

General Equality Impact Assessment (EIA) Form

Support:

An [EIA toolkit](#), [workshop content](#), and guidance for completing an [Equality Impact Assessment \(EIA\) form](#) are available on the [EIA page](#) of the [EDI Internal Hub](#). Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact the Equality, Diversity, and Inclusion (EDI) team by emailing Equalities@Brighton-Hove.gov.uk. If your request is urgent, please mention this in the subject line of your email so we can support as required.

Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Business Partner. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

Process:

- Once fully completed, submit your EIA to the Equalities team by emailing the Equalities inbox and copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), any other relevant service colleagues to enable EIA communication, tracking and saving.
- Your EIA will be reviewed, discussed, and then approved by the assigned EDI Business Partner and after seeking additional approval as appropriate for your EIA.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

Name of activity or proposal being assessed:	Public consultation on proposed reduction in public library services including closure of some community libraries and a reduction in opening hours at Jubilee and Hove Libraries.
Directorate:	Families, Children and Wellbeing
Service:	Library Service
Team:	Senior Leadership Team
Is this a new or existing activity?	New
Are there related EIAs that could help inform this EIA? Yes or No (If Yes, please use this to inform this assessment)	Yes – Budget EIA that went to Budget Council February 2025 Appendix 7 - Equality Impacts Assessments.pdf (budget proposal 2)

2. Contributors to the assessment (Name and Job title)

Responsible Lead Officer:	Anna Gianfrancesco – Director of Commissioning and Communities
Accountable Manager:	Ceris Howard – Head of Library and Customer
Additional stakeholders collaborating or contributing to this assessment:	Carolyn Bristow – Service Manager for Policy for Families, Children and Wellbeing

3. About the activity

Briefly describe the purpose of the activity being assessed:

As part of the city council budget agreement for 2025/26 the following savings were committed:

- Reduced opening hours at the Jubilee and Hove Libraries, as well as a review and closure of some community libraries (£69,000)

It was also indicated, via the Medium-Term Financial Strategy, that a further £140,000 would be achieved during 2026-27 through this review of library services (closures and opening hours), as the process for change would need at least 9 months to complete, showing part-year savings in 2025-26, completing in 2026-27

The proposals going to Cabinet in July 2025 are to conduct a public consultation for 12 weeks over the summer of 2025 to:

Consult on the proposed closure of Hollingbury Library

Consult on the proposed closure of Rottingdean Library

Consult on the proposed closure of Westdene Library

Consult on the proposed changes in opening hours at Hove Library

Consult on the proposed changes in opening hours at Jubilee Library

The full rationale for this proposal is available in the accompanying Cabinet report, which will be available here when published: [Brighton & Hove City Council - Agenda for Cabinet on Thursday, 17th July, 2025, 2.00pm](#)

What are the desired outcomes of the activity?

To conduct a public consultation where a wide range of views can be collected. This will inform the city council to enable decision making later in the year on this matter. This EIA is conducted in order to support the design and delivery of the public consultation process.

Which key groups of people do you think are likely to be affected by the activity?

- Library users
- City Residents
- Visitors to the city including those who work and study in the city

Staff within the council's library service are a vital stakeholder in this process. They will have specific mechanisms to engage with and contribute to the public consultations. If changes are made to the library service, staff will then have a separate staff consultation.

4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

- This proposal is to have a public consultation to gather views and feedback on the proposals. This EIA is made to ensure a full and robust public consultation is delivered, which actively seeks the views of a wide range of residents and library users.
- In order to make changes to library services, a needs and use analysis will be needed to understand the potential impact of the changes for residents. This would include analysis of travel times between libraries, areas of deprivation, demographic data etc. Part 1 of this analysis will be provided as part of the proposal to Cabinet in July 2025. This will then be further informed by the public consultation and Part 2 will be presented to Cabinet later in the year if a further paper is taken with final proposals.
- The Government's Department for Culture, Media and Sport requires a public consultation period, to engage with residents, users and non-users, for any proposals to reduce library services. It is proposed the opening hour changes and libraries closures are included in one public consultation which will run for 12 weeks in the summer/autumn of 2025. There will be a survey on Your Voice (the council's on-line consultation platform), with paper copies available in all libraries and more specific engagement with partners and stakeholders for each of the libraries affected.
- Our analysis made us aware of the particular importance of reaching seldom-heard or marginalised groups, exploring all available options to make consultation documents and communications fully accessible for disabled people, those with access requirements, different literacy or language requirements and non-digital engagement for those who are digitally excluded. We will also analyse our consultation feedback/data intersectionally where possible.
- Library staff at several levels will be affected by the proposals and a consultation with over 60 colleagues is likely to be required, once the public consultation has closed and decisions have been made, likely to be early 2026. However, during the public consultation, internal work will be undertaken to inform and engage with staff on the proposals.
- Once results are collated and shared, final proposals would be taken to a Cabinet meeting later in the year, and if changes are decided, at least one month's notice will be given to the public, likely to be spring 2026.

5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity? Consider all possible intersections.

(State Yes, No, Not Applicable as appropriate)

Age	YES
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Disability and inclusive adjustments, coverage under equality act and not	YES
Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)	YES
Religion, Belief, Spirituality, Faith, or Atheism	YES
Gender Identity and Sex (including non-binary and Intersex people)	YES
Gender Reassignment	YES
Sexual Orientation	YES
Marriage and Civil Partnership	YES
Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)	YES
Armed Forces Personnel, their families, and Veterans	YES
Expatriates, Migrants, Asylum Seekers, and Refugees	YES
Carers	YES
Looked after children, Care Leavers, Care and fostering experienced people	YES
Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)	NO
Socio-economic Disadvantage	YES
Homelessness and associated risk and vulnerability	YES
Human Rights	NO
Another relevant group (please specify here and add additional rows as needed)	NO

Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy, numeracy and /or digital barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered "NO" to any of the above, how will you gather this data to enable improved monitoring of impact for this activity?

Responses to the public consultation will be considered, including where people have talked about personal circumstances and any intersectionality of their characteristics. The digital and paper survey will seek to collect equalities monitoring data during the public consultation.

Some data about library users is gathered by the Library Management System when customers join the library. Not all equalities data for protected characteristic and groups listed above are able to be covered through that system. The public consultation will encourage responders to provide equalities monitoring data as part of their response, so that the impact of the proposals can be considered appropriately.

The accompanying Part 1 of the required Needs and Use Analysis is also provided with this assessment in the report to July Cabinet. This details what other data sets are available in the city to consider the needs and use of city library services, including the impact of the proposals set out in the report.

Staff data is managed through BHCC HR systems.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

The feedback received through the public consultation will be fully considered, available to Cabinet members who will be making the decisions on any resulting final proposals.

Data will be available on numbers of visitors and items loaned at libraries affected.

Feedback via comments and complaints.

Informal engagement with partners and stakeholders. This will be through direct communication, social media promotion and invites to public meetings.

Formal consultation with staff, 1:1s, team meetings.

Data and feedback will be monitored by the Libraries Senior Management Team and reported to the Communities and Commissioning Director and Senior Leadership Team.

Public Consultation feedback will be read in full. Themes will be identified and presented to Councillors when they are considering next steps and any final decisions.

General known data about library use is presented in section 3 (current library use) of the Needs and Use Analysis.

6. Impacts

Advisory Note:

- **Impact:**
 - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
 - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
 - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
 - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and

intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.

- For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.

- **Data Sources:**

- **Consider a wide range (including but not limited to):**

- [Population and population groups](#)
 - [Census 2021 population groups Infogram: Brighton & Hove by Brighton and Hove City Council](#)
- [Census](#) and [local intelligence data](#)
- Service specific data
- Community consultations
- Insights from customer feedback including complaints and survey results
- Lived experiences and qualitative data
- [Joint Strategic Needs Assessment \(JSNA\) data](#)
- [Health Inequalities data](#)
- Good practice research
- National data and reports relevant to the service
- Workforce, leaver, and recruitment data, surveys, insights
- Feedback from internal 'staff as residents' consultations
- Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
- Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.

- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

6.1 Age

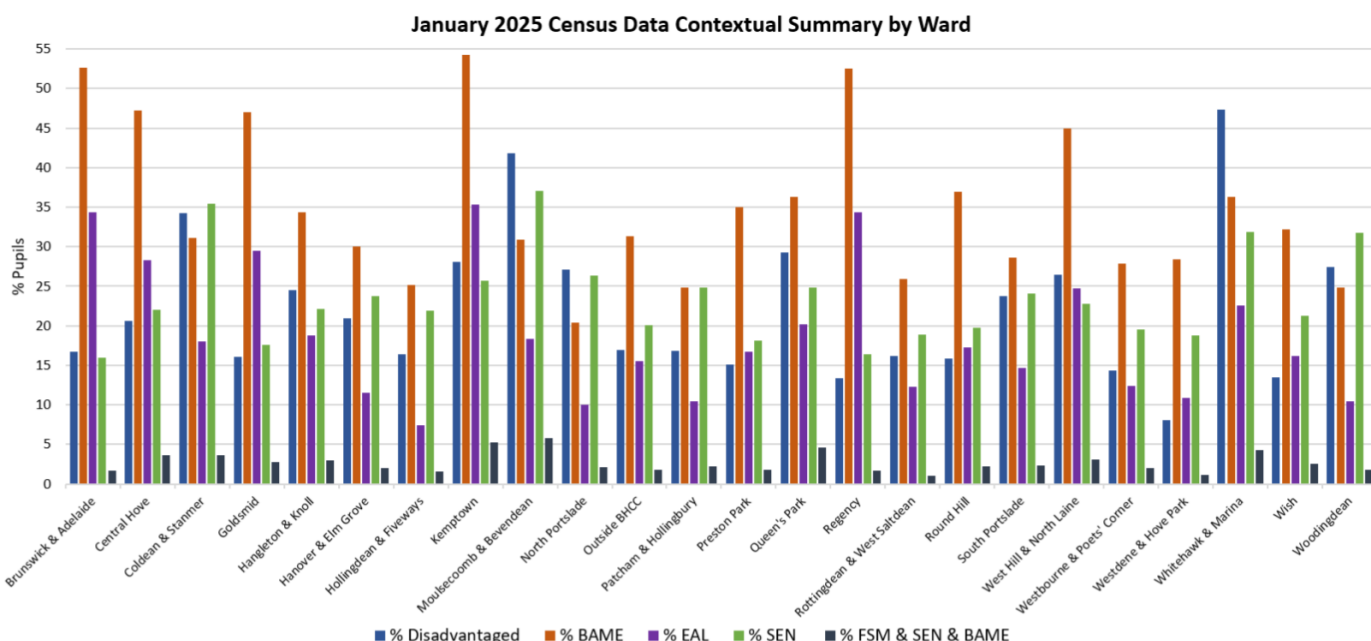
Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: people who may be housebound, those under 16, young adults, with other intersections.	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

What we know about library use/children and young people/older people in the city and how any changes to library provision may impact on them:

At a 2023 population estimate there were 46,666 children and young people under 18 living in Brighton & Hove. The chart below provides data on school aged children, showing the range of demographic characteristics we see across the city. The chart details each ward in the city and provides information on the percentage of pupils within each ward who are disadvantaged, Black, Asian and Minority Ethnic group (DfE use this terminology), English as a Second language, special educational needs and how some children have more than one of those characteristics. This will be especially relevant for the wards where there are proposed closures but already recognising that residents/library users from across the city may be impacted by the proposed reduction in opening hours at the central libraries.



Library services are important for both young and older people.

In 2023, the National Literacy Trust found that the percentage of children and young people aged 8 to 18 who said that they didn't have a book of their own at home increased compared with the year before, particularly for those from lower-income homes⁴.

In 2022 nearly 1 in 10 children receiving free school meals (FSMs) said they did not have a book of their own. Since then, that figure has risen to 1 in 8. Children who are on FSMs are twice as likely not to own a book as those who are not. In fact, the percentage-point (pp) gap in book ownership between children and young people who receive FSMs and their peers who do not (6.6 pp) is now at its largest in a decade.

The effects of our aging population are also among the biggest social challenges we will face over the coming decades, as a society, economically, and within our own families. There is evidence that libraries have a part to play in combatting social isolation.⁶ Brighton & Hove has a higher proportion of older people living in poverty compared to England and the South East.⁷

Westdene Library is located within Westdene Primary School and four times as much children's fiction as adult fiction is borrowed from this community library. If closed, there will be an impact on local children and young people not being able to borrow books or use resources from this site.

Other disproportionate impacts may include:

- Children and young people: loss of after-school study spaces, homework support and digital access for families without home internet.
- Older adults: reduced social contact opportunities, loss of accessible community spaces, impact on those with mobility issues accessing alternative locations.
- Working age adults: reduced access to job search facilities, IT support and lifelong learning opportunities.
- Socio-economically disadvantaged older people: loss of designated Warm Spaces in the winter.

Mitigations against potential impacts

Distance and travel to alternative libraries will be a key consideration when considering closure. It will be important to understand the ease, accessibility and cost impacts of travel to alternative libraries where there may be a closure or a reduction in opening hours when those library users want to access the service.

This will be important for older people and young families who may be unable to walk far and rely on transport (public or private car) to travel to another library. The closure will affect disproportionately people who could walk to libraries before closure and will have to buy bus tickets afterwards.

For each of the proposed library closures there are alternative libraries within 2 miles, and the city is generally well served by public transport. However, these potential impacts and mitigations will be considered further during the public consultation, based on feedback received.

Other potential mitigations may include:

- Maintaining children's services as priority during reduced library opening hours.
- Partnering with schools and colleges to provide alternative study spaces.
- Develop online resources and digital literacy support.
- Signposting to alternative Warm Spaces nearby if there are any.
- Consideration of the parking options, particularly for drivers with accessibility requirements around the alternative libraries.

For the public consultation:

The Your Voice survey is available for anyone aged 13 and above and we'll be asking responders if they could state their age as part of their reply, as well as a range of other protected characteristic information. This will help us analyse the consultation responses based on age.

We will communicate with city nurseries, schools and colleges to ensure parents/carers of children and young people are made aware of the proposals.

We will liaise with support services such as Family Hubs, the Adult Education Hub and the Employment Service to continue encouraging participation from younger parents. We will use social media platforms and online promotion to reach younger parents in conjunction with traditional methods of promotion.

Consideration will be given to the timing of any public consultation events so parents with young families can attend.

We will approach youth services in the city to ensure they are aware of the consultation and may be able to assist young people to participate.

We will communicate directly with young people through the Summer Reading Challenge programme.

Engagement will be planned with Westdene Primary School which is where Westdene Library is co-located.

These steps will help ensure that the consultation reaches underheard communities in the city.

We will communicate with groups that support and network with older people in the city to ensure they are aware of the consultation and may be able to promote across their network.

Therefore, it will be possible to provide some analysis post public consultation on views of children and young people and for older people. The public consultation will also encourage responders to share free text comments on their views of the proposals; this will help gain a fuller understanding of the implications of the closures which will be reflected within the next EIA and report to Cabinet in December 2025.

We will develop greater equalities insight by including equalities monitoring questions in both paper and digital consultations.

We will ensure that all consultation materials, communications and processes are fully accessible for people of all ages by providing them in plain English, in a variety of accessible formats, such as for

example Braille, Easy Read, British Sign Language, various languages and both digital and traditional paper formats. These would be available upon request and for some would require time to provide.

