

Equality & Human Rights Impact Assessment (EHRIA)

This Equality and Human Rights Impact Assessment (EHRIA) will enable you to assess the **new, proposed or significantly changed** policy/ practice/ procedure/ function/ service** for equality and human rights implications.

Undertaking this assessment will help you to identify whether or not this policy/ practice/ procedure/ function/ service** may have an adverse impact on a particular community or group of people. It will ultimately ensure that, as an Authority, we do not discriminate and we are able to promote equality, diversity and human rights.

Please refer to the EHRIA [guidance](#) before completing this form. If you need any further information about undertaking and completing the assessment, contact your [Departmental Equalities Group](#) or equality@leics.gov.uk

***Please note: The term 'policy' will be used throughout this assessment as shorthand for policy, practice, procedure, function or service.*

Key Details	
Name of policy being assessed:	Loughborough Localities Project within Ways of Working Programme - Service User impact of Pennine House Closure Version 1
Department and section:	Care Pathways A & C Direct Services A & C C & W Libraries A & C Adult Learning (A & C) Business Support A & C
Name of lead officer/ job title and others completing this assessment:	Ros Speight A&C Head of Service Support Services
Contact telephone numbers:	0116 3057534
Name of officer/s responsible for implementing this policy:	Loughborough Localities Steering Group (Ways of Programme)
Date EHRIA assessment started:	28/04/2021
Date EHRIA assessment completed:	26/05/2021 V1

Section 1: Defining the policy

Section 1: Defining the policy

You should begin this assessment by defining and outlining the scope of the policy. You should consider the impact or likely impact of the policy in relation to all areas of equality, diversity and human rights as outlined in Leicestershire County Council's [Equality Strategy](#).

1 What is new or changed in the policy? *What has changed and why?*

This EHIRA needs to be considered alongside the EHIRA for staff which was been signed off by A&C DEG (15th April) and CFS DEG (28th April).

The future of Pennine House has for some time been considered as an opportunity for savings, as the building has not been fit for purpose; in 2019 CMT made the decision that the lease would be terminated, and the building returned to the landlord. The changes in working patterns in response to COVID-19, with many more staff working from home, has made the need to consider the most efficient use of our buildings all the more urgent.

These changes are the first in a series of initiatives being delivered under the Council's emerging Ways of Working Programme aimed at future-proofing our future office model and wider property estate. This work encompasses engagement with departments about their workspace requirements and their service planning, some of which may be delivered in a different fashion in the future.

As Pennine House is not owned by the council it would not be possible to make it fit our requirements for the future, so it has been agreed to hand back Pennine House to the landlord from October 2021. In order to complete this handover to timescale, the building will be vacated from June 2021. This will result in the relocation of staff and services within the Loughborough locality.

As stated above the Loughborough Localities project is part of the wider Ways of Working Programme. In addition to workspaces other workstreams (including ICT/Technology and People Services) are in place to support colleagues with access to the right tools, technology and support to adapt to new ways of working.

The needs of service users, many of whom are from disadvantaged or vulnerable groups, are of highest priority. The Ways of Working Programme will focus on ensuring high quality accessible services are maintained throughout this programme.

