

## Equality Impact Analysis to enable informed decisions

### The purpose of this document is to:-

- I. help decision makers fulfil their duties under the Equality Act 2010 and
- II. for you to evidence the positive and adverse impacts of the proposed change on people with protected characteristics and ways to mitigate or eliminate any adverse impacts.

### Using this form

This form must be updated and reviewed as your evidence on a proposal for a project/service change/policy/commissioning of a service or decommissioning of a service evolves taking into account any consultation feedback, significant changes to the proposals and data to support impacts of proposed changes. The key findings of the most up to date version of the Equality Impact Analysis must be explained in the report to the decision maker and the Equality Impact Analysis must be attached to the decision making report.

**\*\*Please make sure you read the information below so that you understand what is required under the Equality Act 2010\*\***

### Equality Act 2010

The Equality Act 2010 applies to both our workforce and our customers. Under the Equality Act 2010, decision makers are under a personal duty, to have due (that is proportionate) regard to the need to protect and promote the interests of persons with protected characteristics.

### Protected characteristics

The protected characteristics under the Act are: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

### Section 149 of the Equality Act 2010

Section 149 requires a public authority to have due regard to the need to:

- Eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by/or under the Act
- Advance equality of opportunity between persons who share relevant protected characteristics and persons who do not share those characteristics
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The purpose of Section 149 is to get decision makers to consider the impact their decisions may or will have on those with protected characteristics and by evidencing the impacts on people with protected characteristics decision makers should be able to demonstrate 'due regard'.

### **Decision makers duty under the Act**

Having had careful regard to the Equality Impact Analysis, and also the consultation responses, decision makers are under a personal duty to have due regard to the need to protect and promote the interests of persons with protected characteristics (see above) and to:-

- (i) consider and analyse how the decision is likely to affect those with protected characteristics, in practical terms,
- (ii) remove any unlawful discrimination, harassment, victimisation and other prohibited conduct,
- (iii) consider whether practical steps should be taken to mitigate or avoid any adverse consequences that the decision is likely to have, for persons with protected characteristics and, indeed, to consider whether the decision should not be taken at all, in the interests of persons with protected characteristics,
- (iv) consider whether steps should be taken to advance equality, foster good relations and generally promote the interests of persons with protected characteristics, either by varying the recommended decision or by taking some other decision.

## **Conducting an Impact Analysis**

The Equality Impact Analysis is a process to identify the impact or likely impact a project, proposed service change, commissioning, decommissioning or policy will have on people with protected characteristics listed above. It should be considered at the beginning of the decision making process.

### **The Lead Officer responsibility**

This is the person writing the report for the decision maker. It is the responsibility of the Lead Officer to make sure that the Equality Impact Analysis is robust and proportionate to the decision being taken.

### **Summary of findings**

You must provide a clear and concise summary of the key findings of this Equality Impact Analysis in the decision making report and attach this Equality Impact Analysis to the report.

## Impact – definition

An impact is an intentional or unintentional lasting consequence or significant change to people's lives brought about by an action or series of actions.

### How much detail to include?

The Equality Impact Analysis should be proportionate to the impact of proposed change. In deciding this asking simple questions “Who might be affected by this decision?” “Which protected characteristics might be affected?” and “How might they be affected?” will help you consider the extent to which you already have evidence, information and data, and where there are gaps that you will need to explore. Ensure the source and date of any existing data is referenced.

You must consider both obvious and any less obvious impacts. Engaging with people with the protected characteristics will help you to identify less obvious impacts as these groups share their perspectives with you.

A given proposal may have a positive impact on one or more protected characteristics and have an adverse impact on others. You must capture these differences in this form to help decision makers to arrive at a view as to where the balance of advantage or disadvantage lies. If an adverse impact is unavoidable then it must be clearly justified and recorded as such, with an explanation as to why no steps can be taken to avoid the impact. Consequences must be included.

Page 297

**Proposals for more than one option** If more than one option is being proposed you must ensure that the Equality Impact Analysis covers all options. Depending on the circumstances, it may be more appropriate to complete an Equality Impact Analysis for each option.

