

Equality Impact Assessment (EIA)

Name of Policy or Practice	Relocation of library services in Conwy, Deganwy and Llandudno Junction and closure of existing library building at Conwy		
Head of Service responsible for the Policy or Practice	Marianne Jackson, Head of Community Development Service		
Name of officer (s) completing impact assessment form	Sheila Evans – Library Development Officer		
Service	Community Development Service – Culture and Information	Date of Assessment	Updated 6/8/2014

EIA Completed by :		EIA Agreed by Head of Service :	
Date	18/8/2014	Date	18/8/2014
Name(s)	Sheila Evans	Name	Marianne Jackson
Signature(s)	S. Evans	Signature	M Jackson

STEP 1 – Identify the Main Aims and Objectives of the Policy or Practice

1. What is being assessed? (***Please double click on the box and select 'checked' as appropriate to cross X***)

- New and revised policies or practices
- New procedures (which modify service delivery or employment practices)
- Service review or re-organisation proposals which affect the community and/or staff
- Efficiency or saving proposals
- Setting budget allocations for new financial year
- Decisions affecting service users, employees or the wider community
- New project proposals affecting staff, communities or accessibility to the built environment, e.g., new construction work or adaptations to existing buildings
- Other please explain in the box below:

2. What are the overall aims and objectives of the policy or practice?

Background

In September 2007, the Learning and Creativity Scrutiny Committee established a Task and Finish Group to advise on the future direction of the Library Service. They recommended that a 'new single modern library should be built for Conwy, Deganwy and Llandudno Junction.'

Following extensive consultation with public and staff, review of the Welsh Public Library Standards (WPLS) and review of research carried out in 2006 with non-users of the Service, a Strategy for Modernising Conwy's Library Service was approved by Cabinet in December 2011. This Strategy ensures an equitable and sustainable service meeting most of the requirements of the WPLS without significant additional resources. A new / refurbished area library serving the Llandudno Junction, Deganwy and Conwy area is proposed as part of the Strategy. The service provided at this area library will be enhanced and tailored to meet local needs.

Conwy Library

The current Conwy Library is a medium sized library, which is open 33 hours per week and attracts just over 34,000 visits p.a. or approximately 21 visits per hour open. This library is used by local residents, the wider local community and tourists. It had 1,224 registered “active borrowers” [as CIPFA definition of active borrowers] in 2013/14: 934 adults and 290 children and 373 “unique” users of the Public Access computers. From the *Adult PLUS User Survey, 2012*, 48% of the adults who used the library were aged 65 years or above, with 34% declaring some sort of disability (11% declaring mobility impairments). The *Children’s PLUS User Survey, 2011* showed that this library is used by children of all ages.

Usage and Performance figures for Conwy Library 2013/14

Visitor Figures	34,209
Items loaned	30,144
Enquiries annual total	8,719
Computer usage – total sessions	10,303
Events (including those for children)	79

Hours open per week	Visitors per annum	Visitors per hour open	Items loaned per hour open	Computer session per hour open
33	34,209	21	18	6

Proposals

- It is proposed to close the Deganwy, Llandudno Junction and Conwy libraries and to replace them with a new Area library for this whole community.
- The proposed new Area library will give people within these communities access to a new / refurbished library building with better facilities and more services e.g. space for more children’s activities, customer car parking, disabled access and meeting room space.
- The closure of this library will help the Service remain cost-effective, enabling the Service to target library provision where it is most needed.

3. Who is the policy or practice intended to help or benefit (stakeholders)?

- By closing this library and offering the community a new area library, we will ensure that we are offering library users a building that is “fit for purpose” and a greater range of library services.
- The people within all 3 communities of Deganwy, Llandudno Junction and Conwy will benefit from the provision of a new / refurbished area library with better opening hours, improved facilities and more consistent services.
- When Conwy Library is closed, if the new Area library* is not based within the town of Conwy itself, we will offer additional Mobile library stops within this community, which will be targeted where they are most needed. *Location yet to be decided
- When we close Conwy Library, if the new Area library is based within the town of Conwy itself, this will offer the town a new, improved community resource. *Location yet to be decided

4. Who are the main consultative groups or communities of interest?

- Current users of Conwy library.
- The people who live in Conwy and surrounding areas.
- Elected members representing this area.
- Town & Community Councillors from all the Wards within this area.
- Library staff and council staff.
- Representatives from protected characteristic groups.
- Any agencies we work in partnership with.