2	<p>Does this relate to any other policy within your department, the Council or with other partner organisations? <i>If yes, please reference the relevant policy or EHRIA. If unknown, further investigation may be required.</i></p> <p>As mentioned above the changes in the Loughborough Locality are within a wider Ways of Working Programme, previously known as the Workplace Programme. This programme is currently being rescoped in light of the impact of Covid-19 and the existing EHRIA in place for the Workplaces Programme is under review EHRIA - workplace strategy draft v1.0 and will include impact on staff and customers.</p> <p>The Ways of Working Programme is aligned to a number of existing and emerging strategies within the Council including:</p> <p>Environmental Strategy (2019) - On the 15th May 2019, LCC declared a climate emergency and a number of associated commitments. The Ways of Working Programme offers an opportunity to contribute to this carbon reduction agenda including:</p> <ul style="list-style-type: none"> • Introducing smarter working to reduce both our travel and carbon footprint. • Encouraging staff to find greener ways of working. • Reducing waste, energy and water usage - e.g. reduced printing. • Promoting staff understanding as to how the workplace culture can contribute to achievement of our environmental commitment. <p>Wellbeing Strategy (2018-2023) - Leicestershire County Council is committed to creating a working environment which is both safe and fosters the best possible health and wellbeing for all our employees. Our goal is to become a workplace where employees are encouraged and enabled to make healthy lifestyle choices to improve their wellbeing both inside and outside of work.</p> <p>People Strategy – Support for Key Priorities including</p> <ul style="list-style-type: none"> • Supporting employee wellbeing and managing attendance. • Improving recruitment and retention. • Developing our leadership and management capabilities. • Implementing a strong people performance management culture. • Supporting the implementation of new ways of working. <p>Digital Strategy Support for Key Priorities</p> <ul style="list-style-type: none"> • Growing our digital skills. • Enabling technology to provide a reliant and resilient infrastructure which supports organisational development. <p>It is recognised that the Loughborough Locality is the first in a series of initiatives and that further service specific EHRIAs will be required in the future.</p>
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3	<p>Who are the people/ groups (target groups) affected and what is the intended change or outcome for them?</p> <p><u>A&C Service users (Direct Services)</u></p> <ul style="list-style-type: none"> • The Older Person's and Learning Disability Community Life Choices (Day Service) based at the Victoria and Albert facility has been relocated to an alternative improved Loughborough base at Carnegie, all with accessible facilities. Transport requests have been altered to take service users to the new facilities. Informal consultation was undertaken with service users and their carers prior to the move. • A Care Act review will be carried out with all service users (15 users) which will ensure the appropriateness of the placement and future need for individual service users and the service. • The Community Life Choices service at Carnegie was involved in the amalgamation discussion – including their service users with a learning disability, physical disability and/or autism (15 users). • The future procurement of Community Life Choices Services and proposals for in house services will be covered by a separate EHRIA as part of the Establishment Review. <p><u>A&C Customers (Libraries)</u></p> <ul style="list-style-type: none"> • The library has continued to offer a service throughout the pandemic, although it has been significantly reduced at times. From 12th April more elements of the offer resumed, including browsing and some Adult Learning classes. Over the summer the level of provision will continue to increase in line with government guidelines and by the autumn it is anticipated that a full library offer will have resumed. • To mitigate the impact on events and group meetings, an interim arrangement has been agreed with LALS, using one of the classroom facilities on a bookable basis. Following the review of Direct Services, it is hoped that the meeting room will be returned to the library service, thereby releasing this room back to LALS. • There will be additional pressure on the site's bandwidth which has the potential to negatively affect library customers using the public PCs, or library WiFi, LALS customers whose courses require use of LALS PCs and staff within the office environment. Libraries are key in addressing digital poverty, being one of the few places where residents can freely access a PC and WiFi free. Loughborough will also be a principal venue for delivery of the Council's Work+ programme which will rely on access to digital provision. • Library, LALS and Victoria and Albert receptions will contain leaflets to give to members of the public to tell them how to correctly access the services they require.
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- Some library customers may need additional support to direct them to the right services, or understand changes in normal provision.

A&C Learners (LALs)

- Library, LALs and Victoria and Albert receptions will contain leaflets to give to members of the public to tell them how to correctly access the services they require
- Face to face meetings will be held at alternative locations within the Loughborough locality where appropriate. These will need to be by prior appointment, complying with Covid secure protocols and risk assessments.
- Full access to classrooms at Loughborough Library is required from September 2021 when classes resume. This will ensure that LALS provides the required capacity for LALS planned provision, ensuring vulnerable groups are not displaced or disadvantaged by this project.