An accessibility statement will be available for both digital and traditional (non-digital) consultation materials and relevant communications, outlining our approach to supporting access requirements, and how people can let us know about any access requirements.

6.2 Disability:

Does your analysis indicate a disproportionate impact relating to Disability, considering our anticipatory duty?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

What we know about library use/disabled people in the city and how any changes to library provision may impact on them:

The accompanying Needs and Use Analysis details the geographical spreads of health deprivation and disability rank across the city.

Brighton & Hove has an aging population and a significant proportion of residents with long-term health conditions, mental health issues, or those who are disabled.

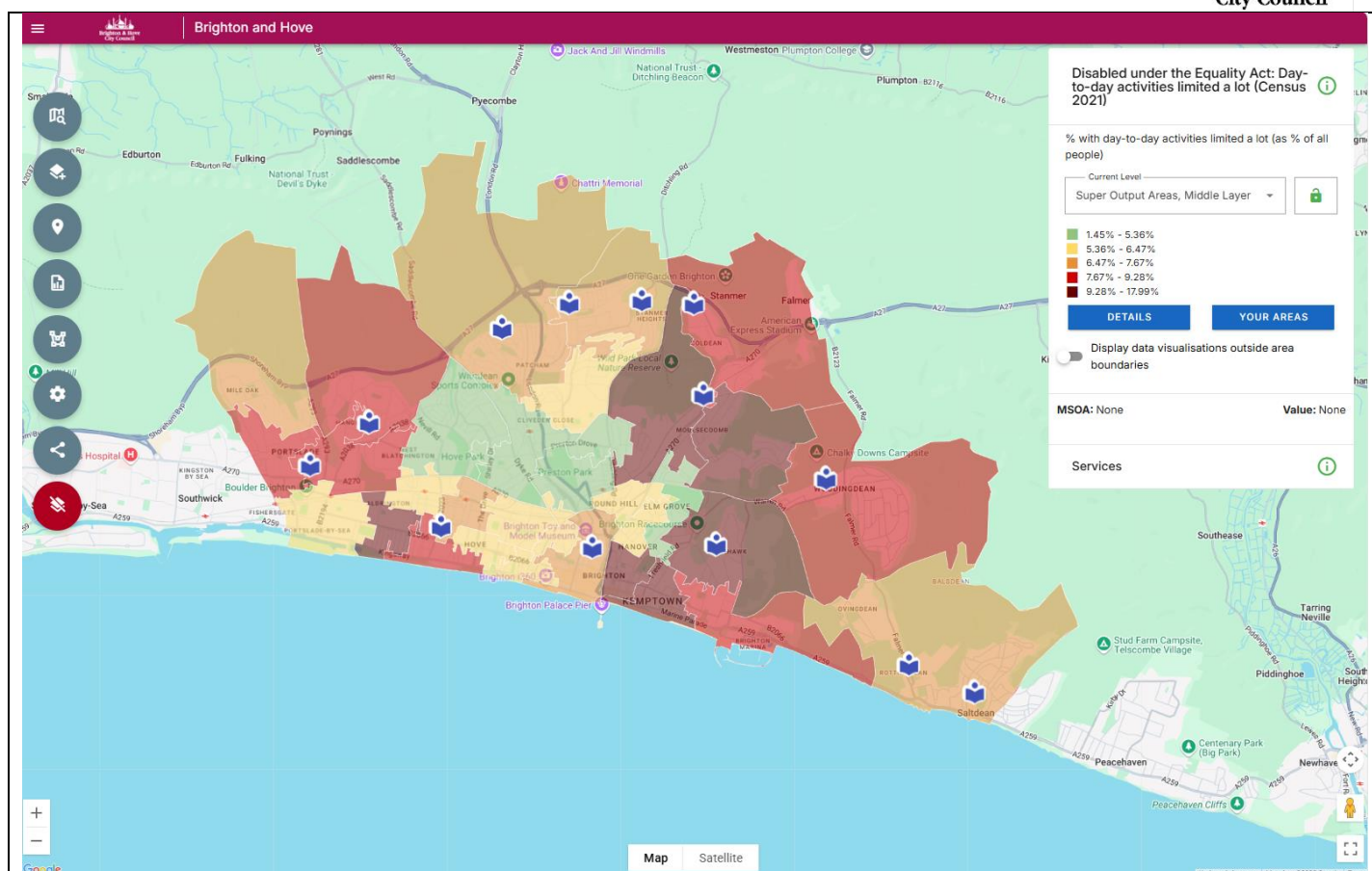
Among disabled residents, for two out of five (20,351, 39%) their day-to-day activities are limited ‘a lot’ and for three in five (31,446 people, 61%) their activities are limited ‘a little’. Both proportions are similar to what is seen in the South East and England.

Over four out of five residents (225,306 people, 81%) are not disabled as defined by the Equality Act. This is lower than seen in both the South East (84%) and England (83%).

Nearly three quarters of residents have no long term physical or mental health condition (74%). This is lower than seen in the South East (76%) and England (76%).

Among residents who are not disabled, nearly one in ten (20,502 people, 8%) have a long term physical or mental health condition. However, this condition does not affect their day to day activities. This is similar to what is seen in both the South East (8%) and England (7%).

Residents who are disabled under the Equality Act are concentrated in the central/eastern area of the city, particularly in East Brighton, Queens Park and Hollingbury & Stanmer wards. However, there are also higher proportions of disabled people in the east in Woodingdean and to the west in Hangleton & Portslade. This is shown in the image below.



This shows us that in the areas where community libraries are proposed to close there are lower levels of disabled people. It also shows that there is a higher density of disabled residents near to Hove and Jubilee Libraries, where opening hours are proposed to reduce.

Ranking upper tier local authorities by the proportion of disabled residents shows that Brighton & Hove (19%) is ranked 51 out of 152 authorities (second quintile).

Disabled customers may not be able to travel independently to access a library further from their home. They may also face additional costs through the increased travel, especially people who need to use a private vehicle for travel. Disabled households are already more likely to be under greater financial strain due lower income and greater household costs.

They could find Libraries Extra more challenging to use than staffed library services, so this being available in community libraries will have limited impact in areas where a library has closed and will not mitigate loss of opening hours in Jubilee and Hove libraries.

We also know that libraries support people to live healthier lives in a range of ways, including providing access to health information and Books on Prescription, hosting healthcare events and opportunities, delivering books to those who are housebound and addressing social isolation and loneliness.⁵ While overall life expectancy has risen in Brighton & Hove, healthy life expectancy has declined in recent years, meaning people are living longer but with more health issues. Additionally, the number of people with long-term health conditions or those who are disabled is increasing.

If changes are made to library provision, it is essential to consider how these would impact those who are disabled.

Other disproportionate impacts may include:

- Loss of accessible, familiar environments.
- Reduced access to assistive technology and adapted materials (for example large print books).
- Impact on those who rely on libraries for social interaction and routine.

- Potential barriers to accessing alternative venues.
- Loss of Blue Badge disabled bays close to libraries listed for closure.

Mitigations against potential impacts

As above, distance and travel to alternative libraries will be a key consideration when considering closure. It will be important to understand the ease and accessibility of travel to alternative libraries where there may be a closure or a reduction in opening hours when those library users want to access the service.

This will be important for disabled people who may be unable to walk far and rely on transport (public or private car) to travel to another library. Or for factors such those with neurodiversity who may struggle to adapt to a change in routine.

For each of the proposed library closures there are alternative libraries within 2 miles and the city is generally well served by public transport. However, these potential impacts and mitigations will be considered further during the public consultation, based on feedback received, particularly for those who may experience accessibility barriers due to being disabled. We will conduct accessibility audits on the identified alternative libraries.

The library service offer does include a Home Delivery Service which is available for those in need, including disabled library users. This may be an alternative for some that are impacted by a community library closure.

