

Appendix 1

EQUALITY ANALYSIS



Service:	Innovate
Activity/Project/Policy/Decision/Function being assessed:	Accommodation Project
Responsible Officer:	Sarah Cornforth

1.0 SCOPING THE ANALYSIS

1.1	Are you analysing something existing, new/proposed or changing? Yes
Answer:	<p><i>The Accommodation Project seeks to implement the 2010 Accommodation Strategy; this strategy sets out the key aims of the project and has been the method used to assess the potential options for consideration.</i></p> <p><i>The Council has a provisional proposal to explore the co-location of all staff on a single site at Knapping Mount. This would result in a change of working location and working environment for all staff currently based in the administrative buildings in Harrogate and a change in location of service delivery to our customers.</i></p>

1.2	Why are you doing it?
Links to docs/reports:	<p>2010 Accommodation Strategy Cabinet Report July 2013 Accommodation Strategy Cabinet Report February 2014 Appointment of consultants Cabinet Report March 2014 Consultation report Cabinet Report August 2014 Consultation outcome report Cabinet Report November 2014 Planning Application submission Cabinet Report July 2015 Accommodation Strategy</p>
Answer:	<p><i>The Accommodation Strategy report in July 2013 sets out the key aims and objectives of what the Council is trying to achieve and a comparison of the viable options available to the Council.</i></p> <p><i>As a summary the key aims are for the accommodation to be customer focussed, support new ways of working and cultural change, improved space utilisation and reduce costs, improved staff satisfaction, provide a sustainable solution to reduce energy use, be accessible to all, adopt uniform branding and be funded within resources available. The report also considers the wider economic benefits of the project.</i></p> <p><i>The report sets out the relative benefits of both refurbishing existing buildings and building new accommodation on the Knapping Mount site. The Council's preferred proposal is for new accommodation on the Knapping Mount site. (See July 2013 report)</i></p> <p><i>Following this decision the Council undertook a procurement exercise to appoint consultants to develop these proposals, this work will inform the Council in terms of the possible cost of the project and develop a concept design to inform the consultation process. (See Feb 2014 report).</i></p> <p><i>As part of the project the Council consulted the public on the preferred option (and gave suitable information in respect of other alternative options), to allow feedback on the proposal to consolidate on the Knapping Mount site and allow feedback on the concept plans. (see March 2014 report for consultation proposals and</i></p>

	<p><i>August 2014 report for a summary of the results)</i></p> <p><i>Consultation has been carried out with all groups to ascertain views about agreement to proceed with the preferred option these views informed the development/design of the project, a further consultation has been carried out on the design proposals prior to the submission of a planning application (see November 2014 report for a summary of the consultation and the resulting planning application).</i></p> <p><i>A tender exercise has now taken place to confirm the overall costs of the project and a report provided setting out the costs and benefits of proceeding with the accommodation project (July 2015 Report)</i></p>
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2.0	DATA/EVIDENCE
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2.1	<p>What data/research/consultation do you have (relating to any relevant protected characteristics) to support your analysis?</p> <p>Is additional information required to fill any gaps in your understanding?</p>	<p><u>Information & Guidance</u></p>
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Links to evidence:	<p>Public Sector Equality Duty - demonstrating compliance at Harrogate Borough Council (January 2015)</p> <p>Online consultation with staff during the development of the brief (September 2013) and a Building User Survey completed at each of the five main administration buildings (April 2014)</p> <p>Pre-Qualification Questionnaire in relation to company equalities policies completed by all consultants tendering for the project (Copy available on request)</p> <p>Consultation responses about agreement to proceed with the preferred option– setting out comments from stakeholders in respect of their views and any specific areas raised as a concern. This also included questions about visiting council buildings including frequency and reasons.</p> <p>Mid-consultation review – Copy of mid-consultation review including further work required, also copy of work and results of further consultation (copies available on request)</p>
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	<p>Consultation on the design proposals in order to inform the design, a breakdown of all of the comments and the response of the design team is set out in the Statement of Community Involvement (copy available on request)</p> <p>Consultation with a design user group to ascertain employee requirements within the new accommodation and consultation meetings with Harrogate and District Disability Access Group to specifically discuss design issues relating to disability (minutes available on request).</p> <p>Disability Access Report and Specification – developed by the design team to ensure that the design meet the requirements of the Equality Act 2010, notably Parts III (Goods & Services) and V (Employment), along with the requirements of the Building Regulations 2000 - Part M: Approved Document M – Access to and Use of Building (2004 Edition). (copy available on request)</p>
<p>Answer:</p>	<p><i>The council collects information about the profile of the district in relation to groups with protected characteristics.</i></p> <p><i>Some key information from this data includes:</i></p> <ul style="list-style-type: none"> • <i>When compared to the national age profile the district has a lower percentage of people aged 0 – 29 and a higher proportion of people aged 45+. The average age of a resident in the district is 42 years old. Around 26.5% of the district’s population are aged 60 and over; compared to 22.4% nationally and by 2030 the district’s population aged 65+ is projected to rise by around 15,000 people.</i> • <i>The district has comparatively low levels of people with a disability. 15.5% of the district’s population stated that their day-to-day activities were limited by a disability – this can be compared to 17.6% nationally (2011 Census).</i> • <i>In respect of the religious beliefs within the district 98.6% of the district’s population is either Christian, of no religion or did not state a religious belief (2011 Census). Of the remaining 1.4% of the district’s population 0.4% are Muslim, 0.3% are Buddhist, 0.2% are Jewish and 0.5% are of other religions/beliefs.</i> • <i>The gender split within the district is approximately equal with 48.8% males and 51.2% females</i> • <i>According to the 2011 Census the district demographic is predominantly comprised of people who</i>

