

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 is 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.

A public consultation period was undertaken from 21 November 2018 to 29 January 2019, the findings have been incorporated into this next iteration of the Equality Impact Assessment. This EQIA is proposed to go forward as part of the local engagement into the individual library opening hour patterns.

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 retaining all 99 libraries. 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 have proposed 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 with the pattern of opening hours tailored as far as practical 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.

We used data from the calendar year 2017 to devise the model. Following feedback from the public consultation it is proposed that the very latest data that LRA holds pre-consultation (October 2017 – September 2018) is used to ensure the data used reflects the very latest use. The specific criteria used is as follows and is proposed to remain unchanged:

	Criteria	Why have we used this data?
Usage	Visits per hour	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. We have used 'per hour' as this is a fair way of evaluating all our libraries regardless of how many hours they are open.
	Loans per hour	It is important that we recognise our core role of providing access to books, DVDs, audio books etc. 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.
	% unique users	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.
	% public computer use	IT (Information Technology) use is an important part of the modern service and wanted to ensure this was taken into account.
	% of customers who attend events	Events & activities are another important part of the modern library service and reflect our role in combating social isolation.
	Building size	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 usage 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.

As a result of consultation feedback, we are also proposing to change how the tiers are described. We are looking to simply use numbers as shown below.

The proposed 5 tiers are below

Five Proposed Tiers of Kent Libraries					
	Tier 1	Tier 2	Tier 3	Tier 4	Tier 5
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	42	37	28	23	15
Stock available	Large comprehensive range of adult and children's fiction and non-fiction books and DVD's for loan. Local history collection	Good 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 for loan, chosen and developed to reflect local need and preferences. Some local history stock	Range of adult and children's fiction and non-fiction books for loan, chosen and developed to reflect local need and preferences. Some local history stock.	Core stock of adult and 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
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Which libraries are in each tier were detailed in the public consultation document. If implemented as proposed the model would see a reduction on average across the county of 18%. 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 was focussed on the criteria we have used. The actual library opening hour patterns will 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. This is within the parameter that the total number of hours open has been set. 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.

JUDGEMENT

- **MEDIUM**

I have found the Adverse Equality Impact Rating to be Medium. The proposed model could inevitably affect customers from a variety of backgrounds and protected characteristics. We are proposing to put in place mitigations (identified through local engagement and as detailed below in the action plan) to minimise any impacts where possible, 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 opening patterns and offer a service tailored to the community. There was a question on this EQIA and its findings as part of the 10-week public consultation. The findings from this have been used to update the EQIA to inform the 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
V1.1	19/02/2019	Sarah Bottle & Aisha Affejee	Consultation findings incorporated, disseminated to Project Board/Team, for comment
V1.2	21/02/19	Aisha Affejee	Incorporating James Pearson and Darren Smart's comments
V1.3	22/02/19	Jackie Taylor-Smith	Final LRA review
V2.0	25/02/19	Aisha Affejee	Incorporating comments from James Pearson

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	25/02/2019
Barbara Cooper		Corporate Director	

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 <i>MUST</i> provide a brief commentary as to your findings, or this EqIA would be returned to you unsigned			
	High Negative Impact	Medium Negative Impact	Low Negative Impact	High/Medium/Low Favourable Impact
All		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"> • Staff and customers of all ethnic groups • Non-users of the service <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>

<p>Age</p>		<p>Teenagers who have no access to technology at home could be impacted by reduced opening hours</p>	<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 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, 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 some after 5pm 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 considered 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.
Disability		<p>There is a potential adverse impact in reducing hours for those with a learning disability. KCC Learning disability services (adult social care strategy) encourage people to live independently and seek to reduce their own costs by saying that they should use other services during the day, e.g. libraries.</p>		<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 some 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>
Gender				<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 some after 5pm opening. The opening hours would be focussed on better used times and still offer a</p>

				good range of times to access.
Gender identity/ Transgender				<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 some after 5 opening. The opening hours would be focussed on better used times and still offer a good range of times to access.</p>
Race			Racial demographics can vary between	In developing this proposal we are working to ensure all of our