A&C Service Users (Care Pathway)

- We will be stopping cash payments from Pennine House and an alternative Post Office vouchers scheme is being implemented for ASCF, cash will be issued on presentation of the voucher in any Post Office. This will impact 11 service users (with a learning disability or mental ill-health) who will be supported through this change by Care Pathway, Business Support and Appointeeship and Deputyship staff as appropriate. Accessible information is also being developed.
- A wider EHRIA is being undertaken to consider impact on introduction of pre-payment cards and vouchers.
- Face to face meetings will be held at alternative locations within the Loughborough locality where appropriate. These will need to be by prior appointment complying with Covid secure protocols and risk assessments.
- Safeguarding meetings will still take place, but such meetings can now be in person (rather than virtual) subject to appropriate risk assessments, and meeting space will be prioritised.
- The loss of an in-person reception will mean the following:
 - People not open to social care, visiting the office will not now be able to be supported in their contact with the Customer Service Centre.
 - A number of known service users would often pop into Pennine House to speak to their allocated worker. Over time reception staff were able to identify where these individuals might be presenting differently and were able to raise such concerns with relevant Care Pathway staff as they had an established relationship with them.

	<ul style="list-style-type: none">○ Service users have not been able to “drop in” during the past year as reception areas have been closed since March 2020 due to the pandemic. Contact has been pre-arranged and via appointment.○ Reception staff could also signpost people to services.• Library, LALs and Victoria and Albert receptions will contain leaflets to give to members of the public to tell them how to correctly access the services they require.																
4	Will the policy meet the Equality Act 2010 requirements to have due regard to the need to meet any of the following aspects? (Please tick and explain how)																
	<table><tr><th></th><th>Yes</th><th>No</th><th>How?</th></tr><tr><td>Eliminate unlawful discrimination, harassment and victimisation</td><td>x</td><td></td><td>This is not the prime objective of the programme; however, it will focus on providing individuals with different ways of accessing services and will encompass the full range of need.</td></tr><tr><td>Advance equality of opportunity between different groups</td><td>x</td><td></td><td>This is not the prime objective of the programme, however it is personalised and designed to meet individual needs, available to all regardless of any protected characteristics.</td></tr><tr><td>Foster good relations between different groups</td><td>x</td><td></td><td>This is not the prime objective of the programme; however, it aims to support people and provide different ways to enable workers and service users to work together.</td></tr></table>		Yes	No	How?	Eliminate unlawful discrimination, harassment and victimisation	x		This is not the prime objective of the programme; however, it will focus on providing individuals with different ways of accessing services and will encompass the full range of need.	Advance equality of opportunity between different groups	x		This is not the prime objective of the programme, however it is personalised and designed to meet individual needs, available to all regardless of any protected characteristics.	Foster good relations between different groups	x		This is not the prime objective of the programme; however, it aims to support people and provide different ways to enable workers and service users to work together.
	Yes	No	How?														
Eliminate unlawful discrimination, harassment and victimisation	x		This is not the prime objective of the programme; however, it will focus on providing individuals with different ways of accessing services and will encompass the full range of need.														
Advance equality of opportunity between different groups	x		This is not the prime objective of the programme, however it is personalised and designed to meet individual needs, available to all regardless of any protected characteristics.														
Foster good relations between different groups	x		This is not the prime objective of the programme; however, it aims to support people and provide different ways to enable workers and service users to work together.														

Section 2: Equality and Human Rights Impact Assessment (EHRIA) Screening

Section 2: Equality and Human Rights Impact Assessment Screening

The purpose of this section of the assessment is to help you decide if a full EHRIA is required.

If you have already identified that a full EHRIA is needed for a policy/ practice/ procedure/ function/ service, either via service planning processes or other means, then please go straight to Section 3 on Page 7 of this document.