STEP 2 - Consider Existing Information and What This Tells You

When completing this section, you need to consider if you have sufficient information with which to complete your EIA, or whether you need to undertake a period of engagement/consultation before continuing. The legislation relating to the EIA process requires you to **engage and involve people who represent the interests of those who share one or more of the protected characteristics and with those who have an interest in the way you carry out your functions**. This needs to be proportionate to the policy or practice being Equality Impact Assessed. You may have already recently undertaken consultation specifically on this policy or practice. Other officers within CCBC may have carried out engagement work which will be relevant to this EIA and you can review the Community Involvement Database to find out what engagement activities have taken place in Conwy and establish if this is relevant. If you

have very little or no information from previous engagement that is relevant to this EIA, you should consider undertaking some engagement work with your stakeholders and with relevant representative groups to ensure that you do not unwittingly overlook the needs of each protected group.

5. What do you already know about the impact on each protected characteristic from your experience of current service delivery or previous engagement or consultation? You could refer to the Initial Equality Impact Assessment Screening Form and the Community Involvement Database.

Protected Group	Relevance of the policy / practice by protected characteristic
Race	<ul style="list-style-type: none"> ○ Closure of this library could mean the loss of access to a range of diverse reading material, offered by a static library. ○ Closure of this library could mean the loss of free internet usage allowing customers to access a wide range of information in other languages. ○ Closure of this library could also mean a loss of “<i>The Big Word</i>” translation and interpretation Service which is available to customers on request (though we are not aware this has ever been requested at this library). <p><u>Mitigating Factors</u></p> <ul style="list-style-type: none"> ○ According to the 2012 <i>Adult PLUS User Survey</i>, adult users of Conwy library were: 100% White; 98% British or Irish whilst according to the last Census Data (2011) for the Conwy County Borough showed: 96.1 % of the population were White British or White Irish. Therefore, it is unlikely that there will be an impact on this group. ○ We are not aware, from our phone records, that “<i>The Big Word</i>” service has ever been requested by people using Conwy Library. ○ The ‘new’ area library will offer a good diversity of stock. ○ Access to the stock in all libraries is available by ordering through an electronic catalogue (24/7) to be picked up at a library of choice. ○ Access to a range of reading material and the ability to request additional material via the Mobile library, one any new Mobile library stops are in place (if the new area library is not located in Conwy). ○ Groups such as NWREN were made aware of the <i>Modernising Libraries Consultation 2011</i> but we did not receive any feedback to show there were any specific issues affecting people from

	<p>different races in this community.</p> <ul style="list-style-type: none"> ○ The Library Service website has a link to the <i>iBawb</i> site, which enables people to access information about Conwy Library Service in 12 different languages, which has been promoted via NWREN.
Disability	<p>According to the 2012 <i>Adult PLUS User Survey</i>:</p> <ul style="list-style-type: none"> ○ 27% of the adults using Conwy Library recorded having one or more disabilities; of these users 15% had mobility impairments and 9% hearing impairments. <p>According to the 2011 Census data for Conwy County Borough Council 24.2% of the population have some sort of limiting longer term illness [12.2% have their “day to day activities limited a lot” ; 12.2% have their activities limited a little].</p> <p><u>Loss of access to information</u></p> <ul style="list-style-type: none"> ○ Loss of the opportunity to signpost users to relevant information about health and well-being services, e.g. local support groups for health conditions or relevant social services information. <p><u>Loss of access to a service for those with Mental Health issues</u></p> <ul style="list-style-type: none"> ○ The library currently offers access to the “<i>Books on Prescription</i>” scheme for those with mild to moderate emotional and psychological problems. Access to this service would be lost if this library were closed, though this service will be available in the new area library and via the Mobile Library. <p><u>Mitigating Factors</u></p> <ul style="list-style-type: none"> ○ If the new area library is not located within Conwy we will ensure that this group can still access the above services via the Mobile library by ensuring Mobile library stops are placed in areas of the community where they are most needed. ○ We will need to ensure that anyone with severe mobility impairments is transferred to the Home Library Service when this library closes. ○ The new Area Library will be larger than the existing Conwy Library and will provide a greater range of book-stock, including access to the <i>Books on Prescription Scheme</i> and other books and information on health and well-being. ○ The books can also be ordered electronically from home using our Online Catalogue (or requested via the Mobile Library) to be collected at a library of choice or via the Mobile library. ○ The current accessibility of Conwy library is questionable, as there are: <ul style="list-style-type: none"> ○ no automatic/ assisted power doors;

