

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 Llandudno Junction		
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 6/8/14

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, eg, 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.

Llandudno Junction Library

The current Llandudno Junction Library is a small library, which is open 9.5 hours per week. It attracts just over 3,600 visits p.a. or approximately 8 visits per hour open; the number of visitors per hour to this library is relatively low. This library had 134 “active” borrowers [as CIPFA definition of active borrowers] in 2013/14: 76 children; 58 adults and 50 “unique” users of the Public Access computers. Of the children who use this library, 73% were aged 10 years or under (*Children’s PLUS User Survey, 2011*); of the adults using this library, 42% were aged 65 years or over and 32% declared mobility impairments. (*Adult PLUS User Survey, 2012*).

Usage and Performance figures for Llandudno Junction Library 2013/14

Visitor Figures	3,697
Items loaned	4,845
Enquiries annual total	520
Computer usage – total sessions	917
Events (including story-times for children)	0

Hours open per week	Visitors per annum	Visitors per hour open	Items loaned per hour open	Computer session per hour open
9.5	3,697	8	9	2

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. children’s activities and WiFi provision.
- 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 Llandudno Junction, Deganwy and Conwy will benefit from the provision of a new / refurbished Area Library with better opening hours, improved facilities and more consistent services.
- When Llandudno Junction Library is closed, if the new Area library* is not based within Llandudno Junction, 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 Llandudno Junction Library, if the new Area library is based within Llandudno Junction itself, this will offer the area a new, improved community resource. *Location yet to be decided

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

- Current users of Llandudno Junction library
- The people who live in Llandudno Junction and the surrounding areas.
- Women, older people and young people, who are the main users of this library.
- Elected members representing this area.
- Town & Community Councillors for the wards of Marl and Pensarn.
- Library staff and council staff.
- Representatives from protected characteristic groups.
- 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 Corporate Consultation 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 you 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 a loss of access to the 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 Llandudno Junction Library were: 100% <i>White British or Irish</i>, while according to the 2011 Census Data for Conwy County Borough, 96% of the population were White British or Irish. Therefore, it is unlikely there will be much 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 Llandudno Junction Library. ○ The new area library (and all other area libraries in Conwy County) will be able to offer a far greater diversity of stock than is currently available in Llandudno Junction Library. ○ Access to the stock in all libraries is available by ordering through our electronic catalogue (24/7) and picked up at the nearest library.

	<ul style="list-style-type: none"> ○ Access to a range of reading material and the ability to request additional material via the Mobile library, once new Mobile stops are in place. ○ Groups like NWREN were made aware of the <i>Modernising Libraries</i> Consultation 2011 but we did not receive any feedback to show there were any specific issues affecting people from different races in this community. ○ 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 <i>Adult PLUS User Survey (2012)</i>:</p> <ul style="list-style-type: none"> ○ 62% of the adults using Llandudno Junction Library recorded having one or more disabilities; of these users 32% had mobility impairments and 26% hearing impairments. <p>According to the 2011 Census data for Conwy County Borough, 24.2% have some sort of <i>limiting long term illness</i> (12.2% have their “day to day activities limited a lot”; 12.2% have their “day to day 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 & 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 library is not located in Llandudno Junction, we will ensure that this group can still access these services from the Mobile library by providing Mobile stops 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 open longer and have a much greater choice of book-stock,

	<p>including access to the <i>Books on Prescription Scheme</i> and other books/ information on health and well-being. These books can be ordered electronically from home using our Online Catalogue to be collected at their library of choice or via the Mobile Library.</p> <ul style="list-style-type: none"> ○ The current accessibility of Llandudno Junction Library is questionable. The building has: <ul style="list-style-type: none"> ○ no automatic/ assisted power doors; ○ no public or disabled toilets; ○ no “hearing loop”; ○ limited turning space to manoeuvre wheelchairs/ mobility scooters. ○ The area library will be a new accessible facility for the 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 invited to stakeholder group meeting. ○ 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, while the 2012 <i>Adult PLUS User Survey</i> showed that 64% of adults using Llandudno Junction Library were female. Closure of this library therefore could 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 Llandudno Junction, we will ensure that this group can still access library services via the Mobile library by providing Mobile library stops in specific areas within this community where the need is greatest. ○ The new area library (and all the other area libraries), will offer a much greater choice of book-stock and information which will be of relevance to women; this can either be accessed directly or ordered via our Online Catalogue and 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 is likely to offer more activities for families, including women with children.
Age	<p>Conwy County Borough has the largest proportion of post-retirement age (aged 65 years and older) in Wales (Census 2011) at 24.7% of the population. Small Area Statistics (Census 2011) showed that 24.8% and 19.3% of people living in the Marl and Pensarn wards of Llandudno Junction, respectively, are aged 65 years and over.</p>