Section 2 A: Research and Consultation			
	Have the target groups been consulted about the following?	Yes	No*
5	a) their current needs and aspirations and what is important to them;	X	X
	b) any potential impact of this change on them (positive and negative, intended and unintended);	X	X
	c) potential barriers they may face.	X	X
	<i>Please see section 8 where different consultation regimes have been applied</i>	X	X
6	If the target groups have not been consulted directly, have representatives been consulted or research explored (e.g. Equality Mapping)?		X
7	Have other stakeholder groups/ secondary groups (e.g. carers of service users) been explored in terms of potential unintended impacts?	X	X
<p>*If you answered 'no' to the questions above, please use the space below to outline either what consultation you are planning to undertake or why you do not consider it to be necessary.</p>			
8	<p>Direct Services – Communications have been sent to service users informing them of the change of location. Reviews (including carers etc) have confirmed no concerns to date.</p>		
	<p>Library Customers and Adult Learners - Learning and library customers have not been informed at this stage due to neither the library service nor LALS being fully operational. If a group wanted to meet then the library service would negotiate with LALs to find a suitable meeting space, this space would be like for like.</p> <p>Learners should not need to be consulted as they book appropriate classes and venues that are available and meet their requirements.</p>		

	<p>Care Pathway/Business Services - No discussions have taken place with service users or carers who may need to access the building to speak to their allocated worker – though this has not been in place since March 2020. Communication will need to be considered through the Ways of Working Programme for circulation to service users and carers on open caseloads.</p> <p>Service users who will be moved on to the Post Office voucher scheme are being supported through the change by an allocated Care Pathway staff member / Business Support and the Appointeeship and Deputyship team as appropriate.</p> <p>General communication will be developed for the website and local media channels to inform potential customers/visitors with a facility to encourage people to give feedback.</p> <p>Information will be sent to local carers groups to ensure impact is mitigated.</p> <p>Signage (and contact numbers) will be displayed on the entrance to redirect any visitors to the site.</p> <p>Information will be collated regarding people who use the hand post facility at Pennine so that these people can be redirected</p>
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Section 2 B: Monitoring Impact				
9	Are there systems set up to:	Yes	No	
	a) monitor impact (positive and negative, intended and unintended) for different groups;	X		
	b) enable open feedback and suggestions from different communities	X		
Note: If no to Question 9, you will need to ensure that monitoring systems are established to check for impact on the protected characteristics.				
Section 2 C: Potential Impact				
10	Use the table below to specify if any individuals or community groups who identify with any of the ' protected characteristics ' may potentially be affected by the policy and describe any positive and negative impacts, including any barriers.			
		Yes	No	Comments
	Age		X	
	Disability		X	Sites are fully accessible and are in the town centre with more public and disabled car parking.

	Gender Reassignment		X	
	Marriage and Civil Partnership		X	
	Pregnancy and Maternity		X	
	Race		X	
	Religion or Belief		X	
	Sex		X	
	Sexual Orientation		X	
	Other groups e.g. rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, deprived or disadvantaged communities		X	
	Community Cohesion		X	
11	<p>Are the human rights of individuals <i>potentially</i> affected by this proposal? Could there be an impact on human rights for any of the protected characteristics? (Please tick)</p> <p>Explain why you consider that any particular article in the Human Rights Act may apply to the policy/ practice/ function or procedure and how the human rights of individuals are likely to be affected below: [NB: include positive and negative impacts as well as barriers in benefiting from the above proposal]</p>			
		Yes	No	Comments
	Part 1: The Convention- Rights and Freedoms			
	Article 2: Right to life		X	

	Article 3: Right not to be tortured or treated in an inhuman or degrading way		X	
	Article 4: Right not to be subjected to slavery/ forced labour		X	
	Article 5: Right to liberty and security		X	
	Article 6: Right to a fair trial		X	
	Article 7: No punishment without law		X	
	Article 8: Right to respect for private and family life		X	
	Article 9: Right to freedom of thought, conscience and religion		X	
	Article 10: Right to freedom of expression		X	
	Article 11: Right to freedom of assembly and association		X	
	Article 12: Right to marry		X	
	Article 14: Right not to be discriminated against		X	
Part 2: The First Protocol				
	Article 1: Protection of property/ peaceful enjoyment		X	
	Article 2: Right to education		X	
	Article 3: Right to free elections		X	
Section 2 D: Decision				
12	Is there evidence or any other reason to suggest that:	Yes	No	Unkno wn
	a) the policy could have a different affect or adverse impact on any section of the community?		X	
	b) any section of the community may face barriers in benefiting from the proposal?		X	