	<ul style="list-style-type: none"> ○ no public or disabled toilets; ○ Split levels within the library, with the reference library being located at a higher level which can currently only be accessed via a stairway. ○ The “new” Area library however will be an accessible facility for the whole community to use. ○ Conwy Access Group, Disability Wales, the Physical Disability Action Group based in Llandudno, North Wales MIND, HAFAL, North Wales Deaf and NW Blind Association were all made aware of the Modernising Libraries Consultation; they were also asked to promote it specifically to their members and were invited to stakeholder group meetings. ○ The stakeholder workshops that took place for each community, looked specifically at the impact on vulnerable groups and access to services.
Sex	<p>The 2011 Census for Conwy County Borough showed that 51.6% of the population were female. The 2012 <i>Adult PLUS User Survey</i> showed that 60% of adults using Conwy library were female. Closure of this library could, therefore, have an indirect differential impact on women in this area.</p> <p><u>Mitigating Factors:</u></p> <ul style="list-style-type: none"> ○ If the new Area library is not located in Conwy, we will ensure that this group can still access library services via the Mobile library by providing Mobile stops in specific areas within the community where the need is greatest. ○ The new area library (and all other area libraries) will offer a good choice of book stock that will be of relevance to women; this can be accessed directly or ordered via our Online Catalogue to be collected at a library of their choice. ○ The new area library is likely to be more accessible for women with prams. ○ The new area library will offer more activities for families, including parents/carers with children.
Age	<p>The Conwy County Borough has the largest proportion of post-retirement age (65 years and older) population in Wales (Census 2011) at 24.7%, while Small Area Statistics for the ward of Conwy show 22% of residents are aged 65 years or over (Census 2011).</p> <p>In 2013/14, Conwy Library had 1,224 registered “active borrowers” [**as CIPFA definition of active borrowers] :- 934 adults and 290 children. According to the 2012, <i>Adult PLUS User Survey</i>, 48% of the adults using Conwy library were 65 years or older, while the 2011 <i>Children’s PLUS Survey</i> showed that 61% of children using this library were aged 10 years or under. The Library Service (2013-14) in-service statistics showed that the ratio of adults to children (aged under 16 years) using the library was: 90%</p>

adults to 10% children.

Access to Services

- If Conwy library closes, and the new Area library is not located in Conwy, this could impact on older people, especially those with mobility impairments, who could lose access to services such as free internet access, purchase of green garden sacks and useful signposting information to relevant support/ health and well-being services.

Social Isolation.

- According to the *Conwy Older People's Strategy (2012)* the well-being of older people is very much dependent on social support and an "engaged lifestyle". If Conwy library closes, and the new Area library is not located in Conwy, this could mean the loss of a community meeting place for older people with a possible associated loss of social networks and increase social isolation.

Increased Travel Time

- Conwy Library is 1.25 miles from Llandudno Junction, so if the current library closes and the new area library is located in Llandudno Junction, this will mean a greater distance to travel on public transport for those who need to access other libraries.
- In the Conwy ward, 19.8% of the population do not have a car (Census 2011), which could impact on older people in terms of further travel. Although pensioners in Conwy are eligible for free bus passes, it is recognised that some of them may not be able to use or access public transport.

Impact on Children and Young People

- If the new library is not located in Conwy, this could impact on younger children who would be unable to travel alone to another library, as according to the *Children's PLUS User Survey (2011)* 71% of children using this library were 10 years of age or under.
- It could also impact on young children by loss of access to the Summer Reading Challenge (SRC), to children's activities and the loss of free internet access and homework resources.

Mitigating Factors

- As part of the *Modernising Libraries* Consultation stakeholder workshops were undertaken with children and young people who represented a number of different libraries across the County. Findings from this Workshop, showed the most important issues to children in terms of their needs is as follows (listed in priority order)

	<ol style="list-style-type: none"> 1) Having good books to borrow 2) Having library staff to help me 3) Having a library near my home 4) Having a library that looks nice and welcoming 5) Having a library that is open after school and at weekends 6) Having activities and events in the libraries that I can take part in 7) Having access to up to date computers and the internet. <p>The new area library will specifically help to meet points 1,2, 4-7 (as listed above).</p> <ul style="list-style-type: none"> ○ Pensioners in Conwy have concessionary bus passes, so will not lose out financially by having to travel further. ○ If the new Area library is not located in Conwy, we will establish Mobile library stops at central locations within the community where the need is greatest. ○ For those who drive to the new Area library, they will be better parking facilities than is now available at the current Conwy library. ○ Children from Conwy will still have access to the SRC either via the new area library or via the Mobile library. ○ There will be more activities for children and families at the new Area library. ○ Women with pushchairs and buggies will find it easier to access the new Area library.
<p>Religion & Belief</p>	<p>According to the 2012 <i>Adult PLUS User Survey</i>, 1% of users of the current Conwy library are Buddhist; 0% Hindu, Muslim, Jewish or Sikh.</p> <p>The 2011 Census data for the Conwy County Borough showed that 0.5% of the population are Muslim, while less than 0.5% are Buddhist, Hindu, Jewish or Sikh.</p> <p>We are not aware, therefore, that this group would be specifically affected by the proposed changes. However, anyone within this group could suffer loss of access to the diverse range of stock offered in a static library if the new Area library is not located in Conwy and people choose to use the Mobile library instead of using a new Area library in Llandudno Junction.</p> <p><u>Mitigating factors:</u></p> <ul style="list-style-type: none"> ○ A large and diverse range of stock will be available at the new Area Library ○ A large range of stock is also on (or can be ordered from) the Mobile library. ○ Relevant stock can be requested electronically via our Online Catalogue to be picked up at