			<p>districts, which may result in some races being over- and/or under-represented in the consultation.</p>	<p>customers regardless of 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 some after 5pm opening. The opening hours would be focussed on better used times and still offer a good range of times to access.</p>
<p>Religion and Belief</p>		<p>A new Library tiering model and opening hours review could impact the times that people of different religions can access our Libraries through</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>

		<p>new opening hours, for example if the new Library opening hours clash with religious days.</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 some after 5pm 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>
Sexual Orientation				<p>In developing this proposal we are working to ensure all of our customers regardless of sexual orientation have</p>

				<p>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 some after 5pm opening. The opening hours would be focussed on better used times and still offer a good range of times to access.</p>
Pregnancy and Maternity			<p>Revised library opening hours would impact the days/times that customers could attend to register a birth or death.</p> <p>Reducing opening times and access to</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 people's feedback and we would look to have a good range of opening hours to</p>

			<p>the physical services could potentially lead to increased isolation and possible poorer mental health for pregnant women and new parents, as they may not be able to access the physical services at a time that they need</p>	<p>suit different needs. Saturday opening is proposed for all Kent Libraries and we would look at new arrangements of hours that still allow for some after 5pm opening. The opening hours would be focussed on better used times and still offer a good range of times to access.</p>
Marriage and Civil Partnerships	N/A	N/A	N/A	N/A
Carer's Responsibilities			<p>Reducing opening times and access to the physical services could potentially lead to increased isolation and possible poorer mental health</p> <p>Carers, may not be able to access the physical services at a time that they</p>	<p>In developing this proposal we will consider people at all stages of their lives, including caring responsibilities. We will 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</p>

			need	<p>for them.</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 some after 5pm 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 has consulted 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. Staff have been able to feedback on the tiering proposal as part of the public consultation.
- **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.

Stakeholder Groups	Consultation Method/Activity	Details	Accessibility Requirement
Staff	<ul style="list-style-type: none"> • Management Team briefing • Trade Union reps briefed • Briefing LRA Staff & Volunteers • Wider KCC staff 	<ul style="list-style-type: none"> • Meeting 5 November 2018 • Meetings 5/6 November • Webinar 6 November 2018 • Promoted on KNet homepage, KMail, Directorate newsletters and on KCC- 	

		wide building TV screens throughout the consultation	
Members	<ul style="list-style-type: none"> • Briefing 	<ul style="list-style-type: none"> • Paper at cabinet committee 15 November 2018 • Member Information Bulletin from Information Services Team 17 November 2018 • Hard Copy consultation material at Members' desk 21 November 2018 • Attended member briefing sessions 6th December- Swale and Canterbury & Dartford and Gravesham. 12 December Thanet and Dover 	
LRA customers – face to face promotion	<p>Between 21 November 2018 - 26 January 2019</p> <ul style="list-style-type: none"> • Online and hard copy questionnaire 	<ul style="list-style-type: none"> • Available and promoted at all service points • Postcards handed out or attention drawn to the consultation during regular groups/meetings (book clubs, baby rhyme time etc.) at Libraries during the consultation 	<ul style="list-style-type: none"> • Exhibitions/display stands in accessible parts of Library buildings • Consultation material in plain English • Hard copies of consultation document and questionnaire available in libraries, Gateways, register offices, County Hall and on request • Freepost address for hard copy questionnaire returns for