	Based on the answers to the questions above, what is the likely impact of the policy			
13	No Impact <input type="checkbox"/>	Positive Impact <input type="checkbox"/>	Neutral Impact <input checked="" type="checkbox"/>	Negative Impact or Impact Unknown <input type="checkbox"/>
Note: If the decision is 'Negative Impact' or 'Impact Not Known', an EHRIA Report is required.				
14	Is an EHRIA report required?	<input type="checkbox"/>	<input type="checkbox"/> No	

Section 2: Completion of EHRIA Screening

Upon completion of the screening section of this assessment, you should have identified whether an EHRIA Report is required for further investigation of the impacts of this policy.

Option 1: If you identified that an EHRIA Report *is required*, continue to Section 3 on Page 7 of this document.

Option 2: If there are no equality, diversity or human rights impacts identified and an EHRIA report *is not required*, continue to Section 4 on Page 14 of this document.

Section 3: Equality and Human Rights Impact Assessment (EHRIA) Report

Section 3: Equality and Human Rights Impact Assessment Report

This part of the assessment will help you to think **thoroughly** about the impact of the policy and to critically examine whether it is **likely** to have a positive or negative impact on different groups within our diverse communities. It should also identify any barriers that may adversely affect under-represented communities or groups that may be disadvantaged by the way in which we carry out our business.

Using the information gathered either within the EHRIA Screening or independently of this process, this EHRIA Report should be used to consider the impact or likely impact of the policy in relation to all areas of equality, diversity and human rights as outlined in Leicestershire County Council's Equality Strategy.

Section 3

A: Research and Consultation

When considering the target groups, it is important to think about whether new data needs to be collected or whether there is any existing research that can be utilised.

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| 15. | <p>Based on the gaps identified either in the EHRIA Screening or independently of this process, how have you now explored the following and what does this information/ data tell you about each of the diverse groups?</p> <ul style="list-style-type: none">a) current needs and aspirations and what is important to individuals and community groups (including human rights);b) likely impacts (positive and negative, intended and unintended) to individuals and community groups (including human rights);c) likely barriers that individuals and community groups may face (including human rights) |
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16.	Is any further research, data collection or evidence required to fill any gaps in your understanding of the potential or known effects of the policy on target groups?
<p>When considering who is affected by this proposed policy, it is important to think about consulting with and involving a range of service users, staff or other stakeholders who may be affected as part of the proposal.</p>	
17.	Based on the gaps identified either in the EHRIA Screening or independently of this process, how have you further consulted with those affected on the likely impact and what does this consultation tell you about each of the diverse groups?
18.	Is any further consultation required to fill any gaps in your understanding of the potential or known effects of the policy on target groups?

Section 3

B: Recognised Impact

19.	Based on any evidence and findings, use the table below to specify if any individuals or community groups who identify with any 'protected characteristics' are likely to be affected by this policy. Describe any positive and negative impacts, including what barriers these individuals or groups may face.	
		Comments
	Age	
	Disability	
	Gender Reassignment	
	Marriage and Civil Partnership	
	Pregnancy and Maternity	
	Race	
	Religion or Belief	
	Sex	
	Sexual Orientation	
	Other groups e.g. rural isolation, deprivation, health inequality, carers, asylum seeker and refugee communities, looked after children, deprived or disadvantaged communities	
	Community Cohesion	