In 2013/14, Llandudno Junction Library had 134 registered “active” borrowers (as CIPFA definition of active borrowers) which is broken down into 76 children; 58 adults.

According to the *Adult PLUS User Survey (2012)* 42% of adults using Llandudno Junction Library were aged 65 years or over. The Library Service (2013-14) in-service statistics showed that the ratio of adults to children (aged under 16 years) using the library was: 73% adults to 27% children.

Access to Services

- If Llandudno Junction Library closed, this could particularly 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 and health & well-being services.

Social Isolation.

- According to the *Conwy Older People’s Strategy (2012)* their well-being is very much dependent on social support and having an “engaged lifestyle”. If Llandudno Junction Library closes, this could mean the loss of a community meeting place for older people and the associated loss of social networks.

Increased Travel Time

- Llandudno Junction Library is 1.25 miles from Conwy Library, 1.5 miles from Deganwy Library, and 3.5 miles from Llandudno Library. If this library closes, it will mean a greater distance to travel on public transport for those who need to access other libraries.
- In the Pensarn and Marl Wards of Llandudno Junction, 22.4% and 16.9% of the population, respectively, do not have a car (Census 2011), this could impact on older people in terms of further travel. Although pensioners in Conwy are eligible for free bus passes (so would not lose out financially), some older people may not be able to use or access public transport.

Impact on Children and Young People

- The closure of this library could particularly impact on younger children who would be unable to travel alone to another library, as according to the *Children’s PLUS User Survey (2011)* 73% 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); children's summer activities; 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 that the most important issues to children, in priority order were:

- 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.

The new area library will specifically help to meet points 1,2, 4-7 (as listed above).

- o Children from Llandudno Junction will still have access to the SRC via either the new Area library or the Mobile Library.
- o For those children who are too young to travel to the new area library, it may be possible to offer a Mobile stops near the school to encourage them to use library services.
- o There will be more activities for children and young people held at the new area library
- o Women with pushchairs and buggies will find it easier to access the new area library.
- o Pensioners in Conwy have a free bus pass, so won't lose out financially by having to travel further. If the new area library is not located in Llandudno Junction, we will set up Mobile library stops in central locations within this community, including areas of sheltered accommodation.

Religion & Belief

The *Adult PLUS User Survey* (2012) showed that 0% of adult users were from a minority religious group, while the Census data for Conwy County Borough (2011) showed that 0.5% of the population were Muslim with less than 0.5% Buddhist, Hindu, Jewish or Sikh.

While we do not anticipate that there is likely to be much impact on this group, we are aware that there is a mosque in Llandudno Junction.

It is also possible that people within this group could suffer loss of access to the diversity of stock