**The information you provide in this form must be sufficient to allow the decision maker to fulfil their role as above. You must include the latest version of the Equality Impact Analysis with the report to the decision maker. Please be aware that the information in this form must be able to stand up to legal challenge.**

## Background Information

<b>Title of the policy / project / service being considered</b>	Future of the Heritage Service	<b>Person / people completing analysis</b>	Heritage Service supported by the Community Engagement team
<b>Service Area</b>	Environment & Economy	<b>Lead Officer</b>	Chief Community Engagement Officer, Economy & Environment Directorate
<b>Who is the decision maker?</b>	Executive	<b>How was the Equality Impact Analysis undertaken?</b>	Desktop meeting between Heritage Service and Community Engagement Team
<b>Date of meeting when decision will be made</b>	08/05/2019	<b>Version control</b>	V0.19
<b>Is this proposed change to an existing policy/service/project or is it new?</b>	Existing policy/service/project	<b>LCC directly delivered, commissioned, re-commissioned or de-commissioned?</b>	Directly delivered
<b>Describe the proposed change</b>	<p>The Council is considering changes to its Heritage Service, which if implemented would involve changes to its offer including the closure or handing over of a number of sites, and the development of the heritage offer at Lincoln Castle and The Collection Art &amp; Archaeology Museum. And considering how it can be made more financially sustainable for the longer term.</p> <p>The current Heritage Service consists mainly of microsites, with the exception of Lincoln Castle, which can already be seen as a supersite. Microsites are defined as a museum, gallery or heritage site which offers access to a single narrative through a highly specialized collection. This single narrative doesn't provide significant appeal for return visits and so leads to restricted development of the site and the offer and any prospect for increasing income is limited.</p> <p>The current Heritage Service already has one supersite, at Lincoln Castle. Supersites are defined as a heritage site, gallery or museum that offers multiple experiences, including both permanent and temporary exhibitions and events,</p>		

which enables the broadest range of audiences to engage with the widest range of experiences, and which maximizes the potential for commercial return.

The service believes that this does encourage return visits and increases the potential for income generation and so reduces the investment required by LCC. Lincoln Castle has already shown this by generating a net surplus and has attracted national profile exhibitions such as the Poppies Wave, as well as becoming the first venue outside of London to showcase the Domesday Book.

The service believes that investment at The Collection to create a second supersite would also improve the financial viability of the site by becoming more audience focused through listening to what our audiences tell us and would enable replacement of the existing permanent exhibition which is now 15 years old to display more appropriate collections of art, archaeology, natural and social history as well as provide more flexible space enhancing the temporary exhibitions programme.

The service believes that the operation of two supersites would be supported further by the retention of three microsites which tell unique stories of Lincolnshire as well as support the cultural enterprise model. These are BBMF, Heckington Windmill and MLL.

The development of supersites under the cultural enterprise model seeks to improve the visitor experience across the service, providing a more modern, responsive and relevant heritage service, telling a diverse range of stories and offering a range of heritage experiences that aims to enrich the cultural experience of residents of and visitors to Lincolnshire. This model is also considered to support wider income generation opportunities which are not currently available. LCC's contribution to the running of the Heritage Service in 2018/19 will be approximately £960,000, Current forecasts are that the adoption of the plans which we're consulting about would reduce this figure to approximately £222,000 in 2023/24.

### **Lincoln Castle**

Lincoln Castle requires a number of changes to ensure it can perform successfully as a supersite and drive the overall growth of the Heritage Service. These changes would see office and learning spaces in the prison block freed up to create more flexible exhibition and event space, while also making better use of the Heritage Skills Centre as a dedicated learning center for all, rather than just for traditional craft skills for a very small niche.

### **The Collection Art & Archaeology Museum in Lincolnshire**

The proposal is to create a The Collection Museum and Art Gallery (CMAG) supersite at The Collection building which would display the best of our art and archaeology collections, telling a much more refined and engaging story about the history of Lincoln and/or Lincolnshire.

### **The Collection**

To create a new Supersite at The Collection Museum & Art Gallery we propose a number of changes that would significantly alter how we use that space in order to improve and diversify the visitor experience and maximise income generation opportunities. To create the CMAG Supersite we propose a range of changes that would reinvent the museum experience completely. The basement would become a 'white cube' gallery to house the Usher art collection, the main gallery would be reconfigured to create a larger temporary and a smaller permanent gallery, and a smaller range of physical changes would help to re-energise the museum. We also propose to retain control of the café operation which is currently operated by Stokes.

### **Usher Gallery**

The building is leased by LCC from City of Lincoln Council and around 45% of the art in the collection is owned by City of Lincoln Council with the remainder being loaned to or owned by LCC. The Heritage Service proposes to close the Usher as a gallery but for it to remain within LCC as it could potentially be used by other departments with a public-facing role. This would require a renegotiation of the lease with City of Lincoln Council, but it's likely that some art would still be displayed. However, the art collection itself would be displayed in The Collection Museum & Gallery Supersite.

### **Gainsborough Old Hall**

The proposal is to not renew the lease and to return the operation of Gainsborough Old Hall to its owner, English Heritage. This site would no longer be part of the LCC Heritage service. English Heritage owns the building and LCC currently manages the attraction via a lease agreement which has a one year break clause in 2019. The building is of national architectural significance and English Heritage, as the national body who have the remit to preserve and present the architectural treasures, are therefore best placed to interpret and showcase its history upon activation of the break clause in 2019 which will then come into effect in 2020. After activation of the break clause, the operation of this attraction at Gainsborough Old Hall, including the opening hours, event and exhibition programmes and facilitated learning programme would be determined by English Heritage.

### **Discover Stamford**

The proposal is to explore opportunities to engage with a third party who has expressed an interest in the social history collections currently contained within Discover Stamford (which consist of the museum display at Stamford Library and the Stamford store) to display them in their own buildings for public access. This would mean the current sites would close as public attractions and the collections display would be provided by a third party at a new site. If the collection was not transferred to a third party, LCC would close the attractions and would no longer be part of the LCC Heritage Service.

**Ellis Mill**

The proposal is to explore the transfer of ownership and/or full operational responsibility for the mill to a third party. Any transfer of ownership would include transfer of the existing covenant covering its use as a mill. If we cannot transfer the ownership or lease the mill, the proposal is that the site would close as a public attraction and would not be part of the LCC Heritage Service.

**Burgh le Marsh Mill**

The proposal is to explore the transfer of ownership and/or full operational responsibility for the mill to a third party. If we cannot transfer the ownership or lease the mill the proposal is that the site would close as a public attraction and would not be part of the LCC Heritage Service.

**Alford Mill**

The proposal is to explore the transfer of ownership and/or full operational responsibility for the mill to a third party. If we cannot transfer the ownership or lease the mill the proposal is that the site would close as a public attraction and would not be part of the LCC Heritage Service.

### **Evidencing the impacts**

In this section you will explain the difference that proposed changes are likely to make on people with protected characteristics. To help you do this first consider the impacts the proposed changes may have on people without protected characteristics before then considering the impacts the proposed changes may have on people with protected characteristics.

You must evidence here who will benefit and how they will benefit. If there are no benefits that you can identify please state 'No perceived benefit' under the relevant protected characteristic. You can add sub categories under the protected characteristics to make clear the impacts. For example under Age you may have considered the impact on 0-5 year olds or people aged 65 and over, under Race you may have considered Eastern European migrants, under Sex you may have considered specific impacts on men.

### **Data to support impacts of proposed changes**

When considering the equality impact of a decision it is important to know who the people are that will be affected by any change.

#### Population data and the Joint Strategic Needs Assessment

The Lincolnshire Research Observatory (LRO) holds a range of population data by the protected characteristics. This can help put a decision into context. Visit the LRO website and its population theme page by following this link: <http://www.research-lincs.org.uk> If you cannot find what you are looking for, or need more information, please contact the LRO team. You will also find information about the Joint Strategic Needs Assessment on the LRO website.

#### Workforce profiles

You can obtain information by many of the protected characteristics for the Council's workforce and comparisons with the labour market on the [Council's website](#). As of 1<sup>st</sup> April 2015, managers can obtain workforce profile data by the protected characteristics for their specific areas using Agresso.

### Positive impacts

The proposed change may have the following positive impacts on persons with protected characteristics – If no positive impact, please state 'no positive impact'.

<b>Age</b>	<p>Work to both Lincoln Castle and the Collection building would be consistent with the Council's obligations to ensure accessibility to its buildings. It also allows improvements to be considered which would give greater access to the interpretation of the collections through, for instance, audio guides.</p> <p>The increased scope for flexibility of display and the attraction of temporary and touring exhibitions gives greater scope for tailoring the Heritage offer to the interests and experiences of different groups including different age groups. The increased capacity to incorporate different narratives alongside the core offer has the potential to advance equality of opportunity and foster good relations in relation to people with a protected characteristic including age.</p>
<b>Disability</b>	<p>Work to both Lincoln Castle and the Collection building would be consistent with the Council's obligations to ensure accessibility to its buildings. It also allows improvements to be considered which would give greater access to the interpretation of the collections through, for instance, audio guides.</p> <p><b>Evidence:</b> Anecdotal evidence suggests that access <b>may</b> even be improved with Investment in Lincoln Castle to redevelop existing spaces currently used for learning and utilising the Heritage Skills Centre.</p> <p>The increased scope for flexibility of display and the attraction of temporary and touring exhibitions gives greater scope for tailoring the Heritage offer to the interests and experiences of different groups including people with a disability. The increased capacity to incorporate different narratives alongside the core offer has the potential to advance equality of opportunity and foster good relations in relation to people with a protected characteristic including disability. .</p>
<b>Gender reassignment</b>	<p>The increased scope for flexibility of display and the attraction of temporary and touring exhibitions at Lincoln Castle and the Collection Museum and Art Gallery gives greater scope for tailoring the Heritage offer to the interests and experiences of different groups including people considering, undergoing or who have undergone gender reassignment. The increased capacity to incorporate different narratives alongside the core offer has the potential to advance equality of opportunity and foster good relations in relation to people with a protected characteristic including gender reassignment.</p>
<b>Marriage and civil partnership</b>	<p>The increased scope for flexibility of display and the attraction of temporary and touring exhibitions at Lincoln Castle and the Collection Museum and Art Gallery gives greater scope for tailoring the Heritage offer to the interests and experiences of different groups including people who share this protected characteristic. The increased capacity to incorporate different narratives alongside the core offer has the potential to advance equality of opportunity and foster good relations in relation to people with a protected characteristic including marriage and civil partnership. .</p>

<b>Pregnancy and maternity</b>	<p>The increased scope for flexibility of display and the attraction of temporary and touring exhibitions at Lincoln Castle and the Collection Museum and Art Gallery gives greater scope for tailoring the Heritage offer to the interests and experiences of different groups including people who share this protected characteristic. The increased capacity to incorporate different narratives alongside the core offer has the potential to advance equality of opportunity and foster good relations in relation to people with a protected characteristic including pregnancy and maternity.</p>
<b>Race</b>	<p>Work to both Lincoln Castle and the Collection allows improvements to be considered which would give greater access to the interpretation of the collections through, for instance, audio guides.</p> <p><b>Evidence:</b> Anecdotal evidence suggests that there are a number of visitors to Heritage sites from different racial backgrounds whose first language is not English.</p> <p><b>Impact:</b> This provides an opportunity to enhance language/translation (including Audio Guides) services at the newly developed site that might make it more appealing and accessible to visitors/tourists/students and migrant communities who are visiting or are new to Lincolnshire. This might in turn attract a more international audience (diverse cohort of visitors), reduce social isolation, increase wellbeing and enhance the experience of all visitors.</p> <p>The increased scope for flexibility of display and the attraction of temporary and touring exhibitions at Lincoln Castle and the Collection Museum and Art Gallery gives greater scope for tailoring the Heritage offer to the interests and experiences of different groups including people of different races. The increased capacity to incorporate different narratives alongside the core offer has the potential to advance equality of opportunity and foster good relations in relation to people with a protected characteristic including race.</p>
<b>Religion or belief</b>	<p>Insofar as people having a particular religion or belief may also share the protected characteristic of race, the evidence and impacts set out in the preceding box will apply.</p> <p>The increased scope for flexibility of display and the attraction of temporary and touring exhibitions at Lincoln Castle and the Collection Museum and Art Gallery gives greater scope for tailoring the Heritage offer to the interests and experiences of different groups including people of different religions or beliefs. The increased capacity to incorporate different narratives alongside the core offer has the potential to advance equality of opportunity and foster good relations in relation to people with a protected characteristic including religion and belief.</p>
<b>Sex</b>	<p>The increased scope for flexibility of display and the attraction of temporary and touring exhibitions at Lincoln Castle and the Collection Museum and Art Gallery gives greater scope for tailoring the Heritage offer to the interests and experiences of different groups including people who share this protected characteristic. The increased capacity to incorporate different narratives alongside the core offer has the potential to advance equality of opportunity and foster good relations in relation to people with a protected characteristic including sex.</p>