consider themselves to be White (96.4%), however this has reduced from 99% in 2001. A breakdown of the remaining 3.6% shows of the larger groups 0.6% are Chinese, 0.5% Other Asian (not Pakistani or Indian), 0.4% African, 0.4% Indian and 0.4% White and Asian.

The above data confirms that any proposals must ensure that it deals with the needs of an older population and makes sufficient provision for people that may have lower levels of mobility when considering access to the site and its design. Although the level of disability is lower than the national average accessibility for all groups with a disability is a key part of any proposals for the new accommodation. In considering the needs of people with disabilities it is important to engage with established groups such as Harrogate and District Disability Access Group (HADDAG) and ensure that any consultation material can be made available in accessible formats.

The information above is helpful in understanding the profile of the district and therefore the Council's customers as a whole but it is helpful to have more information about the profile of the customers and visitors to the site in order to understand the characteristics of these groups, for example whether certain groups are disproportionately represented. A review of customer visit information from August – December 2014 suggests that a breakdown of the purpose of these visits shows that 46% of these visits were to use the payment machine and hence these visits were relatively short. A further 9% of visits were welcome desk quick queries and 8% parking services, again these visits would likely to be relatively short in duration. The remainder of reasons for visiting the offices includes benefits queries, council tax, planning and other specialist services.

During an 8 day period in November a questionnaire was also made available at the Crescent Gardens offices for visitors to complete about their visit and their mode of transport. 51 responses were completed and give an indication of where visitors to the site were coming from and how they travelled.

- 63% of respondees had either a HG1 or HG2 postcode and therefore travelling from within the immediate Harrogate town area
- 45% of respondees indicated that they had travelled by car as either the driver or the passenger and that of those that came by car 39% parked in the disc zone on Swan Road and 52% outside Crescent Gardens. Of the remainder 39% visited the site on foot and 16% arrived by bus.
- When asked the question about how the respondee would travel to the Knapping Mount site 37% indicated that they would travel by car, 35% on foot and 10% by bus, 4% by bus or walk and 3% by bus

or car depending on weather conditions.

- When asked about the length of their visit 93% suggested that this would be less than 1 hour, with 27% of the total suggesting that this would be less than 15 minutes.

Not all respondees completed the equalities information but from the data provided:

- 11% of visitors consider themselves to have a disability
- The age range of visitors is relatively evenly split across the ages 20-69, there are few visitors that are under 20 years of age or over 70
- The ethnicity of visitors is predominantly British
- Slightly more men than women visited the site
- Parking, council tax, and housing benefit are the main reasons cited for visiting the offices.

The Council also collects information in relation to the profile of its employees, the data from December 2014 is given below:

- *The council had a 'people in post' count of 1,176, which equated to 974.27 full time equivalents.*
- *The workforce is split 50% Male 50% Female but there are significantly more female part-time employees than male part-time equivalents*
- *Of the 930 council employees who had stated their ethnic origin in December 2013, 40 (4.3%) were non-White British, compared to 8.3% of the district's population (Census 2011).*
- *In December 2014, 22 (1.8%) of the council's workforce considered themselves to have a disability.*
- *In December 2014 the average age of a HBC employee was 45.4 years old, slightly higher than the profile of the district.*

During the procurement process to appoint the Design Team and as part of the PQQ stage all respondents were asked to provide a written statement to evidence their approach to Equalities, in particular Q4.3 a-k asks a number of equalities based questions including: do you have an equalities policy and is it available on their website or other. The Council's Equalities Officer was involved in the review of the PQQ's. This process was repeated as part of the contractor procurement process.