	<p>offered by a static library.</p> <p><u>Mitigating Factors</u></p> <ul style="list-style-type: none"> ○ A large range of stock is also available on (and can be ordered from) the Mobile library. We will ensure that this group can still access the service by introducing central Mobile stops if the new library is not located in Llandudno Junction. ○ An even larger, more diverse collection of stock will be available in the new area library, and is available at all area libraries. ○ Relevant stock can also be requested electronically via our Online Catalogue to be picked up at either the new area Library or any other library of their choice. ○ We did not receive any feedback from the <i>Modernising Libraries</i> public consultation (2011) to show that there were any specific issues affecting people from different races. ○ The Conwy IMAN Centre in Llandudno Junction were contacted and asked to specifically contribute to the consultation.
<p>Sexual Orientation</p>	<p>According to the <i>Adult PLUS User Survey (2012)</i>:</p> <ul style="list-style-type: none"> ○ 3% of adult users of Llandudno Junction Library were gay or lesbian. <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 in 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.
<p>Gender Reassignment</p>	<p>We are not aware that this group would specifically be affected by closure of this library.</p> <p>The “Unique Transgender Network” which covers North Wales was specifically asked to contribute to the Consultation.</p>
<p>Marriage & Civil Partnership</p>	<p>We are not aware that this group would specifically be affected by closure of this library.</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></p> <ul style="list-style-type: none"> ○ Baby changing and breast feeding facilities be provided in the area library.
Welsh Language	<p>Census data (2011) show that 27.4% of the population of Conwy County Borough is Welsh speaking, while ward statistics (Census 2011) showed that 29.8% and 28.4% of the population in the Marl and Pensarn wards of Llandudno Junction, respectively, speak Welsh.</p> <p>Llandudno Junction Library currently has Welsh speaking staff and offers bilingual and Welsh language book-stock; there is also access to bilingual council information and other “official” information. Therefore closure of this library could reduce access to a bilingual facility for Welsh speakers.</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) to be picked up at any library of their choice.
Other (please state)	<p><u>Economic Deprivation</u></p> <p>Although unemployment in the Wards of Pensarn and Marl was 3.9% and 2.8% respectively (Nomis, August 2013) the percentage of those of working age and claiming Benefits (of all types) was 18.3% and 14.5% respectively (February 2013). There could be an effect on this group, who may incur additional travel costs if they need to travel further to access the new area library.</p> <p>There may be a loss of links with the local school. However, the school has not used the library in recent years.</p>

	<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. ○ We will work with the local community to promote any new Mobile Library stops. ○ Staff in the new area Library will work in partnership with this community to increase the promotion and marketing of the new area library.
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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 affected by the closure of Llandudno Junction Library would be: women, young children, Welsh speakers, older people and those with a disability.</p> <p>According to the 2011 Census data for Conwy County Borough:</p> <ul style="list-style-type: none"> ○ 96.1% of the population is from White British or Irish ○ 51.6% are female ○ 24.2% have a <i>limiting long terms illness (LLL)</i> ○ 24.7% are aged 65 years or older; 17.1% are pensioners living alone ○ 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>Accessibility Audit – Llandudno Junction Library (2013)</p> <p>The current accessibility of Llandudno Junction Library is questionable, as the building has: no automatic/ assisted power doors; no public or disabled toilets; no “hearing loop”; limited turning space to manoeuvre wheelchairs/ mobility scooters and no disabled parking</p> <p>The <i>Adult PLUS Public Library Users Survey (2012)</i> provided specific data from adult users of</p>	<p>Initial EIA Screening</p> <p>Complaints</p> <p>Compliments</p> <p>Service User data</p> <p>Service User Feedback</p> <p>Inspections or Audits</p>

<p>Llandudno Junction Library :</p> <ul style="list-style-type: none"> ○ 38% of adult users of this library did not record that they had a disability ○ 42% of all adult users were aged 65 year or over; 64% were female ○ 100% were White British or Irish; 3% were LGB <p>A <i>Community Impact Assessment</i> (2013) was completed for Llandudno Junction Library as part of the Modernising Libraries Review, which showed the following data for the wards of Pensarn and Marl:</p> <ul style="list-style-type: none"> ○ 24.8% and 19.3% were of pensionable age (65 years or over) ○ 51.3% and 52.1% were female ○ 22.4% and 16.9% have no car though there is a regular bus service to Llandudno and Conwy ○ 3.9% and 2.8% were unemployed, though 18.3% and 14.5% of those of working age were claiming Benefits (Nomis 2013) <p>Feedback from the <i>Modernising Libraries Consultation</i> (4 July – 26 August 2011) showed that those using Llandudno Junction Library were appreciative of the service and many users of this library said they would like to see it stay open. However, the stakeholder workshop for this area showed that there was some support for a new area library, though some people felt it could lead to increased travel. They said they felt it would need to be on a bus route and that its location should be considered carefully. However, many also said the new library may increase access to and improve the quality of services provided.</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; this is due to historical differences and/ or 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 Consultation</i>. Results from this feedback, 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>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>