			<p>customers to use.</p> <ul style="list-style-type: none">• Easy Read version of the consultation document for people with learning disabilities – 2 copies requested by email• Consultation document available in Large Print - 4 copies requested (three by email, one by phone)• Details of how people can request the consultation documents in alternative formats on all promotional material• Library and Gateway staff briefed to provide support if required• Consultation document and questionnaire available in an accessible Word version for people using audio transcription software• Consultation document and questionnaire available in Nepalese as a translation was requested
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<p>LRA customers - online promotion</p>	<ul style="list-style-type: none"> • Direct LRA email shot • Corporate e-mailshot • Facebook 	<ul style="list-style-type: none"> • Mailchimp newsletter sent 5 December 173,938, opened by 53,140 (approx. 30%) • Invite sent via the consultation directory to 704 registered users who have expressed an interest in being kept informed of LRA and General Interest consultations • Posts on LRA Facebook pages: Main countywide FB page: 21 November 7,193 people reached; 980 Engagements; 65 shares 23 November 2,147 people reached; 146 Engagements; 11 shares 26 November 7,743 people reached; 565 Engagements; 38 shares 30 November 3,225 people reached; 190 Engagements; 9 shares 9 December 589 people reached; 12 	
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	<ul style="list-style-type: none"> • LRA public computers • Website 	<p>Engagements; 1 share</p> <p>11 December 4,127 people reached; 169 Engagements; 17 shares</p> <p>14 December 1,684 people reached; 134 Engagements; 5 shares</p> <p>18 December 2,447 people reached; 91 Engagements; 8 shares</p> <p>2 January 867 people reached; 13 Engagements; 2 shares</p> <p>22 January 1,756 people reached; 105 Engagements; 19 shares</p> <p>29 January 2,379 people reached; 147 Engagements; 12 shares</p> <p>Also shared locally on district LRA FB pages each time</p> <ul style="list-style-type: none"> • Consultation featured on library computer welcome screens • Downloads from KCC website 	
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		<p>Consultation document: 10,728</p> <ul style="list-style-type: none">• PDF document 8665• Accessible word document 490• PDF Large Print 85• Accessible word Large Print 37• Easy Read: 1443• Nepalese Translation 8 <p>Questionnaire: 447</p> <ul style="list-style-type: none">• Accessible word document 447 <p>FAQs: 563</p> <ul style="list-style-type: none">• PDF document 352• Accessible word document 211 <p>Equality Impact Assessment, Tiering Proposal: 360</p> <ul style="list-style-type: none">• PDF document 252• Word document 108 <p>Equality Impact Assessment, Draft Strategy: 418</p> <ul style="list-style-type: none">• PDF document 313• Word document 104 <p>Proposed tiering model data: 587</p>	
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		<ul style="list-style-type: none"> • PDF document 452 • Word document 135 	
<p>Wider Kent residents – may well not use the services at all or irregular users.</p>	<ul style="list-style-type: none"> • 20 x Library drop in sessions advertised widely to encourage everyone to attend • Press releases • Television • Radio • Press 	<ul style="list-style-type: none"> • 523 total customer conversations • Press release 21 November 2018 • Press release 17 January 2019 • 2 x recorded items on KMTV • Featured on BBC Radio Kent on 17, 26, 27, 28 January with a potential listenership of 68,000. • Featured in county-wide print and online newspapers, including Kent 	As above