For the public consultation:

Consultation documentation should be available in accessible formats, and efforts made to ensure disabled residents are made aware of the proposals and the consultation. We will communicate directly with council and community support services to ensure they are aware of the consultation and can share with their networks where possible. An Easy Read version of the proposals will be made available. Public meetings will be held at a range of times, venues and online to enable disabled residents and library users to engage in a way and at a time that suits them.

We will develop greater equalities insight by including equalities monitoring questions in both paper and digital consultations.

We will ensure that all consultation materials, communications and processes are fully accessible for people of all ages by providing them in plain English, in a variety of accessible formats, such as for example Braille, Easy Read, British Sign Language, various languages and both digital and traditional paper formats.

An accessibility statement will be available for both digital and traditional (non-digital) consultation materials and relevant communications, outlining our approach to supporting access requirements, and how people can let us know about any access requirements.

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: those who are housebound due to disability or disabling circumstances, D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

Listed above

6.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

Does your analysis indicate a disproportionate impact relating to ethnicity?

YES

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

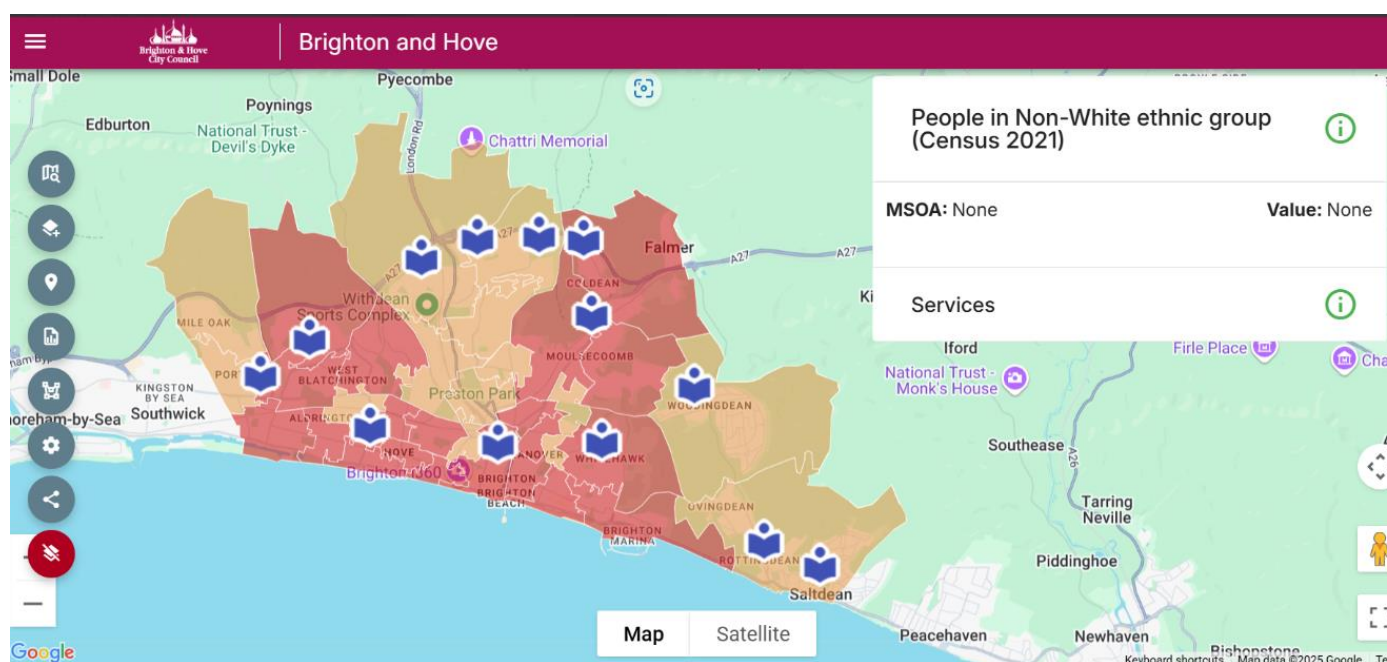
What we know about library use/Black and Racially Minoritised people in the city and how any changes to library provision may impact on them:

According to the 2021 census 26% of people are Black or racially minoritised (27%):

- 4.8% Asian or Asian British (10%)
- 2.0% Black or Black British (4%)
- 4.8% Mixed or multiple ethnic group (3%)
- 1.1% Arab (0.6%)
- 11.5% White Irish or White other (8%)

Despite the overall number of residents only increasing by 1% since the last Census. The number of Black or Racially Minoritised residents has increased by over a third (35%, 18,921 people), especially in young population groups.

Certain Black and racially minoritised communities may be disproportionately affected, dependent on the demographic of the areas affected by library closures. This can be viewed in the image below which is the geographical spread to Census 2021 responders who identified as anything other than White. This shows that for the areas of proposed library closure there are fewer BRM residents.



For nearly one in ten residents (24,579 people, 9.1%) English is not their first or preferred language. Higher than the South East (7.2%) but similar to England (9.2%).

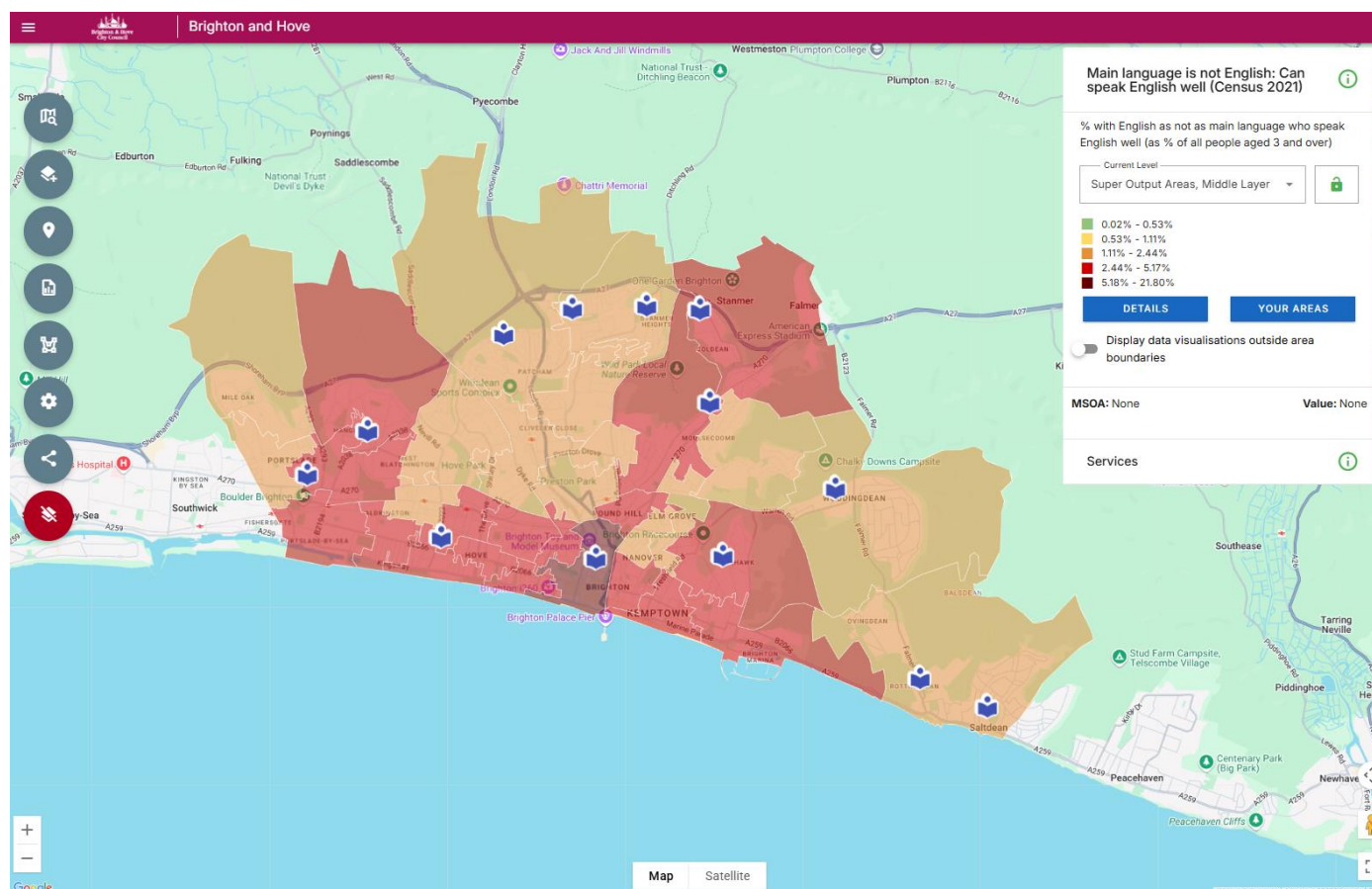
For 145 residents their main or preferred language is a sign language, 120 residents use British Sign Language.