<p><i>Twelfth Man</i> (2006) undertook research on the use of public libraries by the general public (users and non-users). This report also helped inform the <i>Modernising Libraries Strategy</i>. It recommended that without major change 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, if they are to retain relevance.</p> <p>The <i>Welsh Index of Multiple Deprivation</i> (WIMD 2011) 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” (this includes access to public libraries). Currently, six areas within Conwy County Borough feature in the 10% most deprived areas in Wales with regard to “access to services”; these are: <i>Uwch Conwy, Eglwysbach, Llangernyw, Uwchaled, Llansannan, Betws yn Rhos</i>. Llandudno Junction is not part of any of these areas. However, isolation of older people is not limited to rural communities, as one in five households in Conwy County is occupied by a single pensioner (Census 2011), a significant number of whom may not have local family support, having moved to the area to retire. This needs to be taken into consideration when planning services.</p> <p>The <i>Public Library User Survey, PLUS</i> – 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 <i>Adult PLUS User Survey</i> (2012) gathered for Llandudno Junction has also been used to help inform this assessment.</p> <p>See section 5 for further information on protected group and mitigating factors.</p>	
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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 this consultation has helped inform our decision to proceed with the closure of Llandudno Junction 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 those with mobility impairments, older people and the unemployed, who have mentioned the impact that the closure of this library would have on them.

The 2012 *Adult PLUS User Survey* showed that: the majority of adult users (64%) of Llandudno Junction Library were female; only 38% of all adult library users didn't class themselves as having a disability. So it is likely that those most be affected by the closure will mainly be women and disabled people (including many older people in these groups).

This survey also showed there were very few non White British adult users or users from Minority religions.

Usage statistics for 2013/14, showed that of the 134 “active users” at this library (CIPFA definition of active borrowers) 76 were children; the *Children's PLUS Survey* (2011) showed that 73% of children who use this library were 10 years and under.

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?

The ward statistics for the two wards in the Llandudno Junction area (Census 2011) showed that 29.8% and 28.4% of adults in the Marl and Pensarn wards of Llandudno Junction, respectively, are Welsh speakers; 14.5% and 18.3% of adults of working age in the Marl and Pensarn wards, respectively were claiming benefits and that 16.9% and 22.4% of households do not have a car.

The general demographic for Conwy shows that there are a small percentage of non White/Irish people living in the county, plus a small percentage of minority religious groups. However, we have spoken to members of the general public in Conwy County Borough in the *Modernising Libraries* Consultation (2011) and have targeted groups that represent minority races and religions – we have received no feedback to indicate any particular adverse affect on these particular groups.

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

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.

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. However, many older people have access to free transport, though it is recognised that not all of this group may be able to use public transport.

This library currently opens for only 9.5 hours per week, which means that access to library services within this library is very limited anyway, especially for those who are working during the day.

Llandudno Junction Library is not fully accessible as explained in section 5.

Mitigating Factors

- Any new area library, that is established, will be fully accessible which would improve access for disabled people.
- A new area library will have parking spaces for disabled people.
- If Llandudno Junction Library is closed (and if the new Area library is not based in Llandudno Junction), we will need to offer Mobile Library stops at suitable locations within this community, e.g. central locations like the Memorial Hall, near the school, at areas of sheltered accommodation. The Mobile Library service may be particularly useful for those with limited mobility.
- Current users of Llandudno Junction 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 communities, we will be able to provide both existing and potential customers with a more consistent, better quality library experience.

This will include access to an improved library building with better stock and better opening hours and a building which is fit for purpose. The new library will also provide better access for disabled people and has the potential to offer those using it access to more library events and services.

We will provide access to the Home Library Service for those with severe mobility impairments.