	<ul style="list-style-type: none"> • Social Media • Online • Other 	<p>Messenger with a potential readership of 20,800.</p> <ul style="list-style-type: none"> • Featured in several local newspapers, online and in print, including, KM Faversham News, Sittingbourne News Extra, Times of Tonbridge, Folkestone and Hythe Express, KM Dartford Messenger and KM Sheerness Times Guardian • Tweets and posts from KCC's corporate social media accounts • Facebook adverts to non LRA users: People reached 11,760; Engagement 1,435 • District Councils asked to re-tweet posts • Banner on Kent.gov homepage • Posters and postcards in public buildings distributed locally 	
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<p>Other stakeholder engagement</p>	<ul style="list-style-type: none"> • Email 	<p>Consultation detail emailed to the following on 21 November & 14 January:</p> <ul style="list-style-type: none"> • Beanstalk • Childminding Service Manager, The Education People • All KCC Children's Centres (68) • Ashford Borough Council (to leader and CEO) • Canterbury City Council (to leader and CEO) • Dartford Borough Council (to Managing Director) • Dover District Council (to leader and CEO) • Folkestone & Hythe District Council (to leader and Head of Paid Service) • Gravesham Borough Council (to leader and CEO) • Maidstone Borough Council (to leader and CEO) • Sevenoaks District Council (to leader and CEO) • Swale Borough Council (to leader and CEO) • Thanet District Council (to leader 	
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		<p>and CEO)</p> <ul style="list-style-type: none">• Tonbridge & Malling Borough Council (to leader and CEO)• Tunbridge Wells Borough Council (to leader and CEO)• Early Help and Preventative Services (to the Director of Integrated Children's Services)• East Kent Mencap (to the Strategic Operations Manager and the Valuing People Now officer)• Folkestone MIND• Hi-Kent• Kent Prisons (all governors)• Home Education (to the County Access to Education Manager)• East Kent Housing Association (to Canterbury, Dover, Folkestone & Hythe and Thanet offices)• Hastoe Housing Association• Housing 21• Hyde Housing Association• Moat Housing• Sage Housing Association• Salvation Army Housing Association• West Kent Housing Association• Inclusion Support Service Kent (to	
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		<p>the virtual Head Teacher for GRT, The Education People)</p> <ul style="list-style-type: none">• KCC Rainbow Staff Forum• Kent Association for the Blind (to the Head of Client Services and Team Leader)• KCC Level Playing Field staff group• Alzheimer's & Dementia Support Services• Mental Health Action• Age UK• Arts Council England• CILIP (to the CEO)• Department for Digital, Culture, Media & Sport• Department for Work and Pensions• General Register Office (GRO)• Libraries Connected, previously SCL (to the CEO)• Dartford and Gravesham NHS Trust (to the Head of Library Services)• East Kent Hospitals University NHS Foundation Trust (to the Knowledge Services Manager, Clinical Outreach Librarian and Clinical Librarian)• Maidstone and Tunbridge Wells NHS	
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		<p>Trust (to the Head of Library & Knowledge Services)</p> <ul style="list-style-type: none">• Medway NHS Foundation Trust (to the Library Services Manager)• North Kent Independent Advisory Support• Parish & Town Councils via Kent Association of Local Councils (KALC)• Pepenbury (now Aspen – Learning Disabilities)• KCC Public Health• All LRA Reading groups• Shepway Employment & Training Forum /Reading for Wellbeing• Federation of Private Residents Associations• Royal Opera House Bridge• Medway Council (to the Leader and CEO)• Imago• Involve• Kent Youth Hubs (Ashford x 2, Canterbury, Dartford, Linwood, Maidstone, Swale, Swanley, Thanet, Tonbridge & Malling)• Thanet Over Fifties Forum (TOFFS)	
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		<ul style="list-style-type: none">• Maidstone & Mid Kent Mind• Maidstone Mencap• Take Off Folkestone• Dartford & Gravesham District Partnership Group• Kent Learning Disability Partnership Board• Canterbury Hard of Hearing Club• Maidstone Mobility Team• International Glaucoma Association• Community Alcohol Partnerships• Aspen• North Kent Independent Advisory Scheme• Gay Outdoors Club• Metro Centre (Kent & Medway)• Thanet Leisure Force• University of Kent Student Union LGBT Group• Bengali Association of Lewisham and Kent• Bells of Revival Worldwide Ministries• Diversity House• Four by Four Bhangra Youth Club• Guru Nanak Day Centre• Guru Nanak Hockey Club• Indian Overseas Congress Group UK	
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		<ul style="list-style-type: none">• Kent Zimbabwe Society - Kent Union• Maidstone Nepalese Community• Polish Association in Kent• Refugees Group• Zen• Maidstone Baptist• NWR• WKFWI• West Kent MCA• The Freedom Club• Transgender Peer Associates (TGPals)• Kent Council of Christians and Jews• Kent Liberal Jewish Community• Margate Mosque• North Kent Council for Interfaith Relations• Sikh Education & Cultural Association UK/NWKIC• Thanet & District Reform Jewish Community• Thanet Inter-faith• Global Generation Church• Kent Refugee Action Network (KRAN)• Young refugee & asylum seekers group	
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		<ul style="list-style-type: none">• British Red Cross• KRAN Refugee Youth Hub• Kent Kindness• Kent Refugee Action Group• Migrant Help• SE Strategic Partnership for Migration• Carers First• Involve Kent• Carers Ashford• Kent Young Carers• Carers Support (Canterbury, Dover & Thanet)• Rethink Sahayak Carers Service• Carers First in Kent & Medway• Carers First in South West Kent• Involve Carers Kent• Advocacy for All• The Bridge Trust• Caring Hands• Tunbridge Wells Churches Street Teams• House of Mercy - help single homeless• West Kent YMCA 16-25 yrs• Emmaus, Dover• Folkestone Rainbow Centre• Social Enterprise Kent CIC	
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		<ul style="list-style-type: none"> • Kent Invicta Chamber of Commerce • Active Business Group (ABG) Networking Association • Thanet & East Kent Chamber • Stronger Kent Communities <p>Consultation communicated at:</p> <ul style="list-style-type: none"> • Kent Safeguarding Children Board • Kent Safeguarding Children Board – online safety sub group • Kent & Medway Growth Hub • Kent Youth County Council 12 January • Children’s Centre meeting (with Improvement Officer, Information & Intelligence) • Booktrust (with Regional Manager) • Home Education meeting (with County Access to Education Manager - for Elective Home Education families) <ul style="list-style-type: none"> • Featured in Kelsi Newsletter 	
Members	<ul style="list-style-type: none"> • Email 	<p>KCC Members</p> <ul style="list-style-type: none"> • Email from Mr. Hill to all KCC Members 	

