

Equality impact assessment form

Directorate	Corporate Resources
Service area	Property
Proposal	Relocation of the Derby Deaf Club and British Deaf Association from the Rycote Centre
Reason for proposal	To facilitate the closure of an under-performing property asset in order to achieve MTPF savings
Sign off (Director/Head of Service)	Jayne Sowerby-Warrington, Head of Estates & Property Review
Date of assessment	18 th January 2022 (revisions 24 th June 2022 and 19 th July 2022)

Please read the support notes to help you in Appendix 1 before completing your assessment

The form

You need to attach the completed form to any report to help councillors and colleagues make their decisions by taking equality implications into account.

The assessment team or name of individual completing this form

Team leader's name and job title – Jayne Sowerby-Warrington, Head of Estates & Property Review

Other team members if appropriate

Name	Job title	Organisation	Area of expertise
John Sadler	Strategic Asset Manager	Derby City Council	Strategic Asset Management
Steve Race	Asset Surveyor	Derby City Council	Property Asset Management
Ann Webster	Equality & Diversity Lead	Derby City Council	Equality & Diversity
Robin Ash	BSL Equality and Rights Coordinator	British Deaf Association	Deaf Equality

Step 1- setting the scene

Make sure you have clear aims and objectives on what you are impact assessing – this way you keep to the purpose of the assessment and are less likely to get side- tracked.

1. What are the main aims, objectives, and purpose of the decision you want to make?	The relocation of the Derby Deaf Club and British Deaf Association (along with associated sessional users of the Deaf Club accommodation) from the Rycote Centre into alternative premises.
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2. Why do you need to make this decision?	<p>Until recently, these services have been delivered from the Rycote Centre, Parker Street, Derby, which is an under-performing asset and is no longer fit for purpose. Its primary user, the Derby Adult Learning Service, has now moved to alternative premises, and it is not feasible to retain the property for the Deaf Club and BDA.</p> <p>The Rycote Centre was constructed in the early 1970's as a Resource Centre for disabled people with a variety of impairments. Owing to its age and construction, it is expensive to maintain, with high running costs. It is not financially viable to refurbish the building to meet current requirements.</p>
3. Who delivers/will deliver the changed service/policy including any consultation on it and any outside organisations who deliver under procurement arrangements?	The Property Service (Corporate Resources) is responsible for managing the relocation of the users (and the eventual closure) of the Rycote Centre.
4. Who are the main customers, users, partners, colleagues, or groups affected by this decision?	The Derby Deaf Club, British Deaf Association (BDA) and the wider Deaf community are affected by this decision. The Council's Deaf Service and Integrated Disabled Children's Service also ran sessional groups from the Deaf Club's accommodation.

Step 2 – collecting information and assessing impact

5. Who have you consulted and engaged with so far about this change, and what did they tell you? Who else do you plan to consult with? – tell us here how you did this consultation and how you made it accessible for the equality groups, such as accessible locations, interpreters and translations, accessible documents.	<p>Consultation has been undertaken by John Sadler, Strategic Asset Manager, and Steve Race, Asset Surveyor, with representatives of the Deaf Club trustees and the BDA. These consultations have been undertaken at online and in-person meetings, with a British Sign Language (BSL) interpreter present at each meeting. Online meetings have also taken place with representatives of the DCC Deaf Service and Integrated Disabled Children's Service.</p> <p>A fact sheet was provided setting out the reasons for the proposed relocation, to enable the Deaf Club to consult its trustees and the wider Deaf community. This was supported by a BSL-signed video which enabled the Deaf Club to reach a wider audience via social media. The proposals also featured on the BBC2 magazine programme "See, Hear" on 3rd November 2021.</p>
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	<p>All groups have also regularly been consulted by email, and ongoing liaison is continuing as part of the relocation process.</p> <p>The groups told us they understood why this relocation was necessary and agreed to work with the Council to achieve the desired outcomes. They indicated that they require premises which are as close to the City Centre as possible, fully accessible, multi-functional, affordable, and deaf-friendly.</p> <p>They acknowledged that it was unlikely that all their requirements would be met from one property, and that they may need to hire premises (such as church halls or community centres) for their larger events.</p> <p>A priority was the co-location of the Deaf Club and BDA in order to maintain links with each other and the wider deaf community.</p>
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6. Using the skills and knowledge in your assessment team or what you know yourself, and from any consultation you have done, what do you already know about the equality impact of the proposed change on particular groups? Also, use any other information you know about such as any customer feedback, surveys, national research or data. Indicate by a tick for each protected characteristic group whether this is a negative or a positive impact. Only fill in the mitigation box if you think the decision will have a negative impact and then you'll need to explain how you are going to lessen the impact.