<b>Sexual orientation</b>	The increased scope for flexibility of display and the attraction of temporary and touring exhibitions at Lincoln Castle and the Collection Museum and Art Gallery gives greater scope for tailoring the Heritage offer to the interests and experiences of different groups including people who share this protected characteristic. The increased capacity to incorporate different narratives alongside the core offer has the potential to advance equality of opportunity and foster good relations in relation to people with a protected characteristic including sexual orientation.

**If you have identified positive impacts for other groups not specifically covered by the protected characteristics in the Equality Act 2010 you can include them here if it will help the decision maker to make an informed decision.**

**Rural Isolation/wellbeing:** This gives an opportunity to consider and review opening hours, which might attract more visitors and volunteers to the sites, reduce social isolation and increase wellbeing. If the Windmills are to transfer over to a community collective, this may improve the social fabric of the community by people coming together for community ownership. .

Page 305

**Adverse/negative impacts**

You must evidence how people with protected characteristics will be adversely impacted and any proposed mitigation to reduce or eliminate adverse impacts. An adverse impact causes disadvantage or exclusion. If such an impact is identified please state how, as far as possible, it is justified; eliminated; minimised or counter balanced by other measures.

If there are no adverse impacts that you can identify please state 'No perceived adverse impact' under the relevant protected characteristic.

**Negative impacts of the proposed change and practical steps to mitigate or avoid any adverse consequences on people with protected characteristics are detailed below. If you have not identified any mitigating action to reduce an adverse impact please state 'No mitigating action identified'.**

<b>Age</b>	<p>Reducing the opening times or closing any sites would impact on the accessibility of attractions and potentially require some people to travel further distances to access a particular type of heritage experience, particularly windmills. This is likely to disproportionately impact on older and younger people who may use facilities as form of social activity and find it more difficult to travel thereby potentially impacting on isolation or wellbeing, especially those who may already experience travel challenges in rural areas of Lincolnshire.</p> <p>There may be a reduction in educational provision for young people depending on what English Heritage provide if it takes over direct management of Gainsborough Old Hall.</p>
<b>Disability</b>	<p>Reducing the opening times or closing any sites would impact on the accessibility of attractions and potentially require some people to travel further distances to access a particular type of heritage experience, particularly windmills. This is likely to disproportionately impact on people with a disability who may use facilities as form of social activity and find it more difficult to travel thereby potentially impacting on isolation or wellbeing, especially those who may already experience travel challenges in rural areas of Lincolnshire</p> <p>There may be a reduction in educational provision for young people with special educational needs or a disability depending on what English Heritage provide if it takes over direct management of Gainsborough Old Hall.</p>
<b>Gender reassignment</b>	<p>No perceived adverse impact'</p>

<b>Marriage and civil partnership</b>	No perceived adverse impact'
<b>Pregnancy and maternity</b>	Reducing the opening times or closing any sites would impact on the accessibility of attractions and potentially require some people to travel further distances to access a particular type of heritage experience, particularly windmills. This is likely to disproportionately impact on pregnant women or women with very young children who may use facilities as form of social activity and find it more difficult to travel thereby potentially impacting on isolation or wellbeing, especially those who may already experience travel challenges in rural areas of Lincolnshire.
<b>Race</b>	No perceived adverse impact'
<b>Religion or belief</b>	No perceived adverse impact'
<b>Sex</b>	Reducing the opening times or closing any sites would impact on the accessibility of attractions and potentially require some people to travel further distances to access a particular type of heritage experience, particularly windmills. This is considered likely to disproportionately impact on women who may be expected to be disproportionately likely to be carers or have primary responsibility for children. They may use facilities as form of social activity and find it more difficult to travel thereby potentially impacting on isolation or wellbeing, especially those who may already experience travel challenges in rural areas of Lincolnshire.
<b>Sexual orientation</b>	No perceived adverse impact'