		requesting promotion to their constituents	
Members of Parliament	<ul style="list-style-type: none">• Letter	<ul style="list-style-type: none">• Letter from Mr. Hill to all Kent MPs	

Results from the public consultation

5,547 responses to the consultation have been received

- 5,337 individuals (accounting for 96% of the sample)
- 177 organisations/groups (accounting for 3% of the sample)
- 1% unknown (left question blank)

Profile of individuals compared to LRA borrower profile and census statistics (age and gender)

	2011 Census Population	Kent LRA Borrower Profile*	Profile of LRA consultation response
GENDER			
Male	48%	36%	37%
Female	52%	64%	63%
AGE			
Under 50	63%	65%	26%
50+	37%	35%	74%

*Excludes blanks or unknown, based on 2017-2018 data

Profile of individuals responding

- Online was the most common completion method with 68% taking part in the consultation using this method. 32% submitted their response on paper;

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 Census: Cultural Diversity in Kent (Jan 2013)	County and district profiles reports with the most up to date social information available
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%
Total	160362	100%

74% of individuals who responded to the consultation were aged 50 or over;

There were 142 comments relating specifically to the age protected characteristic in response to this EqlA. In summary, it was felt that older communities and children could be adversely impacted by a reduction in opening hours and that teenagers who have not got access to technology at home had not been included. The Wordle below highlights the key themes of these comments:

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

Disability	No of borrowers	% of total borrowers
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%
Grand Total	160,362	

11% of responders to the consultation considered themselves disabled as set out in the Equality Act 2010. 44% of these indicated they have a physical impairment and 28% indicated they have a sensory impairment. 35% have a long-standing illness or health condition.

There were 99 comments relating specifically to the disability protected characteristic in response to this EqIA. In summary it was felt that this group of customers who depend upon the services of the library would be adversely impacted by reduced opening hours. Specific comments included:

Learning disability:

“EqIA does not appear to address learning disability. There is a contradiction with learning disability services who encourage people to live independently and seek to reduce their own costs by saying that they should use other services during the day, e.g. libraries. The reduction in hours will prevent this, hence the two Kent policies are in tension. The EqIA and strategy needs to address this. For example, New Romney, which has a number of learning-disabled residents, is reducing from 45 to 28 hours. Whilst I understand this from the perspective of this consultation, it directly contravenes the adult social care strategy.”