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
Age – older and younger people	The Deaf Club accommodation has been used by all age ranges for many years now and people get used to going to the same building. The building is no longer fit for purpose and new premises have been identified in the vicinity of the Rycote Centre, so the area is familiar to the user groups.	No		Some older members of the Deaf Community may find it worrying to move to different premises, even though it is in the vicinity of the Rycote Centre. However, it is all on one level and has better access for older people. Hopefully after a few meetings there, older Deaf people will grow more confident in using the new premises with the support of the Deaf Community.
	The disabled children's integrated youth club also previously used the Rycote Centre and has now relocated to Derby Quad.	Yes		

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
Disability – the effects on the whole range of disabled people, including Deaf people, hearing impaired people, visually impaired people, people with mental health issues, people with learning difficulties, people living with autism and people with physical impairments	<p>Derby Deaf Club, British Deaf Association, Deaf Forum, Deaf Service men's and women's groups and the integrated disabled children's youth club all used the Rycote Centre building. However, the building did not have very good access for disabled people, despite its origins. There was no up to date unisex accessible toilet. There was a cubicle in the men's and women's toilets that served as disabled people's toilets, but not to current standards. There were also issues around emergency evacuation as the Deaf Club was upstairs, so limiting for wheelchair users and older people.</p> <p>There were challenges when people came to the door at night to visit the Deaf Club as the flashing lights were not always in the best location to alert Deaf people upstairs that the door bell was ringing.</p> <p>The new accommodation is on one level, will have accessible visual emergency alarms, and is accessible for wheelchair users. There will be security lights on a sensor/timer, the windows will have privacy film on them to avoid having to close the blinds and a fire risk assessment will be undertaken by the groups before moving in.</p> <p>Representatives of the Deaf community have visited the new premises on several occasions, are happy with it, and are involved in ensuring that it meets their needs.</p>	Yes		
	<p>However, the Deaf Community feel moving will have a negative financial impact on them, such the costs of hiring out larger meeting places.</p>	No		A Derby Homes Community Room is available in the vicinity of the Rycote Centre for charities to book at no cost

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
Gender identity - trans and those people who don't identify with a particular gender, for example, non-binary, genderfluid, genderqueer, polygender and those who are questioning their gender or non-gendered identity.	Derby's Deaf community is very diverse and so any new accommodation needs to meet the needs of trans people with appropriate unisex toilet provision	Yes		
Marriage and Civil Partnership	Not applicable			
Pregnancy and maternity - women who are pregnant or who have recently had a baby, including breast feeding mothers	No specific issues have been identified.			
Race - the effects on minority ethnic communities, including newer communities, Gypsies and Travellers and the Roma community	Derby's Deaf Community is diverse with members from the Black, Asian and Minority Ethnic Communities The new accommodation is in the same area as the Rycote Centre where Deaf people feel safe and there will be added security lights on a sensor/timer.	Yes		
Religion or belief or none - the effects on religious and cultural communities, customers, and colleagues	Derby's Deaf Community is diverse with a range of religion and beliefs and those with none amongst its many members. The change of accommodation is unlikely to have an impact, apart from better accommodation.	Yes		
Sex - the effects on both men and women and boys and girls	The Men's Group and Women's Group met at the Rycote Centre and will continue to meet at the new premises, which will provide better accommodation, with external security lights on a sensor/timer for safety.	Yes		
Sexual orientation - the effects on lesbians, gay men, bisexuals, pansexual, asexual and those questioning their sexuality	Derby's Deaf Community is very diverse and there is a Deaf LGBTQ+ community. The new	Yes		

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
	accommodation will be better than before with external security lights on a sensor/timer for safety.			

Important - For any of the equality groups you don't have any information about, then please contact our Lead on Equality and Diversity for help. You can also get lots of information on reports completed from organisations' websites such as the Equality and Human Rights Commission, Stonewall, Press for Change, Joseph Rowntree Trust and so on. Please don't put down that the impact affects 'everyone the same' – it never does!

Step 3 – deciding on the outcome

7 What outcome does this assessment suggest you take? – You might find more than one applies. Please also tell us why you have come to this decision?

Outcome 1		No major change needed – the EIA hasn't identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken
Outcome 2		Adjust the proposal to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?
Outcome 3	Yes	Continue the proposal despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are: <ul style="list-style-type: none"> • sufficient plans to stop or minimise the negative impact • mitigating actions for any remaining negative impacts • plans to monitor the actual impact.
Outcome 4		Stop and rethink the proposal when the EIA shows actual or potential unlawful discrimination

Why did you come to this decision?

For many reasons this Equality Impact Assessment has highlighted a positive effect on Deaf people as the Rycote Centre building was not fit for purpose. The Council has worked with the Deaf Community right from the start to identify new accommodation which is more suitable for Deaf people with additional impairments such as Deaf wheelchair users. The Council is supporting the Deaf Community in locating to their new home and they are grateful to Council colleagues for their efforts. However, the Deaf Community feel that it needs to be recognised in this Equality Impact Assessment that not everything is positive and so should have **Outcome 3**.

During Covid lockdowns the Deaf Community were unable to use the Rycote Centre due to the government restrictions in place at the time which has had a negative impact on their well-being. The new accommodation is smaller than that Deaf Club space at the Rycote Centre. Whilst it is suitable for smaller meetings, if a larger space is needed for a particular event, then the Deaf Community have advised that they will hire premises, such as community rooms, community centres or church halls. This will be an added cost them, although may be more cost-effective in the longer term as they will only hire the space as they need it, rather than paying to occupy larger accommodation all of the time.

However, this is another reason why the Deaf Community feel this Equality Impact Assessment should have outcome 3.

If you have decided on **Outcome 3**, then please tell us here the justification for continuing with the proposal. You also need to make sure that there are actions in the Mitigation Box to lessen the effect of the negative impact. This is so important and may face a legal challenge in the future.

The Rycote Centre is an under-performing building that is no longer fit for purpose, and the Deaf Club remains its only occupier. The Council cannot continue to retain this asset for the benefit of a single occupier. We will continue to work with, and support, the Deaf Club and BDA with their relocation and ensure that the new premises are suitable for use by the Deaf Community.

If you have decided on **Outcome 4** then if the proposal continues, without any mitigating actions, it may be likely that we will face a legal challenge and possibly a Judicial Review on the process - it is so important that the equality impact assessment is done thoroughly, as this is what the Judge will consider

Appendix 1

Equality impact assessment form– please read this section first before you do the assessment

This is our equality impact assessment form to help you equality check what you are doing when you are about to produce a new policy, review an older one, write a strategy or plan or review your services and functions. In fact, you need to do an equality impact assessment whenever a decision is needed about our services and functions that affects people and **before** that decision is made. This also includes quick Covid 19 related decisions.

We use the term 'policy' as shorthand on this form for the full range of policies, practices, plans, reviews, activities and procedures.

Policies will usually fall into three main categories...

- Organisational policies and functions, such as recruitment, complaints procedures, re-structures.

- Key decisions such as allocating funding to voluntary organisations, budget setting.
- Policies that set criteria or guidelines for others to use, such as criteria about school admissions, procurement methods, disabled facilities grants, on street parking bays.

So why do we need to do equality impact assessments? Although the law does not require us to do them now, the courts still place significant weight on the existence of some form of documentary evidence of compliance with the **Public Sector Equality Duty** when determining judicial review cases. This method helps us to make our decisions fairly, taking into account any equality implications, so yes, we still need to complete them.

The Public Sector Equality Duty is part of the Equality Act 2010 and this Duty requires us as a public body to have ‘**due regard**’ to eliminating discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act. It requires us to advance equality of opportunity and foster good relations between people who share a ‘**relevant protected characteristic**’ and people who don’t. The nine protected characteristics are age, disability, gender identity, marriage and civil partnership, pregnancy and maternity, race religion and belief, sex and sexual orientation.