	<p>either at the new Area library, the Mobile library or any other library of their choice.</p> <ul style="list-style-type: none"> ○ We did not receive feedback from the <i>Modernising Libraries</i> public consultation (2011) to show that there were any specific issues affecting people of different race. ○ The Conwy IMAN Centre in Llandudno Junction was contacted and asked specifically to contribute to the consultation.
Sexual Orientation	<ul style="list-style-type: none"> ○ According to the 2012, <i>Adult PLUS User Survey</i>, 2% of adult users of Conwy library are LGB. <p>We are not aware that this group would specifically be affected by closure of this library.</p> <p><u>Mitigating Factors</u></p> <ul style="list-style-type: none"> ○ We did not receive any feedback from the <i>Modernising Libraries</i> public consultation (2011) to show that there are any specific issues affecting people from this group. ○ The North Wales LGBT Foundation (Lesbian, Gay, Bisexual, Transgender focus) were specifically asked to contribute to the Consultation.
Gender Reassignment	<p>We are not aware that this group would specifically be affected by the proposed changes and the “Unique Transgender Network” which covers North Wales was specifically asked to contribute to the consultation.</p>
Marriage & Civil Partnership	<p>We are not aware that this group would specifically be affected by the proposed changes.</p>
Pregnancy & Maternity	<p>We are not aware that this group would specifically be affected by closure of this library, as no specific feedback was received from the consultation.</p> <p><u>Mitigating Factors</u> Baby changing and breast feeding facilities will be provided in the area library.</p>
Welsh Language	<p>Census data (2011) show that 27.4% of the population of Conwy County is Welsh speaking, while Ward statistics (Conwy 2011) showed that 28.78% of the population of Conwy speaks Welsh. Conwy library currently has a number of Welsh speaking staff and offers access to bilingual & Welsh language book-stock and bilingual council information and other “official” information. Closure of this library (and relocation of the new area library elsewhere) could potentially reduce access to a bilingual facility for Welsh speakers in this community.</p>

	<p><u>Mitigating factors</u></p> <ul style="list-style-type: none"> ○ We will ensure there is still access to these services for Welsh speakers by providing either a service to this community via the Mobile Library, which adheres to the Welsh Language Scheme or through access to the new area library which will also adhere to the Welsh Language Scheme. ○ Welsh language stock can also be ordered online (24/7) and picked up at any library of choice.
Other (please state)	<p><u>Economic Deprivation</u></p> <ul style="list-style-type: none"> ○ Although those claiming Unemployment Benefit in the Ward of Conwy was 2.3% (August 2013, Ward profile) the number of those aged 16-24 claiming Unemployment Benefit was 28.8% (Nomis 2013). So, there could be an effect on this group, if they need to travel further to access the new Area library. <p><u>Mitigating factors</u></p> <ul style="list-style-type: none"> ○ The new area library will offer additional services to the unemployed/ job seekers. ○ Staff in the new area Library will work in partnership with this community to ensure adequate promotion and marketing of the new library. ○ We will work with the local community to promote any new Mobile library stops.