Mental Health:

“Yes as a person with severe mental health issues and adhd sensory issues like many in the town of Herne Bay I would find the losing of library hours or reduction very detrimental to my mental health as it is seen as a safe place a haven if you like a quiet place I can go if it's too loud and gather myself read a book in peace or just be able to sit and browse the books or sit and be calm. I enjoy the library and like the opening hours as I use it a lot numerous times a week sometimes more than twice a day on a weekly basis so changing the hours would highly affect me and my mental health and severely distress me ...I do not cope well with any type of change and this is not something I want”

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

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

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.

63% of the individuals who responded to the consultation were female. There were no specific comments regarding these protected characteristics and the tiering model.

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

Active Library Borrowers			Census 2011 data	
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%		
Total borrowers	160,362	100.00%	1463740	100.00%

96% of individuals who responded to the consultation indicated they are White and 4% indicated they are of BME origin; 47% of the individuals indicated they belonged to a religion or belief;

There were no specific comments regarding religion or ethnicity relating to the tiering model.

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%
9% of consultation respondents indicated they were a carer.

Adverse Impact,

A medium adverse impact has been identified:

- All Groups – the proposed new Library operating model would reduce overall library opening hours by 18% 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, 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 engaged with to ensure we mitigate any impact upon established groups.
- The consultation responses raised specifically impacts on the elderly, children, students, the employed, ethnicity/religion and gender which have confirmed some of our original potential impacts and highlighted the need for the action plan and proposed mitigations put forward.

Positive Impact:

The new proposed Library opening hours 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 and ensuring we are tailoring service to local places.

The new model will enable the service to maintain 99 libraries, 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 engaged to mitigate changes in Library opening hours where possible, 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. The findings from the recent public consultation have been used to update this EQIA which will be used to inform the decision on the proposal.

Part 3 - Action Plan

Protected Characteristic	Issues identified	Action to be taken	Expected outcomes	Owner	Timescale	Resource implication
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"> 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. Promotion of alternative ways to access the 	All people of Kent would have the opportunity to access LRA services	Darren Smart/Operational Management team	<p>Public consultation completed.</p> <p>Local engagement on library opening hour patterns and implementation following decision in March 2019</p>	Staff time

		<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">• An Easy Read version of the consultation documentation was developed and provided during the consultation.• Our registration service will be co-ordinated at a district level – so while one Library may be				
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	<p>Teenagers who have no access to technology at home could be impacted by reduced opening hours</p>	<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">• Closed days will be co-ordinated across a district to minimise impact. <p>Closed hours will be co-ordinated to ensure a spread of opening hour options to incorporate after school access to public PCs. Saturday opening hours are proposed for all libraries</p>				
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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"> • Engage with customer groups and stakeholders such as beyond word groups and district disability forums. • Engage with the GET representative of Level Playing Field. • Promotion of remote access services (e.g. HLS, digital services) throughout the consultation process and after. • Promotion of TANW to encourage older people with limited digital skills to develop their knowledge 	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 completed Local engagement and implementation following decision in March 2019	Staff time engagement materials
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	<p>There is a potential adverse impact in reducing hours for those with a learning disability. KCC Learning disability services (adult social care strategy)</p>	<p>so they are able to access more of our services where possible</p> <ul style="list-style-type: none"> • An Easy Read version of the consultation documentation will be developed and provided during the consultation. <p>Closed days will be co-ordinated across a district to minimise impact.</p> <p>Impact minimised through discussion with Adult Social Care Services- Those with learning disabilities will still be able to access the library service and we will work to ensure customers informed and our new hours are clearly advertised.</p>		<p>Darren Smart</p>		
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	encourage people to live independently and seek to reduce their own costs by saying that they should use other services during the day, e.g. libraries.					
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	<ul style="list-style-type: none"> The consultation worked to ensure everyone would have an opportunity to respond 	All people of Kent would have the opportunity to access LRA services.	LRA senior management team/Sarah Bottle to plan into customer consultation.	Local engagement and implementation following decision in March 2019	Staff time

	new opening hours.					
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"> • Consultation made use of local knowledge to make non-KCC groups aware. • We made wider KCC staff groups aware of the consultation are aware of gender identity issues, for example the Rainbow Forum. • Closed days will be co-ordinated across a district to minimise impact. 	All people of Kent would have the opportunity to access LRA services.	LRA senior management team/Sarah Bottle to plan into customer consultation.	Local engagement and implementation following decision in March 2019	Staff time
Race	Ensuring that people of all races in Kent would have equal opportunity to access LRA	<ul style="list-style-type: none"> • We looked to engage/make aware different ethnic groups • We made the 	All people of Kent would have the opportunity to access LRA services.	LRA senior management team/Sarah Bottle to plan into customer consultation.	Local engagement on library opening patterns and	Staff time