**If you have identified negative impacts for other groups not specifically covered by the protected characteristics under the Equality Act 2010 you can include them here if it will help the decision maker to make an informed decision.**

**Rural isolation/wellbeing:** Reducing the opening times or closing any sites may impact on people who may use facilities as form of social activity, thereby potentially impacting on isolation or wellbeing, especially those who may already experience travel challenges in rural areas of Lincolnshire. .

## Stakeholders

Stake holders are people or groups who may be directly affected (primary stakeholders) and indirectly affected (secondary stakeholders)

You must evidence here who you involved in gathering your evidence about benefits, adverse impacts and practical steps to mitigate or avoid any adverse consequences. You must be confident that any engagement was meaningful. The Community engagement team can help you to do this and you can contact them at [consultation@lincolnshire.gov.uk](mailto:consultation@lincolnshire.gov.uk)

State clearly what (if any) consultation or engagement activity took place by stating who you involved when compiling this EIA under the protected characteristics. Include organisations you invited and organisations who attended, the date(s) they were involved and method of involvement i.e. Equality Impact Analysis workshop/email/telephone conversation/meeting/consultation. State clearly the objectives of the EIA consultation and findings from the EIA consultation under each of the protected characteristics. If you have not covered any of the protected characteristics please state the reasons why they were not consulted/engaged.

## Objective(s) of the EIA consultation/engagement activity

The objective is to test assumptions about the likely impact Heritage Service changes would have on people with protected characteristics. These assumptions were made during the initial development of the EIA and will be updated in response to stakeholder feedback and evidence.

**Who was involved in the EIA consultation/engagement activity? Detail any findings identified by the protected characteristic**

<b>Age</b>	To be conducted at the next stage of the process
<b>Disability</b>	To be conducted at the next stage of the process
<b>Gender reassignment</b>	To be conducted at the next stage of the process
<b>Marriage and civil partnership</b>	To be conducted at the next stage of the process
<b>Pregnancy and maternity</b>	To be conducted at the next stage of the process
<b>Race</b>	To be conducted at the next stage of the process
<b>Religion or belief</b>	To be conducted at the next stage of the process

<b>Sex</b>	To be conducted at the next stage of the process
<b>Sexual orientation</b>	To be conducted at the next stage of the process
<b>Are you confident that everyone who should have been involved in producing this version of the Equality Impact Analysis has been involved in a meaningful way?</b> The purpose is to make sure you have got the perspective of all the protected characteristics.	Yes at this stage – however this document will be revisited during consultation and updated as appropriate. It will be revisited after the consultation ends and updated as appropriate. There will also be test groups invited to comment on and enhance this EIA..
<b>Once the changes have been implemented how will you undertake evaluation of the benefits and how effective the actions to reduce adverse impacts have been?</b>	If the proposal is approved and changes are made, outcomes will be evaluated with representative groups.

## Further Details

**Are you handling personal data?**

No

If yes, please give details.

**Actions required**

Include any actions identified in this analysis for on-going monitoring of impacts.

**Action**

To arrange EIA test meeting with protected characteristic groups

**Lead officer**

Community Engagement Team

**Timescale**

During consultation

Version	Description	Created/amended by	Date created/amended	Approved by	Date approved
V0.19	Version v0.19 EIA – Future of the Heritage Service	Heritage Service supported by the Community Engagement team and legal team	03 01 2019	Chief Community Engagement Officer, Economy & Environment Directorate	

**Examples of a Description:**

'Version issued as part of procurement documentation'

'Issued following discussion with community groups'

'Issued following requirement for a service change; Issued following discussion with supplier'