Among residents (24,577) for whom English is not their main or preferred language:

- 87% speak English very well or well
- 11% (2,732 people) cannot speak English well

- 2% (386 people) cannot speak English
- In more than one in twenty city households (7,817, 6.4%) no adult speaks English as a main or preferred language.

Taking the measure of those whose main language is not English, but they can speak English well, the image below shows the geographical spread across the city from the Census 2021.



This shows us that for where community libraries are proposed for closure, there are fewer residents from those demographic groups than in some other areas of the city. It also shows that there is a higher density of these demographic populations directly around Jubilee Library in the centre of the city.

Mitigations against potential impacts

Black and Racially Minoritised communities who are resident in the city are most likely to be impacted by the proposed reduction in opening hours at Hove and/or Jubilee library due to density of resident populations. Mitigations will focus on being clear, with inclusive communications, on any new opening hours of those central libraries, to ensure notice is given for users to amend when and how they use the service. Further promotion to be undertaken to highlight the online library service offers to support people when the libraries are closed. This applies to all service users but may impact directly on local BRM residents due to the density of population in central areas of the city.

If Black and Racially Minoritised service users are impacted by community library closures, travel and access to alternative libraries will be a consideration. Alternative libraries will be available within 2 miles of each library which are proposed for closure and the city is generally well served by public transport.

Library users for whom English is not their first language require clear and accessible communications about any changes in library service offer and their regular library(ies).

For the public consultation:

We will communicate with BRM community groups to ensure they have awareness of our consultation and ask for them to share across their networks as appropriate. We will encourage groups to make their own submissions to the consultation so we can gain an understanding of the potential impact on BRM communities across the city, as a typically underheard and underreached voice in council consultations. We will be particularly interested in hearing from groups that are BRM run organisations but will share widely. We will offer to work with community organisations to host in-person listening sessions.

Whilst not always directly linked to BRM status, we'll also be ensuring accessibility to the public consultation for those who have English as an additional language. We'll be advertising the translation option on YourVoice portal. We'll communicate with relevant services in the city so that they are aware of the consultation and can share with their networks as appropriate. These will include council commissioned translation and interpreting services and the EALT service.

When analysing the public consultation feedback we will disaggregate consultation responses by ethnicity (where people have declared this) to ensure we can understand and hear from minority voices in the city, and they are not obscured in the broader analysis.

6.4 Religion, Belief, Spirituality, Faith, or Atheism:

Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?	YES
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If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

What we know about library use/People of faith, belief, religion, spirituality or atheism in the city and how any changes to library provision may impact on them:

According to the 2021 census 55.2% of people have no religion or belief

- 30.9% Christian (46%)
- 3.1% Muslim (6.7%)
- 0.9% Jewish (0.5%)
- 0.9% Buddhist (0.5%)
- 0.8% Hindu (1.8%)
- 0.1% Sikh (0.9%)
- 1.0% Other religion (0.6%)

Considering the intersection of faith and ethnicity, some faith communities may be disproportionately affected dependent on the demographic of the areas affected by library closures.

For the public consultation:

Efforts will be made to ensure the consultation is conducted in a way that is accessible for a range of beliefs. For example, public meetings being held a range of times, venues and online to accommodate those with religious observances/festivals during that time including providing spaces which are prayer friendly. Efforts will be made to share the consultation with faith groups across the city, asking them to share with their networks.

6.5 Sex:

Does your analysis indicate a disproportionate impact relating to and Sex (including non-binary and intersex people)?	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

What we know about library use and sex and how any changes to library provision may impact on groups:

There is potential for additional impact on women as predominantly primary child carers, especially for young children. Community libraries provide a neutral safe social space for women with young children. Lack of a local library facility could disproportionately impact on women. CIPFA library usage data shows that women are the greater user of library services nationally.

It will be important to consider impact on women with intersectional protected characteristic, eg disabled women, migrant women, women of colour.

For the public consultation:

Efforts will be made to ensure that women will be reached through this consultation. Information will be sought through the public consultation on people's sex and and this will help inform analysis of public consultation responses. A range of consultation meeting times and venues will be available to accommodate for different caring responsibilities that may reduce someone's ability to attend.

6.6 [Gender Identity](#) /Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to Gender Identity / Gender Reassignment ?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

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6.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to Sexual Orientation ?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.10 Armed Forces Personnel, their families, and Veterans:

Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Brighton & Hove Library service has the Library Service of Sanctuary Award, so any reduction in provision potentially reduces access to a safe and welcoming environment for these communities.

It may also reduce access to free resources such as materials supporting English language development.

Within the public consultation, efforts will be made to hear from these communities and organisations that support them, to ensure impacts may be more fully understood and considered.

6.12 [Carers](#):

Does your analysis indicate a disproportionate impact relating to [Carers](#) (Especially considering for age, ethnicity, language, and various intersections).

YES

If “YES”, what are the positive and negative disproportionate impacts?