	<p>services.</p> <p>Racial demographics can vary between districts, which may result in some races being over- and/or under-represented in the consultation.</p>	<p>KCC's Unite group aware of the consultation</p> <ul style="list-style-type: none"> • An Easy Read version of the consultation documentation was developed and provided during the consultation. • Closed days will be co-ordinated across a district to minimise impact. 			<p>implementation following decision in March 2019</p>	
<p>Religion and Belief</p>	<p>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</p>	<ul style="list-style-type: none"> • Local engagement with these groups will ensure that their views and needs are considered. • Consideration will be given to religious groups on the local level 	<p>All people of Kent are able to access our services at times that suit them.</p>	<p>Darren Smart/ Operational Management team</p>	<p>Local engagement on library opening patterns and implementation following decision in March 2019</p>	<p>Staff time</p>

	example if the new Library opening hours clash with religious days.	<p>to ensure the service is 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"> • Closed days will be co-ordinated across a district to minimise impact. 				
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"> • We made wider KCC staff groups aware of the consultation, for example the Rainbow Forum. • Where available 	All people of Kent are able to access our services at times that suit them.	LRA senior management team	Public consultation completed, Local engagement and implementation	Staff time

		<p>and using local knowledge, we will also engage with non-KCC groups.</p> <ul style="list-style-type: none"> • Closed days will be co-ordinated across a district to minimise impact. 			following decision in March 2019	
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 opening hours would impact the</p>	<ul style="list-style-type: none"> • We will seek representation from pregnant women and mothers of young children through local groups, such as Baby Bounce and Rhyme Time. • Closed days will be co-ordinated across a district to minimise impact. • The Registration 	All people of Kent would have the opportunity to access LRA services.	LRA senior management team	<p>Public consultation completed</p> <p>Local engagement and implementation following decision in March 2019</p>	Staff time

	<p>days/times that customers could attend to register a birth or death.</p> <p>Reducing opening times and access to the physical services could potentially lead to increased isolation and possible poorer mental health for pregnant women and new parents, as they may not be able to access the physical services at a time that they need</p>	<p>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.</p> <ul style="list-style-type: none"> • Closed days will be co-ordinated across a district to minimise impact. 				
Marriage and civil partnerships	<p>A new library operating model could impact the times that customers looking to give Notice of Marriage or Civil Partnership can access our</p>	<ul style="list-style-type: none"> • We will consider representation from customers of the Registration service. • Closed days will be co-ordinated 	<p>All people of Kent would have the opportunity to access LRA services.</p>	<p>LRA senior management team</p>	<p>Local engagement on library opening patterns and implementation following decision in March 2019</p>	<p>Staff time</p>

	Registration services, through potentially new opening hours. NOMs are only conducted a handful of sites.	across a district to minimise impact.				
Carer's Responsibilities	<p>A new Library operating model and revised library opening hours would impact the times that carers can access our Libraries, through new opening hours.</p> <p>Reducing opening times and access to the physical services could potentially lead to increased isolation and possible poorer mental health for Carers, as they may not be able to access the physical</p>	<ul style="list-style-type: none"> Local intelligence and community engagement will inform the times of day/week that these customers make use of our services and spaces. Closed days will be co-ordinated across a district to minimise impact. 	Impact to these customers' ability to use our services would be low/mitigated.	LRA senior management team	<p>Public consultation completed</p> <p>Local engagement and implementation following decision in March 2019</p>	Staff time

	services at a time that they need					
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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.