Full consultation with all staff affected by the proposals is an essential part of the project in order to ensure

that requirements for special characteristic groups are considered.

A mid-consultation review was undertaken and reported to the Accommodation Board (copy available on request) that identified response rates from all groups. Further work was also undertaken to obtain representative views (copy available on request) and additional responses obtained (copy available on request). These have enabled views about the consultation to be established.

The full consultation results are identified by protected characteristic group as far as possible and are also available on request.

The above has confirmed that the consultation received responses from as wide a range of groups with protected characteristics as possible to inform the work. If this was not possible then views from a number of representative groups have been obtained.

The consultation on the design proposals sought to gain views on the proposals for both visitors and employees. Analysis of the results indicated that:

- There were no gender specific issues apart from a concern in relation to personal safety – this is now being addressed in the design by the review of external lighting designs*
- There were no race or ethnicity specific issues raised*
- There were no specific age related issues or disability issues raised.*

Respondents did raise a concern in relation to the provision of parking on the site; the Council has sought to address this with the provision of additional spaces at HIC.

Specific engagement has been undertaken with the Harrogate and District Disability Access Group about the design and these comments have been fed into the design process. The design team will continue to meet with this group as the design is developed in more detail.

This further work is included in the action plan

3.0 ANALYSING THE IMPACT

The word 'Policy' is used to encompass anything that is being assessed.

3.1 How will the policy and resulting activities affect different communities and protected equality groups (including employees)?

[Information & Guidance](#)

Answer:

The impact of the new proposals are intended to be an improvement on the current provision both for employees and customers, however there could be an impact on some communities and protected characteristic groups:

Age and disability

- *Changes in the accessibility of the site (in terms of location) e.g. distance from the town centre and transport hubs for people with low mobility levels*
- *Changes in accessibility on the site e.g. changes in the levels for people with mobility problems, way finding on the site for people with visual impairments, access around the building for groups with a disability e.g. wheelchair users*
- *Changes in provision on the site such as car parking provision, this will be reduced from the current provision for employees and could impact on those with mobility issues*
- *Access for people with a hearing impairment such as a loop system at receptions/meeting areas not just included but staff training established and regular maintenance/checking to ensure availability and ability to switch on.*
- *Access to the site*

Pregnancy and maternity

- *possible changes in provision for new and expectant mothers*

Religion

- *Changes in accommodation may impact on some visitors and employees ability to carry out their prayer routine if space is currently provided for this. The consultation should highlight if this is a general*

requirement

Employee issues

- Changes in parking provision may impact on the distance that employees need to walk to their place of work, security concerns have been raised in this respect.
- Payment for parking may have a disproportionate impact on employees that work on a part time basis.

Protected Characteristics: AGE, DISABILITY, GENDER, RACE, SEXUAL ORIENTATION, RELIGION/BELIEF, PREGNANCY/MATERNITY, GENDER REASSIGNMENT

3.2 **What measures does or could the policy include mitigating any adverse or disproportionate impact?**

Answer:

There are a number of mitigating actions that can be taken to mitigate adverse implications, especially where these are taken into early within the design process, a number of these mitigating actions would be:

- *compliance with the latest Equality Act legislation included within the design*
- *accessibility study within the design to ensure that the site is as accessible as possible and ensure that all elements of the design are considered in respect of accessibility –this has included approach routes and external design, car parking and drop off, entrances, receptions, counters and lobbies, way finding and internal surfaces, internal doors and corridors, lifts, stairs, WCs, baby change, changing facilities, refreshment facilities, training and meeting rooms, means of escape, finishes and surfaces.*
- *consideration of disabled parking for employees and visitors to ensure sufficient provision on the site*
- *consideration of location and nature of toilet provision to cater for all groups with feedback from stakeholders leading to an increase in the size of the accessible toilet provision.*
- *consideration of provision of space within the design for new and expectant mothers to allow a space for rest periods during the working day*
- *consideration of provision of space to pray/meditate –this was not raised as part of the consultations but there is the flexibility within the proposals to allocate space to use a multifunctional space for this in most circumstances e.g. meeting room*

Consideration of the following:

Wheelchair access

Sufficient space for wheelchairs at:

- *Staff access to the building*
- *Entrance and reception area (including dropped reception counter / bells)*
- *Break-out areas*
- *Lifts*
- *Between desks*
- *Filing areas*
- *Toilets*
- *Refreshment areas / kitchens*

Adjustments to be in line with Health and Safety legislation and Building Regulations.