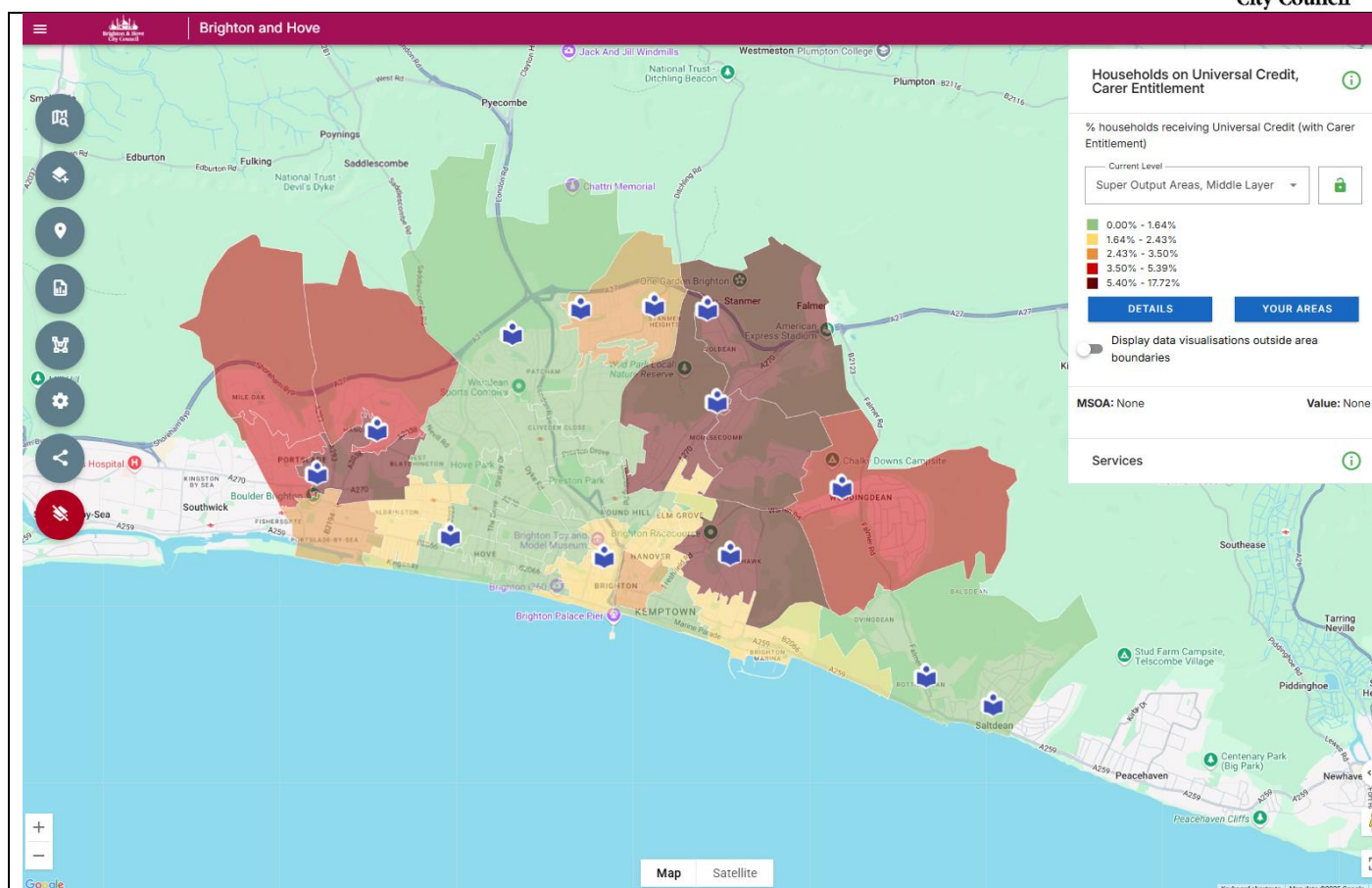
Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

What we know about library use/people who are carers and how any changes to library provision may impact on them:

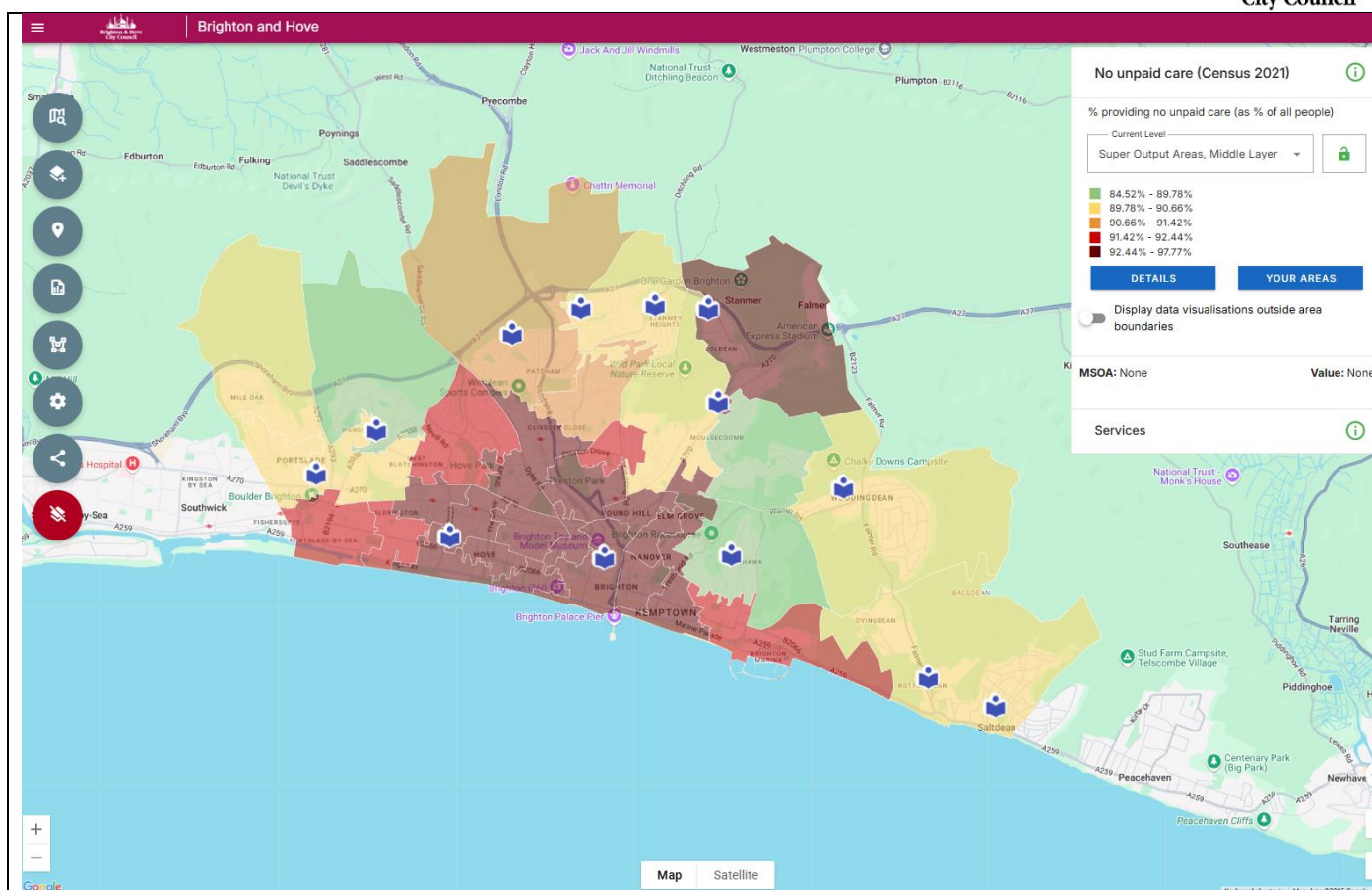
According to the 2021 census, 1 in 12 residents (20,800 people, 7.8%) provide un-paid care (9%).

Carers may have restrictions in the times and days they can access services, therefore a reduction in access hours could disproportionately affect their use of services.

The image below shows a geographical spread of households who receive Universal Credit with carer entitlement. This shows us that there is a lower density of those residents in the areas where there are proposed closures to 2 community libraries but an increased % of the population around Hollingbury Library. It also shows us that there is an increased % of the population around Jubilee Library and near to Hove Library, where there are proposed reductions in opening hours.



The census 2021 asked residents about their levels of unpaid care and the image below shows the geographic distribution of responses. This shows us that there are greater proportions of those providing unpaid care in the areas where community libraries are proposed to be closed.



Mitigations against potential impacts

Library users who have caring responsibilities or who require care will require accessible, affordable and timely access to alternative libraries. For each of the proposed library closures there are alternative libraries within 2 miles and the city is generally well served by public transport. However, these potential impacts and mitigations will be considered further during the public consultation, based on feedback received.

The library service offer does include a Home Delivery Service which is available for those in need, including carers. This may be an alternative for some that are impacted by a community library closure.

For the public consultation:

Efforts will be made to target communication to carers support groups and ask them to share with their network.

6.13 Looked after children, Care Leavers, Care and fostering experienced people:

Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).

Also consider our [Corporate Parenting Responsibility](#) in connection to your activity.

YES

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

What we know about library use/care experience and how any changes to library provision may impact on groups:

Brighton & Hove City Council have adopted Children in Care and Care Experienced as a protected characteristic and will demonstrate commitment to ensure that this group are not discriminated against within the changes proposed for library services.