20.	Based on any evidence and findings, use the table below to specify if any particular Articles in the Human Rights Act are likely to apply to the policy. Are the human rights of any individuals or community groups affected by this proposal? Is there an impact on human rights for any of the protected characteristics?	
		Comments
	Part 1: The Convention- Rights and Freedoms	
	Article 2: Right to life	
	Article 3: Right not to be tortured or treated in an inhuman or degrading way	
	Article 4: Right not to be subjected to slavery/ forced labour	
	Article 5: Right to liberty and security	
	Article 6: Right to a fair trial	
	Article 7: No punishment without law	
	Article 8: Right to respect for private and family life	
	Article 9: Right to freedom of thought, conscience and religion	
	Article 10: Right to freedom of expression	
	Article 11: Right to freedom of assembly and association	
	Article 12: Right to marry	
	Article 14: Right not to be discriminated against	
	Part 2: The First Protocol	
	Article 1: Protection of property/ peaceful enjoyment	
	Article 2: Right to education	
	Article 3: Right to free elections	

Section 3 C: Mitigating and Assessing the Impact	
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Taking into account the research, data, consultation and information you have reviewed and/ or carried out as part of this EHRIA, it is now essential to assess the impact of the policy.

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| 21. | If you consider there to be actual or potential adverse impact or discrimination, please outline this below. State whether it is justifiable or legitimate and give reasons. |
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NB:

- i. If you have identified adverse impact or discrimination that is **illegal**, you are required to take action to remedy this immediately.
- ii. If you have identified adverse impact or discrimination that is **justifiable or legitimate**, you will need to consider what actions can be taken to mitigate its effect on those groups of people.

- | | |
|------------|---|
| 22. | <p>Where there are potential barriers, negative impacts identified and/ or barriers or impacts are unknown, please outline how you propose to minimise all negative impact or discrimination.</p> <ol style="list-style-type: none"> a) include any relevant research and consultation findings which highlight the best way in which to minimise negative impact or discrimination b) consider what barriers you can remove, whether reasonable adjustments may be necessary and how any unmet needs that you have identified can be addressed c) if you are not addressing any negative impacts (including human rights) or potential barriers identified for a particular group, please explain why |
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Section 3 D: Making a decision	
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| 23. | Summarise your findings and give an overview as to whether the policy will meet Leicestershire County Council's responsibilities in relation to equality, diversity, community cohesion and human rights. |
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Section 3 E: Monitoring, evaluation & review of the policy	
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| 24. | Are there processes in place to review the findings of this EHRIA and make appropriate changes? In particular, how will you monitor potential barriers and any positive/ negative impact? |
| 25. | How will the recommendations of this assessment be built into wider planning and review processes?
<i>e.g. policy reviews, annual plans and use of performance management systems</i> |

Section 3:
F: Equality and human rights improvement plan

Please list all the equality objectives, actions and targets that result from the Equality and Human Rights Impact Assessment (EHRIA) (continue on separate sheets as necessary). These now need to be included in the relevant service plan for mainstreaming and performance management purposes.

Equality Objective	Action	Target	Officer Responsible	By when

Section 4: Sign off and scrutiny

Upon completion, the Lead Officer completing this assessment is required to sign the document in the section below.

It is required that this Equality and Human Rights Impact Assessment (EHRIA) is scrutinised by your Departmental Equalities Group and signed off by the Chair of the Group.

Once scrutiny and sign off has taken place, a depersonalised version of this EHRIA should be published on Leicestershire County Council's website. Please send a copy of this form to the Digital Services Team via web@leics.gov.uk for publishing.

Section 4

A: Sign Off and Scrutiny

Confirm, as appropriate, which elements of the EHRIA have been completed and are required for sign off and scrutiny.

Equality and Human Rights Assessment Screening ☒

Equality and Human Rights Assessment Report ☐

1st Authorised Signature (EHRIA Lead Officer):



Heather Pick, Assistant Director, Adults and Communities

Date:27/05/21.....

2nd Authorised Signature (DEG Chair A&C):



Nigel Thomas, Assistant Director, Adults and Communities

Date:23/06/21.....