6. Summarise the additional relevant data, research and performance management information you already have:

Data / Information	Examples
<p>The Initial EIA Screening document suggests that the main “protected characteristic groups” that would be affected by this closure of this library would be: Older people, Women, Disabled People, young children and Welsh speakers.</p> <p>According to the 2011 Census data for the Conwy County Borough:</p> <ul style="list-style-type: none"> o 96.1% of the population is of White British or Irish origin o 51.6% are female; 24.2% have a <i>limiting long terms illness (LLL)</i> o 24.7% are aged 65 years or older; 17.1% are pensioners living alone o 0.5% are Muslim; 0.5% are Buddhist, Hindu, Jewish or Sikh. <p>Other specific data on protected groups is outlined in <u>question 5</u> above and in the data below:</p> <p>Complaints/ Service User Data There have been several complaints from service users, including disabled people, about the lack of toilet facilities in this building.</p> <p>Accessibility Audit – Conwy Library (2013) There are problems with site constraints at the current building, e.g. no external road signs are allowed. The entrance doors are too narrow and need replacing with automatic or assisted doors, while all internal doors are also too narrow, failing to comply with standards. Much of the current flooring is unsuitable for disabled users, as is the current library counter.</p> <p>The Census data for the ward Conwy Ward (2011) showed the following:</p> <ul style="list-style-type: none"> o 22% of this population are of pensionable age o 28.7%.are Welsh speakers o 19.8% have no car though there is a regular bus service to Llandudno Junction o 2.3% were unemployed; 28.8% of 16-24 years old were claiming Unemployment Benefit (Aug 2013) o 36.5% have an income below the <i>60% GB median</i> o Part of the Conwy ward is listed in the top 10% of the Welsh Index of Multiple Deprivation for Housing (2011) <p>Feedback from the <i>Modernising Libraries</i> Public Consultation (4 July – 26 August 2011) showed that those</p>	<p>Initial EIA Screening Complaints Compliments Service User data Service User Feedback Inspections or Audits</p>

<p>using Conwy library were appreciative of the service and most users are very keen for this library to stay open. Some users said they would find it difficult to access the new Area library if it is not located within Conwy. Overall, many people living within this community felt strongly that locating the new library in the town of Conwy is important as a community resource for both locals and the many tourists to this locality.</p>	
<p>Research or Comparative Information</p> <p>There is currently inconsistency in different towns and villages in Conwy County Borough in terms of the size and location of its' libraries, which is due to historical / building and financial constraints.</p> <p>In 2011, Conwy Library Service undertook a review of its Service and carried out widespread Public Consultation with both library users and non users in the <i>Modernisation of Libraries</i> Consultation. Results from this consultation (as discussed above) together with the requirements of the Welsh Public Libraries Standards (WPLS) are the key drivers for the Library Modernisation programme, which is being undertaken after it was shown that retaining the library service in its current form was not sustainable without significant investment.</p> <p><i>Twelfth Man (2006)</i> undertook research on the use of public libraries by the general public (users and non users). This Report also informed our <i>Modernising Libraries</i> strategy, as it recommended that without major changes and sufficient promotion of library services, non-users would continue not to be attracted to libraries. The recommendations from this Report suggested that in order to move forward, libraries need to build partnerships with other services by becoming “centres of learning” and “community builders” in order to retain relevance.</p> <p><i>The Welsh Index of Multiple Deprivation (WIMD) 2011</i> is the official measure of deprivation in Wales, part of which is based on “access to a range of services considered necessary for day-to-day living” (including access to public libraries). Currently, six areas within Conwy County Borough feature in the 10% most deprived areas in Wales with regard to “physical environment”, which includes part of the Conwy ward.</p> <p>However, isolation of older people is not limited to rural communities, as one in five households is occupied by a single pensioner in the Conwy ward (Census 2011). A significant number of these people may not have local family support, having moved to the area to retire, so we need to be aware of this when planning services.</p>	<p>Examples</p> <p>Service User Surveys Studies by Government departments or professional bodies Census data Service based projects and research How Fair Is Wales (EHRC data)</p>

The *Public Library User Survey, PLUS* – is a national model for surveying users of public libraries concerning various aspects of the service. It offers a uniform methodology in its approach, giving it validity for national, regional and local comparisons. Relevant Equalities Data from the last Adult PLUS User Survey (2012) also gathered for Conwy Library has been used to help inform this assessment.

See section 5 for further information on protected group and mitigating factors.

7. Have you complied with the duty to Engage as described at the start of this section and are you sufficiently informed to proceed?

Yes No **(please cross as appropriate X)** If Yes, please proceed to Step 3

If No, you may wish to consider pausing at this point while you undertake engagement activities (which you should add to your action plan – Step 6). Please incorporate any information you have obtained from this additional activity in the box below and state what the key findings were:

A public consultation on the *Modernising Libraries Strategy* was undertaken in 2011, including separate stakeholder workshops. Organisations representing protected characteristic groups were contacted about the consultation and asked to specifically promote it to their members. Feedback from the consultation has helped us inform our decision to proceed with the development of an area library.

STEP 3 - Procurement and Partnerships

The public sector General Duty means all public authorities need to consider the needs of different groups when designing and delivering public services. This duty also applies to private sector organisations who deliver a public function on our behalf and we need to ensure that those organisations exercise those functions by ensuring our procurement and monitoring of those services complies with the General Duty.

8. Is this policy or practice to be carried out wholly or partly by contractors or in partnership with another organisation(s)?

Yes No **(please cross as appropriate X)** If No, please proceed to Step 4

9. If yes, how will you comply with Equality, Human Rights and Welsh Language Legislation? Think about :

Procurement

- Setting out clear equality expectations in Tendering and Specification documentation
- On what you based your decisions in the award process
- That contract clauses cover legislative equality requirements
- Performance and Monitoring measures are included to monitor compliance

Partnerships

Who is responsible for :

- Equality Monitoring relevant data
- Equality Impact Assessment
- Delivering the actions from the EIA
- Ensuring that equality, human rights and Welsh Language legislation is complied with by all partners

STEP 4 - Assessing the Impact

10. Is there any evidence of higher or lower take-up or satisfaction by any group(s), and if so, how is this explained?

Yes, the “community response” from the *Modernisation Libraries* Consultation suggests that it is mainly older people, especially those with some sort of mobility impairments who feel the closure of Conwy library would have an impact on them. Some people felt they would not be able to easily access the new library if it is located in another community.

Many people in Conwy also think it is important to have a library in a town the size of Conwy.

The *2012 Adult PLUS User Survey* showed that the majority (60%) of adults using Conwy library were female; 48% aged 65 years or above and 27% “classed themselves” as having some sort of disability.

It is mainly women, older people, and people with disabilities, who are most likely to be affected by the closure.

Section 5 of this document sets out ways that we will mitigate any adverse affect on the above groups.

11. Does the geography or demography of any groups reveal anything?

Data for the ward profile for the Conwy ward (Census 2011) shows that 28.7% of those in the Conwy ward are Welsh speakers; 2.3% are unemployed with 28.8% of 16-24 yr olds claiming Unemployment Benefit (Aug 2013); 19.8% do not have a car and 36.5% have an income below the 60% GB median.

According to the *2012 Adult PLUS Survey*, of the current Conwy adult library users: only 40% live within the Conwy Ward itself; 9% live within the neighbouring, rural Caerhun Ward; the remainder were from the wider local community, including Deganwy, Llandudno Junction, Penmaenmawr, Llanfairfechan and Colwyn Bay.

As the PLUS survey was undertaken in October, it has not taken account of seasonal figures for tourists who use this library. Statistics available from the library management system have shown that there were almost 400 computer sessions annually undertaken by non users of Conwy library; most of these will be visitors from outside of Conwy County Borough.

The general demographic for the ward of Conwy shows that a small percentage of non White/Irish people live in this ward, plus a small percentage of minority religious groups. We have spoken to various members of the general public in Conwy County Borough in the *Modernising Libraries* Consultation (2011) and have targeted groups that represent people of ethnic minority origin and religions – we have received no feedback to indicate any specific adverse affect on any of these groups.

Mitigating Factors

Section 5 – above – has set out ways that we will mitigate any adverse affects that could affect any of these groups.

12. Do any rules or requirements or the way the policy or practice is delivered prevent or reduce the likelihood of any groups from use or access or are any other barriers created for them?

Eg: due to limited income, location, times of availability, access to buildings, information or language, eligibility rules, dress code, cultural issues

- Due to lack of financial resources required to invest in the building, we are unable to bring Conwy Library up the required accessibility standards for disabled people
- There are currently no parking facilities available directly for this building, and in the summer the parking can be difficult in Conwy.
- It is possible that the closure of this library could cause some customers on low incomes the additional cost of having to use public transport to access their nearest library.
- Although many older people have concessionary bus passes, some may not be able to use public transport.

Mitigating Factors

- The new Area library will be fully accessible which would improve access for people with disabilities.
- Parking for the new Area Library will be better than is currently offered at Conwy Library and will include parking spaces for disabled people.
- If we close Conwy Library (and the new Area library is not located in Conwy), we will offer Mobile library stops at suitable locations within this community, including central locations and areas of sheltered accommodation
- Current users of Conwy Library with severe mobility impairments will be identified and offered a transfer to the Home Library Service, which will visit them in their own home.

13. Can any of these limitations be justified on the grounds of advancing equality of opportunity or fostering good relations between those who share a protected characteristic and those who do not?

Yes.

- By providing a new Area library for the Conwy/ Llandudno Junction/ Deganwy area, we will be able to provide both existing and potential customers with a more consistent and better quality library experience.
- This will include access to an improved library building which is “fit for purpose”. This will provide better access for people with disabilities and has the potential to offer all those using it access to more library events and added-value services.
- If the new Area library is not based in Conwy, we will offer new Mobile library stops at targeted areas in this community where the need is greatest.
- We will be able to provide access to the Home Library Service for those with major mobility problems who cannot access their nearest library.

14. Do any of these limitations amount to unlawful discrimination?

Yes No Not Sure
(please cross as appropriate X)

If you answered Yes or Not Sure, please state on the table below, which protected group(s) it applies to and if possible explain why (including likely impact or effects of this proposed change):

Race See sections 5 and 13 above.	Black Minority Ethnic groups Gypsies / Travellers Language
Disability See sections 5 and 13 above.	Mobility Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities
Sex See sections 5 and 13 above.	Men Women
Age See sections 5 and 13 above.	Older People Children Young People
Religion & Belief See sections 5 and 13 above.	Faith communities
Sexual Orientation See sections 5 and 13 above.	Gay Lesbian Bi-sexual Heterosexual
Gender Reassignment See sections 5 and 13 above.	A person who proposes to, starts or has changed his or her gender
Marriage & Civil Partnership See sections 5 and 13 above.	
Pregnancy & Maternity See sections 5 and 13 above.	

<p>Human Rights</p> <p>See sections 5 and 13 above.</p>	<p>Right to Education, Private and Family Life, Protection of property, etc</p>
<p>Welsh Speaking Communities</p> <p>See sections 5 and 13 above.</p>	
<p>The Unemployed/ those on low incomes</p> <p>See sections 5 and 13 above.</p>	

15. If you answered No to Question 14, do the barriers and limitations amount to a differential impact for certain groups?

Yes No Not Sure
(please cross as appropriate X)

16. If you answered Yes or Not Sure to Question 15, please give details in the box below and explain why

We have had an indication of the potential impact of our proposals from the Modernising Libraries Consultation feedback in 2011. The potential for differential impact to these groups has been highlighted in sections 5 and 13 along with proposals to mitigate this impact.

17. Do you have enough information to make an informed judgement?

Yes No **(please cross as appropriate X)**

If you answered Yes, please justify:

Yes. We have had an indication of the potential impact of our proposals from the Modernising Libraries Consultation feedback in 2011, and believe we have enough information to make an informed judgement.

See also “mitigating factors” in sections 5 and 13.

If you answered No, what information do you require about protected groups?

18. Is it possible to get the information needed quickly and easily, or should data collection be included in the action plan? Please give details below:

Consultation has been carried out and we will continue to consult with users of the new Area library as part of our ongoing evaluation and monitoring procedures.

STEP 5 – Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice

In this section, you will consider whether there are any measures to reduce or remove any adverse impact. You should also explore other ways of achieving the same goal and / or alternative means of delivering a service to meet the needs of different groups.

19. What measures can you introduce to the policy or practice which could reduce or remove any unlawful impact or disadvantage?

- Establishing a new / refurbished Area library for the communities of Conwy/Llandudno Junction/ Deganwy which will be more accessible for disabled people and will offer better parking facilities than those available for users of the current Conwy Library.
- The new Area library will offer better service provision, including added value services and improved facilities, e.g. public toilets, refreshments and better seating areas.
- Give current users notice of the closing date and explain how / where similar services can be accessed within existing libraries / library provision.
- If the new Area library is not located in Conwy, we will offer targeted Mobile library stops in central areas of this community, where the need is greatest.
- Promote the Home Library Service to those with mobility impairments in this community who may be eligible to receive it.
- Promote available online resources that can be accessed from home 24/7, e.g. our E-book service and our Online Catalogue.

20. What measures could be included to strengthen the policy/practice and foster good relations and advance equality of opportunity?

- Ensuring the new Area library offers an all round better customer experience for all library service users.
- Increased partnership working with local community groups to ensure we make them aware of any new services we offer (including protected characteristic groups)
- Liaise with the local community to ensure that if the new Area library is not located in Conwy, any new Mobile library stops we introduce are at locations where they are most needed.
- Ensure marketing and promotion of the new Area Library and any new Mobile library stops, so people in this community are aware of what library services are available to them.

21. What actions could you take to achieve the same goal by an alternative means?

Invest significant capital funds into the Conwy Library building and keep the building open. However, this building/location has been assessed for suitability for an Area library and it does not meet the requirements. This option is not considered feasible: see Cabinet report 8 April 2014 - <http://modgoveng.conwy.gov.uk/ieListDocuments.aspx?CId=171&MId=3739&Ver=4>.

STEP 6 – Action Plan

Please outline below the actions you will take to progress your proposal. These might involve carrying out additional Engagement/Involvement activities, collecting Equality data where this was not readily available to help with this EIA, undertake data analysis from future data obtained to monitor the impact of this policy/practice on an ongoing basis, any actions you need to take to ensure procurement complies with the General Duty, any arrangements you need to put in place to monitor and review the impact of this policy/practice in future, and so on.

Action	Measure of Success	Timeframe	Lead Responsibility	Add to Service Plan (✓)
Actions to be taken before EIA and policy/practice can be signed off				
Submit committee reports on a preferred location for the area library and to gain approval for a phased programme of closure.	Report to Joint Customers and Communities Scrutiny Committee and Cabinet	Scrutiny Committee: 28 August 2014 and Cabinet: 9 September 2014	Head of Community Development Service: Marianne Jackson	
Actions after EIA and policy/practice signed off				
Apply for funding for new area library	Funding package in place	September 2014-June	Section Head: Culture and	

		2015	Information	
Agree a date for the opening of the new Area Library for Deganwy/ Llandudno Junction /Conwy	Date agreed	Date tbc	Head of Community Development Service: Marianne Jackson	
Timescales for closing the current Conwy library building to be agreed	Library to be closed	Date tbc	Head of Community Development Service: Marianne Jackson	
Action plan to relocate the library service to be put in place	Action plan in place	Date tbc	Section Head: Culture and Information	
Identify locations in Conwy town where additional Mobile Library stops can be provided, if the Area Library is not located in Conwy town.	New Mobile timetable to be in place once library closed	December 2014	Library Service Manager: Reading and Inclusion	
Identify any current customers who may be eligible for the Home Library Service	Transfer to Home Library Service	September 2014	Library Service Manager: Literacy and Learning	
Inform customers of this date as soon as possible and ensure that they are kept informed	Posters and press releases	Date tbc	Section Head: Culture and Information	
Promotion of new Mobile library stops within Conwy town if Area library is not located in Conwy town.	Start to look at possible new Mobile stops August 2014	A month before the new timetable is ready	Library Service Manager / Senior Library Assistant, Mobile Library	
Opening/ Launch of the new Area library	Area library open	Date tbc	Head of Community Development Service: Marianne Jackson	
Promotion of services and activities at the new Area library to the local community including the Black, Asian and ethnic minority communities.	Action plan to network and market services to local community,	Date tbc and ongoing	Library Managers/ Librarian - Conwy	

	including the Conwy area			
Librarian at the new area library to do outreach sessions, including groups working in the community, including Conwy area.	Librarian at Conwy library/ staff at Conwy library to work with groups in the local area.	Ongoing	Librarian - Conwy	
Ongoing monitoring and evaluation of any new services, especially in terms of Equalities Data, e.g. PLUS Survey data.	As part of our usual monitoring and evaluation procedures	Ongoing monitoring and evaluation of any new services, especially in terms of Equalities Data, e.g. PLUS Survey data.	Library Managers/ Librarian - Conwy	

STEP 7 – Decision To Proceed

22. Using the information you have gathered in steps 1 – 5 above, please state on the table below whether you are able to proceed with the policy or practice and if so, on what basis?

(please cross as appropriate X)

Decision		Action
<input type="checkbox"/>	Continue with policy or practice in its current form	Complete the Monitoring and Review section (Step 8) to ensure the outcomes are monitored and regularly reviewed
<input type="checkbox"/>	Continue with policy or practice but with amendments for improvement	Complete Action Plan and Monitor and Review sections (Steps 6 & 8) to continually assess impact
<input checked="" type="checkbox"/>	Continue with policy or practice but with amendments to remove any areas of adverse impact as identified in Step 5	Complete Action Plan (Step 6) to address any areas of adverse impact and Monitor and Review (Section 8) to continually assess impact
<input type="checkbox"/>	Abandon this policy or practice as it is not possible to address the adverse impact, and consider alternative ways of addressing the issues	Complete Action Plan to address any issues resulting from abandoning policy and to deal with the adverse impact identified

STEP 8 – Arrangements for Monitoring Outcomes and Reviewing Data

The EIA process is an ongoing one that doesn't end when the policy/practice and EIA is agreed and implemented. There is a specific legal duty to monitor the impact of policies/practices on equality on an ongoing basis to identify if the outcomes have changed since you introduced this new policy or practice.

23. Please outline below what arrangements you will make to monitor and review the ongoing impact of this policy or practice:

Monitoring and Review arrangements (including where outcomes will be recorded)	Timeframe & Frequency	Lead Responsibility	Add to Service Plan (✓)
Area Library Operational Plan including: <ul style="list-style-type: none"> ○ Review postcode data of area library users from this community ○ Analyse equalities data from the PLUS Survey of users at the new Area library ○ Monitor usage statistics from the new Area library and the Mobile Library 	Annual	Librarian/ Service Manager	

STEP 9 – Publishing the Equality Impact Assessment

Please arrange for this completed EIA to be agreed by your Head of Service, refer to the EIA Policy regarding publishing arrangements and return a copy to the HR and Equality Officer.