & comments, disseminated to Project Board/Team for comment
V0.4	19/10/2018	Darren Smart	Revised to accommodate feedback
V0.5	22/10/2018	Darren Smart	Revised to accommodate HoS feedback
V0.6	30/10/2018	Jonathan Carton	Revised to accommodate feedback from Akua and Serine
V0.7	30/10/2018	Jonathan Carton, Sarah Bottle	Final review and tidy up, disseminated to Project Board/Team
V0.8	01/11/2018	Sarah Bottle	Accept tracked changes and version saved
V1.0	01/11/18	Sarah Bottle	Final version for sign off

### 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
James Pearson	James Pearson	Head of Service	01 November 2018
Barbara Cooper		Corporate Director	01 November 2018

## **Part 1 - Screening**

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 would need to be justified according to the legal requirements

Protected Group	You <b>MUST</b> provide a brief commentary as to your findings, or this EqIA would be returned to you unsigned			High/Medium/Low Favourable Impact
	High Negative Impact	Medium Negative Impact	Low Negative Impact	
<b>All</b>		A new Library tiering model could impact the times that customers can access our physical services, through potentially reducing opening hours.		<p>We will use mosaic and other data held by LRA and KCC to identify:</p> <ul style="list-style-type: none"> <li>• Staff and customers of all ethnic groups</li> <li>• Non-users of the service</li> </ul> <p>This information will be used to consider the needs and wants of this group to ensure our service is providing the right services in the right ways for them.</p>

Age			<p>Revised Library opening hours would impact the days/times that customers could attend any given site to register a birth or death.</p>	<p>As part of the new proposed Library tiering model and opening hour review, we have redesigned our service in such a way as to ensure the service remains sustainable for the future, but also continues to meet the varied needs of Kent's many communities and peoples.</p> <p>New opening hours would be shaped based on people's feedback and we would look to have a good range of opening hours to suit different needs. Saturday opening is proposed for all Kent Libraries, this is key for people at work during the week and children, and we would look at new arrangements of hours that still allow for after 5 opening. The opening hours would be focussed on better used times.</p>
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				<p>We will also look at the pattern of opening across districts so that as far as possible offer alternative libraries to access.</p> <p>The tiering does also see some libraries increase hours where the tiering determines.</p> <p>The consultation on the strategy and Library tiering/opening hours would consider all age groups to ensure all people of Kent have the opportunity to access LRA services. People will be able to see this EQIA and comment further to inform.</p> <p>As well as our libraries, the service has other ways it can be accessed including our online services, mobile library and the Home Library Service. No changes are proposed to these</p>
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				services at this time.
<b>Disability</b>				<p>In developing this proposal we are working to ensure all of our customers, including those with disabilities, have the opportunity to access LRA services. We would consider the range of disabilities including physical, sensory, and hidden. New opening hours would be shaped based on people's feedback and we would look to have a good range of opening hours to suit different needs. Saturday opening is proposed for all Kent Libraries and we would look at new arrangements of hours that still allow for after 5 opening.</p> <p>We would consult with individual users and non-users, as well as established groups, when looking at reduced</p>

				<p>opening hours at a local level.</p> <p>Alternative provision is available through our online services and the Home Library Service.</p>
<b>Gender</b>				<p>In developing this proposal we are working to ensure all of our customers regardless of gender have the opportunity to access LRA services.</p> <p>New opening hours would be shaped based on people's feedback and we would look to have a good range of opening hours to suit different needs. Saturday opening is proposed for all Kent Libraries and we would look at new arrangements of hours that still allow for after 5 opening. The opening hours would be focussed on better used times and still offer a good</p>

				range of times to access.
<b>Gender identity/ Transgender</b>				<p>In developing this proposal we are working to ensure all of our customers regardless of their gender identity have the opportunity to access LRA services.</p> <p>New opening hours would be shaped based on peoples feedback and we would look to have a good range of opening hours to suit different needs. Saturday opening is proposed for all Kent Libraries and we would look at new arrangements of hours that still allow for after 5 opening. The opening hours would be focussed on better used times and still offer a good range of times to access.</p>
<b>Race</b>			Racial demographics can vary between districts, which may	In developing this proposal we are working to ensure all of our customers regardless of