Sensory impairment

- *Hearing Loops have been included within key parts of the design*
- *Colour schemes for decor and signage needs to meet Royal National Institute for the Blind standards.*
- *Office design takes into account acoustics with the proposals developed in line with recommendations from an acoustician to ensure the design is suitably specified.*

Accessible meeting rooms

Need to ensure that all meetings rooms are fully accessible for wheelchairs and that hearing loops are checked and maintained.

Accessible Storage

Provision of low level accessible storage – mixture of storage is assumed with the detailed furniture procurement to be carried out at the next stage of design development.

Kitchen facilities

Standard kitchen facilities are proposed and in line with the relevant British Standards, adaptations being made if a future requirement is identified. Tables with removable chairs are proposed to enable people with wheelchairs or walking aids to dine in comfort with a minimum % provided with a back rest and arm rests to assist people in sitting down and standing up.

Adapted office furniture

Ensure people who require adapted office furniture that is related to a health condition are assisted. Ensure requirements for externally mobile staff that will not have a fixed desk are met, The furniture requirements will be developed at the next design stage an input sought from staff and Health and Safety colleagues.

Parking

Provision of accessible parking on site as well as supplementing this with circa 130 spaces at the HIC site, providing a total of 225 spaces for the development.

Policy implications

- *Agile working policy – this supports the move to reducing accommodation requirements and has been adopted equally across the council. Any impact on groups with protected characteristics will be identified as part of the end of roll out report.*
- *Travel Plan – supporting employees to adopt more sustainable travel arrangements and ensuring the this is applied equally and with as wide reaching actions as possible to suit all groups*
- *Parking Strategy – implemented to assist with dealing with the issues raised by employees and the public in relation to parking. The detail of the implementation of this policy will need to ensure that no group is disadvantaged and take into account the arrangements of part time workers.*

3.3 **What measures does or could the policy include to advance equality and foster good relations?**

[Information & Guidance](#)

Answer: *Newly designed accommodation will help minimise any existing disadvantages suffered by people due to their*

protected characteristics and will take into account the needs of people from protected groups. Use of the building may also provide services for people who share a protected characteristic – such as supporting older people to help them access information and services or making reasonable adjustments for people with a disability.

4.0 ADDRESSING THE IMPACT

The word 'Policy' is used to encompass anything that is being assessed.

Which of the options below best address the impact?

Options:

1. No major change - the EIA demonstrates that the policy is robust and that the evidence shows no potential for discrimination and that all opportunities to promote equality have been taken.
2. Adjust the policy to remove barriers or better promote equality.
3. Continue the policy despite potential for adverse impact or missed opportunities to promote equality.
4. Stop and remove the policy – if the policy shows actual or potential unlawful discrimination it must be stopped and removed or changed.

[Information & Guidance](#)

Answer:

Adjust the policy to remove barriers or better promote equality.

ACTION PLAN

A principle - derived from relevant case law decisions - states that the Public Sector Equality Duty is also a continuing duty, requiring continuing attention and a review of decisions post-implementation. Therefore, every EIA should, at least, result in an action plan that sets out the arrangements for reviewing the actual impact of a new policy or changes to an existing policy once it has been implemented. This could result in a Performance Indicator.

Beyond **monitoring, evaluation and review**. The action plan could include actions in the following categories:

- involvement and consultation;
- further data collection and evidence gathering;
- mitigating disproportionate or adverse impact; and/or
- taking any opportunity to advance equality and foster good relations.

You can produce the action plan by using the template below or by creating one on Covalent.

	ACTION	BY WHEN
1	Consultation undertaken on agreement to proceed with preferred option (with additional information obtained about visits to council facilities including location, number of visits and reasons) – ensuring that the document was accessible for all groups	Completed
2	Analysis of results to inform decision to proceed with some limited information on design	Completed
3	Carry out work to identify and analyse users of facilities and how they access council buildings taking into account the additional information received as part of the survey undertaken in July. Further work to analyse the reasons why people visit the site and the frequency of these visits.	Completed
4	Full consultation with all staff affected by the proposals ensuring that work to identify/analyse protected characteristics of staff is included to ensure that requirements are considered	Completed
5	Consultation with the public/staff etc as part of the development of the project	Completed and ongoing
6	Review the equalities impact of the project on an ongoing basis: project inception/post implementation/in 6 months/in a year	Initial consultation at beginning of the project design stage then on-going
7	Development of the furniture and internal colour scheme to ensure that these elements allow full accessibility	Summer/Autumn 2015
8	Further development and review of the Equality Analysis	On-going