For the public consultation:

Efforts will be made to ensure that care experienced residents and children in care will be reached through this consultation. This will help inform analysis of public consultation responses.

6.14 Homelessness:

Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)

YES

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

What we know about library use/people who are homeless or at risk of homelessness and how any changes to library provision may impact on them:

There are a number of vulnerably or un-housed customers who regularly use Jubilee Library as a safe, warm space, particularly in winter. Any reduction in opening hours could disproportionately affect this group. Jubilee Library supports a local street community around the building.

For the public consultation:

We will attempt to reach this underheard community whilst they are visiting libraries during the consultation.

6.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?

NO

If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

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6.16 Socio-economic Disadvantage:

Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)	YES
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

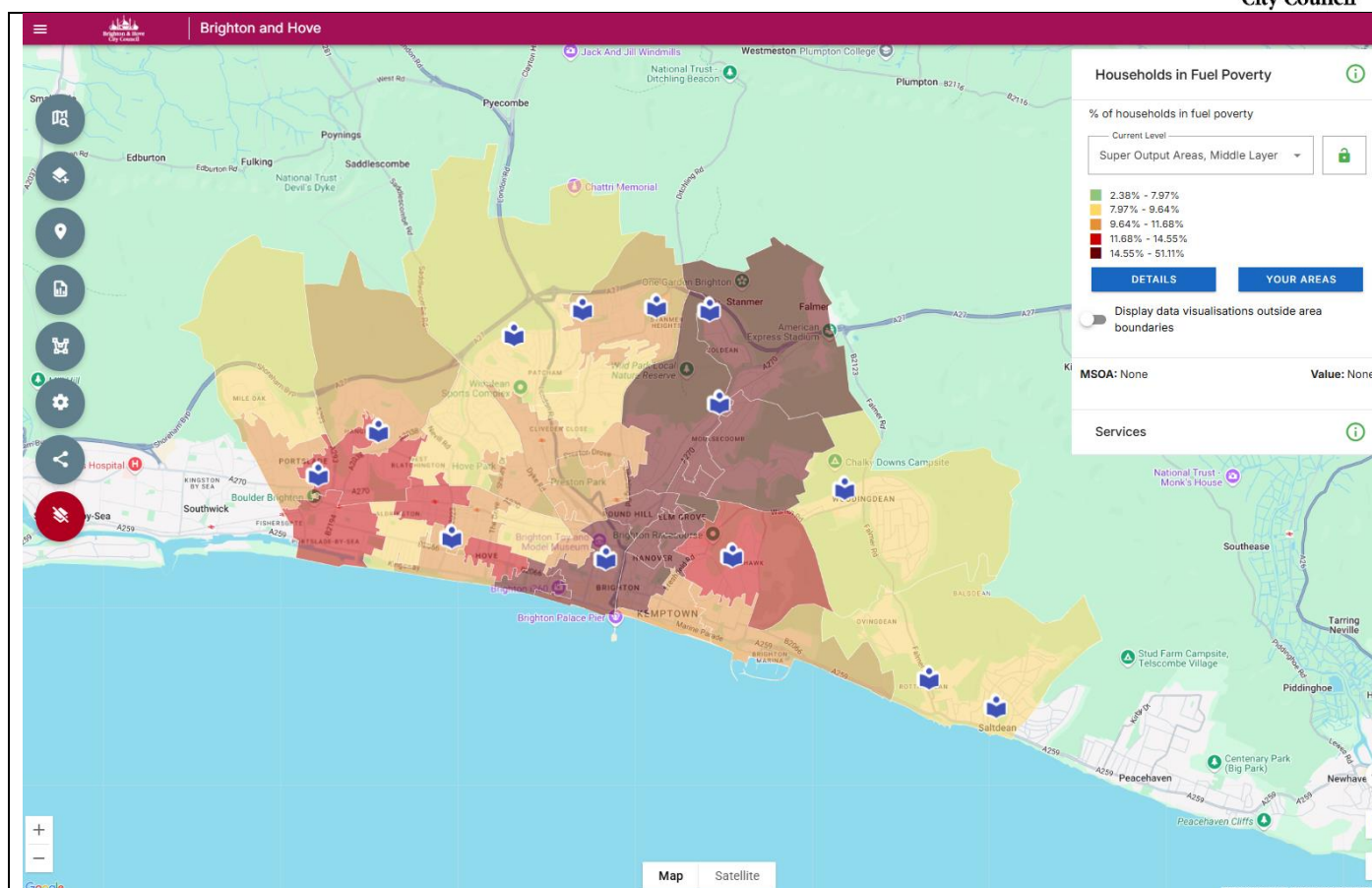
What we know about library use/people who are at socio-economic disadvantage or at risk of homelessness and how any changes to library provision may impact on them:

Customers at a socio-economic disadvantage may be less able to pay for travel to alternative provision.

Regarding Hollingbury Library, while at ward level the area's IMD ranking suggests residents live at relatively low risk of deprivation, at a more granular level there are pockets of high deprivation that should be acknowledged close to the centre in which the library is situated. Overall, ward residents are at a lower risk of digital exclusion than the city's average and 84% of residents own a car.

Regarding Rottingdean Library, an IMD rank of 25,035 suggests that residents in the ward are at a low risk of deprivation (second only to Westdene).

Regarding Westdene Library, residents of Westdene & Hove Park ward are the most likely in the city to own a car and have qualifications. They are the least likely in the city to be digitally excluded, economically inactive or in receipt of benefits. It is the lowest scoring (least deprived) ward in Brighton & Hove with an IMD ranking of 28,634 and has the lowest number of economically inactive residents. The ward has the lowest crime rate in the city and children here are the least likely (by a significant majority) to be in receipt of free school meals. The image below shows the geographical spread of households in Fuel Poverty. This shows us that there are lower %s of houses in fuel poverty around Westdene and Rottingdean library but a higher % around Hollingbury. There is a greater density of households in fuel poverty directly around Jubilee Library and near to Hove Library, where opening hours are proposed to be reduced.



Mitigations against potential impacts

For each of the proposed library closures there are alternative libraries within 2 miles and the city is generally well served by public transport. For some these alternative libraries will be walkable and therefore affordable but not for all.

Further promotion to be undertaken to highlight the free to use online library service offers to support people when the libraries are closed.

For the public consultation:

Active work needs to happen before and during the consultation process to ensure efforts are made to hear from residents and stakeholders from a wide range of geographical spread over the city but also within specific groups and communities where we know there are likely to be underheard people. This also applies for the areas where there are fewer levels of socio-economic disadvantage as communities are not homogeneous and it will be important to consider multiple barriers for people to respond to the consultation and explore creative ways to overcome that.

6.17 Human Rights:

Will your activity have a disproportionate impact relating to Human Rights?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

6.18 Cumulative, multiple [intersectional](#), and complex impacts (including on additional relevant groups):

What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
 - People being housebound due to disabilities or disabling circumstances
 - Environmental barriers or mobility barriers impacting those with sight loss, D/deafness, sensory requirements, neurodivergence, various complex disabilities
 - People experiencing homelessness
 - People on a low income and people living in the most deprived areas
 - People facing literacy, numeracy and/or digital barriers
 - Lone parents
 - People with experience of or living with addiction and/ or a substance use disorder (SUD)
 - Sex workers
 - Ex-offenders and people with unrelated convictions
 - People who have experienced female genital mutilation (FGM)
 - People who have experienced human trafficking or modern slavery

It will be important to hear from a wide range of residents, customers and stakeholders during the proposed public consultation to enable greater analysis and understanding of the impacts of the proposals. The data above indicates that there could be a greater impact on residents who are younger, older, disabled and those at risk of socio-economic disadvantage.