			<p>result in some races being over- and/or under-represented in the consultation.</p>	<p>their ethnic background have the opportunity to access LRA services.</p> <p>New opening hours would be shaped based on peoples feedback and we would look to have a good range of opening hours to suit different needs. Saturday opening is proposed for all Kent Libraries and we would look at new arrangements of hours that still allow for after 5 opening. The opening hours would be focussed on better used times and still offer a good range of times to access.</p>
<b>Religion and Belief</b>		<p>A new Library tiering model and opening hours review could impact the times that people of different religions can access our Libraries through new opening hours, for example if the new</p>		<p>In developing this proposal we are working to ensure all of our customers regardless of their religion and beliefs have the opportunity to access LRA services.</p>

		Library opening hours clash with religious days.		<p>New opening hours would be shaped based on people's feedback and we would look to have a good range of opening hours to suit different needs. Saturday opening is proposed for all Kent Libraries and we would look at new arrangements of hours that still allow for after 5 opening. The opening hours would be focussed on better used times and still offer a good range of times to access.</p> <p>Consideration would be given to religious groups on a local level to ensure the service is appropriate for their needs.</p>
<b>Sexual Orientation</b>				<p>In developing this proposal we are working to ensure all of our customers regardless of sexual orientation have the opportunity to access LRA services.</p>

				<p>New opening hours would be shaped based on people's feedback and we would look to have a good range of opening hours to suit different needs. Saturday opening is proposed for all Kent Libraries and we would look at new arrangements of hours that still allow for after 5 opening. The opening hours would be focussed on better used times and still offer a good range of times to access.</p>
<b>Pregnancy and Maternity</b>			<p>Revised library opening hours would impact the days/times that customers could attend to register a birth or death.</p>	<p>In developing this proposal we are working to ensure all customers are considered.</p> <p>New opening hours would be shaped based on peoples feedback and we would look to have a good range of opening hours to suit different needs. Saturday opening is proposed for all Kent</p>

				Libraries and we would look at new arrangements of hours that still allow for after 5 opening. The opening hours would be focussed on better used times and still offer a good range of times to access.
<b>Marriage and Civil Partnerships</b>	N/A	N/A	N/A	N/A
<b>Carer's Responsibilities</b>				<p>In developing this proposal we would consider people at all stages of their lives, including caring responsibilities. We would engage with stakeholders including carers forums to better understand the needs and wants of this group, and ensure our service is providing the right services in the right ways for them.</p> <p>New opening hours would be shaped based on</p>

				<p>peoples feedback and we would look to have a good range of opening hours to suit different needs. Saturday opening is proposed for all Kent Libraries and we would look at new arrangements of hours that still allow for after 5 opening. The opening hours would be focussed on better used times and still offer a good range of times to access.</p> <p>Alternative provision is available through our online services and the Home Library Service</p>
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## **Part 2 - Full Equality Analysis /Impact Assessment**

### **From the screening grid, identify the Protected Groups impacted**

All of the protected groups would be impacted in that the new proposed tiering model and library opening hours will affect all customers of Kent Libraries.

### **Who have you involved consulted and engaged with?**

- **Residents:** LRA will consult on the principles of the Tiering model as part of the consultation on the overarching LRA Strategy. Subject to decision LRA would then engage on the pattern of opening on an individual library basis
- **Staff:** All grades of staff from all areas of the service have contributed to LRA's ambition development through a series of workshops across the County and an online interactive survey.
- **Members:** A cross party working Member working group has worked to help LRA's develop its future ambitions.

A part of the 10-week public consultation LRA will engage with a wide variety of organisations, partners and stakeholders as detailed in the action plan. This work would ensure all of the protected groups have an opportunity to shape LRA services for the future.

### **Information sources used**

Information Source	Description
Census 2011	
Spydus Registered and Active Borrowers Report	Information relating to active borrowers by diversity including age, gender, disability & ethnically
Business Intelligence Statistical Bulletin-Disability in Kent (Sep 2016)	County and district profiles reports with the most up to date social information available
Business Intelligence Statistical Bulletin-2011	County and district profiles reports with the most up to date social information available

Census: Cultural Diversity in Kent (Jan 2013)	
Library Management System-Spydus	Supports the everyday running of the library and records customer monitoring data

### Library borrowers by Age 2017-18

The Library Management System records people's date of birth. However, people are not required to give this information. Table 1 reports the proportion of our customers and which age bracket they are in. According to our data, 54,621 of our customers who actively borrowed an item between 2018-19 are aged 50 years plus. This amounts to just over 34% of our customers who are older and currently access our services and offers. Our second highest borrower group, 0-10 year olds amount to 25% of our total active borrowers

Table 1

Age	No of borrowers	Percentage of borrowers
0-10 years	41,143	25.66%
11-19 years	20,459	12.76%
20-29 years	7,693	4.79%
30-39 years	15,700	9.79%
40-49 years	16,585	10.34%
50-59 year	12,753	7.95%
60 + years	41,868	23.11%
Unknown-DOB not given	4,161	2.59%
<b>Total</b>	<b>160362</b>	<b>100%</b>

### **Library borrowers by Disability 2017-18**

According to the Business Intelligence Statistical Bulletin-*Disability in Kent*, 21.5% of the Kent population, aged between 16-64 years, are considered to be disabled based on the Equality Act or Work Limiting Disabilities core definitions. According to Spydus, our Library Management System, there were 6331 customers who held an exempt library card in October 2018. This works out to about 3.9% of our customers who could have a form of disability compared to the 7.5% of the Kent population.

However, only a small percentage of these exempt cards have a disability listed, as the Library Service can only measure a user with a disability if it is recorded on the Spydus Library Management System and customers are under no obligation to declare any disability they have. Table 2 shows the data that we hold.

**Table 2**

<b>Disability</b>	<b>No of borrowers</b>	<b>% of total borrowers</b>
Blank	159,658	99.56%
Declined to say	60	0.04%
Hearing impairment	40	0.02%
Learning impairment	162	0.10%
Long term illness	33	0.02%
Mental Health	35	0.02%
Multi disabled	27	0.02%
Not answered	78	0.05%
Physical impairment	119	0.07%
Vision impairment	150	0.09%
<b>Grand Total</b>	<b>160,362</b>	

### **Library Borrowers by Gender & Gender Identity: 2017-2018**

Currently customers can choose to identify with Female or Male when registering for a library card. They can also decide not to declare their gender with us.

Table 3 below indicates:

- a) how our customers have chosen to identify with when declaring their gender as well where they have preferred not to say. This could be through personal reasons or because our options for gender do not currently suit their needs, although we will not currently know which due to our current data collection model.
- b) The proportion of customers who are male, female or prefer not to say who have actively borrowed during 2017-18.

Table 3

<b>Gender</b>	<b>No of active borrowers</b>	<b>Percentage of active borrowers</b>
Female	86,793	54.12%
Male	49,650	30.96%
Unknown-not declared	23,918	14.92%
Other	1	>1%
<b>Total</b>	<b>160,362</b>	<b>100%</b>

Between April 2017 – March 18, 86% of our borrowers who actively borrowed at least one item in this time, had declared their gender with females being the highest percentage. It is worth noting that there is a significant proportion of people in Kent who prefer not to declare their gender when registering for the library services and could potentially identify with our LGBT Offers.

**Library Borrowers by Ethnicity: April 2017-March 2018**

Current sources of data can only show the information that is recorded on Spydus Library Management System and customers are under no obligation to declare their ethnic background. Table 4 gives an idea of the general ethnic background of our active borrowers compared to the general Kent population:

Table 4

<b>Active Library Borrowers</b>			<b>Census 2011 data</b>	
White - British	46,477	28.98%	1,303,558	89.06%
Other ethnic group	2,172	1.35%	97,804	6.68%
White other	2,242	1.39%	52,620	3.59%
East Asian/Asian British - Indian	771	0.48%	18,136	1.24%
Black/Black British - African	747	0.46%	11,523	0.79%
East Asian/Asian British - Other	597	0.37%	17,713	1.21%
White Irish	267	0.15%	10,239	0.70%
East Asian/Asian British - Chinese	239	0.14%	5,978	0.41%
Mixed/Multiple - other	193	0.12%	5,324	0.36%
Black/Black British - Other	249	0.15%	1,400	0.10%
East Asian/Asian British - Bangladeshi	145	0.09%	3,381	0.23%
Black/Black British - Caribbean	279	0.17%	3,293	0.22%
Mixed/Multiple - White and Asian	122	0.07%	7,520	0.51%
East Asian/Asian British - Pakistani	113	0.07%	2,406	0.16%
Mixed/Multiple - White and Black African	118	0.07%	2,987	0.20%
Mixed/Multiple - White and Black Caribbean	106	0.06%	Included with Caribbean category above	

White - Gypsy or Irish Traveller	95	0.05%	4,685	0.32%
Arab	48	0.02%	1,535	0.10%
Not answered/unknown	105,140	65.56%		
Declined to say	242	0.15%		
<b>Total borrowers</b>	<b>160,362</b>	<b>100.00%</b>	<b>1463740</b>	<b>100.00%</b>

### Carers

Currently, there are only 44 people who are registered as Carer's and 167 who are registered as carer's for Looked After Children on our Library Management System. This accounts for a tiny fraction of our borrowers, just over 0.1%

### **Adverse Impact,**

A medium adverse impact has been identified:

- All Groups – the proposed new Library operating model would reduce overall library opening hours by 20% which would have impact on the times that everyone can access our physical services. A good range of opening hours can still be provided alongside other ways to access the service for example our digital services would remain available 24/7, and there is a mobile library service and Home library service as well. There are no changes proposed to our mobile library service.
- Local engagement post any decision on the strategy would ensure that any local groups (e.g. talk times) are consulted with to ensure we mitigate any impact upon established groups.

### **Positive Impact:**

The new proposed Library operating model will ensure that we are deploying our resources in the most efficient manner possible, based on data and evidence of usage. By reviewing the proposed tiering levels every two years, we further ensure that individual Libraries are operating at the appropriate level, moving them between tiers if required. Tiering will also clarify what services are offered at each library & thus will support effective Marketing & Branding

The new model will enable the service to achieve its savings targets and remain sustainable for the future.

## **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. Your judgement should explicitly articulate whether you intend

- **Medium change** - potential for discrimination, however all groups would be consulted to mitigate any change in Library opening hours avoiding existing and established groups, getting a good range of opening hours to ensure opportunities for all to come We would also work to ensure changes are carefully advertised before any changes come into effect. There will be a question on this EQIA and its findings as part of the 10-week public consultation. The findings from this will be used to Update the EQIA to inform any decision on the proposal.

## Part 3 - Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Resource implications
Age	<p>A new Library operating model could impact the times that customers of all ages can access our physical services, through potentially new opening hours, changes in level of stock, number and variety of services and events offered.</p> <p>Revised library opening hours would impact the days/times that customers could attend to register a birth or death.</p>	<ul style="list-style-type: none"> <li>Local engagement will shape the pattern of opening hours co-ordinated across each district to optimise the opening hours at our 99 Libraries. This work will also look at the pattern of opening hours across a district so where possible there are also nearby alternative libraries that are open.</li> <li>Promotion of alternative ways to access the</li> </ul>	All people of Kent would have the opportunity to access LRA services	Darren Smart/Operational Management team	<p>Public consultation planned early November – late February.</p> <p>Decision made during March.</p> <p>Local consultations and implementation following this.</p>	<p>Staff time</p> <p>Consultation materials</p>

		<p>service (e.g. Home Library Service, Touch a new World (loan of an I-pad to home library service customers to trial use) digital services) throughout the consultation process and after.</p> <ul style="list-style-type: none"><li>• An Easy Read version of the consultation documentation will be developed and provided during the consultation.</li><li>• Our registration service will be co-ordinated at a district level – so while one Library may be</li></ul>				
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		<p>registering for less hours under a new model, these would be made up elsewhere within the district.</p> <ul style="list-style-type: none"> <li>• Closed days will be co-ordinated across a district to minimise impact.</li> </ul>				
Disability	A new Library operating model and revised Library opening hours would impact the times that customers with disabilities can access our libraries, through new opening hours.	<ul style="list-style-type: none"> <li>• Engage with customer groups and stakeholders such as beyond word groups and district disability forums.</li> <li>• Engage with the GET representative of Level Playing Field.</li> <li>• Promotion of remote access</li> </ul>	All people of Kent would have the opportunity to access LRA services.	LRA senior management team/Sarah Bottle to plan into customer consultation.	<p>Public consultation planned early November – late February.</p> <p>Decision made during March.</p> <p>Local consultations and implementation following this.</p>	<p>Staff time</p> <p>Consultation materials</p>

		<p>services (e.g. HLS, digital services) throughout the consultation process and after.</p> <ul style="list-style-type: none"> <li>• Promotion of TANW to encourage older people with limited digital skills to develop their knowledge so they are able to access more of our services where possible</li> <li>• An Easy Read version of the consultation documentation will be developed and provided during the consultation.</li> <li>• Closed days will</li> </ul>				
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		be co-ordinated across a district to minimise impact.				
Gender	A new Library operating model and revised library opening hours would impact the times that men and women with can access our Libraries, through new opening hours.	<ul style="list-style-type: none"> <li>The consultation will ensure everyone would have an opportunity to respond to the consultation.</li> </ul>	All people of Kent would have the opportunity to access LRA services.	LRA senior management team/Sarah Bottle to plan into customer consultation.	Public consultation planned early November – late February.  Decision made during March.  Local consultations and implementation following this.	Staff time  Consultation materials
Gender identity/ Transgender	Ensuring that everyone in Kent would have equal opportunity to access LRA services, whatever their gender identity.	<ul style="list-style-type: none"> <li>Where available and using local knowledge, we will also engage with non-KCC groups</li> <li>We will ensure that wider KCC staff groups are engaged with the</li> </ul>	All people of Kent would have the opportunity to access LRA services.	LRA senior management team/Sarah Bottle to plan into customer consultation.	Public consultation planned early November – late February.  Decision made during March.  Local consultations	Staff time  Consultation materials

		<p>consultation are aware of gender identity issues, for example the Rainbow Forum.</p> <ul style="list-style-type: none"> <li>• Closed days will be co-ordinated across a district to minimise impact.</li> </ul>			and implementation following this.	
Race	<p>Ensuring that people of all races in Kent would have equal opportunity to access LRA services.</p> <p>Racial demographics can vary between districts, which may result in some races being over- and/or under-</p>	<ul style="list-style-type: none"> <li>• We will consider the diverse ethnic makeup of the Kent population, using tools such as Mosaic and local intelligence to identify regional differences and areas/groups we should engage with.</li> <li>• We will engage with KCC's Unite group and identify any</li> </ul>	All people of Kent would have the opportunity to access LRA services.	LRA senior management team/Sarah Bottle to plan into customer consultation.	<p>Public consultation planned early November – late February.</p> <p>Decision made during March.</p> <p>Local consultations and implementation following this.</p>	<p>Staff time</p> <p>Consultation materials</p>

	represented in the consultation.	<p>impact.</p> <ul style="list-style-type: none"> <li>• An Easy Read version of the consultation documentation would be developed and provided during the consultation.</li> <li>• Closed days will be co-ordinated across a district to minimise impact.</li> </ul>				
Religion and Belief	A new library operating model and revised library opening hours would impact the times that people of different religions can access our libraries new opening hours, for example if the new Library	<ul style="list-style-type: none"> <li>• Local engagement with these groups will ensure that their views and needs are considered.</li> <li>• Consideration will be given to religious groups on the local level to ensure the service is</li> </ul>	All people of Kent are able to access our services at times that suit them.	Darren Smart/ Operational Management team	<p>Public consultation planned early November – late February.</p> <p>Decision made during March.</p> <p>Local consultations and implementation</p>	<p>Staff time</p> <p>Consultation materials</p>

	opening hours clash with religious days.	<p>appropriate for their needs; for example some religions dictate burial must happen within 24 hours, so Registration processes need to be in place where appropriate to help facilitate this.</p> <ul style="list-style-type: none"> <li>• Closed days will be co-ordinated across a district to minimise impact.</li> </ul>			following this.	
Sexual Orientation	Ensuring that everyone in Kent would have equal opportunity to access LRA services, whatever their sexual orientation.	<ul style="list-style-type: none"> <li>• We will ensure that wider KCC staff groups are engaged with the consultation are aware of gender identity issues, for example the Rainbow Forum.</li> </ul>	All people of Kent are able to access our services at times that suit them.	LRA senior management team/Sarah Bottle to plan into customer consultation.	<p>Public consultation planned early November – late February.</p> <p>Decision made during March.</p> <p>Local</p>	<p>Staff time</p> <p>Consultation materials</p>

		<ul style="list-style-type: none"> <li>• Where available and using local knowledge, we will also engage with non-KCC groups.</li> <li>• Closed days will be co-ordinated across a district to minimise impact.</li> </ul>			consultations and implementation following this.	
Pregnancy and maternity	<p>A new Library operating model and revised Library opening hours would impact the times that customers who are expecting or who have young children, can access our physical services/libraries through new opening hours.</p> <p>Revised library</p>	<ul style="list-style-type: none"> <li>• We will seek representation from pregnant women and mothers of young children through local groups, such as Baby Bounce and Rhyme Time.</li> <li>• Closed days will be co-ordinated across a district to minimise impact.</li> <li>• The Registration</li> </ul>	All people of Kent would have the opportunity to access LRA services.	LRA senior management team/Sarah Bottle to plan into customer consultation.	<p>Public consultation planned early November – late February.</p> <p>Decision made during March.</p> <p>Local consultations and implementation following this.</p>	<p>Staff time</p> <p>Consultation materials</p>

	opening hours would impact the days/times that customers could attend to register a birth or death.	service will be co-ordinated at a district level – so while one library may be registering for less hours under a new model, these would be made up elsewhere within the district.				
Marriage and civil partnerships	A new library operating model could impact the times that customers looking to give Notice of Marriage or Civil Partnership can access our Registration services, through potentially new opening hours. NOMs are only conducted a handful of sites.	<ul style="list-style-type: none"> <li>We will consider representation from customers of the Registration service.</li> <li>Closed days will be co-ordinated across a district to minimise impact.</li> </ul>	All people of Kent would have the opportunity to access LRA services.	LRA senior management team/Sarah Bottle to plan into customer consultation.	Public consultation planned early November – late February.  Decision made during March.  Local consultations and implementation following this.	Staff time  Consultation materials

Carer's Responsibilities	A new Library operating model and revised library opening hours would impact the times that carers can access our Libraries, through new opening hours.	<ul style="list-style-type: none"> <li>Local intelligence and community engagement will inform the times of day/week that these customers make use of our services and spaces.</li> <li>Closed days will be co-ordinated across a district to minimise impact.</li> </ul>	Impact to these customers' ability to use our services would be low/mitigated.	LRA senior management team/Sarah Bottle to plan into customer consultation.	<p>Public consultation planned early November – late February.</p> <p>Decision made during March.</p> <p>Local consultations and implementation following this.</p>	<p>Staff time</p> <p>Consultation materials</p>
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**Have the actions been included in your business/ service plan? Yes**

The implementation of LRA's ambitions and strategy would form part of our service plan for 2019/20 subject to decision that the strategy and the opening hours proposal would be implemented.