If the new area library is not based in Llandudno Junction, we will be able to offer Mobile Library stops at targeted areas in this community, which will be located where the need is greatest.

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 We are not aware of any particular issues affecting this group – see section 5 and 13 above for more details.	Black Minority Ethnic groups Gypsies / Travellers Language
Disability See sections 5 and 13 above for more details and mitigating factors	Mobility Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities
Sex See sections 5 and 13 above for more details and mitigating factors	Men Women
Age See sections 5 and 13 above for more details and mitigating factors	Older People Children Young People
Religion & Belief We are not aware of any particular issues affecting this group – see section 5 and 13 above for more details.	Faith communities
Sexual Orientation We are not aware of any particular issues affecting this group – see section 5 and 13 above for more details.	Gay Lesbian Bi-sexual Heterosexual
Gender Reassignment We are not aware of any particular issues affecting this group – see section 5 and 13 above for more details.	A person who proposes to, starts or has changed his or her gender
Marriage & Civil Partnership We are not aware of any particular issues affecting this group – see section 5 and 13 above for more details.	
Pregnancy & Maternity We are not aware of any particular issues affecting this group – see section 5 and 13 above for more details.	
Human Rights We are not aware of any particular issues here.	Right to Education, Private and Family Life, Protection of property, etc

Welsh Speaking Communities See sections 5 and 13 for more details and mitigating factors.	
Other socially excluded groups or communities (please state) See sections 5 and 13 for more details and mitigating factors	

15. If you answered No to Question 13, 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 14, 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 Llandudno Junction, Deganwy and Conwy, which will be accessible, offer better opening hours and a better quality, more consistent library service.
- Give current users notice of the closing date and explain how/where similar services can be accessed within existing libraries / library provision.
- Consider if the current Mobile Library is able to offer stops in some areas within Llandudno Junction when the library closes, e.g. near the school; near the Memorial Hall.
- Promote the Home Library Service to those with mobility impairments in this community who may be eligible to receive it.
- Ensuring the services offered by the new Area library are well promoted to people in this community.

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

- Increased partnership working with the local community groups to ensure we make them aware of any new services we offer.
- Liaise with the local community to ensure any new mobile stops we introduce are at locations where they are most needed.
- Ensure marketing and promotion of the new area library to ensure all in this community are aware of what is available at the new library.

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

Usage is at such a low level that there is no other viable alternative.

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	
Timescale for library closure to be agreed	Committee approval for closure	Decision at Cabinet: 9 September 2014 for closure on 27 February 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 2015	Section Head: Culture and Information	

Inform customers of this date as soon as possible and explain how/where similar services can be accessed within existing libraries / library provision.	Posters and press releases	1 December 2014	Section Head: Culture and Information	
Identify locations in the Llandudno Junction community where additional Mobile Library stops can be provided, if the Area Library is not located in Llandudno Junction .	New Mobile timetable to be in place once library closed	1 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	1 December 2014	Library Service Manager: Literacy and Learning	
Promotion of new Mobile library stops within the Llandudno Junction community	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		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 the local community, including the Llandudno Junction area	Ongoing	Library Managers/ Librarian - Conwy	
Librarian at the new area library to do outreach sessions, including groups working in the community, including the Llandudno Junction area.	Librarian and staff at Conwy library to work with groups in the local area, including	Ongoing	Librarian - Conwy	

	Llandudno Junction			
Promotion of services and activities at the new area library to those in the local community in Llandudno Junction, including the Black, Asian and ethnic minority community and other minority groups.	Action plan to network and market services to the local community, including the Llandudno Junction area	Ongoing	Library Managers/ Librarian - Conwy	
The Librarian at the new area library to do outreach sessions, including groups working in the community, including the Llandudno Junction area.	Librarian at Conwy library/ staff at Conwy library to work with groups in the local area, including Llandudno Junction.	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	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 and Review

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.

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 usage of any new mobile stops introduced in this community • Review postcode of area library users from this community • Analyse equalities data from the PLUS Survey of users at the new area library and the Mobile Library • Analyse patterns of usage re: opening hours 	Annual	Service Managers/ Librarian (new Area library)	

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.