Having ‘due regard’ means:

- removing or minimising disadvantages suffered by people due to their protected characteristics
- taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people
- encouraging people with certain protected characteristics to participate in public life or in other activities where the participation is disproportionately low.

This completed form should be attached to any Corporate Leadership, Senior Leadership, Cabinet or Personnel Committee report to help decision makers take the equality implications into account when they make the decision. Equality impact assessments **must be done before** decisions are made.

You’ll find that completing these assessments will help you to:

- understand your customers’ and communities needs
- develop service improvements
- improve service satisfaction
- demonstrate that you have been fair and open and considered equality when working on re-structuring
- make sure you pay due regard to the requirements of the Public Sector Equality Duty.

Unless this is a quick Covid 19 decision, don't do the form by yourself. Get a small team together and make sure you include key people in the team such as representatives from our Equality Hubs and Forums and employee networks and you could invite trade union representatives too – the more knowledge around the table the better. You also need to decide how and who you will consult with to help inform the equality impact assessment. Our Lead on Equality and Diversity can help with useful contacts – we have a team of people who are used to doing these assessments and can help with information on barriers facing particular groups and remedies to overcome these barriers.

You'll need to pull together all the information you can about how what you are assessing affects different groups of people and then examine this information to check whether some people will be negatively or positively affected. Then you'll need to look at ways of lessening any negative effects or making the service more accessible – this is where your assessment team is very useful and you can also use the wider community. Against every negative impact you will need to complete the mitigation section to explain how you will lessen the impact.

Agree an equality action plan with your assessment team, setting targets for dealing with any negative effects or gaps in information you may have found. Set up a way of monitoring these actions to make sure they are done and include them in your service business plans.

Remember, we need to complete these assessments as part of our everyday business, so we get our equality responsibilities right and stay within the law – Equality Act 2010. If in doubt – it's better and safer to do an Equality Impact Assessment than not to bother! You never know when we may get a legal challenge and someone applies for Judicial Review.

When you have completed the assessment, get it signed by your Head of Service or Service Director and **send it to our Lead on Equality and Diversity for checking and to publish on our website**. It is a public document so must not contain any jargon and must be easy to understand.

Contact for help

Ann Webster – Lead on Equality and Diversity
ann.webster@derby.gov.uk
Tel 01332 643722 mobile 07812301144
[Sign Language Service](#)

We can give you this information in any other way, style or language that will help you access it. Please contact us on **01332 643722, 07812301144** or **derby.gov.uk/signing-service/**

Punjabi

ਇਹ ਜਾਣਕਾਰੀ ਅਸੀਂ ਤੁਹਾਨੂੰ ਕਿਸੇ ਵੀ ਹੋਰ ਤਰੀਕੇ ਨਾਲ, ਕਿਸੇ ਵੀ ਹੋਰ ਰੂਪ ਜਾਂ ਬੋਲੀ ਵਿੱਚ ਦੇ ਸਕਦੇ ਹਾਂ, ਜਿਹੜੀ ਇਸ ਤੱਕ ਪਹੁੰਚ ਕਰਨ ਵਿੱਚ ਤੁਹਾਡੀ ਸਹਾਇਤਾ ਕਰ ਸਕਦੀ ਹੋਵੇ। ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ ਇੱਥੇ ਸੰਪਰਕ ਕਰੋ: **01332 64XXXX** ਜਾਂ **derby.gov.uk/signing-service/**

Polish

Aby ułatwić Państwu dostęp do tych informacji, możemy je Państwu przekazać w innym formacie, stylu lub języku. Prosimy o kontakt: **01332 64XXXX** lub **derby.gov.uk/signing-service/**

Slovak

Túto informáciu vám môžeme poskytnúť iným spôsobom, štýlom alebo v inom jazyku, ktorý vám pomôže k jej sprístupneniu. Prosím, kontaktujte nás na tel. č.: **01332 64XXXX** alebo na stránke **derby.gov.uk/signing-service/**

Urdu

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