When we are considering those with membership of multiple minoritised groups it is essential that the public consultation draws out more reflections on the potential cumulative impact there could be of the proposed changes. This includes using an intersectional lens when reviewing the consultation responses and considering how some individuals or communities may have multiple impacts.

It is essential that we encourage communities in all areas of the city to engage in the consultation process and provide alternative methods for them to respond. Additional steps should be taken to engage residents and other stakeholders with this consultation. Advice and support will need to be sought from a range of teams and those with links to various communities, especially where we are trying to hear from those from minoritised groups. For public meetings with a focus on a particular community, explore with individual schools the languages spoken and benefit of providing interpreters. We will be engaging with community organisations to reach the most marginalised groups.

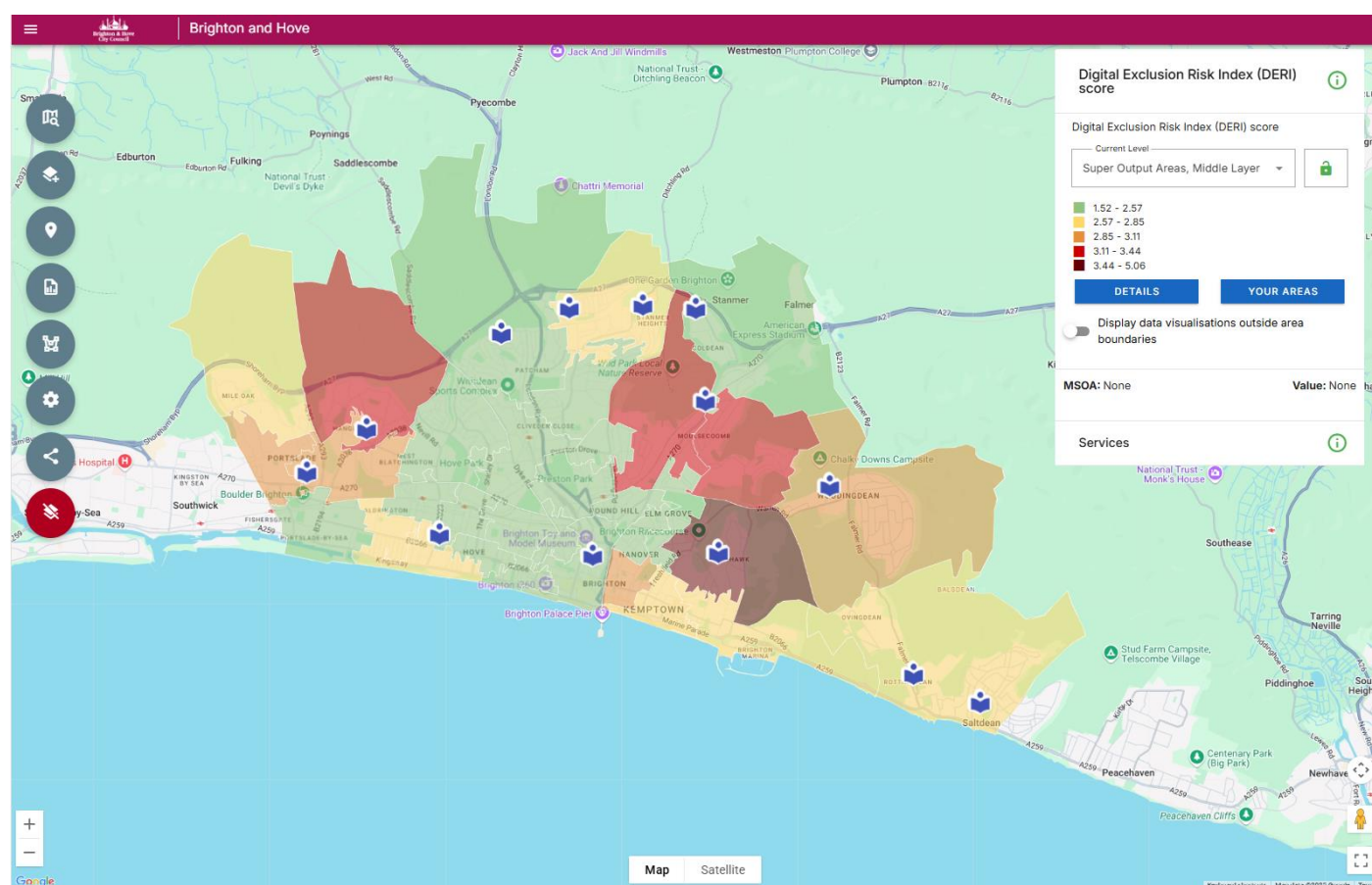
We will highlight that there is a translation function on YourVoice so that consultation information can be viewed in different languages.

The consultation process must be as accessible as possible for all residents to respond to; events will be held at a variety of times and in locations which allow interested residents to participate.

Through the anonymised responses to the survey and other activities within the public consultation, we will be able to consider any impact on human rights, consider how to monitor that in future and what mitigations may be able to be put in place to minimise/remove these.

We also want to hear during the public consultation from LGBTQ+ communities about whether it is felt there will be an impact from the proposed reductions in service. We will be reaching out to relevant community organisations to seek their engagement with the consultation. We are keen to hear from those within the community who also have an intersectional relationship with other protected characteristics eg LGBTQ+ people of colour, or LGBTQ+ people who are disabled.

It is recognised that a reduction in library services may have a detrimental impact on residents who are digitally excluded. The image below shows the geographical spread of the Digital Exclusion Risk Index score (which shows risk or likelihood of exclusion) across the city. This shows that there are areas of the city not directly impacted by the proposed closures of community libraries which have higher densities of digital exclusion risk. It is important to note that users of the two central libraries of Jubilee and Hove may come from all over the city so could be impacted by the proposed reduction in opening hours.



7. Action planning

What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

1 We will ensure that all consultation materials, communications and processes are fully accessible for people of all ages by providing them in plain English, in a variety of accessible formats, such as Braille, Easy Read, British Sign Language, various languages and both digital and paper formats.
2 An accessibility statement to be available for the consultation, outlining our approach to supporting access requirements, and how people can let us know about any access requirements.
3 Clearly defined and actioned efforts to be made to communicate directly with a wide range of support and community services / groups / networks to ensure that the consultation is widely known.
4 Analysis of the feedback/responses received via the public consultation (a survey, public meetings, emails and written correspondence) will be analysed from an equalities perspective. This will ensure that impact on protected characteristics and wider equalities matters are considered in relation to discrimination, inclusion and equity. This will also be done from an intersectional perspective, recognising that discrimination and exclusion can be amplified for those with multiple characteristics, which can put them at risk of disadvantage.
5 We will develop greater equalities insight by including equalities monitoring questions in both traditional and digital consultations.

Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

The consultation and engagement plan for the public consultation.

8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

Stop or pause the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
Adapt or change the activity to eliminate or mitigate disproportionate impacts and/or bias.	
Proceed with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	
Proceed with caution – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	X

If your decision is to "Proceed with caution", please provide a reasoning for this:

This assessment explores what we know about the city population and how this needs to inform the design, delivery, analysis and reporting of a public consultation for proposed changes to city library

provision. Actions are identified to increase and enhance underheard and underserved community voices.

Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:

9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

N/A – this is to be a public document

10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Anna Gianfrancesco	03/07/2025
Accountable Manager:	Ceris Howard	03/07/2025

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

EDI Review, Actions, and Approval:

Equality Impact Assessment sign-off

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing. Budget and Staffing EIAs secure EDI Manager and Head of Service level approval via different templates.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Eric Page. Zofia Danin	04/05/2025
EDI Manager:	Debs Totney	04/07/2025

Notes and recommendations from EDI Business Partner reviewing this assessment:

Notes and recommendations (if any) from EDI Manager reviewing this assessment:

Notes and recommendations (if any) from Head of CETS Service reviewing this assessment:

