



**Keep Sustainability Plan
Reduction of opening hours**

Equality Impact Assessment

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| Name of the proposal, project or service |
| Proposed reduction to The Keep opening hours |

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|----------------|---------------|--------------|------------|
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Part 1 – The Public Sector Equality Duty and Equality Impact Assessments (EIA)

1.1 The Council must have due regard to its Public Sector Equality Duty when making all decisions at member and officer level. An EIA is the best method by which the Council can determine the impact of a proposal on equalities, particularly for major decisions. However, the level of analysis should be proportionate to the relevance of the duty to the service or decision.

1.2 This is one of two forms that the County Council uses for Equality Impact Assessments, both of which are available on the intranet. This form is designed for any proposal, project or service. The other form looks at services or projects.

1.3 The Public Sector Equality Duty (PSED)

The public sector duty is set out at Section 149 of the Equality Act 2010. It requires the Council, when exercising its functions, to have “due regard” to the need to

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the Act.
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it. (see below for “protected characteristics”

These are sometimes called equality aims.

1.4 A “protected characteristic” is defined in the Act as:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race (including ethnic or national origins, colour or nationality)
- religion or belief;
- sex;
- sexual orientation.

Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination.

The previous public sector equalities duties only covered race, disability and gender.

1.5 East Sussex County Council also considers the following additional groups/factors when carry out analysis:

- Carers – A carer spends a significant proportion of their life providing unpaid support to family or potentially friends. This could be caring for a relative, partner or friend who is ill, frail, disabled or has mental health or substance misuse problems. [Carers at the Heart of 21stCentury Families and Communities, 2008]
- Literacy/Numeracy Skills

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- Part time workers
- Rurality

1.6 Advancing equality (the second of the equality aims) involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristic
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people including steps to take account of disabled people's disabilities
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

NB Please note that, for disabled persons, the Council must have regard to the possible need for steps that amount to positive discrimination, to "level the playing field" with non-disabled persons, e.g. in accessing services through dedicated car parking spaces.

1.6 Guidance on Compliance with The Public Sector Equality Duty (PSED) for officers and decision makers:

1.6.1 To comply with the duty, the Council must have "due regard" to the three equality aims set out above. This means the PSED must be considered as a factor to consider alongside other relevant factors such as budgetary, economic and practical factors.

1.6.2 What regard is "due" in any given case will depend on the circumstances. A proposal which, if implemented, would have particularly negative or widespread effects on (say) women, or the elderly, or people of a particular ethnic group would require officers and members to give considerable regard to the equalities aims. A proposal which had limited differential or discriminatory effect will probably require less regard.

1.6.3 *Some key points to note :*

- The duty is regarded by the Courts as being very important.
- Officers and members must be aware of the duty and give it conscious consideration: e.g. by considering open-mindedly the EIA and its findings when making a decision. When members are taking a decision, this duty can't be delegated by the members, e.g. to an officer.
- EIAs must be evidence based.
- There must be an assessment of the practical impact of decisions on equalities, measures to avoid or mitigate negative impact and their effectiveness.
- There must be compliance with the duty when proposals are being formulated by officers and by members in taking decisions: the Council can't rely on an EIA produced after the decision is made.
- The duty is ongoing: EIA's should be developed over time and there should be evidence of monitoring impact after the decision.
- The duty is not, however, to achieve the three equality aims but to consider them – the duty does not stop tough decisions sometimes being made.

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- The decision maker may take into account other countervailing (i.e. opposing) factors that may objectively justify taking a decision which has negative impact on equalities (for instance, cost factors)

1.6.4 In addition to the Act, the Council is required to comply with any statutory Code of Practice issued by the Equality and Human Rights Commission. New Codes of Practice under the new Act have yet to be published. However, Codes of Practice issued under the previous legislation remain relevant and the Equality and Human Rights Commission has also published guidance on the new public sector equality duty.

Part 2 – Aims and implementation of the proposal, project or service

2.1 What is being assessed?

a) Proposal or name of the project or service.

The proposed reduction to The Keep public opening hours

b) What is the main purpose or aims of proposal, project or service?

The purpose of the proposal is to ensure the medium-term financial sustainability of The Keep in light of the financial pressures facing partners.

The proposal aims to reduce running costs by reducing public opening hours whilst ensuring continued public access to the collections held at the archive centre, in line with our statutory responsibility. The Keep is currently open to the public five days per week for a total of 36 hours. By shortening opening hours each day, it would be possible to continue to provide access to The Keep five days per week. Overall it is proposed that opening hours are reduced by 12 hours (33%), as detailed below:

| | Current | Proposed |
|------------------|---------------|---------------|
| Monday | <i>Closed</i> | <i>Closed</i> |
| Tuesday | 9.30am – 5pm | 10am – 4pm |
| Wednesday | 10am – 5pm | 10am – 4pm |
| Thursday | 9.30am – 5pm | 10am – 1pm |
| Friday | 9.30am – 5pm | 10am – 4pm |
| Saturday | 9.30am – 4pm | 10am – 1pm |
| Sunday | <i>Closed</i> | <i>Closed</i> |
| Total | 36 hours p/w | 24 hours p/w |

Opening hours of Accredited Archive Services (AAS) vary considerably across the country. An analysis of the average weekly opening hours of many AAS shows that most are open for an average of 30 – 40 hours per week. The proposed 24 hours

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per week of public opening time at The Keep would, however, be more than the average weekly opening hours of the Shropshire Archives, Denbighshire Archive Service, Warwickshire County Record Office, Bolton Archives and Local Studies Service, and the Cumbria County Council Record Office. The Northumberland Archives are currently open 24 hours per week on average. For comparison the West Sussex Record Office is open for 36.25 hours per week, the Surrey History Centre for 36.75 hours per week and the Kent History and Library Centre for 40 hours per week.

c) Manager(s) and section or service responsible for completing the assessment

Jack Pierce, Principal Customer Services Officer, Communities, Economy and Transport Department

2.2 Who is affected by the proposal, project or service? Who is it intended to benefit and how?

The Keep is an archive centre that offers free access to anyone wishing to make use of it. The proposed reduction in opening hours has the potential to affect anyone who chooses to visit The Keep.

In 2019, there were 6,638 visits to The Keep by members of the public to view items from the collections. Due to the impact upon typical visits to The Keep because of the Covid-19 pandemic, we have not revised this statistic from a more recent period.

The Keep partnership also open the facility for pre-booked events including talks and workshops. These pre-booked events could continue outside of public opening hours and so would not be affected by the proposed changes to public opening hours.

2.3 How is, or will, the proposal, project or service be put into practice and who is, or will be, responsible for it?

Public consultation on the proposals was held from 14 September to 25 October 2020. The results of the consultation have informed this EqIA.

Subject to the review of the consultation feedback and approval by all three partners, the new opening hours would be introduced from April 2021.

The members of The Keep Board will be jointly responsible for the proposed changes to opening hours, with the implementation led by the Team Manager, Archive Services and The Keep.

2.4 Are there any partners involved? E.g. NHS Trust, voluntary/community organisations, the private sector? If yes, how are partners involved?

The Keep partnership consists of East Sussex County Council, Brighton and Hove City Council and the University of Sussex who work collaboratively to collect and maintain archives and provide public access to archives in their collections.

The Keep Management Team and The Keep Board is comprised of representatives of the three partner organisations.

Sussex Family History Group and University of Sussex lease rooms on site. The use of these rooms would not be affected by the changes to public opening hours; the

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building will remain open to volunteers, lease holders and staff six days/week with staff on site from 8am to 6pm.

2.5 Is this proposal, project or service affected by legislation, legislative change, service review or strategic planning activity?

There is a range of legal obligations and constraints which the authorities have inherited by virtue of the nomination of The Keep as a Local Place of Deposit by the National Archives, through its appointment as a Diocesan Record Office by the Diocesan bishop and as a manorial repository by the Master of the Rolls. In addition, ESRO fulfils the legal duties of ESCC, as well as BHCC and constituent district and parish councils who have chosen to discharge their duties to hold local government records relating to East Sussex and Brighton and Hove.

The public consultation and final EqIA have been undertaken before The Board consider approving any changes to opening hours. This will ensure that a clear evidence base is provided, our statutory responsibilities are adhered to and that we continue to offer reasonable public access to records.

2.6 How do people access or how are people referred to your proposal, project or service? Please explain fully.

The Keep is a public facility open to any member of the public wishing to make use of it.

2.7 If there is a referral method how are people assessed to use the proposal, project or service? Please explain fully.

N/A

2.8 How, when and where is your proposal, project or service provided? Please explain fully.

Please refer to the table in 2.1b) above which shows the current and proposed public opening hours for The Keep. The location and all other aspects of the service will remain unchanged.

Part 3 – Methodology, consultation, data and research used to determine impact on protected characteristics.

3.1 List all examples of quantitative and qualitative data or any consultation information available that will enable the impact assessment to be undertaken.

| Types of evidence identified as relevant have X marked against them | | | |
|--|----------------------------|----------|---|
| | Employee Monitoring Data | | Staff Surveys |
| X | Service User Data | | Contract/Supplier Monitoring Data |
| X | Recent Local Consultations | | Data from other agencies, e.g. Police, Health, Fire and Rescue Services, third sector |
| | Complaints | | Risk Assessments |
| X | Service User Surveys | X | Research Findings |

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|----------|---|---|--------------------------|
| X | Census Data | X | East Sussex Demographics |
| | Previous Equality Impact Assessments | | National Reports |
| | Other organisations Equality Impact Assessments | | Any other evidence? |

3.2 Evidence of complaints against the proposal, project or service on grounds of discrimination.

This is the final revised and updated EqIA following the recent public consultation regarding these proposals. No complaints on grounds of discrimination have been received to date on our proposals, or previously regarding opening hours at The Keep.

3.3 If you carried out any consultation or research on the proposal, project or service explain what consultation has been carried out.

In advance of the public consultation, the partnership collected data during the second half of 2019 in relation to the nature of customers' visits to The Keep via a customer survey. This survey data gave the project team and the Board an understanding of the likely impact on customers of a reduction in opening hours and enabled consideration of any potential mitigation that may be required, prior to an opening hours proposal being put to public consultation.

In addition, staff completed a desk survey during the same period to provide insight into the nature of interactions between staff and users during a typical week. The analysis of both of these surveys assisted the formation of the proposal which the Board agreed could be put to public consultation.

The proposals were subject to public consultation from 14 September to 25 October 2020. During the consultation period, 277 customers provided their feedback.

The public consultation questionnaire was designed to inform understanding of who our customers are, the timing, frequency and duration of their visits and what activities and tasks they are predominantly completing when visiting The Keep, as well as whether the proposed change to opening hours would impact on their ability to visit The Keep.

3.4 What does the consultation, research and/or data indicate about the positive or negative impact of the proposal, project or service?

The results of the consultation survey will inform the Board's decision regarding an alteration to opening hours. Following analysis of both the customer survey during 2019 and the feedback provided during the public consultation, it is not anticipated that the reduction in opening hours will have a disproportionately negative impact on any of the existing users as access to The Keep five days per week will be maintained. Customers will also still be able to access a range of materials via [The Keep's website](#) and the partnership is committed to the development and improvement of The Keep's digital offer.

Part 4 – Assessment of impact

4.1 Age: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic reflected in the County/District/Borough?

| Protected characteristic | | East Sussex | Eastbourne | Hastings | Lewes | Rother | Wealden | Brighton & Hove |
|--------------------------|------------------------------|-------------|------------|----------|---------|--------|---------|-----------------|
| Total | Total population, 2018 | 554,590 | 103,160 | 92,855 | 102,744 | 95,656 | 160,175 | 290,395 |
| Age | Population, 0-15 (%) - 2018 | 17.1 | 17.3 | 18.6 | 17.3 | 14.9 | 17.1 | 15.6 |
| | Population, 16-64 (%) - 2018 | 57.3 | 57.8 | 61.7 | 57.1 | 53.2 | 56.9 | 71.1 |
| | Population, 65+ (%) - 2018 | 25.7 | 24.9 | 19.8 | 25.5 | 31.9 | 25.9 | 13.3 |

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

| Age | Number of respondents | Percentage |
|-------------------|-----------------------|-------------|
| Under 18 | 0 | 0% |
| 18 – 24 | 0 | 0% |
| 25 – 34 | 12 | 4.33% |
| 35 – 44 | 20 | 7.22% |
| 45 – 54 | 30 | 10.83% |
| 55 – 64 | 82 | 29.60% |
| 65-74 | 95 | 34.30% |
| 75+ | 25 | 9.03% |
| Prefer not to say | 4 | 1.44% |
| No answer | 29 | 3.25% |
| Total | 277 | 100% |

Respondents to the opening hours consultation from 14 September to 25 October 2020.

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

The results of our surveys show that of customers to The Keep are aged 65 and over (43.3%) in addition to the 29.6% of consultees who stated they were between 55 and 64 years old. These groups therefore have the potential to be more affected by the proposals than those in the general population. However, people aged 55 and older are more likely to be retired and therefore have the flexibility to travel at alternative times of the day, within the proposed new opening hours. In response to the question about employment status, 47.3% of consultees indicated that they consider themselves to be retired whether receiving a pension or not.

d) What is the proposal, project or service's impact on different ages/age groups?

The impact of the proposals on different age groups is largely dependent on the flexibility they have to travel at different times of the day. Retired people are likely to have greater flexibility as to the time of day they visit The Keep.

The times of day of customer interactions with staff and duration of visits of existing users of The Keep have been analysed and this has been considered in the proposed, reduced opening hours, to enable people to continue to access the centre when it is most convenient for the majority of users.

People aged under 65 are more likely to work full time and therefore access The Keep on Saturdays. This age group could therefore be more impacted by the proposed closure on Saturday afternoons. However, our survey data shows that Saturdays are currently the least popular day with on average only 16 visitors per day, compared to between 27 and 35 on other days.

e) What actions are to/or will be taken to avoid any negative impact or to better advance equality?

For the protected characteristic of age, we have identified that people aged under 65 in full time employment have the potential to be more impacted by the changes than those who have the flexibility to travel at different times of the day. It is proposed to continue to provide public access to The Keep on Saturday mornings to provide a range of times and days that visitors can engage with services on site.

f) Provide details of the mitigation

The Keep will continue to be open to the public five days per week, including Saturday mornings.

In addition, [The Keep's website](#) enables customers to plan their visit to The Keep in advance as well as access some services without the need to visit The Keep building. The website is available 24 hours per day from anywhere with an internet connection. Customers can browse the catalogue, order digital or print copies and purchase research services, view the events programme and book and pay for tickets for events. 92% of consultees have internet access on a device that they own (laptop/PC, mobile phone or tablet).

Customers can register online rather than coming into the centre. This allows them to order documents they source on the catalogue (which they can then view at The Keep in hard copy), create wish-lists and save their searches for use another time.

Support is available if customers need help using the website. "Welcome Wednesday" sessions are run once a month which are supported by volunteers and help new users get to know the set up and collections and these will re-start when Covid-related restrictions permit. [How-to notes are available on the website](#), and in paper form at The Keep. These will be improved to make them more user-friendly and in plain English. Volunteer computer buddies will be recruited to support customers with low IT levels when Covid-related restrictions permit.

g) How will any mitigation measures be monitored?

We will continue to record visitor numbers at The Keep to monitor whether they are affected by the changes.

We will continue to record visits to our website, to monitor whether they increase following the reduction in opening hours.

Customer feedback will continue to be monitored to inform future improvements to the website and on-site services.

4.2 Disability: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic reflected in the County /District/Borough?

| Protected characteristic | | East Sussex | Eastbourne | Hastings | Lewes | Rother | Wealden | Brighton & Hove |
|--------------------------|----------------------------------|-------------|------------|----------|---------|--------|---------|-----------------|
| Total | Total population, 2018 | 554,590 | 103,160 | 92,855 | 102,744 | 95,656 | 160,175 | 290,395 |
| Disability | Limiting long-term illness, 2011 | 107,145 | 20,831 | 19,956 | 19,054 | 21,242 | 26,062 | 44,569 |
| | Projected LLTI 2017 | 114,741 | 22,407 | 20,822 | 20,400 | 21,744 | 29,367 | N/A |
| | Projected disability, 2017 | 98,608 | 19,414 | 17,419 | 17,578 | 18,904 | 25,293 | N/A |

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

| Disability | Number of respondents | Percentage |
|-----------------------------|-----------------------|-------------|
| Yes | 36 | 13.00% |
| No | 219 | 79.06% |
| Prefer not to say/no answer | 22 | 7.94% |
| Total | 277 | 100% |

Respondents to the opening hours consultation from 14 September to 25 October 2020

Type of disability recorded by respondents to the public consultation 2020

| | Number of respondents | Percentage |
|---|-----------------------|------------|
| Physical impairment | 17 | 29.31% |
| Sensory impairment | 5 | 8.62% |
| Long standing illness or health condition | 18 | 31.03% |
| Mental health condition | 8 | 13.79% |
| Learning disability | 5 | 8.62% |
| Prefer not to say/other/no answer | 4 | 6.90% |

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| Other | 1 | 1.73% |
| Total | 58 | 100% |

Respondents to the opening hours consultation from 14 September to 25 October 2020

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

The data from the public consultation shows that 13% of respondents consider themselves to have a disability.

The proposed reduced opening hours have the potential to negatively impact those people with certain disabilities who as a result of those disabilities have to rely on a personal helper who is not available within the proposed reduced opening hours.

d) What is the proposal, project or service's impact on people who have a disability?

The proposed changes have been developed to minimise the impact for current visitors to The Keep. This has been done by opening only 30 minutes later on three days and closing only one hour earlier, with the exception of Thursday and Saturday afternoons when the building would be closed from 1pm. Please refer to the table of current and proposed opening hours in 2.1 b).

Where consultees stated they would not be able to visit the Keep within the proposed public opening hours, they were asked to give reasons. Within these responses there was not any specific or direct reference to a user's disability.

In view of consultation feedback and as a result of the way the proposed reduction in hours is spread across five days, it is not anticipated that the proposed reduction would disproportionately negatively impact disabled customers.

However, any disabled customers who are unable to visit The Keep in the reduced opening hours due to the unavailability of their personal helper or accessible transport may be more reliant on the website, research and reprographics services, or be able to visit The Keep less frequently.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

A project to improve the accessibility of the website was completed in September 2020 and accessibility standards are adhered to in all correspondence and online messaging.

f) Provide details of any mitigation.

The Keep will continue to be open to the public five days per week, including Saturday mornings and additional support is available for disabled customers, including an accessible building and dedicated car parking spaces.

In addition, customers can access [The Keep website](#). The accessibility of the website was improved in September 2020. Content is available in a format

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that users can recognise and use with the senses that are available to them and is compatible with technologies to assist accessibility such as screen readers to increase font size.

Disabled access to the building and the range of support available is advertised on The Keep website to help customers to plan their visit in advance.

The website enables customers to plan their visit to The Keep in advance as well as access some services without the need to visit The Keep building. Customers can browse the catalogue, find out general information about the collections and services, view the events programme and book and pay for tickets for events.

Customers can register online rather than coming into the centre. This allows them to order documents they source on the catalogue (which they can then view at The Keep in hard copy), create wish-lists and save their searches for use another time.

Support is available if customers need help using the website. “Welcome Wednesday” sessions are run once a month which are supported by volunteers and help new users get to know the set up and collections and these will re-start when Covid-related restrictions permit. [How-to notes are available on the website](#), and in paper form at The Keep. These will be improved to make them more user-friendly and in plain English. Volunteer computer buddies will be recruited to support customers with low IT levels when Covid-related restrictions permit.

g) How will any mitigation measures be monitored?

Staff will continue to monitor feedback regarding The Keep building and website and make adjustments where appropriate.

4.3 Ethnicity: Testing of disproportionate, negative, neutral or positive impact. Race categories are: Colour. E.g. being black or white, Nationality e.g. being a British, Australian or Swiss citizen, Ethnic or national origins e.g. being from a Roma background or of Chinese Heritage

a) How is this protected characteristic reflected in the County /District/Borough?

| Protected characteristic | | East Sussex | Eastbourne | Hastings | Lewes | Rother | Wealden | Brighton & Hove |
|--------------------------|--|-------------|------------|----------|-------|--------|---------|-----------------|
| Race | White British (%) – 2011 | 91.7 | 87.4 | 89.3 | 92.5 | 94.1 | 93.8 | 80.5 |
| | Black and Minority Ethnic group (BME) (%) – 2011 | 8.3 | 12.6 | 10.7 | 7.5 | 5.9 | 6.2 | 19.5 |

Source: Census, 2011. Aggregated data

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

| | Number of respondents | Percentage |
|--|-----------------------|------------|
|--|-----------------------|------------|

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|------------------------------------|------------|-------------|
| White British | 222 | 80.14% |
| White Irish | 6 | 2.17% |
| White Gypsy/Roma | 0 | 0.0 |
| White Irish Traveller | 0 | 0.0 |
| White other | 9 | 3.25% |
| Mixed white and Black Caribbean | 0 | 0.0 |
| Mixed white and Black African | 0 | 0.0 |
| Mixed white and Asian | 0 | 0.0 |
| Mixed other | 1 | 0.36% |
| Asian or Asian British Indian | 0 | 0.0 |
| Asian or Asian British Pakistani | 0 | 0.0 |
| Asian or Asian British Bangladeshi | 0 | 0.0 |
| Asian or Asian British other | 0 | 0.0 |
| Black or Black British Caribbean | 0 | 0.0 |
| Black or Black British African | 1 | 0.36% |
| Black or Black British other | 0 | 0.0 |
| Arab | 0 | 0.0 |
| Chinese | 0 | 0.0 |
| Prefer not to say | 20 | 7.22% |
| Other ethnic group | 4 | 1.44% |
| No answer | 14 | 5.05% |
| Total | 277 | 100% |

Respondents to the opening hours consultation from 14 September to 25 October 2020

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

Over 80% of respondents to the customer survey identified as White British and therefore have the potential to be more affected by the reduction in opening hours than those of other ethnicities. The greater impact on the White British group is considered to be a reflection of the general population of users of The Keep rather than any indication of disproportionate impact related to ethnicity.

d) What is the proposal, project or service's impact on those who are from different ethnic backgrounds?

At this stage, there is not considered to be an impact for users of The Keep of the proposed changes to opening hours based on ethnicity.

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e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

No specific actions are proposed, other than the general mitigations to reduce negative impact.

f) Provide details of any mitigation.

The general approach to avoid or reduce negative impact is to continue to open five days per week.

In addition, [The Keep website](#) enables customers to plan their visit to The Keep in advance as well as access some services without the need to visit The Keep building. The website is available 24 hours per day from anywhere with an internet connection. Customers can browse the catalogue, find out general information about the collections and services, view the events programme and book and pay for tickets for events.

Customers can register as a Reader (get an account/become a member) online rather than coming into the centre. This allows them to order documents they source on the catalogue (which they can then view at The Keep in hard copy), create wish-lists and save their searches for use another time.

Support is available if customers need help using the website. “Welcome Wednesday” sessions are run once a month which are supported by volunteers and help new users get to know the set up and collections and these will re-start when Covid-related restrictions permit. [How-to notes are available on the website](#), and in paper form at The Keep. These will be improved to make them more user-friendly and in plain English. Volunteer computer buddies will be recruited to support customers with low IT levels when Covid-related restrictions permit.

g) How will any mitigation measures be monitored?

No specific actions are proposed however we will continue to monitor customer feedback to ensure that the changes do not impact customers based on ethnicity.

4.4 Gender/Transgender: Testing of disproportionate, negative, neutral or positive impact

a) How is this protected characteristic target group reflected in the County/District/Borough?

| Protected characteristic | | East Sussex | Eastbourne | Hastings | Lewes | Rother | Wealden | Brighton & Hove |
|--------------------------|-------------------|-------------|------------|----------|-------|--------|---------|-----------------|
| Sex | Male (%) - 2018 | 48.5 | 48.5 | 48.9 | 48.6 | 48.2 | 48.2 | 50.2 |
| | Female (%) - 2018 | 51.5 | 51.5 | 51.1 | 51.4 | 51.8 | 51.8 | 49.8 |

Source: ESIF, 2018. N.B.: Gender reassignment data is not available.

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

| Gender | Number of respondents | Percentage |
|-------------------|-----------------------|-------------|
| Male | 101 | 36.46% |
| Female | 159 | 57.40% |
| Prefer not to say | 7 | 2.53% |
| No answer | 10 | 3.61% |
| Total | 277 | 100% |

Respondents to the opening hours consultation from 14 September to 25 October 2020

c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

The majority (57.4%) of respondents to the customer survey were female and therefore have the potential to be more impacted by the proposed changes than male visitors to The Keep. However at this stage there is not considered to be an impact based on gender.

d) What is the proposal, project or service’s impact on different genders?

At this stage, there is not considered to be an impact for users of The Keep of the proposed changes to opening hours based on gender as the changes would affect all current and potential users regardless of gender.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

No specific actions are proposed, other than the general mitigations to reduce negative impact.

f) Provide details of any mitigation.

The general approach to avoid or reduce negative impact is to continue to open five days per week.

In addition, [The Keep website](#) enables customers to plan their visit to The Keep in advance as well as access some services without the need to visit The Keep building. The website is available 24hrs per day from anywhere with an internet connection. Customers can browse the catalogue, find out general information about the collections and services, view the events programme and book and pay for tickets for events.

Customers can register as a Reader (get an account/become a member) online rather than coming into the centre. This allows them to order documents they source on the catalogue (which they can then view at The Keep in hard copy), create wish-lists and save their searches for use another time.

Support is available if customers need help using the website. “Welcome Wednesday” sessions are run once a month which are supported by volunteers and help new users get to know the set up and collections and these will re-start when Covid-related restrictions permit. [How-to notes are](#)

[available on the website](#), and in paper form at The Keep. These will be improved to make them more user-friendly and in plain English. Volunteer computer buddies will be recruited to support customers with low IT levels.

g) How will any mitigation measures be monitored?

No specific actions are proposed however we will continue to monitor customer feedback to ensure that the changes do not disproportionately impact customers based on gender.

4.5 Marital Status/Civil Partnership: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic target group reflected in the County/District/Borough?

| Protected characteristic | | East Sussex | Eastbourne | Hastings | Lewes | Rother | Wealden | Brighton & Hove |
|------------------------------------|---|-------------|------------|----------|-------|--------|---------|-----------------|
| Marital & Civil Partnership status | Single (never married or never registered a same-sex civil partnership) (%) - 2011 | 29.1 | 33.3 | 36.5 | 28.7 | 24.7 | 24.9 | 50.1 |
| | Married (%) - 2011 | 48.4 | 42.8 | 39.2 | 49.6 | 51.3 | 55.1 | 31.8 |
| | In a registered same-sex civil partnership (%) – 2011 | 0.3 | 0.4 | 0.3 | 0.5 | 0.3 | 0.2 | 1.0 |
| | Separated (but still legally married or still legally in a same-sex civil partnership) (%) – 2011 | 2.7 | 3 | 3.7 | 2.5 | 2.6 | 2.3 | 2.5 |
| | Divorced or formerly in a same-sex civil partnership which is now legally dissolved (%) – 2011 | 10.7 | 11.5 | 12.8 | 10.2 | 10.3 | 9.4 | 9.1 |
| | Widowed or surviving partner from a same-sex civil partnership (%) - 2011 | 8.7 | 9.1 | 7.4 | 8.4 | 10.8 | 8.2 | 5.5 |

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

| | Number of respondents | Percentage |
|-------------------|-----------------------|-------------|
| Yes | 165 | 59.57% |
| No | 57 | 20.58% |
| Prefer not to say | 33 | 11.91% |
| No answer | 22 | 7.94% |
| Total | 277 | 100% |

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c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

At this stage, there is not considered to be an impact for users of The Keep of the proposed changes to opening hours based on their marital status.

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- d) **What is the proposal, project or service’s impact on people who are married or same sex couples who have celebrated a civil partnership?**

As above.

- e) **What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

No specific actions are proposed, other than the general mitigations to reduce negative impact.

- f) **Provide details of any mitigation.**

The general approach to avoid or reduce negative impact is to continue to open five days per week.

In addition, [The Keep website](#) enables customers to plan their visit to The Keep in advance as well as access some services without the need to visit The Keep building. The website is available 24hrs per day from anywhere with an internet connection. Customers can browse the catalogue, find out general information about the collections and services, view the events programme and book and pay for tickets for events.

Customers can register as a Reader (get an account/become a member) online rather than coming into the centre. This allows them to order documents they source on the catalogue (which they can then view at The Keep in hard copy), create wish-lists and save their searches for use another time.

Support is available if customers need help using the website. “Welcome Wednesday” sessions are run once a month which are supported by volunteers and help new users get to know the set up and collections and these will re-start when Covid-related restrictions permit. [How-to notes are available on the website](#), and in paper form at The Keep. These will be improved to make them more user-friendly and in plain English. Volunteer computer buddies will be recruited to support customers with low IT levels when Covid-related restrictions permit.

- g) **How will any mitigation measures be monitored?**

No specific actions are proposed however we will continue to monitor customer feedback to ensure that the changes do not disproportionately impact customers based on marital status.

4.6 or **Pregnancy and maternity: Testing of disproportionate, negative, neutral positive impact.**

- a) **How is this protected characteristic target group reflected in the County/District/Borough?**

| Protected characteristic | East Sussex | Eastbourne | Hastings | Lewes | Rother | Wealden | Brighton & Hove |
|--------------------------|-------------|------------|----------|-------|--------|---------|-----------------|
| | | | | | | | |

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| | | | | | | | | |
|-----------------------|--|-------|------|-------|------|------|-------|-------|
| Pregnancy & maternity | Live births (2018) | 4,941 | 981 | 1,069 | 877 | 700 | 1,314 | 2,521 |
| | Births per 1,000 females (2018) | 8.9 | 9.5 | 11.5 | 8.5 | 7.3 | 8.2 | 8.7 |
| | Live births by mother's country of birth - UK (%) (2018) | 85.3 | 75.1 | 84.8 | 85.6 | 91.0 | 90.0 | 71.1 |
| | Teenage pregnancy, rate per 1,000 females (2017) | 15.9 | 13.4 | 30 | 16.4 | 18.1 | 7.5 | 19.3 |

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

| | Number of respondents | Percentage |
|-------------------|-----------------------|-------------|
| Yes | 1 | 0.36% |
| No | 190 | 68.59% |
| Prefer not to say | 25 | 9.03% |
| No answer | 61 | 22.02% |
| | 277 | 100% |

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c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

At this stage, there is not considered to be an impact for users of The Keep of the proposed changes to opening hours based on this protected characteristic.

d) What is the proposal, project or service's impact on pregnant women and women within the first 26 weeks of maternity leave?

As above.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

No specific actions are proposed, other than the general mitigations to reduce negative impact.

f) Provide details of the mitigation

The general approach to avoid or reduce negative impact is to continue to open five days per week.

In addition, [The Keep website](#) enables customers to plan their visit to The Keep in advance as well as access some services without the need to visit The Keep building. The website is available 24hrs per day from anywhere with an internet connection. Customers can browse the catalogue, find out general information about the collections and services, view the events programme and book and pay for tickets for events.

Customers can register as a Reader (get an account/become a member) online rather than coming into the centre. This allows them to order documents they source on the catalogue (which they can then view at The

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Keep in hard copy), create wish-lists and save their searches for use another time.

Support is available if customers need help using the website. “Welcome Wednesday” sessions are run once a month which are supported by volunteers and help new users get to know the set up and collections and these will re-start when Covid-related restrictions permit. [How-to notes are available on the website](#), and in paper form at The Keep. These will be improved to make them more user-friendly and in plain English. Volunteer computer buddies will be recruited to support customers with low IT levels when Covid-related restrictions permit.

g) How will any mitigation measures be monitored?

No specific actions are proposed however we will continue to monitor customer feedback to ensure that the changes do not disproportionately impact pregnant women and women within the first 26 weeks of maternity leave.

4.7 Religion, Belief: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic reflected in the County/District/Borough?

| Protected characteristic | | East Sussex | Eastbourne | Hastings | Lewes | Rother | Wealden | Brighton & Hove |
|--------------------------|--------------------------------|-------------|------------|----------|-------|--------|---------|-----------------|
| Religion | Christian (%) – 2011 | 59.9 | 59.6 | 51.9 | 57 | 64.8 | 64 | 42.9 |
| | No religion (%) – 2011 | 29.6 | 29.2 | 36.6 | 32.5 | 25.2 | 26.3 | 42.4 |
| | Religion not stated (%) - 2011 | 8.1 | 8 | 8.3 | 8.2 | 8.2 | 7.9 | 8.8 |
| | Muslim (%) – 2011 | 0.8 | 1.5 | 1.3 | 0.6 | 0.5 | 0.4 | 2.2 |
| | Other religion (%) – 2011 | 0.7 | 0.6 | 0.7 | 0.6 | 0.6 | 0.8 | 0.8 |
| | Buddhist (%) – 2011 | 0.4 | 0.5 | 0.5 | 0.5 | 0.3 | 0.3 | 1.0 |
| | Hindu (%) – 2011 | 0.3 | 0.4 | 0.5 | 0.3 | 0.2 | 0.1 | 0.7 |
| | Jewish (%) – 2011 | 0.2 | 0.2 | 0.2 | 0.3 | 0.2 | 0.2 | 1.0 |
| | Sikh (%) – 2011 | 0 | 0.1 | 0 | 0 | 0 | 0 | 0.1 |

Source: Census 2011

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

| | Number of respondents | Percentage |
|--------------|-----------------------|-------------|
| Christian | 88 | 88.89% |
| Buddhist | 1 | 1.01% |
| Hindu | 0 | 0.0 |
| Jewish | 1 | 1.01% |
| Muslim | 1 | 1.01% |
| Sikh | 0 | 0.0 |
| Other | 8 | 8.08% |
| Total | 99 | 100% |

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- c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?**

At this stage, there is not considered to be an impact for users of The Keep of the proposed changes to opening hours based on religion.

- d) What is the proposal, project or service's impact on the people with different religions and beliefs?**

As above.

- e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?**

No specific actions are proposed, other than the general mitigations to reduce negative impact.

- f) Provide details of any mitigation.**

The general approach to avoid or reduce negative impact is to continue to open five days per week.

In addition, [The Keep website](#) enables customers to plan their visit to The Keep in advance as well as access some services without the need to visit The Keep building. The website is available 24hrs per day from anywhere with an internet connection. Customers can browse the catalogue, find out general information about the collections and services, view the events programme and book and pay for tickets for events.

Customers can register as a Reader (get an account/become a member) online rather than coming into the centre. This allows them to order documents they source on the catalogue (which they can then view at The Keep in hard copy), create wish-lists and save their searches for use another time.

Support is available if customers need help using the website. "Welcome Wednesday" sessions are run once a month which are supported by volunteers and help new users get to know the set up and collections and these will re-start when Covid-related restrictions permit. [How-to notes are available on the website](#), and in paper form at The Keep. These will be improved to make them more user-friendly and in plain English. Volunteer computer buddies will be recruited to support customers with low IT levels when Covid-related restrictions permit.

- g) How will any mitigation measures be monitored?**

No specific actions are proposed however we will continue to monitor customer feedback to ensure that the changes do not disproportionately impact people who follow a particular religion or hold a particular belief.

4.8 Sexual Orientation - Gay, Lesbian, Bisexual and Heterosexual: Testing of disproportionate, negative, neutral or positive impact.

a) How is this protected characteristic reflected in the County/District/Borough?

| Sexual Orientation | UK estimate |
|--------------------|-------------|
| Heterosexual | 93.5% |
| Lesbian or Gay | 1.1% |
| Bisexual | 0.4% |
| Other | 0.3% |
| Did not answer | 4.7% |
| Total | 100% |

Source: ONS, Self-Perceived Identity Overview, 2012

b) How is this protected characteristic reflected in the population of those impacted by the proposal, project or service?

| | Number of respondents | Percentage |
|---------------------|-----------------------|-------------|
| Bi/Bisexual | 5 | 1.81% |
| Heterosexual | 192 | 70.40% |
| Gay woman / lesbian | 5 | 1.81% |
| Gay man | 9 | 3.25% |
| Other | 2 | 0.72% |
| Prefer not to say | 41 | 14.8% |
| No answer | 20 | 7.22% |
| Total | 277 | 100% |

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c) Will people with the protected characteristic be more affected by the proposal, project or service than those in the general population who do not share that protected characteristic?

At this stage, there is not considered to be an impact for users of The Keep of the proposed changes to opening hours based on sexual orientation.

d) What is the proposal, project or service's impact on people with differing sexual orientation?

As above.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

No specific actions are proposed, other than the general mitigations to reduce negative impact.

f) Provide details of the mitigation

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The general approach to avoid or reduce negative impact is to continue to open five days per week.

In addition, [The Keep website](#) enables customers to plan their visit to The Keep in advance as well as access some services without the need to visit The Keep building. The website is available 24hrs per day from anywhere with an internet connection. Customers can browse the catalogue, find out general information about the collections and services, view the events programme and book and pay for tickets for events.

Customers can register as a Reader (get an account/become a member) online rather than coming into the centre. This allows them to order documents they source on the catalogue (which they can then view at The Keep in hard copy), create wish-lists and save their searches for use another time.

Support is available if customers need help using the website. "Welcome Wednesday" sessions are run once a month which are supported by volunteers and help new users get to know the set up and collections and these will re-start when Covid-related restrictions permit. [How-to notes are available on the website](#), and in paper form at The Keep. These will be improved to make them more user-friendly and in plain English. Volunteer computer buddies will be recruited to support customers with low IT levels.

g) How will any mitigation measures be monitored?

No specific actions are proposed however we will continue to monitor customer feedback to ensure that the changes do not disproportionately impact people with this protected characteristic.

4.9 Other: Additional groups/factors that may experience impacts - testing of disproportionate, negative, neutral or positive impact.

4.9.1 Additional Factor 1: Carers

a) How are these groups/factors reflected in the County/District/Borough?

Provision of unpaid care, East Sussex and District (Percentage)

| | East Sussex | Eastbourne | Hastings | Lewes | Rother | Wealden | Brighton and Hove ¹ |
|--|-------------|------------|----------|-------|--------|---------|--------------------------------|
| People provide no unpaid care | 88.7 | 89.4 | 89.5 | 88.2 | 87.6 | 88.8 | |
| People provide unpaid care | 11.3 | 10.6 | 10.5 | 11.8 | 12.4 | 11.2 | |
| Provides 1 to 19 hours unpaid care a week | 7.5 | 6.7 | 6.3 | 8.2 | 8 | 8 | |
| Provides 20 to 49 hours unpaid care a week | 1.3 | 1.3 | 1.5 | 1.2 | 1.4 | 1.2 | |
| Provides 50 or more hours unpaid care a week | 2.5 | 2.6 | 2.7 | 2.4 | 3 | 2.1 | |

¹ Data for B&H to add

b) How is this group/factor reflected in the population of those impacted by the proposal, project or service?

| | Number of respondents | Percentage |
|-------------------|-----------------------|-------------|
| Yes | 28 | 10.11% |
| No | 206 | 74.37% |
| Prefer not to say | 11 | 3.97% |
| Not answered | 32 | 11.55% |
| Total | 277 | 100% |

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c) Will people within these groups or affected by these factors be more affected by the proposal, project or service than those in the general population who are not in those groups or affected by these factors?

Due to caring responsibilities, carers may have less flexibility about the time and day that they can visit The Keep compared to other members of the public.

d) What is the proposal, project or service’s impact on the factor or identified group?

The proposed changes have been developed to minimise the impact for current visitors to The Keep. This has been done by opening only 30 minutes later on three days and closing only one hour earlier, with the exception of Thursday and Saturday afternoons when the building would be closed from 1pm. Please refer to the table of current and proposed opening hours in 2.1 b).

As a result of the way the proposed reduction in hours is spread across five days, it is not anticipated that the proposed reduction would disproportionately negatively impact customers with caring responsibilities.

However, if people with caring responsibilities were unable to visit within the reduced hours they would be more reliant on the website or be able to visit The Keep less frequently.

e) What actions are to/ or will be taken to avoid any negative impact or to better advance equality?

A project to improve the accessibility of the website was completed in September 2020 and accessibility standards are adhered to in all correspondence and online messaging.

f) Provide details of the mitigation.

The general approach to avoid or reduce negative impact is to continue to open five days per week.

In addition, [The Keep website](#) enables customers to plan their visit to The Keep in advance as well as access some services without the need to visit The Keep building. The website is available 24hrs per day from anywhere with

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an internet connection. Customers can browse the catalogue, find out general information about the collections and services, view the events programme and book and pay for tickets for events.

Customers can register as a Reader (get an account/become a member) online rather than coming into the centre. This allows them to order documents they source on the catalogue (which they can then view at The Keep in hard copy), create wish-lists and save their searches for use another time.

Support is available if customers need help using the website. "Welcome Wednesday" sessions are run once a month which are supported by volunteers and help new users get to know the set up and collections and these will re-start when Covid-related restrictions permit. [How-to notes are available on the website](#), and in paper form at The Keep. These will be improved to make them more user-friendly and in plain English. Volunteer computer buddies will be recruited to support customers with low IT levels when Covid-related restrictions permit.

g) How will any mitigation measures be monitored?

No specific actions are proposed however we will continue to monitor customer feedback to ensure that the changes do not disproportionately impact people with this protected characteristic.

4.10 Human rights - Human rights place all public authorities – under an obligation to treat you with fairness, equality, dignity, respect and autonomy. **Please look at the table below to consider if your proposal, project or service may potentially interfere with a human right.**

| Articles | |
|----------|---|
| A2 | Right to life (e.g. pain relief, suicide prevention) |
| A3 | Prohibition of torture, inhuman or degrading treatment (service users unable to consent, dignity of living circumstances) |
| A4 | Prohibition of slavery and forced labour (e.g. safeguarding vulnerable adults) |
| A5 | Right to liberty and security (financial abuse) |
| A6 &7 | Rights to a fair trial; and no punishment without law (e.g. staff tribunals) |
| A8 | Right to respect for private and family life, home and correspondence (e.g. confidentiality, access to family) |
| A9 | Freedom of thought, conscience and religion (e.g. sacred space, culturally appropriate approaches) |
| A10 | Freedom of expression (whistle-blowing policies) |

| | |
|------------------|---|
| A11 | Freedom of assembly and association (e.g. recognition of trade unions) |
| A12 | Right to marry and found a family (e.g. fertility, pregnancy) |
| Protocols | |
| P1.A1 | Protection of property (service users property/belongings) |
| P1.A2 | Right to education (e.g. access to learning, accessible information) |
| P1.A3 | Right to free elections (Elected Members) |

Part 5 – Conclusions and recommendations for decision makers

5.1 Summarise how this proposal/policy/strategy will show due regard for the three aims of the general duty across all the protected characteristics and ESCC additional groups.

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010;
- Advance equality of opportunity between people from different groups
- Foster good relations between people from different groups

The proposed reduction to The Keep opening hours has been developed to avoid disproportionate impact on current users while achieving the required financial saving in order to ensure the medium-term sustainability of The Keep.

Appropriate mitigations have been put in place to avoid unlawful discrimination and advance equality of opportunity. The efficacy of these mitigations will continue to be monitored.

The Keep contributes to the three aims of the general duty by seeking to offer equal access to everyone who wishes to view the archives in our collections.

5.2 Impact assessment outcome Based on the analysis of the impact in part four mark below ('X') with a summary of your recommendation.

| X | Outcome of impact assessment | Please explain your answer fully. |
|----------|--|---|
| | A No major change – Your analysis demonstrates that the policy/strategy is robust, and the evidence shows no potential for discrimination and that you have taken all appropriate opportunities to advance equality and foster good relations between groups. | This is a final EqIA following assessment of the data collected during the public consultation regarding the proposed change to opening hours. Based on our analysis of public consultation data from 14 September to 25 October 2020, the |
| | B Adjust the policy/strategy – This involves taking steps to remove barriers or to better | |

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| | | |
|----------|---|--|
| | advance equality. It can mean introducing measures to mitigate the potential effect. | partnership is satisfied that the adoption of revised opening hours will not unlawfully discriminate against The Keep's current and potential users and that we have taken reasonable steps to ensure the needs and views of protected groups have been considered among existing users of The Keep. |
| X | C Continue the policy/strategy - This means adopting your proposals, despite any adverse effect or missed opportunities to advance equality, provided you have satisfied yourself that it does not unlawfully discriminate | |
| | D Stop and remove the policy/strategy – If there are adverse effects that are not justified and cannot be mitigated, you will want to consider stopping the policy/strategy altogether. If a policy/strategy shows unlawful discrimination it <i>must</i> be removed or changed. | |

5.3 What equality monitoring, evaluation, review systems have been set up to carry out regular checks on the effects of the proposal, project or service?

Customer complaints arising from the proposed changes to opening hours will be monitored and kept under review by the Keep Management Team at three-monthly intervals for a period of 12 months.

5.4 When will the amended proposal, proposal, project or service be reviewed?

If approved, the proposed changes would be implemented in April 2021 and would be reviewed 12 months after implementation in April 2022.

| | | | |
|------------------------|------------------|--|--|
| Date completed: | 1/12/2020 | Signed by (person completing) | Jack Pierce |
| | | Role of person completing | Principal Customer Services Officer |
| Date: | 4/12/20 | Signed by (Manager) | Lucy Corrie |

Part 6 – Equality impact assessment action plan

If this will be filled in at a later date when proposals have been decided please tick here and fill in the summary report.

| |
|---|
| x |
|---|

The table below should be completed using the information from the equality impact assessment to produce an action plan for the implementation of the proposals to:

1. Lower the negative impact, and/or
2. Ensure that the negative impact is legal under anti-discriminatory law, and/or
3. Provide an opportunity to promote equality, equal opportunity and improve relations within equality target groups, i.e. increase the positive impact
4. **If no actions fill in separate summary sheet.**

Please ensure that you update your service/business plan within the equality objectives/targets and actions identified below:

| Area for improvement | Changes proposed | Lead Manager | Timescale | Resource implications | Where incorporated/flagged? (e.g. business plan/strategic plan/steering group/DMT) |
|----------------------|------------------|--------------|-----------|-----------------------|---|
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

6.1 Accepted Risk

From your analysis please identify any risks not addressed giving reasons and how this has been highlighted within your Directorate:

| Area of Risk | Type of Risk? (Legal, Moral, Financial) | Can this be addressed at a later date? (e.g. next financial year/through a business case) | Where flagged? (e.g. business plan/strategic plan/steering group/DMT) | Lead Manager | Date resolved (if applicable) |
|--------------|---|--|---|--------------|----------------------------------|
| | | | | | |
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